

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (1_3)**
- Recertification Assessment** (Choose an item.)
- Extension of Scope**

Client Company Name: TDM Plantation Sdn Bhd
Client Company Address: Level 3, Bangunan UMNO Terengganu Lot 3224, Jalan Masjid Abidin, 21000 Kuala Terengganu, Terengganu, Malaysia
Certification Unit: Sungai Tong Palm Oil Mill Location of Certification Unit: Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu, Terengganu, Malaysia
Date of Final Report: 12/02/2022

TABLE of CONTENTS	Page No
Section 1: Scope of the Assessment.....	3
1. Company Details	3
2. Certification Information	3
3. Other Certifications.....	4
4. Location(s) of Mill & Supply Bases	4
5. Description of Supply Base	4
6. Plantings & Cycle.....	5
7. Summary of Certified Tonnage of FFB (Own Certified Scope)	5
8. Summary of Certified Tonnage of FFB (from other certified unit(s))	6
9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate).....	6
10. Summary of Certified Tonnage (not applicable for ISS)	7
11. Summary of Actual Volume sold	8
12. Independent Smallholders Certified Tonnage / Volume	11
13. Independent Smallholders Actual Sold Tonnage / Volume	11
Section 2: Assessment Process	12
2.1 Assessment Methodology, Programme, Site Visits.....	12
2.2 BSI Assessment Team	14
1.3 Assessment Plan.....	16
Section 3: Assessment Findings	19
3.1 Multiple Management Units and Time Bound Plan.....	19
3.2 Progress of scheme smallholders and/or outgrowers.....	20
3.3 Details of Nonconformities	23
3.3.1 Status of Nonconformities Previously Identified and Observations.....	27
3.3.2 Summary of the Nonconformities and Status	32
3.4 Stakeholders and previous land owner / user consultation.....	33
3.5 Impartiality and conflict of interest	35
Formal Signing-off of Assessment Conclusion and Recommendation	36
Appendix A: Summary of Findings	37
Appendix B: GHG Reporting Executive Summary	120
Appendix C: Location Map of Certification Unit and Supply bases.....	122
Appendix D: Estate Field Map.....	123
Appendix E: List of Smallholder Registered and sampled.....	125
Appendix F: List of Abbreviations.....	126

Section 1: Scope of the Assessment

1. Company Details			
Parent Company	TDM Plantation Sdn Bhd		
RSPO Membership Number	1-0095-11-000-00	Membership Approval Date	28/02/2011
Address	Level 3, Bangunan UMNO Terengganu Lot 3224, Jalan Masjid Abidin 21000 Kuala Terengganu, Terengganu, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Sungai Tong Palm Oil Mill		
Location / Address	Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu, Malaysia		
Website	www.tdmberhad.com.my		
Management Representative	Haji Shahbudin Bin Usop	E-mail	ksst.tdmp@tdmberhad.com.my shahbudin.tdmp@tdmberhad.com.my
Telephone	09-6571242 / 019-9141399	Facsimile	-

2. Certification Information			
Certificate Number	RSPO 595564	Certificate Start Date	27/12/2018
Date of First Certification	27/12/2013	Certificate Expiry Date	26/12/2023
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	To conduct a surveillance assessment to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by Sg Tong Palm Oil Mill and Supply Base's management system and the ability of the management system to ensure the organization meets applicable statutory, regulatory, and contractual requirements and as applicable, to identify areas for potential improvement of the management system(s).		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" 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 678754	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn. Bhd.	26/12/2022
MSPO 686825	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3	BSI Services Malaysia Sdn. Bhd.	26/12/2022

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

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (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
Jaya Estate	3,365.50	-	90.29	3,455.79	97.39
Fikri Estate	3,103.85	-	607.20	3,711.05	83.64
Tayor Estate	2,127.27	305.88	92.65	2,525.80	95.83

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

Pelong Estate	1,351.88	-	1,359.44	2,711.32	44.81
Jerangau Estate	1,436.57	-	44.35	1,480.92	97.01
Pinang Emas Estate	2,823.91	-	1,046.27	3,870.18	72.97
Total	14,208.98	305.88	3240.20	17,755.06	80.03

6. Plantings & Cycle

Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Jaya Estate	-	-	1,648.77	1,601.43	115.30	3,365.50	-
Fikri Estate	899.77	-	92.99	1,885.77	225.32	2,204.08	899.77
Tayor Estate	636.62	-	16.59	1,474.06	-	1,490.65	636.62
Pelong Estate	867.54	62.26	-	422.08	-	484.34	867.54
Jerangau Estate	689.08	479.61	-	59.72	208.16	747.49	689.08
Pinang Emas Estate	914.49	253.58	133.20	1,487.50	35.14	1,909.42	914.49
Total (ha)	4,007.50	795.45	1,891.55	6,930.56	583.92	10,201.48	4,007.50

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

Estate / Smallholders	Tonnage / year			
	Estimated last year (Jan 2021 – Dec 2021)	Actual (Sept 2020 – Aug 2021)		Forecast (Jan 2022 – Dec 2022)
		Previous license period (Sept 2020 – Dec 2020)	Current license period (Jan 2021 – Aug 2021)	
Jaya Estate	69,400.00	28,148.59	28,212.02	64,000.00
Fikri Estate	41,310.00	14,783.56	17,516.58	32,400.00
Tayor Estate	28,100.00	11,622.41	12,417.62	22,200.00
Pelong Estate	4,680.00	1,232.02	2,235.09	3,840.00
Jerangau Estate	13,000.00	3,033.07	6,138.51	13,500.00
Pinang Emas Estate	5,000.00	996.04	9,133.84	25,150.00
Total	161,490.00	135,469.35		161,090.00

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

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Jan 2021 – Dec 2021)	Actual (Sept 2020 – Aug 2021)		Forecast (Jan 2022 – Dec 2022)
		<i>Previous license period (Sept 2020 – Dec 2020)</i>	<i>Current license period (Jan 2021 – Aug 2021)</i>	
Gajah Mati Estate		126.47	3,193.22	
Pelantoh Estate		-	706.79	
Tebak Estate		-	1,157.23	
Jernih Estate		-	1,171.61	
Total		6,355.32		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Jan 2021 – Dec 2021)	Actual (Sept 2020 – Aug 2021)		Forecast (Jan 2022 – Dec 2022)
		<i>Previous license period (Sept 2020 – Dec 2020)</i>	<i>Current license period (Jan 2021 – Aug 2021)</i>	
3rd Party FFB suppliers	N/A	18,303.54	11,954.63	N/A
Total	-	30,258.17		-

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	September 2020	15,868.56	6,272.21	22,140.77
2	October 2020	16,645.87	5,982.72	22,628.59
3	November 2020	15,952.21	3,415.85	19,368.06
4	December 2020	11,475.52	2,632.76	14,108.28
5	January 2021	7,866.24	817.37	8,683.61
6	February 2021	7,309.52	906.45	8,215.97
7	March 2021	10,022.23	1,633.54	11,655.77
8	April 2021	9,616.77	1,390.34	11,007.11
9	May 2021	10,706.41	1,336.37	12,042.78
10	June 2021	7,175.00	1,207.67	8,382.67

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

11	July 2021	14,105.08	2,547.83	16,652.91
12	August 2021	15,081.26	2,115.06	17,196.32
TOTAL		141,824.67	30,258.17	172,082.84

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (Jan 2021 – Dec 2021)	Actual (Sept 2020 – Aug 2021)		Forecast (Jan 2022 – Dec 2022)
	<i>Previous license period (Sept 2020 – Dec 2020)</i>	<i>Current license period (Jan 2021 – Aug 2021)</i>	
FFB	FFB		FFB
170,700.00	59,942.16	81,882.51	161,090.00
CPO (OER: 19.42%)	CPO (OER: 18.70%)		CPO (OER: 22.56%)
31,361.36	11,082.12	15,442.33	36,343.10
PK (KER: 4.36%)	PK (KER: 4.15%)		PK (KER: 5.04%)
7,040.96	2,457.06	3,422.16	8,112.00

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	September 2020	2,927.71	641.49
2	October 2020	3,329.43	698.91
3	November 2020	2,759.13	604.57
4	December 2020	2,065.85	512.09
5	January 2021	1,390.69	331.66
6	February 2021	1,300.01	284.45
7	March 2021	2,062.68	466.75
8	April 2021	1,733.41	447.94
9	May 2021	2,135.33	532.36
10	June 2021	1,330.25	297.91
11	July 2021	2,501.93	618.03
12	August 2021	2,988.03	443.06
TOTAL		26,524.45	5,879.22

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

11. Summary of Actual Volume sold					
Current License period (Jan 2021 – Aug 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	11,147.78	-	-	-	11,147.78
PK (MT)	3,706.84	-	-	-	3,706.84
Credits	-	-	-	-	-
Previous License period (Sept 2020 – Dec 2020)					
CPO (MT)	8,901.04	-	-	-	8,901.04
PK (MT)	2,115.07	-	-	-	2,115.07
Credits	-	-	-	-	-

Notes:

1. Conventional is RSPO certified material but sold as non-RSPO.
2. 300.23 mt PK Carried Forward from Dec 2020 to Jan 2021.

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.	Sept 2020	TR-04eb0c71-7cd5	1,500.00	-
2.	Sept 2020	TR-da4e69e8-a131	500.00	-
3.	Sept 2020	TR-13f65993-92f7	236.36	-
4.	Sept 2020	TR-f921ef25-1db2	7.20	-
5.	Sept 2020	TR-902842e2-5287	372.03	-
6.	Sept 2020	TR-1eebd73e-d9e6	-	207.90
7.	Sept 2020	TR-f799e77e-12ee	-	462.30
8.	Oct 2020	TR-78da44ef-0733	500.00	-
9.	Oct 2020	TR-ec85e625-8a26	500.00	-
10.	Oct 2020	TR-ae3a75f3-0215	1,000.00	-
11.	Oct 2020	TR-c15a79eb-86e3	500.00	-
12.	Oct 2020	TR-29eebf5c-8c20	-	7.10
13.	Oct 2020	TR-7f8114cf-dffd	-	194.48
14.	Oct 2020	TR-78dd5d0f-ee6d	-	540.00
15.	Nov 2020	TR-14c8b57d-6f3f	500.00	-
16.	Nov 2020	TR-2947ccc5-0ceb	1,000.00	-
17.	Nov 2020	TR-6549cb18-e481	500.00	-

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

18.	Nov 2020	TR-3428d1de-f20f	12.72	-
19.	Nov 2020	TR-d7685a19-e5f2	200.00	-
20.	Nov 2020	TR-3a022beb-8c20	124.03	-
21.	Nov 2020	TR-7f1e6ed2-4f03	-	8.72
22.	Nov 2020	TR-7c7b0093-a64c	-	540.00
23.	Nov 2020	TR-1d5216d7-1860	-	14.05
24.	Nov 2020	TR-598d1211-9b18	-	120.00
25.	Nov 2020	TR-7bc8e3fe-1eb7	-	20.52
26.	Dec 2020	TR-b6358ec7-2426	200.00	-
27.	Dec 2020	TR-8748ff1f-d427	290.47	-
28.	Dec 2020	TR-3ddaf5b9-1db4	458.23	-
29.	Dec 2020	TR-54279d4c-403d	500.00	-
30.	Jan 2021	TR-c47242e7-7aab	219.27	-
31.	Jan 2021	TR-dbb8f980-3dc7	62.4	-
32.	Jan 2021	TR-5f73791c-7672	181.09	-
33.	Jan 2021	TR-f59dda6d-6b13	237.30	-
34.	Jan 2021	TR-b0a723a5-4320	-	247.30
35.	Jan 2021	TR-6d5af429-7397	-	121.27
36.	Jan 2021	TR-de160632-4298	-	37.99
37.	Jan 2021	TR-a6fbd41b-4e3f	-	493.29
38.	Feb 2021	TR-b1591d35-18a6	351.24	-
39.	Feb 2021	TR-9a9086d4-1873	-	158.25
40.	Feb 2021	TR-ecb78f84-b053	-	77.70
41.	Mar 2021	TR-40a17215-4167	300.00	-
42.	Mar 2021	TR-abda2f91-0556	467.11	-
43.	Mar 2021	TR-ca0b80a0-01bc	430.68	-
44.	Mar 2021	TR-7af15880-f73b	727.55	-
45.	Mar 2021	TR-7df0d44d-dabd	-	64.70
46.	Mar 2021	TR-74d356ad-78de	-	325.00
47.	Mar 2021	TR-55f66bbd-639b	-	166.75
48.	Apr 2021	TR-d7a256a3-f316	600.00	-
49.	Apr 2021	TR-ec8248cd-3726	600.00	-
50.	Apr 2021	TR-4ab8fdeb-a574	500.00	-
51.	Apr 2021	TR-d8d1f34f-884e	-	3.94
52.	Apr 2021	TR-d322790f-f940	-	116.06
53.	Apr 2021	TR-2681a7bb-8d1e	-	370.30

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

54.	May 2021	TR-dc608fea-37ba	500.00	-
55.	May 2021	TR-34b0e959-9b07	6.30	-
56.	May 2021	TR-f8d540a8-ef8e	200.00	-
57.	May 2021	TR-63eca644-3a9c	-	317.74
58.	June 2021	TR-4f0d2736-9fa3	704.49	-
59.	June 2021	TR-b437c60f-7491	500.00	-
60.	June 2021	TR-bbb87bb6-6f7e	-	117.26
61.	Jul 2021	TR-72d054b7-a206	500.00	-
62.	Jul 2021	TR-67c43583-37da	84.22	-
63.	Jul 2021	TR-841c929c-9d87	81.53	-
64.	Jul 2021	TR-854a3320-29bc	1,100.00	-
65.	Jul 2021	TR-470f2bb9-7a10	500.00	-
66.	July 2021	TR-4245aee9-c1f1	-	369.22
67.	July 2021	TR-270ca767-07cc	-	98.16
68.	Aug 2021	TR-9c792639-22ae	195.39	-
69.	Aug 2021	TR-e2656c08-821b	700.00	-
70.	Aug 2021	TR-c7e718c6-0add	300.00	-
71.	Aug 2021	TR-f9249f44-4e7a	201.10	-
72.	Aug 2021	TR-3f2a18ce-bcff	29.17	-
73.	Aug 2021	TR-41a7c7b1-1be7	200.00	-
74.	Aug 2021	TR-9abcc2e3-f4ce	10.74	-
75.	Aug 2021	TR-eb0dffcc-509b	200.00	-
76.	Aug 2021	TR-9dcca5d-3645	173.75	-
77.	Aug 2021	TR-140c9612-63f2	157.73	-
78.	Aug 2021	TR-ee5f8e71-2a9d	126.72	-
79.	Aug 2021	TR-81cd4771-4629	-	447.13
80.	Aug 2021	TR-a73b6e27-bd5a	-	174.78
TOTAL			20,048.82	5,821.91

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)
-	-	-	-	-
TOTAL				

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

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

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)
-	-	-	-
TOTAL			-

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year (Jan 2021 – Dec 2021)			Actual (Sept 2020 – Aug 2021)			Forecast (Jan 2022 – Dec 2022)		
	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						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License 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

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **1- 3/11/2021**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **11/1/2022**. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Sungai Tong POM	✓	✓	✓	✓	✓
Jaya Estate	✓	-	-	✓	-
Fikri Estate	-	✓	-	-	✓
Tayor Estate	-	-	✓	-	-
Pelong Estate	-	✓	-	-	✓
Jerangau Estate	-	-	✓	-	-
Pinang Emas Estate	✓	-	-	✓	-

Tentative Date of Next Visit: October 31, 2022 - November 2, 2022

Total Number of Mandays: 9 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Vijay Kanna Pakirisamy (VKP)	Team Leader	<p>Education: He holds a Bachelor Degree in Agribusiness Science Management with Honours from University Utara Malaysia.</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.</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, Endorsed RSPO SCCS Lead Auditor Course in August 2020, Endorsed MSPO Lead Auditor Course in November 2019 and attended SMETA Requirements Training in April 2021.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of Occupational, Health & Safety, Environment, estate best practises and supply chain requirements.</p> <p>Language proficiency: He is fluent in Bahasa Malaysia and English languages.</p>
Mohamed Hidhir Zainal Abidin (MHZ)	Team Member	<p>Education: He holds a Bachelor Degree in Chemical Engineering from National University of Malaysia.</p> <p>Work Experience: He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He had been involved in RSPO auditing since May 2012 for various companies in Malaysia.</p> <p>Training attended: ISO 9001, ISO 140001, 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: During this assessment, he assessed on the aspects of legal, social, and stakeholder engagement.</p> <p>Language proficiency: He is fluent in Bahasa Malaysia and English languages.</p>
Muhamad Naqiuddin Mazeli (MNM)	Team Member	<p>Education: He holds a Bachelor of Science Horticulture from University Putra Malaysia.</p> <p>Work Experience:</p>

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

		<p>11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also supports in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company.</p> <p>Training attended: ISO 9001: 2015 LA Training (2019), ISO 14001: 2015 LA Training (2018), ISO 45001: 2018 LA Training (2018), HCV & HCS Training (2019), RSPO P&C LA Training (2018), MSPO LA Training (2018), SMETA Training (2021)</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of Occupational, Health & Safety, Environment and estate best practises.</p> <p>Language proficiency: He is fluent in Bahasa Malaysia and English languages.</p>
<p>Muhammad Fadzli Masran (MFM)</p>	<p>Team Member (Major NC Close Out)</p>	<p>Education: He holds Bachelor Degree in Forestry Science, from University Putra Malaysia.</p> <p>Work Experience: He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. Fluent in Bahasa Malaysia and English Language.</p> <p>Aspect covered in this audit: During this assessment, he verified the outstanding Major Non-Conformity that was raised during the assessment.</p> <p>Language proficiency: He is fluent in Bahasa Malaysia and English languages.</p>

Accompanying Persons:

Name	Role
Valence Shem	Qualifying Reviewer
Nor Halis Abu Zar	Observer

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

1.3 Assessment Plan

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

Date	Time	Subjects	VKP	MHZ	MNM
Sunday, 31/10/2021	1500 - 1900	Auditors travel to Kuala Terengganu.	✓	✓	✓
Monday, 01/11/2021 Jaya Estate	0800 - 0900	Travel from Kuala Terengganu to Sungai Tong Complex	✓	✓	✓
	0900 - 0930	Opening Meeting: - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).	✓	✓	✓
	0930 - 1230	Jaya Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	1000 - 1200	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) – Sungai Tong POM & Jaya Estate	-	✓	-
	1230 - 1330	LUNCH BREAK			
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
	Tuesday, 02/11/2021 Pinang Emas Estate	0800 - 0900	Travel from Kuala Terengganu to Pinang Emas Estate	✓	✓
0900 - 1230		Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
1000 - 1200		Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) – Pinang Emas Estate.	✓	✓	✓
1230 - 1330		LUNCH BREAK			

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

Date	Time	Subjects	VKP	MHZ	MNM
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Wednesday 03/11/2021	0800 - 0900	Travel from Kuala Terengganu to Sungai Tong Palm Oil Mill	✓	✓	✓
Sungai Tong Palm Oil Mill	0900 - 1230	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, Lab, weighbridge and palm product storage area, etc.	✓	✓	✓
	1230 - 1330	LUNCH BREAK			
	1330 - 1600	Document review P1 – P7: Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCCS general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	✓	✓	✓
	1600 - 1630	Verify any Outstanding Issues and Preparation for Closing Meeting	✓	✓	✓
	1630 - 1700	Closing Meeting	✓	✓	✓
	1700	Auditors travel back to Kuala Terengganu	✓	✓	✓

Major Nonconformity Closure Assessment Plan

Date	Time	Subjects	MFM
11/01/2022	1130 – 1330	Audit travel to Sungai Tong POM	✓
Sungai Tong Palm Oil	1400 – 1430	Opening Meeting: <ul style="list-style-type: none"> - Opening Presentation by Audit team leader. - Confirmation of assessment scope and finalize Audit plan 	✓

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

Mill	1430 – 1630	Verification on Major NC: 2125413-202111-M1 <ul style="list-style-type: none"> - Site observation ,workers interview (individual and group session) if necessary - Document review – implemented evidence. 	✓
	1630 – 1700	Closing Meeting	✓
	1700	Audit Team travel back to Kuala Lumpur	✓

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. Please refer to Approved Time Bound Plan for details on the mills and estates of TDM Plantations Sdn. Bhd. Group.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	Except for the newly acquired Bukit Bidong Estate, all estates and mills in Malaysia has been certified within five years. Certification for sites in Indonesia has been put on hold pending divest of properties there.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	Yes there is a newly acquired estate from Tabung Haji Plantations completion on 31 July 2020. The newly acquired Bukit Bidong Estate has been planned to be audited and certified by 2023.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	As of now there are no deviations on the period required for approval by the RSPO Secretariat.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No, there are no changes to the time bound plan since the last audit. ACOP Reporting has been verified and found to be consistent.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No, there has not been any isolated lapses in the implementation of the plan.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No, there is no fundamental failure in implementation of the plan.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	No replacement after dates defined in this Criterion 7.12 involving primary forest. Newly acquired Bukit Bidong Estate is in progress of arrangement for assessment to determine any requirement to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new plantings since 1st January 2010 that requires compliance with the RSPO New Plantings Procedure.	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance	Based on RSPO RACP tracker, there are 0 cases of Management Units with potential	Complied

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

with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	liability, LUCA and Concept Note requirements.	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No labour dispute reported in the uncertified units.	Complied
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance reported in the uncertified units.	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. As part of the RSPO P&C compliance, internal audit has been conducted at the uncertified units. Report of improvement was provided for site's further improvement.	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. There were 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 estate.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes. Stakeholders including NGO were consulted in the uncertified units and documented.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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

Approved Time Bound Plan

Details of Time Bound Plan as submitted by TDM Plantation Sdn. Bhd.

No.	Name of the Estate and Mills		TBP for certification	Status as at 26/10/2021	Any unresolved (Labour Dispute / Land conflicts / Legal Non-Compliance etc)
1	TDM Plantation Sdn. Bhd. Tebak Estate , Kemaman, Terengganu, Malaysia	Supply base for TDM Plantation Sdn. Bhd. Kemaman Palm Oil Mill, Kemaman, Terengganu, Malaysia.	November 2013	Certified	None
2	TDM Plantation Sdn. Bhd. Pelantoh Estate , Kemaman, Terengganu, Malaysia		November 2013	Certified	None
3	TDM Plantation Sdn. Bhd. Jernih Estate , Kemaman, Terengganu, Malaysia		November 2013	Certified	None
4	TDM Plantation Sdn. Bhd. Air Putih Estate , Kemaman, Terengganu, Malaysia		November 2013	Certified	None
5	TDM Plantation Sdn. Bhd. Gajah Mati Estate , Dungun, Terengganu, Malaysia		November 2013	Certified	None
6	TDM Plantation Sdn. Bhd. MAIDAM Estate , Dungun, Terengganu, Malaysia		November 2013	Certified	None
7	TDM Plantation Sdn. Bhd. Tayor Estate , Setiu, Terengganu, Malaysia	Supply base for TDM Plantation Sdn. Bhd. Sungai Tong Palm Oil Mill, Setiu Terengganu, Malaysia.	December 2013	Certified	None
8	TDM Plantation Sdn. Bhd. Pelong Estate , Setiu, Terengganu, Malaysia		December 2013	Certified	None
9	TDM Plantation Sdn. Bhd. Jaya Estate , Setiu, Terengganu, Malaysia		December 2013	Certified	None

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

10	TDM Plantation Sdn. Bhd. Fikri Estate , Setiu, Terengganu, Malaysia		December 2013	Certified	None
11	TDM Plantation Sdn. Bhd. Pinang Emas Estate , Dungun, Terengganu, Malaysia		December 2013	Certified	None
12	TDM Plantation Sdn. Bhd. Jerangau Estate , Ajil, Terengganu, Malaysia		December 2013	Certified	None
13	TDM Plantation Sdn. Bhd. Bukit Bidong Estate , Permaisuri, Terengganu, Malaysia	To be determined	Latest by December 2023	In progress	None

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 One (1) Critical; Three (3) Minor nonconformities and One (1) Opportunity For Improvement raised. The Sungai Tong 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 #	2125413-202111-M1	Date Issued	03/11/2021
Due Date	31/01/2022	Date of nonconformity Closure	11/01/2022
Clause & Category (Critical / Minor)	3.6.1 (Critical)		
Statement of Nonconformity:	The risk assessment and mitigation methods were not implemented comprehensively.		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p><u>Pinang Emas Estate</u></p> <ol style="list-style-type: none"> Baseline Audiometric Test was conducted by Si Energy Sdn Bhd (1202037P) on 19th October 2020 for 28 workers deemed to be exposed to excessive noise in the estate. The results indicated the 12 of them were found to have hearing impairment and 10 of them were noted to have Hearing Loss. As per Occupational Safety and Health (Noise Exposure) Regulation 2019, those with hearing loss, hearing impairment and permanent standard threshold shift are required to see Occupational Health Doctor for further Medical Examination. As of to date, there were no evidence that the 23 workers were referred to an Occupational Health Doctor for further Medical Examination. HIRARC for Tractor, Kubota and Hooklift Tractor have been identified. Nevertheless, the Hazard identification for the mentioned machinery works was not comprehensively identified as it did not state the hazards related to excessive noise during the operation. 		
Corrections:	<ol style="list-style-type: none"> To arrange for all those 23 employees to see an Occupational Health Doctor (OHD) for further medical examination immediately. To identify and include hazards related excessive noise during operation for Tractor, Kubota and Hooklift Tractor. 		
Root Cause Analysis:	<ol style="list-style-type: none"> Hearing impairment must be verified by the OHD thus the delay in the review since the management is waiting the confirmation from OHD. The HIRARC for Tractor, Kubota and Hooklift Tractor is not properly identified and reviewed by the estate. Estate management was occupied with COVID19 outbreak in the estate and also the vaccination program of all workers and staffs. 		

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

	<p>HIRARC usually been reviewed every year (Q1) and if needed to be revised, it will be revised immediately but during this pandemic, many obstacles happened suddenly. Normally HIRARC will be reviewed upon confirmation of occupational accidents.</p>
Corrective Actions:	<ol style="list-style-type: none"> PIC will keep on monitoring the excessive noise exposure monitoring as per OHD recommendation. For example, annual audiometric test. This compliancy is also monitored by Sustainability and Compliance Unit at HQ level. The existing HIRARC for Tractor, Kubota and Hooklift Tractor have been reviewed and revised immediately after the audit. In the meantime, the existing documentation update (in this case; HIRARC) practices will be continuously conducted and monitored by the PIC together with HIRARC review committee.
Assessment Conclusion:	<p><u>Major NC Close Out Verification</u></p> <p>From 23 personnel attend the Noise Risk Assessment Baseline on 19/10/2021, 5 of the employee has resigned from the estate. The estate has sent the remaining 18 employee for OHD examination on 08/12/2021. The examination was conducted by OHD with DOSH reg. no. HQ/08/DOC/00/272.</p> <p>Reviewed the OHD examination report. From the results, 17 employee were found with hearing impairment and 1 employee were referred to ENT specialist due to no occupational related disease. The employee with hearing impairment was reported to DOSH through JKPP 7 form on 09/12/2021 by the OHD. The OHD has explain the results to the respective employee during the examination. Reviewed the acknowledgment of understanding by the employee dated 08/12/2021.</p> <p>The estate has reviewed the HIRARC for Loader Tractor, Loader Kubota Hook Lift Tractor and Tractor c/w 8/10 Hook Lift trailer on 08/11/2021. The reviewed has been include included hazards for Loud Noise (>82 dBA).</p> <p>All the corrective action and evidence of implementation were found to be adequate. The Major NC closed on 11/01/2022.</p>

Non-conformity			
NCR Ref #	2125413-202111-N1	Date Issued	03/11/2021
Due Date	Next Surveillance Assessment	Date of nonconformity Closure	"Open"
Clause & Category (Critical / Minor)	3.4.2 (Minor)		
Statement of Nonconformity:	Social management and monitoring plan was not comprehensively developed with participation of affected stakeholders		
Requirement Reference:	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.		
Objective Evidence:	<p><u>Pinang Emas Estate</u></p> <p>Based on SIA management plan dated 1/10/2021, specific issues with regards to contractor management and due diligence were not identified in the management plan. Non-compliance issues related to lawful deduction (SOCISO and EPF) and contract of service was observed and recorded. Further interview with the</p>		

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

	contractor, SF Suria Enterprise has confirmed on the lawful deduction and contract of service issues which not in lined with Employment Act 1955.
Corrections:	To update the SIA management plan and include contractor management and due diligence issue immediately.
Root Cause Analysis:	Social management and monitoring plan was not comprehensively developed because the issues are not properly captured or discussed during stakeholder meeting or via questionnaire submitted by the estate.
Corrective Actions:	In order to capture the issues, the training/ stakeholder meeting should be conducted with addressing/ discussed contractor management issues and contractors' compliance with the legal requirement.
Assessment Conclusion:	The correction and corrective action plan are accepted. Effectiveness of corrective action taken will be further verified in the next surveillance assessment.

Non-conformity			
NCR Ref #	2125413-202111-N2	Date Issued	03/11/2021
Due Date	Next Surveillance Assessment	Date of nonconformity Closure	"Open"
Clause & Category (Critical / Minor)	2.2.2 (Minor)		
Statement of Nonconformity:	Evidence of legal due diligence of all contracted third parties was not effectively demonstrated.		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
Objective Evidence:	<p><u>Contract of service @ employment contract</u></p> <ol style="list-style-type: none"> SF Suria Enterprise - Contract of service dated 1/1/21 was not comprehensively include pertinent clauses as required under Employment Act 1955. Rest day, annual leave and medical leave entitlement were not included in the contract. Rate of pay on rest day and public holiday were also not clearly explained in the said contract. Abdullah Bin Musa - Contract of service dated 1/1/21 was not comprehensively include pertinent clauses as required under Employment Act 1955. Rest day, annual leave and medical leave entitlement were not included in the contract. Rate of pay on rest day and public holiday were also not clearly explained in the said contract. <p><u>Lawful deduction</u></p> <p>SF Suria Enterprise - Based on latest pay slip for worker ID 69###11- #1- ##47 September 2021, no lawful deduction made for EPF,SOCSSO/EIS recorded.</p>		
Corrections:	A meeting has been conducted with the contractors, SF Suria Enterprise, and Abdullah Muda on 9/11/2-21. Both contractors have been briefed on the		

	Employment Act 1955 requirement such as to prepare a complete format of employment contract and to make deduction and contribution of EPF and SOCSO/IES to their workers. They had to ensure that the deduction and contribution was stated in the worker's payslip.
Root Cause Analysis:	There is available agreement between these two contractors with Pinang Emas Estate which indicate that the contractors had to comply with the RSPO and MSPO requirement. However, the contractors do not take it seriously and ignore the requirement because there is no proper guideline/training from the estate.
Corrective Actions:	To conduct proper training to the contractors on the requirement of Employment Act 1955 and to assist the contractors to make proper deduction (EPF, SOCSO/EIS) as per requirement under Employment Act 1955.
Assessment Conclusion:	The correction and corrective action plan are accepted. Effectiveness of corrective action taken will be further verified in the next surveillance assessment.

Non-conformity			
NCR Ref #	2125413-202111-N3	Date Issued	03/11/2021
Due Date	Next Surveillance Assessment	Date of nonconformity Closure	"Open"
Clause & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	Found inappropriate disposal of waste material in Sungai Tong POM		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<ol style="list-style-type: none"> Based on the Waste Management Plan, it was found that empty chemical containers, waste of lead acid batteries and fluorescent tubes/lamps have been identified as Scheduled waste (SW 409, 102 and 109). However, from the inventory records (Record Number: AS(B)T:31/152/000/008) and latest record of SW Disposal, there were no evidence of inventory and disposal of SW 409, 102, and 109 in the mill. The used N-Hexane was identified as Scheduled Waste in Sungai Tong POM. Based on the interview, the used N-Hexane has been given back to the supplier. However there were no evidence that showed that the supplier has approval from DOE to handle the scheduled waste. 		
Corrections:	<ol style="list-style-type: none"> To register empty container (SW409), fluorescent tubes/ lamps (SW109) and used N-Hexane (SW322) into eSWIS system. In progress to get approval from DOE to dispose the waste oil through the burning process at Boiler Station. 		
Root Cause Analysis:	No generation and disposal record of the stated scheduled waste because there is misunderstanding with the approval given by DOE.		
Corrective Actions:	The quantity of SW409, SW109 and SW322 will be updated monthly and dispose-off accordingly through licensed scheduled waste facility/ transporter as per Environmental Quality (Scheduled Wastes) Regulation 2005.		

Assessment Conclusion:	The correction and corrective action plan are accepted. Effectiveness of corrective action taken will be further verified in the next surveillance assessment.
-------------------------------	--

Opportunity for Improvements

OFI #	Description
OFI 1	2125413-202111-I1 - The estate shall further ensure that the estate workers are aware of the availability of wellington boots free of charge for them so that they do not purchase them by themselves.

Positive Findings

PF #	Description
PF 1	Good positive relationship maintained and highlighted by internal and external stakeholders
PF 2	Good cooperation by Management and Sustainability team and handling the audit.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1962048-202009-M1	Date Issued	24/09/2020
Due Date	23/12/2020	Date of nonconformity Closure	23/12/2020
Clause & Category (Critical / Minor)	6.2.2 (Critical)		
Statement of Nonconformity:	Employment contracts which detailing conditions of employment was not in compliance with Employment Act 1955.		
Requirement Reference:	Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.		
Objective Evidence:	<p>Sg Tong POM Sample of employment contracts for worker's ID (SM0900170, SM0900256, SM0900219, SM00084, SM00035, SM0800102, SM0900254, SM0900252);</p> <ul style="list-style-type: none"> No details of overtime rates for normal day work, rest day work and holiday work. No details of ordinary rate of pay for rest day work and holiday work. - No clear clause on termination of service other than disciplinary action. 		
Corrections:	The details as mentioned in objective evidence will be included in the new/revised employee's employment contract and signed by each employee.		

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

Root Cause Analysis:	The format provided by HR is in line with Collective Agreement MAPA / NUPW 2019. Which also in line with Employment Act 1955. There are missing clauses on overtime rates, ordinary rate of pay for rest day work and holiday work, clause on termination of service due to there is no specific guideline to construct the employment contract.
Corrective Actions:	TDMP will provide workers with simplified version of MAPA/NUPW Agreement. For new employee, the revised offer letter will be issued together with simplified version of MAPA/NUPW Agreement. HR will circulate the new standardised offer letter for all estates and mills.
Assessment Conclusion:	<p><u>Major NC Close Out Verification:</u></p> <p>TDMP HR has revised the employment contract version 29th November 2020. Refer to circular TDMP/SM/3/01.01 dated 29th November 2020. All pertinent clause as Employment Act 1955 has been included in the contract. Based on interview with MAPA/NUPW representative and mill operators, have confirmed that they have signed the new contract and briefed on the terms and conditions stipulated in the contract.</p> <p>Agreement contract checked for (SM0900170, SM0900256, SM0900219, SM00084, SM00035, SM0800102, SM0900254, SM0900252, SM0900264, SM0900262, SM00050, SM900152) dated 1/12/2020.</p> <p>The corrective action has been effectively implemented based on evidence verification and workers consultation. Thus, the NC was closed on 23/12/20.</p> <p><u>ASA1 3 Verification</u></p> <p>Verified sample of payslips at Sg Tong estate, workers ID SM0900221, SM00018, SM0900240, SM0900271, SM0900230, SM0900185, SM0900272, SM00037 were checked and verified. The new contract signed on 1/12/20 available for the above sample workers. No recurrence of issue related to contract observed. The previous Major NC remains closed.</p>

Non-conformity			
NCR Ref #	1962048-202009-M2	Date Issued	24/09/2020
Due Date	23/12/2020	Date of nonconformity Closure	23/12/2020
Clause & Category (Critical / Minor)	3.4.1 (Critical)		
Statement of Nonconformity:	As sampled found Environmental aspect identification and impact assessment not properly conducted where a environmental legal references stated found not properly updated and accurate. Methodology of assessment of significant Aspects found improper as decided no high potential non-compliance to environmental regulations. Therefor no Environmental Management Plan required and established accordingly.		
Requirement Reference:	In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.		

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

Objective Evidence:	Found Environmental Aspect and Impact Identification Form FY 2019 not signed and approved at Jerangau Estate. Sighted no Shortage of landfill as a potential result from was disposal of wastes under list of impacts. A reference to environmental legal requirements as sighted found incorrect such as Environmental Quality (Clean Air) Regulation 1978, Environmental Quality (Scheduled Waste) Regulations 1989, Environmental Quality Regulations 1996, Environmental Quality (Noise Exposure) Regulations 1996. The methodology of assessment of significant Aspects found improper as decided no high potential non-compliance to environmental regulations for all documents. Therefore, no Environmental Management Plan required and established accordingly.
Corrections:	Revision of the current Environmental Aspect and Impact Identification Form must be done.
Root Cause Analysis:	This happened because there were changes of staff and new appointment in Jerangau estate management. The Person In-Charge (PIC) was not properly trained and familiar with the EIA, thus the document is not updated against applicable law & regulations.
Corrective Actions:	The current Environmental Aspect and Impact Identification Form will be reviewed and revised accordingly. To conduct the training so that the EIA established is updated accordingly.
Assessment Conclusion:	<p><u>Major NC Close Out Verification:</u></p> <p>Environmental Impact Assessment (EIA) and environmental management plan has been established with based latest revision of the EIA. Correct evaluation of risk rating and updated legal reference included in the newly revised register. Sample of EIA under herbicide spraying, rubbish disposal were checked and verified. Environmental management plan FY 2020 was developed and included all significant environmental impacts identified from the assessment. Interview with the management has confirmed the understanding of EIA identification and evaluation process. Training was also carried out by external party on the understanding of EIA and EIE for all TDMP operating units management team on 6th December 2020. Records of training and related training module was made available for verification. The corrective action has been effectively implemented based on document verification and consultation with the management team. Thus, the NC was closed on 23/12/20.</p> <p><u>ASA1 3 Verification</u></p> <p>In Jaya estate, the environmental aspect and impact and also evaluation been reviewed on 01/09/2021. Correct evaluation of risk rating and updated legal reference included in the newly revised register. Training was also carried out by external party on the understanding of EIA and EIE for all TDMP operating unit's management team on 06/12/2020. Thus, major NC remained close.</p>

Non-conformity			
NCR Ref #	1962048-202009-N1	Date Issued	24/09/2020
Due Date	03/11/2021	Date of nonconformity Closure	03/11/2021

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

Clause & Category (Critical / Minor)	6.2.6 (Minor)
Statement of Nonconformity:	No prevailing wages and in-kind benefits assessment conducted by Unit of Certification.
Requirement Reference:	A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.
Objective Evidence:	No assessment of the prevailing wages and in-kind benefits at Sg Tong POM certification unit.
Corrections:	The prevailing wages assessment must be done before the next coming audit.
Root Cause Analysis:	Wages paid to the workers are according to Minimum Wages Order 2020 which is RM46.15 per day. No assessment of prevailing wages has yet been done.
Corrective Actions:	Assessment of prevailing wages or Decent Living Wages will be done based on the RSPO Guidance On Calculating Prevailing Wages dated 11th November 2019.
Assessment Conclusion:	Benchmark for prevailing wages calculation has been developed based on pilot project at Air Putih Estate. Based on the calculation, total of prevailing wages recorded at RM 2,157. No recurrence of issue observed thus the previous minor NC was closed on 03/11/2021.

Non-conformity			
NCR Ref #	1962048-202009-N2	Date Issued	24/09/2020
Due Date	03/11/2021	Date of nonconformity Closure	03/11/2021
Clause & Category (Critical / Minor)	6.5.3 (Minor)		
Statement of Nonconformity:	No evidence that management has assessed the needs of new mothers, in consultation with the new mothers as to date.		
Requirement Reference:	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.		
Objective Evidence:	Consultation process with new mothers has yet to be carried out. Based on meeting minutes at visited estates and mill, no discussion on the needs of new mothers to breastfeed up to nine months and adequate space and paid breaks should be provided to enable mothers with infants 24 months or younger to breastfeed or express and store breast milk with privacy. Interview with gender committee chairman, as to date no assessment conducted yet for new mother's needs.		
Corrections:	To conduct assessment for new mother using provided guideline as a reference.		
Root Cause Analysis:	This requirement is a new indicator in RSPO P&C 2018. TDMP itself, as at the time being doesn't have the written procedure on how to handle new mother properly. Estate also didn't receive any grievance or permission as mentioned in objective evidence during gender committee meeting.		
Corrective Actions:	TDMP will prepare the policy/procedures on new mothers and presented in Gender Committee for each estates and mills.		

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

Assessment Conclusion:	Assessment for new mothers' needs was done from 16-20/08/2021 via google form named "Kaji Selidik Ibu Mengandung & Menyusu to female workers in the estate and mill. Recommendation and further action required will be included in the SIA management plan. For example, at Sg Tong POM mother's care room is available for new mother. No recurrence of issue observed thus the previous minor NC was effectively closed on 03/11/2021.
-------------------------------	---

Non-conformity			
NCR Ref #	1962048-202009-N3	Date Issued	24/09/2020
Due Date	03/11/2021	Date of nonconformity Closure	03/11/2021
Clause & Category (Critical / Minor)	2.1.2 (Minor)		
Statement of Nonconformity:	Sighted a Legal Register established for FY 2020 not stating correct section, applicable legislation and current updated legal and other requirements applicable to Estate and Palm Oil Mill operations.		
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:	<p>Estate Legal Register FY 2020 (Tayor and Jerangau), sighted as stated:</p> <ul style="list-style-type: none"> • Occupational Safety and Health 1994 was not properly stating the relevant sections of the requirements. • Environmental Quality Act 1974 (Amend) 2012 not mentioning Section 49A for Competent Person for Scheduled Waste Management, Section 34B related to Prohibition of placing and deposit of Scheduled Waste, Sect 27 mentioning about Prohibition of polluting Malaysian Waters which not applicable. • Revoked Occupational Safety and Health (Classification, Packaging and Labelling) Regulations 1997, Environmental Quality (Clean Air) Regulation 1978, Environmental Quality (Sewage and Industrial Effluent) Regulations 1979, Factories and Machinery (Noise Exposure) Regulations 1989 still included. • Occupational Safety and Health (Classification, Labelling and Safety Data Sheet of Hazardous Chemicals) Regulations 2013, Environmental Quality (Clean Air) Regulation 2014, OSH (Noise Exposure) Regulation 2019. Factories and Machinery (PIC) Regulations 2014 and etc. • Fire Services (Fire Certificate) Regulations 2001 in compliance status found stated N/A. for Sg. Tong POM • Environmental Quality (Refrigerant Management) Regulations 1999 compliance status indicated as N/A. • Not included legislations such as Road Transport Act 1987, MPOB Act 1988, Control of Supply Act 1961 (Amend) 2006. 		
Corrections:	To setup committee member who are expert and aware in legislation so that the LRR (Legal Requirement Register) for both mills and estates are in line with the new related/applicable law & regulations which are critical to be updated.		

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

Root Cause Analysis:	The Person In-Charge (PIC) was not properly trained and familiar with the LRR, thus the document was not updated against applicable law & regulations.
Corrective Actions:	To revise the LRR to meet with applicable new law & regulations. To conduct the training so that the LRR established is updated accordingly.
Assessment Conclusion:	<ol style="list-style-type: none"> 1. TDM Plantation has revised the SOP; Procedure for Legal and other Requirements dated 01/01/2021; Edition: TDM/ESTATE/01; Revision; Estate – 00/2021. 2. A Legal Identification & Interpretation Training was conducted by QES Consultant Plt on 15/09/2021 for all PIC of TDM mill and estates to ensure familiarity and compliance towards all applicable legal requirements and updating of necessary documents. 3. Each operating units have establish a Legal Compliance Committee headed by the Mill/Estate Manager of the respective units to monitor changes and compliance to awards all applicable regal requirements. 4. The legal Register has been verified to have included all up to date applicable legal requirements. <p>Thus the minor non-conformity has been closed on 03/11/2021.</p>

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1687913-201808-M1	Major	2.1.3	04/10/2018	Closed on 25/11/2018
1687913-201808-M2	Major	SCCS 5.3.2	04/10/2018	Closed on 25/11/2018
1687913-201808-N1	Minor	6.10.4	04/10/2018	Closed on 25/09/2019
1828237-201906-M1	Major	2.1.1	26/09/2019	Closed on 23/12/2019
1828237-201906-M2	Major	4.7.2	26/09/2019	Closed on 23/12/2019
1828237-201906-M3	Major	4.7.2	26/09/2019	Closed on 03/12/2019
1962048-202009-M1	Major	6.2.2	24/09/2020	Closed on 23/09/2020
1962048-202009-M2	Major	3.4.1	24/09/2020	Closed on 23/09/2020
1962048-202009-N1	Minor	6.2.6	24/09/2020	Closed on 03/11/2021
1962048-202009-N2	Minor	6.5.3	24/09/2020	Closed on 03/11/2021
1962048-202009-N3	Minor	2.1.2	24/09/2020	Closed on 03/11/2021
2125413-202111-M1	Critical	3.6.1	03/11/2021	Closed on 11/01/2022
2125413-202111-N1	Minor	3.4.2	03/11/2021	"Open"
2125413-202111-N2	Minor	2.2.2	03/11/2021	"Open"

2125413-202111-N3	Minor	7.3.2	03/11/2021	"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 TDM Sungai Tong 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)
Contractor	ARJ Structure Sdn Bhd	Face To Face Interview
Contractor	SF Suria Enterprise	Face To Face Interview
Contractor	Anika Agency	Face To Face Interview
Government School	SMK Bukit Nenas	Face To Face Interview
Government School	SMK Sg Tong	Face To Face Interview
Government School	SK Kg Jaya	Face To Face Interview
Union	NUPW Representatives	Face To Face Interview
Internal Stakeholder	Gender Representatives	Face To Face Interview
Government School	Tadika Kemas Ladang Jaya	Face To Face Interview

Stakeholders comment	
1	<p>Feedbacks: Contractors & suppliers (SF Suria Enterprise, ARJ Structure Sdn Bhd, Anika Agency) The contractors/supplier has mentioned that they are not aware on the payment term with TDMP. However, no negative feedback highlighted by them. They were also aware on the code of business ethics with TDMP and the whistle-blowing policy which will protect them from any misconduct from the management.</p> <p>Audit Team verification and response: Management will further explained on payment term with the contractors and vendors/suppliers. This will be done during contract signing session and stakeholder meeting.</p>

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

2	<p>Feedbacks: SMK Bukit Nenas, SMK Sg Tong, SK Kg Jaya: Full support given by the estate management for any programme organized such as motivational talk and other religious activities. TDMP management is always open for any request or assistance whenever required.</p>
	<p>Audit Team verification and response: The management will maintain good relationship with the local communities and provide any CSR if necessary.</p>
3	<p>Feedbacks: Union Representatives (NUPW) Pinang Emas Estate NUPW representative has officially raised complaint to NUPW state secretary related to mandore allowance issue after being transferred to the new work station. Letter from NUPW state secretary has received by estate management requiring further explanation on the issue. This was also confirmed with Pinang Emas Estate’s NUPW representative during internal stakeholder consultation session.</p>
	<p>Audit Team verification and response: Estate management has submitted the official response to NUPW state secretary pertaining to the issue. Evidence of allowance paid to the affected mandore was submitted to NUPW. The NUPW representative has been informed and briefed on the resolution process. Further verified with the management team, the mandore has misinterpreted that the she has no longer entitled for the allowance. Total salary with paid allowance included however it was not explicitly written in the payslip. Verified salary payment for the latest 3 consecutive months has confirmed that allowance has been paid to the mandore.</p>
4	<p>Feedbacks: Gender Representatives They are aware of the function of the committee and reported that there was no sexual harassment case reported. They were given equal opportunity to work in the company.</p>
	<p>Audit Team verification and response: The management will ensure the welfare and safety of female workers are protected.</p>
5	<p>Feedbacks: Workers representative (Indonesia, Bangladesh): No issue with the management and always open for consultation and assistance. Equal opportunity to all workers regardless of their nationality, gender and race.</p>
	<p>Audit Team verification and response: No favouritism and all workers are equally treated.</p>
6	<p>Feedbacks: Tadika Kemas Ladang Jaya Kindergarten is located within Ladang Jaya Estate. Good cooperation given by the estate management towards maintaining the school building and any other assistance as and when required.</p>
	<p>Audit Team verification and response: Management will continue to assist whenever required.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Jaya Estate	Lease hold for 99 years	3,455.79	Yes	N/A	All estates within Sg Tong POM complex belongs to the

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

Kumpulan Ladang - Ladang Terengganu Sdn Bhd (Terengganu State Government Incorporated Company)	(Lease Period from 01/01/1973 – 31/12/2071) Under Perbadanan Memajukan Iktisad Negeri				Terengganu State Government Incorporated Company that owns 100% stake in TDM. Verified agreement between Perbadanan Memajukan Iktisad Negeri Terengganu and Kumpulan Ladang-Ladang Terengganu Sdn Bhd.
<u>Pinang Emas Estate</u> Kumpulan Ladang - Ladang Terengganu Sdn Bhd (Terengganu State Government Incorporated Company)	Lease hold for 99 years (Lease until 31/01/2075) Under Perbadanan Memajukan Iktisad Negeri	3,870.18	Yes	N/A	All estates within Sg Tong POM complex belongs to the Terengganu State Government Incorporated Company that owns 100% stake in TDM. Verified agreement between Perbadanan Memajukan Iktisad Negeri Terengganu and Kumpulan Ladang-Ladang Terengganu Sdn Bhd.




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

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.

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

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 Sungai Tong POM Certification Unit 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 Sungai Tong POM Certification Unit is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: VIJAY KANNA PAKIRISAMY	Name: HAJI SHAHBUDIN BIN USOP
Company Name: BSI SERVICES (M) SDN BHD	Company Name: SG TONG POM
Title: CLIENT MANAGER	Title: MILL MANAGER
Signature: 	Signature: <p>(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.)</p>  
Date: 13 th January 2022	Date: 13.01.2022

Appendix A: Summary of Findings

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

		<ul style="list-style-type: none"> Contributions to community development 	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Communication Flowchart with Mill/ Estate Management was developed where it has clearly described the process of request of information/ report. Timeline to respond and solve is within 28 working days. The company has implemented Request and Response Form for the stakeholders. Information available in Bahasa Malaysia and English.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>The company has implemented Form for records of Communication with Stakeholders to record all the requests from the stakeholders. Seen the requests from stakeholders as sighted in Jaya and Pinang Emas Estate. In Sg Tong POM found available Information Request Form (REV2.0/2017) used to record any request of RSPO information from POM.</p> <p>Jaya Estate – ECRL (East Cost Railway) request to conduct soil investigation. Refer to letter date 26/02/2021, ref: MRL/TECH-S3/LL/TDM/L/21/0019. TDM management has approved the request to conduct soil investigation in the estate.</p> <p>Sg Tong POM – NUPW Terengganu Branch secretary has requested to have a dialog session with the management and workers who left union. Letter dated 04/10/2021, ref: NUPW/TRG/10/2021 was verified. TDM management has approved and prepare the dialog session.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Available a procedure in Jaya and Pinang Emas Estate named Communication with Mill/Estate documented. Similar procedure available at Sg. Tong POM. The format is in a flowchart form defining flow of the consultation and communication process . The information reported shall be rectify according to type of communication. E.g. Action within 28 days in the procedure. If further action request is involved Head Office, then the management will submit the request to Head Office for further</p>	Complied

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

		approval and shall be rectified within 30 working day. All internal and external stakeholders were briefed on this procedure during stakeholder meeting as well as muster / rollcall meeting.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	The current list of contact and details of stakeholders and their nominated representative was updated in the stakeholder list FY2021 at each operating unit. Verified the list which has included vendor/supplier, authority and other interested party – DOSH/DOE etc, school and local community head etc.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	Available Work Ethical Policy stating ethical issues, maintaining workers right in recruitment, selection of workers, contracts. The policy also sighted during site visit at notice board outside Office of Pinang Emas Estate, Jaya Estate and Sg Tong POM. Sighted training attendance record during muster ground for Sg Tong POM on Notification of company policy to employee dated 11/04/2021.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Regular briefing on policies conducted to workers during morning muster, roll call and gatherings as mentioned above for internal stakeholders. Internal audit programme is used as a mechanism to monitor compliance and the implementation of the policy and overall ethical business practice.	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	Sungai Tong Certification Unit continues to comply with all verified legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and HQ. The sampled mill and estates had obtained and renewed license and permits as required by the law. Among others the licenses/permit verified were:	Complied

		<p><u>Sungai Tong POM</u></p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 500042704000; Processing Capability: 300,000 Mt FFB/Year; License Validity Period: 01/04/2021 – 31/03/2022. 2. Fire Certificate; Serial Number: 315974; Certificate Number: JBPM:TR/7/43/2018; Certificate Validity Period: 20/05/2021 – 19/05/2022. 3. DOE Compliance Schedule; License Number: 004090; Reference Number: AS(B)T: 31/152/000/008; License Validity Period: 01/07/2021 – 30/06/2022. 4. Energy Commission (Private Installation License); License Number: 2021/00718; Serial Number: 49000; Maximum Installation Capacity: 3845 kilowatt; License Validity Period: 14/03/2021 – 13/03/2022. <p><u>Jaya Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License (FFB); License Number: 501497502000; Estate Area: 3336.32; License Validity Period: 01/04/2021 – 31/03/2022. 2. Permit Barang Kawalan Berjadual; Reference Number: KPDKKK.BST.800-1/8/09/13 (SK/D); P Serial Number: (T 00606); Description: Diesel; Storage Capacity: 8190 Litres. License Validity Period: 28/01/2021 – 27/01/2022. 3. Air Compressor License (Air Receiver); Registration Number: TG PM 5172; License Expiry Date: 21/06/2022. <p><u>Pinang Emas Estate</u></p>	
--	--	--	--

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

		<ol style="list-style-type: none"> 1. MPOB License (FFB); License Number: 502606002000; Estate Area: 3870.18 Ha; License Validity Period: 01/03/2021 – 28/02/2022. 2. Permit Barang Kawalan Berjadual; Reference Number: TR/DGN/11/08 SKD; P Serial Number: (T 000127); Description: Diesel; Storage Capacity: 10,000 Litres. License Validity Period: 07/10/2021 – 06/10/2024. 3. Air Compressor License (Air Receiver); Registration Number: TG PMT 4819; License Expiry Date: 23/11/2021. 	
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>TDM Plantation has established a SOP; Procedure for Legal and other Requirements dated 01/01/2021; Edition: TDM/ESTATE/01; Revision; Estate – 00/2021. A Legal Identification & Interpretation Training was conducted by QES Consultant Plt on 15/09/2021 for all personals of TDM to ensure compliance towards all applicable legal requirements.</p> <p><u>Sungai Tong Estate</u></p> <p>The mill management has appointed Ms. Norwati Binti Mamat as the PIC for Compliance – Legal Requirement as stated in the appointment letter (Reference Number: TDMP/LRR/001/2021) dated 23/02/2021.</p> <p><u>Jaya Estate</u></p> <p>The estate management has appointed Mr. Shaharudin Bin Ramli as the PIC for Compliance – Legal Requirement as stated in the appointment letter dated 23/02/2021.</p> <p><u>Pinang Emas Estate</u></p> <p>The estate management has appointed Mr. Eduan Safri Bin Fabir as the PIC for Compliance – Legal Requirement as stated in the appointment letter dated 23/02/2021</p>	Complied

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

		<p>All applicable legal requirement was documented in TDMP 2021 Legal Register, latest updated on Sept 2021. Sighted the email 'TDMP Master LRR For Estates 2021' available at the estates undersigned by the Sustainability Safety and Health Officer and STPOM Legal Register 2021. The document lists the latest applicable laws and amendment, revision dates and acknowledgement by the management. Sighted latest inclusion as follows:</p> <ul style="list-style-type: none"> - Workers Minimum Standards of Housing and Amenities (Amendment) Act 2019 - Perintah Pencegahan dan Pengawalan Penyakit Berjangkit Peraturan-peraturan Pencegahan dan Pengawalan Penyakit Berjangkit (Langkah-langkah di dalam Kawasan tempatan) (No. 7) 2020. - Occupational Safety and Health (Noise Exposure) Regulations 2019. - Pesticides (Amendment of First Schedule) 2019 - Minimum Wages Order, amended 2020 	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Both the estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at both the estates, during the field inspection confirmed that they were clearly marked and maintained.</p> <p><u>Sungai Tong POM</u> – The mill is located in Fikri Estate which is one of the supply base under the Sungai Tong Certification Unit. The land title held by Fikri Estate was available for verification. (Land title Number: 6521; Lot Number: Lot 7663). The Mill compound boundary is clearly demarcated by fences which was visible during the site visit.</p>	Complied

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

		<p><u>Jaya Estate</u> – Visited Block PM00C adjacent to Kampung Jelapang at coordinates 005° 25'02" N, 102°53'10" E, the boundary was marked by security trenches and boundary markers were available (Pole painted with red and white stripes).</p> <p><u>Pinang Emas Estate</u> – Visited Block PR17A1 and the Government Road, the boundary was marked with boundary markers and separated by untouched bushes to clearly indicate the legal boundaries.</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 -	List of contracted parties were made available for verification at visited OU and incorporated in FY2021 stakeholder list.	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 -	<p>Sampled contract @ "<i>perjanjian pesanan kerja/PPK</i>" between Jaya Estate and Nik Ahmad Kamil Bin Nik Ibrahim dated 1/9/21. Mentioned in the Local Order Agreement No 33/21, the contractor agreed to legal requirements compliance, MSPO, RSPO.</p> <p>Other samples of PPK were sighted at Pinang Emas Estate as per below:</p> <ol style="list-style-type: none"> Contractor – Rangkaian Mahir Enterprise, ref. no.: IP 52/20 dated 17/12/2020 Contractor – SF Suria Enterprise, ref. no. 050/21 dated 1/8/21. <p>Evidence of legal due diligence of all contracted third parties was not effectively demonstrated. Evidence sighted as the following: <u>Contract of service @ employment contract</u></p> <ol style="list-style-type: none"> SF Suria Enterprise - Contract of service dated 1/1/21 was not comprehensively include pertinent clauses as required under Employment Act 1955. Rest day, annual leave and medical leave entitlement were not included in the contract. Rate of pay 	Non-compliance

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

		<p>on rest day and public holiday were also not clearly explained in the said contract.</p> <p>2. Abdullah Bin Musa - Contract of service dated 1/1/21 was not comprehensively include pertinent clauses as required under Employment Act 1955. Rest day, annual leave and medical leave entitlement were not included in the contract. Rate of pay on rest day and public holiday were also not clearly explained in the said contract.</p> <p><u>Lawful deduction</u></p> <p>1. SF Suria Enterprise - Based on latest pay slip for worker ID 69\$%11- &1- @!47 September 2021, no lawful deduction made for EPF,SOCSSO/EIS recorded.</p> <p>Thus, a minor non-compliance was issued.</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>Under para 4 of the signed contract @ "<i>perjanjian pesanan kerja/PPK</i>" stated the commitment not to employ children or young person, force labour or trafficked labour. This was explicitly available in all contract @ "<i>perjanjian pesanan kerja/PPK</i>" sampled as reported under 2.2.2.</p>	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>The mill receives RSPO Certified FFB from its own certification unit estates (Fikri Estate, Jaya Estate, Pelong Estate, Tayor Estate, Jerangau Estate and Pinang Emas Estate) and Diverted from other TDM Certified Certification Units such as Gajah Mati Estate, Maidom Estate, Pelantoh Estate, Tebak Estate and Jernih Estate. All the estates are RSPO Certified and the RSPO Certificates are available for verification.</p> <p>The mill also receives Non-RSPO Certified FFB from TDM's uncertified estate, Bukit Bidong and 3rd Party Supply Base such as</p>	Complied

		Pusat Timbang Community (PTK), Cahaya Ikhtiar Sdn Bhd., Ladang Rakyat Terengganu, Pertubuhan Peladang (Maras), Tan Sin How, Santong Sawit among others. For the Collection Centres the mill has obtained the GPS Coordinates and MPOB License of the suppliers. While for the 3 rd Party Estates, the mil has obtained the MPOB Licenses, Evidence of Land Legality and GPS Coordinates.													
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1. - Minor compliance -	The mill is in the midst of compiling the information from all indirectly sourced FFB suppliers.	Complied												
Principle 3: Optimise productivity, efficiency, positive impacts and resilience															
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.															
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	Both the estates, Jaya Estate and Pinang Emas continued to commit to long term economic and financial viability. The annual budgets for 2022 to 2026 were sighted. The budget covers activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance etc. The budget also included projections on yield/ha, and total cost of production per m ton & per ha and CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses	Complied												
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	The long-range replanting programs (LRRP) until 2025 were sighted on all the estates. The program is reviewed annually and incorporated into their annual financial budget. The program sighted for the next 5 years in hectares was as follows: <table border="1" data-bbox="1137 1281 1928 1377"> <thead> <tr> <th>Year</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Jaya Est</td> <td>119.11</td> <td>210.37</td> <td>157.30</td> <td>0</td> <td>508.46</td> </tr> </tbody> </table>	Year	2022	2023	2024	2025	2026	Jaya Est	119.11	210.37	157.30	0	508.46	Complied
Year	2022	2023	2024	2025	2026										
Jaya Est	119.11	210.37	157.30	0	508.46										

		Pinang Emas Est	320.72	336.57	284.41	269.51	311.43												
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	<p>The management review was held on a Group basis chaired by the Plantation CEO incorporating all estates and mill in the region. The agenda discussed among others includes the following;</p> <ul style="list-style-type: none"> a. Results of internal audits b. Customer feedback c. Process performance and product conformity d. Status of preventive & corrective actions e. Follow up action from management review f. Changes that could affect the management system g. Recommendation for improvement h. Human Resources <p>Minutes of meeting for all units were sighted and verified. Verified as per below: -</p> <table border="1"> <thead> <tr> <th>No</th> <th>Operating Unit</th> <th>Date Meeting</th> <th>Attendee</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Pinang Emas Estate</td> <td>18/10/2021</td> <td>32</td> </tr> <tr> <td>2.</td> <td>Jaya Estate</td> <td>09/09/2021</td> <td>18</td> </tr> </tbody> </table>					No	Operating Unit	Date Meeting	Attendee	1.	Pinang Emas Estate	18/10/2021	32	2.	Jaya Estate	09/09/2021	18	Complied
No	Operating Unit	Date Meeting	Attendee																
1.	Pinang Emas Estate	18/10/2021	32																
2.	Jaya Estate	09/09/2021	18																
<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	(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.	The estates and the mill had stated their intentions towards continuous improvement through the following action. The plans were similar and monitored through the regional compilation.					Complied												

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

	- Critical (Major) compliance -		
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. 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>	The RSPO metric template for Sg Tong POM and Supply base was using version 2.1. The data verification such as workers record, training record was accurate as per record in each operating units.	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>The mill operations was guided by the TDM Plantations Sdn Bhd (STPOM); Standard Operating Procedures which was available for verification. Among the SOPs sampled were;</p> <ul style="list-style-type: none"> a. Legal and Other Requirements; Revision: STPOM – 00/2021 b. Medium Term Supply and Delivery Procedure c. Working At Height d. Emergency Preparedness & Response e. Environment Aspect/ Impacts Evaluation f. Working in Confined Space g. Reporting of CSPO and CSPK to RSPO PalmTrace. <p><u>Supply Base Estates</u> TDM Plantations have established a Standard Operating procedure for all operations in the estate which was revised on March 2020.</p>	Complied

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

		(Revision 3). The TDMP SOP 2020 was available for verification which includes topics such as Boundary marking, Muster Call, Oil Palm Nursery, Replanting OP to OP, Drainage, Soil Conversion, Supplying, Palm Census, Manuring, Bunch Census and Schedule Waste among others.	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	<p>The mechanism for checking the implementation procedure as following:</p> <p>a. <u>Sustainability Audit</u></p> <ul style="list-style-type: none"> - Sungai Tong POM: 10/10/2021 - Jaya Estate: 05/09/2021 - Pinang Emas Estate: 06/10/2021 <p>b. <u>Plantation Advisor Visit</u></p> <ul style="list-style-type: none"> - Pinang Emas Estate: 22 – 23/09/2018 <p>Follow up the action from management review all PIC has been designated to close the NC. The internal audit is planned to be conducted once a year. This was sighted from the internal audit program by the sustainability personnel. Internal audit is planned and conducted regularly to determine the strong and weak points and potential areas for further improvement.</p> <p>The internal audit procedures and audit results are documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action as stated in the closure column.</p>	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	As mentioned, all estates' management has conducted a management review meeting in the estate to discuss the issues that have been raised during the internal audit for RSPO and agronomist visit. Actions taken from RSPO internal audit have been taken and recorded in the report. Action that needs to be taken	Complied

		<p>has been recorded and the status of the issue also has been maintained.</p> <p>The Palm Oil Mill management is monitoring all the records about the operations which can be found through the Workplace Inspection Checklist, OSH Department Safety Audit Report as well as Internal Audit conducted by the sustainability department.</p>									
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>											
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There are no new plantings or new operations within the Sg Tong POM certification unit. Nevertheless, the management unit has carried out a baseline Social Impact Assessment in 2012. The assessment was done by external consultant under SRA consultancy from 18/03/21 to 19/04/21. The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into a management plan.. The report includes both positive and negative impact and its recommendation.</p>	Complied								
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Social management plan has been reviewed for all operating units on annual basis. SIA management plan sighted as the following:</p> <table border="1"> <thead> <tr> <th>Estate/Mill</th> <th>Date of review</th> </tr> </thead> <tbody> <tr> <td>Sg Tong POM</td> <td>20/10/2021</td> </tr> <tr> <td>Jaya Estate</td> <td>14/10/2021</td> </tr> <tr> <td>Pinang Mas Estate</td> <td>1/10/2021</td> </tr> </tbody> </table>	Estate/Mill	Date of review	Sg Tong POM	20/10/2021	Jaya Estate	14/10/2021	Pinang Mas Estate	1/10/2021	Non-compliance
Estate/Mill	Date of review										
Sg Tong POM	20/10/2021										
Jaya Estate	14/10/2021										
Pinang Mas Estate	1/10/2021										

		<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 survey form to the stakeholders. This survey period is from 05-19/10/2021. Summary of issues raised will be incorporated in the SIA management plan for further monitoring.</p> <p>Social management and monitoring plan were not comprehensively developed with participation of affected stakeholders. This is based on SIA management plan dated 01/10/2021, where the specific issues with regards to contractor management and due diligence were not identified in the management plan. Non-compliance issues related to lawful deduction (SOCISO and EPF) and contract of service was observed and recorded. Further interview with the contractor, SF Suria Enterprise has confirmed on the lawful deduction and contract of service issues which not in lined with Employment Act 1955. Thus, a minor NC raised.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>The social 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, gender committee meeting were included. Review and monitoring plan updating reported as per indicator 3.4.2.</p>	Complied
<p>Criterion 3.5: A system for managing human resources is in place.</p>			

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>TDM Plantation Sdn Bhd has an SOP for recruitment of mill and estates. SOP named "<i>Pengurusan Tenaga Kerja Tamu</i>" , TDMP/SOP-OD/01 dated 1st March 2019. SOP for local workers (mill and estates) documented under "Prosedur Perlantikan Pekerja Ladang and Kilang", TDMP/SMP/3/01.01 dated 2nd November 2016.</p> <p>The SOP specifies that recruitment, selection and hiring process involves vetting and interviews, and must be medically fit. Promotions are at the sole discretion of the Company. Retirement age is fixed at 60 for local and termination of employment can be given mutually subject to the terms of the employment contract and Employment Act 1955.</p> <p>For foreign workers, or guest workers, the SOP for recruitment, hiring involves interview, selection based on age, qualification, and agricultural experience. Retirement and termination are as per Employment Act 1955 and employment contracts.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Based on the personal files sighted for local and foreign workers, the employment procedures are being implemented and all records such as job application forms, medical records and employment contract.</p>	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>All operations were risk assessed to identify all Health and Safety issues. Mitigation plans, and procedures were available, documented and implemented as below.</p> <p><u>Sungai Tong POM</u></p> <ul style="list-style-type: none"> - The mill assessed all risks, hazards and identified Health and Safety issues through the implementation of HIRARC. HIRARC was available for sampled operations such as Weighbridge, 	Non-compliance

		<p>Ramp, Threshing Station, Pressing Station and Clarification Station.</p> <ul style="list-style-type: none"> - Chemical Health Risk Assessment (CHRA) was conducted on 05/08/2019 by DOSH Registered Assessor (HQ/08/ASS/00/259). The CHRA Report (HQ/08/ASS/00/259-2019/005) was available for verification. Medical Surveillance was conducted on 15/09/2021 in compliance with the recommendation of the CHRA for workers exposed to fumes and organophosphate in the mill. The results indicated that all workers were fit to work. - Noise Risk Assessment Report was available in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019. The monitoring was done on 16/03/2020 by Noise Risk Assessor (HQ/06/PEB/00/97) – SI Energy Sdn Bhd. - Audiometric Test was conducted for workers identified to be exposed to excessive noise in the mill by SI Energy Sdn Bhd. A total of 101 personnel attended the test on 12/04/2021. 8 of them attended for baseline audiometric and 93 of them attended for annual audiogram test. A total of 20 workers were instructed to be sent for repeat of audiogram test in 3 months. The audiogram repeat test was conducted on 04 – 10/10/2021 and the results are pending. <p><u>Jaya Estate</u></p> <ul style="list-style-type: none"> - The estate assessed all risks, hazards and identified Health and Safety issues through the implementation of HIRARC. HIRARC was available for sampled operations such as Weeding, Harvesting and Maintenance. - Chemical Health Risk Assessment was conducted in the estate by Medi-Ihsan Occupational Safety and Health Sdn Bhd on 	
--	--	--	--

		<p>19/08/2019 – 17/09/2019. The CHRA Report (Report Number: HQ/12/ASS/00/306 – 2019/0021)</p> <ul style="list-style-type: none"> - Noise Risk Assessment Report was available in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019. The monitoring was done on 20/10/2020 by Noise Risk Assessor (HQ/06/PEB/00/69) – EHS Quantum Venture. - Baseline Audiometric Test was conducted at Klinik Ihsan on 8th to 16th August 2021 for 7 workers deemed to be exposed to excessive noise in the estate, namely tractor drivers and mist blower applicators. The results indicated the 3 of them were found to have normal audiometric results and 4 of them were noted to have Mild High Frequency Hearing Loss. The 4 identified workers were then examined by OHD at Klinik Ihsan on 26/08/2021 and reported to DOSH via JKPP 7 which was available for verification. <p><u>Pinang Emas Estate</u></p> <ul style="list-style-type: none"> - The estate assessed risks, hazards and identified Health and Safety issues through the implementation of HIRARC. HIRARC was available for sampled operations such as Weeding, Harvesting and Maintenance. <p>HIRARC for Tractor, Kubota and Hooklift Tractor have been identified. Nevertheless, the Hazard identification for the mentioned machinery works was not comprehensively identified as it did not state the hazards related to excessive noise during the operation. Therefore, a non-conformity was raised.</p> <ul style="list-style-type: none"> - Chemical Health Risk Assessment was conducted in the estate by Occumed Consultancy & Services Sdn Bhd on 18/06/2019. 	
--	--	---	--

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

		<p>The CHRA Report (Report Number: JKPP HQ/10/ASS/00/8 2019 /145)</p> <ul style="list-style-type: none"> - Noise Risk Assessment Report was available in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019. The monitoring was done on 12/09/2020 by Noise Risk Assessor (HQ/06/PEB/00/69) – EHS Quantum Venture. Report Reference Number: R-NE-20-TDM LPE-12. - Baseline Audiometric Test was conducted by Si Energy Sdn Bhd (1202037P) on 19th October 2020 for 28 workers deemed to be exposed to excessive noise in the estate. The results indicated the 12 of them were found to have hearing impairment and 10 of them were noted to have Hearing Loss. As per Occupational Safety and Health (Noise Exposure) Regulation 2019, those with hearing loss, hearing impairment and permanent standard threshold shift are required to see Occupational Health Doctor for further Medical Examination. As of to date, there were no evidence that the 23 workers were referred to an Occupational Health Doctor for further Medical Examination. Therefore, a non-conformity was raised. 	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The effectiveness of the HIRARC is monitored and ensured through checklist and trainings that were conducted by Sungai Tong POM and its estate in each of the operations. Site visits around the mill and estate indicated the control measures as per HIRARC were followed and ensured by the respective management units</p>	Complied
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable</p>	<p>TDM Plantation Sdn Bhd (Sungai Tong Palm Oil Mill) OSH Plan, Training Matrix & Training Schedule 2021/2022 (Updated on 23rd March 2021) was established to guide the training programmes to be conducted in the Mill and estates.</p>	Complied

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

	<p>aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>Covid-19 training and briefings were sighted at the mill and estates. Interview with the workers and staff indicated that they were aware on the SOP during the current pandemic such as social distancing, regular sanitization and use of PPE (Face Mask).</p>																									
<p>3.7.2</p>	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Records of trainings were maintained by the Mill and all estates as below:</p> <p>Sungai Tong POM</p> <table border="1" data-bbox="1151 624 1926 1102"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>PPE Training</td> <td>24/10/2021</td> </tr> <tr> <td>Covid-19 Test Training</td> <td>24/08/2021</td> </tr> <tr> <td>Fire Drill Training</td> <td>24/08/2021</td> </tr> <tr> <td>Legal Requirements Register Training</td> <td>16/09/2021</td> </tr> <tr> <td>Biogas Project Safety Training</td> <td>21/06/2021</td> </tr> <tr> <td>Ergonomic and Chemical Handling Training</td> <td>05/05/2021</td> </tr> <tr> <td>Lab Operations Training</td> <td>04/05/2021</td> </tr> <tr> <td>Work at Height Training</td> <td>13/01/2021</td> </tr> </tbody> </table> <p>Jaya Estate</p> <table border="1" data-bbox="1151 1193 1926 1367"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Legal Requirement Register (LRR) & LRR TDMP Revision Session</td> <td>16/09/2021</td> </tr> <tr> <td>RSPO P&C Training</td> <td>28/04/2021</td> </tr> </tbody> </table>	Training	Date	PPE Training	24/10/2021	Covid-19 Test Training	24/08/2021	Fire Drill Training	24/08/2021	Legal Requirements Register Training	16/09/2021	Biogas Project Safety Training	21/06/2021	Ergonomic and Chemical Handling Training	05/05/2021	Lab Operations Training	04/05/2021	Work at Height Training	13/01/2021	Training	Date	Legal Requirement Register (LRR) & LRR TDMP Revision Session	16/09/2021	RSPO P&C Training	28/04/2021	<p>Complied</p>
Training	Date																										
PPE Training	24/10/2021																										
Covid-19 Test Training	24/08/2021																										
Fire Drill Training	24/08/2021																										
Legal Requirements Register Training	16/09/2021																										
Biogas Project Safety Training	21/06/2021																										
Ergonomic and Chemical Handling Training	05/05/2021																										
Lab Operations Training	04/05/2021																										
Work at Height Training	13/01/2021																										
Training	Date																										
Legal Requirement Register (LRR) & LRR TDMP Revision Session	16/09/2021																										
RSPO P&C Training	28/04/2021																										

		<table border="1"> <tr> <td>Swab Test Method for Frontliners Training</td> <td>05/09/2021</td> </tr> <tr> <td>PPE Training</td> <td>26/08/2021</td> </tr> <tr> <td>Chemical Handling (Chemical Preparation, Triple Rinsing and Chemical Storage) Training.</td> <td>26/08/2021</td> </tr> <tr> <td>Inorganic Fertilizer Manuring Training</td> <td>18/05/2021</td> </tr> <tr> <td>First Aid Training</td> <td>11/05/2021</td> </tr> <tr> <td>Mist blower Training</td> <td>03/05/2021</td> </tr> <tr> <td colspan="2"><u>Pinang Emas Estate</u></td> </tr> <tr> <td>Training</td> <td>Date</td> </tr> <tr> <td>Ramp Attendant SOP Training</td> <td>14/09/2021</td> </tr> <tr> <td>Replanting – Safety Training</td> <td>04/10/2021</td> </tr> <tr> <td>Swab Test RTK-Antigen (Saliva) Training</td> <td>29/08/2021</td> </tr> <tr> <td>Harvesting SOP & Safety Training</td> <td>24/08/2021</td> </tr> <tr> <td>Tractor Driver Safety Training</td> <td>29/03/2021</td> </tr> <tr> <td>Working at Height SOP Training</td> <td>28/12/2020</td> </tr> <tr> <td>Manuring & PPE Training</td> <td>15/09/2020</td> </tr> </table>	Swab Test Method for Frontliners Training	05/09/2021	PPE Training	26/08/2021	Chemical Handling (Chemical Preparation, Triple Rinsing and Chemical Storage) Training.	26/08/2021	Inorganic Fertilizer Manuring Training	18/05/2021	First Aid Training	11/05/2021	Mist blower Training	03/05/2021	<u>Pinang Emas Estate</u>		Training	Date	Ramp Attendant SOP Training	14/09/2021	Replanting – Safety Training	04/10/2021	Swab Test RTK-Antigen (Saliva) Training	29/08/2021	Harvesting SOP & Safety Training	24/08/2021	Tractor Driver Safety Training	29/03/2021	Working at Height SOP Training	28/12/2020	Manuring & PPE Training	15/09/2020	
Swab Test Method for Frontliners Training	05/09/2021																																
PPE Training	26/08/2021																																
Chemical Handling (Chemical Preparation, Triple Rinsing and Chemical Storage) Training.	26/08/2021																																
Inorganic Fertilizer Manuring Training	18/05/2021																																
First Aid Training	11/05/2021																																
Mist blower Training	03/05/2021																																
<u>Pinang Emas Estate</u>																																	
Training	Date																																
Ramp Attendant SOP Training	14/09/2021																																
Replanting – Safety Training	04/10/2021																																
Swab Test RTK-Antigen (Saliva) Training	29/08/2021																																
Harvesting SOP & Safety Training	24/08/2021																																
Tractor Driver Safety Training	29/03/2021																																
Working at Height SOP Training	28/12/2020																																
Manuring & PPE Training	15/09/2020																																
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>Training for PICs involved in the SCCS were available in the Supply Chain & Traceability Training conducted on 25/08/2021, attended by Assistant Manager, Chief Clerk, Lab Assistant, Staffs, Safety Officers and Despatch Clerk.</p>	Complied																														

Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C) . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	Sg Tong POM is under mass balance module. Thus, this indicator is not applicable.	Not Applicable
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Sg Tong POM received and processed both RSPO certified and uncertified FFB from plantations/estates, outgrowers and FFB Traders and claim only the volume of oil palm products produced from processing of the certified FFB as MB-Certified.	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. Review period from September 2010 to August 2021 is referred to.	Complied

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

3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows: <ul style="list-style-type: none"> - Members ID: RSPO_PO1000001113 - Member category : Oil Mill Details of transaction can be found under Table 11A of the report	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 to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill. 	<p>Documented Procedures were available for verification and the requirements have been adhered to as below:</p> <ul style="list-style-type: none"> - TDM Plantation Sdn. Bhd. have established Standard Operating Procedure for RSPO Supply Chain (Identity Preserved and Mass Balance Module). Refer Document Edition: TDM/TRCBLT/04; Revision: SCCS – 01/2020; Document Date: 01/12/2020. - Complete and up to date records and reports in relation to RSPO SCCS were maintained and available for verification. Among the records available were Mass Balance Sheet, Internal Audit Reports, and SCCS Training records among others. - TDM Plantation Sdn Bhd have identified and appointed the Mill Manager as the PIC for RSPO Supply Chain Certification Standard requirements as stated in the appointment letter dated 07/07/2019, undersigned by Pengurus Pentadbiran Perladangan TDM Plantations Sdn Bhd. (Doc Reference Number: TDMP/OD/SUST/SCCS). - Procedures for receiving and processing certified and non-certified FFBS has been detailed out in the Standard Operating Procedure for RSPO Supply Chain (Identity Preserved and Mass Balance Module). Refer Document Edition: 	Complied

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

		TDM/TRCBLT/04; Revision: SCCS – 01/2020; Document Date: 01/12/2020.	
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>TDM Plantation Sdn. Bhd. have established Standard Operating Procedure for RSPO Supply Chain (Identity Preserved and Mass Balance Module). Refer Document Edition: TDM/TRCBLT/04; Revision: SCCS – 01/2020; Document Date: 01/12/2020. The procedure covers the Internal Audit procedures and requirements.</p> <p><u>Supply Chain & Traceability Internal Audit</u></p> <p>RSPO Supply Chain & Traceability Audit was conducted on 3rd August 2021 at Sungai Tong POM. The Internal Audit Report was available for verification. The Internal Audit raised 3 Major Non-conformity regarding the RSPO Supply Chain.</p> <p>A Corrective Action Report on Non-Compliance Findings were established on 17/08/2021, addressing the findings raised during the Internal Audit.</p> <p>The mill have rectified the error and closed the non-conformity. Sampled the weighbridge tickets and identified the correct RSPO Number is currently used.</p> <p><u>Management Review</u></p> <p>Management Review was conducted during the Marketing & Operation Meeting on 12/09/2021 to address and discuss all the issues raised during the RSPO Supply Chain & Traceability 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>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>	<p>Sungai Tong POM maintain the daily records of all certified and uncertified FFB received and documented in daily processing records. The records include the FFB suppliers, weight, and vehicle transportation details. The mill has maintained records of FFB received such as Delivery Notes and Weighbridge operator. Sample of FFB delivery records:</p> <p>Incoming FFB</p>	Complied

	<p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p><u>TDM Certified Supply Base (Diverted FFB)</u></p> <ul style="list-style-type: none"> - Company: TDM Plantation Sdn Bhd - Estate: Gajah Mati Estate - Date: 14/07/2021 - Ticket Number: LGM 48360 - Vehicle Number: JLL 8033 - FFB Weight: 31.80 Mt <p><u>Non Certified 3rd Party FFB</u></p> <ul style="list-style-type: none"> - Company: Ladang Rakyat Terengganu Sdn Bhd - Estate: Ladang Rakyat Terengganu Estate - Date: 02/03/2021 - Ticket Number: 35797 - Vehicle Number: WFL 2608 - FFB Weight: 3.415 Mt 	
<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 palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; 	<p>Sungai Tong POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p><u>Palm Kernel (CSPK-MB)</u></p> <ol style="list-style-type: none"> a. Buyer: Hup Lee / TDMP Sdn Bhd b. Seller: TDM Plantation Sdn Bhd c. Shipment Date: 24/06/2021 d. Document Date: 24/06/2021 e. RSPO Certificate Number: RSPO 595564 f. Product: Palm Kernel (CSPK-MB) 	<p>Complied</p>

	<ul style="list-style-type: none"> e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<ul style="list-style-type: none"> g. Quantity: 43.480 Mt h. Delivery Note Number: PK 66/2021 (06) i. Contract Number: PK210602 (435mt) <p><u>Palm Kernel (CSPK-MB)</u></p> <ul style="list-style-type: none"> a. Buyer: Musim Mastika Oils & Fats/ IKHASAS b. Seller: TDM Plantation Sdn Bhd c. Shipment Date: 22/06/2021 d. Document Date: 22/06/2021 e. RSPO Certificate Number: RSPO 595564 f. Product: Palm Oil – CSPO Mass Balance g. Quantity: 41.80 Mt h. Delivery Note Number: PO 210611 i. Contract Number: PK210611 (700 mt) 	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure 	<p>TDM Plantation Sdn. Bhd. has established Standard Operating Procedure for RSPO Supply Chain (Identity Preserved and Mass Balance Module). Refer Document Edition: TDM/TRCBLT/04; Revision: SCCS – 01/2020; Document Date: 01/12/2020 under section 11: Outsourced contractors.</p> <p>Stated in the SOP, CPO mill cannot outsource processing activities like refining or crushing. Outsourcing activities for Sungai Tong POM was for CPO and PK transportation.</p> <p>Sighted the contract agreement between TDM Plantation Sdn. Bhd and contractor;</p> <ul style="list-style-type: none"> - Contract Agreement between TDM Plantation Sdn Bhd and Koperasi Ladang Sungai Tong Terengganu Berhad dated 	Complied

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

	<p>that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>01/01/2019; Contract Renewal; Reference Number TDMP/OD/09/01/32; Dated 28/10/2020.</p> <p>The mill trades CSPO and CSPK with its buyers among refineries and/or oleo-chemical plants. Based on agreements, transporter has no ownership of transported products and owned by buyer. Thus, indicator (b), (c) and (d) are not applicable.</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of transporters used for the physical handling of RSPO certified oil palm products were recorded and registered in the mill supplier database system.	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.	Names and contact details of any new transporter used for the physical handling of RSPO certified oil palm products to be informed by mill supply chain PIC upon available.	Complied
3.8.12	<p>Record keeping</p> <p>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.</p> <p>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.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p>	<p>Accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements available for verification.</p> <ol style="list-style-type: none"> 1. Sg Tong POM has kept the records such as SOP, training, dispatch note as per RSPO SCC Standard February 2020 requirement. Sampled seen as per 5.4.1, 5.6.1. 2. The records are kept for 5 years as per own established SOP, TDM/TRCBLT/04, SCCS-01/2020 dated 01/12/2020. 3. Not applicable. 4. Based on verification of MB accounting which the mill opted for real time basis recording, it was found that the certified CPO was always delivered from positive stock. There was no 	Complied

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

	<p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>short sale recorded within the last review period. Closing stock for October 2021; CPO: 478.76 mt, PK: 531.50 mt</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The oil extraction rate (OER) and the kernel extraction rate (KER) estimate is based on past experience and extraction rate potential (budget) for the next financial year. For the last reporting period, OER and KER reported at 18.70% and 4.15%.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Extraction rate recorded at (OER) 18.70 % and (KER) 4.15 % for the last review period from September 2020 to August 2021.</p>	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Not applicable. Sg Tong POM is under mass balance module.</p>	Complied
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after</p>	<p>Sg Tong POM take legal ownership and physically handle RSPO Certified Sustainable oil palm products (CPO and PK) and registered all transaction in the RSPO IT platform. RSPO ID: RSPO_PO1000001113, license valid until 26/1/22</p>	Complied

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

	<p>dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Declaration time to do shipping announcement is within three-month period after shipment or within the duration agreed by mill's respective customers/buyers as defined in the SOP under clause 8.4.</p> <p>Details of shipping announcement can be found under appendix D of the report.</p>	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims</p>	Complied
General corporate communications			
4.1	<p>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.</p>	<p>No "off-product" claim made made by TDM STPOM in the industry public domain. The corporate communication is managed at TDM Plantations at HQ level.</p>	Not Applicable
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	<p>Not Applicable as corporate communication is managed at TDM Plantations at HQ level.</p>	Not Applicable
4.3	<p>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.</p>	<p>Not Applicable as corporate communication is managed at TDM Plantations at HQ level.</p>	Not Applicable

4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not Applicable as corporate communication is managed at TDM Plantations at HQ level.	Not Applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Not Applicable as corporate communication is managed at TDM Plantations at HQ level.	Not Applicable
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Not Applicable as business to business communication is managed at TDM Plantations at HQ level.	Not Applicable
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Not Applicable as business to business communication is managed at TDM Plantations at HQ level.	Not Applicable
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Not Applicable as business to business communication is managed at TDM Plantations at HQ level.	Not Applicable

Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Not Applicable as the facility does not involve with consumer end product.	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.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Not Applicable as the facility does not involve with consumer end product.	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	Not Applicable as the facility does not involve with consumer end product.	Not Applicable

	<p>of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
<p>MODULE B – MASS BALANCE SPECIFIC RULES</p>			
<p>Minimum Mass Balance content</p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>Oil palm content for CPO and PK is 100% RSPO MB certified. There was no mixture of non-certified oil palm content when MB claim is made.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>STPOM POM only applies MB model and the conventional CPO are downgraded from MB whenever demanded.</p>	<p>Complied</p>
<p>Labelling and trademark (MB)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> Surrounded by the text: 'Certified sustainable palm oil'. The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does 	<p>No RSPO label used as CPO and PK is semi-finished product.</p>	<p>Complied</p>

	<p>not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</p> <ul style="list-style-type: none"> • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p>	<p>No RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 		
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	Sg Tong POM management unit subscribed to Human Rights Policy dated 1 st April 2021 signed by new CEO. This Policy is documented and affirms the Company’s commitment to support the principle of Universal Declaration of Human Rights and ILO Core Convention ON Labour Standards as to identify, evaluate and manage the social impact on human rights.	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	Based on documentation review, observations and stakeholder interviews, there is no evidence that Sg Tong POM certification unit had instigated violence or used any form of harassment in its operations.	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>A Grievance Redressal Procedure has been established by United Plantations Berhad. This procedure is referred to when managing conflicts and grievances raised by the internal (employees) and external stakeholders (statutory bodies, local communities, smallholders and NGOs).</p> <p>TDM Plantation Sdn Bhd has developed a Communication Procedure – <i>Carta Aliran Pendendalian Isu Sosial (Stakeholder) (Aduan / Rungutan / Permohonan) / Social issues Flowchart (stakeholders) (Complaint/Application), rev.2/2017</i>. The information / issue reported shall be rectify according to type of communication. E.g. <i>Prosedur Komunikasi Dengan Pihak Kilang / Ladang, within 28 days & Prosedur Aduan / Rungutan; within 28 working days</i> which</p>	Complied

		include discussion with relevant parties, manager and top management. If further action request is involved Head Office, then the management will submit the request to Head Office for further approval and shall be rectified within 30 working day.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	To ensure understanding of all affected and/or illiterate parties, the information is provided in local language and briefed to workers during muster and stakeholder meeting.	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	During this audit, there is no evidence of any grievance filed by stakeholders. However, in accordance with the grievance procedure reviewed, the complainants are to be informed of the status of the complaints at various stages of the dispute resolution process; e.g. within 14 days of receipt of complaint received by the estate management and to be resolved within 30 days. Outcome of resolution process is available and communicated to relevant stakeholders.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	Conflict resolution mechanism is defined in the flowchart named Communication Procedure – <i>Carta Aliran Pendendalian Isu Sosial (Stakeholder) (Aduan / Rungutan / Permohonan) Social issues Flowchart (stakeholders) (Complaint/Application), rev.2/2017</i> . Mediation included in consultation process for resolution which to allow party to be represented as in this case, union @ NUPW.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Mill and estates' management has made contribution to the local communities and workers. The management has provided recreational facilities such as football field, community hall and mosque to the local communities. Besides, the management has made donation to schools for the events upon request by the stakeholders. Interviewed with the representative from school	Complied

		confirmed that the management has provided assistance (donation) and workforce to help for any repairs and upkeep.																	
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.																			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Land titles are available to demonstrate evidence of land leases. The land titles contain information on lessee, hectarage, terms and conditions of lease period and grant numbers.</p> <p>The following land titles were sampled:</p> <p><u>Jaya Estate</u></p> <table border="1" data-bbox="1137 679 1928 1377"> <thead> <tr> <th>No.</th> <th>Land title details</th> <th>Land use type</th> <th>Tenure</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>District: Setiu, Mukim: Hulu Nerus, grant no. 6001, lot no. 6558 Total hectare: 1,661.4191 ha</td> <td>No specific land use type</td> <td>Lease hold for 99 years (lease period from 1/1/73 – 31/12/2071) Under Perbadanan Memajukan Iktisad Negeri</td> </tr> <tr> <td>2</td> <td>District: Kuala Terengganu, Mukim: Belara, grant no. GRN 6247, lot no. 6743 Total hectare: 84.9093 ha</td> <td>No specific land use type</td> <td>Lease hold for 99 years (lease period from 1/1/73 – 31/12/2072) Under Perbadanan Memajukan Iktisad Negeri</td> </tr> <tr> <td>3</td> <td>District: Setiu, Mukim: Hulu Nerus, grant no. GRN 12885, lot no. 7250 Total hectare: 1,413.0873ha</td> <td>Oil Palm</td> <td>Lease hold for 99 years (lease period from 1/1/73 – 31/12/2072) Under Perbadanan Memajukan Iktisad Negeri</td> </tr> </tbody> </table>	No.	Land title details	Land use type	Tenure	1	District: Setiu, Mukim: Hulu Nerus, grant no. 6001, lot no. 6558 Total hectare: 1,661.4191 ha	No specific land use type	Lease hold for 99 years (lease period from 1/1/73 – 31/12/2071) Under Perbadanan Memajukan Iktisad Negeri	2	District: Kuala Terengganu, Mukim: Belara, grant no. GRN 6247, lot no. 6743 Total hectare: 84.9093 ha	No specific land use type	Lease hold for 99 years (lease period from 1/1/73 – 31/12/2072) Under Perbadanan Memajukan Iktisad Negeri	3	District: Setiu, Mukim: Hulu Nerus, grant no. GRN 12885, lot no. 7250 Total hectare: 1,413.0873ha	Oil Palm	Lease hold for 99 years (lease period from 1/1/73 – 31/12/2072) Under Perbadanan Memajukan Iktisad Negeri	Complied
No.	Land title details	Land use type	Tenure																
1	District: Setiu, Mukim: Hulu Nerus, grant no. 6001, lot no. 6558 Total hectare: 1,661.4191 ha	No specific land use type	Lease hold for 99 years (lease period from 1/1/73 – 31/12/2071) Under Perbadanan Memajukan Iktisad Negeri																
2	District: Kuala Terengganu, Mukim: Belara, grant no. GRN 6247, lot no. 6743 Total hectare: 84.9093 ha	No specific land use type	Lease hold for 99 years (lease period from 1/1/73 – 31/12/2072) Under Perbadanan Memajukan Iktisad Negeri																
3	District: Setiu, Mukim: Hulu Nerus, grant no. GRN 12885, lot no. 7250 Total hectare: 1,413.0873ha	Oil Palm	Lease hold for 99 years (lease period from 1/1/73 – 31/12/2072) Under Perbadanan Memajukan Iktisad Negeri																

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

		<p>Verified agreement between Perbadanan Memajukan Iktisad Negeri Terengganu and Kumpulan Ladang-Ladang Terengganu Sdn Bhd. Total of 3 titles lease with the total of 3,159.4157 ha.</p> <p><u>Pinang Emas Estate</u></p> <table border="1" data-bbox="1137 555 1926 1034"> <thead> <tr> <th>No.</th> <th>Land title details</th> <th>Land use type</th> <th>Tenure</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>District: Dungun, Mukim: Jerangau, HS(D)no. 75, no. PT 1143 Total hectare: 621.5977 ha</td> <td>Agriculture</td> <td>Lease hold for 99 years (lease until 31/1/2075) Under Perbadanan Memajukan Iktisad Negeri</td> </tr> <tr> <td>2</td> <td>District: Dungun, Mukim: Jerangau, grant no. 10735, no. PT 1144 Total hectare: 284.8989 ha</td> <td>Agriculture</td> <td>Lease hold for 60 years (lease until 26/10/2051) under Perbadanan Memajukan Iktisad Negeri</td> </tr> </tbody> </table> <p>Verified agreement between Perbadanan Memajukan Iktisad Negeri Terengganu and Kumpulan Ladang-Ladang Terengganu Sdn Bhd. Total of 4 land titles lease with the total of 3,870.18 ha.</p>	No.	Land title details	Land use type	Tenure	1	District: Dungun, Mukim: Jerangau, HS(D)no. 75, no. PT 1143 Total hectare: 621.5977 ha	Agriculture	Lease hold for 99 years (lease until 31/1/2075) Under Perbadanan Memajukan Iktisad Negeri	2	District: Dungun, Mukim: Jerangau, grant no. 10735, no. PT 1144 Total hectare: 284.8989 ha	Agriculture	Lease hold for 60 years (lease until 26/10/2051) under Perbadanan Memajukan Iktisad Negeri	
No.	Land title details	Land use type	Tenure												
1	District: Dungun, Mukim: Jerangau, HS(D)no. 75, no. PT 1143 Total hectare: 621.5977 ha	Agriculture	Lease hold for 99 years (lease until 31/1/2075) Under Perbadanan Memajukan Iktisad Negeri												
2	District: Dungun, Mukim: Jerangau, grant no. 10735, no. PT 1144 Total hectare: 284.8989 ha	Agriculture	Lease hold for 60 years (lease until 26/10/2051) under Perbadanan Memajukan Iktisad Negeri												
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. Therefore, there was no documents evidence of any negotiated agreements detailing FPIC process.	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 -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	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 -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	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 -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	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 -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Complied

4.4.5	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.</p>	Complied
<p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>Sg Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area. Documented procedure is in place as per "Flowchart and Procedures On Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017; that states the process of resolve the land dispute issues. Objectives of the procedure is to ensure the land dispute is resolved in timely manner. Types of disputes are such as disputes over land boundaries, conflicts with land-owners and land ownerships. Verification process of conflict will be carried out and affected stakeholders need to be informed. Compensation and negotiation process will be carried out as per the mutual agreement of both parties.</p>	Complied
4.5.2	<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</p>	<p>Sg Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.</p>	Not Applicable

	<p>access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>		
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>Sg Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.</p>	<p>Not Applicable</p>
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>Sg Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.</p>	<p>Not Applicable</p>
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>Sg Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.</p>	<p>Not Applicable</p>
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>Sg Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.</p>	<p>Not Applicable</p>

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 -	Sg Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No acquired new lands in the areas inhabited by communities within Sg Tong POM certification unit	Not Applicable
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Documented procedure is in place as per "Flowchart and Procedures On Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017; that states the process of resolve the land dispute issues. Objectives of the procedure is to ensure the land dispute is resolved in timely manner. Types of disputes are such as disputes over land boundaries, conflicts with land-owners and land ownerships. Verification process of conflict will be carried out and affected stakeholders need to be informed. Compensation and negotiation process will be carried out as per the mutual agreement of both parties.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	The process is explained under "Flowchart and Procedures On Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017	Complied

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

4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	No scheme smallholdings within Sg Tong POM certification unit. Equal opportunities are provided to both men and women mentioned in the said procedure if there is any customary right issues occurs in future development and new acquisition.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	At the point of audit, there was no process and outcomes of any negotiated agreements, compensation and payments reported.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	There is a guidance procedure for "Flowchart and Procedures On Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	The process is explained under "Flowchart and Procedures On Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	No customary land authorized by customary landowners through FPIC process within Sg Tong POM certification unit. Thus, this indicator is not applicable	Not Applicable
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			

4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	No customary land authorized by customary landowners through FPIC process within Sg Tong POM certification unit. Thus, this indicator is not applicable	Not Applicable
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	No customary land authorized by customary landowners through FPIC process within Sg Tong POM certification unit. Thus, this indicator is not applicable	Not Applicable
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	No customary land authorized by customary landowners through FPIC process within Sg Tong POM certification unit. Thus, this indicator is not applicable	Not Applicable
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	No customary land authorized by customary landowners through FPIC process within Sg Tong POM certification unit. Thus, this indicator is not applicable	Not Applicable

Principle 5: Support smallholder inclusion

Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.

5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	The pricing of FFB was posted at Weight Bridge for incoming lorries based on daily basis. Seller or smallholders can make an enquiry of the FFB price by making a phone call to POM office.	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 -	Stakeholder Meeting was conducted for the FFB suppliers and documented in the Minutes Meeting Outside Crop Purchasing (OCP) dated 18/08/2021 and 26/07/2021 available for verification. It was noted that the FFB suppliers attended and were briefed on the FFB Pricing.	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Pricing is based on the MPOB Monthly Average Price for CPO and PK and the OER and KER awarded by Sungai Tong POM. This was affirmed by verifying the Self Billed Invoice to the FFB Suppliers.	Complied
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Generally as sampled in contract agreement between Sg. Tong POM with suppliers of FFB found fair, legally transparent and time frame clearly specified such as payment.	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Sungai Tong POM ensures that all agreed payments to its Outsider FFB Suppliers are in a timely manner in accordance to the contract agreement. Sampled payment records as below. - Peladang Pertubuhan Kawasan Maras/Batu Rakit – Debit Note ID: DN21001647; Date: 17/10/2021	Complied

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

		- Ladang Rakyat Terengganu Sdn Bhd; Credit Note ID: CN21002969; Date 16/08/2021.	
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>Weighbridge were calibrated on an annual basis to ensure no discrepancies in the payments provided to the FFB Suppliers.</p> <p><u>Weighbridge 1</u> No.Siri Alat: B8U98848U9; Nombor Pelekat Keselamatan: 2.1KQ 031811; Receipt Number: B1851193; Description: MPK(E) Mettler Toleou 70,000 Kg; Done By: Metrology Corporation Malaysia Sdn Bhd; Date: 20/09/2021</p> <p><u>Weighbridge 2</u> No.Siri Alat: E17618-0275; Nombor Pelekat Keselamatan: 2.1KQ 018446; Receipt Number: B1686344; Description: MPK(E) Cardinal 205 80,000 Kg; Done By: Metrology Corporation Malaysia Sdn Bhd. Date: 28/09/2021.</p>	Complied
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>	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	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>	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Not Applicable
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	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Not Applicable

	supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -		
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	TDM Plantation Sdn Bhd has revised the new Human Rights Policy / <i>Polisi Hak Hak Asasi Manusia</i> and Social Policy/ <i>Polisi Sosial</i> dated 1 st April 2021. These policies stated the management commitment to treat everyone equally without any discrimination and provide equal opportunities regardless of race, nationality, gender and etc.	Complied

		Interviewed with workers confirmed that no discrimination practice by the management.	
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>	Based on review of employment contracts, interviews with various workers and stakeholders, Sg Tong POM certification unit is able to demonstrate that there is no form of discrimination involving workers and local communities. Its guest workers too are not discriminated against and receive the same remuneration rate and access to amenities as local workers. It was also verified that Sg Tong POM certification unit's guest workers do not pay any recruitment fees.	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>	Sg Tong certification unit's Foreign Workers Policy dated 1 st April 2021 assures that recruitment, promotion and remuneration individual qualifications and performance are based on interview with workers. Based on interview of sampled workers and documentation review which included job application forms, interview notes, and medical fitness confirmation, the Sg Tong POM certification unit has demonstrated that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness.	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Based on interviews with workers, Estate Health Assistant and review of documentations, no female workers are employed in manuring or spraying activities.</p> <p>Pregnancy testing are carried out once in 3 months for female workers whose work does not require them to come into contact with chemicals. As confirmed by the Estate Health Assistant, should a field female worker becomes pregnant, she would immediately be offered an alternative lighter work</p>	Complied

6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Gender committee is in place and available at each operating units. Date of latest meetings as per the following:</p> <p>a. Jaya Estate – 14/07/2021</p> <p>b. Sg Tong POM – 12/10/2021</p> <p>There were issues discussed related sexual harassment, domestic violence as well as reproductive rights. No reported case of harassment and violence so far.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>There is no any discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting.</p> <p>Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste</p>	Complied
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Details of applicable labour laws, namely relevant provisions of the Employment Act 1955 and MAPA/NUPW agreement such as wages, rest day, work days, working hours, overtime, annual leave, medical leave are contained in employment contracts signed between the company and each worker.</p> <p>Documentation of pay is contained in payslips which are issued to the workers every month. Each payslip contains details such as name of worker, month of pay, total wages wage for the month, overtime pay, paid public holiday, paid medical leave (if any), price bonus, SGP, overtime, paid annual leave, statutory deductions such as SOCSO (for all workers), EIS and EPF (for Malaysian workers only), and other deductions, if any.</p>	Complied

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

		<p>Both employment contracts and payslips are prepared in languages that they are familiar with, i.e. Bahasa Malaysia explained to the workers by estate management with the presence of a translator/NUPW representative (if necessary)</p> <p>The following employment contracts and payslips for (October 2020 [peak], December 2020 [normal], June 2021 [low]) were sampled and verified during the audit:</p> <p><u>Jaya Estate: (17 workers sample out of 237 workers)</u></p> <p>Workers ID JY1800919, JY1400655, JY1800885, JY1700844, JY1901000, JY1800921, JY1800970, JY2001062, ID card no. 5616, JY0800257, JY1200618, JY1700829, JY1600816, ID card no. 5121, JY1800898, JY1000421, JY1500761)</p> <p><u>Pinang Emas Estate: (16 workers sample out of 170 workers)</u></p> <p>Workers ID PE0801283, PE0801279, PE2001431, PE0800913, PE1901422, PE1901412, PE2001431, PE1801344, PE0800875, PE2101455, PE2101449, PE210142, PE1801353, PE00031, PE0800764, PE0801115)</p> <p><u>Sg Tong POM: (8 workers sample out of 101 workers)</u></p> <p>Workers ID SM0900221, SM00018, SM0900240, SM0900271, SM0900230, SM0900185, SM0900272, SM00037</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p>	<p>Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers and staff at Sg Tong POM and supplying estates. The documents are prepared in Bahasa Malaysia and English according to which language the workers are conversant in.</p> <p>It stipulates terms of conditions of service such as duration, position, wages payable, working hours, rest hours, holiday</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>entitlement, that general and field workers would be paid according to MAPA/NUPW agreement.</p> <p>All the employment contracts sampled were signed by each worker and the Company. Review of the employment contracts show that the terms are in compliance with the provisions of the Employment Act 1955 and the MAPA/NUPW agreement. Interviews conducted with the workers confirmed that they understand the employment contracts, the terms were explained to them prior to signing, and a copy was given to each worker.</p> <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. None of the sampled workers had any family members performing work on their behalf.</p> <p>The following employment contracts and payslips for (October 2020 [peak], December 2020 [normal], June 2021 [low]) were sampled and verified during the audit:</p> <p><u>Jaya Estate: (17 workers sample out of 237 workers)</u></p> <p>Workers ID JY1800919, JY1400655, JY1800885, JY1700844, JY1901000, JY1800921, JY1800970, JY2001062, ID card no. 5616, JY0800257, JY1200618, JY1700829, JY1600816, ID card no. 5121, JY1800898, JY1000421, JY1500761)</p> <p><u>Pinang Emas Estate: (16 workers sample out of 170 workers)</u></p> <p>Workers ID PE0801283, PE0801279, PE2001431, PE0800913, PE1901422, PE1901412, PE2001431, PE1801344, PE0800875, PE2101455, PE2101449, PE210142, PE1801353, PE00031, PE0800764, PE0801115)</p>	
--	--	---	--

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

		<p><u>Sg Tong POM: (8 workers sample out of 101 workers)</u> Workers ID SM0900221, SM00018, SM0900240, SM0900271, SM0900230, SM0900185, SM0900272, SM00037</p> <p>Based on the above sample workers, 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>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Sg Tong POM and estates were able to demonstrated compliance with legal requirements on the following issues:</p> <p><u>Regular working hours:</u> Workers interviewed confirmed that they work 6 days in a week, with Friday being the rest day. Normal working hours is 8 hours per day, and this is also stipulated in the employment contracts.</p> <p><u>Deductions:</u> Labour Department Permit for salary deductions is available in document Bil Ruj: JTK/(T)600.2.2.1 Jld 2(4) dated 30/5/19. Salary deductions are subject to consent from workers. Memorandum of Agreement for Employment where the following workers consented to salary deductions for Tabung Haji, water, electricity was also sighted.</p> <p>For Sg Tong POM, a blanket salary deduction approval was obtained from Labour Department. Refer to letter from Labour Department, ref: PTK/ST/600.2.2(32) dated 23/1/2013.</p> <p><u>Overtime, sickness and holiday entitlement:</u> Based on overtime records, payslips, and interview with workers, evidence was</p>	Complied

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

		<p>available that overtime is paid in accordance with the Employment Act 1955 and MAPA/NUPW 2019 Agreement.</p> <p>For Sg Tong POM, overtime hours approved for maximum of 130 hours based on approval dated 9/8/17, ref: BHG.PU/9/134 JLD 9 (60).</p> <p><u>Maternity leave:</u> female workers are entitled to 2 months' paid maternity leave. This was confirmed during interview with the Secretary of the Gender Committee</p>					
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Sg Tong POM and estates provide good housing with good sanitation, medical facilities, and welfare amenities. Site visits were made to workers' housing. Overall, the houses and surrounding compound are well maintained with clean and flowing drains, no tall grass and household waste properly disposed of.</p> <p>All houses receive free water up to 35 gallon per day and electricity is subsidised for RM 5 per house per month. Each house has 2 rooms and in liveable condition. Among the amenities available include creche, surau, football field, sundry shop, canteen and a clinic. The clinic is managed by a Estate Health Assistant and is equipped with an ambulance. A visiting medical officer visits the clinic once a fortnight as shown on the record. Linesite inspection is conducted on a weekly basis by the Estate Hospital Assistant. Summary of weekly inspection as per the following:</p> <table border="1" data-bbox="1137 1203 1928 1334"> <thead> <tr> <th data-bbox="1137 1203 1335 1254">Estate/mill</th> <th data-bbox="1335 1203 1928 1254">Date of inspection</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 1254 1335 1334">Jaya Estate</td> <td data-bbox="1335 1254 1928 1334">30/10/2021, 23/10/2021, 16/10/2021, 05/10/2021</td> </tr> </tbody> </table>	Estate/mill	Date of inspection	Jaya Estate	30/10/2021, 23/10/2021, 16/10/2021, 05/10/2021	Complied
Estate/mill	Date of inspection						
Jaya Estate	30/10/2021, 23/10/2021, 16/10/2021, 05/10/2021						

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

		Sg Tong POM	25/10/2021, 20/10/2021, 12/10/2021, 04/10/2021	
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>	Sg Tong POM and estates were able to demonstrate workers' access to adequate, sufficient and affordable food. There is a sundry shop and a food canteen near the linesite. The sundry shop sells daily requirements such as vegetables, rice, flour, eggs, sugar, milk, cooking oil, frozen food, beverages, toiletries, etc.		Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation</p>	<p>Prevailing wages and in-kind benefits assessment conducted by Unit of Certification (UoC). As for 2020, a baseline/pilot project for the assessment was carried out at one sample estate (Air Putih Estate).</p> <ul style="list-style-type: none"> - In-kind benefit: RM 957 - Take home salary: RM 1,200 - Total: RM2,157 <p>Progressively, prevailing wages calculation will be extended to each operating units to set a benchmark value for reference.</p>		Complied

	<p>with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Based on documents sighted and interviews conducted with workers and management, Sg Tong POM and estates only employ full-time employees. All employees are employed on either permanent or contractual full-time basis</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</p>	<p>Published statement in local language recognizing freedom of association policy is in place as documented in 'Freedom of Association Policy / <i>Polisi Kebebasan Berpersatuan</i> dated 1st April</p>	Complied

	Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented. - Critical (Major) compliance -	2021. Workers interview confirmed that they are not being restricted to join or form trade union.	
6.3.2	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. - Minor compliance -	For selected estates; there are no union representative available onsite. All union related matter is handled by the NUPW Terengganu Branch Secretary. Documented communication between NUPW branch and estates (Jaya and Pinang Emas Estate) were sighted. Workers interview confirmed that the branch secretary visited them in several occasion to get feedback from workers. Meeting with management was carried at respective estates as per the following: - Pinang Emas Estate – 23 rd September 2021 - Sg Tong POM – 1 st September 2021	Complied
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	As confirmed by the workers during interview, all worker representatives were freely elected among and by the workers themselves. They comprise various nationalities, and were selected based on experience, communication skills and number of years worked	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	TDM Plantation Sdn Bhd has developed Social Policy/ <i>Polisi Sosial</i> and Protection of Children Policy/ <i>Polisi Perlindungan Kanak Kanak dated 1st April 2021</i> ; that states company's commitment for not exploiting, using and recruiting child labour which under 16 years old. Document reviewed, workers interview and stakeholder consultation confirmed that no historical child labour employed in the company. Youngest workers hired by the company is 18 years old.	Complied
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above	There was no evidence that Sg Tong Pom and estates employ anyone below the age of 18 years. This was verified by examining	Complied

	<p>company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>the master lists of each operating unit. A documented age screening verification procedure exists where details of the workers' passport and IC and dates of birth are reviewed and verified before issuance of employment contracts.</p> <p>Copies of identity cards and passports were sampled and verified during the audit. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.</p>	
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Based on documents sighted, interviews and observations, there was no evidence that Sg Tong POM and estates employ any young persons. This was further verified by examining the master lists of each operating unit where details of the workers' IC numbers and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.</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>TDM Plantation Sdn Bhd has developed Social Policy/<i>Polisi Sosial</i> and Protection of Children Policy/<i>Polisi Perlindungan Kanak Kanak</i> dated 1st April 2021; that states company's commitment for not exploiting, using and recruiting child labour which under 16 years old. Document reviewed, workers interview and stakeholder consultation confirmed that no historical child labour employed in the company. Youngest workers hired by the company is 18 years old.</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>Gender Policy was developed and implemented in TDM Plantation Sdn Bhd where the company has the responsibility to take care the rights of workers. Latest policy dated 1st April 2021 endorsed by the new CEO was sighted. They will protect the rights of female workers</p>	Complied

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

		and action will be taken immediately if there is any sexual harassment case reported. Sighted training attendance record during muster ground rollcall for Jerangau Estate (<i>Taklimat Penerangan Polisi Baru</i> / Notification of Briefing of new policy) dated 11 th July 2021.	
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	<i>Polisi Reproduksi</i> / Reproductive Rights Policy and Social Policy is in place, signed by the CEO dated 1 st April 2021. Policy states company commitment not interfering in reproductive planning of the workers and ensuring rights of workers to decide and avoidance in discriminating and harsh treatment to the subjected workers.	Complied
6.5.3	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. - Minor compliance -	Assessment for new mothers' needs was done from 16-20/8/2021 via google form named " <i>Kaji Selidik Ibu Mengandung & Menyusu</i> to female workers in the estate and mill. Recommendation and further action required will be included in the SIA management plan. For example, at Sg Tong POM mother's care room is available for new mothers.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	<i>"Tatacara Aduan Gangguan Seksual"</i> / Complain Process for Sexual Harassment is in place; whereby any cases or suspicious cases is encouraged to be reported within 24 hours, investigated within 2 days and to be reported for action within 5 days. Gender and workers committee interview carried out during the stakeholder consultation as well as individual gender committee chairperson interview confirmed that there is no sexual harassment issues ever reported.	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All workers have entered into employment voluntarily and the following are prohibited:	Based on documentation review and interviews with the workers, Sg Tong POM and estates have demonstrated that workers of various nationalities have entered into employment voluntarily. Consent letters from workers were also sighted.	Complied

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

	<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>Foreign workers too are not charged any recruitment fee. The contract signed between TDM Plantation Sdn Bhd and PT Primadaya Pratama Pandukarya, dated 2nd Februray 2020 also clearly stipulates that recruitment fee would be borne by the company.</p> <p>Workers were aware of the type of job they would be doing at th estate/mill before they left their own countries. All overtime work is done voluntarily, and workers are free to decline an offer for overtime work. Workers are also paid overtime rates in accordance with the Employment Act 1955. Workers are free to resign at any time they wish with no penalty payment. There is also no evidence of any withholding of wages.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Foreign Worker Policy (<i>Polisi Pekerja Asing</i>), signed by the Chief Executive Officer dated 1st April 2021 is in place. The policy states the commitment of the company to ensure recruit of migrant workers shall adhered to the Employment Act 1955, Immigration Act 1959/63 and Compensation Workmen Act 1952 and paid with reasonable wage according to the legal requirement. Based on the selected records, all migrant workers are found hired according to the legal requirement and provided with mandated benefits and minimum wage.</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. 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>All operating units have formed an OSH Committee in the respective mill and estate to address all issues associated to Health and Safety in the operating units. The OSH Organisation Charts were available and displayed at the workstations.</p> <p><u>Jaya Estate</u></p> <ol style="list-style-type: none"> 1. The Estate Manager, Tn. Mohd Rosli Mukhtar has been appointed as the Chairman of the JKKP for Jaya Estate as stated in the appointment letter (Reference Number: 	Complied

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

		<p>TDMP/OD/07/60-10) dated 09/10/2021 undersigned by CEO, TDM Plantation Sdn Bhd. Representatives from the management and workers were also appointment by the manager to form the JKKP Organisation. The JKKP Organisation Chart for 2021 was available for verification.</p> <p>2. Regular meetings were conducted to discuss Health and Safety Issues. Sighted JKKP Meeting Minutes dated 08/08/2021 and 14/06/2021.</p> <p><u>Pinang Emas Estate</u></p> <p>1. The Estate Manager, Tn. Adnan A.Rasik has been appointed as the Chairman of the JKKP for Pinang Emas Estate as stated in the appointment letter (Reference Number: TDMP/OD/07/60-10) dated 09/08/2021 undersigned by CEO, TDM Plantation Sdn Bhd. Representatives from the management and workers were also appointment by the manager to form the JKKP Organisation. The JKKP Organisation Chart for 2021 was available for verification.</p> <p>2. Regular meetings were conducted to discuss Health and Safety Issues. Sighted JKKP Meeting Minutes dated 14/10/2021.</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>The procedures for accident and emergencies have been established and available in the TDM Plantations Sdn Bhd; Standard Operating Procedure; Emergency Preparedness & Response; Date 01/01/2018; Edition: TDM/01; Revision: TDMP-01/2018. There is formation of ERP Team & ERP for all the identified incidences. In addition, the procedures have been summarized in a flowchart form and displayed for information of all employees in the estate and mill. They include emergencies relating fire, chemical spillage, flood and accident at workplace. Sighted during site visit to the mill and estate, all workstations and operations were well equipped with fire extinguishers and first aid kits. Noted during interview with</p>	Complied

		<p>employees and workers shows the understanding regarding emergency procedures.</p> <p>Sungai Tong POM has established Emergency Response Team lead by the Mill Manager. Sighted during site visit, the ERT chart, Fire Hydrant and Fire Extinguisher Map were displayed at several notice boards in the mill.</p> <p>First aiders were present at various workstation at the mill and estates. The first aiders were responsible for first aid box at each workstation/operation. Interview with workers in the mill and estate field operations shows the awareness regarding the emergency procedure if accident occur, person responsible of every first aid box and the location of the nearest first aid box.</p> <p>Trainings on ERP and First Aid were available and verified as below:</p> <p><u>Sungai Tong POM</u></p> <ol style="list-style-type: none"> 1. Emergency Response Training (ERT) Monthly Training – 25/10/2021 2. First Aid Kit Handling Training – 21/10/2021 <p><u>Jaya Estate</u></p> <ol style="list-style-type: none"> 1. Training First Aid Kit – 11/05/2021 2. Fire Drill Training – 08/03/2012 <p><u>Pinang Emas Estate</u></p> <ol style="list-style-type: none"> 1. Fire Fighting Training – 11/08/2020 2. First Aid Training – 28/08/2021 <p>Accident records were available and maintained by the mill and estate on a monthly basis and submitted to the HQ accordingly. JKKP 6, JKK 7 and JKKP 8 forms were available for verification.</p> <p><u>Sungai Tong POM</u></p>	
--	--	---	--

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

		<p>There were no accidents or incidents reported for the year 2021 in the mill. As for 2020 there was 1 accident case reported with a loss of 6 mandays. The JKKP 6 Form was submitted to DOSH accordingly and available for verification. The JKKP 8 Form was submitted to DOSH on 14/01/2020.</p> <p><u>Jaya Estate</u></p> <p>There were 1 accident reported for the year 2021 involving a tractor driver. The accident investigation has been done and JKKP 6 form has been submitted to DOSH and available for verification. A total of 4 workers have been diagnosed with mild hearing impairment based on the Audiometric Test. DOSH have been informed via JKKP7 forms that were available for verification.</p> <p>For the year 2020 there were 3 accident cases with 1 case causing death to the particular worker. The JKKP 6 forms were submitted to DOSH accordingly. The JKKP 8 Form for the year ending 2020 was submitted to DOSH as well on 13/01/2021 and available for verification.</p> <p><u>Pinang Emas Estate</u></p> <p>There were no accidents reported for the year 2021 in the estate as of to date. For the year 2021 there were 2 accident cases reported in the estate. The JKKP 6 form have been submitted to DOSH accordingly and available for verification. The JKKP 8 form for the year ending 2020 has been submitted to DOSH on 21/01/2021 and available for verification.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required PPEs were worn by the personals.</p>	OFI

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

	<p>- Critical (Major) compliance -</p>	<p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p> <p><u>Pinang Emas Estate</u></p> <p>The estate shall further ensure that the estate workers are aware of the availability of wellington boots free of charge for them so that they do not purchase them by themselves. Therefore an OFI was raised.</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>Lost Time Accident (LTA) metrics at Sungai Tong POM and Supply Base estates were recorded accordingly with periodical annual submission made to DOSH on JKPP 8. Details sampled as follows:</p> <table border="1" data-bbox="1137 850 1926 1378"> <thead> <tr> <th>Operating Unit</th> <th>Month</th> <th>Total Workers</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Sungai Tong POM</td> <td>Jul 21</td> <td>102</td> <td>4224.20</td> </tr> <tr> <td>Aug 21</td> <td>102</td> <td>4,345.90</td> </tr> <tr> <td>Sep 21</td> <td>100</td> <td>4,224.20</td> </tr> <tr> <td rowspan="3">Jaya Estate</td> <td>Jul 21</td> <td>126</td> <td>841.20</td> </tr> <tr> <td>Aug 21</td> <td>125</td> <td>867.80</td> </tr> <tr> <td>Sep 21</td> <td>125</td> <td>856.20</td> </tr> <tr> <td rowspan="3">Pinang Emas Estate</td> <td>Jul 21</td> <td>173</td> <td>5406.00</td> </tr> <tr> <td>Aug 21</td> <td>172</td> <td>5598.90</td> </tr> <tr> <td>Sep 21</td> <td>181</td> <td>6208.90</td> </tr> </tbody> </table>	Operating Unit	Month	Total Workers	Amount	Sungai Tong POM	Jul 21	102	4224.20	Aug 21	102	4,345.90	Sep 21	100	4,224.20	Jaya Estate	Jul 21	126	841.20	Aug 21	125	867.80	Sep 21	125	856.20	Pinang Emas Estate	Jul 21	173	5406.00	Aug 21	172	5598.90	Sep 21	181	6208.90	<p>Complied</p>
Operating Unit	Month	Total Workers	Amount																																		
Sungai Tong POM	Jul 21	102	4224.20																																		
	Aug 21	102	4,345.90																																		
	Sep 21	100	4,224.20																																		
Jaya Estate	Jul 21	126	841.20																																		
	Aug 21	125	867.80																																		
	Sep 21	125	856.20																																		
Pinang Emas Estate	Jul 21	173	5406.00																																		
	Aug 21	172	5598.90																																		
	Sep 21	181	6208.90																																		

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

6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>The Operating units recorded all injuries and accidents in the LTA format as below:</p> <table border="1" data-bbox="1137 443 1921 689"> <thead> <tr> <th rowspan="2">Operating Unit</th> <th colspan="2">2020</th> <th colspan="2">2021</th> </tr> <tr> <th>Cases</th> <th>LTA</th> <th>Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Sungai Tong POM</td> <td>1</td> <td>6</td> <td>-</td> <td>-</td> </tr> <tr> <td>Jaya Estate</td> <td>3</td> <td>12,164*</td> <td>1</td> <td>8</td> </tr> <tr> <td>Pinang Emas Estate</td> <td>2</td> <td>71</td> <td>-</td> <td>-</td> </tr> </tbody> </table> <p>*LTA of 2 Death Case Resulting in loss of 12,000 days.</p>	Operating Unit	2020		2021		Cases	LTA	Cases	LTA	Sungai Tong POM	1	6	-	-	Jaya Estate	3	12,164*	1	8	Pinang Emas Estate	2	71	-	-	Complied
Operating Unit	2020			2021																							
	Cases	LTA	Cases	LTA																							
Sungai Tong POM	1	6	-	-																							
Jaya Estate	3	12,164*	1	8																							
Pinang Emas Estate	2	71	-	-																							

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

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

7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	<p>The TDM Estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans.</p> <ol style="list-style-type: none"> The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The plan was guided by SOP ref Agronomic Practices to include the IPM management revised in January 2021. In order to minimize use of insecticides on leaf-eating pest, the estates have planted beneficial plants such as Turnera subulata, Cassia cobanensis, Antigonon leptopus, Euphorbia heterophylla, along the roadsides and designated points in the fields and also within the nursery perimeter. The plan also advocated single layer Bio Compost mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian 	Complied
-------	--	---	----------

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

		<p>pests and diseases had been continued. These monthly detection and observations were carried by staff.</p> <p>d. Census records for Ganoderma affected palms were available for verification.</p> <p>e. All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year where recommended by the PA /Agronomist. Baiting are continued until bait acceptance threshold level</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>Species referenced in the Global Invasive Species Database and CABI.org are not used in the estates.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no evidence of use of fire for pest control in all the estates. TDM has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal as well.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>All pesticides used were those officially registered under the Pesticide Act 1974. The CU confined usage to only class II, class III & class IV pesticides.</p> <p>a. No illegal agrochemicals (stated by local and international laws) such as paraquat are used in the sampled estates.</p> <p>b. The usage of the agrochemicals was based on the Agricultural Reference SOP Section A11 & A12 and in the Pictorial Safety</p>	Complied

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

		<p>Standard Book where written justifications had been provided for various fields operations.</p> <p>c. The Manual has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOP.</p> <p>d. Purchases of pesticides are made on a centralized arrangement via Head Office thus a control by the organization.</p>																															
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides used (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) is maintained by the estate and submitted to the Head Quarters on a monthly basis. Sampled the chemicals a.i/ha used for the month Jan to Sept 2021 as below: -</p> <table border="1" data-bbox="1137 858 1926 1353"> <thead> <tr> <th>Month</th> <th>Jaya Estate</th> <th>Pinang Emas Estate</th> </tr> </thead> <tbody> <tr> <td>Jan 2021</td> <td>0.01</td> <td>0.02</td> </tr> <tr> <td>Feb 2021</td> <td>0.06</td> <td>0.05</td> </tr> <tr> <td>Mar 2021</td> <td>0.01</td> <td>0.05</td> </tr> <tr> <td>Apr 2021</td> <td>0.01</td> <td>0.06</td> </tr> <tr> <td>May 2021</td> <td>0.01</td> <td>0.12</td> </tr> <tr> <td>Jun 2021</td> <td>0.02</td> <td>0.08</td> </tr> <tr> <td>Jul 2021</td> <td>0.09</td> <td>0.08</td> </tr> <tr> <td>Aug 2021</td> <td>0.07</td> <td>0.05</td> </tr> <tr> <td>Sep 2012</td> <td>0.04</td> <td>0.09</td> </tr> </tbody> </table>	Month	Jaya Estate	Pinang Emas Estate	Jan 2021	0.01	0.02	Feb 2021	0.06	0.05	Mar 2021	0.01	0.05	Apr 2021	0.01	0.06	May 2021	0.01	0.12	Jun 2021	0.02	0.08	Jul 2021	0.09	0.08	Aug 2021	0.07	0.05	Sep 2012	0.04	0.09	Complied
Month	Jaya Estate	Pinang Emas Estate																															
Jan 2021	0.01	0.02																															
Feb 2021	0.06	0.05																															
Mar 2021	0.01	0.05																															
Apr 2021	0.01	0.06																															
May 2021	0.01	0.12																															
Jun 2021	0.02	0.08																															
Jul 2021	0.09	0.08																															
Aug 2021	0.07	0.05																															
Sep 2012	0.04	0.09																															

7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p> <p>Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas.</p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There were no evidence of prophylactic use of pesticides in all estates visited.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ol style="list-style-type: none"> Judgment of the threat and verify why this is a major threat Why there is no other alternative which can be used Which process was applied to verify why there is no other less hazardous alternative What is the process to limit the negative impacts of the application Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>Based on the latest chemical register only class II, III & IV chemical used at visited estates. Class 1A chemical Monocrotophos and Methamidophos was eliminated and in its place, Class III chemical Acephate is used for managing bagworm infestation. Paraquat was eliminated and alternatives such as Glyphosate were used instead.</p> <p>Sighted and verified at all the chemical stores for all estates sampled, there was no usage or storage of Paraquat and other Class 1A or 1B pesticides. Interview with the respective management personals and chemical applicators indicated that they were aware that they do not use any chemicals classified as Class 1A or 1B in the estates.</p>	Complied

7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers in the estate.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p> <p><u>Jaya Estate</u></p> <p>a. Chemical Handling (Chemical Preparation, Triple Rinsing and Chemical Storage) Training. – 26/08/2021</p> <p>b. Mist Blower Training – 03/05/2021</p> <p><u>Pinang Emas Estate</u></p> <p>a. Spraying and PPE Training – 05/09/2021</p> <p>b. Spraying SOP Training – 10/03/2021</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p>	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>Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through licensed scheduled waste contractor.</p>	Complied

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

		<p>Sighted the empty container disposal records at the estates visited as follows:</p> <p><u>Pinang Emas Estate</u></p> <p>SW409 Used Empty Container; Consignment Note Number: 20210830157EGPR0; Disposal Date: 30/08/2012; Quantity: 0.2800 Mt; Disposal Facility: Pentas Flora (Kelantan) Sdn Bhd.</p>	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Aerial application of agrochemicals is not practiced in TDM Estates.</p>	Not Applicable
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 was conducted for workers in both sampled estates that's have been identified to be exposed to hazardous chemicals as recommended in the CHRA.</p> <p><u>Jaya Estate</u></p> <p>The medical surveillance was conducted for 17 workers identified to be exposed to hazardous chemicals in the estate. The medical surveillance was conducted on 17/12/2020 with all workers deemed to be fit for work.</p> <p><u>Pinang Emas Estate</u></p> <p>Medical Surveillance was conducted for 16 workers identified to be exposed to hazardous chemicals and fumes in the estate. The medical surveillance was done at Klinik Bestari Sdn Bhd by DOSH Registered Doctor. The results indicated that all 16 workers were fit to work.</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>The Reproductive Policy has been established dated 01/04/2021 undesignated by the CEO, TDM Plantations Sdn Bhd. The policy states <i>"Ibu Baru/Menyusu; Pengecualian tugas melibatkan penggunaan atau penyemburan bahan kimia kepada ibu yang menyusu sehingga bayi berusia 9 bulan"</i></p> <p>Sungai Tong POM and Supply Base Estates complied with policy protecting woman who are pregnant and breastfeeding and persons under the age of 18 from being involved in chemical handling operations.</p> <ol style="list-style-type: none"> a. Women who are identified to be pregnant or breastfeeding are not allowed to be involved in chemical handling works for 2 years. b. The estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. c. Field interviews with the female workers indicated that they are aware that all female workers who are pregnant or breastfeeding are prohibited from being involved in chemical handling works. d. Signages was sighted at chemical stores that stated the prohibition of female workers who are pregnant or breast feeding from entering the premises. e. The mill and estate do not employ anyone below the age of 18 years. f. Reproductive Policy Trainings were conducted and records available for verification for Pinang Emas Estate (19/07/2021) 	Complied
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			

<p>7.3.1</p>	<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>Jaya Estate’s Waste Management Action Plan 2021 consist of type of waste, description of the waste, location of its source, action to be taken, Designated responsibility and status. Among the wastes were scheduled waste such as used lubricant from workshop, empty pesticides containers from main divisional store, used batteries from workshop, domestic waste from linesite, workshop, store. For scheduled waste generated by Jaya estate was SW 305, 410, 404 and 409.</p> <ol style="list-style-type: none"> 1. In Pinang Emas Estate a Waste Management Action Plan 2021 dated Jan 2021 was available in the estate. The scheduled waste generated by Pinang Emas estate was SW 305, 410, 404 and 409. The latest disposal as per below detail:- <ol style="list-style-type: none"> a. SW 404 - Consignment note serial no. 214733 (20210919110DIBZO) dated 19/9/2021. Contractor was Edgenta Mediserve Sdn Bhd b. SW 305 – Consignment note 2021083015VUPE0M dated 30/8/2021. Disposed at Pentas Flora (Kelantan) Sdn Bhd. c. SW 409 – Consignment note 20210830157EGPR0 dated 30/8/2021. Disposed at Pentas Flora (Kelantan) Sdn Bhd. 2. In Sg. Tong POM, available documented Waste Management Action Plan FY 2021/2022 reviewed on 21/01/21. Covering scheduled waste, domestic waste, industrial waste. 	<p>Complied</p>
<p>7.3.2</p>	<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>Domestic waste as sampled in Landfill at Jaya estate in Block 2005A. Latest “Date Open” was on 30/11/2021 and previously “Date Closed” was on 26/10/2021. Scheduled waste was disposed as C/N No 2021102714ZEM42Y submitted 27/10/2021 from Ladang Jaya. Disposed SW409 (empty container) to Pentas Flora (Kelantan) Sdn. Bhd. Driver ’s name Muhammad Alfieza Bin Sazali using lorry No. VAG 9398. C/N No. 20211027147NQiYS submitted on 27/10/2021 from Ladang Jaya to Pentas Flora for SW409 (Used Containers).</p>	<p>Non-compliance</p>

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

		<p>Lorry D no VAG 9398 and Driver nama Muhammad Alfieza Bin Sazali.</p> <p>In Sg. Tong POM available a collection centre for waste under Majlis Daerah Hulu Terengganu (MDHT). Scheduled waste under SW 305 (Spent lubricating oil) was disposed on 23/09/20 to Pentas Flora, Kelantan for 0.6000 MT. SW410 (Contaminated rags, gloves) was disposed by Pentas Flora on 23/09/20 for 0.0400MT. Overall inventory was properly updated and site visit found the rusty part of roof for scheduled waste store need to be repaired. This was noted and immediate action will be carried out. Current state still acceptable.</p> <p>Nevertheless, Based on the Waste Management Plan, it was found that empty chemical containers, waste of lead acid batteries and fluorescent tubes/lamps have been identified as Scheduled waste (SW 409, 102 and 109). However, from the inventory records (Record Number: AS(B)T:31/152/000/008) and latest record of SW Disposal, the were no evidence of inventory and disposal of SW 409, 102, and 109 in the mill.</p> <p>The used N-Hexane was identified as Scheduled Waste in Sungai Tong POM. Based on the interview, the used N-Hexane has been given back to the supplier. However there were no evidence that showed that the supplier has approval from DOE to handle the scheduled waste. Therefore a minor non-conformity was raised.</p>	
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Observed in Jaya Estate and Pinang Emas Estate not using fire for waste disposal during site visit at workers housing and staff quarters-1. Sampled in Sg. Tong POM, no use of fire for waste disposal and understanding is good among workers as confirmed during interview session conducted during site visit to Pinang Emas, Jaya Estates and Sg. Tong POM.</p>	Complied

Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>The brief version of the SOP was displayed at appropriate locations within the estates. Copies of the documented SOP were presented to the audit team for verification. It was observed that activities that were being implemented which involved safety & health, environmental, quality, employees and others had followed the established SOP.</p> <p>All the estates and mill operations were guided through the manuals and SOP. The procedures as documented in the manual and SOP were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The SOP included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security.</p> <p>Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.</p>	Complied
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Periodic tissue and soil sampling were carried out in the Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. The agronomic assessment and fertilizer recommendation were conducted by AAD (Agronomy and Advisory Dept of Head Office to formulate the FY2021/22 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been were carried out in all estates. The latest</p>	Complied

		being September 2021 (Jaya Estate) and August 2021 (Pinang Emas Estate).														
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>All the estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, bio compost mulching and application of compost. In addition, during replanting, palms were felled, chipped, windowed and left to decompose.</p> <p>Records showed that the estates had applied records of compost (20kg/palm) application in mt in 2021 was as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Field no</th> <th>Ha</th> <th>Mt</th> </tr> </thead> <tbody> <tr> <td>Jaya Estate</td> <td>2004B2</td> <td>134.40</td> <td>389.80</td> </tr> <tr> <td>Pinang Emas Estate</td> <td>PM17B1</td> <td>71.81</td> <td>194.10</td> </tr> </tbody> </table>	Estate	Field no	Ha	Mt	Jaya Estate	2004B2	134.40	389.80	Pinang Emas Estate	PM17B1	71.81	194.10	Complied	
Estate	Field no	Ha	Mt													
Jaya Estate	2004B2	134.40	389.80													
Pinang Emas Estate	PM17B1	71.81	194.10													
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer application monitoring forms, etc. Records of programs and applications of fertilizers were reviewed by auditors. Review of the records revealed that the actual fertilizers applied in 2020/21 was in line with the program. The following fertilizers were applied in estates on recommendation by the Agronomist.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Type of Fertiliser</th> <th>Bag/Mt</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Jaya Estate</td> <td>Mixture NK-1</td> <td>630 bag/31.5 mt</td> </tr> <tr> <td>MOP</td> <td>330 mt</td> </tr> <tr> <td rowspan="2">Pinang Emas Estate</td> <td>MOP</td> <td>6.4 mt</td> </tr> <tr> <td>AS-NK3</td> <td>53 mt</td> </tr> </tbody> </table>	Estate	Type of Fertiliser	Bag/Mt	Jaya Estate	Mixture NK-1	630 bag/31.5 mt	MOP	330 mt	Pinang Emas Estate	MOP	6.4 mt	AS-NK3	53 mt	Complied
Estate	Type of Fertiliser	Bag/Mt														
Jaya Estate	Mixture NK-1	630 bag/31.5 mt														
	MOP	330 mt														
Pinang Emas Estate	MOP	6.4 mt														
	AS-NK3	53 mt														

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>	Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. No problematic soil in sampling estate during assessment.	Complied
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>Like all TDM Estates, the 2 estates visited continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ol style="list-style-type: none"> Slope & River Protection Policy dated July 2020. Buffer Zone & 25-degree slope SOP Land Preparation for Terracing in SOP Section A ref A4. <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, compost application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in some mature areas. The cover crop mucuna bracteata had been planted along some slopes by management.</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>This compliance being addressed in the "Slope and River Protection" signed by the CEO dated July 2020 stating the following among others;</p> <p><i>"Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly".</i></p> <p>Nevertheless, there were no new plantings in both estates visited.</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	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Both soil and topography maps and information are available in the estates. Soil analysis is made on a 5 year cycle. However there is no peat soil or soil categorized as marginal or fragile soil at the estates visited.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys are done and available in a soil map at all estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no new planting in both the estates visited. There is no peat soil or soil categorized as marginal or fragile soil all estates visited.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	There is no new planting in both the estates visited. There is no peat soil or soil categorized as marginal or fragile soil all estates visited.	Not Applicable

7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.</p>	<p>Not Applicable</p>
7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>The water and ground cover management programme is documented in the TDM Standard Operating Procedure Section A ref A22 Management in Coastal and Peat lands). Details are described in 7.8.1. individual estates and mill had their respective water management plan mainly to monitor among others the following;</p> <ul style="list-style-type: none"> a. Monitor the quality of main water inlet/outlet for pollutants b. from estate’s operations. c. Water management and drainage system in the fields. d. Contingency during water shortage. e. Monitor the usage of fresh water on monthly basis f. Reuse/recycle waste water. 	<p>Complied</p>
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at all estates visited. Not applicable for this indicator.</p>	<p>Not Applicable</p>

7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at all estates visited. Not applicable for this indicator.</p>	<p>Not Applicable</p>
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at all estates visited. Not applicable for this indicator.</p>	<p>Not Applicable</p>
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
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> <ul style="list-style-type: none"> a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water. <p>- Minor compliance -</p>	<p>The Mill /estates had established its Water Management Plan for year 2021 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <ul style="list-style-type: none"> a. Implementation of rain water harvest, b. Construction of water gate and scheduled water pumping for c. effective management of field drains and field water level. d. daily monitoring of bund / scheduled maintenance e. Establishment of mucuna bracteata to prevent erosion, f. Side drain at field road to control water, frond stacking, g. Enhancement of ground vegetation at bare ground area. <p>As per sampling in Jaya estate, the management already using SATU (Syarikat Air Terengganu) as main source for Domestic usage.</p>	<p>Complied</p>

		<p>The Estates had implemented water managements plans which covered:</p> <ul style="list-style-type: none"> a. Water shortage contingencies b. Water pollution prevention c. Reduce wastage d. Identification & management of waste waters e. Monitoring rainfall f. Regular water quality analysis. 																					
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Water analysis been conducted by management by yearly as per HCV management plan. The latest result River water quality monitoring report was on August 2021 prepared by Eralab (KT) Sdn Bhd (Lab report No. 21/08/W0552).</p> <p>In Pinang Emas estate, the River Water Quality Monitoring Report by ERALab (KT) Sdn Bhd conducted in 14/6/2021 (Lab report No. 21/06/W0417). The result was compiled as referred NWQSM.</p>	Complied																				
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>Sampled Final discharge point of effluent found have clear signage. Sampling on monitoring for month of September dated 15/09/2021 (21/09/W0614) by ERALAB (KT) Sdn Bhd.</p> <table border="1" data-bbox="1137 1075 1926 1385"> <thead> <tr> <th>Parameter</th> <th>Units</th> <th>Result</th> <th>Test Method</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>-</td> <td>8.1</td> <td>APHA, 4500</td> </tr> <tr> <td>BOD</td> <td>mg/L</td> <td>54</td> <td>APHA, 5210</td> </tr> <tr> <td>Total Suspended Solid as TSS</td> <td>mg/L</td> <td>66</td> <td>APHA, 2540</td> </tr> <tr> <td>Ammoniacal Nitrogen as NH3N</td> <td>mg/L</td> <td>6.05</td> <td>APHA, 4500</td> </tr> </tbody> </table>	Parameter	Units	Result	Test Method	pH	-	8.1	APHA, 4500	BOD	mg/L	54	APHA, 5210	Total Suspended Solid as TSS	mg/L	66	APHA, 2540	Ammoniacal Nitrogen as NH3N	mg/L	6.05	APHA, 4500	Complied
Parameter	Units	Result	Test Method																				
pH	-	8.1	APHA, 4500																				
BOD	mg/L	54	APHA, 5210																				
Total Suspended Solid as TSS	mg/L	66	APHA, 2540																				
Ammoniacal Nitrogen as NH3N	mg/L	6.05	APHA, 4500																				

		Total Nitrogen as N	mg/L	9	APHA,4500	
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Verified Sungai Tong POM monitoring and recording the water usage as below:			Complied	
		Water usage		Total		
		FFB processed (mt)		195,816.74		
		Water Consumption (m3)		548,420		
		Water consumption/FFB process (m3/mt)		2.8		
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised						
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	The data of fossil fuel was available in estate and verified as per below detail.			Complied	
		Estate		Diesel usage (L)		
		Jaya Estate		68,581		
		Pinang Emas Estate		111,271		
		Sungai Tong POM		161,278		
		In Sungai Tong POM, Fiber & Shell been used as fuel for boiler, as per below record;-				
		Energy Used	July	Aug	Sept	
		Shell used (mt)	1,042.79	1,141.01	1,028.24	
		Fibre used (mt)	2,196.27	2,403.15	2,165.63	

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

Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.											
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>The Mill and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <p>a. The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment.</p> <p>b. Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.</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>Sg Tong Complex calculated the GHG using RSPO Palm GHG calculator Version 4.0 and the calculation option used is Option 1. The data have been verified against the raw data obtained from the mill and estates during the assessment and found to be tally with the data input.</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>The measurement of Dust Particulates Concentration were be conducted by Environmental Science (M) Sdn Bhd. Stack Flue Gas of Boiler No.1 (L-GB-TC2107CSN-0153) dated 13/07/2021 and Stack Flue Gas of Boiler No. 2 (L-GB-TC2109CSN-0103) dated 06/09/2021. Result as per below:-</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Stack</th> <th style="width: 40%;">Average Dust Concentration (mg/m3)</th> <th style="width: 40%;">Environmental Quality (clean air) Reg 2014,(mg/m3)</th> </tr> </thead> <tbody> <tr> <td rowspan="2" style="text-align: center;">Boiler no.1</td> <td style="text-align: center;">112.3 at 9.6% CO2</td> <td style="text-align: center;">-</td> </tr> <tr> <td style="text-align: center;">140.6 at 12.0% CO2</td> <td style="text-align: center;">150</td> </tr> </tbody> </table>	Stack	Average Dust Concentration (mg/m3)	Environmental Quality (clean air) Reg 2014,(mg/m3)	Boiler no.1	112.3 at 9.6% CO2	-	140.6 at 12.0% CO2	150	Complied
Stack	Average Dust Concentration (mg/m3)	Environmental Quality (clean air) Reg 2014,(mg/m3)									
Boiler no.1	112.3 at 9.6% CO2	-									
	140.6 at 12.0% CO2	150									

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

		Boiler no. 2	136.9 at 4.3% CO2	-					
			380.9 at 12.0% CO2	150					
		The License Violation has been given by DOE (Referred License No: 004079; valid from 05/06/2021 until 31/12/2021), stated TDM Sg. Tom POM may violate the Environmental Quality (clean air) Reg 2014,(mg/m3) as below.							
		Item	Identification no.	Parameter Pollution				Limitation produce (mg/m3)	
		Boiler	1	Total Particulate matter				400	
		Boiler	2	Total Particulate matter	400				
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area									
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	It was verified that no replanting were prepared by burning at Field No. 2020A area. TDM Plantation has established Zero Burning Policy and documented in Occupational Safety, Health and Environmental Policy signed by the CEO				Complied			
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	No use of fire for land preparation during replanting as sighted at replanting of visited estates. No open burning noted based on the records on the land clearing and felling for the replanting work. Method of land clearing and preparation was used such as (felling & chipping, cambering/land forming and path construction). Sungai Tong Certification Unit have establishes fire prevention and control measures for the individual units in form of Fire emergency Response Plan, formation of Fire Emergency Response Team, usage of Fire Extinguishers and others.				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>Stakeholder consultation conducted on 07/09/2021 at Akedemi TDM at 9.00 am. A requirement of zero burning as stated in the policy, the prevention and measure were highlighted and explained to all stakeholders that attended.</p>	Complied
<p>Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>There were no land clearing for plantation damaging primary forest or any required to be protected area under HCVs or HCS forest since 2018 as verified in in the sampled estates.</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>Based on the Bio-Diversity Assessment by SRA Consultancy on 18/3/12 – 19/4/2012 (report dated May 2012) which had covered all estates and mill under Sg Tong Complex, there were no HCV identified in the mill and both sampled estates.</p> <p>HCV Toolkit for Malaysia by WWF – Malaysia was used. There were appropriate consultation processes as per the HCV Toolkit- Malaysia which covers the three main components of identification, management and monitoring.</p> <p>There were no area considered as HCV No RTE species at Jaya Estate and Pinang Emas Estate was recorded in the report. The were no new planting in both the sampled estates as well.</p>	Complied

7.12.3	<i>Indicator is not applicable in Malaysia context</i>	-	Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>Based on the Bio-Diversity Assessment by SRA Consultancy on 18/3/12 – 19/4/2012 (report dated May 2012) which had covered all estates and mill under Sg Tong Complex, there were no HCV identified in the mill and both sampled estates. However the streams that passes through Field 94 in Penang Emas has been treated as a conservation area and has been maintained with appropriate buffer zones. During the visit o the site it was identified that there were appropriate signages being erected at the location prohibiting activities such as fishing, chemical and fertiliser application. There were no evidence of chemical or fertiliser being applied at the mentioned area. The estate has also established an action plan to monitor this area which includes creating awareness towards workers and staff on protection of the area.</p>	Complied
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>No reduction of rights of HCV or HCS forest or other conservation areas affected local communities in sampling Estates.</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>Sighted action Management Plan on Biodiversity Assessment. RTE encounter will be reported to Perhilitan, a signboard on no hunting will be erected and continuous monitoring will be done. Latest monitoring was done on Sept 2021, this monitoring was done every two months once as per verification on the record.</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>Sighted action Management Plan on Biodiversity Assessment. Action plans were clearly established to monitor HCV and conservation area to be implemented, monitor and reported.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>There has been no land clearing that required HCV and HCSA assessment in Jaya Estate and Pinang Emas Estate.</p>	Not Applicable

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** for **Sungai Tong 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 **Sungai Tong POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.81
PKO	0.81

Extraction	%
OER	18.85
KER	3.89

Production	t/yr
FFB Process	196,764.74
CPO Produced	37,080.36
PKO Produced	7,662.11

Land Use	Ha
OP Planted Area	17,195.79
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	17,195.79

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	9,4418.05	0.60	0	0	0	0	94,418.05	0.60
CO ₂ Emission from fertilizer	5,003.23	0.03	0	0	0	0	5,003.23	0.03
NO ₂ Emission	3,657.22	0.02	0	0	0	0	3,657.22	0.02
Fuel Consumption	850.73	0.01	0	0	0	0	850.73	0.01
Peat Oxidation	0	0.00	0	0	0	0	0	0.00
Sink								
Crop Sequestration	-81,975.22	-0.52	0	0	0	0	-81,975.22	-0.52
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	21,954.02	0.14	0	0	5,408.94	0	27,362.95	0.14

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	8,563.09	0.04
Fuel Consumption	503.19	0.00
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	9,066.28	0.04

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.

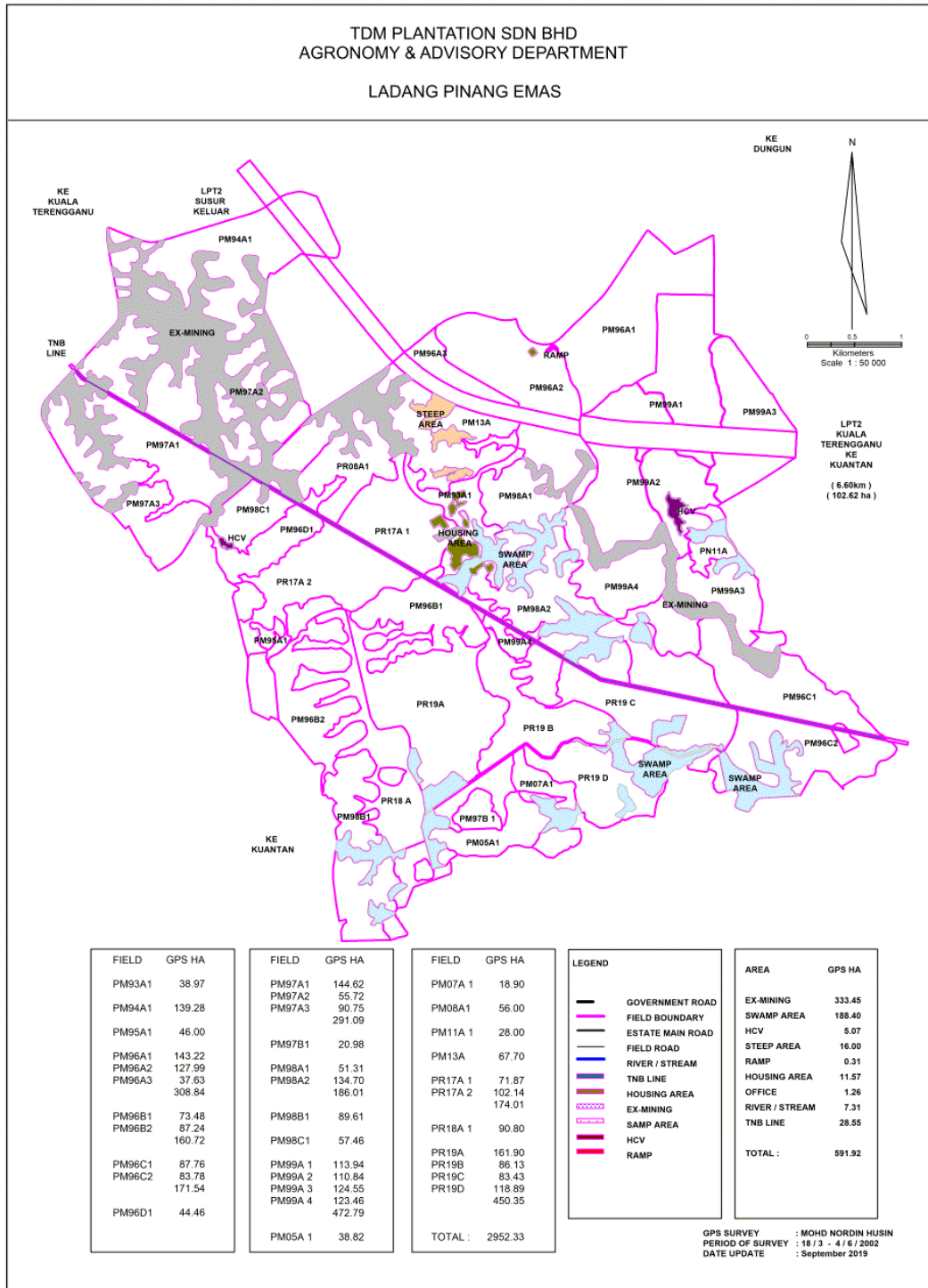
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

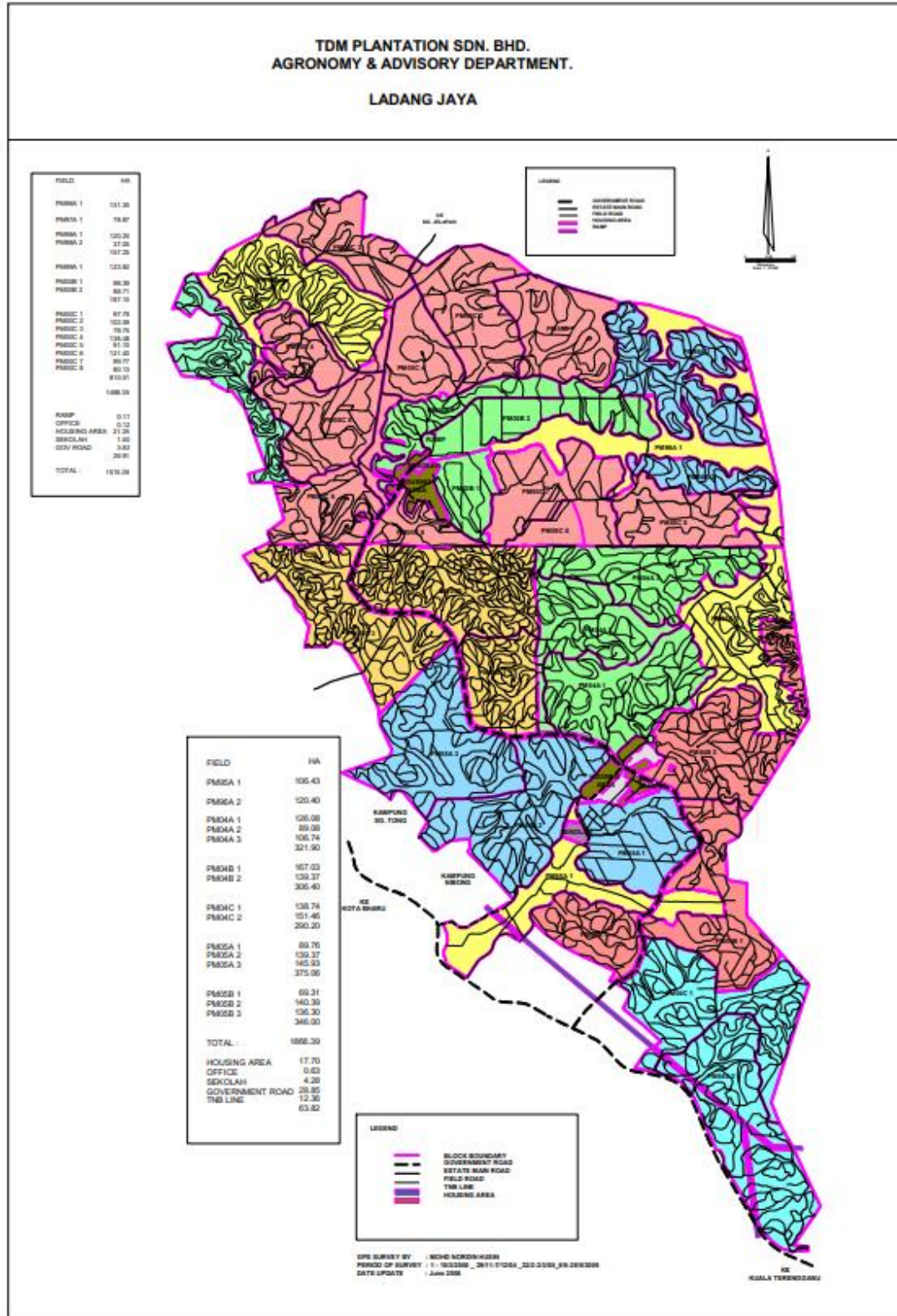
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map





Appendix E: List of Smallholder Registered and sampled

Not Applicable

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
EIE	Environmental Impact Evaluation
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
STPOM	Sungai Tong Palm Oil Mill
TDMP	TDM Plantation