

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (2\_1 & 2\_2)
- Recertification Assessment (Choose an item.)
- Extension of Scope

<b>Sime Darby Plantation Berhad</b>
Client company Address: Level 3, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia
Certification Unit: <b>Strategic Operating Unit (SOU9) West Palm Oil Mill</b>
Location of Certification Unit: 42960 Carey Island, Selangor, Malaysia
Date of Final Report: 10/08/2022

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## Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	Sime Darby Plantation Berhad		
<b>RSPO Membership Number</b>	1-0008-04-000-00	<b>Membership Approval Date</b>	07/09/2004
<b>Address</b>	Level 3, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Strategic Operating Unit (SOU 9) – West Palm Oil Mill		
<b>Location / Address</b>	42960 Carey Island, Selangor, Malaysia		
<b>Website</b>	<a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a>		
<b>Management Representative</b>	Shylaja Devi Vasudevan Nair Md Rapit Bin Suman (SOU Chairman)	<b>E-mail</b>	<a href="mailto:shylaja.vasudevan@simedarbyplantation.com">shylaja.vasudevan@simedarbyplantation.com</a> <a href="mailto:rapit.suman@simedarbyplantation.com">rapit.suman@simedarbyplantation.com</a>
<b>Telephone</b>	+(603) 78484379	<b>Facsimile</b>	NA

2. Certification Information			
<b>Certificate Number</b>	RSPO 543594	<b>Certificate Start Date</b>	19/05/2020
<b>Date of First Certification</b>	19/5/2010	<b>Certificate Expiry Date</b>	18/05/2025
<b>Scope of Certification</b>	Production of Palm Oil and Palm Kernel		
<b>Visit Objectives</b>	The objective of the assessment was to conduct an annual surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by West POM and Supply Base's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives. This audit is based on RSPO Contingency Audit Procedure under scenario 4 with total 150% of audit man days to be delivered during ASA2_2 onsite audit covering ASA2_1 samples.		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_1 and ASA2_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	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		
<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	50 mt/Hr

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<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable
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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE107-70041221	International Sustainability and Carbon Certification	agroVet certification	16/04/2022
MSPO 682052	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	12/02/2023
MSPO 690774	MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	12/02/2023

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
West POM	KKS West, Carey Island, 42960 Selangor, Malaysia	2° 54' 20" N	101° 21' 42" E
West Estate	Ladang West, Carey Island 42960, Selangor, Malaysia	2° 54' 17" N	101° 21' 13" 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
West Estate	5,064.64	45.75*	645.30	5,755.69	86%
<b>Total</b>	<b>5,064.64</b>	<b>45.75</b>	<b>645.30</b>	<b>5,755.69</b>	<b>86%</b>

**Notes:** \*Due to recent reassessment of HCV, 111.25 Ha which is consists of agroforest and arboretum had been reclassified as non-HCV. This year, the 111.25 Ha area is included under "Infrastructure & Other".

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
West Estate	659.49	888.40	2,913.40	603.35	0	4,405.15	659.49
<b>Total (ha)</b>	<b>659.49</b>	<b>888.40</b>	<b>2,913.40</b>	<b>603.35</b>	<b>0</b>	<b>4,405.15</b>	<b>659.49</b>

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<b>7. Summary of Certified Tonnage of FFB (Own Certified Scope)</b>				
Estate / Smallholders	Tonnage / year			
	Estimated last year (May 20 – Apr 22)	Actual (Mar 20 – Jan 22)		Forecast (May 22 – Apr 23)
		Previous license period (Mar 2020 – Apr 2021)	Current license period (May 2021 – Jan 2022)	
West Estate	280,475.44	89,155.30	103,702.43	151,939.20
<b>Total</b>	<b>280,475.44*</b>	<b>192,857.73</b>		<b>151,939.20</b>

**Notes:** \*Exclude approved extension volume of FFB: 45,000mt CPO: 9,000mt PK: 2,250mt

<b>8. Summary of Certified Tonnage of FFB (from other certified unit(s))</b>				
Estate / Smallholders	Tonnage / year			
	Estimated last year (May 20 – Apr 22)	Actual (May 20 – Jan 22)		Actual (May 22 – Apr 23)
		Previous license period (Mar 2020 – Apr 2021)	Current license period (May 2021 – Jan 2022)	
East Estate		45,290.96	74,638.26	
Dusun Durian Estate		2,501.63	1,335.61	
Sepang Estate		3,297.83	1,655.53	
Bukit Talang Estate		0	36.29	
Sungai Buloh Estate		0	236.61	
<b>Total</b>		<b>128,992.72</b>		

<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
Out growers / smallholders	Tonnage / year			
	Estimated last year (May 20 – Apr 22)	Actual (May 20 – Jan 22)		Actual (May 22 – Apr 23)
		Previous license period (Mar 2020 – Apr 2021)	Current license period (May 2021 – Jan 2022)	
Smallholders, Out growers and FFB Traders	N/A			
<b>Total</b>				

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<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply base (mt)</b>	<b>Volume of FFB from uncertified supply base (mt)</b>	<b>Total FFB/Month (mt)</b>
1	Mar 20	12,971.88	-	12,971.88
2	Apr 20	16,745.81	-	16,745.81
3	May 20	15,043.40	-	15,043.40
4	June 20	15,249.43	-	15,249.43
5	July 20	14,547.05	-	14,547.05
6	Aug 20	13,482.63	-	13,482.63
7	Sept 20	14,308.82	-	14,308.82
8	Oct 20	11,759.79	-	11,759.79
9	Nov 20	11,358.45	-	11,358.45
10	Dec 20	11,050.92	-	11,050.92
11	Jan 21	13,860.91	-	13,860.91
12	Feb 21	9,584.32	-	9,584.32
13	Mar 21	16,156.21	-	16,156.21
14	Apr 21	19,079.78	-	19,079.78
15	May 21	16,731.65	-	16,731.65
16	June 21	15,136.08	-	15,136.08
17	July 21	16,457.85	-	16,457.85
18	Aug 21	10,756.21	-	10,756.21
19	Sept 21	16,309.51	-	16,309.51
20	Oct 21	14,752.36	-	14,752.36
21	Nov 21	15,428.63	-	15,428.63
22	Dec 21	9,045.23	-	9,045.23
23	Jan 22	12,033.53	-	12,033.53
<b>TOTAL</b>		<b>321,850.45</b>	<b>-</b>	<b>321,850.45</b>

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<b>10. Summary of Certified Tonnage (not applicable for ISS)</b>			
<b>Estimated last year (May 20 – Apr 22)</b>	<b>Actual (Mar 20 – Jan 22)</b>		<b>Forecast (May 22 – Apr 23)</b>
	Previous license period (Mar 2020 – Apr 2021)	Current license period (May 2021 – Jan 2022)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
325,475.44 mt	159,963.41 mt	161,887.04 mt	151,939.20 mt
	321,850.45 mt		
<b>CPO (OER: 21.00 %)</b>	<b>CPO (OER: 20.54 %)</b>		<b>CPO (OER: 21.00 %)</b>
67,439.84 mt	32,965.71 mt	33,154.12 mt	31,907.23 mt
	66,119.83 mt		
<b>PK (KER: 5.00 %)</b>	<b>PK (KER: 5.00 %)</b>		<b>PK (KER: 5.00 %)</b>
16,473.77 mt	8,124.19 mt	7,847.07 mt	7,596.96 mt
	15,971.26 mt		

<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	Mar 20	2,735.55	661.20
2	Apr 20	3,394.32	888.48
3	May 20	2,968.47	795.75
4	June 20	3,131.18	833.30
5	July 20	3,006.17	711.59
6	Aug 20	2,840.26	723.925
7	Sept 20	3,074.32	767.42
8	Oct 20	2,470.25	587.69
9	Nov 20	2,349.95	527.62
10	Dec 20	2,201.48	523.86
11	Jan 21	2,806.28	658.88
12	Feb 21	1,987.48	444.47
13	Mar 21	3,229.334	743.003
14	Apr 21	3,847.835	925.560
15	May 21	3,381.913	779.879
16	June 21	3,169.467	722.407
17	July 21	3,475.344	840.262
18	Aug 21	2,235.142	547.780
19	Sept 21	3,381.833	816.855

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20	Oct 21	3,065.083	733.305
21	Nov 21	3,089.767	743.713
22	Dec 21	1,873.537	442.544
23	Jan 22	2,404.869	551.766
<b>TOTAL</b>		<b>66,119.83</b>	<b>15,971.26</b>

<b>11. Summary of Actual Volume sold</b>					
<b>Current License period (May2021 – Jan 2022)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	19,342.95	2,043.61	0	11,667.27	33,053.83
<b>PK (MT)</b>	6,887.39	0	0	950.68	7,838.07
<b>Credits</b>	0	0	0	0	0
<b>Previous License period (Mar 2020 – Apr 2021)</b>					
<b>CPO (MT)</b>	23,807.34	1,476.15	0	7,671.17	32,954.66
<b>PK (MT)</b>	7,277.93	0	0	827.96	8,105.89
<b>Credits</b>	0	0	0	0	0

<b>11A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Non-disclosure 1	N/A	43,150.29	-
2	Non-disclosure 2	N/A	-	14,165.32
<b>TOTAL</b>			<b>43,150.29</b>	<b>14,165.32</b>

<b>11B. Records of CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Non-disclosure 3	ISCC	3,519.76	-
<b>TOTAL</b>			<b>3,519.76</b>	<b>N/A</b>

<b>11C. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Non-disclosure 4	19,338.44	-



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2	Non-disclosure 5	-	1,778.64
<b>TOTAL</b>		<b>19,338.44</b>	<b>1,778.64</b>

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

<b>12. Independent Smallholders Certified Tonnage / Volume</b>									
Phase	Estimated last year (NA)			Actual (NA)			Forecast (NA)		
	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	-	-		-	-		-	-	

<b>13. Independent Smallholders Actual Sold Tonnage / Volume</b>						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
<b>Current License period (NA)</b>						
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](mailto:Nicholas.Cheong@bsigroup.com))  
Website: [www.bsigroup.com](http://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 7-11/2/022. The audit programme is included as Section 2.3.

The Critical NC close out on-site assessment was conducted on 22/4/2022.

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. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24th March 2020. The remote audit was conducted on key in 1/3/2021.

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.

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
West POM	✓	✓	✓	✓	✓
West Estate	✓	✓	✓	✓	✓

**Tentative Date of Next Visit: February 6, 2023 - February 9, 2023**

**Total Number of Mandays: 9.5 Mandays**

**2.2 BSI Assessment Team**

Name	Role	Competency
Mohamed Hidhir Bin Zainal Abidin (MH)	Team Leader	<p><b>Education:</b> Holds a Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006.</p> <p><b>Work Experience:</b> 4½ years working experience in palm oil industry specifically in palm oil mill as Mill Engineer. More than 10 years of auditing experience with accredited certification body for several schemes include ISO9001, ISO14001, OHSAS18001 (now ISO45001), RSPO, MSPO and RBA Labor Ethics</p> <p><b>Training attended:</b> He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, MSPO Awareness Training, Endorsed RSPO SCCS Lead Auditor Course, HCV &amp; HCS Introductory Training and SMETA Requirements Training.</p> <p><b>Aspect covered in this audit:</b> Legal requirements, policies and commitment, social aspects, contract agreement, human rights, land use rights, workers’ welfare, and supply chain.</p> <p><b>Language proficiency:</b> English and Bahasa Malaysia</p>
Vijay Kanna Pakirisamy (VK)	Team Member	<p><b>Education:</b> Holds a Bachelor Degree in Agribusiness Science Management with Honours, University Utara Malaysia.</p> <p><b>Work Experience:</b> He has 10 years’ experience in Oil Palm Estate Management in leading Oil Palm Companies such as KL Kepong Bhd, IOI Plantations and United Plantations. The last position held was Senior Assistant Manager. His experience includes the day-to-day estate operations</p>

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		<p>and ensured the implementation of RSPO, ISCC and MSPO certification. He has been an sustainable palm oil auditor since 2019.</p> <p><b>Training attended:</b> He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, HCV &amp; HCS Introductory Training g and SMETA Requirements Training, RSPO Independent Smallholder (IHS) Auditor Training.</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of Environmental Best Practises, HCV and supply chain requirements.</p> <p><b>Language proficiency:</b> He is fluent in English, Bahasa Malaysia, Tamil.</p>
Amir Bahari (AB)	Team Member	<p><b>Education:</b> Holds a Bachelor of Science (Hons) in Chemistry, University Science Malaysia &amp; a Diploma in Palm Oil Milling Tech/Management, Malaysian Palm Oil Board.</p> <p><b>Work Experience:</b> He has more than 30 years of plantation experience including managing rubber factories, palm oil mills and estates. Since 2014 he has started auditing professionally for varies scheme including RSPO and MSPO for varies accredited certification body.</p> <p><b>Training attended:</b> He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course &amp; Endorsed RSPO P&amp;C Lead Auditor Course.</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of Environment, HCV and estate best practises.</p> <p><b>Language proficiency:</b> He is fluent in both verbal/written in Bahasa Malaysia and English.</p>

**Accompanying Persons:**

Name	Role
-	-

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**1.3 Assessment Plan**

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

Date	Time	Subjects	MH	VK	AB
Sunday 6/2/2022	PM	Audit team travel to Teluk Panglima Garang. Check in at Zone Hotels, Teluk Panglima Garang	√	√	√
Monday 7/2/2022  <b>West Estate</b>	0800	Audit team travel to West Estate Opening Meeting:	√	√	√
	0830 - 0900	<ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation).</li> <li>Verification on previous audit findings</li> </ul>			
	0900 - 1300	<b>West Estate</b> 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.	√	√	√
	1300 - 1400	Lunch	√	√	√
	1400 - 1630	Continue with unfinished elements	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Tuesday 8/2/2022  <b>West Estate</b>	0830 - 1300	<b>West Estate</b> 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).	√	√	√
	1000 - 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1300 - 1400	Lunch	√	√	√
	1400 - 1630	Continue with unfinished elements	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Wednesday 9/2/2022  <b>West POM</b>	0830 - 1300	<b>West POM</b> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area.	√	√	√
	1000 - 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1300 - 1400	Lunch break	√	√	√
	1400 - 1630	Continue with unfinished elements	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√

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Thursday 10/2/2022  <b>West POM</b>	0830 - 1300	<b>West POM</b> Document Review P1 – P7: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc	√	√	√
	1300 - 1400	Lunch break	√	√	√
	1300 - 1630	Continue with unfinished elements	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Friday 11/2/2022  <b>West POM</b>	0830 - 1230	Continue with outstanding/pending issues.	√	√	√
	1230 - 1330	Lunch break	√	√	√
	1330 - 1530	RSPO Supply chain requirements for mill - Identity Preserved Module - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities - Record keeping - Extraction Rate - Processing - Registration of transaction - Claims	√	√	-
	1530 - 1600	Audit team discussion and closing meeting	√	√	√
	1600 - 1700	Closing meeting: conclusion and recommendation	√	√	√
	1700	End of audit			

**Major NC close out verification**

Time	Subjects	Mohd Hidhir
<b>Thursday PM</b>	Travel to Teluk Panglima Garang. Check in at Zone Hotel	√
<b>Friday 22/4/2022 0745 0830 – 0845</b>	Auditor travel to West Estate Opening Meeting <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Briefing on the verification plan</li> </ul>	√
0845 – 1130	West Estate/Mill – Verification on previous Major NC. 2163206-202202-M1 – document review and workers interview (West Estate) 2163206-202202-M2 – Site observation, workers/stakeholder interview	√

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Time	Subjects	Mohd Hidhir
	(individual and group session) and document review (West Estate) 2163206-202202-M3 – Site observation, workers/stakeholder interview (individual and group session) and document review (West Estate & Mill)	
1130 – 1200	Closing meeting - conclusion and recommendation	√

### Section 3: Assessment Findings

#### 3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	<p>Yes. SDP TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p> <p><a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations">http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</a></p>	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	<p>Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1st Oct 2018, the mill has completed the selling off transaction.</p> <p>In Indonesia, PT Mitral Austral Sejahtera was sold and currently SDP have no control in the management.</p>	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.	No. There is no new acquisitions as at latest TBP 2021.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Although there are deviation has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.	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?	<p>Yes.</p> <p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties was sold and currently Sime Darby Plantation Berhad have no control in the management.</p>	Complied



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	<p>The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019.</p> <p>Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: <a href="http://www.rspo.org/certification/public-announcement">www.rspo.org/certification/public-announcement</a></p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): <a href="http://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations">www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations</a>.</p> <p>ACOP 2020 has been cross-referenced as below: <a href="http://www.rspo.org/members/29">www.rspo.org/members/29</a></p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised</p>	<p>Although there lapses has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>	<p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as these 2 assets were disposed.</p>	<p>Complied</p>
<p><b>Un-Certified Units or Holdings</b></p>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&amp;C criterion 7.12.</p>	<p>Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units.</p>	<p>Complied</p>
<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification</p> <p>1. NBPOL (Poliamba Limited) 23/05/2020 – no</p>	<p>Complied</p>

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	<p>comments</p> <p><a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited">https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited</a></p> <p>2. NBPOL (Guadalcanal Plain Palm Oil Ltd)  06/04/2018 – no comments</p> <p><a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-a-subsi-dary-of-sime-darby-plantationbhd-guadalcanal-plain-palm-oil-ltd">https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-a-subsi-dary-of-sime-darby-plantationbhd-guadalcanal-plain-palm-oil-ltd</a></p> <p>3. NBPOL (Ragu Agri Industries Limited)  29/01/2018 – no comments</p> <p><a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd">https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd</a></p> <p>4. NBPOL (Ragu Agri Industries Limited)  02/09/2016 – no comments</p> <p><a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-ramu-agri-industries-limited">https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-ramu-agri-industries-limited</a></p> <p>5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments</p> <p><a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-higaturu-oil-palms">https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-higaturu-oil-palms</a></p> <p>6. NBPOL (Poliamba Limited – Lamawan)  07/04/2014 – no comments captured in RSPO Website</p> <p><a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamawan-png">https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamawan-png</a></p> <p>7. NBPOL (Poliamba Limited – Lamendauen)  07/04/2014 – no comments captured in RSPO Website</p> <p><a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamendauen-png">https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamendauen-png</a></p> <p>8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website</p> <p><a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-roka-mini-estate">https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-roka-mini-estate</a></p> <p>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website</p> <p><a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate">https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate</a></p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website</p>	
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	<p><a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-limited-higaturu-oil-palm">https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-limited-higaturu-oil-palm</a></p> <p>11. Sime Darby (Liberia) Plantation Inc 06/03/2012          – no comments captured in RSPO website  <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc-new-planting-assessment">https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc-new-planting-assessment</a></p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012          – no comments captured in RSPO website  <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment1">https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment1</a></p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012          – no comments captured in RSPO website  <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment">https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment</a></p> <p>Management units for 11 – 13 above were disposed.</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancy between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of 14/07/2021, 10 LUCAs were approved with 0 conservation liability and remaining 9 are still pending from RSPO.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 4.2</p>	<p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>Sime Darby Plantation maintain corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes,</p>	<p>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue</p>	<p>Complied</p>

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a positive assurance statement shall be available and justified.	are mainly awaiting for Land Titles. The last audit was conducted between August 2021.  The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.	
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No any critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company.	Complied

**3.2 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
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 is no scheme smallholders and/ or outgrowers include in the scope of certification.	Complied

**Approved Time Bound Plan**

**SDP - RSPO Certification for Time Bound Plan - Malaysia Operations**

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

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

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

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



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

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

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		Kelida Estate					
		Lavang (Special) Estate					
		Pekaka Estate					
		Ruai Estate					
		Dulang Estate					
		Charquest Estate					
		Paroh Estate					
32	Rajawali	Rajawali Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Rajawali Estate					
		Samudera Estate					
		Semarak Estate					
		Bayu Estate					
33	Derawan	Derawan Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Derawan Estate					
		Sahua Estate					
		Takau Estate					
		Damai Estate					
34	Pekaka	Pekaka Mill	-	Bintulu, Sarawak	Withdrawn	NA	Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang.
35	Bintang	Bintang Oil Mill	-	Johor	NA	NA	* SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on

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

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

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

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		Gunung Kemas Estate			Kotabaru District – South Kalimantan				
		Laut Timur Estate							
		Pantai Timur Estate							
		KKPA MBP	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.	
10	PT Guthrie Pecconina	Rantau Panjang Mill	-	-	Musu Banyuasin District – South Sumatera	Certified	16/03/2012	Remarks: Land legalisation process for 4152.70 ha is still in process.	
		Rantau Panjang Estate							
		Bumi Ayu Estate							
		Karang Ringin Estate							
		Napal Estate							
		Mangun Jaya Estate							
		Sungai Jernih Estate and GPI KKPA Estate	2023	-					-
11	PT Laguna Mandiri	Rantau Mill	-	-	Kotabaru District – South Kalimantan	Certified	30/12/2011		
		Rantau Estate							
		Matalok Estate							
		Betung Mill							01/04/2014
		Betung Estate							
		Sekayu Estate							
12		Sekunzir Mill	-	-		Certified	23/11/2010	-	

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

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



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

**SDP - RSPO Certification for Time Bound Plan – New Britain Palm Oil (NBPOL) Operations (as at March 2021)**

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name						
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	-	Guadalcanal Province, Solomon Islands	Certified	18/03/2011	-
		Tetere Estate					
		Ngalimbiu Estate					
		Mbalisuna Estate					
		Smallholders – West Zone (83)					
		Smallholders – Central Zone (53)					

		Smallholders – MBA East Zone (59)					
		Smallholders – MBE East Zone (37)					
2	Milne Bay Estate (MEB)	Hagita Oil Mill	-	Milne Bay Province, PNG	Certified	15/02/2018	-
		Giligili Estate					
		Hagita Estate					
		Waigani Estate					
		Sagarai Estate					
		Padipadi Estate					
		Mariawatte Estate					
		Smallholders – East Gurney Estate (264)					
		Smallholders – West Gurney Estate (229)					
		Smallholders – East Sagarai Estate (157)					
		Smallholders – West Sagarai Estate (221)					
3	Poliamba (POL)	Poliamba Oil Mill	-	New Ireland Province, PNG	Certified	19/03/2012	-
		Kara Estate					
		Nalik Estate					
		West Coast Estate					
		Noatsi Estate					
		Madak Estate					
		Smallholders -North Division (615)					
		Smallholders- South Division (868)					
		Smallholders -West Division (309)					
4	Ramu Agricultural Industrial Ltd (RAIL)	Gusap Mill	-	Morobe Province, PNG	Certified	05/08/2010	-
		Gusap East (Gusap) Estate					

		Gusap West (Paddox) Estate					
		Surinam Estate					
		Dumpu Estate					
		Ngaru Estate					
		J Estate (Jephcott) Estate					
		Smallholders - Madang VOPs (71)					
		Smallholders - Morobe VOPs (253)					
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	-	Oro Bay Province, PNG	Certified	01/02/2013	-
		Mamba Oil Mill					
		Embi Estate					
		Ambogo Estate					
		Sangara Estate					
		Sumbiripa Estate					
		Mamba Estate					
		Sambogo Estate					
		Scheme Smallholder Sorovi Division(2019)					
		Scheme Smallholder Saiho Division(842)					
		Scheme Smallholder Aeka Division (911)					
		Scheme Smallholder Igora Division (1367)					
		Scheme Smallholder Ilimo Division (671)					
6	West New Britain (WNB)	Mosa Oil Mill	-	Kimbe, West New Britain, PNG	Certified	10/09/2008	-
		Kumbango Oil Mill					
		Kapiura Mill					

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

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

**3.3 Details of Nonconformities**

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were three (3) Critical; two (2) Minor nonconformities and Nil Opportunity For Improvement raised. The *West 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.

<b>Non-conformity</b>			
<b>NCR Ref #</b>	2163206-202202-M1	<b>Date Issued</b>	11/2/2022
<b>Due Date</b>	11/5/2022	<b>Date of nonconformity Closure</b>	10/5/2022
<b>Clause &amp; Category (Critical / Minor)</b>	3.4.3 (Critical)		
<b>Statement of Nonconformity:</b>	Social management and monitoring plan for FY2021 had not been reviewed and updated in a participatory way		
<b>Requirement Reference:</b>	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		
<b>Objective Evidence:</b>	West Estate Site specific internal stakeholders/workers based on issue as discussed in the "estate matters" logbook/Union meeting log book. <ul style="list-style-type: none"> <li>- Breach of contract agreement/contract substitution (check-roll worker)</li> <li>- Breach of contract agreement/Vendor Integrity Pledge/compliance declaration (contractor)</li> <li>- Domestic violence issue, based on meeting minute dated 10/3/21</li> <li>- Gambling issue, based on meeting minute dated 10/3/21</li> </ul> The above issues were not captured in the latest SIA management plan and yet to be updated in a participatory way.		
<b>Corrections:</b>	To include the above issues in social management plan and review accordingly		
<b>Root Cause Analysis:</b>	Social management and monitoring plan reviewed however does not include site-specific internal stakeholder/workers. All issues have been discussed and resolved separately based on the issue raised		
<b>Corrective Actions:</b>	To update/review social management plan on quarterly basis		
<b>Assessment Conclusion:</b>	Major NC close out verification: i) Social management plan FY2021/2022 has been revised to include specific component on worker's issue from various avenues. Issues as highlighted such as domestic violence's, alcoholism, gambling and other related breach on contract issues. Social management plan dated 4/4/2022 is referred to. ii) Additional mechanism to capture the social issue is by using social dialog tracker before incorporating in the plan. The latest issue capture and updated in the management plan dated 4/4/22.		

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	<p>iii) Interview with the NUPW/MAPA and worker's representatives have confirmed on the understanding and how the issue being address by management. Result of resolutions being communicated and communicated during social dialog and other meetings as well.</p> <p>Implemented action found to be sufficient to close the major NC on 10/5/2022. Continuous implementation will be further verified in the next surveillance</p>
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Non-conformity			
<b>NCR Ref #</b>	2163206-202202-M2	<b>Date Issued</b>	11/2/2022
<b>Due Date</b>	11/5/2022	<b>Date of nonconformity Closure</b>	10/5/2022
<b>Clause &amp; Category (Critical / Minor)</b>	7.8.2 (Critical)		
<b>Statement of Nonconformity:</b>	Main drain adjacent to a palm field was not protected from spraying activities based on 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017)		
<b>Requirement Reference:</b>	<p>i) 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>ii) BMPs for the management and rehabilitation of riparian reserves' (April 2017): 2.1.5 ARTIFICIAL DRAINAGE CHANNELS - For artificial channels draining directly into natural waterways, bank erosion and spraying of chemicals close to the water's edge should be minimised. Leaving narrow strips (e.g. 10m wide) of unsprayed vegetation like shrubs and grasses, alongside artificial drainage channels, as well as minimising the amount of disturbances (e.g. from dredging) inside the channels, would reduce the amount of pollutants entering natural waterways via artificial channels, particularly during flooding events.</p>		
<b>Objective Evidence:</b>	Site visit on 08/02/2022 field no P09G observed there were traces of spraying being made at entire row edge of main drain/watercourse leading to TG20 with onwards flow to the estuary stream / sea.		
<b>Corrections:</b>	To cease spraying at main drain leading to natural water course		
<b>Root Cause Analysis:</b>	Information with regards to spraying at artificial drain towards natural water source is not being brief and lack of awareness by the Management		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Plant Nutrient &amp; Protection (PNP) unit will work together the Operating Unit (OU) to mark-up the main drain heading towards water course in the map.</li> <li>2. To erect a signboard says "No Chemical Spraying' at main drain leading to tide gate</li> <li>3. To educate sprayer gang on the requirement</li> </ol>		
<b>Assessment Conclusion:</b>	Major NC close out verification:		

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	<p>i) Briefing to cease spraying operation at main drain was carried out on 22 &amp; 23/3/22. Interview with the group of sprayers has confirmed on the understanding of prohibition of spraying activity at the main drain.</p> <p>ii) Identification and marking of the main drain leading to tide gate was done with R&amp;D team. Location of signages (No chemical spray) marked in the map and verified during site verification. Erection of signages clearly visible at [09G: tide gate 20, 2020A. tide gate 19]. Implemented action found to be sufficient to close the major NC on 10/5/2022. Continuous implementation will be further verified in the next surveillance</p>
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Non-conformity			
<b>NCR Ref #</b>	2163206-202202-M3	<b>Date Issued</b>	11/2/2022
<b>Due Date</b>	11/5/2022	<b>Date of nonconformity Closure</b>	10/5/2022
<b>Clause &amp; Category (Critical / Minor)</b>	3.6.2 (Critical)		
<b>Statement of Nonconformity:</b>	The effectiveness of the Health and Safety Plan were inadequately monitored in the mill and estate.		
<b>Requirement Reference:</b>	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
<b>Objective Evidence:</b>	<p>The effectiveness of the Health and Safety Plan were inadequately monitored in the mill and estate based on the evidence as below:</p> <p>West POM</p> <p>The Audiometric Testing (Baseline &amp; Annual) was conducted by for a total of 110 employees on 19/04/2021. Of the 110 employees tested, 6 employees were found to have hearing impairment at different levels and 4 employees were found to have standard threshold shift (STS). Employees with STS were required to be repeat audiometric test within 3 months (19/07/2021). Due to the report received late, on 29/09/2021 the retest was only conducted on 27/12/2021. Nevertheless, it was verified that only 2 out of 4 workers have been retested according to the recommendation and the balance 2 workers have yet to be retested as of to date.</p> <p>West Estate</p> <ol style="list-style-type: none"> <li>1. Onsite implementation for PPE contrary with PPE checklist report dated 7/2/2022 for power spraying gang. During the visit to Field 20E, it was noticed that the 2 power sprayer attendants were not wearing respirator during the operation. Reference made to HIRARC for Power Spraying – Mature Fields reviewed on 15/12/2021. The HIRARC stated Work Activity: Spraying Activities; Hazard: Contact with Chemicals; Existing Risk Control: PPE (Respirator).</li> <li>2. Onsite implementation for PPE contrary with PPE checklist report dated 7/2/2022 for harvesting operation. During the visit o Field P96P1, it was noticed the grabber driver was wearing safety shoe, but the safety shoe was badly damaged. Reference made to HIRARC for Harvesting reviewed on 15/12/2021. The operations using mechanical grabber stated existing control as to wear safety boot.</li> </ol>		



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<b>Corrections:</b>	<p>West Oil Mill Submitted the remaining worker to audiometric re-test on 11/2/2022.</p> <p>West Estate Immediately ceased the power spray operation on that day and briefed the respective sprayer on the usage of PPE. Warning letter were issued to the power spray gang and mandore on 11/2/2022.</p> <p>Immediately change the grabber driver safety shoe and briefed the tractor grabber on PPE replacement procedure.</p>
<b>Root Cause Analysis:</b>	Monitoring of Health and Safety Plan is inadequate due to lack of information shared amongst OSH Committee and hand over plan is not comprehensive
<b>Corrective Actions:</b>	<p>Information such as proper PPE usage, audiometric result and existing control will be shared amongst OSH Committee during OSH Meeting and to cascade down the information to their colleagues accordingly.</p> <p>Workplace inspection by Health &amp; Safety Committee and Site Safety and Sustainability Officer (SSSO) on quarterly basis.</p> <p>To review and strengthen PPE monitoring checklist by adding another level of monitoring i.e. field staff or assistant during operation at work place.</p>
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <ul style="list-style-type: none"> <li>i) Retest for audiometric testing was carried out on 11/2/2022 for 4 workers (STS affected workers) by audiologist. Report dated 11/2/22. Report was send by the audiologist (BP healthcare) on 18/2/22.</li> <li>ii) Warning letter dated 11/2/2022 was verified as to immediately ceased the power spray operation and the respective sprayers on the usage of PPE.</li> <li>iii) Required PPE given to the respective group of workers (power spray operation &amp; harvesting) to ensure complete PPE worn while doing work.</li> <li>iv) Information on the importance of PPE, audiometric result and existing control were shared amongst OSH Committee during OSH Meeting. 2nd meeting for 2022 was done on 21/4/2022 to discuss all pertinent elements on safety and health. Minute of meeting was made available for verification.</li> <li>v) Workplace inspections were carried on quarterly basis as part of safety inspection prior to safety meeting. Work place inspection records dated 23/2/2022 and 12/4/2022 were reviewed.</li> <li>vi) PPE monitoring conducted by field staff or assistant during operation at work place was done randomly. Inspection records for the month of April 2022 checked. Based on the records, PPE compliance has been effectively demonstrated.</li> </ul> <p>Implemented action found to be sufficient to close the major NC on 10/5/2022. Continuous implementation will be further verified in the next surveillance</p>

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Non-conformity			
<b>NCR Ref #</b>	2163206-202202-N1	<b>Date Issued</b>	11/2/2022
<b>Due Date</b>	10/2/2023	<b>Date of nonconformity Closure</b>	Open
<b>Clause &amp; Category (Critical / Minor)</b>	7.3.2 (minor)		
<b>Statement of Nonconformity:</b>	The implementation of disposal of used chemical container is ineffective.		
<b>Requirement Reference:</b>	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated		
<b>Objective Evidence:</b>	West Estate - During the site visit at P96A1 harvesting operations a harvester was found using an empty Ally container for storage of personnel belonging attached in the motorcycle basket.		
<b>Corrections:</b>	Refresher training has been conducted on 8th February 2022 to all workers during morning muster		
<b>Root Cause Analysis:</b>	Lack of worker awareness on the consequences of using chemical container		
<b>Corrective Actions:</b>	i) Refresher training will be conducted biannually by estate management ii) To include usage of used chemical container in Workplace inspection checklist		
<b>Assessment Conclusion:</b>	Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next surveillance assessment		

Non-conformity			
<b>NCR Ref #</b>	2163206-202202-N2	<b>Date Issued</b>	11/2/2022
<b>Due Date</b>	10/2/2023	<b>Date of nonconformity Closure</b>	Open
<b>Clause &amp; Category (Critical / Minor)</b>	2.2.2 (Minor)		
<b>Statement of Nonconformity:</b>	Legal due diligence of contracted third parties were not fully demonstrated.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	<p>During the visit to the FFB Contractor’s Workshop at West Estate, it was sighted that the management of the workshop does not meet the legal requirements as stated in the contract agreements.</p> <ol style="list-style-type: none"> <li>1. Schedule Waste materials such as spent chemical containers, spent batteries, spent lubricants, and spent lubricant drums were not disposed to licensed Scheduled Waste Manager.</li> <li>2. Unsatisfactory housekeeping of the site with scattered waste materials.</li> </ol>		

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	<ol style="list-style-type: none"> <li>3. The Workshop Attendant was not wearing appropriate PPE during work.</li> <li>4. Oxygen and Acetylene Tanks were not chained and not equipped with Flashback Arrestors to reduce risks of accidents and injuries.</li> <li>5. Lubricant Drums were seen transferred into unlabelled containers. Diesel Tank have been stationed at the workshop without proper safety compliances such as fire extinguishers, bunds to contain spillage and without Fire Department approval.</li> </ol>
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Consult FFB Contractor and issue a reminder letter as per issue raised.</li> <li>2. To educate contractor on Scheduled Waste Management and advise him to clean-up the area</li> <li>3. To advise contractor to provide appropriate PPE to his worker i.e. safety helmet.</li> <li>4. Advise contractor to install flashback arrestor to Oxygen and Acetylene tank and chain the tank when not is use</li> <li>5. To label the container and provide SDS accordingly</li> <li>6. To remove the diesel tank from the workshop since the main workshop is located at Jenjarum</li> </ol>
<b>Root Cause Analysis:</b>	Due diligence conducted does not covered contractor’s day to day operation
<b>Corrective Actions:</b>	<p>To acquire approval from estate management and local authority to station the skid tank at the area Workplace inspection by Health &amp; Safety Committee and SSSO on quarterly basis</p> <p>To give training to respective transporter on workshop management, scheduled waste and any legal compliance requirement by RSQM</p>
<b>Assessment Conclusion:</b>	Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next surveillance assessment

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	Good cooperation among the team.
PF 2	Good document retrieval.
PF 3	Positive feedbacks from interviewed external stakeholders.

**3.3.1 Status of Nonconformities Previously Identified and Observations**

Non-conformity			
<b>NCR Ref #</b>	2027103-202103-M1	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	2.1.1 (Critical)
<b>Date Issued</b>	01/03/2021	<b>Due Date</b>	30/05/2021
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/05/2021
<b>Statement of Nonconformity:</b>	The unit of certification did not comply with Employment Act 1955, 60 (3) (d), "In the case of an employee employed on piece rates who works on a rest day, he shall be paid twice his ordinary rate per piece."		
<b>Requirement Reference:</b>	The Unit of Certification complies with legal requirements.		
<b>Objective Evidence:</b>	Reviewed the Estate Daily Attendance Report for December 2020 found that one of the piece-rated workers who entitled rest day on Sunday (Employee No.: 100282) has worked on two Sunday on 20/12/2020 and 27/12/2020. However, cross checked with the payslip found that the worker has only been paid one day (20/12/2020) of work on rest day wages as per Employment Act 1955. The work done on 27/12/2020 was paid on normal wages as indicated 01* in the Estate Daily Attendance Report.		
<b>Corrections:</b>	Paid balance of pay to the respective worker on 3/3/2021		
<b>Root Cause Analysis:</b>	Confusion on the requirement in clause 60 (3) of Employment Act 1955 where a daily rated worker being offered a piece rated job and did not complete his task for the day.		
<b>Corrective Actions:</b>	Refresher training on MAPA/NUPW Collective Agreement especially on wages payment and to add another tier of data verification to minimise the error in data entry.		
<b>Assessment Conclusion:</b>	Based on document verification on the payslips at East Estate, no recurrence of issue sighted. Work on rest day was paid in accordance with clause 60 (3) of Employment Act 1955. Thus, the previous major NC is remain closed.		

Non-conformity			
<b>NCR Ref #</b>	1895185-202002-M1	<b>Date Issued</b>	23/6/2020
<b>Due Date</b>	20/9/2020	<b>Date of nonconformity Closure</b>	11/8/2020
<b>Clause &amp; Category (Critical / Minor)</b>	4.2.1 (Critical)		
<b>Statement of Nonconformity:</b>	The grievance process is not resolve in an effective, timely and appropriate manner.		
<b>Requirement Reference:</b>	The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants,		

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	HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.
<b>Objective Evidence:</b>	In West Estate, Air Hitam housing area was visited and it was found out that House number 12 has reported the issue of broken toilet since 28/02/2020 through WhatsApp but still no solution until to-date.
<b>Corrections:</b>	To request the respective worker to submit the complaint through form and management has immediately engaged a contractor to attend to the complaint as soon as MCO was lifted and replaced by RMCO which allow the visitor to enter the worker quarter compound.
<b>Root Cause Analysis:</b>	Cash control for non-essential work was imposed and limitation of activity to be conducted during MCO leads to delay in attending to the complaint reported.
<b>Corrective Actions:</b>	To plan a briefing session on grievance procedure to the worker and to display the flow chart of grievance procedure at the muster ground. Management will review complaint form/book received twice a month to ensure all complaint are being attended accordingly.
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <p>Corrective action plan taken was verified as per evidence submitted as following:</p> <ul style="list-style-type: none"> <li>- Contract form doc. # 4300507474; Date: 2/7/2020 for Contractor Tana Agro Enterprise for Housing Repair Works: Big Tank &amp; Small Tank repair, Clear Clog of Septic Tank, for house # 7-16, 12 &amp; 14, Block A A1 – A10</li> <li>- Evidence of housing photo: before, during &amp; after</li> <li>- Briefing of Grievance Procedure records (briefing report, procedure &amp; attendance) for West Estate workers dated 24/7/2020 by SAM Muhammad Faiz Ismail &amp; AM Ahmad Faisal Jusoh – earlier meeting conducted with RSQM dated on 23/7/2020</li> <li>- Evidence management review on complaint form from workers # 139400 dated 5/6/2020</li> </ul> <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 11/8/2020. Continuous implementation will be further verified in the next audit.</p> <p>ASA2_2 verification:</p> <p>Based on interview with workers (informal and formal) session at site, the were able to explain on the grievance process. In addition, a few other grievance/complaint channels such as "Suara Kami", ULULA and social dialogue were introduced. The implemented actions have been effectively demonstrated. Thus, the previous major NC is remained closed.</p>

Non-conformity			
<b>NCR Ref #</b>	1895185-202002-M2	<b>Date Issued</b>	23/6/2020
<b>Due Date</b>	20/9/2020	<b>Date of nonconformity Closure</b>	11/8/2020
<b>Clause &amp; Category (Critical / Minor)</b>	6.2.3 (Critical)		

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<b>Statement of Nonconformity:</b>	The compliance to some of labour requirements is not effectively implemented.
<b>Requirement Reference:</b>	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.
<b>Objective Evidence:</b>	<p>West Estate:</p> <p>During housing visit, it was found that 4 watchmen in Air Hitam Division has work more than 8 hours a day (7 am-7pm) but paid normal rate without overtime. It was sighted the works progress evidence in the 2019 replanting works WhatsApp group. The manager has informed that overtime has been replaced with allowance of RM650 through a voluntary basis. It was communicated through the Mesyuarat Bersama Watchman Malam Cost Saving Initiative Ladang West 01/02/2020. This is not in accordance with the Employment Contract signed between workers and management and MAPA Circular No.12/2019 dated 02/04/2019 effect from 01 January 2019.</p> <p>West POM:</p> <p>Shift allowance entitled for a mill operator (Employee ID # 114898) was wrongly paid for 12 days instead of actual 13 days in pay slip. This is cross-referenced to the punch card for March 2020.</p>
<b>Corrections:</b>	<p>West Estate :</p> <p>The management has discontinue the allowance as the work for the night watchman is no longer required due to no vandalism and cattle intrusion reported for the past 3 months</p> <p>West POM :</p> <p>To reimburse Roni's one day shift allowance in July 2020 pay and to include additional notes on shift time frame in Daily Input Form in order to facilitate PIC in providing the daily input.</p>
<b>Root Cause Analysis:</b>	<p>West Estate :</p> <p>The night watchman was engaged to safeguard the replanting area from vandalism and cattle intrusion at night and the management is not aware that the initiative recommended is not in accordance with MAPA circular.</p> <p>West POM :</p> <p>The current system to verify daily input form is inefficient</p>
<b>Corrective Actions:</b>	<p>West Estate :</p> <p>The management has discontinue the allowance as the work for the night watchman is no longer required due to no vandalism and cattle intrusion reported for the past 3 months</p> <p>West POM :</p> <p>To reimburse Roni's one day shift allowance in July 2020 pay and to include additional notes on shift time frame in Daily Input Form in order to facilitate PIC in providing the daily input.</p>

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<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <p>Corrective action plan taken was verified as per evidence submitted as following:</p> <ul style="list-style-type: none"> <li>- West Estate: Discontinuation of night watchman back to normal overtime work</li> <li>- West Estate: Pay slip for Month of June &amp; July 2020</li> <li>- West POM: Pay slip of July 2020 paid the reimbursement for non-paid allowance (1 day) RM3 (Adjustment of wages)</li> <li>- West Estate: Memo from SDP Upstream Malaysia on monetarise initiative</li> <li>- West POM: Check roll briefing to PIC dated on 7/8/2020 by QA to Check roll Clerk and Admin &amp; Account Officer (QA)</li> </ul> <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 11/8/2020. Continuous implementation will be further verified in the next audit.</p> <p>ASA2_2 verification:</p> <p>Based check roll records checked in 3 sample months [April 2021 (peak), January 2022 (low) and August 2021 (average/medium)], no repeated issues observed. Thus, the previous major NC is remained closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	1895185-202002-M3	<b>Date Issued</b>	23/6/2020
<b>Due Date</b>	20/9/2020	<b>Date of nonconformity Closure</b>	11/8/2020
<b>Clause &amp; Category (Critical / Minor)</b>	7.10.1 (critical)		
<b>Statement of Nonconformity:</b>	The data reported in the Palm GHG calculator was not consistent with the records on site.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	It was found that based on SAP system at West Estate the diesel consumption for 2019 189,735 lt. However, the data reported in Palm GHG calculator was 112,715 lt.		
<b>Corrections:</b>	To extract the correct data and e-mailed to auditor for verification		
<b>Root Cause Analysis:</b>	Wrong data extracted from the SAP system during the audit		
<b>Corrective Actions:</b>	To brief person in-charge at the operating unit on the extraction of data used in Palm GHG calculator		
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <p>Corrective action plan taken was verified as per evidence submitted as following:</p> <ul style="list-style-type: none"> <li>- Corrected data extracted re-emailed to auditor for verification dated on 7/7/2020</li> </ul> <p>Briefing of Palm GHG data entry to all relevant person in-charge dated on 25/6/2020. Evidence shown the CAP was found to be effective thus the major NC</p>		

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	<p>was closed on 11/8/2020. Continuous implementation will be further verified in the next audit.</p> <p>ASA2_2 verification: The recent GHG declaration for 2021 summary has been checked and verified. All data tallies with the input and official figures as shown in the official GHG website. Estate and mill personnel tediously checked prior to the declaration in the GHG website. As such the NCR raised is remained closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	1895185-202002-M4	<b>Date Issued</b>	23/6/2020
<b>Due Date</b>	20/9/2020	<b>Date of nonconformity Closure</b>	11/8/2020
<b>Clause &amp; Category (Critical / Minor)</b>	5.3.2 (Critical)		
<b>Statement of Nonconformity:</b>	The root-cause of the for the non-conformity raised from the internal audit was not identified.		
<b>Requirement Reference:</b>	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>- Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>- Effectively implements and maintains the standard requirements within its organisation.</li> </ul> <p>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 nonconformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</p>		
<b>Objective Evidence:</b>	There were 2 NC raised as a result of the internal audit conducted on 16-17/12/2019 and had been closed by the Lead Internal Auditor on 29/1/2020. The records of this activity were documented in the internal audit report. However, the root-cause for both non-conformities was not identified despite the template format has a provision for it to be filled in.		
<b>Corrections:</b>	To communicate with the management to complete the internal audit reply template thoroughly before verification.		
<b>Root Cause Analysis:</b>	The root-cause for the non-conformity has been identified verbally and not recorded in the internal audit reply due to wrong interpretation of the requirement		
<b>Corrective Actions:</b>	To ensure operating unit has complete template prepared during verification of internal audit finding by guiding them throughout the closing of NC process.		
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <p>Corrective action plan taken was verified as per evidence submitted as following:</p> <ul style="list-style-type: none"> <li>- West Estate: Discontinuation of night watchman back to normal overtime work</li> <li>- West Estate: Payslip for Month of June &amp; July 2020</li> </ul>		



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	<ul style="list-style-type: none"> <li>- West POM: Payslip of July 2020 paid the reimbursement for non-paid allowance (1 day) RM3 (Adjustment of wages)</li> <li>- West Estate: Discontinuation of night watchman back to normal overtime work</li> <li>- West Estate: Payslip for Month of June &amp; July 2020</li> </ul> <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 11/8/2020. Continuous implementation will be further verified in the next audit.</p> <p>ASA2_2 verification: Verified the Internal Audit for West POM dated 09/12/2021. There were 1 major non-conformity raised during the audit. The mill has documented the root cause for the raised non-conformity together with the corrective action plan as required. All required statements have been clearly specified, documented and available for verification. Therefore, the critical NCR remains closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	1895185-202002-M5	<b>Date Issued</b>	23/6/2020
<b>Due Date</b>	20/9/2020	<b>Date of nonconformity Closure</b>	11/8/2020
<b>Clause &amp; Category (Critical / Minor)</b>	Critical (7.6.3)		
<b>Statement of Nonconformity:</b>	PPE was not use appropriately by workers to cover potentially hazardous operations.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	<p>West Estate:</p> <ul style="list-style-type: none"> <li>- During visit to West Estate Chemical &amp; Fertilizer Store, it was found that the store operator worn a respirator (Model # 2311K-5S) with a torn filter cartridge.</li> <li>- During visit to West Estate field block 06C for harvesting operation activity sampling, it was sighted at the nearby area where there were workers loading/arranging FFB manually into the bin with a worker not wearing proper PPE by wearing motorcycle helmet and standing on motorcycle seat while help loading the FFB into the bin</li> </ul> <p>West POM: During visit for West Palm Oil Mill Workshop, it was found that the fitter use the oxy acetylene cutter without proper PPE and the oxy cylinder been used without flashback arrestor.</p>		
<b>Corrections:</b>	West Estate : To brief and give warning to worker without proper PPE while in operation		

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	<p>West POM :</p> <p>To issue warning letter to worker without proper PPE while in operation and install flashback arrestor to the oxy cylinder</p>
<b>Root Cause Analysis:</b>	<p>West Estate :</p> <p>Insufficient monitoring and awareness on the importance of PPE usage</p> <p>West POM :</p> <p>Poor safety awareness amongst worker and management Insufficient monitoring PPE usage during operation</p>
<b>Corrective Actions:</b>	<p>West Estate :</p> <p>Management to monitor PPE issuance book on monthly basis and daily check for PPE usage from time to time</p> <p>West POM :</p> <p>Training and campaign on safety awareness. Region SQM to conduct workplace inspection on quarterly basis</p>
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <p>Corrective action plan taken was verified as per evidence submitted as following:</p> <ul style="list-style-type: none"> <li>- West Estate: Warning letter to respective workers dated on 19/3/2020</li> <li>- West POM: Warning letter to respective workers dated on 10/7/2020</li> <li>- SOU 9 safety awareness townhall program dated on 10/8/2020</li> <li>- West Estate: PPE monitoring record during daily muster</li> <li>- West POM: Workplace inspection record conducted by RSQM on 24/7/2020</li> </ul> <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 11/8/2020.</p> <p>ASA2_2 verification:</p> <p>Verified that 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, Harvesting Gang and Manuring Gang and visit to the stores of the estate and mill, it was sighted that all required appropriate PPEs were worn by the personals. Therefore, the corrective action is deemed to be effective to address the raised non-conformity. Hence the Critical Non-Conformity is remained closed.</p>

<b>Non-conformity</b>			
<b>NCR Ref #</b>	1895185-202002-M6	<b>Date Issued</b>	23/6/2020
<b>Due Date</b>	20/9/2020	<b>Date of nonconformity Closure</b>	11/8/2020
<b>Clause &amp; Category (Critical / Minor)</b>	3.6.1 (critical)		

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<b>Statement of Nonconformity:</b>	Mitigation plans and procedures documented and implemented for some operations where the risk assessment to identify its H&S issues were found insufficient
<b>Requirement Reference:</b>	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.
<b>Objective Evidence:</b>	<p>Mitigation plans and procedures documented and implemented for some operations where the risk assessment to identify its H&amp;S issues were found insufficient for the following:</p> <p>West Estate: It was sighted during visit to field and chemical store that there were workers loading/arranging FFB manually into the bin. Based on HIRARC register latest review dated 2/1/2020, mitigations plan established and recorded shown existing control identified only for Loading Loose Fruit and Loading FFB by Infield Machine activities which were similar but Manual Loading/Arranging of FFB into the bin not fully identified and assessed in HIRARC register.</p> <p>West POM: It was found that the condensate pit operation within oil room and sterilizer operation. Based on HIRARC register latest review dated 6/4/2020, mitigations plan established and recorded shown existing control identified for oil room operation included with barricade gate installation for sludge pit which is similar but risk and hazard for condensate pit in oil room and sterilizer operation not fully identified and assessed in HIRARC register. It was found that there is manual nut cracking by lab operator for nut &amp; kernel histogram analysis. The potential risk and hazard of the activity not fully identified and assessed its H&amp;S issues in HIRARC register.</p>
<b>Corrections:</b>	<p>West Estate :</p> <p>To identify and conduct risk assessment as well as update the SOP to include manual loading FFB into bin if the machine breakdown</p> <p>West POM :</p> <p>To put signage at modification area and the handrail will be fix to the site once the work is completed. To review risk assessment for lab operation</p>
<b>Root Cause Analysis:</b>	<p>West Estate :</p> <p>HIRARC was not access for alternative activity when the machine breakdown</p> <p>West POM :</p> <p>HIRARC assessment mechanism at WPOM is inadequate as the assessment is not been conducted thoroughly including maintenance work.</p>
<b>Corrective Actions:</b>	<p>West Estate:</p> <p>To brief to the respective worker on the updated SOP and HIRARC.</p>

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	<p>West POM :</p> <p>To schedule a training on HIRARC procedure and conduct workplace inspection on quarterly basis by RSQM</p>
<b>Assessment Conclusion:</b>	<p>Corrective action plan taken was verified as per evidence submitted as following:</p> <ul style="list-style-type: none"> <li>- West Estate: HIRARC on manual FFB loading dated 21/3/2020 with established control of Training and PPE use</li> <li>- West Estate: HIRARC briefing to workers by SAM Muhamad Faiz dated on 21/3/2020</li> <li>- West POM: HIRARC on condensate pit operation and nut histogram activity dated on 2/7/2020 with established control of Training and PPE use</li> <li>- West POM: HIRARC briefing to workers and workplace inspection by RSQM dated on 2/7/2020</li> </ul> <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 11/8/2020.</p> <p>ASA2_2 verification:</p> <p>HIRARC has been established for all risks and hazards that have been identified in the estate and the mill. The HIRARC is reviewed on an annual basis and as and when there are any accidents or incidents that occur. Regular trainings are conducted based on the HIRARC to all related personals in the estate and the mill. Verified against all related incidents and accidents in the mill and estate, the operating unit have appropriate risks and mitigation methods identified in the HIRARC. Therefore, the corrective action is deemed to be effective to address the raised non-conformity. Hence the Critical Non-Conformity is remained closed.</p>

<b>Non-conformity</b>			
<b>NCR Ref #</b>	1895185-202002-N1	<b>Date Issued</b>	23/6/2020
<b>Due Date</b>	11/2/2022	<b>Date of nonconformity Closure</b>	11/2/2022
<b>Clause &amp; Category (Critical / Minor)</b>	4.2.3 (minor)		
<b>Statement of Nonconformity:</b>	The complainant was not informed of the complaint progress, including against agreed timeframe and the outcome.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	<p>West Estate:</p> <p>The complainant will fill in the complaint form and staff will summarize the issue in Rekod Aduan Kerosakan Rumah. The record captured the complainant issue; house no, complainant date, action taken date, contractor, staff and executive house. However, there is no evidence of West Estate keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome.</p>		

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<b>Corrections:</b>	Informed the complainant on the status of complaint, action to be taken and a time frame to complete the job. The complainant will need to acknowledge and update in Rekod Aduan Kerosakan Rumah accordingly
<b>Root Cause Analysis:</b>	The grievance procedure has not been communicated effectively between worker and management
<b>Corrective Actions:</b>	To plan a briefing session on grievance procedure to the worker and staff and display the flow chart of grievance procedure at the muster ground and division office. Management will review complaint form/book received twice a month to ensure all complaint are being attended accordingly.
<b>Assessment Conclusion:</b>	A new house repair reporting system called OPP @ OilPalmPal using QR code was introduced. The system was designed to monitor house repair request, progress of work and categorized by criticality of repair required. As of 3/2/2022, total of 50 repairs reported (6/12/21 to 3/2/22), 22 completed and 28 is still in progress. 18 out of 28 repairs requiring external contractors. Pending works will be automatically triggered and reported to zone level. The implemented actions have been effectively demonstrated Thus, the previous minor NC is closed effectively on 11/2/2022. Continuous implementation will be further verified in the next assessment.

Non-conformity			
<b>NCR Ref #</b>	1895185-202002-N2	<b>Date Issued</b>	23/6/2020
<b>Due Date</b>	11/2/2022	<b>Date of nonconformity Closure</b>	11/2/2022
<b>Clause &amp; Category (Critical / Minor)</b>	6.2.4 (Minor)		
<b>Statement of Nonconformity:</b>	The sanitation for housing condition sighted during site visit is not reflective as per reported in the housing inspection record.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	<p>During the housing inspection, it was observed that in housing area (Air Hitam Division) is not in favourable sanitation condition as reflected in the line site inspection.</p> <p>Sampled seen as below:</p> <ol style="list-style-type: none"> <li>1. House no 12: Broken Toilet, algae at the outside toilet wall and petrol storage at home.</li> <li>2. House no 45: Blocked drainage, used lubricant oil near dustbin, rubbish scattered in housing compound, and petrol storage at home.</li> </ol> <p>Trace of old burning for domestic waste.</p>		
<b>Corrections:</b>	To give notice to clean the house area for the poor housekeeping quarter and		

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	<p>informed the workers the Do and Don't at the housing area.</p> <p>Management has taken all the necessary action to fixed the toilet and clean the compound.</p>
<b>Root Cause Analysis:</b>	Insufficient monitoring by management to ensure cleanliness at worker quarter area
<b>Corrective Actions:</b>	<p>The management will enforce on maintaining good sanitation at worker quarter by giving continuous awareness talk on good housekeeping during muster and counselling to the problematic house individually.</p> <p>During linesite inspection, MA will put a remark should there is any issue arise on poor housekeeping, simecard will be issued and the respective worker will be consulted by Assistant In-Charge immediately.</p>
<b>Assessment Conclusion:</b>	<p>Based on PIOA @ housing inspection checklist, it was found that issues reported and site condition were consistent and being properly handled. A new house repair reporting system called OPP @ OilPalmPal using QR code was introduced. The system was designed to monitor house repair request, progress of work and categorized by criticality of repair required. As of 3/2/2022, total of 50 repairs reported (6/12/21 to 3/2/22), 22 completed and 28 is still in progress. 18 out of 28 repairs requiring external contractors. Pending works will be automatically triggered and reported to zone level. The implemented actions have been effectively demonstrated Thus, the previous minor NC is closed effectively on 11/2/2022. Continuous implementation will be further verified in the next assessment.</p>

<b>Non-conformity</b>			
<b>NCR Ref #</b>	1895185-202002-N3	<b>Date Issued</b>	23/6/2020
<b>Due Date</b>	11/2/2022	<b>Date of nonconformity Closure</b>	11/2/2022
<b>Clause &amp; Category (Critical / Minor)</b>	4.2.2 (Minor)		
<b>Statement of Nonconformity:</b>	The grievance procedure (Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues) is not well understood by the workers in West POM.		
<b>Requirement Reference:</b>	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.		
<b>Objective Evidence:</b>	8/8 workers interview during site visit didn't aware of the grievance & complaint book usage. They have understood that the complaint box located near the guard at West POM is used for housing repairs complaint only.		
<b>Corrections:</b>	To brief and display simplified grievance flow chart and procedure at operation area		
<b>Root Cause Analysis:</b>	Insufficient information shared during briefing/communication with worker leads to misunderstanding amongst workers on the complaint term where the complaint is only meant for housing.		

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<b>Corrective Actions:</b>	RSQM will schedule a training on grievance procedure for person in-charge in handling complaint and grievances
<b>Assessment Conclusion:</b>	Based on interview with workers (informal and formal) session at site, they were able to explain on the grievance process. In addition, a few other grievance/complaint channels such as "Suara Kami", ULULA and social dialogue were introduced. The implemented actions have been effectively demonstrated. Thus, the previous minor NC is closed effectively on 11/2/2022. Continuous implementation will be further verified in the next assessment.

Non-conformity			
<b>NCR Ref #</b>	1895185-202002-N4	<b>Date Issued</b>	23/6/2020
<b>Due Date</b>	11/2/2022	<b>Date of nonconformity Closure</b>	11/2/2022
<b>Clause &amp; Category (Critical / Minor)</b>	3.3.3		
<b>Statement of Nonconformity:</b>	The was no evidence to show that action have been taken to address the issue of under-ripe FFB harvested.		
<b>Requirement Reference:</b>	Records of monitoring and any actions taken are maintained and available.		
<b>Objective Evidence:</b>	Based on Ripeness Check Form (sampled: #8689, 8690, 8691, 8692, 8685, 8686 for month of November 2019), it was reported that in form #8689, there were 49 under-ripe FFB out 50 FFB harvested. This is not consistent with Sime Darby's ARM which threshold is <5%. However, there was no evidence that action have been taken to address the issue.		
<b>Corrections:</b>	Management issue a letter of 'akujanji' to the respective cutter and refresher training was done to highlight on under ripe issue. Currently estate practise MRS 5 during harvesting operation.		
<b>Root Cause Analysis:</b>	Due to the cropping pattern during low crop, harvesters' tendency to harvest underripe bunches to increase productivity. Estate Management are meeting the Harvesters every morning during the Daily Muster at 6.30 am. This meeting is basically verbal communication to all the workers on the matters arising such as unripe issue etc and solution for them to follow. The communication and verbal training was not recorded except for the attendance of the Harvesters since this is the daily routine.		
<b>Corrective Actions:</b>	To conduct SOP training and coaching to the worker from time to time and ensure any action taken is recorded.		
<b>Assessment Conclusion:</b>	The estate conveyed communication daily during the morning muster and emphasized on the crop quality and safety etc mainly for the harvesters. Sighted records of briefing in Dec/Nov 2021 selectively. Daily monitoring/inspection being at the field. Habitual non-compliance being disciplined including reminders/warning letters. Interview with the harvesters in the field P96A1 on 07/2/2022 confirmed the practice and system being implemented accordingly. Thus, the previous minor NC is closed effectively on 11/2/2022. Continuous implementation will be further verified in the next assessment.		

Opportunity for Improvement	
OFI#	Description
OFI 1	<p><b>OFI Statement:</b>  Indicator 6.2.4 – Weekly housing inspection checklist records shown repeated issue of noncompliance related to presence of animals (stray dogs and chicken) and conditions of perimeter drain within housing area</p> <p><b>Verification / Follow-up actions:</b>  Based on PIOA checklist and site visit, no presence of animals (stray dogs and chicken) observed which impacting the cleanliness of the housing compound. Conditions of parameter drain has been improved with the progressive maintenance programme and repair work done by the estate/mill. As such both the OFI raised is closed and concluded.</p>
OFI 2	<p><b>OFI Statement:</b>  Indicator 3.2.1</p> <ul style="list-style-type: none"> <li>- The design of 3 units of oil trap at West Estate (Air Hitam Division) can be further improved so that they can trap oil that accidently spilled into the drains more efficiently.</li> <li>- Information on the assessment of aspects and impacts of the use of used tyre for bunding support could be improved further</li> </ul> <p><b>Verification / Follow-up actions:</b></p> <ul style="list-style-type: none"> <li>- The estate management has made temporary oil trap at the outlet leading to the external drain. There will be a workshop upgrading to be initiated in Sept 2022 at RM500K. Inclusive will be a new design design ref no LCRE/C18/OT-01 Engineering Dept 2018 for the oil trap upgrading construction. The document was sighted and verified.</li> <li>- Assessment of aspects and impacts of the use of used tyre for bunding support has been revised and enhanced as per document "Bund Maintenance" dated 13/01/2022 approved by the Manager. During the site visit there were NIL practice being made in West Estate at current. As such both the OFI raised is closed and concluded.</li> </ul>
OFI 3	<p><b>OFI Statement:</b>  Indicator 7.3.2 – The awareness with regards to wastes disposal amongst the workers can be improved as some empty motor oil containers found in the field and less utilization of recycle waste containers.</p> <p><b>Verification / Follow-up actions:</b>  Field visit and housing areas confirmed no observation of waste including empty motor oil containers. Waste are disposed and per the guidelines provided in the SOP. Interview with the workers in the field confirmed that they understood and were guided on the requirement. As such the OFI raised is closed and concluded.</p>
OFI 4	<p><b>OFI Statement:</b>  Indicator 6.7.3</p> <p>During visit to West Estate field block 06C for harvesting operation activity sampling, the workers' claimed that they were buying their own safety shoe despite records of PPE issuance shown PPE been issued by estate to the workers. The understanding of workers claiming to buy the safety shoe on their own could lead to discrepancy in PPE issuance responsibility by employer and need to be improved.</p> <p>During visit to West Estate field block 12A for mechanized P&amp;D spraying (Arbus Spray) operation, it was sighted that the PPE worn by operator was different by normal (backpack sprayer) PPE. It would</p>



	<p>be better if the PPE worn by the Arbus Spray operator to be specified as other Pictorial Safety Standard (PSS).</p> <p><b>Verification / Follow-up actions:</b></p> <ol style="list-style-type: none"> <li>1. Based on the interview with the mill and estate workers, it was identified that all PPE's are provided free of charge and workers do not purchase them by themselves. The workers also are aware that they are entitled to quality and appropriate PPE by the management. Verified the PPE Issuance Records available for both mill and estate indicating all PPEs are provided by the management.</li> <li>2. Identified during the visit to the operations and stores at the estate and mill that all PPE worn were in accordance with Pictorial Safety Standards (PSS).</li> </ol> <p>As such both the OFI raised is closed and concluded.</p>
<p><b>OFI 5</b></p>	<p><b>OFI Statement:</b></p> <p>Indicator 3.6.1          West Estate:          Information on the mitigation plans of chemical mixing for Arbus Spray Tractor tanks activities could be further improved its identification and assessment in HIRARC register.</p> <p>West POM:          It was found that there is use of solvent (Iso-propyl Alcohol - IPA) for FFA determination analysis. SDS for IPA records shown sampling analysis using IPA need to be done in fume hood whilst the CHRA report (CHRA Report Sime Darby Plantations Sdn. Bhd. KKS West, Carey Island, Selangor (SLK 1710); Prepared by The Teong Beng; DOSJH Registration Reference # JKPP HIE 127/171-2(166); Assessment date: 14/5/2015; Report date: 29/7/2015) indicated that sampling analysis using IPA can be done in General Ventilation area only. Information consistency on the mitigation plans of this activity could be further improved its identification and assessment in HIRARC register.</p> <p><b>Verification / Follow-up actions:</b></p> <ol style="list-style-type: none"> <li>1. Arbus Spray Tractor were no longer in operations in the estate. A similar operation name Power Spray was in operation and verified its HIRARC to include all possible hazards in the estate including chemical mixing and many more.</li> <li>2. HIRARC Register for the use of solvent (Iso-propyl Alcohol - IPA) for FFA determination analysis were available for verification. The mitigation plans of this activity stated the need to be done in fume hood as stated in the SDS as well. Interview with the workers involved indicated there were aware of the requirement to use the fume hood during the operation.</li> </ol> <p>As such both the OFI raised is closed and concluded.</p>
<p><b>OFI 6</b></p>	<p><b>OFI Statement:</b></p> <p>Indicator 6.2.2          Based on consultation with internal stakeholders among workers, the understanding and awareness on information stated in their payslips found to be deficient. Hence, the implementation of programs to increase workers' understanding on information in their payslips as identified in the SIA Management Plan could be improved further for West POM workers.</p> <p><b>Verification / Follow-up actions:</b></p> <p>Based on various consultations (informal and formal) at site, the understanding of information in the payslip has been improved. They can explained on each details as for now payslips is written in their native language. As such the OFI raised is closed and concluded.</p>

**3.3.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1895185-202002-M1	Critical	4.2.1	23/6/2020	Closed out on 11/8/2020
1895185-202002-M2	Critical	6.2.3	23/6/2020	Closed out on 11/8/2020
1895185-202002-M3	Critical	7.10.1	23/6/2020	Closed out on 11/8/2020
1895185-202002-M4	Critical	5.3.2	23/6/2020	Closed out on 11/8/2020
1895185-202002-M5	Critical	6.7.3	23/6/2020	Closed out on 11/8/2020
1895185-202002-M6	Critical	3.6.1	23/6/2020	Closed out on 11/8/2020
1895185-202002-N1	Minor	4.2.3	23/6/2020	Closed out on 11/2/2022
1895185-202002-N2	Minor	6.2.4	23/6/2020	Closed out on 11/2/2022
1895185-202002-N3	Minor	4.2.2	23/6/2020	Closed out on 11/2/2022
1895185-202002-N4	Minor	3.3.3	23/6/2020	Closed out on 11/2/2022
2027103-202103-M1	Critical	2.1.1	01/03/2021	Closed out on 05/05/2021
2163206-202202-M1	Critical	3.4.3	11/2/2022	Closed out on 10/05/2022
2163206-202202-M2	Critical	7.8.2	11/2/2022	Closed out on 10/05/2022
2163206-202202-M3	Critical	3.6.2	11/2/2022	Closed out on 10/05/2022
2163206-202202-N1	Minor	7.3.2	11/2/2022	Open
2163206-202202-N2	Minor	2.2.2	11/2/2022	Open

**3.4 Stakeholders and previous land owner / user consultation**

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss SOU 9 West 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.

<b>Stakeholders contacted</b>		
<b>Type of Stakeholder</b> (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	<b>Stakeholder name / organization</b>	<b>Means of communication</b> (e.g. face to face interview, email, phone interview, comment from public notice)
Internal Stakeholder	Site NUPW representative, foreign workers representative, gender committee representative	Face to Face
External Stakeholder	Kedai Runcit Raja	Face to Face
Governmental Department – School	SMK Pulau Carey	Face to Face
Contractor	Lotus Two Enterprise, DNRJ, Chip Huat Excavator	Face to Face
Communities	Chairman of JPKKOA	Face to Face
Union (external)	NUPW Selangor State Secretaty	Face to Face

<b>Stakeholders comment</b>	
<b>1</b>	<p><b>Feedbacks:</b> Sundry shop – Frequent price monitoring was done by the management to check if there is any price hike to ensure affordable price of goods to all workers.</p> <p><b>Audit Team verification and response:</b> No further issue</p>
<b>2</b>	<p><b>Feedbacks:</b> NUPW Representatives – They informed that no pending issue at the time of audit. They will discuss with the management if there is any issue reported</p> <p><b>Audit Team verification and response:</b> No further issue.</p>
<b>3</b>	<p><b>Feedbacks:</b> Gender Committee Representatives &amp; female workers – They informed that there was one (1) sexual harassment and violence case reported since last audit. The case was properly investigated and handled through domestic inquiry (DI). Based on interview, the female workers understand the function of Gender committee and aware of the complaint mechanism if there is any issues. They were treated equally without any discrimination by the management.</p> <p><b>Audit Team verification and response:</b> The management will respect the rights of female employees and keep monitoring if there is any case of sexual harassment and violence happen. No further issue.</p>
<b>4</b>	<p><b>Feedbacks:</b> Foreign workers representative – Their wages are paid according to Minimum Wage Order 2020 and overtime was offered to them on voluntary basis. Other terms of employment were clearly understood by them. The new house repair request using OPP @ OilPalmPal is very effective by using QR code. They can always highlight any issues during Social Dialogue sessions.</p> <p><b>Audit Team verification and response:</b> Positive comments highlighted by worker’s representative. No further comment.</p>
<b>5</b>	<p><b>Feedbacks:</b> Contractor – Any project/task/job offered by Sime Darby Plantation is based on long term or short-term contract. For one off job, either local work order or purchase order will be issued to the supplier or vendor. No pending @ outstanding payment so far and payment was promptly done in timely manner. As for hiring of foreign workers, Sime Darby Plantation has not allowed any foreign workers without a valid VISA/permit @ PLKS entering their premise.</p> <p><b>Audit Team verification and response:</b> No negative comments raised by contractors and continue to follow rules and regulations set by Sime Darby Plantation.</p>

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<b>6</b>	<p><b>Feedbacks:</b> Head Master, SMK Pulau Carey – Good cooperation given to the school in terms of monetary contribution and also manpower assistance. Estate will try to assist in their capacity for any written request from school.</p> <p><b>Audit Team verification and response:</b> No further issue.</p>
<b>7</b>	<p><b>Feedbacks:</b> NUPW, Selangor State Secretary - No reported case under Sime Darby Plantation for both (West Estate and POM) so far. As for Selangor, municipal council areas under Kuala Langat, Kuala Selangor and Hulu Selangor has to follow the rate of RM 46.15 per day or RM1,200 per month effective from 1/2/2022. This is based on latest MAPA Circular no. 7/22 dated 22/1/22. Based on feedback from NUPW representative at site, Sime Darby Plantation has acknowledged this circular and will apply starting from February 2022 salary payment.</p> <p><b>Audit Team verification and response:</b> No further issue.</p>
<b>8</b>	<p><b>Feedbacks:</b> Chairman of JPKKOA – Sime Darby Plantation has always assist and cooperate from time to time with “Orang Asli” communities within Carey Island. For example in the recent flood, a lot of contributions such as food and hygiene kits were given to the flood victims.</p> <p><b>Audit Team verification and response:</b> No further issue.</p>

<b>List of land owner / user contacted</b>					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
West POM Certification Unit have already gone through 2 <sup>nd</sup> Cycle of Replanting therefore this is not applicable.					

<b>Previous land owner / user comment</b>	
<b>NA</b>	<p><b>Feedbacks:</b> -</p> <p><b>Audit Team verification and response:</b> -</p>


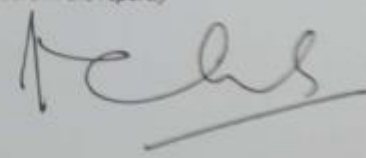
### 3.5 Impartiality and conflict of interest

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

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**Formal Signing-off of Assessment Conclusion and Recommendation**

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Strategic Operating Unit (SOU 9) – West Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Strategic Operating Unit (SOU 9) – West Palm Oil Mill is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Bin Zainal Abidin	Name: Md Rapit Bin Suman
Company Name: BSI Services (M) Sdn Bhd	Company Name: West Estate
Title: Lead Auditor	Title: SOU 9 chairman
Signature: 	Signature: (I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.) 
Date: 25 <sup>th</sup> July 2022	Date: 25 <sup>th</sup> July 2022

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1:</b> 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><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB continued to use the internet to disseminate public information management documents such as land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans. All operating units have individual documents and records to demonstrate compliance to this indicator.</p> <p>a) The website address is <a href="http://www.simedarbyplantation.com/">http://www.simedarbyplantation.com/</a>.</p> <p>b) Information relating to social program on education, environment, community and health, etc, Yayasan Sime Darby as the Foundation has expanded its wings from offering scholarships to outstanding and deserving individuals to funding impactful conservation, outreach and development programmes.</p> <p>c) The SDPB website address <a href="http://www.yayasansimedarby.com/">http://www.yayasansimedarby.com/</a>.</p> <p>d) Figures of gender distribution within all workers categorized by management, administrative staff and workers (both permanent casual workers, piece rate workers) were made available at estate and mill office with record titled 'SEMUA – EMPLOYEE MASTER LISTING'.</p>	Complied

1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>SDPB continued to use the internet to disseminate public information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances. The SDPSB website address is available in English at <a href="http://www.simedarbyplantation.com/">http://www.simedarbyplantation.com/</a>.</p>	Complied
1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Request by stakeholders conducted through stakeholders meeting, visitor books, letter and forms. The operating units maintain records of all request and response. Annual face to face session with stakeholder was carried out on 11/11/21 for SOU9. Issues requested and discussed during meeting with the stakeholders as the following:</p> <p><u>West Estate</u></p> <ul style="list-style-type: none"> <li>i) SMK Pulau Carey – Request to use estate’s facilities for school programme. To repair damaged fence at school backyard.</li> <li>ii) Action: Estate team will assist and accommodate the request. Pruning will be done first to clear the snapped fronds.</li> <li>iii) SJK (T) Ladang Barat – To desilt and clean the drain near to estate boundary. Action: Will further investigate the cause of drain blockage and mitigate the flooding issue.</li> <li>iv) JKK Kg Sg Kurau – Request to expedite road repair. Culvert repair and modification work has caused difficulties of road users. Longer time taken from normal 45 minutes to 1-hour journey. Action: Immediate action will be done to rectify the issue.</li> <li>v) Kampung Sg Judah – Request to bury and close the drain adjacent to estate boundary to built carpark. Action: Survey will be done first for suitability of the carpark location before building the new one.</li> </ul> <p><u>West POM</u></p>	Complied

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		<p>DOE (field citation report, 8/2/2022) – Required to submit Environmental Audit Report (approval condition no. 22). To submit feedback by 22/2/22. Action:</p> <p>DOSH (logbook), 1/9/2021: Enforcement on "Akta Pencegahan &amp; Pengawalan Penyakit Berjangkit 1988 (Akta 342)"</p> <ul style="list-style-type: none"> <li>- Compliance with current SOP, 60% workforce</li> <li>- QR code for "MySejahtera" and logbook availability</li> <li>- Temperature screening facility at the entrance</li> <li>- Social distancing marking in the office</li> <li>- Face mask to be provided to workers</li> </ul>											
1.1.4	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.</p>	Complied										
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>Both the estate and the mill continued to maintain the stakeholders information (address, contact number, nominated representatives) which included the contractors, vendors/suppliers, foreign recruitment agencies, embassy, government agencies, schools, local communities, CPO/PK customers, etc. The list of stakeholders has been established by the mill. The list was updated on 31/01/22 comprises of various parties, neighbouring communities and Government Agencies..</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Classification</th> <th colspan="2">No of stakeholder</th> </tr> <tr> <th>Estate</th> <th>Mill</th> </tr> </thead> <tbody> <tr> <td></td> <td>Government Agencies</td> <td>19</td> <td>16</td> </tr> </tbody> </table>		Classification	No of stakeholder		Estate	Mill		Government Agencies	19	16	Complied
	Classification	No of stakeholder											
		Estate	Mill										
	Government Agencies	19	16										



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		<table border="1" data-bbox="1160 363 1803 625"> <tr> <td>1</td> <td>- MPOB/KPDNKK/ - PDRM/Immigration</td> <td></td> <td></td> </tr> <tr> <td>2</td> <td>Local Community</td> <td>8</td> <td>10</td> </tr> <tr> <td>3</td> <td>Suppliers/Vendor</td> <td>21</td> <td>-</td> </tr> <tr> <td>4</td> <td>Contractors</td> <td>10</td> <td>44</td> </tr> <tr> <td></td> <td>Total</td> <td>58</td> <td>70</td> </tr> </table> <p data-bbox="1137 678 1930 770">The subjects discussed during the meeting held on 11/11/2021 and 05/02/2020 with the presence including stakeholders among others discussed on the following subjects;</p> <ul style="list-style-type: none"> <li>a) FFB OER award by the Mill             <ul style="list-style-type: none"> <li>- Prices subject to commodities pricing</li> <li>- Extraction ratios</li> <li>- FFB quality</li> </ul> </li> <li>b) Company Policies and SOP</li> <li>c) Issues relating to neighborhood and concerns</li> <li>d) Fire prevention</li> </ul> <p data-bbox="1137 1066 1930 1125">There is no major course of concern of issues highlighted during the meeting</p>	1	- MPOB/KPDNKK/ - PDRM/Immigration			2	Local Community	8	10	3	Suppliers/Vendor	21	-	4	Contractors	10	44		Total	58	70	
1	- MPOB/KPDNKK/ - PDRM/Immigration																						
2	Local Community	8	10																				
3	Suppliers/Vendor	21	-																				
4	Contractors	10	44																				
	Total	58	70																				
<b>Criterion 1.2:</b> 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 -	Sime Darby Plantation Berhad has implemented Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The policy was developed in Bahasa Malaysia and English.	Complied																				

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		- The latest Group Sustainability & Quality Policy Statement also includes the clause 'promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC) signed by Group Managing Director on 02/12/2019. The policy has been briefed to the workers during morning briefing. Besides, policies were briefed to stakeholders during the stakeholder meeting. The latest stakeholder meeting was carried out on 11/11/21.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Sime Darby Plantation has established the Vendor Integrity Pledge and Vendor COBC as a due diligence for external parties engaged by Operating Units. Sighted sampled as below: i. ATT Trading (SA0034902-T) ii. Bumi Sejahtera (M) Sdn Bhd (677582-M) iii. Chip Huat Excavator Works (001033695-X) iv. Tiong Ying Enterprise Sdn Bhd (684488-K) v. YGNT Enterprise (001501599-X)	Complied
<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<b>(C)</b> The Unit of Certification complies with legal requirements - Critical (Major) compliance -	West Certification Unit continued to comply with all related and applicable legal requirements. Sampled the license and permits as below during the assessment. <u>West POM</u> 1. Fire Certificate; Serial Number: 330910; Certificate Number: JBPM:SL-7/1084/2021; License valid from 16/08/2021 till 15/08/2022.	Complied

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		<p>2. Energy Commission License (Private Installation); Installation Number: ST(TKL)P/S/SGR/01648; Serial Number: 003595/2021; License Valid for 1 Year from 20/06/2021.</p> <p>3. MPOB License: License Number: 533238004000; Processing Capacity: 240,000 Mt FFB/year; License validity period: 01/10/2021 till 30/09/2021.</p> <p>4. DOE License; License Number: 003180; License valid from 01/07/2021 till 30/06/2022</p> <p><u>West Estate</u></p> <p>1. MPOB License; License Number: 522968002000; License Validity Period: 01/09/2021 – 31/08/2022. Estate Area: 5833.96 Ha.</p> <p>Permit Barang Kawalan Berjadual; Reference Number: B.PGK.SEL/5857; P Series Number: B00597; Storage Capacity (Diesel – 20,000 Litres &amp; Petrol – 10,000 Litres); License Validity Period: 04/04/2021 – 03/04/2022.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>As per records of Sime Darby Plantation Berhad Estate/Mill – Upstream Malaysia Legal &amp; Other Requirements Register (LORR) by Group Sustainability &amp; Quality Management; Updated 05/08/2021 (West Estate); 05/01/2022 (West POM). Sighted latest inclusion as follows:</p> <ul style="list-style-type: none"> <li>- Workers Minimum Standards of Housing and Amenities (Amendment) Act 2019.</li> <li>- Code of Practise for Safe Working in a Confined Space, 2010</li> <li>- Pesticides (Amendment of First Schedule) Order 2019.</li> <li>- Perintah Kawalan Pergerakan 2020.</li> <li>- Whistleblower Protection Act 2010</li> </ul>	Complied

		Malaysian Anti-Corruption Commission Act (amended) 2018	
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>Based on site visit at boundary, methods used are security trenching, PVC pegs (coloured with red and white) roads and fences. The demarcations were visibly maintained as below.</p> <p>1. West POM is located within the West Estate’s premises. The boundary of the mill compound is fenced.</p> <p>West Estate boundary at P09G with Kampung Orang Asli Sungai Judah and Field P17A with East Estate were visited, well maintained with trenches and field drains.</p>	Complied
<b>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</b>			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>A list of contracted parties maintained by all operating units within SOU 9 in their respective List of Stakeholders Information FY 2022 which consists of stakeholders among Local Community Heads, Neighbours, Local Authorities, Vendors (Contractors &amp; Suppliers).</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>Contracts contain specific clauses on meeting applicable legal requirements available in the Vendor Integrity Pledge records for sampled contractors i.e.</p> <p>1. <u>West POM</u></p> <ul style="list-style-type: none"> <li>- Akeh Reztech Engineering Sdn Bhd. (Reg No.: 841599-D)</li> <li>- Alam Hijau Integrasi (M) Sdn Bhd. (Reg No.: 721578-M)</li> <li>- Arrima Tec Sdn Bhd (Reg No.: 942206-O)</li> <li>- Att Trading (Reg.: SA 0034902-T)</li> </ul> <p>2. <u>West Estate</u></p> <ul style="list-style-type: none"> <li>- Bumi Sejahtera (M) Sdn Bhd. (Reg Number: 677582-M)</li> <li>- Tana Agro Enterprise (Reg Number: SA 02 40138-T)</li> </ul>	Non-compliance

		<p>- Chip Huat Excavator Work (Reg Number: 001033695-X)</p> <p>The Legal Due Diligence of contracted third parties were not fully demonstrated as below.</p> <p>During the visit o the FFB Contractor’s Workshop at West Estate, it was sighted that the management of the workshop does not meet the legal requirements as stated in the contract agreements.</p> <ol style="list-style-type: none"> <li>1. Schedule Waste materials such as spent chemical containers, spent batteries, spent lubricants, and spent lubricant drums were not disposed to licensed Scheduled Waste Manager.</li> <li>2. Unsatisfactory housekeeping of the site with scattered waste materials.</li> <li>3. The Workshop Attendant was not wearing appropriate PPE during work.</li> <li>4. Oxygen and Acetylene Tanks were not chained and not equipped with Flashback Arrestors to reduce risks of accidents and injuries.</li> <li>5. Lubricant Drums were seen transferred into unlabelled containers.</li> <li>6. Diesel Tank have been stationed at the workshop without proper safety compliances such as fire extinguishers, bunds to contain spillage and without Fire Department approval.</li> </ol>	
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>The contract documents and Vendor Integrity Pledge (VIP) records sighted in the indicator 2.2.2 above also contain clauses disallowing child, forced and trafficked labour. No young workers are employed by contractors and vendors.</p>	Complied
<p><b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.</p>			

2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>The mill received only crop from the SDP estates, mainly from the West Estate, others if any are from diversion from the sister mill as results of breakdown or annual maintenance. All the estates from the same SOU 09 possessed the following information sighted and verified during the audit</p> <p>a) All FFB from the SDP estates supported by the delivery documents.</p> <p>b) Valid land title with ownership status (refer indicator 4.4.1)</p> <p>c) Valid MPOB licence (refer criteria indicator 2.1.1)</p> <p>All delivery documents were verified with volumes of FFB received by the mill.</p>	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>There is no smallholders crop received or processed in West Palm Oil Mill.</p>	Complied
<p><b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b></p>			
<p><b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The business plan for the mill is reflected in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX. Also available the Mill Improvement Plan (MIP)/Maintenance Plan updated on 31/12/2021.</p> <p>The business or management plan for the estate was presented in the form of annual budget with 4 years projection (2022 – 2025). The annual budget contains the crop projection and the finance allocation for field operation and administrations. The management</p>	Complied

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		has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.													
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	<p>West Estate has prepared the replanting programme with minimum of 5 years projection. The review of the programme is done at the end of every year. Below are the details of the programme:</p> <table border="1"> <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>Ha</td> <td>233.82</td> <td>266.01</td> <td>250.80</td> <td>252.52</td> <td>247.96</td> </tr> </tbody> </table>	Year	2022	2023	2024	2025	2026	Ha	233.82	266.01	250.80	252.52	247.96	Complied
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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>Management review meeting for the Mill was last conducted on 19/01/2022. It was chaired by the Mill Manager and attended by 24 keypersons. Management Review meeting for the estate was conducted on 13/01/2022 chaired by the Senior Manager attended by 16 other keypersons.</p> <p>Among the agenda discussed were:</p> <ul style="list-style-type: none"> <li>- Results of internal audit</li> <li>- Customer feedback</li> <li>- Status of preventive and corrective actions</li> <li>- Follow-up actions from previous management review</li> <li>- Changes that could affect management system</li> <li>- Recommendations for improvement</li> </ul>	Complied												
<p><b>Criterion 3.2:</b> 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>															

<p>3.2.1</p>	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>This has been established in the Continuous Improvement Plan 2022 updated in Jan 2022 respectively for both the Mill and Estate. This compilation was made with subject to the consideration of the main social and environmental impacts. These include to continue engagement with relevant stakeholders (workers, surrounding communities, government agencies, agencies, suppliers and contractors. Management documents related to environmental plans and impact assessments maintained available. Among the documents were:</p> <ul style="list-style-type: none"> <li>(a) Environmental Aspect Identification (EAI) and Environmental Impact Evaluation (EIE) registers.</li> <li>(b) Environmental Improvement Plan 2022</li> <li>(c) Pollution Prevention Plan 2022</li> <li>(d) Water Management Plan. 2022</li> <li>(e) Waste Management Plan 2022</li> </ul> <p>The Continuous Management Plan 2022 for the estate/mill operations among others include the following;</p> <table border="1" data-bbox="1144 975 1904 1388"> <thead> <tr> <th></th> <th>Projects</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td></td> <td>West Estate</td> <td></td> </tr> <tr> <td>1</td> <td>MTG 4 units</td> <td>FFB mechanisation Mac 22 - RM467K</td> </tr> <tr> <td>2</td> <td>ST 102 - 6</td> <td>Spraying selective April 22 - RM 571K</td> </tr> <tr> <td>3</td> <td>P 25 - 1 unit</td> <td>P &amp; D Spraying April 22 - RM156K</td> </tr> <tr> <td>4</td> <td>Kubota raker</td> <td>5 units circle sanitation April 22 - RM 300K</td> </tr> <tr> <td>5</td> <td>Worker housing</td> <td>30 units April 22 - RM 3.3M</td> </tr> <tr> <td>6</td> <td>Staff quarters</td> <td>4 units June 22- RM 900K</td> </tr> <tr> <td>7</td> <td>Bund 3500 m</td> <td>Heightening/straightening April22 RM580K</td> </tr> </tbody> </table>		Projects	Details		West Estate		1	MTG 4 units	FFB mechanisation Mac 22 - RM467K	2	ST 102 - 6	Spraying selective April 22 - RM 571K	3	P 25 - 1 unit	P & D Spraying April 22 - RM156K	4	Kubota raker	5 units circle sanitation April 22 - RM 300K	5	Worker housing	30 units April 22 - RM 3.3M	6	Staff quarters	4 units June 22- RM 900K	7	Bund 3500 m	Heightening/straightening April22 RM580K	<p>Complied</p>
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<p>3.2.2</p>	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b>          The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>Production data including the FFB processed and CPO, CPK produced has been checked and verified against the Jan - Dec 2021 report. Inclusive is OER/KER. This data has also being compared and tally with the GHG report declaration.</p>	<p>Complied</p>																																				
<p><b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.</p>																																							

<p>3.3.1</p>	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.          - Critical (Major) compliance -</p>	<p>SOU 09 West continued to use the documents established by the Sime Darby Plantation Bhd among others as follows;</p> <ul style="list-style-type: none"> <li>a) Plantations / Mill Quality Management System (PQMS / MQMS) Manual</li> <li>b) PQMS/MQMS Standard Operating Manual &amp; Procedures (SOP)</li> <li>c) Palm Oil Mill Lab Process Control Procedure / Oil Mill Lab operations &amp; Test Method Guidelines</li> <li>d) Sustainable Plantation Management System (SPMS) Manual</li> <li>e) RSPO Supply Chain Manual</li> <li>f) ESH Management System Manual - 01/7/2012</li> <li>g) Occupational Safety and Health Manual</li> <li>h) Pictorial Safety Standards dated 17/3/2008</li> <li>i) Laboratory Process Control Manual</li> <li>j) Security Guidelines.</li> </ul> <p>In addition, technical guidelines as listed in the Agricultural Reference Manual were also used. In general the documents included operation activities in the estates and the mills from;</p> <ul style="list-style-type: none"> <li>a) seedlings in nursery to planting of young palms.</li> <li>b) plantation upkeep to mill FFB receipt, grading, processing.</li> <li>c) quality analysis and dispatch of CPO &amp; PK.</li> <li>d) security in the SOU.</li> </ul> <p>Contents of the Manual were disseminated to the workers through;</p> <ul style="list-style-type: none"> <li>a) morning muster</li> <li>b) mill weekly briefings</li> </ul>	<p>Complied</p>
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		<p>c) training as ad hoc and programmed basis.</p> <p>The Manuals are also kept in the administration office to facilitate reference by any interested parties. Site inspection and interview with workers confirmed that the SOPs had been implemented and the employees understood the requirements of the SOPs.</p> <p>The mill processing system is documented in the Sustainability Plantation Management System MQMS/SQM/08 v 1 dated 01/11/2008 which includes the mill SOP, and Mill Quality Management Manual v.1 2008/MQMS/QMM/08. These documents provide guidelines and standards in the mill operations. The Standard Operating procedures (SOPs) described details from the</p> <ul style="list-style-type: none"> <li>a) reception, sterilisation,</li> <li>b) threshing, pressing,</li> <li>c) clarification, nut polishing station,</li> <li>d) effluent, laboratory,</li> <li>e) workshop, dispatches etc.</li> </ul> <p>In addition, there are also manuals available within the industry and MPOB that are used as guidelines.</p> <p>The procedures were communicated to workers through training and infield supervision. Interview with workers showed that the information in the procedures had been effectively communicated. Site inspection and interview with workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs.</p>	
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<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>Both the estate and the mill had an established mechanism to perform checking to ensure consistent implementation of procedures</p> <p><i>West Palm Oil Mill</i></p> <p>a) Daily Production Report (sighted 31/12/2021) providing details as follows;</p> <ul style="list-style-type: none"> <li>- FFB received / processed / balance</li> <li>- FFB certified non-certified quantity</li> <li>- Produce production / despatch / balance</li> <li>- Storage capacity/ status / laboratory results</li> </ul> <p>b) Unscheduled General Manager – Processing min twice monthly</p> <p>c) Mill advisor visit 06-07/7/2020 - at score of 71.0</p> <p>d) Mill advisor visit 21-22/10/2019 at marking of 61.0</p> <p>e) Internal audit has carried on 09/12/2022 for inspect compliance on ISCC/MSPO/RSPO standard requirement. The results were presented in the Management Review held on 19/01/2022 were satisfactory and CU has established the proper and maintain the record of request documentation.</p> <p>f) Regulatory authority visit i.e.</p> <ul style="list-style-type: none"> <li>- DOSH machinery inspection dated 01/9/2021 / 06/4/2021 / 08/2/2021</li> <li>- DOE visit on 08/2/2022 /25/08/2022 enforcement visit</li> </ul> <p><i>West Estates Operations</i></p> <p>The monitoring of the SOP implementation are made by the all levels of the supervisory personnel with records maintained and checked. Among others the records maintained are;</p>	<p>Complied</p>
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		<p>a) Daily production/work records for the core activities at the estates</p> <p>b) field cost book / chemical consumption record</p> <p>c) mature/immature field work program</p> <ul style="list-style-type: none"> <li>- fertilizer application,</li> <li>- herbicide spraying, / rat baiting ,</li> <li>- Harvesting and collection of FFB.</li> <li>- Water management action plan in relation to bund management / tide gate management / desilting program.</li> </ul> <p>All the above records were kept for a minimum period of 12 months. In addition the management adopted the following check and balances through visit of the following dept /superiors</p> <p>a) Agronomic advisory report and fertilizer recommendation minimum 1x/year to monitor matters relating to;</p> <ul style="list-style-type: none"> <li>- nutrient deficiency, fertilizer program,</li> <li>- pest &amp; disease ganoderma infection, rat and RB attack,</li> <li>- EFB mulching program for the year etc.</li> </ul> <p>b) Plantation Advisory visit producing "<i>Estate Visit Report</i>" at frequency of 1x/year performing assessment relating to;</p> <ul style="list-style-type: none"> <li>- land use, capital expenditure, general charges,</li> <li>- oil palm (mature &amp; immature area) field condition</li> <li>- crop performance and cost</li> <li>- vehicles &amp; equipment, amenities,</li> <li>- labour and security etc</li> <li>- Replanting activities at PR21A/PR20/PR19</li> <li>- Replanting activities by Contractors are monitored to ensure compliance against the SDP and industry standards.</li> </ul>	
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		<p>- Report dated 26/11/2020 and 24/06/2020 was sighted and verified.</p> <p>Internal audit by the Agronomy Dept (Sustainability Unit) scheduled 2x/year for each unit. The exercise is to inspect and monitor compliance on ISCC/MSPO/RSPO standard requirement. Results from assessment of which are tabled and discussed during the Management Review.</p> <p>The mechanisms as established have been implemented. This is verified via the records maintained in all units daily, monthly and annually. Estate are monitored to ensure compliance against the SOP standard and factors relating to ESH.</p> <table border="1" data-bbox="1144 767 1823 1367"> <thead> <tr> <th colspan="3">West Estate</th> </tr> <tr> <th></th> <th>Areas</th> <th>Action/Activities</th> </tr> </thead> <tbody> <tr> <td rowspan="3">1</td> <td rowspan="3">Daily</td> <td>Supervision by field staff/Assist/Manager</td> </tr> <tr> <td>Report of daily activities/costings/variation</td> </tr> <tr> <td>WA group - digital supervision</td> </tr> <tr> <td rowspan="6">2</td> <td rowspan="6">Schedule</td> <td>Quarterly ESH meeting</td> </tr> <tr> <td>RCEO/ RGM visits on field activities</td> </tr> <tr> <td>Internal audits by GCAD/SHO</td> </tr> <tr> <td>Annual EPMC</td> </tr> <tr> <td>External audit RSPO /MSPO</td> </tr> <tr> <td>HQ visits / Agronomist visits</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2"></td> <td>Zone Head / Regional Controller visits</td> </tr> <tr> <td>Visits by KKM</td> </tr> </tbody> </table>	West Estate				Areas	Action/Activities	1	Daily	Supervision by field staff/Assist/Manager	Report of daily activities/costings/variation	WA group - digital supervision	2	Schedule	Quarterly ESH meeting	RCEO/ RGM visits on field activities	Internal audits by GCAD/SHO	Annual EPMC	External audit RSPO /MSPO	HQ visits / Agronomist visits	3		Zone Head / Regional Controller visits	Visits by KKM	
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3	Annual	Annual EPMC Medical surveillance																						
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>The implementation of SOP are monitored on a daily basis by the field staffs and Assistant Managers with overall overview by the Managers. The monitoring is made via supervision and records maintenance. The estates among others maintained the following records.</p> <ul style="list-style-type: none"> <li>a) work program / Field cost books</li> <li>b) bin cards, Harvesting Intervals,</li> <li>c) Monthly Estate Report and Account,</li> <li>d) Monthly Operations, monthly rainfall,</li> <li>e) pest and diseases monthly return,</li> </ul>	Complied																					

		<p>f) agrochemical monthly consumption</p> <p>g) harvesting details i.e. daily inspection report - yield improvement program,</p> <p>h) summary of machinery running hours</p> <p>i) harvesting records detailing the number of bunches harvested</p> <p>j) quantity of loose fruit collected by each harvester.</p> <p>k) Monthly FFB production, etc.</p> <p>Similarly the mill, the monitoring records maintained among others were related to;</p> <p>a) monitoring of effluent / black smoke</p> <p>b) Processing &amp; produce parameters</p> <p>c) Dispatches / scheduled wastes etc.</p> <p>d) monitoring consistent implementation of procedures through internal audit</p> <p>e) daily shift report for the process performance .</p> <p>f) There was a flow chart showing method for monitoring compliance of requirements including legal requirements.</p> <p>g) Internal audits are performed once a year minimum.</p> <p>Activities carried out by contractors are being monitored via the following among others</p> <p>a) to obtain work permit for confined spaces or work at height in the Mill</p> <p>b) evidences of competency for specialized work/job</p> <p>c) The mill supervisors and engineers will be onsite to monitor the work.</p>	
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		<p>d) The estates monitor to ensure that no contractors bring along their family members to work in the field.</p> <p>e) The estates ensure that the contractors are providing PPE, suitable working equipment and machinery.</p> <p>Records of follow up action, if any, are retained where necessary.</p>	
<p><b>Criterion 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p><b>(C)</b> 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 operations within SOU 09 West CU. However there were plans and impact assessments relating to environmental impacts based on documents as following:</p> <p>a) Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register</p> <p>b) Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI</p> <p>c) Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE.</p> <p>There is no change of current practices required to mitigate negative effects based on identified impacts for both the mill and estates. However the mill and estates have conducted periodical review on the aspects and impacts identified and evaluated as registered.</p> <p>The mill and estates has continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan. Managers and Assistant Managers of mill and estate were identified as person-in-charge of the programs which</p>	<p>Complied</p>

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were established upon review of the aspect and impact register. It was observed that the reviewing and updating on the registers were made annually if there's no any new activity within respective sites.

	Projects	Details
West Estate		
1	MTG 4 units	FFB mechanisation Mac 22 - RM467K
2	ST 102 - 6	Spraying selective April 22 - RM 571K
3	P 25 - 1 unit	P & D Spraying April 22 - RM156K
4	Kubota raker	5 units circle sanitation April 22 - RM 300K
5	Worker housing	30 units April 22 - RM 3.3M
6	Staff quarters	4 units June 22- RM 900K
7	Bund 3500 M	Heightening/straightening April22 RM580K
8	New Tide Gates	Additional 4 units - Mac 22 - RM 300K
9	water pump	1 additional portable set-May 22 RM150K
10	Satellite w/shop	Upgrading workshop and training facilities tractors drivers Sept 22 - RM500K
11	Housing	O/head cable power supply April 22 RM500K
West POM		
1	New 6 houses	Additional new units June 22 - RM600K
2	Playground	Facilities for employees Sept 22 - RM60K
3	SORS	Sludge oil recovery Mac 22 -RM200K
4	Decanter	I new unit for process April 22 - RM250K

		<table border="1"> <tr> <td data-bbox="1144 368 1211 443">5</td> <td data-bbox="1211 368 1413 443">New Boiler</td> <td data-bbox="1413 368 1906 443">Replacement increased capacity 2023 - RM8M</td> </tr> <tr> <td data-bbox="1144 443 1211 491">6</td> <td data-bbox="1211 443 1413 491">Electrical supply</td> <td data-bbox="1413 443 1906 491">TNB meter installation 2024 -RM1M</td> </tr> </table> <p>The Social Impact Assessment (SIA) Report carried out o 27 – 28/03/2014 for SOU 9 by Social &amp; Environmental Projects Unit, PSQM Department. The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, schools’ representatives, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety and health, living condition, infrastructure and amenities and stakeholder engagement were assessed accordingly.</p>	5	New Boiler	Replacement increased capacity 2023 - RM8M	6	Electrical supply	TNB meter installation 2024 -RM1M	
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6	Electrical supply	TNB meter installation 2024 -RM1M							
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>SOU 09 West has a separate Social Impact Assessment (SIA) and Environmental Impact Assessment reports. It mentioned the objectives, category, action, frequency, person in charge and monitoring period.</p> <p>Among others as summarised below:</p> <p>a) To ensure compliance to SOP and legal requirement regarding social (appointment of person in charge/committee to handle social matters, communication on policies/SOP on social to relevant stakeholders, monitoring of pay and agreement of workers and contractor’s workers and to maintain housing and facilities provided to workers). based on inputs received from external stakeholders during stakeholder meetings, union meetings, JCC meetings, and Gender Committee</p> <p>b) To contribute to local communities development</p>	Complied						

based on inputs received from external stakeholders during stakeholder meetings, union meetings, JCC meetings, and Gender Committee meetings.

c) Among the issues considered with the stakeholders include:  
 There is no new planting in SOU 9 (West POM Certification Unit). Methodology of assessment is based on interview at workstation for harvesters, sprayers, union representatives, gender committee, contractor, supplier, local community, neighbouring estate, government & School. The secondary data collection – document review/file checking also been made. Main aspects/concerns identified by the assessor:

- Housing condition/living improvement
- Working condition

The aspect and impact analysis for all the mill/estate operations are documented and revised annually recent being Jan 2022. In the comprehensive report, the study of aspect and impact are aimed to;

- a) Plan to avoid negative impact and to promote positive impacts.
- b) Reduction disposal of waste taking into consideration of social responsibilities.
- c) Plan to reduce pollution and release of GHG
- d) Development and implementations.

The aspect and impact covered the following activities/operations among others;

	West Estate		
	Activities		Activities
1	Poisoning of VOPs/ woodies	7	Vehicle maintenance by contractors
2	Circle spraying	8	EFB application

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<p>3.4.3</p>	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>The Social/Environmental Action Plan available for each units were available having information i.e issues, management plan, PIC and time frame. The input are gathered from the meeting minutes</p> <p>a) Gender Committee, NUPW, b) Safety Meeting, c) Complaint &amp; Request from internal &amp; external stakeholders and muster briefing). d) Stakeholders meeting</p> <table border="1"> <thead> <tr> <th></th> <th>OU</th> <th>Review date</th> <th>Updates</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>WPOM</td> <td>13/01/2022</td> <td>No changes - no new activities</td> </tr> <tr> <td>2</td> <td>West Estate</td> <td>03/01/2022</td> <td>No changes</td> </tr> </tbody> </table> <p><u>West Estate</u></p>		OU	Review date	Updates	1	WPOM	13/01/2022	No changes - no new activities	2	West Estate	03/01/2022	No changes	<p>Non-compliance</p>																																								
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		<p>Site specific internal stakeholders/workers based on issue as discussed in the "estate matters" logbook/Union meeting log book.</p> <ul style="list-style-type: none"> <li>- Breach of contract agreement/contract substitution (check-roll worker)</li> <li>- Breach of contract agreement/Vendor Integrity Pledge/compliance declaration (contractor)</li> <li>- Domestic violence issue, based on meeting minute dated 10/3/21</li> <li>- Gambling issue, based on meeting minute dated 10/3/21</li> </ul> <p>The above issues were not captured in the latest SIA management plan and yet to be updated in a participatory way.          Thus, a major NC was raised.</p>	
<b>Criterion 3.5:</b> A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>The Human Resource Department in HQ has established Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019 and Workforce Management Unit Liaison &amp; Recruitment procedure (WMU/LR-SOPP/MARCH2016, Rev. 0 dated 30/03/2016) to explain the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Application form, employment interview assessment form, medical check-up report and employment contract was sighted for new recruited employees. The latest recruitment of workers in West Estate was on 19<sup>th</sup> November 2021. A copied of identification card was kept as record. Interviewed with the clerk confirmed that if there is any job vacancy available, they will publish a job vacancy advertisement/flyer at the places nearby the villages.</p>	Complied
<b>Criterion 3.6:</b> An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			

<p>3.6.1</p>	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.          - Critical (Major) compliance -</p>	<p><u>West POM</u></p> <ol style="list-style-type: none"> <li>1. HIRARC was established in the mill to assess the identified risks and hazards of all operations in the mill and too provide control measures to reduce and eliminate where possible the risks. The HIRARC was reviewed on 13/01/2022. Among the HIRARC verified were for Kernel Plant, Boiler Operation, Sterilizer Operation and Effluent Treatment Plant.</li> <li>2. Chemical Health Risk Assessment was conducted in the mill to check the compliance to the provisions of the USECHH Regulations 2000 with respect to exposure to chemicals hazardous to health at the workplaces. The assessment was conducted by Gat Consultancy Sdn Bhd on 15/07/2020. The CHRA Report (Report Number: HQ/09/ASS/00/124 - 2020/0027) was available for verification.</li> <li>3. Medical Surveillance was conducted in the mill for workers exposed to Hexane. A total of 10 workers were examined and the results indicated that all 10 workers had normal results with no occupational related symptoms,</li> <li>4. Noise Risk Assessment (NRA) was conducted in the mill on 26/02/2021 in compliance to Occupational Safety and health (Noise Exposure) Regulation 2019. The Assessment was conducted by Alam Hijau Integrasi (M) Sdn Bhd, (NRA Registration: HQ/13/PEB/00/122). The NRA Report (Report Number: ALM/NOISE/WOM/0221/6591 was available for verification.</li> <li>5. Audiometric Test was conducted based on the recommendation in the NRA for workers exposed to excessive noise in the mill. The Audiometric Testing (Baseline &amp; Annual) was conducted by Alam Hijau Integrasi (M) Sdn Bhd for a total of 110 employees on 19/04/2021. Of the 110 employees tested, 6 employees</li> </ol>	<p>Complied</p>
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		<p>were found to have hearing impairment at different levels and 4 employees were found to have standard threshold shift.          Employees with hearing impairment were required to be repeat audiometric test within 3 months (19/07/2021).</p> <p><u>West Estate</u></p> <ol style="list-style-type: none"> <li>1. HIRARC was established in the estate to assess all risks and hazards associated to all the operations in the estate. All risks identified is recorded in the HIRARC. The controls are then derived to ensure the risks of the operations is minimized.</li> <li>2. Chemical Health Risk Assessment (CHRA) was conducted in the estate to assess the hazards and risks associated to the chemicals used in the estate. The CHRA assessment was conducted by GAT Consultancy Sdn Bhd on 11/11/2020; DOSH Ref Number: HQ/09/ASS/00/124). The CHRA Report (Report Number: HQ/09/ASS/00/124 – 2020/0032) was available for verification.</li> <li>3. The Noise Risk Assessment was conducted in the mill in compliance to the Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted on 26/10/2021 by Renash Solution (M) Sdn Bhd. Report Reference Number: HQ/10/PEB/00/112.</li> </ol> <p>Audiometric Test has been proposed to be conducted for the mill workers in accordance with the recommendation stated in the Noise Risk Assessment. The Audiometric Test is proposed to be conducted end of February 2022.</p>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.          - Critical (Major) compliance -</p>	<p>The effectiveness of the Health and Safety Plan were inadequately monitored in the mill and estate based on the evidence as below:  <u>West POM</u></p>	<p>Non-compliance</p>



		<p>1. The Audiometric Testing (Baseline &amp; Annual) was conducted by for a total of 110 employees on 19/04/2021. Of the 110 employees tested, 6 employees were found to have hearing impairment at different levels and 4 employees were found to have standard threshold shift (STS). Employees with STS were required to be repeat audiometric test within 3 months (19/07/2021). Due to the report received late, on 29/09/2021 the retest was only conducted on 27/12/2021. Nevertheless, it was verified that only 2 out of 4 workers have been retested according to the recommendation and the balance 2 workers have yet to be retested as of to date.</p> <p><u>West Estate</u></p> <p>1. The HIRARC for Power Spraying – Mature Fields were established and reviewed on 15/12/2021. The HIRARC stated Work Activity: Spraying Activities; Hazard: Contact with Chemicals; Existing Risk Control: PPE (Respirator).</p> <ul style="list-style-type: none"> <li>– During the visit to Field 20E, it was noticed that the 2 power sprayer attendants were not wearing respirator during the operation.</li> </ul> <p>2. The HIRARC for Harvesting were established and reviewed on 15/12/2021. The operations using mechanical grabber stated existing control as to wear safety boot. The management have implemented PPE checklist were PPE are checked daily before the work commences.</p> <p>During the visit o Field P96P1, it was noticed the grabber driver was wearing safety shoe, but the safety shoe was badly damaged.</p>	
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**Criterion 3.7:** All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.

3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>A training programme has been developed and available in the Training Requirement for Operating Units (Mills &amp; Estate). The trainings were sighted to have included Gender Specific Training and involves staffs and workers. Covid-19 training and briefings were sighted at the mill and estates.</p>	Complied																								
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Records of trainings were maintained by the Mill and all estates as below: -</p> <p>West POM</p> <table border="1" data-bbox="1137 703 1928 1201"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>COBC Training</td> <td>01/02/2021</td> </tr> <tr> <td>First Aid Training</td> <td>03/02/2021</td> </tr> <tr> <td>Industrial Waste Management Training</td> <td>17/11/2021</td> </tr> <tr> <td>MSDS &amp; CSDS Training</td> <td>17/11/2021</td> </tr> <tr> <td>Payroll Briefing</td> <td>19/11/2021</td> </tr> <tr> <td>Laboratory Equipment Operation Training</td> <td>07/10/2021</td> </tr> <tr> <td>TPM System Training</td> <td>21/06/2021</td> </tr> <tr> <td>Chemical Handling Training</td> <td>17/11/2021</td> </tr> <tr> <td>Lubricant Handling Training</td> <td>05/08/2021</td> </tr> </tbody> </table> <p>West Estate</p> <table border="1" data-bbox="1137 1289 1928 1383"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Sexual Harassment Training</td> <td>01/12/2021</td> </tr> </tbody> </table>	Training	Date	COBC Training	01/02/2021	First Aid Training	03/02/2021	Industrial Waste Management Training	17/11/2021	MSDS & CSDS Training	17/11/2021	Payroll Briefing	19/11/2021	Laboratory Equipment Operation Training	07/10/2021	TPM System Training	21/06/2021	Chemical Handling Training	17/11/2021	Lubricant Handling Training	05/08/2021	Training	Date	Sexual Harassment Training	01/12/2021	Complied
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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Training for SCCS is sighted dated 21/08/2021 that been include 7 personnel for the implementation of SCCS in West Palm Oil Mill.</p> <p>The job description has been sighted in the appointment letter. A presentation slide has been provided for evidence. Presentation by Group Sustainability Quality Management. Interview conducted with weighbridge clerk confirmed that they understand the requirement.</p>	Complied														
<p><b>Criterion 3.8:</b> Supply chain requirement for mills          (note: All supply chain requirements are considered as <b>Critical (C)</b>. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>																	
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB</p>	<p>FFB were obtained from all Sime Darby certified estates only. There was no third party's FFB nor non-certified FFB received by the mill. This was verified during the stakeholders meeting and site visit at mill.</p>	Complied														

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	without physically separating them, then only Mass Balance Module is applicable.		
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	Not applicable as West POM applied Identity Preserve (IP) supply chain module.	Not Applicable
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. (Table 10)	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	All registrations of CPO & PK transaction have been made in the RSPO PalmTrace. A list of registered transactions extracted from RSPO PalmTrace was made available for verification	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"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>	<p>Procedure namely Sime Darby Plantation – Plantation Quality Management System – Sustainable Plantation Management System; Appendix 15; Standard Operating Procedure (SOP) for Sustainability Supply Chain and Traceability; Version 2; Issue no.: 5; Issue date: April 2019.</p> <p>The procedure was established which covers responsibility, reporting of certified CPO/PK, non-conformance material, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint Communication and Claim and etc.</p>	Complied

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	<p>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.</p>	<p>1. The Mill Manager as Head of Operating Unit has the overall responsibility for the implementation of SOP, and he may assign roles to relevant personnel or invite personnel from various departments necessary to assist in the SOP implementation. Sighted the identified and assigned suitable employees to implement and maintain the traceability system by management is Nur Syafiqah Binti Rayme (Assistant Manager) – RSPO/ISCC/MSPO Representative dated 23/02/2020.</p>	
<p>3.8.6</p>	<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>Sime Darby Plantation Berhad have established the Internal Audit Procedure, Doc. No.: SD/SDP/PSQM/IAP, Rev. 2 dated 1/11/2017.</p> <ul style="list-style-type: none"> <li>- Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019, Section 18.0 where the annual internal audit is to determine the mill conforms to the requirements of RSPO and MSPO SCCS.</li> <li>- The frequency of the internal audit was at least annually.</li> </ul> <p>The latest RSPO SCCS Internal Audit was carried out on 09/12/2021 by Sustainability Compliance Unit, GSD. Based on the internal audit report, there were no non-conformity raised under the RSPO SCCS requirements and the coverage was found to be satisfactory.</p>	<p>Complied</p>
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>The accompanying documents of incoming FFB from own estate are estate’s weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate’s ticket number is recorded in the mill’s ticket number.</p> <p>Sampled the weighbridge ticket for incoming FFB as below.</p>	<p>Complied</p>

		<p>a. West Estate (Own Supply Base)</p> <ul style="list-style-type: none"> <li>- Product: FFB B Crop</li> <li>- D.O Number: 198471</li> <li>- Delivery Date: 11/01/2022</li> <li>- Estimated Tonnage: 9.240 Mt</li> <li>- Vehicle Number: KT 464 Q</li> <li>- RSPO Cert Number: RSPO 543594</li> </ul> <p>b. East Estate (Other RSPO Certified Estate – Diverted Crop)</p> <ul style="list-style-type: none"> <li>- Product: FFB B Crop</li> <li>- D.O Number: 429488</li> <li>- Delivery Date: 12/11/2021</li> <li>- Estimated Tonnage: 8.380 Mt</li> <li>- Vehicle Number: BES 9639</li> <li>- RSPO Cert Number: RSPO 543543</li> </ul> <p>c. Sungai Buloh Estate (Other RSPO Certified Estate – Diverted Crop)</p> <ul style="list-style-type: none"> <li>- Product: FFB B Crop</li> <li>- C.N Number: 137806</li> <li>- Delivery Date: 08/07/2021</li> <li>- Estimated Tonnage: 19.930 Mt</li> <li>- Vehicle Number: BQG 9017</li> <li>- RSPO Cert Number: RSPO-PC00108</li> </ul>	
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		<p>There has been no projected overproduction during the period under reviewed. Nonetheless, based on interview with the staff, the facility is aware of this requirement.</p> <p>Handling of non-conforming FFB and/or documents is addressed in the Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019, Clause 7.7. There has been no issue about non-conforming FFB and/or document during the period under review.</p>	
<p>3.8.8</p>	<p><b>Sales and Goods Out</b></p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<p>West POM has ensured that all the required information is available in document form for any sales of MB-Certified products. CPO and PK has been sold during the audit period and sampled records of transactions have been verified as follows.</p> <p><u>IP Certified CSPO</u>          (Contract No: S/C-PSD/2104/CPO0165)</p> <ul style="list-style-type: none"> <li>a. Buyer: SDP Joma Ref; Batu 9, Jln Banting – Klang, Teluk Panglima Garang Industrial Estate, 42500 Teuk Panglima Garang.</li> <li>b. Seller: Sime Darby Plantation Berhad, Kilang Kelapa Sawit West.</li> <li>c. Delivery Date: 05/03/2021</li> <li>d. Documents Issue Date: 05/03/2021</li> <li>e. RSPO Certificate Number: RSPO 543594</li> <li>f. Product Description: SQ RSPO CPO IP</li> <li>g. Product Quantity: 37, 150 KG</li> <li>h. Related Transport documentation: Borang MPOB L3</li> <li>i. Identification Number: Ticket # 021047</li> </ul>	<p>Complied</p>

		<p><u>IP Certified PK</u>          (Contract No: S/C-PSD/2111/PK0130)</p> <ul style="list-style-type: none"> <li>a. Buyer: SDP Carey KCP – SDP Nuri KCP (NK)</li> <li>b. Seller: Sime Darby Plantation Berhad, Kilang Kelapa Sawit West.</li> <li>c. Delivery Date: 12/03/2021</li> <li>d. Documents Issue Date: 12/03/2021</li> <li>e. RSPO Certificate Number: RSPO 543594</li> <li>f. Product Description: RSPO PK IP</li> <li>g. Product Quantity: 18,840 KG</li> <li>h. Related Transport documentation: Collection Order (PK) (PK No: 47186), Palm Kernel Despatch Note (Doc No: 2404).</li> <li>i. Identification Number: Ticket # 021979</li> </ul>	
<p>3.8.9</p>	<p><b>Outsourcing Activities</b></p> <ul style="list-style-type: none"> <li>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</li> <li>ii) The mill shall ensure the following:             <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>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</li> </ul> </li> </ul>	<p>No FFB or oil palm products processing outsource by West POM except for CPO delivery transportation only. The mill adapted Sime Darby established Standard Operating procedure for outsourced activities as per Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019, Section 13.0: Outsourced Contractors.</p> <p>In the SOP under section 13.1 stated that CPO Mill cannot outsourced processing activities like refining or crushing.</p> <p>The list of outsourced contractors was registered in List of Stakeholder records that CPO transporter as per sighted contract agreement as following:</p>	<p>Complied</p>



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	<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>FGV Transport Services Sdn Bhd; Reference Number: T/SDPB/PEN/CPO/0720/003; Date: 12/12/2020; Contract Expiry Date: 31/10/2023.</p>	
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>No FFB and/or oil palm products processing outsource by West POM except for CPO delivery transportation only. The list of outsourced contractors was registered in List of Stakeholder records that included the CPO transporter.</p>	<p>Complied</p>
3.8.11	<p>The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.</p>	<p>Sime Darby has issued Memorandum to all contractors dated 26/06/2019. In the memorandum stated the contractors have to comply as follows.</p> <ul style="list-style-type: none"> <li>a. Comply with local legal requirements</li> <li>b. Attend the RSPO/ISCC/MSP0/SCCS briefing or training organized by the company</li> <li>c. Having signed and enforceable agreement with the company</li> <li>d. Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary</li> <li>e. Having related working permits</li> </ul> <p>Ensure PPE utilization by contractors' employee while being in the company premise.</p>	<p>Complied</p>
3.8.12	<p>Record keeping</p>	<p>i) All the sampled records related to the movements of RSPO certified materials and products were found to be accurate,</p>	<p>Complied</p>

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	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>iv) For Mass Balance Module, the mill:             <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ul> </li> </ul>	<p>complete, up-to-date, and accessible.</p> <ul style="list-style-type: none"> <li>ii) The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 in Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019.</li> <li>iii) All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are recorded on a real-time basis in the mill's Daily Production Report for period of March 2021 to January 2022.</li> <li>iv) NA as the mill is using IP model</li> </ul>	
<p>3.8.13</p>	<p><b>Extraction Rate</b>          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 extraction rate for mill is calculated in daily production detail report. Conversion factor of CPO and PK production is depending on the actual OER and KER.</p>	<p>Complied</p>
<p>3.8.14</p>	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</p>	<p>Complied</p>

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>The mill does not accept non-certified FFB. Thus, 100% separation is assured.</p>	Complied
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>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>The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace.</p> <p>Based on the announcement summary, all the registrations were found to be in order.</p> <p>No RSPO volume sold for other scheme. RSPO certified volume only downgraded to conventional CPO/PK.</p>	Complied
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
<b>General corporate communications</b>			
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 by West POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc). Thus, this indicator is not applicable</p>	Not Applicable
4.2	<p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p> <p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p>	<p>Not applicable as no off-product claim made by West POM as to date.</p>	Not Applicable

	<p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by West POM as to date.	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 no off-product claim made by West POM as to date.	Not Applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by West POM as verified through documentations and websites.	Complied
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e. product/commodity with SCC model (CPO/Palm Kernel RSPO MB) and RSPO certificate number.	Complied
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the</p>	West POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable

	<p>product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
<b>Business to consumer communication</b>			
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.	Business to Business communication were made through the CSPO and CSPK trading contractual and transactions documentations between the mill and buyers. No further communications made by West POM for its raw products beyond its refinery and oleochemical plants buyers.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	No business to consumer communication on product specific claim made. West POM only producing crude and unfinished product. This is not applicable for West POM.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made. West POM only producing crude and unfinished product. This is not applicable for West POM.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	No business to consumer communication on product specific claim made. West POM only producing crude and unfinished product. This is not applicable for West POM.	Not Applicable
6.5	Members shall not communicate to consumers’ information about their suppliers’ RSPO membership status.	No business to consumer communication on product specific claim made. West POM only producing crude and unfinished product. This is not applicable for West POM.	Not Applicable

6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made. West POM only producing crude and unfinished product. This is not applicable for West POM.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made. West POM only producing crude and unfinished product. This is not applicable for West POM.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a> .	No business to consumer communication on product specific claim made. West POM only producing crude and unfinished product. This is not applicable for West POM.	Not Applicable
<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Oil palm content is 100% CPO and claimed as RSPO IP-certified.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	The products that claimed as SG were 100% originated from IP products produced by the mill. No mixture from other sources was made	Complied

	<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 volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.</p>	<p>Complied</p>
<p><b>Labelling and trademark (IP)</b></p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> <li>• RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li> </ul>	<p>As at to date, no RSPO trademark used by the mill.</p>	<p>Complied</p>
<p><b>Messaging (IP)</b></p>			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> </ul>	<p>As at to date, no RSPO trademark used by the mill.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>		
<p><b>Principle 4: Respect community and human rights and deliver benefits</b></p>			
<p><b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has established Group Sustainability &amp; Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding &amp; no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC). The HRC was last revised on August 2020. They promote the human rights, safeguard democracy and its institutions and not violate the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, they are committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them. Refer to Policy on the Protection of Human Rights Defenders (HRDs) dated 25/03/2020 for more information. <a href="#">Policy on the Protection of HRDs FINAL.pdf (sime-darbyplantation.com)</a>.The policies were communicated to stakeholders during stakeholder meetings.</p>	<p>Complied</p>



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		Besides, the briefing of the policy was conducted on 18/11/2021 in West Estate.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Sime Darby Plantation prohibits any form of harassment in their operation as per the policies above. Interviewed with the workers confirmed that no harassment by the management.	Complied
<b>Criterion 4.2:</b> 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	<b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistle blowers, complainants and community spokespersons play by lodging complaints in confidence.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in <a href="https://www.simedarbyplantation.com/corporate/whistleblowing">https://www.simedarbyplantation.com/corporate/whistleblowing</a> . Besides, the company has implemented "Suara Kami" as a platform for the workers to raise any issue. The workers in West Palm Oil Mill were briefed on the complaint mechanism during morning muster. Besides, external stakeholders were briefed during the stakeholder meeting. Interviewed with the internal and external stakeholders confirmed that they have been briefed and understood on the complaint mechanism implemented by the company. The latest	Complied

		initiative introduced (ULULA - Impact Worker Helpline) effective from 27/8/2021.	
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 -	The on-site verification through consultation among internal and external stakeholders and documented records reviewed shown that SOU9 keeps parties to a grievance informed of progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders in addressing issues raised by stakeholders. Furthermore, neither any complaints nor land dispute occurred in the SOU9 Certification Unit at the time of audit as verified through stakeholder consultation.	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 -	The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow.	Complied
<b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Contributions made by both mill and estate as following: <ul style="list-style-type: none"> <li>- Food bank "Kami Prihatin"</li> <li>- Backhoe rental for road repair</li> <li>- Donation for flood victim (Kampung Judah)</li> <li>- SMK Pulau Carey (food and hygiene kits) – flood victim</li> <li>- Communities affected with flood (Kg Orang Asli Sg Judah &amp; Sg Kurau) - food and hygiene kits</li> </ul>	Complied
<b>Criterion 4.4:</b> 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.			

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4.4.1	<p><b>(C)</b> 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>West Estate were able to demonstrate the evidence of legal ownership if its lands through possession of land titles. The estates has a list of all its land titles which have the information about names of lease, hectare, terms &amp; conditions, lease period and grant numbers. Copies of the land titles were available at the estate’s offices while the original were kept at headquarter.</p> <table border="1" data-bbox="1137 571 1935 887"> <thead> <tr> <th>Estate</th> <th>Land title</th> <th>Land use type</th> <th>Tenure</th> </tr> </thead> <tbody> <tr> <td>West Estate</td> <td>1. Land title No.: 334108; Lot No.: 958; 5,305.791935 hectares Total of 21 land titles: 5,755.69 ha</td> <td>Agriculture</td> <td>Freehold</td> </tr> </tbody> </table>	Estate	Land title	Land use type	Tenure	West Estate	1. Land title No.: 334108; Lot No.: 958; 5,305.791935 hectares Total of 21 land titles: 5,755.69 ha	Agriculture	Freehold	Complied
Estate	Land title	Land use type	Tenure								
West Estate	1. Land title No.: 334108; Lot No.: 958; 5,305.791935 hectares Total of 21 land titles: 5,755.69 ha	Agriculture	Freehold								
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>There is no land dispute in SOU 9 West POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.</p>	Complied								
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities’ and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>There is no land dispute in SOU 9 West POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company</p>	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 -	There is no land dispute in SOU 9 West POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company	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 -	There is no land dispute in SOU 9 West POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company	Complied
4.4.3	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There is no land dispute in SOU 9 West POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company	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 -	There is no land dispute in SOU 9 West POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company	Complied
4.4.5	<b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	There is no land dispute in SOU 9 West POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	There is no land dispute in SOU 9 West POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and	Complied

	- Minor compliance -	land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company	
<b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.2	<b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples,	No new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit.	Not Applicable

	the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	Consultation with relevant stakeholders conducted on-site confirmed the information.	
4.5.5	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. - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new land acquired in areas inhabited by communities in voluntary isolation. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
<b>Criterion 4.6:</b> 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	<b>(C)</b> 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 -	No new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable

4.6.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	No new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	No new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	No new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
<p><b>Criterion 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	No new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.7.2	<p><b>(C)</b> 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.</p> <p>- Critical (Major) compliance -</p>	No new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p>	No new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit.	Not Applicable

	- Minor compliance -	Consultation with relevant stakeholders conducted on-site confirmed the information.	
<b>Criterion 4.8:</b> 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 new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.8.2	<b>(C)</b> 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 new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 9 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable



<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
5.1.2	<b>(C)</b> 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 -	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
5.1.3	<b>(C)</b> 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 -	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
5.1.4	<b>(C)</b> 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 were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable

5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable																				
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable																				
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable																				
<b>Criterion 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.																							
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	West Palm Oil Mill received no FFB from the schemed smallholders. However consultation are made normally through meeting e.g. Meeting with stakeholders and FFB suppliers incorporated in the stakeholder meeting. Smallholders were invited to attend the stakeholder meeting for briefing on matters related to MSPO and RSPO certifications particularly on crop quality and field standards.  <table border="1" data-bbox="1218 1136 1832 1369"> <thead> <tr> <th></th> <th>Estate / mill</th> <th colspan="2">Date of meeting</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>West Estate</td> <td>11/11/2021</td> <td>5 smallholders</td> </tr> <tr> <td>2</td> <td>West Estate</td> <td>05/02/2020</td> <td>5 smallholders</td> </tr> <tr> <td>3</td> <td>West POM</td> <td>11/11/2021</td> <td>5 smallholders</td> </tr> <tr> <td></td> <td>West POM</td> <td>05/02/2020</td> <td>5 smallholders</td> </tr> </tbody> </table>		Estate / mill	Date of meeting		1	West Estate	11/11/2021	5 smallholders	2	West Estate	05/02/2020	5 smallholders	3	West POM	11/11/2021	5 smallholders		West POM	05/02/2020	5 smallholders	Complied
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5.2.2	<p>The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p> <p>- Minor compliance -</p>	<p>There were no smallholders crop received or processed by the mill hence criteria 5.2 is not applicable. However consultation are made normally through meeting e.g. Meeting with stakeholders and FFB suppliers incorporated in the stakeholder meeting. Smallholders were invited to attend the stakeholder meeting for briefing on matters related to MSPO and RSPO certifications particularly on crop quality and field standards.</p> <table border="1" data-bbox="1144 624 1760 858"> <thead> <tr> <th></th> <th>Estate / mill</th> <th colspan="2">Date of meeting</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>West Estate</td> <td>11/11/2021</td> <td>5 smallholders</td> </tr> <tr> <td>2</td> <td>West Estate</td> <td>05/02/2020</td> <td>5 smallholders</td> </tr> <tr> <td>3</td> <td>West POM</td> <td>11/11/2021</td> <td>5 smallholders</td> </tr> <tr> <td></td> <td>West POM</td> <td>05/02/2020</td> <td>5 smallholders</td> </tr> </tbody> </table>		Estate / mill	Date of meeting		1	West Estate	11/11/2021	5 smallholders	2	West Estate	05/02/2020	5 smallholders	3	West POM	11/11/2021	5 smallholders		West POM	05/02/2020	5 smallholders	Complied
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5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>There were no smallholders crop received or processed by the mill hence criteria 5.2 is not applicable.</p>	Not Applicable																				
5.2.4	<p><b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>There were no smallholders crop received or processed by the mill hence criteria 5.2 is not applicable.</p>	Not Applicable																				
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>There were no smallholders crop received or processed by the mill hence criteria 5.2 is not applicable.</p>	Not Applicable																				
<p><b>Principle 6: Respect workers' rights and conditions</b></p>																							
<p><b>Criterion 6.1:</b> Any form of discrimination is prohibited.</p>																							

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

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6.1.4	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. - Minor compliance -	Interviewed with the female employees in West Palm Oil Mill and estate confirmed that pregnancy testing is not conducted prior to work. They still will be able to offer for work if they are pregnant.	Complied
6.1.5	<b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	Gender committee is in place to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. Latest meeting dated 3/2/21, 21/6/21 and 25/11/21 carried out at West Estate. There was one (1) sexual harassment case reported last September 2021. Domestic inquiries (DI) initiated and independent panel has decided to terminate the said worker who did the harassment. Details of the investigation and chronology of events were made available for review. For West POM, gender committee meeting was carried out on 27/11/21, 15/7/21, 6/6/21 and 3/1/21. No gender related harassment issue reported so far at West POM.	Complied
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	There is not any discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting. Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste.	Complied
<b>Criterion 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	Sime Darby has sign the Collective Agreement with National Union of Plantation Workers (NUPW). Sample of employment contracts are reviewed and the agreements are signed in both English and home country language (i.e. Hindi, Bahasa Malaysia/Indonesia). Upon the foreign workers arriving to the estate, they will be inducted for the	Complied

		<p>terms and conditions of employment contract and briefed on the company's policies. This has confirmed by interviewed with the foreign workers.</p>	
<p>6.2.2</p>	<p><b>(C)</b> 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.          - Critical (Major) compliance -</p>	<p>Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are in compliance with the Employment Act 1955, Minimum Wages Order 2020, SOCSO Act 1969, EPF Act 1991, EIS Act 2017, and the MAPA/NUPW agreement.</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. Also confirmed via sampled payslips that wages were paid in compliance with national legal requirements. Salary deductions and overtime were in accordance with the relevant laws (SOCSO, EPF, EIS) and Labour Office permits. None of the sampled workers had any family members performing work.</p> <ul style="list-style-type: none"> <li>• Employment contracts template, "Employment Contract Extension for Foreign Worker (Peninsular – Indonesia/ Nepalese) – ECE1</li> <li>• Check-roll records, Estate/mill daily attendance report, CKRRD005</li> <li>• Employee Master List, SEMUA report.</li> </ul> <p>Approval for overtime limit extension to 130 hours has been obtained from Labour Department, Putrajaya. Ref: BHG.PU/9/134 Jld 12 (24) dated 25 December 2018. As for salary deduction permit, a few approvals obtained for;</p>	<p>Complied</p>

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		<p>- Insurance, motorcycle loan, cooperation deduction, ref: JTKS(E) 6/115. Jld 41-22 (2) dated 2/10/18.          Insurance (Great Eastern Life Assurance (M) Berhad), ref: BHG.PU/9/129 Jld 46 (19) dated 8/10/18.</p>	
<p>6.2.3</p>	<p><b>(C)</b> 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.          - Critical (Major) compliance -</p>	<p>Based on review of punch cards, workers' employment contracts and payslips, evidence was available that West POM and estate were able to demonstrate compliance with Employment Contracts 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSSO, EPF, EIS) and non-statutory deductions (e.g. union/NUPW, water, electricity bills, etc) in accordance with Labour Office permits. These permits are as detailed out under Indicator 2.1.1 above.</p> <p>Sampled during the audit were the following workers' employment contracts and payslips for the month of April 2021 (peak), January 2022 (low) and August 2021 (average/medium)</p> <p><u>West POM (15 workers sampled from total of 120 workers)</u></p> <p>Employee ID 70381, joined date 2/8/2011          Employee ID 85525, joined date 6/12/2012          Employee ID 100571, joined date 21/3/2014          Employee ID 143982, joined date 16/7/2018          Employee ID 6984, joined date 2/2/1984          Employee ID 7019, joined date 14/4/2004          Employee ID 6997, joined date 18/09/2006          Employee ID 7003, joined date 23/07/2008          Employee ID 160908, joined date 20/11/2020</p>	<p>Complied</p>

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		<p>Employee ID 158567, joined date 4/5/2020          Employee ID 162182, joined date 22/2/2021          Employee ID 159095, joined date 17/7/2020          Employee ID 159095, joined date 22/7/2020          Employee ID 163245, joined date 3/5/2021          Employee ID 159095, joined date 1/11/2021</p> <p><u>West Estate (28 workers sampled from total of 345 workers)</u></p> <p>Employee ID 143954, joined date 23/7/2018          Employee ID 147914, joined date 24/01/2019          Employee ID 76671, joined date 23/12/2011          Employee ID 107179, joined date 3/2/2014          Employee ID 111081, joined date 9/2/2015          Employee ID 143952, joined date 27/3/2018          Employee ID 111073, joined date 9/2/2015          Employee ID 162692, joined date 16/4/2021          Employee ID 162967, joined date 16/4/2021          Employee ID 150037, joined date 22/04/2021          Employee ID 126862, joined date 15/10/2016          Employee ID 6418, joined date 1/01/1990          Employee ID 6343, joined date 1/05/2005          Employee ID 6291, joined date 27/03/1995          Employee ID 6641, joined date 2/02/2009          Employee ID 116845, joined date 15/09/2015          Employee ID 108269, joined date 28/11/2014</p>	
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		<p>Employee ID 108272, joined date 28/11/2014          Employee ID 116857, joined date 15/09/2015          Employee ID 108273, joined date 28/11/2014          Employee ID 57867, joined date 27/11/2010          Employee ID 54519, joined date 6/09/2010          Employee ID 54527, joined date 7/9/2010          Employee ID 126390, joined date 13/10/2016          Employee ID 76681, joined date 27/12/2011          Employee ID 76679, joined date 27/12/2011          Employee ID 6260, joined date 12/2/1991          Employee ID 6615, joined date 28/7/2003</p>	
6.2.4	<p><b>(C)</b> 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.          - Critical (Major) compliance -</p>	<p>Workers Housing Management Procedure and 'OilPalmPal' Digital Housing Complaint System (OPP DHCS). Inter-office mail (Ref. No: UM/HSE/013/11/2021), dated 26<sup>th</sup> November 2021 from CEO Upstream Malaysia. General house rule is written under "<i>Peraturan Umum Kompleks Perumahan Pekerja</i>". EWC (Employee Welfare Committee) meeting carried out once every 3 monthly. The latest meeting was carried out in 13/3/2021 and focusing more on housing issue. Linesite inspection (housing complex/nest/community hall weekly inspections (PIOA)          West Estate – 30/1/22, 20/1/22, 12/1/22,5/1/22          West POM – 27/1/22, 19/1/22, 12/1/22, 4/1/22</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.          - Minor compliance -</p>	<p>There were sundry shops located in the estates compound and the estates are nearby to the nearest town. The workers can easily access to adequate, sufficient and affordable foods and goods. Price of goods were displayed at the sundry shops. Workers interview confirmed that they can easily purchase foods at the nearest shop or choose to go nearest town away from the estate by using their</p>	Complied

		transport until the main guard post and public transport to the nearest town.	
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><b>PROCEDURAL NOTE:</b></p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO</i></p>	<p>SOU 9 West has established the prevailing wage calculation to include all the in-kind benefits provided to the workers. Sampled the prevailing wages for benefit of Maintenance &amp; utilities – RM 109.17 for local workers and foreign workers, Public building maintenance and utilities – RM 10.95 and education – RM 23.24 for local workers. The prevailing wages is more than the Minimum Wage Order 2020.</p> <p>Sime Darby Plantation Berhad – SOU9 West POM has provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. It includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. The payslip sighted in clause 6.2.1 showed that the salary received complied with the minimum wage order 2022 and the decent living wage set up by the group which is foreign worker is RM1,959.07/worker and local RM1,792.07/worker.</p> <p>Note: Until housing basket can be determine (work in progress-data type need to pull from various departments and further segregated), in the interim SDP will refer to CA amount of RM125.</p>	Complied

	<p>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).</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"> <li>- Updated assessment on prevailing wages and in-kind benefits</li> <li>- There is annual progress on the implementation of living wages</li> <li>- 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</li> <li>- 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.</li> </ul> <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>Employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.2.2 above. No casual, temporary and day labour employed within all operating units within SOU 9</p>	Complied
<p><b>Criterion 6.3:</b> 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><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:          We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> <li>Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively.</li> </ul> <p>During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union.</p>									
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Trade union meeting carried out at each respected operating unit were verified. The meeting involved the representative from employer and employee. Date of meetings summarized as per below:</p> <table border="1"> <thead> <tr> <th>Estate/mill</th> <th>Date of meeting</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>West POM</td> <td>27/10/21</td> <td rowspan="2">Annual official meeting</td> </tr> <tr> <td>West Estate</td> <td>12/1/22</td> </tr> </tbody> </table>	Estate/mill	Date of meeting	Remarks	West POM	27/10/21	Annual official meeting	West Estate	12/1/22	Complied
Estate/mill	Date of meeting	Remarks									
West POM	27/10/21	Annual official meeting									
West Estate	12/1/22										
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on the worker’s interview, the selection of NUPW representative made from the election among the NUPW member without management interference. Foreign workers included in the committee formation and appointment letter sighted. The selection also based on the election meeting.</p>	Complied								
<p><b>Criterion 6.4:</b> Children are not employed or exploited.</p>											
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p>	Complied								

		<p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>- Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</li> <li>- Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> <li>- Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations.</li> <li>- Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities.</li> <li>- Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use.</li> <li>- Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees.</li> <li>- Protecting the Rights of Children: We seek to promote the wellbeing of children, and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography.</li> </ul>	
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		<p>Verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the clause 5.8 abolishment of child labour &amp; protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children.</p>	
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liaison &amp; Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</p>	Complied
6.4.3	<p><b>(C)</b> 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 the interview and employees master lists data, no young person below 18 years old employed within all operating units within SOU 9</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>Interview conducted on-site with sampled internal and external stakeholders confirmed that the information on no child labour policy and the negative effects of child labour were provided in appropriate languages and accessible to them.</p>	Complied
<p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> 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>The Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>- Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims.</li> </ul>	Complied

		<p>- Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation.</p> <p>The policy was communicated through the Gender Committee meeting conducted quarterly.</p>	
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 9 has implemented Social Policy, Gender Policy and Social &amp; Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Briefing of the policies was conducted during morning muster and the policies was displayed at the notice board outside the office.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>In West Estate, the assessment for new needs for new mother was conducted by Gender Committee. There were new needs as sampled below:</p> <p>27/11/21: Request for time-off to breast feed.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has developed Gender Committee Handbook, First Edition 2014 for implementation framework and guidelines where grievance reporting procedure for gender was developed. The new Term of Reference for Gender Representative and Gender Committee, dated March 2021 has been introduced to improve on the implementation of gender related activities in Sime Darby Plantation.</p> <p>Any cases must be reported to Social &amp; Environment Projects Unit of the PSQM Department. Incident report template was established. Flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008 was implemented as well. Initial negotiation between the management and the dispute parties should be taken within two</p>	Complied

		<p>weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in <a href="http://www.simedarbyplantation.com/corporate/governance/whistleblowing">http://www.simedarbyplantation.com/corporate/governance/whistleblowing</a>. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p>	
<p><b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>The recruitment cost was declared by the labour agent from source country for the applicable fees. Sampled for PT Wira Karitas &amp; PT Cahaya Lombok for Indonesia effective date on 22/04/2019 (RM 1,505.00) and Agensi Pekerjaan Dashan International Sdn Bhd for India (RM1,870 – Kolkata, Chennai – RM 1,670) for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent.</p> <p>Passport was kept by the management voluntarily or they can keep it by themselves. There is agreement letter signed by worker and employer on the safekeeping passport at office. If the workers want to obtain the passport for own usage, they can anytime request for it. Passport lockers are provided for those who want to keep their own passport.</p> <p>There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia and India was same with the employment contract signed between worker and estate/mill.</p>	<p>Complied</p>



		<p>Based on the workers interview, the overtime was given voluntarily if any work offered. The termination of service clearly stated that the termination of employment if:</p> <ol style="list-style-type: none"> <li>1. The company is not satisfied with your performance</li> <li>2. You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term.</li> <li>3. You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime.</li> <li>4. You have breached any express or implied terms of your employment.</li> <li>5. Fail medical examination based on FOMEMA result.</li> </ol>	
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.          - Critical (Major) compliance -</p>	<p>SDPSB has implemented a Sime Darby's Human Rights Charter on where they committed as below:</p> <ol style="list-style-type: none"> <li>a. Providing equal opportunity</li> <li>b. Respecting freedom of association</li> <li>c. Eradicating any form of exploitation</li> <li>d. Ensuring favorable working conditions</li> <li>e. Enhancing Safety and Health</li> </ol> <p>They also provided awareness and training to all the foreign workers for them to understand their responsibility in respect of human rights as included in the Group Sustainability Policy on 18/11/21 at West Estate.</p>	Complied
<p><b>Criterion 6.7:</b> 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><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers.</p>	<p>Both operating units have formed an OSH Committee in the respective mill and estate to address all issues associated to Health</p>	Complied

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	<p>Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>and Safety in the operating units. The OSH Organisation Charts were available and displayed at the workstations.</p> <p>1. <u>West POM</u></p> <p>The Mill Manager Mr. Zalizan Bin Mohd Tahir has been appointed as the chairman of the OSH Committee in the mill as stated in the appointment letter dated 01/11/2021 undersigned by the Regional CEO, Central East Region.</p> <p>2. <u>West Estate</u></p> <p>The Estate Manager, Mr. Md Rapit Bin Suman as the chairman of the OSH Committee as stated in the appointment letter dated 01/11/2021 undersigned by the Regional CEO, Central East Region.</p> <p>OSH Committee of the respective operating units conducts regular OSH Meetings to address all issues related to OSH in the operating units. Workplace Inspections are conducted prior to the OSH Meeting.</p> <p>1. West POM has conducted regular OSH Meetings and Meeting Minutes were available for verification. The meetings were sighted to be conducted on 29/11/2021 (04-2021), 22/09/2021 (03-2021), 11/06/2021 (02-2021) and 15/04/2021 (01-2021).</p> <p>West Estate conducted regular OSH Meetings in the estate. The meeting minutes were available for verification dated 29/12/2021 (04-2021) and 24/09/2021 (03-2021).</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>Emergency Response Plans and Procedures were available in the estates and mills to address potential emergencies such as Flood, Fire, Chemical Spillage, Poisoning, Earthquake/landslide, Accidents, Storm and Wild/ Poisonous Animal Attacks. The plans have been posted at notice boards in the mills and estates and communicated to the workers. Emergency contact numbers have been posted at the notice boards and provided to the workers as well. Interview</p>	<p>Complied</p>

	<p>- Minor compliance -</p>	<p>with the workers such as mandores and store attendants indicated that the workers are aware on the available emergency response plans. Trainings were conducted in the mill and estates to provide awareness to the workers on emergency responses. The trainings were sighted as below.</p> <ol style="list-style-type: none"> <li>1. <u>West POM</u> Emergency Evacuation Training was conducted at West POM on 27/07/2020.</li> <li>2. <u>West Estate</u> Fire Drill and Fire Extinguisher Training was conducted on 13/01/2022.</li> </ol> <p>First aiders were present in the operating units. They have been trained and obtained certificates as the PIC to address first aid in the operating units. Visit to the mill and estates indicated each station and gangs were equipped with first aid kits. Interview with the respective first aid holders indicated that they were well aware on the methods to use the items in the first aid boxes. The boxes are regularly monitored by the mill and estate Hospital Assistants to replenish the used items and replace expired items. Records of items used were also maintained and available in the boxes.</p> <ol style="list-style-type: none"> <li>1. <u>West POM</u> First Aid Training conducted on 03/02/2021 in the mill.</li> <li>2. <u>West Estate</u> First Aid Training conducted on 25/01/2022.</li> </ol> <p>Accident records were maintained in the estate and available for verification.</p>	
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		<p>1. <u>West POM</u></p> <p>Accident records were available and maintained by the mill. There was no accident reported for the year 2022 in the mill.</p> <p>For the year 2021 there were a total of 4 accident cases in the mill. The JKPP 6 forms for the mentioned accidents have been submitted to DOSH and available for verification. The JKPP 8 form for the year ending 2021 was submitted to DOSH as well on 29/01/2022 and available for verification.</p> <p>2. <u>West Estate</u></p> <p>Accident records were available and maintained by the estate. There were 1 accident reported for the year 2022 in the estate.</p> <p>For the year 2021 there were a total of 7 accident cases in the estate. The JKPP 6 forms for the mentioned accidents have been submitted to DOSH and available for verification. The JKPP 8 form for the year ending 2021 was submitted to DOSH as well on 04/01/2022 and available for verification.</p> <p>For the year 2021 there were a total of 7 accident cases in the estate. The JKPP 6 forms for the mentioned accidents have been submitted to DOSH and available for verification. The JKPP 8 form for the year ending 2020 was submitted to DOSH as well on 07/01/2022 and available for verification.</p>	
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang, Harvesting Gang and Manuring Gang and visit to the stores of the estate and mill, it was sighted that all required appropriate PPEs were worn by the personals.</p>	Complied

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		<p>The estate has well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p>																									
<p>6.7.4</p>	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees. The mill and estate have their own dispensary where all workers are able to obtain medical care borne by the operating unit. Severe sickness or injuries are referred to government hospitals or clinics which are also borne by the operating units. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for mill and all estate visited as below.</p> <table border="1" data-bbox="1137 810 1928 1200"> <thead> <tr> <th>Operating Units</th> <th>Month</th> <th>Total Workers</th> <th>Amount (RM)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">West POM</td> <td>Nov 2021</td> <td>127</td> <td>RM 5,122.40</td> </tr> <tr> <td>Dec 2021</td> <td>123</td> <td>RM 5,434.10</td> </tr> <tr> <td>Jan 2022</td> <td>124</td> <td>RM 4,877.50</td> </tr> <tr> <td rowspan="3">West Estate</td> <td>Nov 2021</td> <td>417</td> <td>RM 14,032.50</td> </tr> <tr> <td>Dec 2021</td> <td>413</td> <td>RM 18,313.50</td> </tr> <tr> <td>Jan 2022</td> <td>391</td> <td>RM 13,566.20</td> </tr> </tbody> </table>	Operating Units	Month	Total Workers	Amount (RM)	West POM	Nov 2021	127	RM 5,122.40	Dec 2021	123	RM 5,434.10	Jan 2022	124	RM 4,877.50	West Estate	Nov 2021	417	RM 14,032.50	Dec 2021	413	RM 18,313.50	Jan 2022	391	RM 13,566.20	<p>Complied</p>
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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 641"> <thead> <tr> <th rowspan="2">Certification Unit</th> <th colspan="2">2020</th> <th colspan="2">2021</th> <th colspan="2">2022</th> </tr> <tr> <th>Case</th> <th>LTA</th> <th>Case</th> <th>LTA</th> <th>Case</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>West POM</td> <td>3</td> <td>26</td> <td>4</td> <td>180</td> <td>-</td> <td>-</td> </tr> <tr> <td>West Estate</td> <td>7</td> <td>32</td> <td>7</td> <td>60</td> <td>1</td> <td>3</td> </tr> </tbody> </table>	Certification Unit	2020		2021		2022		Case	LTA	Case	LTA	Case	LTA	West POM	3	26	4	180	-	-	West Estate	7	32	7	60	1	3	Complied
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**Principle 7: Protect, conserve and enhance ecosystems and the environment**

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

7.1.1	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -</p>	<p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Barn owls Tyto Alba has been introduced for biological control of rats. Barn owl boxes are constructed at the rate of 1 box to 10ha. Census records show that there was minimal outbreak of leaf eating pest. Although there have been minimal outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators and further reduce the outbreak. The estates have planted beneficial plants such as Cassia cobanensis and Turnera subulata and Antigonon leptopus.</p> <p><u>West Estate</u></p> <ol style="list-style-type: none"> <li>Continuous planting of beneficial plants at immature and replanting fields.</li> <li>Planting of beneficial plants at areas prone to bagworm attacks.</li> </ol>	Complied
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		<p>3. Training on Barn Owl Census and Occupancy.</p> <p>4. Installation of Barn Owl Box to achieve target ration of 1:10 Ha. Fix bird perch together with Barn Owl Boxes.</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 estate.</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 estate.</p>	Complied
<p><b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 01.07.2011. Selected products are specific to the target pest, weed and disease.</p>	Complied

7.2.2	<p><b>(C)</b> 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 used for 2020 and 2021 as below: -</p> <table border="1" data-bbox="1137 539 1921 1219"> <thead> <tr> <th>Month</th> <th>2020</th> <th>2021</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>0.04</td> <td>0.987</td> </tr> <tr> <td>Feb</td> <td>0.11</td> <td>0.884</td> </tr> <tr> <td>Mar</td> <td>0.09</td> <td>0.697</td> </tr> <tr> <td>Apr</td> <td>0.06</td> <td>0.374</td> </tr> <tr> <td>May</td> <td>0.11</td> <td>1.133</td> </tr> <tr> <td>Jun</td> <td>0.04</td> <td>1.193</td> </tr> <tr> <td>Jul</td> <td>0.16</td> <td>0.776</td> </tr> <tr> <td>Aug</td> <td>0.17</td> <td>0.161</td> </tr> <tr> <td>Sep</td> <td>0.12</td> <td>0.173</td> </tr> <tr> <td>Oct</td> <td>0.20</td> <td>0.584</td> </tr> <tr> <td>Nov</td> <td>0.06</td> <td>0.374</td> </tr> <tr> <td>Dec</td> <td>0.04</td> <td>0.071</td> </tr> </tbody> </table>	Month	2020	2021	Jan	0.04	0.987	Feb	0.11	0.884	Mar	0.09	0.697	Apr	0.06	0.374	May	0.11	1.133	Jun	0.04	1.193	Jul	0.16	0.776	Aug	0.17	0.161	Sep	0.12	0.173	Oct	0.20	0.584	Nov	0.06	0.374	Dec	0.04	0.071	Complied
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7.2.3	<p><b>(C)</b> 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 estate has 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>	Complied																																							



		Sighted during the site visit at the estate, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas.  Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	There is no evidence of prophylactic use of pesticides in the estate.	Complied
7.2.5	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. The due diligence refers to: a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. - Minor compliance -	Sighted in the Chemical Registers showed that only class III & IV chemicals were used at the estate. During the site visit to the chemical store it was justified that there were only class II, III and IV chemicals being used. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead. Monocrotophos was eliminated and in its place, Acephate is used.	Complied
7.2.6	<b>(C)</b> 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).	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	Complied

	<p>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>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> <ul style="list-style-type: none"> <li>a. Maintenance and Usage of Inter Palm by MyCrop – 26/10/2021.</li> <li>b. Geo-I Spraying Training – 16/11/2021</li> <li>c. PPE &amp; Spraying Technique Training – 20/10/2020</li> <li>d. Maintenance and Usage of Inter Palm by MyCrop – 05/06/2020.</li> </ul>	
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation 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>The procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established.</p> <ul style="list-style-type: none"> <li>a) Collection of SW is made by Sime Kubota Sdn Bhd licensed vendor registered with DOE.</li> <li>b) The clinical waste SW 404 is disposed to Kualiti Alam Sdn Bhd</li> <li>c) Empty containers were tripled rinsed, pierced and delivered to a registered recycler company M/s SS Setia Enterprise by DOE and Jabatan Pertanian.</li> </ul>	Complied

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			Date	Empty container	Ally bottle	Cartoon Boxes	Spraying Pump	
			1	01/02/20	126 units	150 kg	120 kg	3 units
			2	18/12/20	535 units	-	-	-
			3	9/1/2021	147 units	43 kg	-	-
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	No aerial spraying for pesticide were done in the estate.						Complied
7.2.10	<p><b>(C)</b> 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 were conducted in the estates based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.</p> <p><u>West Estate</u></p> <p>Medical Surveillance is proposed to be conducted for 77 estate workers exposed to chemicals on 10/02/2022 at Ukhwah Medic Sdn Bhd.</p> <p>Medical Surveillance was previously conducted for 36 workers in the estate on 22/06/2021 at Klinik Hartati. The results indicated that all workers were fit to work with normal results.</p>						Complied
7.2.11	<p><b>(C)</b> 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>	West Estate has prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Gender Policy						Complied

		<p>and Occupational Safety and Health Policy signed by the Managing Director on January 2015.</p> <p>It was sighted during the visit to the stores there were signages stating that pregnant and breast-feeding women are not allowed to enter the chemical stores.</p> <p>Interview with the female sprayers indicated that they are aware that pregnant and breast-feeding women are prohibited from engaging with chemical related works.</p>													
<p><b>Criterion 7.3:</b> 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>SOU 09 West Mill and Estate had identified all wastes and sources of pollution. The Waste Management Action Plan FY 2022 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estate and mill operations were:</p> <table border="1" data-bbox="1137 874 1921 1204"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>sources from boiler stack (smoke and particulate), vehicle &amp; generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td> </tr> <tr> <td>2</td> <td>Water</td> <td>cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) &amp; boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>Land</td> <td>scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.</td> </tr> </tbody> </table> <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2022. The waste generated from the mill/estate operations as shown below;</p>		Receptor	Sources	1	Air	sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG	2	Water	cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	Land	scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.	<p>Complied</p>
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1	Air	sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG													
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3	Land	scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.													

		Type of waste	Details		
		1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	
		2	Domestic waste	rubbish from the mill complex and employees' quarters	
		3	Industrial waste	Fibre, palm kernel shell, boiler ash, scrap iron	
		4	Sewage	Sewage from housing/office complex	
		The pollution identified from the mill activities			
		Type of waste	Details		
		1	Black smoke	Emission from Boilers	
		2	Odour & gases	Activities from the effluent treatment	
		3	Leakage of lubricant	Storage & vehicle maintenance	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	<p>In West POM and the estate in SOU 9 procedure SD/SDP/PSQM (ESH)/203- EN1 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <p>a) Management and disposal of wastewater 2022 has been established compiled by Assistant Engineer.</p> <p>b) Waste Management Plan 2022 has been established prepared by QA and verified by the Assistant Engineer in Jan 2022. The management Plan for 2022 has yet to be finalised the source and disposal method of scheduled waste, domestic waste and industrial waste.</p> <p>c) Based on Environmental Impact Evaluation (file no: SM/5.2/EIE) and Environment Aspect and Impact Identification (file no: SM/5.2/EAI) improper disposal of clinical items will be impact on</p>			Non-compliance

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- community, depletion of natural resources and land contamination.
- d) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.
  - e) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is disposed to the following vendors registered with DOE Sime Kubota and SDI.

	Date	SW409	SW322	SW410	SW305
WPOM	30/12/20	0.150	0.700	0.127	0.400
WPOM	23/07/21	0.144	0.770	0.077	0.600
	Date	SW404	SW410	SW410	SW305
West E	26/2/20	-	14 pcs	3 kg	40 L
West E	14/5/20	-	12 pcs	0.5 kg	33L
West E	08/10/20	-	12 pcs	3 kg	33L
West E	28/5/21	-	35 pcs	-	240 L
West E	29/1/22	8.5 kg	-	-	-
West E	3/11/21	5.2 kg	-	-	-

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The CU scheduled waste is disposed to the following vendors registered with DOE. Letter from DOE dated 06/9/2011 for the approval was sighted and verified.

West POM has written to DOE on the delay in disposal via email and letter dated 08/2/2022 on the date deferment from 28/01/2022 to 07/3/2022 for a consignment of 1.087 mt which is due on 23/07/21 with reason of Kualiti Alam inability to accept due to empty slot as explained in email dated 07/2/2022.

	Date	SW Buyers/Vendor
West POM	30/4/22	Kualiti Alam Sdn Bhd
West Estate	30/4/22	Kualiti Alam SB/Sime Kubota Sdn Bhd

Empty containers were despatched to licensed buyer namely *SS Setia Teknologi Enterprise* registered with DOE dated 24/10/2018 and *Jabatan Pertanian* via letter dated 07/12/2015. Records of despatches by West Estate sighted as follows;

	Date	Empty container	Ally bottle	Cartoon Boxes	Spraying Pump
1	01/02/20	126 units	150 kg	120 kg	3 units
2	18/12/20	535 units	-	-	-
3	9/1/2021	147 units	43 kg	-	-

Records of domestic waste disposal to MD Kuala Langat were sighted and verified. Collection dates dated 03/2/22, 01/2/22 on average 2x to 3x /week.

		07/02/2022 West Estate - During the site visit at P96A1 harvesting operations a harvester was found using an empty Ally container for storage of personnel belonging attached in the motorcycle basket. <i>As such a minor NC was raised.</i>	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	There was no land preparation in SOU 9 Mill and Estates by burning ever since SDB practiced zero burning as per the policy in: a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation b) Carbon Policy SDP has a policy of no open burning. As advocated, the estate practiced zero burning. In the replants visited during the audit in the Estate, 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.	Complied
<b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	Leaf nutrient analysis is commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf analysis and leaf sampling is conducted annually. The foliar sampling and soil analysis reports by the company's agronomist were available at estate during the audit assessment. - West Estate Soil Analysis (Test Report No: S62/2018), Report Date: 12/09/2018. Sighted the Agronomist report for the year 2021, conducted on 25/08/2021, prepared by R&D Department Sime Darby Plantation Berhad for all sample Estates. The report covers the following aspect: Introduction, Rainfall, FFB Yield, Palm Nutritional Status / Observation, Field observation /	Complied



		<p>Comments, Manuring history, Fertilizer recommendation, Fertilizer Analysis, Field observation and Agronomic matters.</p> <p>The agronomist report also emphasized on-field best practices and physical conditions such as palm appearance, canopy size and vigour, canopy colour and vigour, palm circle and inter-row condition. Nutrients assessed were Na, N, P, K, Ca, Mg, B (PPM).</p>																															
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>West Estate operate in accordance with the Agriculture Manual and standard operating procedures. The practices are consistently monitored by estate operation management and the regional office. The recommendations for improvements are given to maintain sustainable practices. Leaf analysis and foliar sampling will be monitored on yearly basis. Variable dosage recommendation was given by the agronomist for fertilizer input for West Estate.</p>	Complied																														
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>West Estate visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of compost. In addition, during replanting, palms were felled, chipped, windowed and left to decompose. Records showed that the estates had applied EFB at 35 tons/ha and records showed that EFB metric ton in 2021 was as follows:</p> <table border="1" data-bbox="1146 1104 1718 1383"> <thead> <tr> <th></th> <th>Field no</th> <th>Ha</th> <th>Mt</th> <th>Month</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>08A</td> <td>26.91</td> <td>949.51</td> <td>Sept/Nov</td> </tr> <tr> <td>2</td> <td>05A</td> <td>47.74</td> <td>1608.5</td> <td>Aug/Nov</td> </tr> <tr> <td>3</td> <td>09H</td> <td>29.31</td> <td>903.28</td> <td>Oct/Nov</td> </tr> <tr> <td>4</td> <td>09E</td> <td>51.81</td> <td>1868.0</td> <td>July</td> </tr> <tr> <td>5</td> <td>11A</td> <td>77.19</td> <td>2364.</td> <td>Nov/Dec</td> </tr> </tbody> </table>		Field no	Ha	Mt	Month	1	08A	26.91	949.51	Sept/Nov	2	05A	47.74	1608.5	Aug/Nov	3	09H	29.31	903.28	Oct/Nov	4	09E	51.81	1868.0	July	5	11A	77.19	2364.	Nov/Dec	Complied
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		6	06C	65.83	3231.9	April/Dec																						
		7	05C	90.78	2246.1	Jan/Mac																						
		8	06A1	65.15	27398	May/Nov																						
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	<p>Fertilizers in all West Estate were applied according to agronomist recommendation. The records have the information about application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. Types of fertilizer applied were straight and mixture. The records were maintained and updated accordingly. Verification of various documents in all sample Estates such as agronomist report, annual manuring program and store issuance records shown that the inputs of fertilizers to the field were accurate. Sighted the application data for West Estate as below.</p> <p><u>West Estate</u></p> <p>1. Field 2021C; Total Ha: 42.02 Ha; Fertiliser: CCM 65; Total Bags: 74 (0.50 kg); Programme: Jan 2022; Application Date: 16/12/2021.</p> <p>a. Field 2015C; Total Ha: 61.90 Ha; Fertiliser: NKC2; Total Bags: 724 (36.208 mt); Programme: Jan - Mar 2022; Application Date: 20 - 22/01/2022.</p>						Complied																				
<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.																												
7.5.1	<b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. The soil series in West Estate were classified as follows</p> <table border="1"> <thead> <tr> <th>Soil series</th> <th>Carey</th> <th>Jawa</th> <th>Jugra</th> <th>Linau</th> </tr> </thead> <tbody> <tr> <td>%</td> <td>30.55</td> <td>21.25</td> <td>27.45</td> <td>1.67</td> </tr> <tr> <th>Soil series</th> <th>Sedu</th> <th>Selangor</th> <th>Tualang</th> <th>Nagor</th> </tr> <tr> <td>%</td> <td>1.63</td> <td>9.63</td> <td>5.98</td> <td>2.03</td> </tr> </tbody> </table>						Soil series	Carey	Jawa	Jugra	Linau	%	30.55	21.25	27.45	1.67	Soil series	Sedu	Selangor	Tualang	Nagor	%	1.63	9.63	5.98	2.03	Complied
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		There were no other problem soils (e.g. podzols and acid sulphate soils) on SOU 9.																															
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 SDPB Estates, West Estate 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> <ul style="list-style-type: none"> <li>a) Slope &amp; River Protection Policy</li> <li>b) Buffer Zone &amp; 25-degree slope and in item 8 Section 4</li> <li>c) Land Preparation for Terracing in ARM Manual.</li> </ul> <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, 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 <i>Mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>Neprolepis biserrata</i> in the inter rows were sighted during the visit. The slope maps were provided by the R&amp;D Precision Agriculture Unit with details as follows;</p> <table border="1" data-bbox="1144 1043 1704 1278"> <thead> <tr> <th></th> <th><i>Topography</i></th> <th>%</th> <th></th> <th><i>Topography</i></th> <th>%</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0-2</td> <td>100</td> <td>4</td> <td>12-20</td> <td>0</td> </tr> <tr> <td>2</td> <td>2-6</td> <td>0</td> <td>5</td> <td>20-25</td> <td>0</td> </tr> <tr> <td>3</td> <td>6-12</td> <td>0</td> <td>6</td> <td>&gt;25</td> <td>0</td> </tr> <tr> <td></td> <td>Total</td> <td></td> <td></td> <td></td> <td>100</td> </tr> </tbody> </table>		<i>Topography</i>	%		<i>Topography</i>	%	1	0-2	100	4	12-20	0	2	2-6	0	5	20-25	0	3	6-12	0	6	>25	0		Total				100	Complied
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	Total				100																												

7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	This compliance being addressed in the " <i>Slope and River Protection</i> " signed by the CEO dated Jan 2015 stating the following among others;  "Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly".	Complied
<b>Criterion 7.6:</b> 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	<b>(C)</b> 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 -	There is no peat soil or soil categorized as marginal or fragile soil at all 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 West Estate. As addressed in the Sime Darby Plantation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2:  a) Protect and enhance forest: "We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:  i. No new development of peat areas, regardless of depth or location.  ii. We will seek to rehabilitate existing plantings on peats where possible.	Complied
7.6.3	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 the estate. Topographic contour map are also available which are both used to manage the drainage and road works in the estate.	Complied

<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p><b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil at West Estate. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.	Not Applicable
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p><b>PROCEDURAL NOTE:</b>            Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil at West Estate. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.	Not Applicable
7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil at West Estate. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.	Not Applicable
7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The water and ground cover management programme is documented in the Sime Darby Agricultural Reference Manual (Water Management in Coastal and Peat lands) issued on 01.07.2011. Details are described in 7.8.1. individual estates and mill had their respective water management plan mainly to monitor among others the following;</p> <ul style="list-style-type: none"> <li>a) Monitor the quality of main water inlet/outlet for pollutants from estate's operations.</li> <li>b) Contingency during water shortage.</li> <li>c) Field water management - side pit construction</li> <li>d) Adequate field drains</li> <li>e) Reuse/recycle waste water.</li> <li>f) Peat soil water management</li> </ul>	Complied

7.7.5	<p><b>(C)</b> 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 reilitated 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>	There is no peat soil or soil categorized as marginal or fragile soil in West Estate.	Not Applicable
7.7.6	<p><b>(C)</b> 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>	There is no peat soil or soil categorized as marginal or fragile soil in West Estate.	Not Applicable
7.7.7	<p><b>(C)</b> 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 Reilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil in West Estate.	Not Applicable

**Criterion 7.8:** Practices maintain the quality and availability of surface and groundwater.

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<p>7.8.1</p>	<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"> <li>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</li> <li>b) Workers have adequate access to clean water.</li> </ul> <p>- Minor compliance -</p>	<p>Both the Mill and Estate had established its Water Management Plan for year 2022 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"> <li>a) implementation of rain water harvest,</li> <li>b) construction of water gate for effective management of field drains,</li> <li>c) establishment of <i>Mucuna bracteata</i> to prevent erosion,</li> <li>d) side drain at field road to control water, frond stacking,</li> <li>e) Enhancement of ground vegetation at bare ground area.</li> </ul> <p>The water sources are as shown below;</p> <table border="1" data-bbox="1137 813 1926 1367"> <thead> <tr> <th></th> <th>Water sources</th> <th>usage</th> <th>Monitoring &amp; measurement</th> <th>Freq</th> <th>PIC</th> <th>Review status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SYABAS</td> <td>Purchased for domestic consumption</td> <td>Monitoring water supply</td> <td>Mthly</td> <td>AM Mgr</td> <td>Liaison with Authority</td> </tr> <tr> <td>2</td> <td>Rain water</td> <td>Domestic use Workshop Chemical mixing</td> <td>Rain fall data</td> <td>On-going</td> <td>AM Mgr</td> <td>Water harvesting for general washing</td> </tr> <tr> <td>3</td> <td>Water tank</td> <td>Emergency water supply</td> <td>-</td> <td>-</td> <td>AM Mgr</td> <td>Request water supply from other estates</td> </tr> </tbody> </table>		Water sources	usage	Monitoring & measurement	Freq	PIC	Review status	1	SYABAS	Purchased for domestic consumption	Monitoring water supply	Mthly	AM Mgr	Liaison with Authority	2	Rain water	Domestic use Workshop Chemical mixing	Rain fall data	On-going	AM Mgr	Water harvesting for general washing	3	Water tank	Emergency water supply	-	-	AM Mgr	Request water supply from other estates	<p>Complied</p>
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		<p>The contingency plan during water shortage</p> <table border="1"> <thead> <tr> <th data-bbox="1137 459 1171 483"></th> <th data-bbox="1171 459 1361 483">Area/incident</th> <th data-bbox="1361 459 1675 483">Action steps</th> <th data-bbox="1675 459 1798 483">PIC</th> <th data-bbox="1798 459 1921 483">status</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 483 1171 778">1</td> <td data-bbox="1171 483 1361 778">Water shortage/ prolonged dry season</td> <td data-bbox="1361 483 1675 778">to obtain water from local authority /estate catchment to train/educate staff/workers to conserve water to seek assistance from local authority to obtain treated water supply from mill's WTP</td> <td data-bbox="1675 483 1798 778">Manager AM/Mill Engineer</td> <td data-bbox="1798 483 1921 778">As and when required</td> </tr> <tr> <td data-bbox="1137 778 1171 1042">2</td> <td data-bbox="1171 778 1361 1042">Severe water pollution/ Contamination</td> <td data-bbox="1361 778 1675 1042">to obtain water from local authority to train/educate staff/workers to conserve water to seek assistance from local authority to obtain treated water supply from mill's WTP</td> <td data-bbox="1675 778 1798 1042">Manager AM// Mill Engineer</td> <td data-bbox="1798 778 1921 1042">As and when required</td> </tr> <tr> <td data-bbox="1137 1042 1171 1281">3</td> <td data-bbox="1171 1042 1361 1281">Salt water intrusion</td> <td data-bbox="1361 1042 1675 1281">Flushing out water during dry &amp; low tide season Construction of screw gate to prevent entry into field drain Regular inspection during high tide to identify any tide gate and flap door.</td> <td data-bbox="1675 1042 1798 1281">Estate Mgmt</td> <td data-bbox="1798 1042 1921 1281">Schedule</td> </tr> </tbody> </table> <p>The Estate had implemented water managements plans which covered:</p>		Area/incident	Action steps	PIC	status	1	Water shortage/ prolonged dry season	to obtain water from local authority /estate catchment to train/educate staff/workers to conserve water to seek assistance from local authority to obtain treated water supply from mill's WTP	Manager AM/Mill Engineer	As and when required	2	Severe water pollution/ Contamination	to obtain water from local authority to train/educate staff/workers to conserve water to seek assistance from local authority to obtain treated water supply from mill's WTP	Manager AM// Mill Engineer	As and when required	3	Salt water intrusion	Flushing out water during dry & low tide season Construction of screw gate to prevent entry into field drain Regular inspection during high tide to identify any tide gate and flap door.	Estate Mgmt	Schedule	
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- 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.

Water management plan review date sighted on selective basis.

	Estate/Mill	Review date	Issues
1	West POM	13/01/2022	Nil
2	West Estate	03/01/2022	Nil

The water reduction plan is shown below;

	Issues/Areas	Action Steps	PIC	Status
1	Rain water collection	Large containers are to be placed at strategic locations to collect rain water The rainwater shall be recycled for washing heavy machinery	AM/Field staff	On-going
2	Leakage on plumbing system	Frequent inspection to detect leakage Fix any leakage	AM/Field staff	On-going
3	Water compartmentalization	To conserve level of soil moisture To minimize water stress during dry season	AM/Field staff	On-going
4	Handling of chemicals	To recycle water spillage while mixing of chemical at mixing area	AM/Field staff	On-going

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5	education	Avoid excessive usage during cleaning Close pipe to prevent water dripping	AM/Field staff	On-going
5	Re-streaming	Re stream from sterilizer condensate pit for dilution	Mill engineer	On-going

The Mill Identification & Management of Waste Water

	location	Wastewater produced	Treatment/containment	Reuse/recycle/disposal method
1	Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system
2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain
	Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain
3	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain
4	Lab	Cleaning water	Process drain	Monsoon drain
5	Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.

<p>7.8.2</p>	<p><b>(C)</b> 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>West Estate continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The buffer zones established are as follows:</p> <table border="1" data-bbox="1144 703 1756 979"> <thead> <tr> <th></th> <th><i>River width</i></th> <th><i>Buffer zone</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>&gt; 40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>&lt; 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the GSQM Unit with latest revision dated on 13/6/2011. The buffer zones identified at the estates are as similar in the HCV areas;</p> <table border="1" data-bbox="1137 1142 1787 1369"> <thead> <tr> <th></th> <th>West Estate</th> <th>HCV area</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Natural Ponds</td> <td>P08A</td> <td>4.79 ha</td> </tr> <tr> <td>2</td> <td>Fringe Mangroves</td> <td>P09G</td> <td>39.84 ha</td> </tr> <tr> <td>3</td> <td>Erosion control bund</td> <td>Entire perimeter</td> <td>-</td> </tr> <tr> <td>4</td> <td>Water catchment</td> <td>-</td> <td>0.60 ha</td> </tr> </tbody> </table>		<i>River width</i>	<i>Buffer zone</i>	1	> 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters		West Estate	HCV area	Remarks	1	Natural Ponds	P08A	4.79 ha	2	Fringe Mangroves	P09G	39.84 ha	3	Erosion control bund	Entire perimeter	-	4	Water catchment	-	0.60 ha	<p>Non-compliance</p>
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5	Water catchment	-	1.80 ha
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West Mill Water Analysis Parameter								
			29/10/2021			28/06/2021		
		unit	DAM	DG	DS	DAM	DG	DS
1	pH	6-9	6.5	6.4	6.8	8.4	6.5	7.0
3	BOD	Mg/l	5	2	<1	7	3	1
4	COD	Mg/l	48	176	2560	108	168	1040
	TS	Mg/l	776	755	358	230	628	757
5	SS	Mg/l	22	12	176	76	7	4
6	TN	Mg/l	11	10	8	7	2	2
7	AN	Mg/l	<1	<1	<1	4	<1	<1
8	O&G	Mg/l	2	5	3	-	-	-

Samples are taken by the mill management for detection of any pollution arising from the mill and estate activities. Water samples from the intake point and outlet are taken for analysis for detection of any contamination /quality effect to the water courses.

Among others management plan taken;

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

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		<p>There were no issues on the monthly water analysis for the sampling points. All units in mg/l except pH. <i>Ref DAM - Drain after mill / DG - Tide gate / DS - Discharge into sea.</i></p> <p>Site visit on 08/02/2022 field no P09G traces of spraying being made at entire row edge of main drain/watercourse leading to TG20 with onwards estuary flow to the outside sea. <i>As such an Major NC was raised.</i></p>																																																																									
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>Based on "Jadual Pematuhari" (license no 003180 valid till 30/06/2022) EPOM disposed effluent on land application in West Estate. Sighted quarterly report has been submitted to DOE by quarterly basis. Latest submission for to DOE on Jan 2022. Among of indicator were:</p> <table border="1" data-bbox="1144 802 1832 1359"> <thead> <tr> <th></th> <th>Oct – Dec 21</th> <th>STD</th> <th>8/10/21</th> <th>12/11/21</th> <th>8/12/21</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>-</td> <td>7.20</td> <td>6.50</td> <td>7.20</td> </tr> <tr> <td>2</td> <td>BOD mg/l</td> <td>5000</td> <td>637</td> <td>1480</td> <td>1955</td> </tr> <tr> <td>3</td> <td>A Nitrogen</td> <td>-</td> <td>212</td> <td>161</td> <td>162</td> </tr> <tr> <td>4</td> <td>Total N</td> <td>-</td> <td>250</td> <td>238</td> <td>250</td> </tr> <tr> <td>5</td> <td>Oil &amp; Grease</td> <td>-</td> <td>4.00</td> <td>20.00</td> <td>11.00</td> </tr> <tr> <td colspan="6"> </td> </tr> <tr> <th></th> <th>April-June 21</th> <th>STD</th> <th>09/4/21</th> <th>14/5/21</th> <th>10/6/21</th> </tr> <tr> <td>1</td> <td>pH</td> <td>-</td> <td>7.10</td> <td>7.30</td> <td>7.40</td> </tr> <tr> <td>2</td> <td>BOD mg/l</td> <td>5000</td> <td>2610</td> <td>1708</td> <td>1668</td> </tr> <tr> <td>3</td> <td>A Nitrogen</td> <td>-</td> <td>106</td> <td>62</td> <td>26</td> </tr> <tr> <td>4</td> <td>Total N</td> <td>-</td> <td>275</td> <td>183</td> <td>281</td> </tr> </tbody> </table>		Oct – Dec 21	STD	8/10/21	12/11/21	8/12/21	1	pH	-	7.20	6.50	7.20	2	BOD mg/l	5000	637	1480	1955	3	A Nitrogen	-	212	161	162	4	Total N	-	250	238	250	5	Oil & Grease	-	4.00	20.00	11.00								April-June 21	STD	09/4/21	14/5/21	10/6/21	1	pH	-	7.10	7.30	7.40	2	BOD mg/l	5000	2610	1708	1668	3	A Nitrogen	-	106	62	26	4	Total N	-	275	183	281	Complied
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.          - Minor compliance -</p>	<p>The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording detailed sampled (water usage m3/per mt of fresh fruit bunches (FFB) below;</p> <table border="1" data-bbox="1144 788 1637 1382"> <thead> <tr> <th></th> <th>Month</th> <th>2020</th> <th>2021</th> </tr> </thead> <tbody> <tr><td>1</td><td>Jan</td><td>1.40</td><td>1.22</td></tr> <tr><td>2</td><td>Feb</td><td>0.99</td><td>1.83</td></tr> <tr><td>3</td><td>Mac</td><td>1.09</td><td>1.00</td></tr> <tr><td>4</td><td>April</td><td>0.95</td><td>1.15</td></tr> <tr><td>5</td><td>May</td><td>1.03</td><td>1.19</td></tr> <tr><td>6</td><td>June</td><td>1.00</td><td>1.28</td></tr> <tr><td>7</td><td>July</td><td>1.09</td><td>1.06</td></tr> <tr><td>8</td><td>Aug</td><td>0.93</td><td>2.01</td></tr> <tr><td>9</td><td>Sept</td><td>0.97</td><td>1.10</td></tr> <tr><td>10</td><td>Oct</td><td>0.67</td><td>1.49</td></tr> <tr><td>11</td><td>Nov</td><td>0.96</td><td>1.40</td></tr> </tbody> </table>		Month	2020	2021	1	Jan	1.40	1.22	2	Feb	0.99	1.83	3	Mac	1.09	1.00	4	April	0.95	1.15	5	May	1.03	1.19	6	June	1.00	1.28	7	July	1.09	1.06	8	Aug	0.93	2.01	9	Sept	0.97	1.10	10	Oct	0.67	1.49	11	Nov	0.96	1.40	Complied
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12	Dec	1.12	2.14												
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<b>Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</b>															
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2022. The document was updated on Jan 2022. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1"> <thead> <tr> <th></th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Backhoe tractor</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>to ensure the vehicle engine is turn off during idle time to record vehicle activity which consume fuel</td> </tr> <tr> <td>2</td> <td>Van / Supervisory vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>to record vehicle activity in order to eliminate waste activity which consume fuel. to turn off vehicle engine during idle time.</td> </tr> </tbody> </table>		Target	Objective	Action plan	1	Backhoe tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	to ensure the vehicle engine is turn off during idle time to record vehicle activity which consume fuel	2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	to record vehicle activity in order to eliminate waste activity which consume fuel. to turn off vehicle engine during idle time.	Complied
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3	Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources
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The utilization of fossil fuel ratio in 2020 and 2021 are being monitored with records shown below with baseline of 1.75 L/FFB mt (estate) and 0.05 L/FFB mt (mill) respectively.

	WE 2020	WPOM 2020	WE 2021	WPOM 2021
	Diesel/FFB	Diesel/FFB	Diesel/FFB	Diesel/FFB
Jan	3.04	0.50	2.79	0.015
Feb	3.17	0.08	1.89	0.022
Mac	1.55	0.02	1.68	0.118
Apr	0.94	0.01	1.40	0.00
May	1.18	0.01	1.42	0.004
Jun	1.62	0.02	1.73	0.017
July	1.88	0.01	1.47	0.014
Aug	1.94	0.03	1.60	0.015
Sep	1.79	0.01	1.43	0.013
Oct	2.04	0.01	1.96	0.017
Nov	2.05	0.02	1.90	0.015



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Dec	2.22	0.02	2.02	0.331
<i>Total</i>	<i>181708</i>	<i>3962</i>	<i>168091</i>	<i>6790</i>

In conclusion the total consumption of both shell and fibre over the CPO production is at an average of 4.8. When the renewable energy consumption is maximized the utilization of non-renewable is reduced. Similarly, the estate records and monitors the diesel utilization of vehicles running.

Performance variation in view of several factors i.e.

- a) infrastructure of estates,
- b) community size / no of gen-sets,
- c) no. of vehicles / age of machine.
- d) Weather interference / crop production volume

There is no opportunity for the estates to capitalize the utilization of fibre/shell as part of their energy production in replacement of fossil fuel with the current technology limitation.

*West Mill*

A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2022, identified in the following

- a) Environmental Aspect Identification Summary FY 2022 reviewed accordingly.
- b) Environmental Impact Evaluation Summary FY 2022 reviewed accordingly.
- c) EIA was reviewed annually with recent being on 17/01/21. There were changes in 2020 for the new inclusion of ESP for the boiler emission quality enhancement (commissioned on Mac 2020) and Tech Grade Oil Production (installed on Jan 2020)

		The renewable energy usage & diesel consumption 2022 was established and monitored by monthly basis. Reduction plan and initiative for diesel usage – by maintenance of the boiler & machinery to ensure at optimum level, to monitor diesel usage, provide training to workers regarding reduce fuel and diesel usage for boiler. Diesel consumption for the mill as shown in the above table.	
<b>Criterion 7.10:</b> 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	<b>(C)</b> 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. - Critical (Major) compliance -	Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.  The emission value is recorded and calculated through the utilisation of RSPO’s Palm GHG Calculator ver. 4.	Complied
7.10.2	<b>(C)</b> 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). - Critical (Major) compliance -	Not applicable since no new development by the certification unit.	Not Applicable
7.10.3	<b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -	An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. (SM/5.2/EAI) and (SM/5.2/EIE) which covers estate and mill activities / operation. ‘Pollution Identification Environmental	Complied

Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:

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

West Mill has conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit.

The mill was also equipped with a Continuous Emission Monitoring System (CEMS).

The audit team has verified the condition of the CEMS during the audit.

The system was found to be in functional condition.

Data from the stack is connected online to DOE's office. Boiler smoke emission data are within the DOE limit.

		<p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent.</p> <p>'Pollution prevention plan and waste management action plan" – is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly. Among of action has been taken by CU were:</p> <p>Scheduled wastes – were disposed through Kualiti Alam Sdn Bhd and Sime Kubota Sdn Bhd</p> <p>Domestic wastes are disposed to local town municipal MDKL landfill outside the estate vicinity..</p> <p>Full compliance to zero burning practices</p>	
<b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>There was no evidence that fire had been used to prepare land for replanting in West Estate PR19/20 and PR22. No fire was used for waste disposal.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>There was no land preparation by burning ever since SDPB practice zero burning as per the policy in:</p> <p>a) EQMS-SOP-Section B2 - Under felling/clearing &amp; land preparation</p> <p>b) Carbon Policy</p> <p>The use of fire for waste disposal and for preparing land for oil palm cultivation or replanting was not practiced in the estate. From field visits (2019, 2020 &amp; 2021 Replants) and interviews with the workers there is no open burning being practiced in the estate The Group policy of "Zero open burning" has been enforced since July 2008. The operating units adhered to the policy of "Zero open burning" for any replanting. Furthermore, Sime Darby Plantation</p>	Complied

		<p>assigned 1 person based in HQ being in charge to detect any open fire in the Company's' fields using the Global Spot Watch. This is the measures taken by the organization to pledge towards zero open burning.</p>																					
<p>7.11.3</p>	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.          - Minor compliance -</p>	<p>Both the estate and the mill in SOU 09 held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure <i>Kertas Kerja Program Simulasi Kebakaran</i> dated 12/9/2019 and Fire Prevention and Control Measure. Therein containing</p> <ul style="list-style-type: none"> <li>a) Objective</li> <li>b) Activity and prevention.</li> <li>c) Function of Fire and Rescue Team</li> <li>d) Emergency Evacuation Plan / Drill</li> </ul> <p>All stakeholders being briefed in the respective stakeholders meetings in a brief agenda relating to fire prevention and issues relating to environmental.</p> <table border="1" data-bbox="1137 963 1756 1197"> <thead> <tr> <th></th> <th>Estate / mill</th> <th colspan="2">Date of meeting</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>West Estate</td> <td>11/11/2021</td> <td>98 participants</td> </tr> <tr> <td>2</td> <td>West Estate</td> <td>05/02/2020</td> <td>78 participants</td> </tr> <tr> <td>3</td> <td>West POM</td> <td>11/11/21</td> <td>98 participants</td> </tr> <tr> <td>4</td> <td>West POM</td> <td>05/02/20</td> <td>78 participants</td> </tr> </tbody> </table>		Estate / mill	Date of meeting		1	West Estate	11/11/2021	98 participants	2	West Estate	05/02/2020	78 participants	3	West POM	11/11/21	98 participants	4	West POM	05/02/20	78 participants	<p>Complied</p>
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**Criterion 7.12:** Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

7.12.1	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2). Hence, the requirement under this indicator does not apply.</p>	Not Applicable
7.12.2	<p><b>(C)</b> 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><b>PROCEDURAL NOTE:</b>          Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU 9 estates. Hence the current HCV assessment of the estates remains valid.</p> <p>a. The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU 9 estates. Hence, the requirement under this indicator does not apply.</p>	Complied
7.12.3	<p><i>Indicator is not applicable in Malaysia context</i></p>	-	Not Applicable
7.12.4	<p><b>(C)</b> 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</p>	<p>The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU 9 estates. Hence, the requirement under this indicator does not apply.</p>	Not Applicable

	<p>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>		
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>The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU 9 estates. Hence, the requirement under this indicator does not apply.</p>	Not Applicable
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>The HCV re-assessment was compiled by PSQM team on May 2016 for West Estate SOU 9. Thereafter being reviewed on October 2020. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <ul style="list-style-type: none"> <li>a) Overview of HCV assessment</li> <li>b) Description of assessment area <ul style="list-style-type: none"> <li>- Landscape context</li> <li>- biodiversity &amp; conservation values</li> <li>- ecosystem service / social &amp; cultural values</li> </ul> </li> <li>c) HCV criteria &amp; application to agriculture <ul style="list-style-type: none"> <li>- Visual observation &amp; supporting information</li> <li>- Wildlife in plantation</li> <li>- decision on HCV status</li> </ul> </li> <li>d) HCV management / Monitoring.</li> </ul>	Complied

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The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein. The HCV areas presence as identified by the West Estate within SOU 9 are given below;

	Area	Site	Ha	HCV Type
1	Natural Ponds	P08A	4.79	HCV 4
2	Fringe Mangroves	P09G	39.84	HCV 4
3	Hatters castle	P06A	1.12	HCV 6
4	Erosion Control Bund		53.64	HCV 4
5	Water catchment	-	0.60	HCV 4
6	Water catchment	-	1.80	HCV 4
	Total		101.79	

All areas were sighted and verified. HCV of no 4,5 and 6 above are re-categorized areas from the normal buffer zone category. Hectare for the re-categorized areas has not affected the others category including the planted areas. All the HCVs were maintained by SDP special projects whilst the mangrove areas are under the jurisdiction of the state government. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented. Map verification and site visit confirmed that West estate is surrounded by river/straits and villages. The HCVs, conservation areas/environmentally sensitive areas e.g. bund along the stretches of river/straits which passes bordering through the estate had been identified and being monitored.



<p>7.12.7</p>	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The CU management has established a standard monitoring document. Details provided include the following information;</p> <ul style="list-style-type: none"> <li>a) Area</li> <li>b) Field no and GPS coordinate</li> <li>c) Observation             <ul style="list-style-type: none"> <li>- Encroachment /sign of trespassing</li> <li>- Wildlife issues/conflicts/sighting</li> <li>- Pollution /erosion issues</li> </ul> </li> <li>d) Maintenance of signage / fence</li> </ul> <p>The monitoring being made by the AP during the security rounds in the estate complex. The field staff/Assistant also played a role in providing information during their daily rounds in the fields. Records furnished by the APs were sighted and verified.</p> <table border="1" data-bbox="1155 863 1910 1378"> <thead> <tr> <th></th> <th>Action steps</th> <th>Action Plan</th> <th>Date</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Inspection of HCV</td> <td>Continuous inspection and recommendation To liase with related agency</td> <td>On-going</td> <td>Estate mgmt</td> </tr> <tr> <td>2</td> <td>Protection or conservation &amp; monitoring of biodiversity area.</td> <td>To continuously collaborate with R&amp; D to monitor the status &amp; health of trees</td> <td>On-going</td> <td>Estate mgmt</td> </tr> <tr> <td>3</td> <td>Protection &amp; conservation of mangrove forests area.</td> <td>To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation.</td> <td>On-going</td> <td>Estate mgmt</td> </tr> </tbody> </table>		Action steps	Action Plan	Date	PIC	1	Inspection of HCV	Continuous inspection and recommendation To liase with related agency	On-going	Estate mgmt	2	Protection or conservation & monitoring of biodiversity area.	To continuously collaborate with R& D to monitor the status & health of trees	On-going	Estate mgmt	3	Protection & conservation of mangrove forests area.	To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation.	On-going	Estate mgmt	<p>Complied</p>
	Action steps	Action Plan	Date	PIC																			
1	Inspection of HCV	Continuous inspection and recommendation To liase with related agency	On-going	Estate mgmt																			
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		5	Rehabilitation & habitat enhancement	To participate in tree planting divers tree species to enhance the surrounding biodiversity.	On-going	Estate mgmt	
		6	Interface with animals	Raise awareness of HCV/RTE to employees Employees are taught not to disturbed/hunt wildlife. Liaison with <i>Jabatan Perhilitan</i> on wildlife encounter/discovery	On-going	Estate mgmt	
		7	Education and awareness	Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage No fishing/no hunting/no swimming	On-going	Estate mgmt	
7.12.8	<p><b>(C)</b> 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>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 9 estates. Hence, the requirement under this indicator does not apply.</p>					Not Applicable

**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2021** for **West POM** and supply base was calculated using the PalmGHG Calculator version 4.1. 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 2021 for West POM and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.34
PKO	1.34

Extraction	%
OER	20.55
KER	4.85

Production	t/yr
FFB Process	173,298.74
CPO Produced	35,610.50
PK Produced	8,396.47

Land Use	Ha
OP Planted Area	22,965.24
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>22,965.24</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	0.00	0.00	143,989.90	0.83	0.00	0.00	143,989.90	-
CO <sub>2</sub> Emission from fertilizer	0.00	0.00	9,009.91	0.05	0.00	0.00	9,009.91	-
NO <sub>2</sub> Emission	0.00	0.00	6,182.42	0.04	0.00	0.00	6,182.42	-
Fuel Consumption	0.00	0.00	62.98	0.00	0.00	0.00	62.98	-
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
<b>Sink</b>								
Crop Sequestration	0.00	0.00	-134,389.07	-0.78	0.00	0.00	-134,389.07	-
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>24,856.14</b>	<b>0.14</b>	<b>0.00</b>	<b>0.00</b>	<b>24,856.14</b>	<b>-</b>

*\*Note: Includes both estates and smallholders*

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**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	33,969.49	0.20
Fuel Consumption	23.82	0.20
Grid Electricity Utilization	0	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>33,993.31</b>	<b>0.20</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

Emissions	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

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

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

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Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.16
PKO	1.16

Extraction	%
OER	20.67
KER	5.12

Production	t/yr
FFB Process	152,575.01
CPO Produced	31,541.81
PK Produced	7,804.53

Land Use	Ha
OP Planted Area	14,681.24
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>14,681.24</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	0.00	0.00	74,684.71	0.49	0.00	0.00	74,684.71	-
CO <sub>2</sub> Emission from fertilizer	0.00	0.00	5,099.02	0.03	0.00	0.00	5,099.02	-
NO <sub>2</sub> Emission	0.00	0.00	3,427.30	0.02	0.00	0.00	3,427.30	-
Fuel Consumption	0.00	0.00	813.03	0.01	0.00	0.00	813.03	-
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
<b>Sink</b>								
Crop Sequestration	0.00	0.00	-70,359.79	-0.49	0.00	0.00	-70,359.79	-
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>13,664.28</b>	<b>0.09</b>	<b>0.00</b>	<b>0.00</b>	<b>13,664.28</b>	<b>-</b>

\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	29,907.29	0.20
Fuel Consumption	32.05	0.0
Grid Electricity Utilization	1,895.67	0.01
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>31,835.01</b>	<b>0.21</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

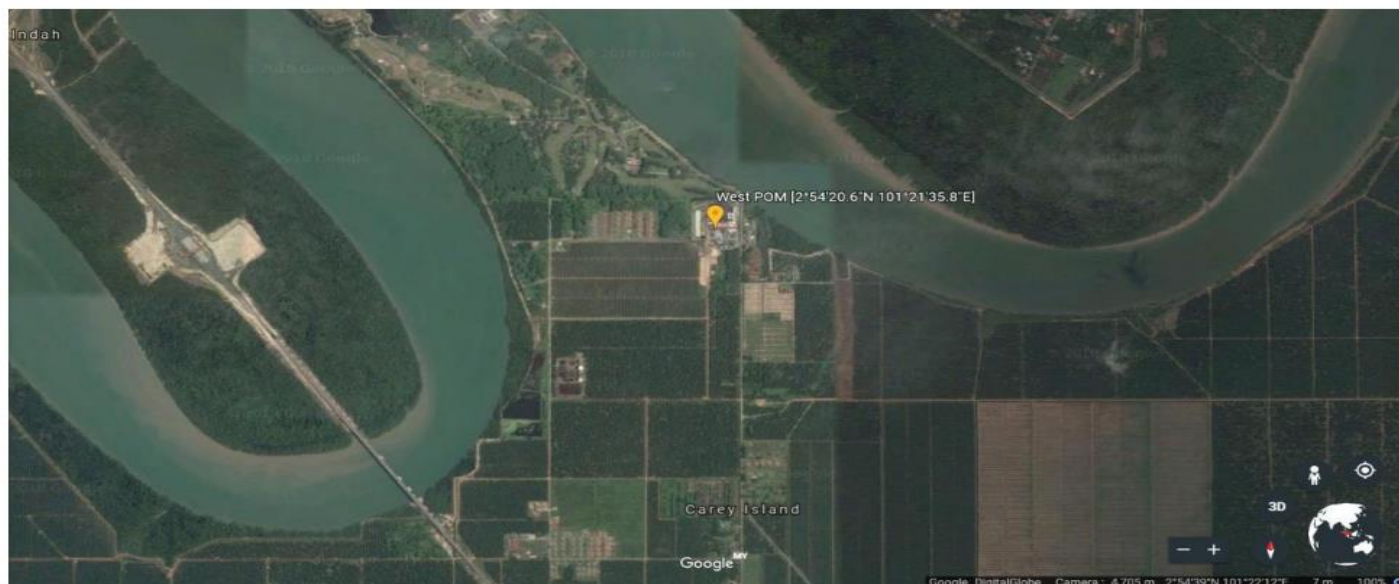
Emissions	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

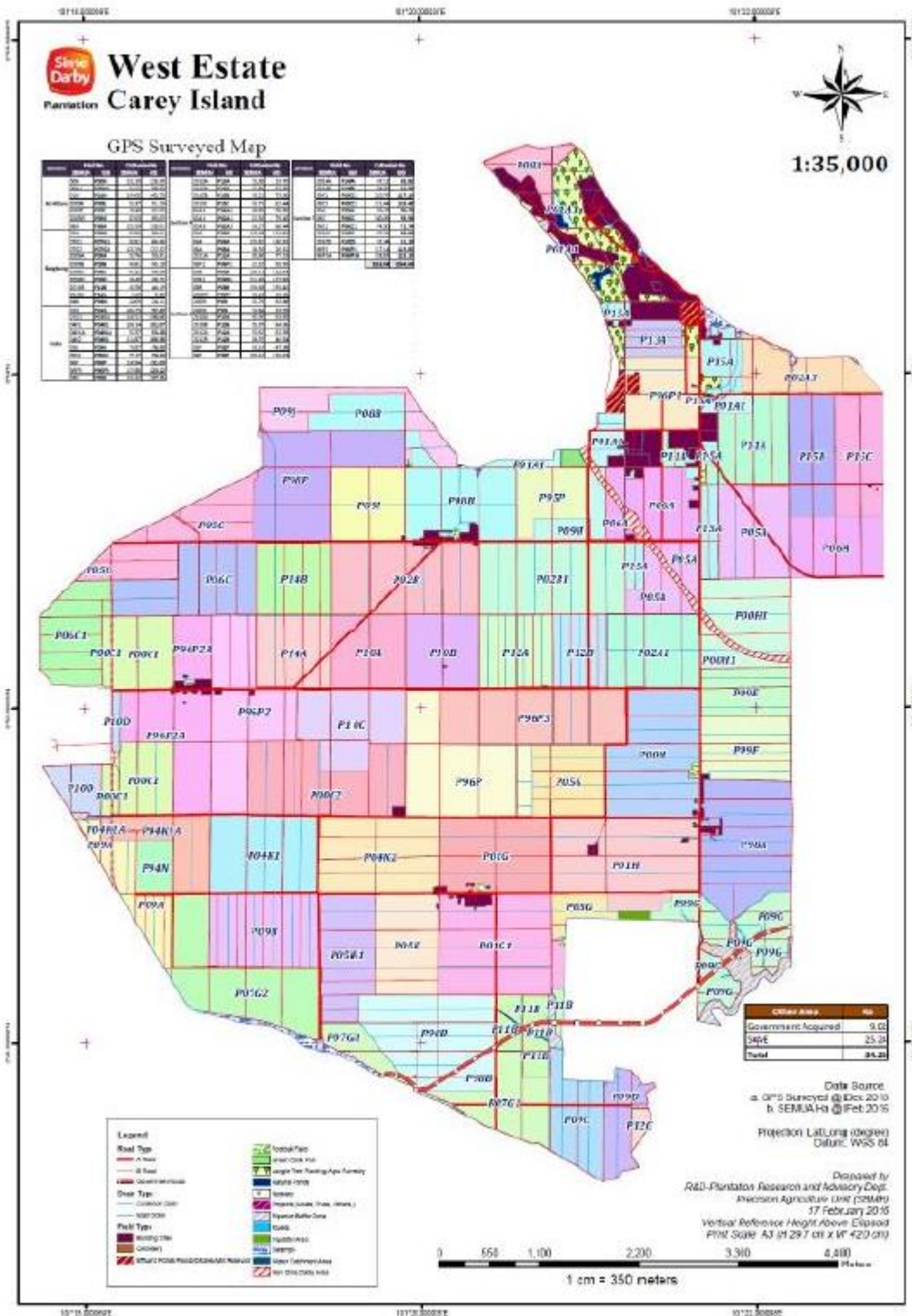
<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

<b>POME Diverted to Anaerobic Digestion:</b>	
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
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