



SIRIM QAS INTERNATIONAL SDN. BHD.
Building 4, SIRIM Complex, No. 1, Persiaran Dato' Menteri,
Section 2, 40700 Shah Alam, Selangor, Malaysia.

File Ref.: ES10171011

RSPO PUBLIC SUMMARY REPORT

CLIENT : SIME DARBY PLANTATION BERHAD – SOU 6 TENNAMARAM

PARENT COMPANY : SIME DARBY PLANTATION BERHAD

RSPO MEMBERSHIP NO.: 1-0008-04-000-00

LOCATION OF THE CERTIFICATION UNIT (MILL AND THE SUPPLY BASE):
(In the case of multisite certification, list additional sites in attachments)

| Certification Unit | Mill and Supply Base | GPS Location | | Location |
|---------------------|----------------------|----------------|------------------|------------------------------|
| | | Latitude | Longitude | |
| SOU 6 Tennamaram | Tennamaram POM | 3°23' 44.30" N | 101°25' 03.41" E | 45600 Bestari Jaya, Selangor |
| | Tennamaram Estate | 3°24' 11.35" N | 101°23' 59.24" E | 45600 Bestari Jaya, Selangor |
| | Sungai Buloh Estate | 3°18' 32.27" N | 101°19' 07.23" E | 45700 Bukit Rotan, Selangor |
| | Bukit Talang Estate | 3°24' 09.15" N | 101°18' 35.72" E | 45000 Kuala Selangor |

MAP : See Attachment 1

AUDIT DATE : 12 – 16 November 2018

DURATION : 20 auditor days

TYPE OF AUDIT : ☒ Annual Surveillance Audit No.3 ☐ Recertification Audit

STANDARD : RSPO PRINCIPLE & CRITERIA MYNI 2014, AND RSPO SUPPLY CHAIN CERTIFICATION STANDARD 2014

SCOPE OF CERTIFICATION: Production of Sustainable Crude Palm Oil and Palm Kernel Using the Identity Preserved Supply Chain Model

VALIDITY OF RSPO CERTIFICATE : 03 March 2016 - 02 March 2021

The following attachments form part of this report:

Non-conformity Report(s) ☐

List of additional site(s) ☐

Report by Audit Team Leader

Name : Mohd Zulfakar Kamaruzaman

Signature :

Date : 22/02/2019

Acknowledgement by Client's Representative

Name : *Sime Darby Plantation Berhad*
Sungai Buloh Estate

Signature :

Date : **NOOR ARIZAN BIN AHMAD**
Senior Manager

26.02.2019

SUMMARY OF AUDITS

| Stage 2 audit / Recertification audit | | | | |
|--|---|----------------------------|-----------------------|--------------------------|
| On-site audit date : | 11 – 15/01/2016 | | No. of auditor days : | 15 |
| Audit team : | Ruzita Abd Gani, Mohd Razman Salim & Selvasingam T. Kandiah | | | |
| No. of major NCR : | 1 | Indicator: 2.1.1 | | Closing date : 11/3/2016 |
| No. of minor NCR : | 2 | Indicator : 4.1.2 & 6.10.4 | | |
| Indicate the stakeholders interviewed during the on-site audit : | Employees | | Settlers | Villagers |
| | / | | | / |
| | Contract workers | | NGOs | Govt. agency |
| | / | | | / |
| | Indigenous people | | Contractor | Others (Please specify) |
| | NA | | / | |
| Supply base sampled : | Sungai Buloh Estate and Bukit Talang Estate | | | |

| Annual Surveillance Audit 1 | | | | |
|---|--|---|----------------------------|-------------------------|
| On-site audit date : | 20-23/12/16 | | No. of auditor days : | 14 |
| Audit team : | Hazani Othman, Mohd. Zulfakar Kamaruzaman, Rozaimee Ab. Rahman, Selvasingam T. Kandiah | | | |
| No. of major NCR : | 4 | Indicator : 4.4.2, 4.6.11, 4.7.3, 6.9.1 | | Closing date : 6/2/2017 |
| No. of minor NCR : | 3 | Indicator : 2.2.2, 4.1.2, 4.7.5 | | |
| Indicate by ticking the stakeholders interviewed during the on-site audit : | Employees | | Settlers | Villagers |
| | √ | | NA | √ |
| | Contract workers | | NGOs | Govt. agency |
| | | | | |
| | Indigenous people | | Contractor | Others (Please specify) |
| | NA | | Union, Headmaster | - |
| Supply base sampled : | Tennamaram (+ Elmina) Estate, Sungai Buloh Estate | | | |
| Changes since the last audit : | Elmina Estate has been amalgamated into Tennamaram Estate as one of the division known as the Elmina Division. | | | |
| Report approved by : | Aminah Ang | | Approval date : 17/05/2017 | |

| Annual Surveillance Audit 2 | | | | |
|---|---|--|----------------------------|-------------------------------|
| On-site audit date : | 4-8 December 2017 | | No. of auditor days : | 18 |
| Audit team : | Mohd Zulfakar Kamaruzaman (LA), Rozaimee Ab Rahman, Selvasingam T. Kandiah, Amir Bahari | | | |
| No. of major NCR : | 6 | Indicator: 2.1.1, 4.1.1, 4.5.4, 4.7.2, 5.3.2 & D4.1 (Supply Chain) | | Closing date : 8/2/2018 |
| No. of minor NCR : | 1 | Indicator: 4.1.2 | | |
| Indicate by ticking the stakeholders interviewed during the on-site audit : | Employees | | Settlers | Villagers / Local communities |
| | √ | | | √ |
| | Contract workers | | NGOs | Govt. agency |
| | | | | Independent growers |
| | Indigenous people | | Contractor | Others (Please specify) |
| | NA | | √ | |
| Supply base sampled : | Tennamaram Estate and Bukit Talang Estate | | | |
| Changes since the last audit : | No Changes | | | |
| Report approved by : | Radziah Binti Mohd Daud | | Approval date : 19/03/2018 | |

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| Annual Surveillance Audit 3 | | | | |
|---|---|---|--|---------------------|
| On-site audit date : | 12 – 16 November 2018 | No. of auditor days : | 20.0 auditor day | |
| Audit team : | Mohd Zulfakar Kamaruzaman (LA), Rozaimée Ab Rahman, Selvasingam T. Kandiah and Rahayu Zulkifli | | | |
| No. of major NCR : | 2 | Indicator : 2.1.1, D 4.2 (Supply Chain) | Closing date : 2.1.1 on 28/11/18 D 4.2 on 11/02/19 | |
| No. of minor NCR : | 5 | Indicator : 2.1.3, 4.1.2, 4.1.3, 6.1.4, 6.8.3 | | |
| Indicate by ticking the stakeholders interviewed during the on-site audit | Employees | Settlers | Villagers / Local communities | Suppliers |
| | √ | | √ | √ |
| | Contract workers | NGOs | Govt. agency | Independent growers |
| | √ | | √ | |
| | Indigenous people | Contractor | Others (Please specify) | |
| | NA | √ | | |
| Supply base sampled : | Tennamaram Estate, Sungei Buloh Estate and Bukit Talang Estate | | | |
| Changes since the last audit : | No changes | | | |
| Justification of audit planning : | <p>The total allocation of auditor days for SOU Tennamaram were: 20.0 auditor days Mill = 6 days (5 day for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) There was Three (3) estates audited namely Tennamaram Estate, Sungei Buloh Estate, Bukit Talang Estate. A 6 man-day was allocated only for Tennamaram Estate for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title. A four (4) man-day for each balance two Estates (Bukit Talang and Sungei Buloh) was allocated for verification of safety and health, environment, good agriculture best practices, Social, HCV and the verification of Land History and Land Title. The total for the entire CU is therefore 20 man-day which justified the no of auditors and their respective days for this audit.</p> | | | |
| Report approved by : | Radziah Mohd. Daud | | Approval date : 22/02/2019 | |

| Annual Surveillance Audit 4 | | | | |
|---|-------------------|-----------------------|-------------------------------|---------------------|
| On-site audit date : | | No. of auditor days : | | |
| Audit team : | | | | |
| No. of major NCR : | | Indicator : | Closing date : | |
| No. of minor NCR : | | Indicator : | | |
| Indicate by ticking the stakeholders interviewed during the on-site audit | Employees | Settlers | Villagers / Local communities | Suppliers |
| | | | | |
| | Contract workers | NGOs | Govt. agency | Independent growers |
| | | | | |
| | Indigenous people | Contractor | Others (Please specify) | |
| | | | | |
| Supply base sampled : | | | | |
| Changes since the last audit : | | | | |
| Justification of audit planning : | | | | |
| Report approved by : | | | Approval date : | |

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SUMMARY OF INFORMATION

TABLE 1

| | STAGE 2 / RA | ASA 1 | ASA 2 | ASA 3 | ASA 4 |
|----------------------------------|--|---------------------|---------------------|---------------------|-------|
| Projection Period | | Dec 2016 – Nov 2017 | Dec 2017 – Nov 2018 | Dec 2018 – Nov 2019 | |
| Certified FFB Processed (MT) | | 234,649.32 | 229,730.85 | 242,618.49 | |
| Production of Certified CPO (MT) | | 45,417.42 | 48,243.48 | 50,317.65 | |
| Production of Certified PK (MT) | | 11,486.44 | 12,635.20 | 13,382.76 | |
| Certified Areas (Ha) | | 12,002.52 | 12,002.52 | 12,002.52 | |
| Planted Areas (Ha) | | 11,282.65 | *11,274.85 | *11,274.85 | |
| Production Areas (Ha) | | 9,594.84 | 9,545.44 | 9,544.95 | |
| HCV Areas | - | 3.26 | 3.26 | 3.26 | |
| REMARKS | <p style="text-align: center;">-</p> <p>*Changes at planted area due to convert to road/drain.</p> <p style="text-align: right;">-</p> | | | | |

TABLE 2

| | PO | PK |
|---|-----------|-------------|
| Last years certified volume (MT) | 48,243.48 | **13,835.20 |
| Last years actual certified sold (MT) | 42,017.46 | 11,014.92 |
| Last years actual sold under other schemes (MT) | 0 | 0 |
| Last years sold conventional (MT) | 4,742.67 | 1,757.14 |
| New year certified volume (MT) | 50,317.65 | 13,382.76 |

**An extension of additional volume for 1,200MT PK has been made and approved by RSPO EB on 29/11/2018.

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1.0 AUDIT PROCESS

1.1 Certification Body

SIRIM QAS International Sdn. Bhd. is the leading certification, inspection and testing body in Malaysia. SIRIM QAS International provides a comprehensive range of certification, inspection and testing services which are carried out in accordance with internationally and nationally recognised standards. Attestation of this fact is the accreditation of the various certification and testing services by leading national and international accreditation and recognition bodies such as the Department of Standards Malaysia (STANDARDS MALAYSIA), the United Kingdom Accreditation Services (UKAS) and the International Automotive Task Force (IATF). SIRIM QAS International is a partner of IQNet, a network currently comprising of leading certification bodies in Europe, North and South America, East Asia and Australia.

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and accredited by ASI on 27 September 2014.

1.2 Qualification of audit team

| Member of the Audit Team | Role/area of RSPO requirements | Qualifications |
|---------------------------|---|---|
| Mohd Zulfakar Kamaruzaman | Lead Auditor Land Title, HCV and SC | Holds a B.Sc. Forestry. He had 5 years of working experience in the oil palm operation. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor. |
| Selvasingam T Kandiah | Auditor GAP, Health & Safety related to plantation | Holds a B.Sc. (Hons) in Agriculture, he had work as a planter with Kumpulan Guthrie Berhad for more than 10 years including one year in Liberia and 2 years in Estate Department in Guthrie Headquarters. |
| Rozaimie Ab. Rahman | Auditor Health & Safety, Environment and Time Bound Plan | Holds a B. Sc. of Agriculture. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO. |
| Rahayu Zulkifli | Auditor, Social | Holds a Degree in LLB (Hon), she was a practicing lawyer before joining WWF-Malaysia and RSPO as a Dispute Settlement Facility Manager. She is now working as a freelance RSPO auditor. |

1.3 Audit methodology

The audit covered the Tennamaram palm oil mill and all 3 of its supply base. The audit included an on-site audit to the estates, mill and settlers' houses (can be expanded) to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

Stakeholder consultation was carried out during the on-site audit. In general, there was no negative comments made against this Certification Unit.

1.5 Audit plan: Refer to Attachment 2.

1.6 Date of next audit : The next surveillance audit will be conducted within 12 months but not sooner than 8 months from this audit.

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Tennamaram certification unit (CU) is one of the Sime Darby Plantation Sdn Bhd's (SDPSB's) Strategic Operating Unit (SOU). The CU is also known as SOU 6 and was certified to the RSPO P&C by SIRIM QAS International Sdn Bhd in 2015. In 2016, the CU was certified with one mill and 4 estates. For 2017, the number of unit of supply base of SOU 6 had been reduced to 3, i.e. Tennamaram Estate, Bukit Talang Estate and Sungai Buloh Estate. Previously Elmina Estate had been amalgamated into Tennamaram Estate, which now known as Elmina Division (i.e. as a new sub-unit of Tennamaram Estate).

The palm oil mill maintained its capacity of 60 mt FFB / hour. All the estates within the CU have been fully developed before the year of 2005. Hence, Principle 7 of the RSPO P&C is therefore not applicable

2.2 Description of the Supply Base (including the planting profile)

The FFB sourced from company owned estates that are certified. Details of the FFB contribution from each source to the Tennamaram Palm Oil Mill are shown in the following tables:

**Table 1: Actual FFB production by the supply base for the last reporting period
(Dec 2017- Nov 2018)**

| Estates | FFB Production (MT) | Percentage (%) | Certifying CB |
|---|---------------------|----------------|---------------|
| Tennamaram (<i>inclusive of Elmina</i>) | 56,620.24 | 24.65 | SIRIM |
| Bukit Talang | 61,977.31 | 26.98 | SIRIM |
| Sungai Buloh | 101,131.37 | 44.02 | SIRIM |
| Bukit. Kerayong | 2,439.85 | 1.06 | BSI |
| Bukit Cherakah | 3,074.62 | 1.34 | BSI |
| Dusun Durian | 1,260.19 | 0.55 | BSI |
| Bradwall | 632.85 | 0.28 | BSI |
| Sepang | 2,594.42 | 1.13 | BSI |
| Total | 229,730.85 | 100.00 | |

**Table 2: Projected FFB production by supply base for the next reporting period
(Dec 2018- Nov 2019)**

| Estates | FFB Production (MT) | Percentage (%) | Certifying CB |
|---|---------------------|----------------|---------------|
| Tennamaram (<i>inclusive of Elmina</i>) | 45,500.00 | 18.75 | SIRIM |
| Bukit Talang | 65,000.00 | 26.79 | SIRIM |
| Sungai Buloh | 132,118.49 | 54.46 | SIRIM |
| Total | 242,618.49 | 100.00 | |

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Table 3: Actual FFB received and CPO & PK dispatch by Tennamaram Mill for the last reporting period (Dec 2017- Nov 2018)

| RSPO Supply Chain Model : Identity Preserved | Total (MT) |
|--|------------|
| FFB Received | 229,730.85 |
| FFB Processed | 229,730.85 |
| CPO Production | 46,760.13 |
| PK Production | 12,772.06 |
| CPO delivered as RSPO certified | 42,017.46 |
| CPO delivered under other schemes (MT) | 0.00 |
| CPO delivered as non-RSPO certified | 4,742.67 |
| PK delivered as RSPO certified | 11,014.92 |
| PK delivered under other schemes (MT) | 0.00 |
| PK delivered as non-RSPO certified | 1,757.14 |

Table 4: Projected FFB received and CPO & PK dispatch by the Tennamaram Mill of the next reporting period (Dec 2018- Nov 2019)

| RSPO Supply Chain Model : Identity Preserved | Total (MT) |
|--|------------|
| FFB Received | 242,618.49 |
| FFB Processed | 242,618.49 |
| CPO Production | 50,317.65 |
| PK Production | 13,382.76 |
| CPO delivered as RSPO certified | 50,317.65 |
| CPO delivered as non-RSPO certified | 0.00 |
| PK delivered as RSPO certified | 13,382.76 |
| PK delivered as non-RSPO certified | 0.00 |

Table 5 Planted and certified area of SOU Tennamaram

| Estate | Planted (ha) | Certified (ha) |
|---|------------------|------------------|
| Tennamaram (<i>inclusive of Elmina</i>) | 2,917.66 | 3,213.33 |
| Sungei Buloh | 4,823.22 | 5,154.08 |
| Bukit Talang | 3,533.97 | 3,635.11 |
| Total | 11,274.85 | 12,002.52 |

Table 6: Planting profile for Tennamaram Estate

| <u>Year of planting</u> | <u>Planting Cycle (1st, 2nd, 3rd etc Generation)</u> | <u>Mature/Immature (Ha)</u> | <u>Planted area (ha)</u> | <u>Percentage of planted area</u> |
|-------------------------|--|-----------------------------|--------------------------|-----------------------------------|
| 2002 | 1st | Mature | 22.88 | 0.78 |
| 2002 | 2nd | Mature | 35.91 | 1.23 |
| 2003 | 2nd | Mature | 71.09 | 2.44 |
| 2004 | 2nd | Mature | 53.58 | 1.84 |
| 2006 | 2nd | Mature | 180.97 | 6.20 |
| 2007 | 2nd | Mature | 67.34 | 2.31 |

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| | | | | |
|--------------|-----|----------|-----------------|---------------|
| 2008 | 1st | Mature | 118.41 | 4.06 |
| 2008 | 2nd | Mature | 88.37 | 3.03 |
| 2009 | 1st | Mature | 119.52 | 4.10 |
| 2009 | 2nd | Mature | 54.22 | 1.86 |
| 2010 | 1st | Mature | 99.00 | 3.39 |
| 2010 | 2nd | Mature | 220.8 | 7.57 |
| 2011 | 2nd | Mature | 104.27 | 3.57 |
| 1986 | 1st | Mature | 49.1 | 1.68 |
| 1987 | 1st | Mature | 70.85 | 2.43 |
| 1988 | 1st | Mature | 85.14 | 2.92 |
| 1989 | 1st | Mature | 78.29 | 2.68 |
| 1990 | 1st | Mature | 65.57 | 2.25 |
| 1990 | 3rd | Mature | 67.11 | 2.30 |
| 1991 | 3rd | Mature | 119.72 | 4.10 |
| 1992 | 3rd | Mature | 113.66 | 3.89 |
| 1993 | 3rd | Mature | 10.24 | 0.35 |
| 1994 | 1st | Mature | 80.25 | 2.75 |
| 1995 | 1st | Mature | 73.39 | 2.51 |
| 1996 | 3rd | Mature | 87.24 | 2.99 |
| 1997 | 3rd | Mature | 83.96 | 2.88 |
| 1999 | 3rd | Mature | 107.41 | 3.68 |
| 2012 | 1st | Mature | 112.6 | 3.86 |
| 2013 | 4th | Mature | 36.47 | 1.25 |
| 2013 | 4th | Immature | 63.58 | 2.18 |
| 2014 | 4th | Immature | 119.12 | 4.08 |
| 2017 | 4th | Immature | 94.97 | 3.25 |
| 2018 | 4th | Immature | 162.63 | 5.57 |
| TOTAL | | | 2,917.66 | 100.00 |

Table 7: Planting profile for Sungei Buloh Estate

| Year of Planting | Planting Cycle | Maturity status | Planted Area (Ha) | % |
|------------------|--------------------|-----------------|-------------------|-------|
| 1992 | 2nd | Mature | 224.70 | 4.67 |
| 1993 | 2nd | Mature | 525.51 | 10.88 |
| 1994 | Rubber to Oil Palm | Mature | 67.50 | 1.40 |
| 1995 | 2nd | Mature | 207.80 | 4.31 |
| 1996 | 2nd | Mature | 196.50 | 4.07 |
| 1997 | 2nd | Mature | 294.00 | 6.1 |
| 1998 | 2nd | Mature | 329.00 | 6.82 |
| 2000 | 2nd | Mature | 68.50 | 1.42 |
| 2001 | 2nd | Mature | 129.10 | 2.68 |
| 2002 | 2nd | Mature | 254.40 | 5.27 |
| 2003 | 2nd | Mature | 84.70 | 1.76 |
| 2004 | 2nd | Mature | 74.90 | 1.55 |
| 2006 | 2nd | Mature | 127.90 | 2.65 |
| 2007 | 3rd | Mature | 173.30 | 3.59 |
| 2008 | 3rd | Mature | 200.50 | 4.15 |

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| | | | | |
|--------------|-----|----------|-----------------|---------------|
| 2009 | 3rd | Mature | 154.00 | 3.2 |
| 2010 | 3rd | Mature | 330.40 | 6.85 |
| 2011 | 3rd | Mature | 77.50 | 1.61 |
| 2013 | 3rd | Mature | 401.00 | 8.31 |
| 2014 | 3rd | Mature | 217.90 | 4.52 |
| 2015 | 3rd | Immature | 296.27 | 6.15 |
| 2016 | 3rd | Immature | 182.01 | 3.78 |
| 2017 | 3rd | Immature | 205.83 | 4.27 |
| Total | | | 4,823.22 | 100.00 |

Table 8: Planting profile for Bukit Talang Estate

| Year of Planting | Planting cycle (1st, 2nd, 3rd, etc. Generation) | Mature/Immature | Planted Area (Ha) | Percentage of Planted (Ha) |
|------------------|---|-----------------|----------------------|-------------------------------|
| 1991 | 3rd | Mature | 14.61 | 0.41 |
| 1992 | 3rd | Mature | 36.93 | 1.05 |
| 1993 | 3rd | Mature | 156.83 | 4.44 |
| 1994 | 3rd | Mature | 65.99 | 1.87 |
| 1995 | 3rd | Mature | 100.36 | 2.84 |
| 1996 | 3rd | Mature | 150.08 | 4.25 |
| 1997 | 3rd | Mature | 210.93 | 5.97 |
| 1998 | 3rd | Mature | 260.58 | 7.37 |
| 1999 | 3rd | Mature | 182.67 | 5.17 |
| 2000 | 3rd | Mature | 221.96 | 6.28 |
| 2001 | 3rd | Mature | 400.56 | 11.33 |
| 2002 | 3rd | Mature | 201.94 | 5.71 |
| 2003 | 3rd | Mature | 283.39 | 8.02 |
| 2004 | 3rd | Mature | 47.74 | 1.35 |
| 2007 | 3rd | Mature | 93.29 | 2.64 |
| 2008 | 3rd | Mature | 49.26 | 1.39 |
| 2009 | 3rd | Mature | 42.68 | 1.21 |
| 2011 | 3rd | Mature | 47.38 | 1.34 |
| 2012 | 3rd | Mature | 309.19 | 8.75 |
| 2013 | 3rd | Mature | 52.11 | 1.47 |
| 2014 | 3 rd | Immature | 46.63 | 1.32 |
| 2016 | 3 rd | Immature | 347.02 | 9.82 |
| 2017 | 3 rd | Immature | 211.84 | 5.99 |
| Total | | | 3533.97 | 100.00 |

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2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

| | | |
|-----------|---|--|
| Name | : | Mr. Zalizan Mohd Tahir |
| Position | : | Mill Manager |
| Address | : | 45600 Bestari Jaya Selangor Darul Ehsan |
| Phone no. | : | +603-32719701 |
| Fax no. | : | +603-2719062 |
| Email | : | kks.tennamaram@simedarby.com |

3.0 AUDIT FINDINGS

3.1 Changes to certified products in accordance to the production of the previous year

There was no change to the certified products since last assessment.

3.2 Progress and changes in time bound plan (Refer to Attachment 7 for the time bound plan)

- i. Have all the estates under the parent company been certified? ☐ Yes ☒ No

If no, comments on the organization's compliance with the RSPO partial certification rules :

Sime Darby Plantation – Indonesian Operations is in progress to certify all 8 new SOUs from 2017 to 2020 as verified through the Time Bound Plan (updated in December 2017). The SOUs are PT Sime Indo Agro, PT Ladangrumpun Suburabadi, PT Bersama Sejahtera Sakti, PT Bahari Gembira Ria, PT Guthrie Pecconina Indonesia, PT Mitra Austral Sejahtera (MAS), PT Sandika Nata Palma & PT Budidaya Agro Lestari.

- ii. Are there any changes to the organization's time bound plan? ☒ Yes ☐ No

If yes, comment in terms of acceptance or non acceptance on the changes in the time-bound plan?

The time bound plan for Sime Darby Plantation Sdn Bhd, updated as at December 2017 is provided in Attachment 7 of this report.

- iii. Are there associated smallholders (including scheme smallholders) in the CU ☐ Yes ☒ No

If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification? ☐ Yes ☐ No

If no, please state reasons Not applicable.

There is no associated smallholders supplying FFB to the CU.

- iv. Any new acquisition which has replaced primary forests or HCV areas ☐ Yes ☒ No

3.3 Other changes (e.g. organizational structure, new contact person, addresses, etc.)

Sime Darby Plantation Sdn Bhd has been changed to Sime Darby Plantation Berhad.

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3.4 Status of previous non-conformities *

☐

Closed

☒

Not closed*

* If not closed, minor non-conformity will be upgraded to major non conformity

One Major non-conformity from last year audit findings under Indicator 2.1.1 were found to be recurring in this audit, hence suspension of this CU has been recommended by the Lead Auditor during the closing meeting. Noted that the CU has managed to take appropriate action in addressing the finding, and the NCR has been closed on 29 Nov 2018. The lifting of suspension has been processed and submitted to RSPO EB on the same day.

3.5 Complaint received from stakeholder (if any)

No complaints from stakeholders were observed.

4.0 DETAILS OF NON-CONFORMITY REPORT

4.1 For P&C (Details checklist refer to Attachment 3) :

Total no. of minor NCR(s)
(details refer to Attachment 4) List : 5 2.1.3, 4.1.2, 4.1.3, 6.1.4, 6.8.3

Total no. of major NCR(s)
(details refer to Attachment 4) List : 2 2.1.1 (Recurrence Major), D 4.2 (Supply Chain)

4.2 For SC (Details checklist refer to Attachment 5) :

Total no. of minor NCR(s) (details
refer to Attachment 5) List : -

Total no. of major NCR(s)
(details refer to Attachment 5) List :

5.0 AUDIT CONCLUSION

The audit team concludes that the organization has established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.

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6.0 RECOMMENDATION



No NCR recorded. Recommended to continue certification.



Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.

Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs.



Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.



Recommended to continue certification.



Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.

Note: Major NCRs which are not addressed within a further 60 days shall result in the certificate being withdrawn.

7.0 IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED. RECOMMENDED FOR CONTINUATION OF RSPO P & C CERTIFICATION.

Audit Team Leader :

MOHD ZULFAKAR
KAMARUZAMAN



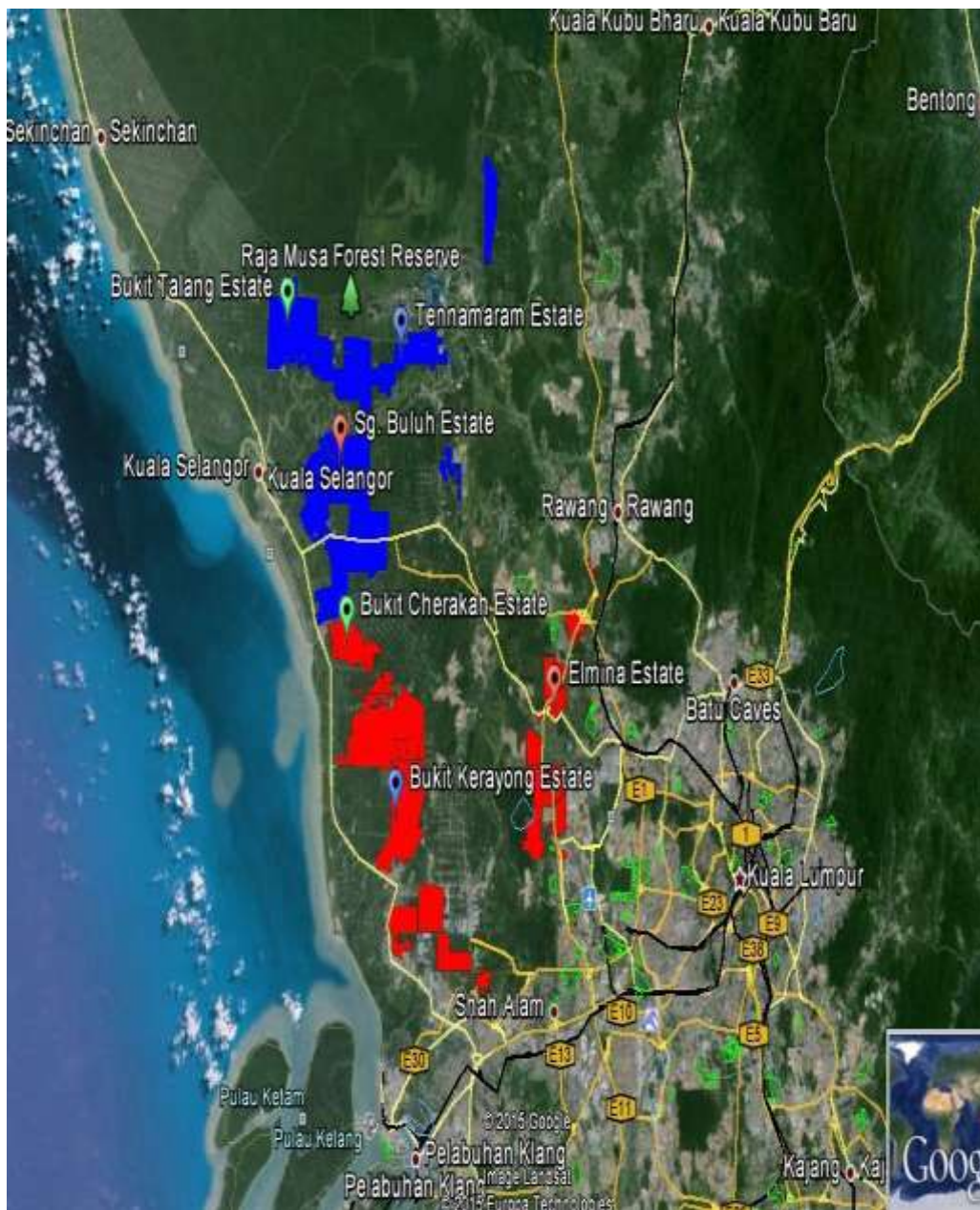
11/2/2019

(Name)

(Signature)

(Date)

Map of SOU Tennamaram



RSPO Surveillance Audit Plan

1. Objectives

The objectives of the audit are as follows:

- (i) To evaluate the Certification Unit conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI) and RSPO Supply Chain requirements.
- (ii) To verify the effective implementation of corrective actions arising from the findings of last assessment.
- (iii) To make appropriate recommendations based on the assessment findings.

2. Date of assessment : 12 to 16 November 2018

3. Site of assessment : SOU Tennamaram

- Tennamaram Palm Oil Mill
- Tennamaram Estate
- Sungei Buloh Estate
- Bukit Talang Estate

4. Reference Standard:

- a. RSPO P&C MYNI:2014
- b. RSPO Certifications Systems for P&C, June 2017
- c. RSPO Supply Chain Standard, 2017
- d. Company's audit criteria including Company's Manual / Procedures

5. Assessment Team

- a) Lead Auditor : MOHD ZULFAKAR KAMARUZAMAN (HCV, SC)
- b) Auditors : ROZAIMEE AB RAHMAN (Environmental, Safety, Health, GHG)
- : RAHAYU ZULKIFLI (Social)
- : SELVASINGAM T KANDIAH (GAP, Safety)

If there is any objection to the proposed audit team, the organization is required to inform the Lead Auditor/RSPO Section Manager.

7. Audit Method

Site audits including observation of practices, interviews with interested parties (all categories of contractors, employees, nearby population, etc.), documentation evaluation and evaluation of records.

8. Audit Findings

Audit findings shall be classified as major and/or minor. Major non conformities shall be addressed within 90 days or else the certificate shall be suspended. If the major non conformities are still not addressed within another 90 days, the certificate shall be terminated.

If there are five or more major non-compliances within one Principle found during the audit, immediate suspension of RSPO certification shall be recommended.

For minor non conformities raised in the surveillance audit, corrective action shall be verified in the next audit. These shall be upgraded to major non-conformities if the corrective actions are not satisfactory implemented in the next audit.

9. Confidentiality Requirements

SIRIM QAS International shall not disclose any information concerning the company regarding all matters arising or coming to its attention with the conduct of the programme, which is of confidential in nature other than information, which is in the public domain.

In the event that there be any legal requirements for disclosing any information concerning the organization, SIRIM QAS International shall inform the organization of the information to be disclosed.

10. Working Language : English and Bahasa Malaysia

11. Reporting

- | | | | |
|----|------------------------|---|---|
| a) | Language | : | English |
| b) | Format | : | Verbal and written |
| c) | Expected date of issue | : | 2 weeks after the closure of the Major NC / or if only minor NC, 30 days from the last day of this audit. |

12. Facilities Required

- a. Room for discussion
- b. Relevant document and record
- c. Personnel protective equipment if required
- d. Photocopy facilities
- e. A guide for each group

13. Assessment Programme Details : As below

| Date / Time | Coverage of assessment / Activity / Site | MZK | RZ | RAR | STK |
|-------------------------------------|--|-----|----|-----|-----|
| Day 1-12/11/18 9.00am – 9.30am | Opening Meeting – Venue: Tennamaram POM <ul style="list-style-type: none"> Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases , Time bound plan, actions taken to address previous audit findings. | / | / | / | / |
| 9.15am – 12.30pm | Site observation to Tennamaram POM P1, P2, P3, P4, P5, P6, P7, P8, Supply Chain <ul style="list-style-type: none"> Environment, Occupational safety & health aspects, chemical management Laws and regulations Interview with workers, contractors etc. Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the mill Interview with gender committee, safety committee, worker representative, contractors, supplier, etc Site visit and assessment on Supply Chain Implementation including the Model used : General Chain of Custody System Requirements for the supply chain <ul style="list-style-type: none"> Documented procedures, Purchasing and goods in, Outsourcing activity, Sales and goods out, Processing, Records keeping, Registration, Training, Claims, Internal Audit, Management Review. | / | | / | |
| 9.15am – 12.30pm | Site observation to Tennamaram Estate P1, P2, P3, P4, P5, P6, P7, P8 <ul style="list-style-type: none"> Environment, Occupational safety & health aspects, chemical management Laws and regulations Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, IPM New planting Interview with workers, contractors etc. Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the mill Interview with gender committee, safety committee, worker representative, contractors, supplier, etc | | / | | / |
| 12.30pm – 1.30pm | Lunch Break | | | | |
| 1.30pm – 5.00pm | Continue assessment at respective sites | / | / | / | / |
| Date / Time | Coverage of assessment / Activity / Site | MZK | RZ | RAR | STK |
| Day 2 – 13/11/18 8.30am – 1.00pm | Site observation to Tennamaram Estate P1, P2, P4,P5, P7,P8 <ul style="list-style-type: none"> HCV Assessment, HCV Management Biodiversity Monitoring/HCV Monitoring, HCV Planning Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Occupational safety & health aspects , chemical management Environmental management, waste & chemical management | / | | / | |
| | Site observation to Sungei Buloh Estate P1, P2, P3, P4, P5, P6, P7, P8 <ul style="list-style-type: none"> Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the Estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Occupational safety & health aspects , chemical management Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, | | / | | / |

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| | <ul style="list-style-type: none"> IPM New planting | | | | |
|-------------------------------------|--|-----|----|-----|-----|
| 1.00pm – 2.00pm | Lunch Break | | | | |
| 2.00pm – 5.00pm | Continue assessment at respective site | / | / | / | / |
| | | | | | |
| Date / Time | Coverage of assessment / Activity / Site | MZK | RZ | RAR | STK |
| Day 3 – 14/11/18 8.30am – 1.00pm | Site observation to Sungei Buloh Estate P1, P2, P4,P5, P7,P8 <ul style="list-style-type: none"> HCV Assessment, HCV Management Biodiversity Monitoring/HCV Monitoring, HCV Planning Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Occupational safety & health aspects , chemical management Environmental management, waste & chemical management | / | | / | |
| | Site observation to Bukit Talang Estate P1, P2, P3, P4, P5, P6, P7, P8 <ul style="list-style-type: none"> Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the Estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Occupational safety & health aspects , chemical management Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, IPM New planting | | / | | / |
| 1.00pm – 2.00pm | Lunch Break | | | | |
| 2.00pm – 5.00pm | Continue assessment at respective site | / | / | / | / |
| Date / Time | Coverage of assessment / Activity / Site | MZK | RZ | RAR | STK |
| Day 4 – 15/11/18 8.30am – 1.00pm | Site observation to Bukit Talang Estate P1, P2, P4,P5, P7,P8 <ul style="list-style-type: none"> HCV Assessment, HCV Management Biodiversity Monitoring/HCV Monitoring, HCV Planning Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Occupational safety & health aspects , chemical management Environmental management, waste & chemical management | / | | / | |
| | Site observation to Tennamaram POM P1, P2, P3, P4, P5, P6, P7, P8 <ul style="list-style-type: none"> Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the Mill Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Occupational safety & health aspects , chemical management Good Agricultural Practice such as Management Plan, IPM New planting | | / | | / |
| 1.00pm – 2.00pm | Lunch Break | | | | |
| 2.00pm – 5.00pm | Continue assessment at respective site | / | / | / | / |

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| Date / Time | Coverage of assessment / Activity / Site | MZK | RZ | RAR | STK |
|-------------------------------------|---|-----|----|-----|-----|
| Day 5 – 16/11/18 8.30am – 1.00pm | Site observation to Tennamaram POM P1, P2, P3, P4, P5, P6, P7, P8, Supply Chain <ul style="list-style-type: none"> • Environment, Occupational safety & health aspects, chemical management • Laws and regulations • Interview with workers, contractors etc. • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the mill • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc | / | | / | |
| | Site observation to Tennamaram Estate P1, P2, P3, P4, P5, P6, P7, P8 <ul style="list-style-type: none"> • Environment, Occupational safety & health aspects, chemical management • Laws and regulations • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, • IPM New planting • Interview with workers, contractors etc. • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the mill • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc | | / | | / |
| 1.00pm – 2.30 pm | Lunch Break/Friday prayer | | | | |
| 2.30pm –3.00pm | Continue assessment at respective site | / | / | / | / |
| 3.00 pm – 4.00 pm | Audit Team Discussion | / | / | / | / |
| 4.00pm – 5.00pm | Closing meeting | / | / | / | / |

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Attachment 3

RSPO P&C Audit Checklist and Findings

Principle 1: COMMITMENT TO TRANSPARENCY

| Clause | Indicators | | Comply Yes/No | Findings |
|---|------------|--|---------------|---|
| C 1.1 Growers and millers provide adequate info to relevant stakeholders on env, social and legal issues relevant to RSPO Criteria, in appropriate languages & forms to allow for effective participation in decision making. | 1.1.1 | There shall be evidence that growers and millers provide adequate information upon request for information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. | YES | SOU Tennamaram continued to implement the communication procedure and maintain records on requests for information. The procedure for responding to any communication is as outlined in sub-section 5.5 of appendix 5.5.3.2 of Standard Operation Manual of Estate Quality Management System documents. The communication flow charts were available on the notice boards in the Estate and Mill offices and Muster Grounds. All 3 Estates and Mill continued to maintain the stakeholders list which included the contractors, vendors/suppliers, government agencies, schools, local communities, etc. SDPSB 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 http://plantation.simedarby.com . |
| | 1.1.2 | Records of requests for information and responses shall be maintained. Major Compliance | YES | Records of communication were identified and maintained in different files, internal & external communication, depending on the stakeholder. |
| C 1.2 Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. | 1.2.1 | Land titles/user rights | YES | There was no change in the land ownership / user right. Copies of land titles, which indicate the use right were reviewed. Original copies of land titles maintained kept in Head Office. |
| | | Occupational health and safety plans | YES | All 3 estates and the mill in Tennamaram SOU have established the Safety and Health plan. The SDPB OHS Policy is also available at all the operating units. The policy is available in both Bahasa Malaysia and English. The policy has been communicated to all level of employees through briefings/training coupled with display at all offices and prominent notice boards within the complex. |
| | | Plans and impact assessments relating to environmental and social impacts | YES | The management documents in relation to environmental plans and impact assessments were made available and maintained at all audited operating units. Management documents related to environmental plans and impact assessments were made available at all audited operating units. |
| | | HCV documentation summary | YES | HCV documentation maintained available. |
| | | Pollution prevention and reduction plans | YES | The list of waste generated from estate and mill activities maintained available. All sources of pollution have been identified by management. Mitigation measure and action taken also made available. Among of activities covered include nursery, growing, drainage, planting, fertilizing, scheduled waste management and mill operation. |
| | | Details of complaints and grievances | YES | Details of complaints can be written in the Complaints Book and to be resolved in accordance with the Complaint & Grievances Resolution Procedure. Noted that no complaint and grievances was observed. |
| | | Negotiation procedures | YES | Negotiation procedure for the SOU Tennamaram is contained in the Flowchart and Procedures On Handling Land Dispute. |

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| Clause | Indicators | | Comply Yes/No | Findings |
|---|------------|---|---------------|--|
| | | Continual improvement plans | YES | The continual improvement plans were available. They were being maintained and updated with the assistance and guide personnel from Sustainability Department. Sime Darby Plantation Berhad is committed to utilise the established system to regularly monitor and review their key activities at the mill and estates. Relevant action plans were initiated to continuously improve its key areas of operations, environmental, safety, health and welfare of the workers as well as social contribution to the community. |
| | | Public summary of certification assessment report; | YES | The Public summary is available in website: http://www.sirim-qas.com.my/our-services/sustainability/roundtable-on-sustainable-palm-oil-rspo-supply-chain#1472111810358-2148a66d-0c2b |
| | | Human Rights Policy | YES | The CU subscribes to SDPB's Social & Humanity Management Policy dated Jan 2015. The policy was signed by the SDPB's Managing Director and are being displayed on various notice boards at the Mill and the estates offices. The policy states among other things, that the business is to be carried out with a sense of humanity, ensuring they are socially beneficial and do not infringe on basic human rights is publicly available and displayed at the estate notice boards. |
| C 1.3 Growers and millers commit to ethical conduct in all business operations and transactions. | 1.3.1 | There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. Minor Compliance | YES | The SOU 6 Tennamaram subscribes to Sime Darby Plantations Sdn Bhd's Code of Business Conduct (COBC). It contains, among others, the following aspects of business conduct Equal opportunity and non-discrimination, Criminal activities, Harassment ad violence, Avoiding conflicts of interests, Guarding against bribery and corruption, How to report a violation, Anti money laundering and anti-terrorism financing. |

Principle 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

| Clause | Indicators | | Comply Yes/No | Findings |
|---|------------|---|---------------|--|
| C 2.1 There is compliance with all applicable local, national and ratified international laws and regulations. | 2.1.1 | Evidence of compliance with relevant legal requirements shall be available. Major Compliance | NO | The CU maintains its compliance with most of relevant legal requirements. However, during the audit at Tennamaram and Bukit Talang Estates, it was found that Tennamaram and Bukit Talang Estates did not comply with relevant legal requirements under the following legal provisions: Immigration Act 1959/63 (Tennamaram Estate), Immigration Regulations 1963 (Tennamaram Estate) and Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000 (Bukit Talang Estate). As this was a Recurrence Major the RZ 05 2018 was issued against SOU 6 Tennamaram and accordingly, the recommendation for suspension has made by the LA. |
| | 2.1.2 | A documented system, which includes written information on | YES | The CU had identified, documented and maintained their legal register with written information on legal requirements which related to their operation in legal register entitled "Legal Requirement |

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| Clause | Indicators | | Comply Yes/No | Findings |
|---|------------|--|---------------|--|
| | | legal requirements shall be maintained. Minor Compliance | | Register" (LORR). The PSQM Department is responsible to track changes and the information was disseminated to all its estates and mills |
| | 2.1.3 | A mechanism for ensuring compliance shall be implemented. Minor Compliance | YES | PSQM Department and respective operating unit will collectively undertake the responsibility of identifying, managing, updating and tracking the legal requirements as well as monitoring the status of legal compliance. Evaluation of the legal requirements and its compliance are monitored by each operating unit. Additionally, internal audits were also carried out to ensure compliance. |
| | 2.1.4 | A system for tracking any changes in the law shall be implemented. Minor Compliance | YES | The PSQM Department of HQ is responsible to track changes and the information was disseminated to all its estates and mills |
| C 2.2 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. | 2.2.1 | Documents showing legal ownership or lease, history of land tenure (confirmation from community leaders based on history of customary land tenure, recognised NCR land) and the actual legal use of the land shall be available. Major Compliance | | Evidence of legal ownership of the land including history of land tenure was verified during this audit. For Tennamaram, Sungei Buloh and Bukit Talang Estate the land was previously owned by Kumpulan Guthrie Berhad and Golden Hope. It was then transferred to Sime Darby after the merger in 2007. Kumpulan Guthrie Berhad and Golden Hope has bought the land from Selangor State government since 26 July 1924. |
| | 2.2.2 | There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and reserves. Minor Compliance | YES | Auditor has verified the boundary stone and pegs at Tennamaram, Sungei Buloh estate and Bukit Talang Estate. The boundary pegs/trenching were visible along the boundary adjacent to another plantation area. |
| | 2.2.3 | Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with FPIC. Minor Compliance | YES | As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by SOU Tennamaram since 26 July 1924. The audit team had confirmed that there were no disputes. |
| | 2.2.4 | There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes are implemented and accepted by the parties involved. Major Compliance | YES | As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by SOU Tennamaram since 26 July 1924. The audit team had confirmed that there were no issues of land conflict. |
| | 2.2.5 | For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a | YES | As reported in 2.2.1, it has been verified that there is no conflict or dispute over the land. |

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| Clause | Indicators | | Comply Yes/No | Findings |
|---|------------|--|---------------|---|
| | | participatory way with involvement of affected parties. Minor Compliance | | |
| | 2.2.6 | To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations. Major Compliance | YES | As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by SOU Tennamaram since 26 July 1924. It was also confirmed that there is no evidence that the oil palm operations have instigated violence in maintaining peace and order in their current and planned operations. |
| C 2.3 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. | 2.3.1 | Maps of an appropriate scale showing the extent of recognised legal, customary or user rights shall be developed through participatory mapping involving affected parties. Major Compliance | YES | As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by SOU Tennamaram since 26 July 1924. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. Hence, there was no map showing the legal, customary, or user right of other users since 26 July 1924. |

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| Clause | Indicators | Comply Yes/No | Findings |
|--------|------------|---------------|--|
| | 2.3.2 | YES | There was no land dispute issue with any of the neighbouring private oil palm plantations. As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by SOU Tennamaram since since 26 July 1924. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. Hence, there was no map showing the legal, customary, or user right of other users since 26 July 1924. |
| | 2.3.3 | YES | As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to SOU Tennamaram. |
| | 2.3.4 | YES | As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to SOU Tennamaram. |

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Principle 3: COMMITMENT TO LONG-TERM ECONOMIC AND FINANCIAL VIABILITY

| Clause | Indicators | | Comply Yes/No | Findings |
|---|------------|---|---------------|---|
| C 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability. | 3.1.1 | A business or management plan (minimum three years) shall be documented That includes, where appropriate, a business case for scheme smallholders. Major Compliance | YES | The CU continued to make commitment to long-term economic and financial viability. The annual budgets for 2017/18 to 2022/2023 which included Capital and Operating Expenditures in addition to FFB yield/Ha, OER and CPO were sighted. The budget provisions cover activities for machinery and plant upkeep, expenditure for mature and immature oil palm upkeep, harvesting and evacuation, welfare, capital expenditure, RSPO compliance etc. |
| | 3.1.2 | An annual replanting programme projected for a minimum of five years with yearly review, shall be available. Minor Compliance | YES | Records showed that SDPB has a long-range replanting programme (LRRP) projected until 2036/2037. This programme is reviewed once a year and is incorporated in the CU annual financial budget. |

Principle 4: USE OF APPROPRIATE BEST PRACTICES BY GROWERS AND MILLERS

| Clause | Indicators | | Comply Yes/No | Findings |
|---|------------|--|---------------|---|
| C 4.1 Operating procedures are appropriately documented, consistently implemented and monitored. | 4.1.1 | Standard Operating Procedures (SOPs) for estates and mills shall be documented. Major Compliance | YES | SOU Tennamaram continued to use and implement SOPs for each of the processes. Brief version of the SOPs was displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had the established SOPs. The ARM included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. |
| | 4.1.2 | A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance | NO | The regular mechanisms used by Tennamaram CU are internal audits conducted by PSQM. The most recent internal audit for SOU 6 Tennamaram was carried out from in Oct to Nov 2018 where the report identified several non-implementations of procedures. However, it was found that there is no consistent implementation of the following procedures: <ul style="list-style-type: none"> - Sime Darby Berhad's Human Rights Charter and Vendor Code of Business Conduct (COBC). - There is no mechanism to check the consistent implementation of contractual obligations with a Vendor. - Water table monitoring of Section 10 of the Agriculture Reference Manual on water table in coastal estates or peat areas was not complied with. Therefore, a Minor Non-Compliance RZ 04 2018 was raised. |
| | 4.1.3 | Records of monitoring and any actions taken shall be maintained and available, | NO | Records of monitoring and actions taken by the estates continued to be maintained. This is to ensure that the established procedures were consistently implemented. Records of |

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| Clause | Indicators | | Comply Yes/No | Findings |
|--|------------|--|---------------|---|
| | | as appropriate. Minor Compliance | | monitoring and actions taken by all 3 estates were maintained and kept for a minimum of 12 months. Among the records sighted at the estates included Work Program Sheets, Field cost books, Bin cards, Harvesting Intervals, Monthly Progress & Report Account, rainfall data, etc. Harvesting standards were monitored using SDSB's Plantation Micro Macro Program (PMMP). One of the records sighted was the weekly housing inspection carried out at Sg Buloh Estate. However, it was noted that although weekly monitoring were being carried out, there was no evidence of any remedial action taken on recurring issues identified in the housing inspection reports. Therefore, a Minor NC RZ 03 2018 was raised. |
| | 4.1.4 | The mill shall record the origins of all third-party sourced FFB. Major Compliance | YES | FFBs are supplied from SDPB owned estates which are certified to RSPO. There is no third-party FFB sent to the mil, therefore this indicator is not applicable. |
| C 4.2 Practices maintain soil fertility at or, where possible, improve oil fertility to a level that ensures optimal and sustained yield. | 4.2.1 | There shall be evidence that good agriculture practices, as contained in SOPs, are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance | YES | All 3 estates practiced the maintenance of long-term soil fertility by annual application of fertilisers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and some EFB and compost application. Fertilizer application, which was of paramount importance for maintenance of soil fertility, were carried out based on the recommendation made by the agronomist. Annual fertilizer recommendations were made based on annual foliar sampling while soil sampling was carried out on a 5 year cycle basis. The recommendation by the Agronomist were also available during the inspection and the application of fertilizers had been carried out as recommended and scheduled. |
| | 4.2.2 | Records of fertiliser inputs shall be maintained. Minor Compliance | YES | Fertilizer application program was monitored using the program sheets, bin cards, field cost book, etc. Records of programs and applications of fertilizers were made available to auditors. |
| | 4.2.3 | There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance | YES | Periodic tissue and soil sampling were carried out in the Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitor the changes in the organic carbon and total nitrogen. |
| | 4.2.4 | A nutrient recycling strategy shall be in place, and may include use of EFB, POME, and palm residues. Minor Compliance | YES | All 3 Estates 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 Solid POME. In addition, during replanting, palms were felled, chipped, windrowed and left to decompose. |
| C 4.3 Practices minimise and control erosion and degradation of soils. | 4.3.1 | Maps of any fragile/marginal soils shall be available. Major Compliance | YES | New soils maps prepared in Nov 2018 Precision Agriculture Unit of Sime Darby Research unit shows that there are no fragile soils in all 3 Estates. Peat soils areas shown in previous maps is now identified as not peat soils. |
| | 4.3.2 | A management strategy shall be in place for plantings on slopes between 9 and 25 degrees unless specified otherwise by the company's SOP. Minor Compliance | YES | Like all SDPB Estates, the Estates in visited in SOU Tennamaram continued to have a management strategy for planting on slopes in order to minimise and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by: Slope & River Protection Policy, Buffer Zone & 25 degree slope, Land Preparation for Terracing in ARM Manual. |

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| Clause | Indicators | | Comply Yes/No | Findings | | | | | | | | | | | | |
|--|---|--|---|---|-------------|-------------|-------------|-----------|----------------|-----------|----------------|-----------|---------------|-----------|------------|----------|
| | 4.3.3 | A road maintenance programme shall be in place. Minor Compliance | YES | During the field visit, it was noted that road conditions were well maintained in all 3 Estates. Accessibility were made possible by regular maintenance guided by its road maintenance programmes. The program had been supported by adequate provisions in the budgets. Surface run off water from roads were well directed into fields and drains with well cambered roads, road sided drains and silt pits. All estates had hired backhoes for road maintenance. The estates had mid-mounted and tractor drawn rollers and back-buckets. For resurfacing, the estates had purchased stones. Heaps of this was sighted at strategy points in all 3 estates. | | | | | | | | | | | | |
| | 4.3.4 | Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. Major Compliance | YES | This indicator is now Not Applicable as there are no peat soils in SOU Tennamaram based on the new soils map provided by Precision Agriculture Unit of Sime Darby Research | | | | | | | | | | | | |
| | 4.3.5 | Drainability assessments where necessary will be conducted prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. Minor Compliance | YES | This indicator is now Not Applicable based on the new soils map provided by Precision Agriculture Unit of Sime Darby Research there are no peat soils in SOU Tennamaram. | | | | | | | | | | | | |
| | 4.3.6 | A management strategy shall be in place for other fragile and problem soils. Minor Compliance | YES | Based on the new soils map provided by Precision Agriculture Unit of Sime Darby Research there are no fragile or problem soils in SOU Tennamaram. | | | | | | | | | | | | |
| C 4.4 Practices maintain the quality and availability of surface and ground water. | 4.4.1 | An implemented water management plan shall be in place. Minor Compliance | YES | All 3 estates had in place and implemented water management plans. Plans for 2017/18 were sighted. The water management plans were tailored towards how to reduce rain water collection, to Improve user awareness and domestic use. | | | | | | | | | | | | |
| | 4.4.2 | Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones shall be demonstrated. Major Compliance | YES | SOU Tennamaram 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. The buffer zones established are as follows: <table><tr><th>River width</th><th>Buffer zone</th></tr><tr><td>> 40 meters</td><td>50 meters</td></tr><tr><td>20 - 40 meters</td><td>40 meters</td></tr><tr><td>10 - 20 meters</td><td>20 meters</td></tr><tr><td>5 - 10 meters</td><td>10 meters</td></tr><tr><td>< 5 meters</td><td>5 meters</td></tr></table> | River width | Buffer zone | > 40 meters | 50 meters | 20 - 40 meters | 40 meters | 10 - 20 meters | 20 meters | 5 - 10 meters | 10 meters | < 5 meters | 5 meters |
| | River width | Buffer zone | | | | | | | | | | | | | | |
| > 40 meters | 50 meters | | | | | | | | | | | | | | | |
| 20 - 40 meters | 40 meters | | | | | | | | | | | | | | | |
| 10 - 20 meters | 20 meters | | | | | | | | | | | | | | | |
| 5 - 10 meters | 10 meters | | | | | | | | | | | | | | | |
| < 5 meters | 5 meters | | | | | | | | | | | | | | | |
| 4.4.3 | Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national reg. Minor Compliance | YES | The license indicated the mill capacity as 60mt/hr, and the discharge method of the POME treatment plant is land application. Monitoring of the final discharge was carried out on monthly basis. The result were within the limit. | | | | | | | | | | | | | |

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| Clause | Indicators | | Comply Yes/No | Findings |
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| | 4.4.4 | Mill water use per tonne of FFB shall be monitored. Minor Compliance | YES | Mill water usage per tonne of FFB continued to be monitored on monthly basis. |
| C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques. | 4.5.1 | Implementation of Integrated Pest Management (IPM) plans shall be monitored. Major Compliance | YES | As for all SDPSB estates, Tennamaram Estate, Bukit Talang Estate and Sungai Buloh Estate had in place documented IPM systems. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. The IPM technique for rats includes rearing barn owls (<i>tyto alba</i>), bagworm control includes the planting of beneficial plants such as <i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Turnera sublata</i> and for rhino beetles is by using pheromone trap. |
| | 4.5.2 | Training of those involved in IPM implementation shall be demonstrated. Minor Compliance | YES | Trainings on IPM implementation evident. |
| C 4.6 Pesticides are used in ways that do not endanger health or the environment. | 4.6.1 | Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. Major Compliance | YES | Written justification in Standard Operating Procedure of all agrochemical was available. The Manual has included a chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The use of selective products that are specific to the target pest, weed or disease were demonstrated in the Agricultural Reference Manual. |
| | 4.6.2 | Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) shall be provided. Major Compliance | YES | All 3 Estates continued to have records to show the types of pesticides used with active ingredients and their LD50, where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available for verification. |
| | 4.6.3 | Any use of pesticides shall be minimised as part of a plan, and in accordance with IPM plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice. Major Compliance | YES | All 3 Estates continued to minimize the usage of agrochemicals by implementing IPM. Blanket spraying was not practiced by this CU and soft grasses maintained in the field. It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM). |
| | 4.6.4 | 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 | YES | All 3 estates only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register, it was noted that all pesticides used are of class III & class IV. The use of paraquat had been banned in |

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| Clause | Indicators | Comply Yes/No | Findings |
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| | not used, except in specific situations identified in industry's Best Practice. The use of such pesticides shall be minimised and/or eliminated as part of a plan, and shall only be used in exceptional circumstances. Pesticides selected for use are those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Reg. (2000). Minor Compliance | | all SDPSB estates. There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions had been used. |
| 4.6.5 | Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers. Major Compliance | YES | Records showed that pesticides were handled, used and applied by trained persons and as per the MSDS of the pesticide. The staffs and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the MSDS/CSDS training. It was also noted that MSDS/CSDS are available at all sites during the audit. |
| 4.6.6 | Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes. Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Reg. Major Compliance | YES | The chemical stores in all 3 estates were observed to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. Records of the purchase, storage and use had been properly maintained. All of the stores were equipped with exhaust fans and secured. Only authorized personnel are allowed to handle the chemicals. All the chemicals were stored and segregated accordingly. The class 1b chemical, Methamidophos, was no more used as SDPB had changed it to Acephate, which is class III chemical. Empty pesticides containers had been triple-rinsed, holes punched in them and stored separately in the scheduled waste store. |
| 4.6.7 | Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance | YES | Pesticide applications were guided by SDPB's ARM, Pictorial Guide, CHRA and by MSDS supplied by the manufacturer. The CHRA on all 3 estates was conducted by competent person from NIOSH Malaysia. |
| 4.6.8 | Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant info within reasonable time prior to application. Major Compliance | YES | Aerial spraying is not a practice in all SDPB estates. There was no evidence to show that such a method being used in Tennamaram, Sungai Buloh and Bkt. Talang Estates. |
| 4.6.9 | Evidence of continual training to enhance knowledge and skills of employees and | YES | The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals |

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| Clause | Indicators | | Comply Yes/No | Findings | | | | | | | | | | | | | | | | | | | | |
|--|------------------|---|---|--|--|---------------|-------------|--------------------|---|-----------------|------------|---|---|----------------|---------------|--|---|------------------|-------------|-------------------------|--|--|----------|--|
| | | associated smallholders on pesticide-handling shall be demonstrated or made available. Minor Compliance | | should be used in a safe manner. Records showed that training had been carried out. | | | | | | | | | | | | | | | | | | | | |
| | 4.6.10 | Proper disposal of waste material, according to procedures that are fully-understood by workers and managers shall be demonstrated. Minor Compliance | YES | <p>The Waste Management Plan for 2018 has been established. Details are shown below. The practices in managing the waste are common to all the units in the SOU. Guidelines are assisted by PSQM personnel.</p> <table><tr><td></td><td>Type Of Waste</td><td>Description</td><td>Action To Be Taken</td></tr><tr><td>1</td><td>Scheduled Waste</td><td>SW 409/430</td><td>Recycling Program / Collection by SDI / Disposal Through Authorised Buyer</td></tr><tr><td>2</td><td>Domestic Waste</td><td>General Waste</td><td>Collection by MDKS twice/thrice weekly</td></tr><tr><td>3</td><td>Industrial Waste</td><td>Scrap metal</td><td>Sale to approved buyer.</td></tr><tr><td></td><td></td><td>EFB/POME</td><td>Disposed in the field as mulch /land application</td></tr></table> | | Type Of Waste | Description | Action To Be Taken | 1 | Scheduled Waste | SW 409/430 | Recycling Program / Collection by SDI / Disposal Through Authorised Buyer | 2 | Domestic Waste | General Waste | Collection by MDKS twice/thrice weekly | 3 | Industrial Waste | Scrap metal | Sale to approved buyer. | | | EFB/POME | Disposed in the field as mulch /land application |
| | Type Of Waste | Description | Action To Be Taken | | | | | | | | | | | | | | | | | | | | | |
| 1 | Scheduled Waste | SW 409/430 | Recycling Program / Collection by SDI / Disposal Through Authorised Buyer | | | | | | | | | | | | | | | | | | | | | |
| 2 | Domestic Waste | General Waste | Collection by MDKS twice/thrice weekly | | | | | | | | | | | | | | | | | | | | | |
| 3 | Industrial Waste | Scrap metal | Sale to approved buyer. | | | | | | | | | | | | | | | | | | | | | |
| | | EFB/POME | Disposed in the field as mulch /land application | | | | | | | | | | | | | | | | | | | | | |
| | 4.6.11 | Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. Major Compliance | YES | <p>Specific annual medical surveillance for relevant operators such as Lab operator, Lab sampler, Biogas lab operator, Storekeeper, Boiler operator, Workshop operator, Kernel operator, Scheduled waste operator, Water treatment plant operator, General cleaning operator, Diesel pump operator, Sprayer & Housekeeping operator were evident, It has been carried out by competent 3rd party and results from assessment confirmed that all workers fit to work.</p> <p>Sighted a record of medical surveillance conducted in Aug 2018 for 53 employees exposed to chemical. 15 cases have been detecting with high cholinesterase. All workers immediately to change from sprayer job to upkeep workers.</p> <p>However, 1 worker was found doing P&D spraying in Nov 2018 at the oil palm nursery, Bukit Talang Estate after a medical practitioner had certified that he was unfit for spraying. This contravenes Section 28(1) Occupational Safety and Health (USECHH) Regulations. Thus the Major (Recurrent) NCR RZ 05 2018 was issued under Indicator 2.1.1.</p> | | | | | | | | | | | | | | | | | | | | |
| | 4.6.12 | No work with pesticides shall be undertaken by pregnant or breast-feeding women. Major Compliance | YES | <p>All 3 Estates had Internal Memos “No Work with Pesticides for Confirmed Pregnant and Breast-Feeding Women” signed by the respective managers. List of sprayers were maintained by Medical Assistant. Identification of pregnancy and breastfeeding was done by the MAs and HAs based on interview with women workers on the last period date and examination of lactation. This interview is done during the monthly medical check-up conducted, including for breastfeeding. Doubtful cases were sent to the Visiting Medical Officer for pregnancy test. There was no evidence that work with pesticides was undertaken by pregnant or breastfeeding women.</p> | | | | | | | | | | | | | | | | | | | | |
| C 4.7 An occupational health and safety plan is documented, effectively | 4.7.1 | An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. Major Compliance | YES | <p>Group Occupational Safety & Health Management Policy had been established and implemented. The policy was signed by the Managing Director of Sime Darby Plantation dated Jan 2015 and is displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the Regional PSQM Executives and monitored by PSQM Department at Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors.</p> | | | | | | | | | | | | | | | | | | | | |

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| Clause | Indicators | | Comply Yes/No | Findings |
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| comm. & implemented. The occupational health & safety plan shall cover the following: | 4.7.2 | All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance | YES | HIRARC has been established with the latest review carried out in July – Nov 2018 for the CU. All relevant actions were properly documented and evident. |
| | 4.7.3 | All workers involved in the operation shall be adequately trained in safe working practices. Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. Major Compliance | YES | Workers were provided with the necessary safe working practices. Appropriate PPEs have been identified through the HIRARC exercise and have been provided accordingly to the concerned workers. PPE issuance records were maintained. During visit to the field, noted that workers were using the issued PPE. Monitoring via Personal Protective Equipment Card – verified. |
| | 4.7.4 | The responsible person/s shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. Major Compliance | YES | Appointment of the PICs were evident; Estate & Mill Managers were appointed as the Chairman for their ESH Committee. Among the agenda discussed were related with finding from workplace inspection, unsafe condition during field maintenance, incident case and area for improvement, accident report, waste management, etc |
| | 4.7.5 | Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. Minor Compliance | YES | Accident and Emergency procedures have been established, each estates and mill had procedures for handling of fire & flood, chemical spillage & motor vehicle, wild & poisonous animal attack, first aid team. There are formation of ERP Team & ERP for all the identified incidences. The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were produced by PSQM and amended to tailor to the situation differences in the estates and mills. Sighted training conducted by the estates & mill. |
| | 4.7.6 | All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance | YES | CU continues to provide group insurance for all foreign workers as required under the Workmen Compensation Act 1992. Sighting of records and cross check with workers showed that they were covered with valid insurance policy. Local workers are covered by SOCSO. |

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| Clause | Indicators | | Comply Yes/No | Findings |
|---|------------|--|---------------|---|
| | 4.7.7 | Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance | YES | Records of all accidents are kept in all and mill. Incidences are recorded using LTA Lost Time Accident. Cases if any are reviewed during safety meetings. Sighted (JKKP 8) form has been submitted to DOSH in Jan 2018. |
| C 4.8 All staff, workers, smallholders and contract workers are appropriately trained. | 4.8.1 | A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. Major Compliance | YES | Formal training programs for 2017/18 that covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs were available for all the audited sites. Training Plan was for each operating units were established. A training need identification matrix has been established with target dates for the training identified. The training program includes: ESH Legal & Other requirements, Safe handling of electrical equipment, USECHH 2000, Accident Investigation Techniques, Milling & Estates Activities Training. |
| | 4.8.2 | Records of training for each employee shall be maintained. Minor Compliance | YES | Tennamaram SOU continued to train its executives, staff and workers. Records of training were kept in the training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue. Some Details of training were Hearing conservation training, refresher first aid training and first aid boxes training, ESH committee function etc. |

Principle 5: ENVIRONMENTAL RESPONSIBILITY AND CONSERVATION OF NATURAL RESOURCES AND BIODIVERSITY

| Clause | Indicators | | Comply Yes/No | Findings |
|--|------------|--|---------------|---|
| C 5.1 Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented | 5.1.1 | An environmental impact assessment (EIA) shall be documented. Major Compliance | YES | The CU has established its environmental aspects/impacts register associated with their activities. Environmental aspect and impact which covers from upstream activities such as FFB reception until downstream processes was sighted during assessment. Identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the significant environmental aspects are the boiler stack emission which is associated with air emission, palm oil mill effluent (POME) discharge (water pollution) and land contamination which related to the management of scheduled wastes and general waste. For estate operations, all activities from harvesting, pest and disease, upkeep programs until delivery to mill have been identified. |
| | 5.1.2 | Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be dev. & implemented within a comprehensive action plan. The action plan shall identify the responsible person/s. Minor Compliance | YES | Significant environmental aspect and impact was derived from the environmental impact evaluation (EIE) and captured in the 'Pollution Prevention Plan'. Those activities evaluated as significant were monitored using the mitigation measure established for each significant activities. Sighted wastewater management plan and waste management plan developed for the CU. The management has periodically reviewed the implementation and effectiveness of the established program. |

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| Clause | Indicators | | Comply Yes/No | Findings |
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| and monitored, to demonstrate continual improvement. | 5.1.3 | This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a min every 2 yrs. to reflect the results of monitoring and where there are operational changes that may have positive and negative env. impacts. Minor Compliance | YES | <p><u>Tennamaram POM</u> No changes were made to the environmental aspects and impacts or current practices which require changes in the environmental action plans at POM. Nevertheless, the existing environmental action plans had identified timeframes and responsible person at each operating unit assessed: BOD final discharge, Reduce water consumption and Reduce electricity consumption.</p> <p><u>Estates</u> An environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. Pollution prevention plan and waste management plan was reviewed on yearly basis and was verified at all visited operating units. Sighted and extracted the following environmental management plan for Tennamaram, Sungai Buloh, and Bukit Talang Estate 2017/18. FY2017/18 performance was verified and noted to be satisfactory</p> |
| C 5.2 The status of rare, threatened or endangered species other High | 5.2.1 | Information shall be collated in a HCV assessment that incl. both the planted area itself & relevant wider landscape-level considerations. Major Compliance | YES | The CU has conducted assessment on HCV in June 2014. The report titled 'HCV Re-Assessment For Selangor Central Zone: Strategic Operating Unit SOU 6 Tennamaram and SOU 7 Bukit Kerayong' dated December 2015. The total area of HCV area for SOU Tennamaram is 3.26 ha HCV area. Bukit Talang Estate is adjacent with peat swamp forest named Raja Musa Forest Reserve. |
| Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced. | 5.2.2 | Where RTE species, or HCVs, are present or are affected by plantation or mill op. approp. measures that are expected to maintain and/or enhance them be implemented through an action plan. Major Compliance | YES | No RTE species found in the Tennamaram SOU. The HCV areas within Tennamaram SOU were as explained in Indicator 5.2.1. However SOU Tennamaram still maintain the plan for HCV area. |
| | 5.2.3 | There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instituted in accordance with company rules and | YES | Although there was no RTE species found in the CU, Sime Darby still established their own disciplinary measures if any of their staff or workers found to capture, harm, collect or kill the RTE species. In all estates, the training programs for 2018/2019 has included HCV training programme. Attendance lists were available and verify by auditor. SOU Tennamaram management will notify the relevant authorities immediately if any individual working for the company is found to capture, harm, collect or kill these species or If found any activities to capture, harm, collect or kill RTE species, the estates will make a report to the Wildlife Department immediately. |

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| Clause | Indicators | | Comply Yes/No | Findings |
|--|------------|--|---------------|---|
| | | national law if any individual working for the company is found to capture, harm, collect or kill these species. Minor Compliance | | |
| | 5.2.4 | Where an action plan has been created there shall be ongoing monitoring: The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; Outcomes of monitoring shall be fed back into the action plan. Minor Compliance | YES | Progress of implementation of the action plans 'HCV Action Plan 2017/2018 – for Bukit Talang, Sungei Buloh Estate and Tennamaram Estate' were reviewed and verified on the ground. The SOU has conducted an on-going monitoring of their HCV4 for Tennamaram Estate, noted that no RTE species were found within the estates area. |
| | 5.2.5 | Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. Minor Compliance | YES | Local communities that lived nearby to the CU did not depend on the HCV area for their living needs. Therefore, this indicator was not applicable to this Certification Unit. |
| C 5.3 Waste is reduced, recycled, re-used, and disposed of in an environmentally and socially responsible manner. | 5.3.1 | All waste products and sources of pollution shall be identified and documented. Major Compliance | YES | SOU Tennamaram has identified all wastes and sources of pollution. The Waste Management Action Plan FY 2017/2018 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were: Air – sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping – biogas emission)- GHG , Water – cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blowdown. Land – scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste. |
| | 5.3.2 | All chemicals and their containers shall be disposed of responsibly. Major Compliance | YES | It has been verified that the domestic waste for line site and office has been disposed through Majlis Daerah Kuala Selangor. Compliance to EQ (Scheduled Wastes) Reg. 2005 evident. |
| | 5.3.3 | A waste management and | YES | Waste management and disposal plan to avoid or reduce pollution had been documented and |

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| Clause | Indicators | | Comply Yes/No | Findings |
|---|------------|---|---------------|--|
| | | disposal plan to avoid or reduce pollution shall be doc. & implemented Minor Compliance | | implemented as discussed in Indicator 5.1.3 above. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution on the routine operation. Mill wastes had been disposed as follows; EFBs were sent for mulching in the field, while crop residue/biomass i.e. fiber and shell were used as fuel in the boiler. On the monitoring of water and effluent discharge, a monthly and quarterly report for final discharge were submitted to DOE in a timely manner, as required by the written approval. |
| C 5.4 Efficiency of fossil fuel use and the use of renewable energy is optimised. | 5.4.1 | A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. Minor Compliance | YES | 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 2017, identified in the following i) Environmental Aspect Identification Summary FY 2017 / 2018 reviewed accordingly. ii) Environmental Impact Evaluation Summary FY 2017 / 2018 reviewed accordingly. |
| C 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice | 5.5.1 | There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Major Compliance | YES | SDPB has a policy of no open burning. As advocated, all 3 estates practiced Zero burning. In the 2016, 2017 and 2018 replants visited during the audit. It was evident that all palms were felled, shredded, windrowed and left to decompose. |
| | 5.5.2 | Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Minor Compliance | YES | There was no evidence fire has been used for preparing land for replanting in all 3 estates. The estates had adhered to the Zero Burning Policy of SDPB. |
| C 5.6 Preamble Growers and millers commit to reporting on operational greenhouse gas emissions. However, it is | 5.6.1 | An assessment of all polluting activities shall be conducted, incl. gaseous emissions, particulate/soot emissions and effluent. | YES | An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. '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. |
| | 5.6.2 | Significant pollutants and greenhouse gas (GHG) emissions shall be | YES | Pollution Identification Environmental improvement action plan' – is used to identify the waste products and sources of pollution and actions taken to mitigate and reduce them are in place and are being reviewed accordingly. |

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| Clause | Indicators | | Comply Yes/No | Findings | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----------------|--|------------------|--|-----------------------|----------------|------------|---|-----|-----|-----|-------|----|-----|-----|------|------------|------|---------------|-----------|--------------|----------|----------|----|-----------------|----------|--------------------|---------|-------------------------|---|-----------------------------|---|-------|----------|--|----------|--|-------|--|--|-------|------------|-------|------------|-----------|--|--|--|--|-----------------|----------|-----|---------|
| recognised that these significant emissions cannot be monitored completely or measured accurately with current knowledge and methodology. It is also recognised that it is not always feasible or practical to reduce or minimise these emissions. Growers and millers commit to an implementation period until the end of December 2016 for promoting best practices in reporting to the RSPO, and thereafter to public reporting. Growers and millers make this commitment with the | | identified, and plans to reduce or minimise them implemented. Major Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 5.6.3 | A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. Minor Compliance | YES | <p>SOU Tennamaram has calculate GHG using RSPO Palm GHG calculator and use the Option 2</p> <p><u>Summary of Net GHG Emissions</u></p> <table><tr><th>Emissions per Product</th><th>tCO2e/tProduct</th><th>Extraction</th><th>%</th></tr><tr><td>CPO</td><td>1.6</td><td>OER</td><td>19.95</td></tr><tr><td>PK</td><td>1.6</td><td>KER</td><td>5.41</td></tr></table> <table><tr><th>Production</th><th>t/yr</th></tr><tr><td>FFB Processed</td><td>259244.13</td></tr><tr><td>CPO Produced</td><td>51723.38</td></tr></table> <table><tr><th>Land Use</th><th>ha</th></tr><tr><td>OP planted area</td><td>25697.57</td></tr><tr><td>OP planted on peat</td><td>712.159</td></tr><tr><td>Conservation (forested)</td><td>0</td></tr><tr><td>Conservation (non-forested)</td><td>0</td></tr><tr><td>Total</td><td>25697.57</td></tr></table> <p><u>Summary of Field Emissions and Sinks</u></p> <table><tr><td></td><td colspan="2">Own Crop</td><td colspan="2">Group</td></tr><tr><td></td><td>tCO2e</td><td>tCO2e/tFFB</td><td>tCO2e</td><td>tCO2e/tFFB</td></tr><tr><td>Emissions</td><td></td><td></td><td></td><td></td></tr><tr><td>Land Conversion</td><td>99745.58</td><td>0.4</td><td>4935.16</td><td>0.45</td></tr></table> | Emissions per Product | tCO2e/tProduct | Extraction | % | CPO | 1.6 | OER | 19.95 | PK | 1.6 | KER | 5.41 | Production | t/yr | FFB Processed | 259244.13 | CPO Produced | 51723.38 | Land Use | ha | OP planted area | 25697.57 | OP planted on peat | 712.159 | Conservation (forested) | 0 | Conservation (non-forested) | 0 | Total | 25697.57 | | Own Crop | | Group | | | tCO2e | tCO2e/tFFB | tCO2e | tCO2e/tFFB | Emissions | | | | | Land Conversion | 99745.58 | 0.4 | 4935.16 |
| Emissions per Product | tCO2e/tProduct | Extraction | % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CPO | 1.6 | OER | 19.95 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PK | 1.6 | KER | 5.41 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Production | t/yr | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| FFB Processed | 259244.13 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CPO Produced | 51723.38 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Land Use | ha | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| OP planted area | 25697.57 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| OP planted on peat | 712.159 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Conservation (forested) | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Conservation (non-forested) | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 25697.57 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Own Crop | | Group | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | tCO2e | tCO2e/tFFB | tCO2e | tCO2e/tFFB | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Emissions | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Land Conversion | 99745.58 | 0.4 | 4935.16 | 0.45 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| Clause | Indicators | | Comply Yes/No | Findings | | | | |
|---|------------|--|---------------|--|-----------|----------|------------|-------|
| support of all other stakeholder groups of the RSPO. Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored. | | | | *CO2 Emissions from Fertiliser | 9387.12 | 0.04 | 253.59 | 0.05 |
| | | | | **N2O Emissions | 13378.01 | 0.05 | 188.96 | 0.04 |
| | | | | Fuel Consumption | 1363.57 | 0.13 | 55.51 | 0.02 |
| | | | | Peat Oxidation | 31175.62 | 0.13 | 55.51 | 0.02 |
| | | | | Sinks | | | | |
| | | | | Crop Sequestration | -92479.27 | -0.37 | -4820.74 | -0.43 |
| | | | | Conservation Sequestration | 0 | 0 | 0 | 0 |
| | | | | Total | 62570.63 | 0.25 | 671.98 | 0.13 |
| | | | | Summary of Mill Emissions and Credits | | | | |
| | | | | | | tCO2e | tCo2e/tFFB | |
| | | | | Emissions | | | | |
| | | | | POME | | 40656.79 | 0.16 | |
| | | | | Fuel Consumption | | 96.84 | 0 | |
| | | | | Grid Electricity Utilisation | | 1418.61 | 0.01 | |

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| Clause | Indicators | | Comply Yes/No | Findings | | | |
|--------|------------|--|------------------|--|----------|------|------|
| | | | | Credits | | | |
| | | | | Export of Grid Electricity | 0 | 0 | |
| | | | | Sales of PKS | 0 | 0 | |
| | | | | Sales of EFB | 0 | 0 | |
| | | | | Total | 42172.24 | 0.16 | |
| | | | | Palm Oil Mill Effluent (POME) Treatment | | | |
| | | | | Divert to compost | | | 0% |
| | | | | Divert to anaerobic digestion | | | 100% |
| | | | | POME Diverted to Anaerobic Digestion: | | | |
| | | | | Divert to anaerobic pond | | | 100% |
| | | | | Divert to methane capture (flaring) | | | 0% |
| | | | | Divert to methane capture (electricity generation) | | | 0% |

Principle 6: RESPONSIBLE CONSIDERATION OF EMPLOYEES AND OF INDIVIDUALS AND COMMUNITIES BY GROWERS AND MILLERS

| Clause | Indicators | | Comply Yes/No | Findings |
|--|------------|--|---------------|---|
| C 6.1 Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and | 6.1.1 | A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance | YES | A Social Impact Assessment (SIA) covering 3 operating units namely Tennamaram Estate, Bukit Talang Estate and Sg Buloh Estate was carried out in June 2014 by the PSQM Unit of the Sime Darby Plantation. The SIA for the Tennamaram Palm Oil Mill on the other hand was carried out in March 2013 with the participation of internal and external stakeholders, namely workers, union, contractors, suppliers, local community, local government and private entities. Records of meetings with the relevant stakeholders were duly documented and sighted during this Surveillance Audit. |
| | 6.1.2 | There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance | YES | There is documentary evidence in the form of meeting attendances where workers, union, contractors, suppliers, local community, local government and private were present during the stakeholder consultations. The attendance sheets were duly sighted during this Surveillance Audit. |
| | 6.1.3 | Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation | YES | Action Plan for avoidance or mitigation of negative impacts and promotion of the positive ones are available for each unit. The Action Plan 2017/2018 for Bukit Talang Estate was dated 30 November 2017. Areas of concern/key findings were identified together with the action plan, person in charge and respective completion date. There is evidence that the areas of concern /key findings were developed with the consultation of affected parties. For example, these include complaints from |

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| Clause | Indicators | | Comply Yes/No | Findings |
|--|------------|--|---------------|---|
| promote the positive ones are made, implemented and monitored, to demonstrate continual improvement. | | with the affected parties, documented and timetabled, including responsibilities for implementation. Major Compliance | | workers on the issue of cows, bad road conditions near the workers' housing, installation of street lights at Kg Baru Division, floods affecting local communities, and rubbish collection by Majlis Daerah Kuala Selangor. The SIA Action Plan for Tennamaram Palm Oil Mill took into account concerns raised by NUPW relating to understanding of wage calculation. |
| | 6.1.4 | The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. Minor Compliance | NO | The Action Plans for all units within SOU 6 Tennamaram were reviewed at least once a year. However, it was found during the Surveillance Audit that impacts of replanting activities on affected parties such as workers, contractors, etc, were not identified. Additionally, the Social Management Plan of Sg Buloh Estate dated 1 Nov 2018 was reviewed without the participation of its stakeholders because the issues raised by the Gender Committee relating to PPE, request for vehicle for medical appointments, and installation of street lights were not incorporated into the Social Management Plan. Therefore, a Minor Non-Compliance RZ 02 2018 was raised. |
| | 6.1.5 | Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance | YES | There are no smallholders' scheme at SOU 6 Tennamaram and therefore this indicator is not applicable. |
| C 6.2 There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties | 6.2.1 | Consultation and communication procedures shall be documented. Major Compliance | YES | Consultation and communications procedures for SOU 6 Tennamaram was documented in the Standard Operating Manual dated 1 April 2008 entitled "Procedure for External Communications". This document was sighted during the audit. |
| | 6.2.2 | A management official responsible for these issues shall be nominated. Minor Compliance | YES | Management officials responsible for social issues were duly appointed. Their responsibilities include investigating social issues, maintain all records of complaints, provide advice and counselling on social issues and assist in organizing social activities and events. |
| | 6.2.3 | A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. Minor Compliance | YES | The list of stakeholders for SOU 6 Tennamaram was maintained at the respective unit offices. The stakeholders comprise contractors, vendors/suppliers, neighbouring estates/smallholders, government agencies, clinics, hospitals, etc. Records of communications which showed actions taken in response to inputs from stakeholders and efforts made to ensure understanding were documented and sighted during this Surveillance Audit. |
| C 6.3 There is a mutually agreed and documented system for dealing with | 6.3.1 | The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistle blowers, where requested. Major Compliance | YES | The system used by the SOU 6 Tennamaram in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Tatacara Perundingan Dalam Menangani Masalah Sosial". And, when ensuring anonymity of complainants and whistleblowers, the Sime Darby Code of Business Conduct provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ. |

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| Clause | Indicators | | Comply Yes/No | Findings |
|--|------------|--|---------------|--|
| complaints and grievances, which is implemented and accepted by all affected parties | 6.3.2 | Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance | YES | There is no record of any dispute at SOU 6 Tennamaram. However, documentary evidence was made available during the audit that complaints are being resolved and the outcome made available. |
| C 6.4 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. | 6.4.1 | A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. Major Compliance | YES | The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System document issued on 1 November 2008 (Version 1) entitled: <ul style="list-style-type: none"> • "Procedures for Handling Boundaries Disputes"; • "Procedures For Handling Squatters Dispute" (for land issues or ex-workers who remain in housing complex) |
| | 6.4.2 | A procedure for calculating and distributing fair compensation shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance | YES | In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures. |
| | 6.4.3 | The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. Major Compliance | YES | As of the date of this Surveillance Audit, no negotiation and payment of compensation has been carried out to any party and therefore this Indicator is not applicable. |

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| Clause | Indicators | | Comply Yes/No | Findings |
|---|------------|---|---------------|---|
| C 6.5 Pay and conditions for employees and contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages | 6.5.1 | Documentation of pay and conditions shall be available. Major Compliance | YES | Documentation of pay throughout SOU 6 Tennamaram is in the form of monthly pay slips given out to all employees. Conditions of pay on the other hand, are contained in the employees' respective employment contracts/letter of employment. Samples of the monthly pay slips and employment contracts/letters of employment were made available and reviewed during the audit. Each pay slip include the name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions (statutory such as EPF, SOCSO, EIS), net salary, number of days worked, annual leave and medical leave taken, etc. Interview with workers reveal that they understand the contents of the pay slips and would seek explanation whenever they needed clarifications. |
| | 6.5.2 | Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment shall be available in the languages understood by the workers or explained carefully to them by a management official. Major Compliance | YES | Contracts and conditions of employment are contained in employment contracts signed between the Mill and respective estates on one hand, and their workers on the other. The employment contracts sampled were prepared in either Bahasa Indonesia, or in dual-language, namely English and the language commonly used in the worker's country of origin. Among others, the contracts defined the period of employment, wage rate, work benefits, overtime, annual leave, public holidays, contract termination, etc. Details on monthly salary and deductions for every worker and staff are reflected in their pay slips which are issued to the workers during pay day. For the local workers, there is evidence that the payment of statutory contributions such as EPF, SOCSO and Employment Insurance Scheme are being made in accordance with the relevant legal provisions. |
| | 6.5.3 | Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible. Minor Compliance | YES | Visits were made to the workers' housing facilities of each estate reveal that generally, the Estates and Mills provide adequate housing to their employees. The houses are provided rent-free, with subsidized electricity and water by Tenaga Nasional Berhad and Syabas respectively, which are available 24 hours a day. The houses are generally well-maintained. Each house has between 2 – 3 rooms and generally, not more than 6 persons live in each house. They are also furnished with the basic necessities such as cupboard, mattresses, pillows and cooking facilities. Each house has three rooms and accommodate between 3 - 6 workers per house. Among the facilities provided include a surau, playing field, a kindergarten, creche, grocery shops and a clinic which is managed by a Medical Assistant and a support staff. A visiting Medical Officer comes for regular visits once a fortnight to assist with linesite inspections, dispensing medical advice and treating patients. Records of visits by VMO were sighted and verified. Other amenities available at the housing complexes of SOU 6 Tennamaram include football field, takraw/badminton court, grocery shop, dispensary, playground, surau, and temple. Housing inspection are conducted weekly, and records of Kuala Selangor Division housing inspection reports were also sighted and verified. |
| | 6.5.4 | Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and affordable food. Minor Compliance | YES | Generally, all units within SOU 6 Tennamaram are located near the towns. Workers have access to adequate, sufficient and affordable food from a grocery shop Bestari Jaya and Ijok, where affordable food are readily available. In addition, there is a grocery shop at Bukit Talang Estate housing complex. A vendor is allowed to come in daily to sell wet food items such as fish, vegetables to those who live at the housing complex. Workers who were interviewed also confirmed that the items are reasonably priced. |

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| Clause | Indicators | | Comply Yes/No | Findings |
|--|------------|--|---------------|--|
| C 6.6 The employer 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. | 6.6.1 | A published statement in local languages recognising freedom of association shall be available. Major Compliance | YES | Recognition of freedom of association is available in the Sime Darby Plantation Social Policy dated January 2015. The policy states that the company respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. This Social Policy is applicable throughout all operating units and is printed and translated in Bahasa Malaysia and were seen being displayed on all the office notice boards and at AP posts. NUPW membership is open to all workers including foreign workers. |
| | 6.6.2 | Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance | YES | There is evidence that meetings held between estate management and main trade unions were recorded and available for sighting and verification during the Surveillance Audit. In July 2018, a meeting was held between the management of Tennamaram Mill and the MAPA-NUPW representatives. This meeting was attended and issue discussed was the new Collective Agreement. Another meeting was held in Oct 2018 attended by the management gave further explanations on the issue of Overtime pay. Interviews with local NUPW representatives also confirmed that they are not restricted from attending NUPW-related meetings. |
| C 6.7 Children are not employed or exploited. | 6.7.1 | There shall be documentary evidence that minimum age requirements are met. Major Compliance | YES | The policy on non-employment of children is contained in the Sime Darby Social Policy dated January 2015. There was no evidence that the estates and the mill employ anyone below the age of 18 years. This was verified by examining the master lists of each operating unit where details of the workers' IC numbers and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed. |
| C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual | 6.8.1 | A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. Major Compliance | YES | The equal opportunities policy is contained within the Sime Darby Social Policy dated January 2015, which states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Social Policy was displayed on notice boards in both Bahasa Malaysia and English. |
| | 6.8.2 | Evidence shall be provided that employees and groups including | YES | Apart from the Social Policy which states that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of |

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|---|------------|--|---------------|---|
| orientation, union membership, political affiliation, or age, is prohibited. | | local communities, women, and migrant workers have not been discriminated against. Major Compliance | | employees. As confirmed by the workers during interviews and field observation, payment of wages/salaries, provision of housing and access to benefits and amenities is fair based on observation, review of pay checks, contracts of employment, and interviews of staff, local and foreign workers. Foreign workers are also accorded the same living standards and accommodations as local workers. |
| | 6.8.3 | It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. Minor Compliance | NO | The recruitment selection of 12 migrant workers by harvesting contractor, was not based on skills, capabilities, qualities and medical fitness. There are no medical records for the migrant workers. Therefore, a Minor NCR RZ 01 2018 was raised. |
| C 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected. | 6.9.1 | A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. Major Compliance | YES | The policy to prevent sexual and other forms of violence is contained in the Sime Darby Social Policy. In addition, awareness on sexual and other forms of harassments are also briefed during muster and Gender Committee meetings held at each Mill and Estates. The Gender Committee Meetings are being held regularly where topics discussed include sexual harassment and violence. Members to lodge complaints if members encounter such incidence. Interviews with female employees confirmed their understanding of what constitutes sexual harassment. |
| | 6.9.2 | A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. Major Compliance | YES | The policy to protect reproductive rights of women is contained in the Sime Darby Plantation Gender Policy. In addition, Gender Committees have been established at the Mill and Estate levels to help disseminate awareness on issues relating to reproductive rights. Awareness on reproductive rights are also briefed during muster and Gender Committee meetings held at each Mill and Estates. Briefing was also given during a gender committee meeting on women's health issues, use of PPE for safety, etc. |
| | 6.9.3 | A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. Minor Compliance | YES | A grievance mechanism which respects anonymity and protects complainants is in place at the CU as per the Sime Darby Gender Committee Handbook 1st Edition 2014. The procedures have been communicated to all levels of workforce. However, the effectiveness of the communication would need to be looked into as some of the workers interviewed were not aware of this mechanism. |
| C 6.10 Growers and millers deal fairly and transparently with smallholders and other local businesses. | 6.10.1 | Current and past prices paid for FFB shall be publicly available. Minor Compliance | YES | As of the date of this Audit, the Tennamaram Palm Oil Mill only receives FFB from its own supply base and has not commenced sourcing FFB from external parties. Therefore, this indicator is not applicable. |
| | 6.10.2 | Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB & inputs shall be document. Major Compliance | YES | As of the date of this Audit, the Tennamaram Palm Oil Mill only receives FFB from its own supply base and has not commenced sourcing FFB from external parties. Therefore, this indicator is not applicable. |

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|--|------------|--|---------------|---|
| | 6.10.3 | Evidence shall be available that all parties understand the contractual agreements they enter into, that contracts are fair, legal and transparent. Minor Compliance | YES | Interviews conducted with contractors and suppliers. Both contractors confirmed the fairness of the terms of their contract, and payments are usually received within 7 to 10 days of invoice issuance. |
| | 6.10.4 | Agreed payments shall be made in a timely manner. Minor Compliance | YES | Both contractors interviewed confirmed that payments are made in a timely manner, namely within 7 to 10 days of invoice. |
| C 6.11 Growers and millers contribute to local Sustainable development where appropriate. | 6.11.1 | Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. Minor Compliance | YES | All the Estates and Mill within SOU 6 Tennamaram contribute to local development by employing workers/staff selected from within the nearby villages and settlements. |
| | 6.11.2 | Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. Minor Compliance | YES | Since there is no scheme smallholders within SOU 6 Tennamaram, this indicator is not applicable. |
| C 6.12 No forms of forced or trafficked labour are used. | 6.12.1 | There shall be evidence that no forms of forced or trafficked labour are used. Major Compliance | YES | Based on interview with workers, field observations, review of the employment contracts, records of wages, overtime payments, there is no evidence of any form of forced or trafficked labour within SOU 6 Tennamaram. In addition, Sime Darby Plantation Sdn Bhd also adopts the Social and Humanity Management Policy dated Jan 2015 which included the commitment to safeguarding operations from employing forced labour. Foreign workers are given the option to either keep their own passports or to handover the passports to Mill/Estates for safekeeping. Those who hand over their passports to the Mill/Estate for safekeeping have signed respective consent letters which were sighted during the audit. Those who voluntarily chose to hand over their passports could access their passports should they need them to travel. |
| | 6.12.2 | Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance | YES | As verified through employment contracts, and interviews with foreign workers, there is no evidence that contract substitution has occurred at the Mill and estates. They were aware of the types of work they would be doing before they arrived in Malaysia. The actual job undertaken was the same as what they were informed of while they were still in their home country. |
| | 6.12.3 | Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance | YES | The SOU 6 Tennamaram adopts the Social Policy dated January 2015 which states that "All employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work and representation race, caste, nationality...". There is also a procedure entitled "Sourcing Process for Foreign Workers". Foreign workers interviewed also confirmed that they underwent an orientation programme at Sua Betong. However, workers who arrived in 2018 were no longer taken to Sua Betong, but instead briefed at the respective estates upon arrival. |
| C 6.13 Growers and | 6.13.1 | A policy to respect human rights shall be documented and | YES | The policy to respect human rights was documented in the Sime Darby Plantation's Social and Humanity Management Policy. This Policy states among others, that it will develop its businesses |

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| Clause | Indicators | | Comply Yes/No | Findings |
|------------------------------|------------|--|---------------|---|
| millers respect human rights | | communicated to all levels of the workforce and operations. Major Compliance | | with a sense of humanity, ensuring that they are socially beneficial and do not infringe basic human rights. This policy was communicated to the workers during muster briefings. |
| | 6.13.2 | As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. Minor Compliance | YES | SOU 6 Tennamaram is located in Peninsular Malaysia and therefore this indicator is not applicable. |

Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

SOU Tennamaram has no plan for any new planting and no new development of area was observed during the visit. Auditors has verified through checking the www.globalforestwatch.com, GOOGLE Maps, Estate Maps and also through site visit to all four estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at SOU Tennamaram. Thus Principle 7 is not applicable.

Principle 8: COMMITMENT TO CONTINUOUS IMPROVEMENT IN KEY AREAS OF ACTIVITY

| Clause | Indicators | | Comply Yes/No | Findings |
|---|------------|--|---------------|--|
| C 8.1 Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations. | 8.1.1 | The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of indicators covered by these Principles and Criteria. As a minimum, these shall include, but are not necessarily be limited to: | | |
| | a) | Reduction in use of pesticides (Criterion 4.6); | | All 3 estates have introduced a mechanized rotor slashing weeding in all young palms possible areas to reduce the use of chemicals for spraying. The estates continued to manage pests, disease and weeds using appropriate IPM techniques. In order to minimize use of insecticides, the estates had established nurseries for beneficial plants mainly <i>Tunera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> . This was to establish continuity in the planting of beneficial plants. |

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| Clause | Indicators | | Comply Yes/No | Findings |
|--------|------------|--|---------------|--|
| | | | | <p>In order to reduce the use of rat baits to control rats, Barn Owls was encouraged as indicated by Barn Owl census records. Until to-date occupancy rate for Barn Owl boxes were also sighted in the fields. The Estates aimed to establish more Barn Owl boxes to ultimately achieve a ratio of 1 box to every 10 Hectares.</p> <p>All 3 estates were committed to reduce using of chemicals and now have implemented and will continue to only spray Circles (Strip) and noxious weeds. Soft weeds and <i>Nephrolepis bisserata</i> were planted, maintained and encouraged in the inter rows. Where possible, harvester's paths were grass cut.</p> <p>The estates in replants with flat areas advocated that chipped palm materials be stacked in Close Ended Conservation Trenches (CECT), which will contain water, in order to minimise/prevent Beetle, the estates used pheromone traps and had programs to cover trunk chips in replants with cover crops. EFB was applied in single layers and is not dumped in large amounts to prevent breeding of Rhinoceros Beetle.</p> <p>To control the Bagworm, the estates have planted more nectariferous beneficial plants. This was evident with the presence of polybag young plants in the nurseries. This actions have reduced the use of chemical.</p> <p>The CU also ensure efficient loose fruit collection and expedite circle raking to avoid VOPs.</p> |
| | b) | Environmental impacts (Criteria 4.3, 5.1 and 5.2); | | <p>Environmental impact assessment, management action plans and continuous improvement plan for Tennamaram SOU has been updated and monitored by management.</p> <p>Among the improvement actions:</p> <p>(a) construction of sump at chemical and workshop to prevent ground or water contamination.</p> <p>(b) collect back chemicals bags and allocate store for control of misused.</p> <p>(c) use of tray for tractor parking and workshop stations to prevent ground contamination</p> |
| | c) | Waste reduction (Criterion 5.3); | | <p>The management of Tennamaram SOU had plan to reduce emission by daily inspection and monitoring for their farm tractor / lorry and genset / water treatment plant to prevent any leakage and problem which can impact on smoke emission.</p> |
| | d) | Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); | | <p>The management of both estates and mill had plan to reduce emission by daily inspection and monitoring for their farm tractor / lorry and gen set / water treatment plant to prevent any leakage and problem which can impact on smoke emission.</p> |
| | e) | Social impacts (Criterion 6.1); | | <p>Action Plan for avoidance or mitigation of negative impacts and promotion of the positive ones are available for each unit. The Action Plan 2017/2018 for Bukit Talang Estate was dated in Nov 2018. Areas of concern/key findings were identified together with the action plan, person in charge and respective completion date. There is evidence that the areas of concern /key findings were developed with the consultation of affected parties. For example, these include complaints from workers on the issue of cows, bad road conditions near the workers' housing, installation of street lights at Kg Baru Division, floods affecting local communities, and rubbish collection by Majlis Daerah Kuala Selangor.</p> |
| | f) | Encourage optimising the yield of the supply base | | <p>SOU Tennamaram being part of a well-established organisation, Sime Darby Plantations Berhad, the yield performance has always been the top priority in ensuring long-term economic and financial viability. In general, various efforts had been done to optimise the yield of the plantation such as</p> |

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| Clause | Indicators | Comply Yes/No | Findings |
|--------|------------------|---------------|--|
| | Major Compliance | | maximising crop recovery, optimum ripeness standard (harvest ripe bunches only and 100% loose fruit collection), the soil fertility were maintained and planting only high yielding planting material. |

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| Clause | Indicators | Comply Yes/No | Findings | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|-----------------------------------|--|----|-------------|---------------|-----------------|---|-------------------|------|------|------------|---|----------------------------|----------------------|------|---|----------------------------|----------|------|---|-----------------------|------------|------|---|--------------------------------|-----------------------------------|------|---|----------------------------------|-------|------|-------|------|-------|------|-------------|------|------------|------|---|-----------------------|-------------|------|----------|------|---|--------------------------|-------------------|------|-----------------------|------|------------------|------|----------|------|
| 4.5.3 Time-bound plan Note: Where there are isolated lapses in implementation of a time-bound plan, a minor non- compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised; | (a) As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat. | YES | <p>Sime Darby Plantation – Indonesian Operations is in progress to certify all 8 new SOUs from 2017 to 2020 as verified through Time Bound Plan as at December 2017 which are:</p> <table> <tr> <th>No</th><th>Name of SOU</th><th>Name of Units</th><th>Time Bound Plan</th></tr> <tr> <td rowspan="2">1</td><td rowspan="2">PT Sime Indo Agro</td><td>East</td><td rowspan="2">2019</td></tr> <tr> <td>Sei Mawang</td></tr> <tr> <td>2</td><td>PT Ladangrumpun Suburabadi</td><td>Subur Abadi Plasma 1</td><td>2019</td></tr> <tr> <td>3</td><td>PT Bersama Sejahtera Sakti</td><td>KKPA BSS</td><td>2019</td></tr> <tr> <td>4</td><td>PT Bahari Gembira Ria</td><td>Plasma BGR</td><td>2020</td></tr> <tr> <td>5</td><td>PT Guthrie Pecconina Indonesia</td><td>Sungai Jernih Estate and GPP KKPA</td><td>2017</td></tr> <tr> <td rowspan="5">6</td><td rowspan="5">PT Mitra Austral Sejahtera (MAS)</td><td>MAS 1</td><td>2019</td></tr> <tr> <td>MAS 2</td><td>2019</td></tr> <tr> <td>MAS 3</td><td>2019</td></tr> <tr> <td>Mas Factory</td><td>2019</td></tr> <tr> <td>Plasma MAS</td><td>2020</td></tr> <tr> <td rowspan="2">7</td><td rowspan="2">PT Sandika Nata Palma</td><td>Karya Palma</td><td>2018</td></tr> <tr> <td>KKPA SNP</td><td>2020</td></tr> <tr> <td rowspan="4">8</td><td rowspan="4">PT Budidaya Agro Lestari</td><td>Pelanjau (PT BAL)</td><td>2018</td></tr> <tr> <td>Sungai Putih (PT BAL)</td><td>2018</td></tr> <tr> <td>Beturus (PT BAL)</td><td>2018</td></tr> <tr> <td>KKPA BAL</td><td>2020</td></tr> </table> | No | Name of SOU | Name of Units | Time Bound Plan | 1 | PT Sime Indo Agro | East | 2019 | Sei Mawang | 2 | PT Ladangrumpun Suburabadi | Subur Abadi Plasma 1 | 2019 | 3 | PT Bersama Sejahtera Sakti | KKPA BSS | 2019 | 4 | PT Bahari Gembira Ria | Plasma BGR | 2020 | 5 | PT Guthrie Pecconina Indonesia | Sungai Jernih Estate and GPP KKPA | 2017 | 6 | PT Mitra Austral Sejahtera (MAS) | MAS 1 | 2019 | MAS 2 | 2019 | MAS 3 | 2019 | Mas Factory | 2019 | Plasma MAS | 2020 | 7 | PT Sandika Nata Palma | Karya Palma | 2018 | KKPA SNP | 2020 | 8 | PT Budidaya Agro Lestari | Pelanjau (PT BAL) | 2018 | Sungai Putih (PT BAL) | 2018 | Beturus (PT BAL) | 2018 | KKPA BAL | 2020 |
| No | Name of SOU | Name of Units | Time Bound Plan | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | PT Sime Indo Agro | East | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Sei Mawang | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | PT Ladangrumpun Suburabadi | Subur Abadi Plasma 1 | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | PT Bersama Sejahtera Sakti | KKPA BSS | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | PT Bahari Gembira Ria | Plasma BGR | 2020 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | PT Guthrie Pecconina Indonesia | Sungai Jernih Estate and GPP KKPA | 2017 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | PT Mitra Austral Sejahtera (MAS) | MAS 1 | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | MAS 2 | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | MAS 3 | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Mas Factory | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Plasma MAS | 2020 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | PT Sandika Nata Palma | Karya Palma | 2018 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | KKPA SNP | 2020 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | PT Budidaya Agro Lestari | Pelanjau (PT BAL) | 2018 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Sungai Putih (PT BAL) | 2018 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Beturus (PT BAL) | 2018 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | KKPA BAL | 2020 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | (b) | Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness; | YES | The time bound plan set for 8 new/uncertified SOUs was appropriate and within the timeframe of three years for RSPO certification. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--------------------------------|---|--|--|----|-------------|---------------|--|---|-------------------|-----------------------|--------------------------------------|---|----------------------------|----------------------------|---|---|----------------------------|----------|--|---|-----------------------|---------------|--|---|--------------------------------|--|---|---|----------------------------|-------------------------|--|
| | (c) | Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent); | YES | CB has received and verified time bound plan for 8 new/uncertified SOUs as at December 2017. The time bound plan was revised and endorsed by the Head of PSQM, Sime Darby Plantation Sdn Bhd - Indonesia. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.4 Requirements for uncertified management units: | (a) | No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB; | YES | <div>The status of 8 uncertified SOUs through Mutuagung Assessment Report were as follows:</div> <table><tr><th>No</th><th>Name of SOU</th><th>Name of Units</th><th>Replacement of primary forest or HCV area and new planting</th></tr><tr><td>1</td><td>PT Sime Indo Agro</td><td>East Sei Mawang</td><td>No new planting since November 2005.</td></tr><tr><td>2</td><td>PT Ladangrumpun Suburabadi</td><td>Subur Abadi Plasma 1</td><td>Smallholder project – SAP 1 is targeted for certification by 2019</td></tr><tr><td>3</td><td>PT Bersama Sejahtera Sakti</td><td>KKPA BSS</td><td>New smallholder project - KKPA Maju Bersama targeted for Certification by 2019</td></tr><tr><td>4</td><td>PT Bahari Gembira Ria</td><td>Plasma BGR</td><td>Smallholder Project – socialization is on going with the Koperasi Unit Desa (KUD).</td></tr><tr><td>5</td><td>PT Guthrie Pecconina Indonesia</td><td>Sungai Jernih Estate and GPP KKPA</td><td>The Certificate Holder has sent Liability Disclosure and LUCA for PT GPI and GPP KKPA to RSPO Compensation.</td></tr><tr><td>6</td><td>PT Mitra Austral Sejahtera</td><td>MAS 1 MAS 2 MAS 3</td><td>HCV assessment was conducted in March 2009. A disclosure of liability including LUCA analysis sent to RSPO Secretariat on 24 June 2016 and expected to</td></tr></table> | No | Name of SOU | Name of Units | Replacement of primary forest or HCV area and new planting | 1 | PT Sime Indo Agro | East Sei Mawang | No new planting since November 2005. | 2 | PT Ladangrumpun Suburabadi | Subur Abadi Plasma 1 | Smallholder project – SAP 1 is targeted for certification by 2019 | 3 | PT Bersama Sejahtera Sakti | KKPA BSS | New smallholder project - KKPA Maju Bersama targeted for Certification by 2019 | 4 | PT Bahari Gembira Ria | Plasma BGR | Smallholder Project – socialization is on going with the Koperasi Unit Desa (KUD). | 5 | PT Guthrie Pecconina Indonesia | Sungai Jernih Estate and GPP KKPA | The Certificate Holder has sent Liability Disclosure and LUCA for PT GPI and GPP KKPA to RSPO Compensation. | 6 | PT Mitra Austral Sejahtera | MAS 1 MAS 2 MAS 3 | HCV assessment was conducted in March 2009. A disclosure of liability including LUCA analysis sent to RSPO Secretariat on 24 June 2016 and expected to |
| No | Name of SOU | Name of Units | Replacement of primary forest or HCV area and new planting | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | PT Sime Indo Agro | East Sei Mawang | No new planting since November 2005. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | PT Ladangrumpun Suburabadi | Subur Abadi Plasma 1 | Smallholder project – SAP 1 is targeted for certification by 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | PT Bersama Sejahtera Sakti | KKPA BSS | New smallholder project - KKPA Maju Bersama targeted for Certification by 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | PT Bahari Gembira Ria | Plasma BGR | Smallholder Project – socialization is on going with the Koperasi Unit Desa (KUD). | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | PT Guthrie Pecconina Indonesia | Sungai Jernih Estate and GPP KKPA | The Certificate Holder has sent Liability Disclosure and LUCA for PT GPI and GPP KKPA to RSPO Compensation. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | PT Mitra Austral Sejahtera | MAS 1 MAS 2 MAS 3 | HCV assessment was conducted in March 2009. A disclosure of liability including LUCA analysis sent to RSPO Secretariat on 24 June 2016 and expected to | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | | | | (MAS) | Mas Factory | submit final LUCA to RSPO Secretariat office by end Dec 2017. | |
| | | | | | | Plasma MAS | | |
| | | | | 7 | PT Sandika Nata Palma | Karya Palma KKPA SNP | There was a new planting area in the estate. Need to submit NPP. | |
| | | | | 8 | PT Budidaya Agro Lestari | Pelanjau (PT BAL) Sungai Putih (PT BAL) | No new planting activities. | |
| | | | | | | Baturus (PT BAL) | There was a new planting area in the estate. Need to submit NPP. | |
| | | | | | | KKPA BAL | No new planting activities. | |
| | (b) | Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6; | YES | The status of 8 uncertified SOUs through Mutuagung Assessment Report were as follows: | | | | |
| | | | | No | Name of SOU | Name of Units | Land conflicts | |
| | | | | 1 | PT Sime Indo Agro | East Sei Mawang | East Estate does not have existing land conflicts with the community, the land issue is currently under the process of legality under the purview of the Ministry of Forestry, Indonesia. | |
| | | | | 2 | PT Ladangrumpun Suburabadi | Subur Abadi Plasma 1 | Smallholder project – SAP 1. No land conflict. | |
| | | | | 3 | PT Bersama Sejahtera Sakti | KKPA BSS | New smallholder project - KKPA Maju Bersama. No land conflict. | |
| | | | | 4 | PT Bahari Gembira Ria | Plasma BGR | Smallholder Project. No land conflict. | |
| | | | | 5 | PT Guthrie Pecconina Indonesia | Sungai Jernih Estate and GPP KKPA | Still in process to get certificate of land use right. Head of Musi Banyuasin District concerning the Granting of Plantation Business License of PT Guthrie dated 25 Feb 2010. | |
| | | | | 6 | PT Mitra Austral Sejahtera (MAS) | MAS 1 MAS 2 MAS 3 Mas Factory Plasma MAS | There are land conflict. Sime Darby Plantation is submitting quarterly progress report to RSPO. The latest report was submitted on 18 Dec 2017. The details of the case is available on RSPO Website https://www.rspo.org/members/complaints/status-of-complaints/view/29 | |
| | | | | 7 | PT Sandika Nata Palma | Karya Palma KKPA SNP | No land conflict. | |
| | | | | 8 | PT Budidaya Agro Lestari | Pelanjau (PT BAL) Sungai Putih (PT BAL) | No land conflict. | |

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| | | | | | Beturus (PT BAL) | |
| | | | | | KKPA BAL | |
| (c) | Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3; | YES | Based on the internal audit report, there were no labour dispute that are not being resolved through an agreed process for all uncertified units for all 8 uncertified units of Sime Darby Plantation Sdn Bhd - Indonesia as at December 2017. | | | |
| (d) | Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1; | YES | There was legal non-compliance on land title for 5 uncertified SOUs as listed below. These PTs waiting for land title process ; PT Sime Indo Agro 1,652 Ha, PT Bersama Sejahtera Sakti 765 Ha, PT Bahari Gembira Ria 1,639 Ha, PT Guthrie Pecconina Indonesia 4,133 Ha and PT Budidaya Agro Lestari. PT Mitra Austral Sejahtera was in progress to close non-compliances in relation to legal requirements as raised during Internal Audit Nov 2017. | | | |
| (e) | The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 4.5.4 (a) – (d) above by the audit team based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach: <ul style="list-style-type: none">A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; | YES | | | | |
| | | | The status of 8 uncertified SOUs through Mutuagung Assessment Report were as follows: | | | |
| | | | No | Name of SOU | Name of Units | Positive assurance statement and self-assessment |
| | | | 1 | PT Sime Indo Agro | East Sei Mawang | Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor |
| | | | 2 | PT Ladangrumpun Suburabadi | Subur Abadi Plasma 1 | Internal assessment has been conducted for Subur Abadi Plasma 1 on 22 Feb 2017. The Subur Abadi Plasma 1 Scheme is currently undergoing RSPO Certification under PT Ladangrumpun Suburabadi pending certification. RSPO Pre-assessment has been completed on 20-24 March 2017. The contract between the Certification Body (PT Mutuagung Lestari) and PT Ladangrumpun Suburabadi is available (dated 6 March 2017) which includes the scope of the supply base of Subur Abadi Plasma stated under Clause 2, 1a. There is no outstanding land and social conflicts on the ground. HCV Assessment for Subur Abadi Plasma smallholders have been conducted (by Pollito) in July 2011 before commencement of any new planting. Land Use Change Analysis for the Plasma is in progress. |
| 3 | PT Bersama Sejahtera Sakti | KKPA BSS | New smallholder project currently under preparation to undergo RSPO Certification by 2019, internal audit for PT BSS has been undertaken, the latest internal audit | | | |

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| | | | has been conducted on 21 April 2018. |
| | | | There is no outstanding social and land conflicts on the ground. The plasma scheme has already undergone HCV Assessment (conducted by Pollito) in July 2011 before commencement of New Planting. Land Use Change Analysis is in progress. |
| 4 | PT Bahari Gembira Ria | Plasma BGR | Confirmation of the status is in progress. Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2F%2FRSPOCertSearch&file=00P9000001OioYJEAZ https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2F%2FRSPOCertSearch&file=00P9000001OioXOEAZ |
| 5 | PT Guthrie Pecconina Indonesia | Sungai Jernih Estate and GPI KKPA | Sungai Jernih Estate and GPI KKPA were audited by Mutuagung as verified through Recertification Audit report. The assessment was conducted on 15 – 20 May 2017. |
| 6 | PT Mitra Austral Sejahtera (MAS) | MAS 1 MAS 2 MAS 3 Mas Factory Plasma MAS | Internal assessment was conducted on 9 - 10 Nov 2017 by PSQM Indonesia. |
| 7 | PT Sandika Nata Palma | Karya Palma KKPA SNP | Internal assessment was conducted on 10 Feb 2017. |
| 8 | PT Budidaya Agro Lestari | Pelanjau (PT BAL) Sungai Putih (PT BAL) Beturus (PT BAL) KKPA BAL | Internal assessment was conducted on 18 - 23 Sept 2016. This PT also has conducted Stage 1 audit on RSPO Certification System, P&C RSPO (2016) and RSPO Supply Chain Certification Standard on 17 – 22 April 2017. |
| | | | Smallholder project – targeted for certification by 2020. |
| | <ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. | YES | Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report. |

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| | | <ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints | YES | Verified through RSPO website: https://www.rspo.org/members/status-of-complaints/ |
| | | <ul style="list-style-type: none"> If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. | YES | Mutuagung Lestari had conducted the consultation with relevant NGO's and field inspection as verified by audit team through the Mutuagung Assessment Report. |
| <p>4.6.4</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> | | No additional indicators | YES | As mentioned in 2.2.1 of this checklist it was evident that the legal ownership of the estates land i.e. Tennamaram, Sungei Buloh and Bukit Talang estates were previously owned by Kumpulan Guthrie Berhad and Golden Hope. It was then transferred to Sime Darby after the merger in 2007. Kumpulan Guthrie Berhad and Golden Hope has bought the land from Selangor State government since July 1924. Each estate had legal use of the land through an Ownership signed by the Lands and Surveys of Kuala Selangor following the payment of premium and Land fee. With these information and based on interviews and this audit finding, it has been confirmed that there was no such case concerning the rights of local communities and indigenous peoples at SOU Tennamaram. |
| <p>Note:</p> <p>1. For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&C. For example, if an NC against a major indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless that is actively addressed;</p> <p>2. Failure to address any outstanding NC within uncertified unit(s) regarding 4.5.4 (a)-(d) may lead to certificate suspension(s) to the certified unit(s), in accordance with the provisions of these Certification Systems.</p> | | | | |

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Attachment 4

Details of Non-conformities and Corrective Actions Taken

| P & C Indicator | Specification Major/Minor | Detail Non-conformances | Corrective Action | Verification by Assessor |
|--------------------|---------------------------|---|---|---|
| 2.1.1 RZ05 2018 | Major (Recurrence) | <p>Findings:</p> <p>1. Tennamaram Estate does not comply with relevant legal requirements under the Immigration Act 1959/63 and the Immigration Regulations 1963.</p> <p>2. Bukit Talang Estate does not comply with the relevant legal requirements under Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000.</p> <p>Objective evidence:</p> <p>1) a. 12 migrant workers who do not have valid permit were hired by harvesting contractor, Puspavalle Enterprise, to work at Hopeful Division, Tennamaram Estate. This contravenes Section 55B Immigration Act 1959/63.</p> <p>b. 12 migrant workers who do not have valid permit were found living at the Hopeful Division workers' quarters. This contravenes Section 56 (1) (d) Immigration Act 1959/63.</p> <p>c. 1 migrant worker hired by harvesting contractor, Puspavalle Enterprise, to work as harvester at Hopeful Division, Tennamaram Estate has a Visit Pass for the Construction Sector. Working in an oil palm plantation is contrary to the conditions of issuance of his Visit Pass (Temporary Employment). This contravenes Rule 39(b) Immigration Regulations 1963.</p> <p>2. 1 worker was found on 15 November 2018 carrying out P&D spraying at the oil palm nursery, Bukit Talang Estate after a medical practitioner had certified that he was unfit for spraying via report dated 8 November 2018. This contravenes Section</p> | <p>Correction :</p> <p>- Termination letter issues to Puspavalle Enterprise by Tennamaram Estate for Breaching its contract with the company. Termination of Puspavalle Enterprise fork work engaged for the entire Selangor Region is also executed.</p> <p>- Management and Person in Charge of Medical Surveillance must vet through all the reports submitted by Occupational Health Doctor (OHD).</p> <p>Corrective Action:</p> <p>- A Standard Operating Procedure (SOP) will be developed by HQ to ensure monitoring mechanism of contractor's workers is in place.</p> <p>- A letter dated 26/11/2018 has been issued to Klinik Ng and Singh expressing SDP Disappointment and informing the discontinuation of service with the said clinic.</p> | <p>- Auditor has verified the termination letter of contractor dated 16/11/18. New SOP developed named 'Contractor Workers Management' dated 24/11/18 and also checklist of monitoring the contractor at estate.</p> <p>- Auditor has received and verified the reminder letter issued to PIC of Bukit Talang Estate dated 16/11/18. The letter of apology, dated 17/11/18 from Klinik NG was also sighted where they have acknowledged the wrong reporting and the second opinion issued by Klinik Tasik Putri on 17/11/18 stated that all sprayers were indeed healthy.</p> <p>Status: After the verification of the corrective actions by the CU, the finding was closed and the suspension lifted. The effectiveness of the action will be further verified in next audit.</p> |

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| | | 28(1) Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous To Health) Regulations. | | |
| Module D Identity Preserved Indicator: D.4.2 MZK 01 2018 | Major | <p>Finding : There was overproduction of certified tonnage.</p> <p>Objective evidence : Sighted that overproduction Projected PK IP for period Dec 2017 – Nov 2018 which is projected 12,635.20 mt and actual 12,772.06 mt and Tennamaram POM yet to inform the CB and apply extension to the RSPO.</p> | <p>Correction To revise/ complete SOP of CPO/PK Product Traceability, by adding the requirement about the obligation to report overproduction of certified tonnage. Management of Tennamaram already apply extension of volume to the CB on date 13/11/18</p> <p>Corrective Action To Management Representative will monitor the implementation of SOP through Internal Audit. Management already amended the SOP regarding Over production.</p> | <p>- Auditor has received the application of PK volume extension has been approved by RSPO on dated 29/11/18 and verified SOP name SOP for Sustainable Supply Chain and Traceability dated Sept 2018 amended on clause 15 Production Volume no 15.3</p> <p>Status: Closed The implementation of corrective action will be verified by next audit.</p> |
| 2.1.3 RAR 01 2018 | Minor | <p>Finding: To ensuring compliance on industry code of practices for safe working in confined space 2010 was not implemented.</p> <p>Objective evidence: At Tennamaram POM, contractor workers who conduct maintenance service at confined space area on 08-09/10/2018 and 27-28/06/2018 don't have health certificate fitness as per stated in industry code of practices for safe working in confined space 2010.</p> | <p>Correction To ensure that contractor's worker is sent for health certificate fitness for working in confined space.</p> <p>Corrective Action A Standard Operating Procedure (SOP) will be developed by HQ to ensure monitoring mechanism of contractor's workers is in place currently the SOP has been discussed in the HQ and will be Distributed to SOU when Complete.</p> <p>Target to Complete in : July 2019</p> | <p>Corrective action Plan accepted. The implementation of corrective action plan will be verified by next audit.</p> <p>Status: Open.</p> |
| 4.1.2 RZ04 2018 | Minor | <p>Finding: 1. There is no consistent implementation of Sime Darby Berhad's Human Rights Charter and Vendor Code of Business Conduct (COBC).</p> <p>2. There is no mechanism to check the consistent implementation of contractual obligations with a Vendor.</p> <p>3. Water table monitoring of Section 10 of the</p> | <p>Correction 1. Termination letter will be issued to Puspavalle Enterprise for breaching its contract with the company 2. To conduct training on water table monitoring to personnel involved</p> <p>Corrective Action 1. A Standard Operating Procedure (SOP) will be developed by HQ to ensure</p> | <p>Corrective action Plan accepted. The implementation of corrective action plan will be verified by next audit.</p> <p>Status: Open.</p> |

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| | | <p>Agriculture Reference Manual on water table in coastal estates or peat areas was not complied with.</p> <p>Objective evidence:</p> <p>1. The hiring of 12 workers who do not possess Valid Pass under Section 55B Immigration Act 1959/63 at Hopeful Division, Tennamaram Estate by harvesting contractor, Puspavalle Enterprise contravenes the pledge to eradicate all forms of exploitation elucidated in Sime Darby Berhad's Human Rights Charter and Vendor COBC.</p> <p>2. The hiring of 12 workers who do not possess Valid Pass under Section 55B Immigration Act 1959/63 at Hopeful Division, Tennamaram Estate by harvesting contractor, Puspavalle Enterprise breaches paragraph (e) of the Terms and Conditions on Purchase Order signed between Tennamaram Estate and Puspavalle Enterprise (Contract Form No 4300438025) dated 1 October 2018.</p> <p>3. On Sg Buloh Estate, being a coastal estate, there is no evidence that water table monitoring is being carried out.</p> | <p>monitoring mechanism of contractor's workers is in place (To address Objective Evidence 1 & 2)</p> <p>2. To ensure that monitoring logbook/ sheet is verified by Assistant Manager on a monthly basis</p> | |
| 4.1.3 RZ03 2018 | Minor | <p>Finding : No records of action taken on the recurring issues identified in weekly housing inspection reports since 12 November 2016.</p> <p>Objective evidence : Chemical containers at Sg Buloh Estate (Kuala Selangor Division linesite) has been a recurring issue identified in the weekly housing inspection reports since 12 November 2016 until 10 November 2018. There is no evidence that any remedial action has been taken.</p> | <p>Manager to send out a memo to remind person in charge to include housing area findings in their periodical meetings and to perform remedial action, if necessary</p> | <p>Corrective action Plan accepted. The implementation of corrective action plan will be verified by next audit.</p> <p>Status: Open.</p> |
| 6.1.4 RZ02 2018 | Minor | <p>Finding :</p> <p>1. Impacts of replanting at Sg Buloh Estate and Bukit Talang Estate were not taken into account when reviewing the Social Impact Assessment Plans.</p> <p>2. Social Management Plan dated 1 Nov 2018 at Sg Buloh Estate has not taken into account social issues raised by stakeholders.</p> | <p>1. HQ to perform Social Impact Assessment (SIA) to stakeholders affected by replanting activity at Sg Buloh Estate & Bukit Talang Estate</p> <p>2. HQ to conduct refresher training to guide SOU 6 Tennamaram to update their Social Action Plan effectively</p> | <p>Corrective action Plan accepted. The implementation of corrective action plan will be verified by next audit.</p> <p>Status: Open</p> |

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| | | Objective evidence: 1. The Social Impact Assessment Action Plans carried out by Sg Buloh Estate and Bukit Talang Estate did not take into account the impacts of ongoing replanting activities on affected parties. 2. The Social Management Plan of Sg Buloh Estate dated 1 Nov 2018 did not take into consideration social issues raised in Gender Committee meetings dated 8 Oct 2018 and 16 March 2018 relating to PPE and work tools for workers, requests for vehicle for medical appointments at Klinik Kesihatan Kuala Selangor, and for installation of lights in dark areas. | Plan to Complete in March 2019 | |
| 6.8.3 RZ01 2018 | Minor | Finding: The recruitment selection of 12 migrant workers by harvesting contractor, Puspavalle Enterprise, to work at Hopeful Division, Tennamaram Estate was not based on skills, capabilities, qualities and medical fitness. Objective evidence: 1. 5 migrant workers hired via Puspavalle Enterprise to work at Hopeful Division, Tennamaram Estate as pruners were previously working as follows: a. 2 were restaurant workers; b. 1 was a bricklayer; c. 1 was a paint factory worker; and d. 1 was a construction worker. 2. There are no medical records for 12 migrant workers (5 pruners and 7 harvesters) hired via Puspavalle Enterprise to work at Hopeful Division, Tennamaram Estate. | Corrective Action Plan A Standard Operating Procedure (SOP) will be developed by HQ to ensure monitoring mechanism of contractor's workers is in place currently the SOP has been discussed in the HQ and will be Distributed to SOU when Complete. Target to Complete in : July 2019 Management Tennamaram Estate will ensure that contractor has to carry out training and medical examination for all their workers to ensure that they are fit to work. A set of medical report copy shall be handed over to the estate management as the evidence of the worker's fitness. This is an action that will be taken by the contractor's immediately. | Corrective action Plan accepted. The implementation of corrective action plan will be verified by next audit. Status: Open |

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Attachment 5

RSPO SUPPLY CHAIN : AUDIT CHECKLIST

SECTION A : GENERAL INFORMATION

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| 1. File Reference No. | : ES10171011 |
| 2. Name of facility/ site(s) /entity(ies) | : Sime Darby Plantations Berhad – SOU Tennamaram |
| 3. Site Location (single site/multisite/Group) | : 45600 Bestari Jaya, Selangor Darul Ehsan, Malaysia |
| 4. SC model | : Identity Preserved |
| 5. Type of entity | : Mill / Crusher / Refinery / Biodiesel plant / Primary Oleochemical / Secondary Oleochemical / End product manufacturer <i>For oleochemicals and its derivatives, please check the conversion factor against the “RSPO Rules for Oleochemicals and its Derivatives” dated 1st December 2016</i> |
| 6. RSPO Member Number | : 1-0008-04-000-00 |
| 7. Annual summary records of certified oil palm products purchased and claimed | : Projected for last year for period of Dec 17 until Nov 18 CPO Projected: 48,243.48 PK Projected: 12,635.20 CPO Sell: 46,760.13 CPO Claim as Identity Preserved: 42,017.46 CPO Claim as Non-RSPO: 4,742.67 PK Sell: 12,772.06 PK Claim as Identity Preserved: 11,014.92 PK Claim as Non-RSPO: 1,757.14 |

SECTION B (i): RSPO SUPPLY CHAIN CERTIFICATION SYSTEM (REVISED JUNE 2017)

| | Requirements | Remarks |
|--------|--|---|
| | Audit Process Requirements – FOR STAGE 2 / RECERTIFICATION AUDIT | |
| 5.3.8 | The certification audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization seeking or holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard. | N/A as this audit is a surveillance audit. |
| | Audit Process Requirements – SURVEILLANCE AUDIT | |
| 5.3.26 | The surveillance audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization holding certification, are sufficient and adequately implemented to meet the | Tennamaram POM had revised their documented procedure title ‘ <i>Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001</i> ’, version 2, Issue 4 dated Sept 2018 The procedure described the following: a) Clause 4.0 ~ the responsibility of for the implementation of RSPO SCC i.e. head |

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| | <p>intent and requirements of the RSPO Supply Chain Certification Standard.</p> <p>In cases where an organization seeking certification outsources activities to independent third parties, a risk assessment shall be done by the CB to determine whether an audit of the sub-contractor is required. If the outsourced contractor holds RSPO Supply Chain certification, then it does not require an additional audit.</p> | <p>of operating unit</p> <ul style="list-style-type: none"> b) Clause 5.0 ~ Control of document & records such as weighbridge tickets, consignment note , training record & contracts. Record retention for 10 years. Define the critical control point (CCP) :estate – weighbridge, mill – weighbridge, admin office, ramp, CPO despatch area, CPO storage tank. Kernel silos. c) Clause 6.0 ~ Delivery of FFB from the estate – relevant record involved, flowchart for crop diversion, list of mill and their supply chain model i.e. IP or MB d) Clause 7.0 ~ Receiving FFB at the mill – list of supply base, rules for determining diverted FFB destination, relevant record e) Clause 8.0 ~ process monitoring – for IP model mill need to ensure no mixing of RSPO certified and non-certified f) Clause 9.0 ~ CPO and PK despatch – [Clause 9.1] all delivery of CPO and PK shall be in accordance with the contract allocated by Global Trading & Marketing (GTM) department. [Clause 9.2] Outgoing document for CPO and PK 9e.g. contract, weighbridge ticket / despatch note) shall specify the following information which can be either presented in single document or across a range of document Trade name / RSPO IP, RSPO certificate no. : RSPO 0025, g) Clause 10.0 ~ Non-conforming material / product – requirement to downgrade the RSPO Product h) Clause 11.0 ~ product claim – shall follow RSPO rules on market communication & claim i) Clause 12.0 ~ Outsourced contractor - the mill has established list of outsourced contractor. Sighted list of transporter for CPO and PK. j) Clause 13.0 ~ Training – the mill shall provide training for relevant personnel carrying the task at tech critical control point (CCP). k) Clause 14.0 ~ Reclassification of mill's supply chain model - Reclassification of mill's supply chain model may be determined by GTM/ PSQM. CB shall be notified. All communicated shall be recorded. l) Clause 15.0 ~ Production volume m) Clause 16.0 ~ Conversion Factors n) Clause 17.0 ~ Internal Audit o) Clause 18.0 ~ Complaints p) Clause 19.0 ~ Management Review <p>The procedure was kept in file RSPO Supply Chain Manual (SCM/RSPO/SD) Appropriate changes were also made in the change to include the new clause Production volume, Conversion factors, Internal Audit, Complaints and Management Review.</p> |
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SECTION B (ii): GENERAL CHAIN OF CUSTODY REQUIREMENTS FOR THE SUPPLY CHAIN

| | Requirements | Remarks |
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| 1 | Applicability of the general chain of custody requirements for the supply chain | |
| 1.1 | Organization takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. | Tennamaram POM has legal ownership and physically handles RSPO certified sustainable crude palm oil and palm kernel. |
| 1.2 | Traders and distributors require a license obtained from RSPO to sell RSPO certified product but do not themselves require certification. When selling RSPO certified product a licensed trader and/or distributor must pass on the certification number of the product manufacturer and the applicable supply chain model. | Not applicable due to Tennamaram POM is processing facility. |
| 1.3 | Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform. | RSPO Palm Trace details are as followed; Member name: Tennamaram Oil Mill. |
| 1.4 | Processing aids do not need to be included within an organization's scope of certification. | No processing aid involved in Tennamaram POM scope of certification |
| 2 | Supply chain model | |
| 2.1 | The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance. | Tennamaram POM had demonstrated the correct use of supply chain model; They continue to apply the IP model and their suppliers are of own supply base namely Tennamaram Estate, Bukit Talang Estate and Sungei Buloh Estate. |
| 2.2 | The site can use one (1) or a combination of supply chain models as audited and certified by the CB. | Tennamaram POM decided to maintain the IP model for their supply chain system. Therefore, they are being audited against the general chain of custody requirement for the supply chain as well as Module D of the RSPO Supply Chain Standard. |
| 3 | Documented procedures | |
| 3.1 | The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: | <p>Tennamaram POM had revised their documented procedure title '<i>Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001</i>', version 2, Issue 4 dated Sept 2018. The procedure described the following:</p> <ul style="list-style-type: none"> a) Clause 4.0 ~ the responsibility of for the implementation of RSPO SCC i.e. head of operating unit b) Clause 5.0 ~ Control of document & records such as weighbridge tickets, consignment note, training record & contracts. Record retention for 10 years. Define the critical control point (CCP) :estate – weighbridge, mill – weighbridge, admin office, ramp, CPO despatch area, CPO storage tank. Kernel silos. c) Clause 6.0 ~ Delivery of FFB from the estate – relevant record involved, flowchart for crop diversion, list of mill and their supply chain model i.e. IP or MB d) Clause 7.0 ~ Receiving FFB at the mill – list of supply base, rules for determining diverted FFB destination, relevant record e) Clause 8.0 ~ process monitoring – for IP model mill need to ensure no mixing |

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| | | <p>of RSPO certified and non-certified</p> <p>f) Clause 9.0 ~ CPO and PK despatch – [Clause 9.1] all delivery of CPO and PK shall be in accordance with the contract allocated by Global Trading & Marketing (GTM) department. [Clause 9.2] Outgoing document for CPO and PK 9e.g. contract, weighbridge ticket / despatch note) shall specify the following information which can be either presented in single document or across a range of document Trade name / RSPO IP,</p> <p>g) Clause 10.0 ~ Non-conforming material / product – requirement to downgrade the RSPO Product</p> <p>h) Clause 11.0 ~ product claim – shall follow RSPO rules on market communication & claim</p> <p>i) Clause 12.0 ~ Outsourced contractor - the mill has established list of outsourced contractor. Sighted list of transporter for CPO and PK.</p> <p>j) Clause 13.0 ~ Training – the mill shall provide training for relevant personnel carrying the task at tech critical control point (CCP).</p> <p>k) Clause 14.0 ~ Reclassification of mill's supply chain model - Reclassification of mill's supply chain model may be determined by GTM/ PSQM. CB shall be notified. All communicated shall be recorded.</p> <p>l) Clause 15.0 ~ Production volume</p> <p>m) Clause 16.0 ~ Conversion Factors</p> <p>n) Clause 17.0 ~ Internal Audit</p> <p>o) Clause 18.0 ~ Complaints</p> <p>p) Clause 19.0 ~ Management Review</p> <p>The procedure was kept in file RSPO Supply Chain Manual Appropriate changes were also made in the change to include the new clause Production volume, Conversion factors, Internal Audit, Complaints and Management Review.</p> |
| a) | Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. | Supply chain procedure was revised September 2018 (revision: 4) The Procedure was sighted and found all elements of the RSPO Supply Chain standard were covered. |
| b) | Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). | Sighted CPO and PK production record, weighbridge report, dispatch record and training record was up to date and well maintained. |
| 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 organization's procedures for the implementation of this standard. | The Senior Assistant Manager have overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Tennamaram POM. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements. |
| 3.2 | <p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>ii. Effectively implements and maintains the standard requirements</p> | RSPO internal audit was conducted in July 2018 by PSQM. The internal audit has follow the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 2 Major and 1 nonconformance report (NCR) and 13 OFI were raised by auditor. All NCR and OFI has been closed, and the auditor has found that all of the corrective action has successfully address by the POM. Audit Attendance sheet, audit plan, audit notes, was |

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| | <p>within its organization.</p> <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 organization shall be able to maintain the internal audit records and reports.</p> | sighted by auditor. |
| 4 | Purchasing and goods in | |
| 4.1 | <p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number. <p>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.</p> | <p>Tennamaram POM obtained certified FFB from own certified supply base Tennamaram Estate, Bukit Talang Estate and Sungei Buloh Estate.</p> <p>Sighted FFB consignment note for Tennamaram Estate, Bukit Talang Estate and Sungei Buloh Estate from 1 May 2017 till 25 October 2018. Among the information available on the FFB consignment note are estate name, vehicle no, field name, delivery date, no of FFB bunches, FFB weight.</p> <p>Since last audit, TPOM had received/ processed 228, 925.33mt of FFB.</p> |
| a) | The site shall have documentation that demonstrate that purchases are made to the material category agreed with their supplier (IP, SG or MB). | TPOM had continued to receive certified FFBs from the CU's own supply bases as well as non-certified FFBs from outsiders. There were 3 supply bases (estates) sending certified FFBs to TPOM. They were Tennamaram Estate, Bukit Talang Estate and Sungei Buloh Estate. Sighted FFB consignment note for Tennamaram Estate, Bukit Talang Estate and Sungei Buloh Estate. |
| b) | The site ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcement and Shipping Confirmation on the RSPO IT platform on the level of each shipment. | For certified CPO & PK produced, Tennamaram POM update their stock in Palm Trace Tennamaram POM has registered in IT platform. |
| c) | A check of the validity of the Supply Chain Certification of suppliers for all sites that are SC certified. This shall be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcement | TPOM had continued to receive certified FFBs from the CU's own supply bases as well as non-certified FFBs from outsiders. There were 3 supply bases (estates) sending certified FFBs to TPOM. They were Tennamaram Estate, Bukit Talang Estate and Sungei Buloh Estate. Internal supplier under same certification – valid certificate. |
| 4.2 | The site shall have a mechanism in place for handling non- | TPOM had started implementing the electronic system 'Simeweigh' to trace the volume |

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| | conforming material and/or documents. | of in-coming FFBs from the certified supply bases (estates). Every lorry load of certified FFBs leaving the certified estate was accompanied by a 'card'. On arrival at TPOM, the lorry driver surrendered the 'card' to the Weighbridge Clerk. The 'card' was then scanned and the relevant information on the certified FFBs was then captured and stored in a data base. On processing, TPOM still referred to the sales contract issued by the Headquarters office for production planning (Refer 8.0 of the SOP – Process Monitoring). No NCP/ NCD recorded since last audit. |
| 5 | Outsourcing activities | |
| 5.1 | In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. <i>This requirement should not apply to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the organization (not the tank farm manager).</i> | There are 1 outsource company CPO transporter. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training was sighted. For PK transporting refinery sending their own transport to pick up PK at POM. |
| 5.2 | Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a) The site has legal ownership of all input material to be included in outsourced processes; b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The responsibility is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The site seeking or holding certification 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 any and all information, when this is announced in advance. | a) 1 outsource company CPO transporter. b) There is contract document between Tennamaram POM and the transporters. c) The RSPO Supply Chain procedure has described on outsource activity. d) Inspection was carried out as additional effort to ensure no contamination sighted book at AP Post. |
| 5.3 | The site shall record the names and contact details of all contractors used for the processing or production of RSPO certified materials. | List of contact person for both transporters were made available and up-to-date. |
| 5.4 | The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or production of RSPO certified materials. | No new contractors used for the processing or production of RSPO certified materials. |

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| 6 | Sales and goods out | |
| 6.1 | <p>The organization shall ensure that the following minimum information for RSPO certified products is made available in document form. Information must 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"> • The name and address of the buyer; • The name and address of the seller; • The loading or delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number; • A unique identification number. | <p>The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Sime Darby Plantations Berhad and Global Trade Marketing Department (HQ) on behalf of Tennamaram POM.</p> |
| 7 | Registration of transactions | |
| 7.1 | <p>Supply chain actors who:</p> <ul style="list-style-type: none"> • are supply chain actors between the mill and final refinery; • take legal ownership and physically handle RSPO Certified Sustainable oil palm products; and • are part of the supply chain of RSPO Certified Sustainable oil palm products <p>must register their transaction in the RSPO IT platform at the time of physical shipment as required by the rules set by RSPO.</p> | <p>Global Trading and Marketing Sime Darby at HQ Ara Damansara are the incharge update the RSPO IT Platform based on input provided by Tennamaram POM. The registration of transaction being carried out by Global Trade Marketing subordinate. Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).</p> |
| 8 | Training | |
| 8.1 | <p>The organization shall have a defined training plan, which is subject to on-going review and is supported by records of the training provided to staff.</p> | <p>Training plan has included the RSPO Supply chain training scheduled in March 2019 for all staff, Executive & workers.</p> |
| 8.2 | <p>Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification system.</p> <p>Training shall be specific and relevant to the task(s) performed.</p> | <p>Training was conducted for workers in June 2018 by attended by SCCS PIC, Clerk, Assistant Engineer, Staff, Weighbridge Operator and Attendance list & photograph was seen.</p> |
| 9 | Record keeping | |
| 9.1 | <p>The site shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p> | <p>Sighted CPO and PK delivery note, weighbridge ticket, production data and internal audit records were found up-to-date.</p> |
| 9.2 | Retention times for all records and reports shall be a minimum of two | |

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| | (2) years and must comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. | Relevant record was maintained for more than 2 years. |
| 9.3 | The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months. | Available. |
| 10 | Conversion factors | |
| 5.10.1 | Where applicable a conversion rate must be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which must be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org). This is in particular relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries. The guidance document for oleochemicals is available on the RSPO website (www.rspo.org). | OER & KER used. |
| 10.2 | Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate. | Actual data available. |
| 11 | Claims | |
| 11.1 | The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO rules on communications and claims. | No claim been made |
| 12 | Complaints | |
| 12.1 | The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints. | Documented procedure has established to address collecting and resolving the complaint. |
| 13 | Management review | |
| 13.1 | The organization is required to hold management reviews at planned intervals appropriate to the scale and nature of the activities undertaken. | Documented procedure has defined management review will be conducted once a year |
| 13.2 | <p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO SCCS • Customer feedback • Status of preventive and corrective actions • Follow-up actions from management reviews • Changes that could affect the management system • Recommendations for improvement | <p>Management review report, doc. Name Management Review Meeting MSPO & RSPO dated in Nov 2018 for SOU Tennamaram</p> <p>Coverage sufficient, among item discussed during audit;</p> <ul style="list-style-type: none"> - follow up actions from earlier management review -Input & Output - sustainability & adequacy of all SOP's - sustainable agriculture policy - result of internal audit - change in legal requirement of any compliance |

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| | | <ul style="list-style-type: none"> - complaint (internal & external) - accident & injury (LTA) - environmental quality - waste management - energy usage performance - status of corrective actions - recommendation for improvement |
| 13.3 | <p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes • Resource needs | <p>Recommendation for improvement Resource sufficient.</p> |

RSPO Supply Chain at the palm oil mill - Module D – CPO Mill: Identity Preserved

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| D 3 D 3.1 | <p>Documented procedures The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements in these requirements; b) 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 site's procedures for the implementation of this standard.</p> | As reported in the table above. |
| D 3.2 | The site shall have documented procedures for receiving and processing certified and non-certified FFBs. | Yes, available. |
| D.4 D.4.1 | <p>Purchasing and goods in</p> <p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> | Tennamaram POM will only accept the RSPO certified FFB which are from Sime Darby's own estates i.e. Sg Buloh Estate, Tennamaram Estate and Bukit Talang Estate. Verified through Tennamaram POM weighing system called ' <i>SimeWeigh</i> ' and random sample of weighbridge ticket from Sg Buloh Estate, Tennamaram Estate and Bukit Talang Estate. |
| D 4.2 | The site shall inform the CB immediately if there is a projected overproduction. | There was no overproduction of certified CSPO but sighted that overproduction of CSPK IP for period Dec 2017 – Nov 2018. Major NCR MZK 01 2018 was raised in this indicator. |
| D.5 D.5.1 | <p>Record keeping The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</p> | Tennamaram POM has maintained the three-monthly accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. |
| D 6 D.6.1 | The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from noncertified material including during transport and storage. | For the period under review, Tennamaram POM has deliver RSPO certified CPO or PK to refinery through road tanker. It was confirmed through interview and traceability report no non-certified material were delivered. |
| D.6.2 | The objective is for 100 % segregated material to be reached. | It was confirmed through summary of weighbridge ticket; PO products were 100% segregated. |

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Attachment 6

Status of Non-conformities Previously Identified

| No. | NCR No. & Indicator | Specification Major/Minor | Non-conformances | Status & Verification by Assessor |
|-----|-----------------------------|---------------------------|--|--|
| 1 | 2.1.1 NCR STK 02 2017 | Major | Findings: Evidence of legal compliance on medical compliance was not available. Objective evidence : 1. Bukit Talang Estate: Evidence to show that the follow up medical surveillance for 17 workers as recommended in Medical Surveillance Report 2016 dated 1/02/2017 was not available. 2. Tennamaram POM: monthly report to DOE regarding disposal schedule of EFB and location of EFB dumping area was not available as per "Jadual Pematuhan". | Monthly report to DOE regarding disposal schedule of EFB and location of EFB dumping area on 05/10/2018 for month of September and on 14/09/2018 for month of August 2018. Thus, previous NCR was satisfactory closed. However, during the audit at Tennamaram and Bukit Talang Estates, there was an instance of a Major recurrence where it was found that Tennamaram and Bukit Talang Estates did not comply with relevant legal requirements under the following legal provisions: a. Immigration Act 1959/63 (Tennamaram Estate) b. Immigration Regulations 1963 (Tennamaram Estate) c. Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000 (Bukit Talang Estate) Hence, this NCR has been upgraded and recommendation for suspension was done accordingly. Status: Refer to 2019 finding closure |
| 2. | 4.1.1 NCR STK 04 2017 | Major | Findings: Standard Operating Procedures (SOPs) for estates on monitoring of peat soils was not available. Objective evidence : On both Tennamaram Estate and Bukit Talang Estate the SOP for monitoring of Peat Soil Subsidence was not available. | The SOP for monitoring of peat soil subsidence is now Not Applicable as there are no peat soils in SOU Tennamaram based on the new soils map provided by Precision Agriculture Unit (NHM) of Sime Darby Research Status: Closed. |
| 3 | 4.1.2 NCR STK 01 2017 | Minor | Findings: The Standard operating procedure (SOP) No.13 - Pemandu Kenderaan (Traktor/Mini Kubota/Jamsa/KG) of Tennamaram Estate was not implemented. Objective evidence : Tennamaram Estate: Hydraulic Oil from Tractor No. TF10 carrying out P&D spraying in Field 2010C was found leaking. | A number of tractors including tractor No. TF10 inspected in the field and workshop were found to be in good order. Status: Closed |

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| 4 | 4.7.2 NCR RAR 02 2017 | Major | <p>Finding:</p> <ul style="list-style-type: none"> Hazards of skimming of oil at clarifier tank are not addressed and documented. Worker's accident is not reviewed and discussed in the OSH meeting <p>Objective evidence : At Tennamaram POM</p> <ul style="list-style-type: none"> Hazard identification and assessment are not documented in the HIRARC file. Worker accident occurred on 18/8/17 was not discussed in the OSH meeting held on 9/11/17 and risk assessment was not reviewed immediately as per SOP-SDPMS Chapter 6. | <p>During site visit at Tennamaram POM, was sighted that Hazards of skimming of oil at clarifier tank was updated on 03/01/2018 to address the risk and hazard in the work units. Also, was sighted that worker accident occurred on 13/06/2018 has been discussed in the OSH meeting and also sighted HIRARAC for activities has been reviewed accordingly on 19/06/2018.</p> <p>Status: Closed.</p> |
| 5 | 5.3.2 NCR RAR 01 2017 | Major | <p>Finding: Chemical containers were not disposed accordingly.</p> <p>Objective evidence : Tennamaram Estate: Schedule waste items (SW 409) was not disposed according to Environmental Quality (Scheduled Wastes) Regulations 2005. Sighted last disposal on 21/03/2017.</p> | <p>TPOM For SW items :</p> <p>i) <i>Regulation 3</i> During site review it was found that there were 8 types of SW generated as per the notification to DOE on 28/11/16.</p> <p>ii) <i>Regulation 9</i> It was found that scheduled wastes were stored not more than 180 days. Last disposal was made on 07/06/2018 by Tex Cycle (P2) Sdn. Bhd' for waste items such as SW 306, SW 409, and SW 322</p> <p>iii) <i>Regulation 11</i> 5th schedule Inventory was updated by monthly basis and tally with the physical stock at the storage area. The inventory was submitted to DOE on 30/10/2018 for October usage.</p> <p><u>Tennamaram Estate</u> Empty chemical containers were triple rinsed and disposed through approved licensed contractors Sykt SS Setia under a recycling program registered under Jabatan Pertanian. Approval through sighting of the following correspondence. Approval license to recycle chemical container Letter dated 24/10/2018 from DOE to contractor "SS Setia Teknologi Enterprise" and Circular dated 7/12/15 from Jabatan Pertanian (Bahagian Kawalan Racun Perosak) on the chemicals containers recycling program. Sighted a latest record of disposal on 07/11/2018 and 30/09/2018.</p> <p><u>Sg Buloh Estate</u> Empty chemical containers were triple rinsed and disposed through approved licensed contractors Sykt SS Setia under a recycling</p> |

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| | | | | <p>program registered under Jabatan Pertanian. Approval through sighting of the following correspondence. Approval license to recycle chemical container Letter dated 24/10/2018 from DOE to contractor "SS Setia Teknologi Enterprise" and Circular dated 7/12/15 from Jabatan Pertanian (Bahagian Kawalan Racun Perosak) on the chemicals containers recycling program. Sighted a latest record of disposal on 29/04/2018 and 30/09/2018.</p> <p>For lubricant oil SW 305 has been disposed through DOE contractor Malik Family Resources technology Sdn Bhd (license no: 003172) on 08/11/2018 and 24/04/2018.</p> <p><u>Bukit Talang Estate</u></p> <p>Empty chemical containers were triple rinsed and disposed through approved licensed contractors Sykt. SS Setia under a recycling program registered under Jabatan Pertanian. Approval through sighting of the following correspondence. Approval license to recycle chemical container Letter dated 24/10/2018 from DOE to contractor "SS Setia Teknologi Enterprise" and Circular dated 7/12/15 from Jabatan Pertanian on the chemicals containers recycling program. Sighted a latest record of disposal on 07/11/2018 and 26/05/2018.</p> <p>Status: Closed.</p> |
| 6 | D.4.1 NCR MZK 01 2017 | Major | <p>Findings: Non-compliance with Sime Darby Plantation SOP Sustainable Supply Chain and Traceability</p> <p>Objective evidence : Tennamaram POM : Consignment note FFB/Weighbridge Ticket from Certified estate did not contain RSPO Certificate No. as per stated in the SOP item 6.0 Delivery of FFB from the Estate</p> | <p>Auditor has sighted that the Consignment note FFB from estate has already contain RSPO certificate No as per stated in the SOP for Sustainable Supply Chain and Traceability item 6.0 Delivery of FFB from the Estate para 6.3. thus, Past Major NCR MZK 01 2017 was closed</p> <p>Status: Closed</p> |

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Attachment 7

RSPO Certification Timebound Plan for Sime Darby Plantation (SDP)

Table 1: Initial Timebound Plan and Summary of RSPO Certification Status

| Financial year (July – June) | Targeted | Achieved/Status | Attachments |
|-------------------------------------|--|---|---|
| Jun-08 | 5 SOUs | <p>Achievement of Timebound Plan Sime Darby Plantation has had all its SOUs (Malaysian & Indonesian) completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2011, all Malaysian SOUs have been RSPO certified (with the exception of 2 new oil mills commissioned to replace the current oil mills after the initial timebound plan targets).</p> <p>97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes. Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. A new mill in Liberia is planned to be commissioned.</p> <p>Note: Time-bound plan to achieve 100% RSPO certification has shifted to 2015 .</p> | <p>For details please refer to Attachments: i) SDP - RSPO Certification Status for Malaysia Operations ii) SDP- RSPO Certification Status for Indonesia Operations iia) Updates on PT MAS iii) RSPO SCCS status for Sime Darby Plantation (Downstream Operations)</p> |
| 2008/2009 | 20 SOUs (from Malaysia and Indonesia) | | |
| 2009/2010 | 20 SOUs (from Malaysia and Indonesia) | | |
| 2010/2011 (End Dec 2011) | 17 SOUs (from Malaysia and Indonesia) | | |

Note: SOU - Strategic Operating Units (consisting of one oil mill and supplying estates)

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Table 2: Details of RSPO Certification Status as at Dec 2017

| Status | Malaysia | Indonesia | Liberia | Total | Remarks |
|--|----------|-----------|---------|-------|--|
| RSPO Certified | 33 | 23 | 0 | 56 | <p>Malaysia * Effectively 33 Mills (Excluding Bintang Oil Mill) - Note: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down, and Pekaka POM is being mothballed.</p> <p>*SDP acquired Bintang Palm Oil Mill, Talisman Estate, and Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bk Paloh Estate of SOU 21 Gunung Mas, while Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut. Lian Seng will be incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018, whilst Talisman Estate has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2017. For Bintang Oil Mill, 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 Dec 2017.</p> <p>Indonesia *Effectively 23 Mills *Note: <i>Angsana Mini POM closed down in 2016. Selabak POM is being mothballed.</i></p> |
| Planned for Certification/Under going Stage 1 or Stage 2 Assessment/ RSPO EB Review | 0 | 1 | 1 | 2 | <p>SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.</p> <p>Indonesia PT MAS has undergone RSPO Main assessment and is delayed due to some social disputes. The target date for certification is by 2017 subject to the progress of the matter being resolved.</p> <p>Smallholders As at Dec 2017, a total of 28,712 Ha of smallholders have been certified. The entire KKPA (1-5) in Sebamban, KKPA Sg. Cengal, and Plasma TGK and SIA (East and West Plasma) are now RSPO certified with a production capacity of 465,602 mt of FFB. Total scheme smallholders hectares are 51,353 and total communities are 22,613.</p> <p>Certification process for the remaining associated smallholders areas is on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and outgrowers by end 2020.</p> <p>Liberia Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification Stage 2 Assessment in March/April 2018. RSPO NPP process has been completed in 2011.</p> |
| Total SOUs | 33 | 24 | 1 | 58 | <p>Other remarks: In March 2015, Sime Darby Plantation completed the acquisition of New Britain Palm Oil Limited (NBPOL). NBPOL is managed under a separate entity and the reporting of timebound plan will be under NBPOL's management. NBPOL is considered as a different entity/member under the RSPO and NBPOL is 100% RSPO Certified.</p> |

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SDP - RSPO Certification Status for Malaysia Operations

| SOU NO | Name of SOU | Location | Date of Certification | End Date of Certification | Certificate Number | Remarks |
|--------|-----------------|-------------------------------|-----------------------|---------------------------|--|---|
| 1 | Sg. Dingin | Karangan, Kedah | 12 Aug '10 | 11-Aug-20 | SPO 550179 | |
| 2 | Chersonese | Kuala Kurau, Perak | 5 Oct '11 | 4-Oct-21 | CU-RSPO-815148, RSPO 590800 | |
| 3 | Elphil | Sg Siput, Perak | 18 Jun '11 | 17-Jun-21 | RSPO 550180 | |
| 4 | Flemington | Teluk Intan, Perak | 5 Oct '11 | 4-Oct-21 | CU-RSPO-819144, RSPO 590802 | |
| 5 | Seri Intan | Teluk Intan, Perak | 3 Mar '11 | 2-Mar-21 | CU-RSPO-811218, RSPO 0015 | |
| 5 | Selaba | Teluk Intan, Perak | 3 Mar '11 | 2-Mar-21 | CU-RSPO-819142, RSPO 0016 | |
| 5a | Sg Samak | | 3 Mar '11 | NA | NA | |
| 6 | Tennamaram | Bestari Jaya, Selangor | 3 Mar '11 | 2-Mar-21 | CU-RSPO-819143, RSPO 0014 | |
| 7 | Bkt Kerayong | Kapar, Selangor | 15 Apr '11 | 14-Apr-21 | RSPO 550181 | |
| 8 | East | Carey Island, Selangor | 19 May '10 | 18-May-20 | SPO 543543 | |
| 9 | West | Carey Island, Selangor | 19 May '10 | 18-May-20 | SPO 543594 | |
| 9a | Sepang | Sepang, Selangor | 19 May '10 | NA | NA | |
| 10 | Bukit Puteri | Raub, Pahang | 7 Jul '11 | 6-Jul-21 | CU-RSPO-815147, 18502206 001, 824 502 14020 | |
| 11 | Kerdau | Temerloh, Pahang | 7 Jul '11 | 6-Jul-21 | CU-RSPO-819155, 18502207 001, 824 502 14019 | |
| 12 | Jabor | Kuantan, Pahang | 7 Jul '11 | 6-Jul-21 | CU-RSPO-819156, RSPO 928288, 824 502 16049 | |
| 13 | Labu | Nilai, Negeri Sembilan | 30 Dec '11 | 29-Dec-21 | CU-RSPO-819163, SGSRSPO/PM/MY13/01284, 824 502 16039, SGS-RSPO/PC17-00004, CURSPO-855480 | |
| 14 | Tanah Merah | Port Dickson, Negeri Sembilan | 19 May '10 | 18-May-20 | SPO 541905 | |
| 15 | Sua Betong | Port Dickson, Negeri Sembilan | 18/2/2014 | 17-Feb-19 | SGS-RSPOPM-MY14/01364, 824 502 16032 | Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill with Certificate No: CU- RSPO-819165, certification date: 30 Dec 2011. |
| 16 | Kok Foh | Bahau, Negeri Sembilan | 7 Jul '11 | 6-Jul-21 | CU-RSPO-819157, RSPO 928188, 824 502 16051 | |
| 17 | Kempas | Jasin, Melaka | 19 May '10 | 18-May-20 | RSPO 005 | |
| 18 | Diamond Jubilee | Jasin, Melaka | 5 Oct '11 | 4-Oct-21 | CU-RSPO-819146, RSPO 591224 | |
| 19 | Pagoh | Muar, Johor | 28/1/2014 | 27-Jan-19 | RSPO 600305 | Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011. |

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| 19a | Yong Peng | Yong Peng, Johor | 20 Oct '10 | 19-Oct-15 | RSPO 550182 | |
| 20 | Chaah | Chaah, Johor | 18 Nov '10 | 17-Nov-20 | RSPO 548299 | |
| 21 | Gunung Mas | Kluang, Johor | 19 May '10 | 18-May-20 | RSPO 901888 | |
| 22 | Bukit Benut | Kluang, Johor | 5 Oct '11 | 4-Oct-21 | CU-RSPO-819147, RSPO 591229 | |
| 23 | Ulu Remis | Layang-layang, Johor | 11 Apr '11 | 10-Apr-21 | SGS-RSPO/PM-00722, 824 502 16042 | |
| 24 | Hadapan | Layang-layang, Johor | 29 Mar '11 | 28-Mar-21 | SGS-RSPO/PM-00715, 824 502 16040, BVC-RSPO20170623-01 | |
| 25 | Segaliud | Sandakan, Sabah | 20 May '10 | 19-May-15 | RSPO 547123 | |
| 26 | Sandakan Bay | Sandakan, Sabah | 1 Oct '08 | 30-Sep-18 | RSPO 537872 | |
| 27 | Melalap | Tenom, Sabah | 21 Jan '11 | 20-Jan-21 | RSPO 547124 | |
| 28 | Binuang | Kunak, Sabah | 16 Jan '09 | 12-Jul-20 | RSPO 001 | |
| 29 | Giram | Kunak Sabah | 16 Jan '09 | 12-Jul-20 | RSPO 002 | |
| 30 | Merotai | Tawau, Sabah | 16 Jan '09 | 12-Jul-20 | RSPO 004 | |
| 30a | Jeleta Bumi | Kunak, Sabah | 24/5/2010 | NA | NA | |
| 30b | Mostyn | Kunak Sabah | 16 Jan '09 | NA | NA | |
| 31 | Lavang | Bintulu, Sarawak | 30 Dec '11 | 29-Dec-21 | CU-RSPO-819166, MUTU-RSPO/053 | |
| 32 | Rajawali | Bintulu, Sarawak | 30 Dec '11 | 29-Dec-21 | CU-RSPO-819167, RSPO 0020 | |
| 33 | Derawan | Bintulu, Sarawak | 30 Dec '11 | 29-Dec-21 | CU-RSPO-819169, RSPO 0019 | |
| 34 | Pekaka | Bintulu, Sarawak | 30 Dec '11 | 29-Dec-21 | CU-RSPO-815150, MUTU-RSPO/054 | Mill is mothballed, supply base merged into Lavang effective Dec 2017. |

Legends:

Certification
Withdrawal

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SDP- RSPO Certification Status for Indonesia Operations

| NO | Name of PT | Name of Mill | Location | Date of Certification | End Date of Certification | Certificate Number | Remarks |
|----|------------------------------|----------------|--|-----------------------|---------------------------|---|--|
| 1 | PT LAHAN TANI SAKTI | ALUR DUMAI | Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau | 16-Jan-12 | 15-Jan-22 | MUTU-RSPO/011, SGS-RSPO/PC17-00005, SGS-RSPO/PC17-00005 | |
| 2 | PT SAJANG HEULANG | ANGSANA MINI | Sebamban, Indonesia | 6-Jul-11 | 6-Jul-16 | MUTU-RSPO/006b | Mill closed down |
| 3 | PT SAJANG HEULANG | MUSTIKA | Sebamban, Indonesia | 3-Jul-13 | 3-Jul-18 | MUTU-RSPO/027 | |
| 4 | PT LADANGRUMPUN SUBURUBADI | ANGSANA | Sebamban, Indonesia | 9-Nov-16 | 8-Nov-21 | MUTU-RSPO/006a | |
| 5 | PT LANGGENG MUARAMAKMUR | BEBUNGA | Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur | 16-Mar-12 | 3-Aug-22 | MUTU-RSPO/014 | Recertification of Bebunga POM is in progress. |
| 6 | PT KRIDATAMA LANCAR | SUKAMANDANG | Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah | 2-Sep-16 | 1-Sep-21 | MUTU-RSPO/003 | |
| 7 | PT BAHARI GEMBIRA RIA | LADANG PANJANG | Kumpeh Ulu, Jambi, Muaro Jambi, Jambi | 9-Jul-12 | 28-Nov-22 | MUTU-RSPO/019 | |
| 8 | PT TUNGGAL MITRA PLANTATIONS | MANGGALA | Riau, Indonesia | 25-Nov-10 | 24-Nov-20 | MUTU-RSPO/002 | |
| 9 | PT PARIPURNA SWAKARSA | PONDOK LABU | Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan | 16-Mar-12 | 19-Jul-22 | MUTU-RSPO/016 | Recertification of Pondok Labu POM is in progress. |
| 10 | PT BERSAMA SEJAHTERA SAKTI | GUNUNG ARU | Sebamban, Indonesia | 21-Oct-16 | 20-Oct-21 | MUTU-RSPO/005 | |

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| 11 | PT GUTHRIE PECCONINA | RANTAU PANJANG | Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan | 16-Mar-12 | 19-Nov-22 | MUTU-RSPO/017 | Recertification of Rantau Panjang POM is in progress. |
| 12 | PT LAGUNA MANDIRI | RANTAU | Sungai Durian, Kotabaru, Kalimantan Selatan | 30-Dec-11 | 05-Feb-22 | MUTU-RSPO/009 | |
| 13 | | BETUNG | | 1-April-14 | 1-April-19 | MUTU-RSPO/035 | |
| 14 | PT INDOTRUBA TENGAH | SEKUNYIR | Kalimantan Tengah, Indonesia | 23-Nov-10 | 22-Nov-20 | MUTU-RSPO/001 | |
| 15 | PT SWADAYA ANDIKA | SELABAK | Sungai Durian, Kotabaru, Kalimantan Selatan | 16-Mar-12 | 16-Mar-17 | MUTU-RSPO/015 | Mill is mothballed. |
| 16 | PT BINA SAINS CEMERLANG | SG PINANG | Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan | 11-Sep-12 | 28-Nov-22 | MUTU-RSPO/020 | |
| 17 | PT TEGUH SEMPURNA | PEMANTANG | Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah | 9-Sep-16 | 8-Sep-21 | MUTU-RSPO/004 | |
| 18 | PT BHUMIREKSA NUSA SEJATI | TELUK BAKAU | Pelangiran, Sg. Guntung, Indragiri Ilir, Riau | 01-Dec-16 1 April 2014 | 30-Nov-21 1 April 2019 | MUTU-RSPO/008 | |
| 19 | | MANDAH | | | | MUTU-RSPO/036 | |
| 20 | PT ANEKA INTIPERSADA | TELUK SIAK | Tualang, Perawang, Siak, Riau | 8-Dec-16 | 7-Dec-21 | MUTU-RSPO/007 | |
| 21 | PT TAMACO GRAHA KRIDA | UNGKAYA | Witaponda, Kolonodale, Morowali, Sulawesi Tengah | 10-Jul-12 | 28-Dec-22 | MUTU-RSPO/018 | |

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| 22 | PT SIME INDO AGRO | BK AJONG | Kalimantan Barat, Indonesia | 18-Jul-16 | 17-Jul-21 | MUTU-RSPO/088 | |
| 23 | PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI | BLANG SIMPO | Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam | 3-May-13 | 3-May-18 | MUTU-RSPO/026 | |
| 24 | PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI | LEMBIRU | Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat | 3-Jul-14 | 2-Jul-19 | MUTU-RSPO/044 | |
| 25 | PT MITRAL AUSTRAL SEJAHTERA | MAS Mill | Desa Rahayu Kec. Parindu Kab. Sanggau, Kalimantan Barat | NA | NA | NA | |

Legends

Pending Certification by RSPO Mill closed down/Mothballed

NA - NOT APPLICABLE