

#### SIRIM QAS INTERNATIONAL SDN. BHD.

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

File Ref.: ES10171014

### RSPO PUBLIC SUMMARY REPORT

CLIENT

: SIME DARBY PLANTATION BERHAD - SOU 32 RAJAWALI

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	Mill / Supply Base	<b>GPS Location</b>		Location
Unit	Init Willi / Supply Base		Longitude	Location
,	Rajawali Palm Oil Mill	N 3° 22' 14.4"	E 113° 24' 1.1"	97011 Bintulu, Sarawak
SOU 32	Rajawali Estate	N 3.42595°	E 113.37900°	97008 Bintulu, Sarawak
Rajawali	Samudera Estate	N 3° 28' 55.0"	E 113° 23' 51.0"	97012 Bintulu, Sarawak
	Semarak Estate	N 3.22536°	E 113.35600°	97011 Bintulu, Sarawak
	Bayu Estate	N 3° 28' 56.0"	E 113" 23' 51.0"	97012 Bintulu, Sarawak

MAP: See Attachment 1 AUDIT DATE : 18 - 21 September & **DURATION** 16.0 auditor days 9 - 10 October 2018 **TYPE OF AUDIT:** Annual Surveillance Audit No. **Recertification Audit** STANDARD: RSPO PRINCIPLE & CRITERIA MYNI 2014, AND RSPO SUPPLY CHAIN CERTIFICATION STANDARD 2014 (REVISED 14 JUNE 2017) SCOPE OF CERTIFICATION: Production of Sustainable Crude Palm Oil and Palm Kernel Using the Identity Preserved Supply Chain Model VALIDITY OF RSPO CERTIFICATE: 30/12/2016 - 29/12/2021 The following attachments form part of this report: Non-conformity Report(s) List of additional site(s) Report by Audit Team Leader Acknowledgement by Client's Representative SIME DARBY PLANTATION (SARAWAK) SDN BHD Name Selvasingam T Kandiah Name No. 179365-M) (Company Signature Signature Assistant Manager SQM Date 31 December 2018 Date

## **SUMMARY OF AUDITS**

Stage 2 audit / Recertification audit						
On-site audit date	:	19th - 23	rd Septen	nber 2016	No. of auditor days :	13.5 Auditor days
Audit team	:	Mohd Zul	fakar Kan	naruzaman (LA), J	agathesan a/l Supiah, Se	lvasingam T. Kandiah,
No. of major NCR	:	-	Indicator	:-		Closing date : -
No. of minor NCR	:	5	Indicator			
Indicate the	:	Employee	es	Settlers	Villagers	Suppliers
stakeholders		1				$\sqrt{}$
interviewed during the on-site audit		Contract	workers	NGOs	Govt. agency	Independent growers
on-site addit		Indigenou people	ıs	Contractor	Others (Please specify	)
				\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		
Supply base sampled	:	Semarak	& Samud	era Estate		
Report approved by	:	Aminah A	ng		Approval date: 20/12/2	2016

Annual Surveillance Aud	lit 1					
On-site audit date	:	9-13 Oct 2017			No. of auditor days :	13.5 Auditor days
Audit team	:	Rozaime	e Ab Rahm	nan (TLA), Mohd Zu	ılfakar Kamaruzaman, H	lazani Othman
No. of major NCR	:	3	Indicator:	2.1.1, 4.4.2 & 4.5.3	3 (certification system)	Closing date :12/12/17
No. of minor NCR	:	2 Indicator: 2.1.3, 4.6.10				<u> </u>
Indicate by ticking the	:	Employee	es	Settlers	Villagers	Suppliers
stakeholders interviewed		1	/		√ √	√ √
during the on-site audit		Contract	workers	NGOs	Govt. agency	Independent growers
		Indigenou	ıs people	Contractor	Others (Please specify	y)
				√		
Supply base sampled	:	Rajawali & Bayu Estate				
Changes since the last audit	:	No change.				
Report approved by	:	Radziah	Mohd. Dau	d	Approval date: 16	/01/2018

Annual Surveillance Audit 2						
On-site audit date		10 21/0			No. of auditor days :	13.5 Auditor days
	•	18 – 21/9/2018 & 9 -10/10/2018   No. of auditor days :   13.5 Auditor days   Selvasingam T. Kandiah (TLA), Rozaimee Ab Rahman, Hazani Othman, Amir B Bahari				
Audit team	•				nee Ab Ranman, Hazan	
No. of major NCR	:	2	Indicator:	4.7.3 & 6.5.1		Closing date : 28/12/2018
No. of minor NCR	:	1	Indicator	: 4.1.2		
Indicate by ticking the stakeholders interviewed	:	Employe	es	Settlers	Villagers / Local communities	Suppliers
during the on-site audit					$\sqrt{}$	$\sqrt{}$
		Contract	workers	NGOs	Govt. agency	Independent growers
		Indigenous people		Contractor	Others (Please specify	y)
		1	V	V		
Supply base sampled	:	Rajawali,	Samudera	, Semarak & Bayu	Estates	
Changes since the last audit	:	No change.				
Justification of audit	:	Total allo	cation of a	udit man day for SC	DU Rajawali were:	
planning		<ul> <li>Rajawali POM = 4 auditor days (total workers 120, for safety and health, environment, mill best practices, GHG verification, etc with 1 day for supply chain certification systems)</li> <li>Rajawali, Samudera, Semarak &amp; Bayu Estate = 3 auditor days for each estates (monitoring on critical areas such as buffer zone areas, boundary forest reserve, neighbouring villagers, stakeholder, etc. verified safety and</li> </ul>				

	health, environment, good agr	iculture best practices, GHG verification, etc)	
Report approved by	 Radziah Mohd Daud	Approval date: 31/12/2018	

		Annual	Surveillance A	udit 3	
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	:	Employees	Settlers	Villagers / Local communities	Suppliers
during the on-site audit		Contract workers	NGOs	Govt. agency	Independent growers
		Indigenous people	Contractor	Others (Please specif	у) 
Supply base sampled	:				
Changes since the last audit	:				
Justification of audit planning	:				
Report approved by	:			Approval date:	

		Annual	Surveillance Au	ıdit 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	:	Employees	Settlers	Villagers / Local communities	Suppliers
during the on-site audit					
		Contract workers	NGOs	Govt. agency	Independent growers
		Indigenous people	Contractors	Others (Please specif	(y)
Supply base sampled	:				
Changes since the last	:				
audit					
Justification of audit	:				
planning					
Report approved by	:			Approval date:	

## **SUMMARY OF INFORMATION**

## TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4	
Projection Period	Sept 2016 –	Oct 2017 –	Oct 2018 –			
Certified FFB Processed (MT)	Aug 2017 174,801.72	Sept 2018 175,617.77	Sept 2019 149,129.74			
Production of Certified CPO (MT)	38,456.37	44,785.82	33,554.19			
Production of Certified PK (MT)	8,225.39	8,679.21	7,158.23			
Certified Areas (Ha)	14,493.00	*14,315.01	*14,315.01			
Planted Areas (Ha)	9,851.22	9,851.22	9,851.22			
Production Areas (Ha)	8,676.65	7,961.55	7,331.75			
HCV Areas (Ha)	-	-	**275.40			
REMARKS	*177.99 ha certified area has been taken (from 2016 data) by the government to construct Pan Borneo highway and BDA project.  **The reported areas was determined based on the latest re-assessment; the "High Conservation Value (HCV) Final Report (Version 2.0)", dated in June 2017.					
	Conservation Valu	e (HCV) Final Repo	ort (Version 2.0)", da	ted in June 2017.		

## TABLE 2

	РО	PK
Last years certified volume (MT)	44,785.82	8,679.21
Last years actual certified sold (MT)	33,579.14	7,550.69
Last years actual sold under other schemes (MT)	-	-
Last years sold conventional (MT)	-	-
New year certified volume (MT)	33,554.19	7,158.23

Tabl	e of contents	Page
1.0	AUDIT PROCESS	6
	1.1 Certification body	6
	1.2 Qualification of audit team	6
	1.3 Audit methodology	6
	1.4 Audit plan	7
	1.5 Date of next audit	7
2.0	SCOPE OF CERTIFICATION AUDIT	7
	2.1 Description of the certification unit	7
	2.2 Description of the Supply Base (including planting profile)	7
	2.3 Organization Information / Contact Person(s)	10
3.0	AUDIT FINDINGS	11
	3.1 Changes to certified products in accordance to the production of the previous year	11
	3.2 Time bound plans including changes and reasons for the changes see below	11
	3.3. Overall comment in terms of acceptance or non acceptance on the changes in the time-bound plan (including details of non-adherence or the conditions justifying a time- bound plan have changed)	11
	3.4 All associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, are audited within 3 years from when their fruit was first included in the mill certification.	12
	3.5 Any new acquisition which has replaced primary forests or HCV areas	12
	3.6 Other changes (e.g. organizational structure, new contact person, addresses, etc.)	12
	3.7 Status of previous non-conformities * (refer to Attachment 6)	12
	3.8 Complaint received from stakeholder (if any)	12
4.0	DETAILS OF NON-CONFORMITY REPORT	12
	4.1 For P&C (Details checklist refer to Attachment 3)	12
	4.2 For SC (Details checklist refer to Attachment 5)	12
5.0	AUDIT CONCLUSION	12
6.0	RECOMMENDATION	13
	List of Attachment	
	Attachment 1 : Map of Rajawali CU	14
	Attachment 2 : RSPO Surveillance Audit Plan	15
	Attachment 3 RSPO P&C Audit Checklist And Findings	19
	Attachment 4 : Details of Non-conformities and Corrective Actions Taken	54
	Attachment 5 RSPO Supply Chain at the palm oil mill – Identity Preserved Model – Module D	56
	Attachment 6 : Status of Non-conformities Previously Identified	<mark>66</mark>
	Attachment 7 : Time-hound Plan	68

#### 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
Selvasingam T Kandiah	Trainee Lead Auditor / Good Agricultural Practices	Holds a B. Sc (Hons) in Agriculture. He had worked as a planter with Kumpulan Guthrie Berhad before retiring. He has 28 years of experience including 1 year in Liberia and 2 years in Estate Department of Kumpulan Guthrie.
Rozaimee Ab. Rahman	Auditor / Environment and HCV	Holds a B. Sc. Of Agriculture. He had several years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C and MSPO.
Hazani Othman	Auditor / Social	Holds a Bachelor of Forestry Science and Diploma in Forestry, from the Universiti Putra Malaysia. He is a lead auditor for ISO 14001, FSC, MTCC, FMC, CoC and RSPO P&C.
Amir B Bahari	Auditor / Safety and Environment	Holds a B.Sc. (Hons) in Chemistry from Universiti Sains Malaysia and has served the plantations industry for 30 years. He has been involved in ISO 9001, ISO 14001 and EMS OHSAS 18001 implementation during the tenure of service.
Suzalina Binti Kamaralarifin	Auditor / Supply Chain	Holds a B. Sc. of Industrial Chemistry from University Teknologi Malaysia. She had 8 years of working experience in the palm oil related industry of POM, Oleo chemical & refinery. She is a qualified Lead Auditor for RSPO Supply Chain.

#### 1.3 Audit methodology

The audit covered Rajawali palm oil mill and 4 of its supply base. The sampling of the number of the supply base was using the formula of  $0.8 \sqrt{y} \times z$ . The 4 supply base covered during the audit are Rajawali Estate estate, Samudera Estate, Semarak Estate and Bayu Estate . The audit included an onsite audit to the estates, mill and settlers' houses 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 9 months from this audit.

#### 2.0 SCOPE OF CERTIFICATION AUDIT

### 2.1 Description of the certification unit

The Rajawali Certification Unit (CU) is one of the the Strategic Operating Unit (SOU) of Sime Darby Plantation Berhad. (SDP). The CU is also known as SOU 32 and consisted of Rajawali Palm Oil Mill (RPOM), Rajawali Estate, Samudera Estate, Semarak Estate and Bayu Estate. The CU is located about 100km from Bintulu town and is accessible via the Bintulu-Miri Road.

Rajawali POM commenced its operations in 1993 with a processing capacity of 60 metric tonnes of (FFB) per hour. The total combined land area of the four estates is 14,315.01 hectares (Ha) of which 9,851.22 Ha had been planted with oil palm. 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. The CU has MSPO certification.

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

The FFB is sourced from the company's own estates that were certified. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

<u>Table 1: Actual FFB production by the supply base for the last reporting period</u>
(Oct 2017 – Sept 2018)

ototoo	FFB Production			
states	Tonnes	Percentage (%)		
Rajawali	42,396.91	29.07		
Samudera	34,770.03	23.84		
Semarak	31,185.18	21.39		
Bayu	37,469.53	25.70		
Total	145,821.65	100.00		

<u>Table 2: Projected FFB production by supply base for the next reporting period</u>
(Oct 2018 – Sept 2019)

CU own estates	FFB Cont	ribution
CO OWIT Estates	Tonnes	Percentage (%)
Rajawali	49,432.99	33
Samudera	32,672.93	22
Semarak	29,732.72	20
Bayu	37,291.10	25
Total	149,129.74	100

Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period (Oct 2017 – Sept 2018)

	Total (MT)
FFB Received	159,756.85
FFB Processed	159,756.85
CPO Production	34,554.19
PK Production	7,609.22
CPO delivered as RSPO certified	33,579.14
CPO delivered as non-RSPO certified	0.00
PK delivered as RSPO certified	7,550.69
PK delivered as non-RSPO certified	0.00

<u>Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period</u>
(Oct 2018 – Sept 2019)

	Total (MT)
FFB Received	149,129.74
FFB Processed	149,129.74
CPO Production	33,554.19
PK Production	7,158.23
CPO delivered as Identity Preserved	33,554.19
CPO delivered as non-RSPO certified	0
PK delivered as Mass Balance / IP	7,158.23
PK delivered as non-RSPO certified	0

### Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Rajawali	3,374.71	6,868.01
Samudera	2,050.38	2,608.00
Semarak	2,242.78	2,598.00
Bayu	2,183.35	2,241.00
Total	9,851.22	14,315.01

### Table 6 Planting profile summary for the CU

<u>Estate</u>	<u>Year of</u> establishment	<u>Mature</u> ( <u>Ha)</u>	Immature (Ha)	Planted area	% of planted area mature	% of planted area immature
Rajawali Estate	1993	2,405.99	968.72	3,374.71	71.29	28.71
Samudera Estate	1995	1,608.93	441.45	2,050.38	78.47	21.53
Semarak Estate	1990	1,582.36	660.42	2,242.78	70.55	29.45
Bayu Estate	1996	1,734.47	448.88	2,183.35	79.44	20.56
	Total	7,331.75	2,519.47	9,851.22	74.42	25.58

Table 7: Planting profile for Rajawali Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2018	2 <sup>nd</sup>	Immature	346.25	10.26
2017	2 <sup>nd</sup>	Immature	239.45	7.10
2016	2 <sup>nd</sup>	Immature	194.83	5.77
2015	2 <sup>nd</sup>	Immature	188.19	5.58
2015	2 <sup>nd</sup>	Mature	101.40	3.00
2014	2 <sup>nd</sup>	Mature	210.12	6.23
2013	2 <sup>nd</sup>	Mature	206.32	6.11
2004	1 <sup>st</sup>	Mature	56.56	1.68
2003	1 <sup>st</sup>	Mature	41.60	1.23
2002	1 <sup>st</sup>	Mature	39.68	1.18
2000	1 <sup>st</sup>	Mature	85.76	2.54
1997	1 <sup>st</sup>	Mature	354.47	10.50
1996	1 <sup>st</sup>	Mature	1114.32	33.02
1995	1 <sup>st</sup>	Mature	195.76	5.80
Total	_		3,374.71	100

Table 8: Planting profile for Semarak Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1993	1 <sup>st</sup>	Mature	245.11	10.93
1994	1 <sup>st</sup>	Mature	883.20	39.38
1995	1 <sup>st</sup>	Mature	192.34	8.58
1996	1 <sup>st</sup>	Mature	154.21	6.88
2004	2 <sup>nd</sup>	Mature	107.50	4.79
2016	2 <sup>nd</sup>	Immature	375.39	16.74
2017	2 <sup>nd</sup>	Immature	176.61	7.87
2018	2 <sup>nd</sup>	Immature	108.42	4.83
Total			2,242.78	100

Table 8: Planting profile for Samudera Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1998	1 <sup>st</sup>	Mature	570.38	27.82
1999	1 <sup>st</sup>	Mature	214.46	10.46
2000	1 <sup>st</sup>	Mature	824.09	40.19
2016	2nd	Immature	145.72	7.11
2017	2 <sup>nd</sup>	Immature	106.55	5.20
2018	2 <sup>nd</sup>	Immature	189.18	9.23
Total			2,050.38	100

Table 9: Planting profile for Bayu Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1998	1 <sup>st</sup>	Mature	393.55	18.02
1999	1 <sup>st</sup>	Mature	217.75	9.97
2000	1 <sup>st</sup>	Mature	1093.12	50.07
2006	2 <sup>nd</sup>	Mature	8.9	0.41
2008	2 <sup>nd</sup>	Mature	5.85	0.27
2010	2 <sup>nd</sup>	Mature	15.3	0.70
2017	2 <sup>nd</sup>	Immature	255.38	11.70
2018	2 <sup>nd</sup>	Replant	193.5	8.86
Total			2183.35	100

# 2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

Name	:	Mr. S. Batumalasamy
Position	:	Estate Manager
Address	:	Sarawak Zone Office
		Rajawali Complex, KM 52,
		Jln Bintulu-Miri, P.O. Box 673,
		97008, Bintulu, Sarawak
		Rajawali Estate,
		P.O Box 673, 97008 Bintulu,
		Sarawak, Malaysia
Phone no.	:	+6086-477313/019-4591967
Fax no.	:	+6086-477313
Email	:	ldg.rajawali@simedarby.com

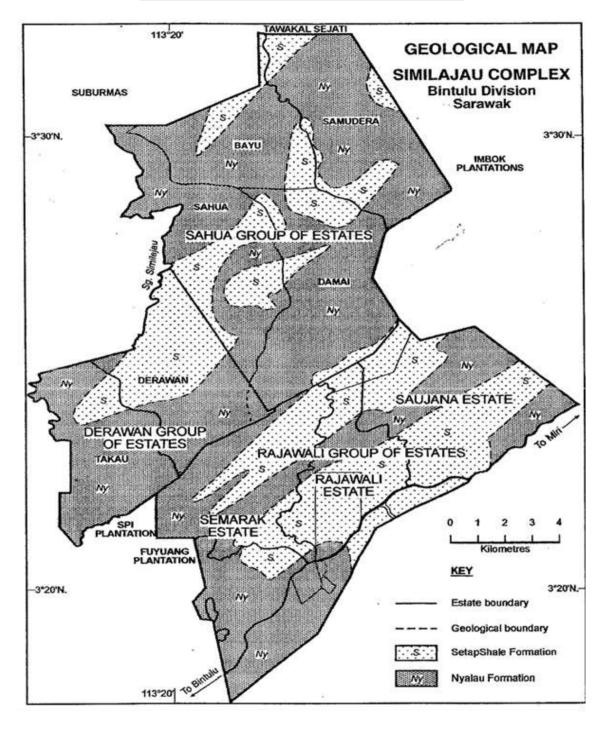
3.0	AUDIT FINDINGS
3.1	Changes to certified products in accordance to the production of the previous year
	There was no change to the certified products in accordance to the production since last assessment.
3.2	Progress and changes in time bound plan (Refer to Attachment 7 for the time bound plan)
i.	Have all the estates under the parent company been certified?
	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?
	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 $_{\sqrt{}}$ Yes $_{\sqrt{}}$ No
	If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its Pes No certification?
	If no, please state reasons NA
iv.	Any new acquisition which has replaced primary forests or HCV areas $$ No
3.3	Other changes (e.g. organizational structure, new contact person, addresses, etc.)
	The New contact person is Mr. S. Batumalasamy. The Palm Oil Mill manager now is Mr. Sharir Bin Abdullah. SDPB will be changing its Financial year from July to June to Calendar Year effective January 2019. The current financial year 2017/2018 will end in December this year i.e. 2018.

3.4	Status of previous non-conformities * If not closed, minor non conformity Complaint received from stakehold No complaints from stakeholders w	will be upgrad ler (if any)	, , , , , , , , , , , , , , , , , , ,
4.0	DETAILS OF NON-CONFORMITY	' REPORT	
4.1	For P&C (Details checklist refer to	Attachment 3	3):
	Total no. of minor NCR(s) (details refer to Attachment 4)	List:1	STK 01 2018
	Total no. of major NCR(s) (details refer to Attachment 4)	List: 2	STK 02 2018, HO 02 2018
4.2	For SC (Details checklist refer to A	ttachment 5)	:
	Total no. of minor NCR(s) (details refer to Attachment 5)	List : Nil	NA
	Total no. of major NCR(s) (details refer to Attachment 5)	List: Nil	NA
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.		

6.0	RECOMM	IENDATIC	ON							
		No NCR recorded. Recommended to continue certification.								
	V	Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.								
			lote: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs .							
	V		CR(s) recorded. Evidence of im and accepted by the audit team.							
	V	Recommended to continue certification.								
		provided	CR(s) recorded. Evidence of im but not fully accepted by the au ut within 60 days of the audit. Re	dit team. NCR(s) have	not been satisfactorily					
			ajor NCRs which are not addr e being withdrawn.	essed within a further 60 da	rys shall result in the					
7.0	TI 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.									
Aud	Audit Team Leader :		Selvasingam T Kandiah	Dur	28/12/2018					
		_	(Name)	(Signature)	(Date)					

Attachment 1

### Location map of Rajawali Certification Unit, Bintulu



Attachment 2

#### 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 : 18 – 21 Sept 2018 & 9 – 10 Oct 2018

3. Site of assessment : SOU Rajawali

Rajawali Palm Oil Mill
Rajawali Estate
Samudera Estate
Semarak Estate

Bayu Estate

#### 4. Reference Standard:

- a. RSPO P&C MYNI:2014
- b. RSPO Certifications Systems for P&C, June 2017
- c. RSPO Supply Chain Standard, November 2014 (Revised 14 June 2017)
- d. Company's audit criteria including Company's Manual / Procedures

#### 5. Assessment Team

a) Lead Auditor : SELVASINGAM T KANDIAH (GAP, Safety)

b) Auditors : AMIR B BAHARI (Environmental, Safety, Health, Time Bound Plan

: ROZAIMEE AB RAHMAN (Environmental, Safety, Health, HCV)

: HAZANI Othman (Social)

: SUZALINA BINTI KAMARALARIFIN (SC)

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. <u>Major</u> non conformities shall be addressed within <u>90 days</u> 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 <u>five or more major</u> non-compliances <u>within one Principle</u> found during the audit, <u>immediate suspension</u> 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	АВ	RAR	НО	STK
Day 0-17/9/18	MH 2594: Audit team All 4 auditors travel from KLIA to Miri.	1	,	/	/
5.30pm- 7.35pm	Representative from Rajawali to arrange transportation from Miri Airport to Rajawali Guest House	_ ′	,	,	
Day 1-18/9/18 8.30am – 9.15am	<ul> <li>Opening Meeting – Venue: Rajawali POM</li> <li>Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes</li> <li>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.</li> </ul>	/	/	/	,
9.15am – 12.30pm	Site observation to Rajawali POM P1, P2, P3, P4, P5, P6, P7, P8  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	1	1	1	/
12.30pm – 1.30pm	Lunch Break				
1.30pm – 5.00pm	Continue assessment at respective sites	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	AB	RAR	НО	STK
Day 2 – 19/9/18 8.30am – 12.30pm	Site observation to Rajawali Estate P1, P2, P3,P4,P5, P6, P7,P8  • 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 harvesting, weeding, spraying, EFB mulching, • IPM New planting - Environmental management, waste & chemical management	1	/	/	/
12.30pm – 1.30pm	Lunch Break	<u> </u>		_	
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	AB	RAR	НО	STK
Day 3 – 20/9/18 8.30am – 12.30pm	Site observation to Semarak Estate P1, P2, P3,P4,P5, P6, P7,P8  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 harvesting, weeding, spraying, EFB mulching, IPM New planting - Environmental management, waste & chemical management Lunch Break	1	1	/	/
12.30pm - 1.30 pm	Fairet Diegy		l .		l .

1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	AB	RAR	НО	STK
Day 4 – 21/9/18 8.30am – 12.30pm	Site observation to Bayu Estate P1, P2, P3,P4,P5, P6, P7,P8  • 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 harvesting, weeding, spraying, EFB mulching, • IPM New planting • Environmental management, waste & chemical management	1	/	/	/
Date / Time	Coverage of assessment / Activity / Site	AB	RAR	НО	STK
12.30pm – 1.30 pm	Lunch Break				
1.30pm –5.00pm	Continue assessment at respective site	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site  Site observation to Samudera Estate	AB	RAR	НО	STK
Day 5 – 9/10/18 8.30am – 12.30pm	<ul> <li>P1, P2, P3,P4,P5, P6, P7,P8</li> <li>Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the mill</li> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> <li>Occupational safety &amp; health aspects, chemical management</li> <li>Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching,</li> <li>IPM New planting</li> <li>Environmental management, waste &amp; chemical management</li> </ul>		/	1	
12.30pm – 1.30 pm	Lunch Break				
1.30pm –5.00pm	Continue assessment at respective site		/	/	
Date / Time	Coverage of assessment / Activity / Site	AB	RAR	НО	STK
Day 6 – 10/10/18 8.30am – 12.30pm	Site observation to Samudera Estate P1, P2, P3,P4,P5, P6, P7,P8  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 harvesting, weeding, spraying, EFB mulching, IPM New planting Environmental management, waste & chemical management		,	/	
12.30pm – 1.30pm	Lunch Break				
1.30pm – 4.00pm	Continue assessment at respective site		/	/	
4.00pm – 5.00pm	Closing meeting Samudera Estate		/	/	

### **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 information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in	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	Rajawali CU continued to implement their documented communication procedure. As the time the audit is penned there was no request for information from the stakeholders being recorded. All the estates and mill audited provide availability of management documents i.e. related to environment, and social and legal issues were available to the public except for those prevented by commercial confidentially or where disclosure of information that would potentially result in negative environmental or social outcomes. SDPB continued to use website for disseminating public information which are available in the company's website <a href="http://plantation.simedarby.com">http://plantation.simedarby.com</a> . Information among others in relation to the following; land titles, safety and health plans, pollution prevention plans and procedure for complaints and grievances.
appropriate languages and forms to allow for effective participation in decision making.	1.1.2	Records of requests for information and responses shall be maintained.  Major Compliance	YES	SOU Rajawali had identified personnel responsible for handling of complaints. Records of communication were maintained at respective offices. Communication with the authority such as DOSH, DOE and Labour Department were maintained in the communication file. At the point of this assessment, there has been no request for such information by the public.
C 1.2  Management documents are publicly available,	1.2.1	Land titles/user rights	YES	The right to use the land at Rajawali CU clearly demonstrated and not disputed by any party. Documents related to land ownership i.e. land titles and payment of quit rent were made available at the respective visited offices.
except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.		Occupational health and safety plans	YES	The pollution prevention and reduction plans were made available at all the assessed operating units. The documents among others are:  (a) Pollution Prevention Plan – FY2018  (b) Identification and Management of Wastewater – FY2018.  (c) Contingency plan during water shortage – FY2018  (d) Action plan to reduce fresh water usage -FY2018  (e) Water management plan – FY2018  Note: The organization is in the interim phase of re-organizing the financial year 2017/18 to 2018. Hence there is no FY declared as 2018/19 until the full term 2018 is completed.
		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. The documents among others as listed below; Among the documents were:

Clause		Indicators	Comply Yes/No	Findings
				a) Environmental Aspect Identification (EAI) b) Environmental Impact Evaluation (EIE) registers. It was last reviewed on 19/01/2016 by respective Managers of the OU. c) Pollution Prevention Plan – FY2018. d) Identification and Management of Wastewater – FY2018. e) Contingency plan during water shortage – FY2018 f) Action plan to reduce fresh water usage -FY2018
		HCV documentation summary	YES	Documentation relating to HCV observed maintained available.
		Pollution prevention and reduction plans	YES	Pollution prevention and reduction plans continued to be made available at all assessed operating units. The documents among others are:  a) Pollution Prevention Plan – FY2018. b) Identification and Management of Wastewater – FY2018. c) Contingency plan during water shortage – FY2018 d) Action plan to reduce fresh water usage -FY2018 e) Water management plan – FY2018
		Details of complaints and grievances	YES	Management document relating to social observed maintained. However, no complaint and grievances observed.
		Negotiation procedures	YES	Management document relating to social observed maintained. However, no case of negotiation observed.
		Continual improvement plans	YES	Sime Darby Plantation Bhd continued to utilise the existing established system to regularly monitor and review their key activities at its mills and estates aimed for a better performance. The details of the CU continual improvement plans have been described in indicator 8.1. The continuous improvement plans related to operations, environment and social were established and updated respectively. In addition, the continual improvement plans were also made available at all operating units.
		Public summary of certification assessment report;		Public summary can be assessed through SIRIM QAS website.
		Human Rights Policy	YES	Policy relating human right observed maintained.
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	Policy on committing to a code of ethical conduct and integrity was observed to be maintained in the document COBC (Kod Etika Kerja). The document was available to all employees by being displayed at each office notice boards.

## 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	2.1.1	Evidence of compliance with relevant legal requirements shall be available. Major Compliance	YES	Generally, SOU Rajawali continued to comply with most of the applicable local, national and ratified international laws and regulations. Relevant licences and permits were verified at SOU Rajawali. Sampled foreign workers passports and work permits were found to be valid.
ratified international laws and regulations.	2.1.2	A documented system, which includes written information on legal requirements shall be maintained.  Minor Compliance	YES	The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them. Each estate and mill had its own Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the person in-charge and approved by the respective managers. The PSQM Department is responsible to track changes and the information was disseminated to all its plantations and Mill department.
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	YES	The CU had a documented system for identifying, updating changes to legal requirements and to monitor the status of legal compliance in their EQMS & MQMS (Estate & Mill Quality Management System) included under the Standard Operation Manual. There was evidence of compliance to legal requirements and that it had been evaluated on an annual basis. These compliances were also ensured by PSQM Internal Audits, PA visits and by RSPO Audits. Workplace inspection has been carried out by quarterly basis and has been presented during ESH meeting. Among of workplace areas has been covered such as ramp, store, engine room, workshop, etc.to prevent any all equipment was in good condition to human and environment.
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	YES	PSQM department, which is based in Kuala Lumpur, is responsible for tracking any changes to the Acts and Regulations. In addition, the CEO of Sarawak Region also played a role in disseminating new Acts & Regulations to all the mills and estates in the Region.
C 2.2 The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that	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	YES	The land belonged to Austral Enterprise Bhd. The land was bought by Golden Hope Plantation Sdn Bhd before the merge with Sime Darby in year of 2008. Original copies of Land titles were kept at SDPB headquarters while Rajawali Mill and Estates maintained photocopies of the relevant land titles.
they have legal, customary or user rights.	2.2.2	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to	YES	The CU maintained visible boundary trench and pole marking (white & red).

Clause		Indicators	Comply Yes/No	Findings
		state land, NCR land and reserves. Minor Compliance		
	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 belonged to Austral Enterprise Bhd. The land was bought by Golden Hope Plantation Sdn Bhd before the merge with Sime Darby in year of 2008. The audit team had confirmed that there were no land issues related to previous owners.
	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	No cases of land conflict were observed.
	2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties. Minor Compliance	YES	No case of conflict or dispute was observed.
	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	No case of conflict or dispute was observed.
C 2.3 Use of the land for oil palm does not diminish the legal, customary or user rights of other users	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	No customary or user rights of other users was observed.
without their free, prior, and informed consent.	2.3.2	Copies of negotiated agreements detailing the process of FPIC shall be available and shall include:	YES	No customary or user rights of other users was observed.

Clause		Indicators	Comply Yes/No	Findings
	a)	Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision-making;	YES	No customary or user rights of other users was observed.
	b)	Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken;	YES	No customary or user rights of other users was observed.
	c)	Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, incl. the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. Minor Compliance	YES	No customary or user rights of other users was observed.
	2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.  Minor Compliance	YES	No customary or user rights of other users was observed.
	2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. Major Compliance	YES	No customary or user rights of other users was observed.

## 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		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 Rajawali POM and estates continued to commit to long-term economic and financial viability. The annual budgets for 2018/19 to 2022/2023 were sighted. The budget covers activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance etc. The budget also included projections on yield/ha, and total cost of production per m ton & per ha. The mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning.
viability.	3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, shall be available. Minor Compliance		The long-range replanting programme (LRRP) until 2026/27 were sighted for both Estates. This programme was reviewed once a year and incorporated into their 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	CU Rajawali, the SOPs for each of the process had continued to be implemented. 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 followed the established SOPs.  In general, the practices in the CU had been carried out as per the Plantations / Mill Quality Management System (PQMS / MQMS) standard operating manual and procedures (SOP), Sustainable Plantation Management System (SPMS) Manual, Supply Chain Manual, ESH Management System Manual, Occupational Safety and Health Manual, Pictorial Safety Standards, Laboratory Process Control Manual and Security Guidelines. The documents include all aspects of the operation in the estates and mill, which is from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and despatch of CPO, PK and PKO as well as security of the SOU.  For the estates, on top of the PQMS, technical guidelines such as the Agricultural Reference Manual were also referred. Contents of the manual were disseminated to the workers through morning roll call and trainings. The manual is also kept in the administration office for reference. The CU also maintained existing documented Standard Operating Procedures (SOPs).
	4.1.2	A mechanism to check consistent implementation of procedures shall be in place.  Minor Compliance		For the mill, the RSPO & MSPO Internal Consultative Assessment Report has been conducted by SQM, Sarawak Region and noted on the on-going Performance monitoring.  As for the estates, there were Agronomist visits, Estate performance monitoring, Plantation advisory (PA) visit and RSPO & MSPO Internal Consultative Assessment Report which has been conducted by

Clause		Indicators	Comply Yes/No	Findings
				SQM, Sarawak Region. However, it has been noted that in Semarak Estate, a high numbers of the noxious weed Clidemia hirta and tall woody growths were observed in Fields 94SC and 95SB. Thus the Minor NCR STK 01 -2018 was issued.
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate.MinorCompliance	YES	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 monitoring and actions taken by all 4 estates were maintained and kept for a minimum of 12 months.
	4.1.4	The mill shall record the origins of all third-party sourced FFB.  Major Compliance	YES	The scope for Rajawali POM SC is Identity Preserved. Hence, 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 4 estates in Rajawali CU 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 from Sime Darby Research Sdn. Bhd. Annual fertilizer recommendations were made based on annual foliar sampling while soil sampling was carried out on a 5 year cycle basis by Sime Darby Research Sdn. Bhd.
	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	YES	Fertiliser inputs were based on recommendation made by Sime Darby Research Sdn. Bhd. The visit was carried to cover all the oil palm field and the findings were used as guidance in formulating the fertilizer input and recommendation on good agricultural practices to improve growth and subsequently the FFB yield. The application programs were monitored using program sheets, bin cards, field cost book and manuring program sheets. Records of programs and applications of fertilisers were available. Records showed that actual applied in 2017 was in line with recommendations in all estates.
	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. The annual foliar sampling were carried out in Dec 2017 for Rajawali & Samudera Estate, Feb 2018 for Semarak Estate and June 2018 for Bayu Estate. The soil sampling was carried out on a 5 year cycle basis and last carried out between 2014 – 2018.
	4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues. Minor Compliance	YES	Rajawali CU had a nutrient recycling strategy where palm fronds were properly stacked in the interrow to decompose. EFB will help to supplement the inorganic fertilizer thus improving the nutrient status of the field.

Clause		Indicators	Comply Yes/No	Findings
C 4.3 Practices minimise and control erosion	4.3.1	Maps of any fragile/marginal soils shall be available. Major Compliance	YES	Soil Maps were made available to auditors. There were no fragile/marginal soils in all estates except on Rajawali Estate as per the map provided had a small area with Gali soil series.
and degradation of 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 Rajawali CU continued to have a management strategy for planting on slopes in oreder to minimise and control erosion and degradation of soils. It was observed that practices to minimise and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crop were planted in the replants and in some mature areas. The cover crop <i>Mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>Neprolepis biserrata</i> in the inter rows were sighted during the visit.
	4.3.3	A road maintenance programme shall be in place. Minor Compliance	YES	Rajawali CU continued to maintain its road, according to the road maintenance programmes. The programs had been supported by adequate provisions in the budgets. During the field visit, it was noted road conditions was well maintained in both estates. Accessibility was made possible by regular maintenance, guided by its road maintenance programmes. For road maintenance both estates had used motor graders and tractor drawn rollers, back hoes, tractors with back buckets and excavators. For resurfacing crusher run were purchased. Surface run off water from roads is directed into fields and road side drains. De-silting of drains was carried out with excavators.
	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	At Rajawali estate, the subsidence of peat soil has been monitored by monthly basis and recorded in file "peat subsidence record" included water level table. Sighted 4 piezometer has been installed for every 5 ha.
	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	During site visit at peat area based on long range replanting program (LRRP), replanting will be conducted for next 2 years. Sighted a manual / SOP for peat area to conduct drain ability assessment such as every inter row will be installed with 'parit 4' to retain water table on the field.
	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance	YES	There were no problematic soils in all estates. Refer to soil types at 4.3.1
C 4.4 Practices maintain	4.4.1	An implemented water management plan shall be in	YES	All estates continued to be guided by the common Water Management Plan which was developed in order to maintain availability of natural water resources. The plan was update on July 2017 included

Clause		Indicators	Comply Yes/No	Findings
the quality and availability of		place. Minor Compliance		practicing efficient water consumption through various methods such as minimising wastage of treated water and pollution prevention to the natural water sources.
surface and ground water.	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	CU continues to implement their SOP and Policy on maintenance of the riparian zone. The buffers had been identified in accordance with Department Irrigation and Drainage. Interviews with the workers revealed that they understood the requirement of keeping the riparian zones free from any agricultural activities such as application of fertilizer and chemical weeding. CU had maintained the protection on water courses, including maintaining and restoring appropriate riparian buffer zones along all natural waterways within the estate.
	4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national regulation. Minor Compliance	YES	Site visit to the effluent treatment plant and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily. Rajawali POM records of water monitoring for DOE submission was available for viewing. Rajawali POM's DOE license was for water irrigation and the requirement is for the BOD to be less than 50 mg/l. The results from final discharge were compliance within parameter limit.
	4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. Minor Compliance	YES	Processing water obtained from Sungai Similajau, the use of water in the mill was monitored as followed: The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made monthly with the latest recording and noted that the average was 1.01MT water/FFB. There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc.
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest	4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. Major Compliance	YES	Rajawali CU continued to implement IPM in all estates and continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Agricultural Reference Manual. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. For bagworm control the program includes the planting of beneficial plants such as Cassia cobanensis, Antigonan leptopus and Turnera subulata and for rhinoceros beetles is by using pheromone traps. In order to minimize use of pesticides the estates had planted beneficial plants mainly Tunera subulata, Cassia cobanensis and Antigonon leptopus with maps indicating areas planted.
Management techniques.	4.5.2	Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	YES	Training related to IPM implementation as per the Agricultural Reference Manual (ARM) was conducted by Assistant Managers of all estates. IPM trainings were 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	YES	Rajawali CU continued to use agrochemicals based on its Agricultural Reference Manual (ARM) Section 15 and 16, SSOP and in the Pictorial Safety Standard Book (PSS) where written justifications had been provided for various fields operations. 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 procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs.

Clause		Indicators	Comply Yes/No	Findings
		non-target species shall be used where available. Major Compliance		
	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 estates had 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 estates in Rajawali CU were committed to minimise the usage of agrochemicals by implementing IPM. Blanket spraying was not practiced by this CU and soft grasses maintained in the field. Barn owls was encouraged, as indicated by Barn Owl census records, to reduce the use of rat baits. As part of the IPM plans, the management of all estates had established nectariferous beneficial plants (Cassia cobanensis, Antigonan leptopus, Turnera sublata, and Mucuna bracteata) nurseries for continuous planting in order to attract natural predators and thus reducing the use of insecticides. EFB applied in mature areas and in replants was applied in single layers and is not dumped in large amounts to prevent breeding of Rhinoceros Beetles. However, in replants prophylactic spraying using diluted cypermethrin for immature palms in zero burning of oil palm to oil palm replanting was carried out against Rhinoceros Beetles as per SOP.
	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 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	YES	All estates in Rajawali CU 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 Reg. 2000. From the review of the chemical register, it was noted that all pesticides used were of class ii, iii & iv. The use of paraquat had been banned in all SDPB estates. There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. From records and interviews with workers, staff and estate assistants, found that they were trained, all precautions taken and all legal requirements met.

Clause		Indicators	Comply Yes/No	Findings
		(Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). Minor Compliance		
	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 verified at time of visit at Rajawali CU estates showed that pesticides were handled, used and applied by trained persons and as per the MSDS of the pesticide. The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involve 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 training. It was also noted that MSDS are available at all sites during the audit. Training on pesticide handling and spraying technique was carried out by OSH team and by the Assistant Manager. The training included the safety aspects and usage of PPE when handling with pesticides. Record of training was available for verification.
	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 (see Criterion 5.3). 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 Regulations. Major Compliance	YES	The chemical stores in all estates were found to comply with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). Records of purchase, storage and use were maintained. All of the stores were equipped with exhaust fans and the door was secured. Only authorized personnel are allowed to handle the chemicals. All the chemicals were segregated accordingly. Empty pesticides containers were triple rinsed, holes punched in them and stored separately in the scheduled wastes store awaiting proper disposal.
	4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts.  Minor Compliance	YES	Pesticide applications were guided by the company SOP. The chemicals used in the Company's estates are the common chemicals used and established in the palm oil industry. Proper PPE and tools were provided to ensure that the application of pesticides were carried out appropriately and thus minimise risks and impact to health and safety.
	4.6.8	Pesticides shall be applied		Aerial spraying was not practiced by all four estates. There was no evidence to show that any had

Clause		Indicators	Comply Yes/No	Findings
		aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. Major Compliance	YES	been carried out. All estates only practices circle spraying and selective spraying which is only for targeted species such as woodies and VOPs.
	4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide-handling shall be demonstrated or made available. Minor Compliance	YES	The staffs and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involve and how the chemicals should be used in a safe manner. Attendance list was available for all the training 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	In Rajawali POM, procedure on Scheduled Wastes (Hazardous Waste) Management has been established. Based on Environmental Impact Evaluation and Environment Aspect and Impact Identification, improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination.
	4.6.11	Specific annual medical surveillance for pesticide operators, documented action to treat related health conditions, demonstrated.  Major Compliance	YES	All the operating units audited performed the annual medical surveillance by a common DOSH registered Doctor. In addition, there were also checks-up made on monthly basis for the chemical handlers internally by the Estate Medical Assistant. All records were sighted and verified. All the examined employees were found FIT to perform duties as declared by the Medical Officer.
	4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. Major Compliance	YES	All the estates and mill in the CU complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation whereby no work with pesticides is given to pregnant or breast-feeding women. <i>Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan)</i> . The estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.
C 4.7 An occupational health and safety	4.7.1	An occupational health and safety policy shall be in place. An occupational health and	YES	The Group Occupational Safety & Health Management Policy had been established and implemented. The policy was signed by the Managing Director of Sime Darby Plantation dated January 2015 and displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is

Clause		Indicators Comply Yes/No		Findings
plan is documented, effectively communicated and implemented. The occupational health and safety plan shall		safety plan covering all activities shall be documented & implemented, and its effectiveness monitored. Major Compliance		implemented through the OSH activities by the Regional SQM Executives and monitored by SQM 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. In interviews with the workers and staff during the site visit workshop, office compound, workshop, laboratory, engine room, boiler house) revealed that the employees had been briefed and had understood the policy.
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	Both the mill/estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following; Change in work process, Revision/changes in legislative requirement and Occurrence of accidents. HIRARC for the mill and estates was formalised on in 2008 with latest review made in Aug 2018.
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practices. Adequate and appropriate protective eq 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.	NO	Site visit to the office complex to observe the store management and the chemical mixing area evidenced that workers on duty were fully equipped with mask, rubber gloves, rubber boots & apron. However, at Rajawali Estate and Semarak Estate, some workers observed harvesting were not wearing helmets for which the Major NCR STK02 -2018 was issued. Harvesting sickles, chisels, axes and parangs were provided with covers. Trainings were provided during musters and also in session held in the estate community hall. The following trainings made for the employees were recorded as follows. Subjects extracted were mainly related to ESH, SOPs, and pesticide handlings.
	4.7.4	The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about	YES	The letter of appointment for the Managers signed by the Regional CEO was sighted. The Manager subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the estates. Similar appointment was made for all the estates and the mill. All identified Executives were officially given a letter for such an appointment. All estates and the mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. Minutes of meetings held by the mill and estates were verified. At the meetings workers participated in the discussion mainly on housing and safety. All units adopted the agenda as released

Clause		Indicators	Comply Yes/No	Findings
		health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. Major Compliance		SQM. This agenda list was sighted and adequate to discuss salient issues relating safety, environmental and health.
	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 are available in adherence to the SDPB policy on 'Crisis Management & Emergency Response' plan and "Accident and Reporting and Investigation Procedure'. There was 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 issued by SQM and amended to tailor to the situation differences in the estates and mills. ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training. The trained personnel for the First Aid were among the employees working in the mill on shift and the estates staff/mandores. The first aid boxes were available at various points in the mill complex including laboratory, office, workshop, process control room etc. Similarly, the estates distributed the first aid box to the mandores and brought along to the field during operations. In addition, there are also first aid boxes kept in the office, store and workshops.
	4.7.6	All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	YES	SOU Rajawali provides Medical care to Group Estate workers with Klinik Ladang Rajawali established within the premises and more serious cases are referred to Hospital Bintulu which is about 50 Km from the Estates and Mill.  SOU Rajawali had continued to provide a group insurance for all 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.
	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	YES	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using Lost Man day MC. This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKKP 8 a mandatory requirement for submission to DOSH by Jan of the subsequent year. Cases if any are reviewed during safety meetings. Where required submissions of JKKP 6, & 8 to DOSH were complied with under the legislative requirement. Investigations and revision of HIRARC where appropriate were made accordingly. All units submitted the JKKP 8 in Jan 18 complying with the DOSH statutory requirement.
C 4.8 All staff, workers, smallholders and contract workers are	4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and	YES	Formal training programmes 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 unit were established. A training need identification matrix has been established with target dates for the training identified.

Clause		Indicators	Comply Yes/No	Findings		
appropriately trained.		that includes regular assessments of training needs and doc. of the prog. Major Compliance				
	4.8.2	Records of training for each employee maintained. Minor Compliance	YES	Rajawali CU 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. Details of training are shown in 4.7.3 above. Records including date, subject and no of attendees for each unit are shown therein.		

# 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 and monitored, to demonstrate continual improvement.	5.1.1	An environmental impact assessment (EIA) shall be documented.  Major Compliance	YES	The EAI as detailed in the estates register covers all estates activities/operations. The latest register being reviewed in July 2018 to include the changes and continued being formalised for 2018/19. Among others the significant environmental aspects related to the estate operation including the activities from; FFB transportation to the mill, movement of vehicles/transportation of estates machines and tractors, herbicide/pesticides spraying, anti-malaria fogging, road resurfacing & grading, grass cutting /construction activities, harvesting, pest and disease, upkeep programme, nursery / replanting, water treatment plant and power station.  Similarly, the environmental aspects for the mill are tabulated in the EAI master list updated in Sept 2018. Among others the EAIs are divided into the all stations in the mill processing; the boiler stack emission, black smoke, palm oil mill effluent (POME) discharge and water contamination, activities related to managing of scheduled wastes and general waste, activities of all operations beginning from the mill entrance ending to the effluent and EFB operations. Documents are maintained, sighted and verified.
	5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change is developed & implemented within a comprehensive action plan. The action plan identify the responsible person/s. Minor Compliance	YES	There is no change in the existing practices required to mitigate negative effects based on identified impacts for both the mill and estates. The targets and program/efforts by the Mill & Estates in achieving to lower the environmental aspect/impact were provided and reviewed. Records of periodical reporting of the listed issues were available. These were the evidence which showed that the plans been monitored. The plans were reviewed annually during the Management review / ESH meeting where environmental issues were discussed.
	5.1.3	This plan shall incorporate a monitoring protocol, adaptive	YES	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

Page 33 of 74

Clause		Indicators	Comply Yes/No	Findings
		to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.  Minor Compliance		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.
C 5.2 The status of rare, threatened or endangered species other High Conservation Value	5.2.1	Information shall be collated in a HCV assessment that includes both the planted area itself relevant wider landscapelevel considerations.  Major Compliance	YES	The CU had re-assessed to collate information relating to HCV. The assessment contained information of both planted area and relevant wider landscape-level, and result HCV identified. The latest report of the assessment was provided in "High Conservation Value (HCV) Final Report (Version 2.0), June 2017". The assessment had identified the total of HCV area for CU as 275.4 ha.
habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations	5.2.2	Where RTE species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan. Major Compliance	YES	No RTE species were observed, except HCVs areas of identified rivers. Relevant action plans had been established and implemented concerning protection of the rivers, such as identification on map and ground, restriction of no chemicals activities, awareness training to workers and patrolling by Auxiliary Police.
managed to best ensure that they are maintained and/or enhanced.	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 national law if any individual working for the company is found to capture, harm, collect or kill these species. Minor Compliance	YES	Relevant programme to workers pertaining awareness of HCV areas and RTE observed conducted. Trainings were evident.

Clause		Indicators	Comply Yes/No	Findings
	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	The CU has been observed to be implementing the established action plans, including monitoring (patrolling) of the conservation areas by Auxiliary Police. Record of monitoring (patrolling) evident.
	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	No HCV set-asides with existing rights of local communities were observed.
C 5.3 Waste is reduced, recycled, re-used, and disposed of in	5.3.1	All waste products and sources of pollution shall be identified and documented.  Major Compliance	YES	All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2018/19. The compilation for Financial Year 2018/19 was made at SOU/Regional level.
an environmentally and socially responsible manner.	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	YES	Rajawali CU adopted the guidelines provided by the Agriculture Department on the empty chemicals containers management. All empty chemical containers in both estates and mill were triple rinsed, and disposed through approved licensed contractor. This DOE licensed contractor caters the collection of scheduled wastes for both mill and estates within the Sarawak Region. Sighted record of disposal made as follows by the operating units taken as sample.
	5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented Minor Compliance	YES	There are procedures and guidelines in the disposal of wastes and pollutants issued by the SDPB Head Office level to minimize pollution on the routine operation.
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 was established. It has been incorporated into the Environmental Aspect and Impact activities report for 2018/19. The document was updated on every Financial Year. Sighted monitoring of diesel consumption tabulated on monthly basis for both the estates and the mill. Ratio litres/mt FFB is calculated to analyse the usage to ensure it falls within the acceptable range.

Clause		Indicators	Comply Yes/No			Findir	ngs			
C 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the	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'03. Major Compliance	YES	The Company SDPB on the entirety SDPB had a policy of no open burning. Both estates practiced zero burning. During program of replanting all palms were felled, shredded, windrowed and left to decompose at site. This is documented in the SOP, and appeared in the Agronomist, PMU reports.						
ASEAN guidelines or other regional best practice	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'03.  Minor Compliance	YES	SDPB had a policy on no	o open buri	ning. Both estates	practiced zero bur	rning.		
C 5.6 Preamble Growers and millers commit to reporting on	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent.	YES	The gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain environmental aspects/impacts register associated with their activities. Environmental aspect impact (EAI) records which covers estate and mill activities / operation. 'Pollution Identificated Environmental Improvement Action Plan' – is used to identify the waste products and source pollution, was in place and is reviewed accordingly.						
operational greenhouse gas emissions. However, it is recognised that	5.6.2	Significant pollutants and GHG emissions shall be identified, and plans to reduce or minimise them implemented.  Major Compliance	YES	Rajawal CU had identifit tractor and gen set ope emission by daily inspect and problem that could and reported in the Palm	ration. The ction and nader adverse in	e management from management f	om both estates a farm tractor and	and mill had planne gen set to prevent	ed to reduce any leakage	
these significant emissions cannot be monitored completely or	5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and	YES	PalmGHG calculation of Summary of Net GHG E	<u>Emissions</u>	•			1	
measured		emissions from estate and mill		Emissions per Product		tCO2e/tProduct	Extraction	%		
accurately with		operations, using appropriate		СРО		1.48	OER	22.17	]	
current knowledge and methodology. It		tools. Minor Compliance		PK		1.48	KER	4.77	]	
is also recognised		willor Compliance								
that it is not always					Production	n	t/yr			
feasible or practical					FFB Proce		177948.6			
to reduce or					CPO Prod	uced	39454.49			

Clause	Indicators	Comply Yes/No		Fi	ndings		
minimise these emissions. Growers and millers commit to an impl. period until the end of Dec 2016 for promoting best practices in reporting to the RSPO, & thereafter to public reporting.			Land Use OP planted area OP planted on peat Conservation (fores Conservation (non-	sted)		Ha 9851.22 23.49 0 0 9851.22	
Growers & millers make this			Summary of Field Emissions and			<u> </u>	
commitment with the support of all				Own Crop tCO2e	tCO2e/tFFB	Group tCO2e	tCO2e/tFFB
other stakeholder			Emissions	10026	ICOZE/IFFB	10026	ICO2e/IFFB
groups of the RSPO. Plans to reduce			Land Conversion	96277.03	0.59	10220.93	0.6
pollution and emissions, incl. GHG, are developed, impl			*CO2 Emissions from Fertiliser	7507.73	0.05	473.94	0.05
and monitored.			**N2O Emissions	7460.47	0.05	630.74	0.08
			Fuel Consumption	3981.83	0.02	289.75	0.02
			Peat Oxidation	1280.38	0.01	279.98	0.26
			Sinks				
			Crop Sequestration	-88177.41	-0.54	-9552.97	-0.57
			Conservation Sequestration	0	0	0	0
			Total	28330.03	0.18	2342.37	0.44

Clause	Indicators	Comply Yes/No		Fin	dings		
			Summary of Mill Emis	sions and Credits			
					tCO2e	tCo2e/tFFB	
			En	nissions			
			PC	OME	38222.93	0.21	
			Fu	el Consumption	2235.84	0.01	
			Gr	id Electricity Utilisation	0	0	
				edits			
				port of Grid Electricity	0	0	
				lles of PKS	0	0	
				lles of EFB	0	0	
			10	tal	40458.77	0.23	
			Palm Oil Mill Effluent	(POME) Treatment			
				Divert to compost		0%	
				Divert to anaerobic dige	stion	100%	
				<u> </u>			
			POME Diverted to Ana	aerobic Digestion:			
				Divert to anaerobic pond	t	100%	
				Divert to methane captu		0%	
				Divert to methane captu (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	6.1.1	A social impact assessment incl. records of meetings shall be documented.		The CU retained its documented SIA, including records of meetings. The information of SIA contained in "Social Impact Assessment (SIA) Report, CU Rajawali, 5-9/9/16" report. The assessment covered all units in Rajawali. Attendance list identified that the assessment had been participated by various
management that		Major Compliance		stakeholders. Minutes of meetings were available.
have social impacts, including replanting, are identified in a	6.1.2	There shall be evidence that the assessment has been done with the participation of	YES	There was evidence that the assessment has been done with the participation of affected parties. Attendance list identified that the assessment had been participated by various stakeholders, e.g. workers, surrounding communities, neighboring plantations and smallholders, suppliers, contractors,

Clause		Indicators	Comply Yes/No	Findings
participatory way, and plans to mitigate		affected parties. Major Compliance		etc. Interviewed with the affected parties confirmed the assessment has been done with their participation.
the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, incl. responsibilities for impl.  Major Compliance	YES	The CU observed maintained established and implemented SIA action plan. Among of issues and action plans were: streamlined of employees' salary scheme fringe and benefit with Peninsular Malaysia, changed of electricity supply from own generation to SESCO, displayed of Hospital Assistant's duty timetable, job opportunities (harvesting, pruning, raking), construction of new toilet at Auxiliary Police Post, supplied of additional water tank for workers housing, security escort for worker to withdraw their salary in town during payday, changes of pruning system and replanting.
	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	YES	The CU noted practices to review SIA plan at least annually by each operating unit, together with their affected parties. The last review were evident. It has been carried out between Aug & Sept 2018 for the CU.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	YES	No smallholders included in the CU.
C 6.2 There are open and transparent methods	6.2.1	Consultation & communication procedures shall be documented.MajorCompliance	YES	The CU noted maintained documented consultation and communication procedures with stakeholders.
for communication and consultation between growers and/or millers, local	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	The CU had appointed an Assistant Manager at each operating unit as the management official responsible for social issues. Appointment letters at each operating unit were available.
communities and other affected or interested parties	6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that	YES	The CU continued to maintain a documented list of stakeholders. Among of stakeholders identified were surrounding communities, neighboring plantations and smallholders, suppliers, contractors, government agencies. The list also contained the relevant name of person, address and phone

Clause		Indicators	Comply Yes/No	Findings
		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		number.
C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and	6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants&whistleblowers, where requested.  Major Compliance	YES	The CU maintained a complaint, grievance and dispute system that was opened to affected parties. However, It was observed that no complaint or dispute was received from affected parties.
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	It was observed that no complaint or dispute was received from affected parties.
C 6.4 Any negotiations concerning compensation for loss of legal, customary or user	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 CU continued to maintain its procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation.
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.	6.4.2	A procedure for calculating and distributing fair compensation 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	YES	The CU continued to maintain its procedure for calculating and distributing fair compensation.

Clause		Indicators	Comply Yes/No	Findings
		and long-established comm; and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance		
	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	No case of compensation to affected parties was observed.
C 6.5 Pay and conditions for employees and for 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	NO	The CU maintained documentation of pay and conditions in pay-slips and employment contracts. However, it could not be confirmed that employee wages and overtime payments documented on the pay slips met with legal requirement. e.g.  a) Rajawali Estate: Pay for August 2018 – Employee No.: 138808, 138806. Records for confirmation of attendance and overtime yet to evidence.  b) Semarak Estate: Pay for August 2018 – Employee No.: 118863, 138674, 45017, 138268. Records of attendance at muster did not tally with computer input form to confirm attendance and overtime. And, paid overtime did not tally with calculation.  c) Bayu Estate: Employee No.: 127502, 37836, 124966. Paid overtime did not tally with calculation. Thus, Major NCR HO2 is raised.
	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	Conditions of employment were contained in employment contract. Among others, the employment contract contained details of wages, benefits, working hours, leaves, accommodation, transportation, period of notice, etc. The employment contract was available in English, Bahasa Melayu and Indonesian, which could be understood by both local and foreign workers.

Clause		Indicators	Comply Yes/No	Findings
	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	The CU continued to provide adequate housing, water and electricity, medical, welfare amenities etc., which met with applicable laws. Interviewed with workers acknowledged that there were no complaints with regards to this, and request for repair were attended accordingly.
	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	The CU continued monitor price of sundry goods at the shops in the estate. Each shop submitted their price list of goods to management, and price of goods were displayed. No complaint of exorbitant price was observed. Further, the CU also monitors and compares local sundries prices with prices at shops in town.
C 6.6 The employer respects the rights of all personnel to	6.6.1	A published statement in local languages recognising freedom of assoc shall be available. Major Compliance	YES	The CU maintained policy for recognizing freedom of association. The policy displayed at each operating unit office.
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.	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented.  Minor Compliance	YES	There was no union in the CU. However, the CU continued to practice meetings with workers to discuss their issues, through various platforms, such daily Morning Muster, annual stakeholders meeting, Workers Representative Meeting etc. Attendance and minutes of meetings with workers representative were retained and available.

Clause		Indicators	Comply Yes/No	Findings
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 CU maintained to document employee profile in database. The database contained listing of employees. Among information contained was date of birth, date joined, nationality, etc. No employee under minimum age was observed.
C 6.8 Any form of discrimination based on race, caste, national origin,	6.8.1	A publicly available equal opportunities policy incl id of relevant/affected groups in the local env. shall be documented.MajorCompliance	YES	The CU maintained policy of equal opportunities. The policy displayed at each operating unit office. No discrimination was observed
religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. Major Compliance	YES	The CU maintained adhered to its policy of equal opportunities. No discrimination was observed.
	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	YES	New general foreign workers were observed to have been employed. One of the employment requirements is that the workers must be medically fit. It was noted that the new foreign workers had been examined by independent clinic and confirmed fit to work.
C 6.9 There is no harassment or abuse in the work place, and reproductive rights	6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented & communicated to all levels of the workforce. Major Compliance	YES	The CU maintained policy concerning sexual harassment and violence. The CU also maintained to have meeting covering matter related to sexual harassment and violence. However, no case was observed.
are protected.	6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented & communicated to all levels of the workforce.  Major Compliance	YES	The CU maintained policy concerning protecting reproductive rights. The CU also maintained to have meeting covering matter related to protecting reproductive rights. However, no case was observed. Interviewed with women employees confirmed they aware of their reproductive right and confirmed no issue.
	6.9.3	A specific grievance mechanism which respects anonymity and protects	YES	The CU maintained grievance mechanism which respects anonymity and protects complainants. However, no case was observed.

Clause		Indicators	Comply Yes/No	Findings
		complainants where requested shall be established, implemented & communicated to all levels of the workforce. Minor Compliance		
C 6.10 Growers and millers deal fairly and	6.10. 1	Current and past prices paid for FFB shall be publicly available. Minor Compliance	YES	The CU continued to source FFB only from own certified supply bases. Thus, publicly available of current and past price not relevant to the CU.
transparently with smallholders and other local businesses.	6.10. 2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). Major Compliance	YES	The CU continued to source FFB only from own certified supply bases. Thus, mechanism of FFB pricing not relevant to the CU. Nevertheless, for other pricing mechanism, the CU continued to procure through quotation or tender procedure depending on input / service to procure.
	6.10. 3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. Minor Compliance	YES	Interviewed with suppliers and contractor observed they understand and satisfied with their business relationship with the CU.
	6.10. 4	Agreed payments shall be made in a timely manner. Minor Compliance	YES	Interviewed with suppliers and contractor observed they understand and satisfied with their business relationship with the CU, including their payment. No issue concerning payment was observed.
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 comm. shall be demonstrated. Minor Compliance	YES	There was no request for contribution observed from local communities. However, the CU continued to contribute to communities, such as job opportunities and donation for disaster relief fund concerning Lombok earthquake.
	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	Not applicable. No scheme smallholders included.

Clause		Indicators	Comply Yes/No	Findings
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	Observed there were no evidence of forms of forced or trafficked labour been used. Employees observed being employed and treated as per applicable legal requirements and contract of employment. Passport of foreign workers were handed-over to the CU voluntarily for safe keeping. Employees interviewed confirmed no issue of forms of forced or trafficked labour, and pertaining keeping of their (foreign workers) passport. Employees also acknowledged that they are free to request back their passport. Handed-over records to both side of parties noted available.
	6.12. 2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	YES	No contract substitution was observed. Foreign workers interviewed confirmed they had employed direct by the CU and had no other contract with other party, and treated as per contract signed with Sime Darby.
	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 CU maintained policy concerning temporary or foreign workers. Foreign workers observed being treated as accordingly as per the policy.
C 6.13 Growers and millers respect human rights	6.13. 1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations. Major Compliance	YES	The CU maintained policy to respect human right. The relevant policy noted visibly displayed at each office of operating unit.
	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	The CU continued support for education for children of foreign workers. The CU continued provides free transport for children of foreign workers for their education to centralised Community Learning Centre (CLC) in the CU.

### Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Auditors has verified through checking the <u>www.globalforestwatch.com</u>, 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 Rajawali CU. 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);	YES	The CU adopted several continuous improvement in reducing of pesticides i.e. increasing planting of beneficial plants mainly <i>Tunera subulata, Cassia cobanensis</i> and <i>Antigonon leptopus</i> and continue to monitor pest through Early Warning System. The CU also adopted planting of <i>Legominious</i> Cover Crop mainly <i>Pueraria Javanica</i> and <i>Calopogonium Mucunoides</i> at replanting area in order to minimizing circle and selective weeding. <i>Neproliphis biserata</i> was maintained and encouraged to be planted in Rajawali SOU. This can be seen in their continuous improvement plan. This was to suppress growth of noxious weeds and thus reduce the use of pesticides for selective weeding. Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced in order to encourage soft grasses in inter row and frond stacking area
	b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	YES	Environmental impact assessment, management action plans and continuous improvement plan for Rajawali SOU has been updated and monitored by management. Among the improvement actions:  (a) construction of sump at chemical and workshop to prevent ground or water contamination.  (b) collect back chemicals bags and allocate store for control of misused.  (c) use of tray for tractor parking and workshop stations to prevent ground contamination
	c)	Waste reduction (Criterion 5.3);	YES	The management of Rajawali 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.
	d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	YES	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. The management of both

Clause	Indicators		Comply Yes/No	Findings
				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.
	e)	Social impacts (Criterion 6.1);	YES	The CU continued to improve the social impacts with activities like: implementation of retention incentive for foreign workers, constructing sheltered at morning muster area, upgraded of <i>surau</i> and audio system, organized social events for worker and communities, such Workers' Day celebration together with The Best & Beautiful House Competitions.
	f)	Encourage optimising the yield of the supply base Major Compliance	YES	To optimise yields, both estates implemented best agricultural practices, inclusive of: timely and proper fertiliser application and EFB & Compost application, Improving on accessibility to maximize crop evacuation, expanding in field mechanized collection of FFB, constructing water bodies and water conservation pits to conserve moisture, reducing surface run off to prevent leaching of fertilisers and paying harvesters incentives.

# RSPO Certifications Systems for Principles & Criteria June 2017

Clause	Indic	cators	Comply Yes/No	Fi	ndings		
4.5.3 Time-bound plan	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions	YES	SOU		sian Operations is in progress to fied through Time Bound Plan a	
Note:		shall be certified within a 3-year timeframe.		No	Name of SOU	Name of Units	Time Bound Plan
Where there are isolated lapses in		Any deviations from these maximum		1	PT Sime Indo Agro	East and Sei Mawang	2019
implementation of a time-bound plan, a		periods requires approval by the RSPO Secretariat.		2	PT Ladangrumpun Suburabadi	Subur Abadi Plasma 1	2019
minor non- compliance shall be raised. Where there is evidence of				3	PT Bersama Sejahtera Sakti	KKPA BSS	2019
fundamental failure to				4	PT Bahari Gembira Ria	Plasma BGR	2020
proceed with implementation of the				5	PT Guthrie Pecconina Indonesia	Sungai Jernih Estate and GPP KKPA	2017
plan, a major non- compliance shall be				6	PT Mitra Austral Sejahtera (MAS)	MAS 1, MAS 2, MAS 3, Mas Factory	2019
raised;					(111110)	Plasma MAS	2020
, , , , , , , , , , , , , , , , , , , ,				7	PT Sandika Nata Palma	Karya Palma	2018
				PT Budidaya Agro Lestari	KKPA SNP Pelanjau, Sg. Putih and Beturus (PT BAL)	2020 2018	
				$\prod$	F i Budidaya Agio Lesiali	KKPA BAL	2020
	(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		ime bound plan set for 8 ne meframe of three years for l	w/uncertified SOUs was appropRSPO certification.	oriate and within
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be	YES	Dece		ne bound plan for 8 new/uncerd d plan was revised and endorse dn Bhd - Indonesia.	

		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);					
4.5.4 Requirements for	(a)	No replacement of primary forest or any required to maintain or enhance HCV	YES	as foll	ows:		nrough Mutuagung Assessment Report were
uncertified		accordance with RSPO P&C criterion 7.3. Any new plantings since 1 <sup>st</sup> January		No	Name of SOU	Name of Units	Replacement of primary forest or HCV area and new planting
management units:		2010 shall comply with the RSPO NPP. For each new planting development, compliance with the NPP shall be		1	PT Sime Indo Agro	East & Sei Mawang	No new planting since November 2005.
	verified by an RSPO accredited CB;			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 Bersarha 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)	MAS 1, MAS 2, MAS 3, Mas Factory & PLASMA MAS	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 submit final LUCA to RSPO Secretariat office by end Dec 2017.		
				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	Pelanjau & Sg. Putih (PT BAL)	No new planting activities.	
				Agro Lestari	Baturus (PT BAL) KKPA BAL	There was a new planting area in the estate. Need to submit NPP.  No new planting activities.	

(b)	Land conflicts, if any, are being resolved through a mutually agreed	YES	The st		fied SOUs thro	ough Mutuagung Assessment Report were
	process, such as the RSPO Complaints System or Dispute Settlement Facility, in		No	Name of SOU	Name of Units	Land conflicts
	acc. with RSPO P&C 2.2, 6.4, 7.5, 7.6;		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 Planation 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 <a href="https://www.rspo.org/members/comp">https://www.rspo.org/members/comp</a> laints/status-of-complaints/view/29	
			7	PT Sandika Nata Palma	Karya Palma & KKPA SNP	No land conflict.
			8	PT Budidaya Agro Lestari	Pelanjau, Sg. Putih, Beturus & KKPA BAL (PT BAL)	No land conflict.
(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	YES	being	resolved through	n an agreed i	here were no labour dispute that are not process for all uncertified units for all 8 ation Sdn Bhd - Indonesia as at December
(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:					
	A positive assurance statement is	YES	The st		fied SOUs thro	ough Mutuagung Assessment Report were
	made, based upon self-assessment (i.e. internal audit) by organization.		No	Name of SOU	Name of Units	Positive assurance statement and self-assessment
	This would require evidence of the self-assessment against each		1	PT Sime Indo Agro	East & Sei Mawang	Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor
requirement;		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 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.

Plasma BGR Plantation does not have management control dever the plasma scheme. I out of k Koperast Unit Desa (KUD) as seported in the undergo RSPO Certification by 2020 as reported in the timebound plant. Land Use Change Analysis has been completed for Plasma BGR.  PT Bahari Gembira Ria  4   4   4   4   4   4   4   4   4   4	•	1		1			T 5.	
plasma scheme. 1 out of 8 Koperasi Unt Desa (kUD) has been RSPO Certificat and all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Land Use Change Analysis had been completed for Plasma BGR.  Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servelt/servel.  FT Guthrie  PT Guthrie  PE Ceconina Indonesia  PE Ceconina Indonesia  PE Ceconina Indonesia  Sungal Jernih Estate and GPI KKPA were audited by Mutuagung as vertified through Recentification Audit GPI KKPA  WAS 1, MAS 1, MAS 2, MAS 3, MAS 5 elahers (MAS) Singal Jernih Estate and GPI KKPA were audited by Mutuagung as vertified through Recentification Audit GPI KKPA Singal Jernih Estate and GPI KKPA were audited by Mutuagung as vertified through Recentification Audit GPI KKPA Singal Jernih Estate and GPI KKPA were audited by Mutuagung as vertified through Recentification Audit GPI KKPA Singal Jernih Estate and GPI KKPA Singal Jernih Estate and GPI KKPA were audited by Mutuagung as vertified through Recentification Audit GPI KKPA Singal Jernih Estate and GPI KKPA were audited by Mutuagung as vertified through Recentification Audit GPI KKPA Singal Jernih Estate and GPI KKPA were audited by PSQM Indonesia.  **FT Budidaya**  **T PT Sandika**  **RAYS Palma**  **FT Budidaya**  **FT Budidaya**  **Agro Lestarih Bad Conducted on 10 Feb 2017.  **KKPA BAL**  **Internal assessment was conducted on 18 - 23 Sept. Singal Publish Singal Pu								
PT Bahari Gembira Ria  A Bahari Gembira Ria  PT Bahari Gembira Ria  A Bahari Gembira Ria  Branchi Gembira Ria  A Bahari Gembira Ria  Branchi Ria							BGK	
PT Bahari Gembira Ria  4   4   4   4   4   4   4   4   4   4								
### demoira Rid ### demoira Ri								
4						Gembira Ria		
Refer to RSPO Certificate & Report for PT BGR-Intos//rispo.secure force.com/membership/servels								
https://rspo.secure-force.com/membership/serveltyservie LERBOwnload/retURL=%2/Enembership/serveltyservie LERBOWnload/retURL=%2/Enembers					4			
RSPOCerSearch&ille=00P9000001 GivYLEAZ bittps://sposeputs/seque tips://spoceputs/seque tips://spoceputs/sequestion.com/sequest								https://rspo.secure.force.com/membership/servlet/servle
https://ispo.secure force.com/membership/ser/elv/styne/l 1.Fielovynedar/ter/URL2*/Stremembership/ser/elv/styne/l 1.Fielovynedar/ter/URL2*/Stremembership/ser/elv/styne/l 1.Fielovynedar/ter/URL2*/Stremembership/ser/elv/styne/l 1.Fielovynedar/ter/URL2*/Stremembership/ser/elv/styne/l 1.Fielovynedar/ter/URL2*/Stremembership/ser/elv/styne/l 1.Fielovynedar/ter/URL2*/Stremembership/ser/elv/styne								
### Internal assessment was conducted on 10 Feb 2017.  ### PT Sandika Nata Palma ### PT Budidaya Agro Lestari PT Budidaya Agro Lestari PT Budidaya Agro Lestari PT Budidaya Serification with the relevant NGO's will be carried out by the audit tearm.  ### PT Budidaya Verified through team through the Mutuagung Assessment Report.  ### PT Budidaya Agro Lestari PT Budidaya Negro Supply Chain Certification by 2020.  ### PT Budidaya Negro Supply Chain Certification Supply Chain Certification Supply Chain Certifica								
PT Guthrie 5 Pecconina Indonesia 8 PT Guthrie 9 Pecconina Indonesia 9 PT Mitra Austral 6 PT Sungai Jernih State and GPI KKPA were audited by Mutuagung as verified through Recertification Audit report. The assessment was conducted on 15 + 20 May 2017 What Palma 8 PT Budidaya Agro Lestari 8 PT Budidaya Agro Lestari 9 PT Budidaya Agro Lestari NGO's will be carried out by the audit tearm. 9 Desktop study e.g. web check on  PT Guthrie Sungai Jernih 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 Internal assessment was conducted on 10 Feb 2017. Internal assessment was conducted on 10								
PT Guthrie Pecconina Indonesia Sungai Jernih Estate and GPI KKPA were audited by Mutruagung as verified through Recertification Audit report. The assessment was conducted on 15 + 20 May Mas Factory, Plasma MAS  PT Mitra Austral 6 PT Sandika Sejahtera (MAS)  PT Sandika Nata Palma  PT Sandika Nata Palma  8 KKPA SNsP  PElanjau, Sungai Putih 8 Returns SNsP Agro Lestari Agro Lestari NGO's will be carried out by the audit team.  PYES  Mutuagung Lestari had conducted the consultation by 2020.  YES  Verified through RSPO website: https://wwww.rspo.org/members/status-of-								
Find the perconina Indonesia   Setata and I								
Petcotinia   GPI KKPA   2017.   2017						PT Guthrie		Sungai Jernih Estate and GPI KKPA were addited by
Max					5	Pecconina		
PT Mitra Austral 6 PT Mitra Austral 6 PT Mitra Austral 6 PT Mitra Austral 8 Pactory, Plasma MAS Factory, Plasma MAS Factory, Plasma MAS  Agro Lestari  PT Budidaya Agro Lestari  PES Mutuagung Lestari had conducted the consultation with relevant NGO's will be carried out by the audit team.  PT Budidaya Agro Lestari  PES Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report.  Verified through RSPO website: https://www.rspo.org/members/status-of-						Indonesia		
PT Mitra Austral Sejahtera (MAS)  Ractory, Plasma MAS  To PT Sandika Nata Palma  PH Sandika Nata Palma  PH Budidaya Agro Lestari  Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.  PEN Mitra Austral Sejahtera (MAS)  Ractory, Plasma MAS  Karya Palma & KKPA SNsP  Pelanjau, Sungai Putih Sungai Putih RSPO Certification System, P&C RSPO (2016) and RSPO Supply Chain Certification Standard on 17 – 22 April 2017.  KKPA BAL Smallholder project – targeted for certification by 2020.  Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report.  PT Mitra Austral Sejahtera (MAS)  Ractory, Plasma MAS  Nata Palma & KKPA SNsP  Pelanjau, Sungai Putih RSPO System, P&C RSPO (2016) and RSPO								
Sejahtera (MAS)     Ractory, Plasma MAS      PT Sandika Nata Palma      PT Budidaya Agro Lestari      Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.      Desktop study e.g. web check on      Sejahtera (MAS)      Ractory, Plasma MAS      Karya Palma SkrPa Sungai Putih & Karya Palma & KKPA SNsP      PT Budidaya Sungai Putih & Beturus (PT BAL)     RSPO Certification System, P&C RSPO (2d16) and RSPO Supply Chain Certification Standard on 17 – 22 April 2017.      KKPA BAL Smallholder project – targeted for certification by 2020.      Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report.      Verified through RSPO website: https://www.rspo.org/members/status-of-							2, MAS 3,	by PSQM Indonesia.
PT Sandika Nata Palma  PT Sandika Nata Palma  PH Budidaya Agro Lestari  PT Budidaya Agro Lestari  NGO's will be carried out by the audit tearm.  PT Sandika Nata Palma  Nata Palma  NATA Nata Palma  PH Budidaya Agro Lestari  NGO's will be carried out by the audit tearm.  PH Budidaya Agro Lestari had conducted the consultation with the relevant NGO's will be carried out by the audit tearm.  PES Nata Palma  NATA Nata Palma  NATA Nata Palma  PH Budidaya Agro Lestari NATA NATA NATA NATA NATA NATA NATA NAT								
PT Sandika Nata Palma  PT Budidaya Agro Lestari  Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.  PT Sandika KKRPA SNSP  Pelanjau, Sungai Putih & Beturus (PT BAL)  PT Budidaya Agro Lestari  NEO'S will be carried out by the audit team.  NEO'S will be carried out by the audit team.  PT Budidaya Agro Lestari had conducted the consultation with relevant NGO's will be carried out by the audit team.  NEO'S will be carried out by the audit team through RSPO website: https://www.rspo.org/members/status-of-					6	Sejantera (IVIAS)		
PT Sandika Nata Palma  PT Sandika Nata Palma  RSNP  PH Budidaya Agro Lestari  PES  Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.  PT Sandika Nata Palma  RSPO Supply Chain Certification System, P&C RSPO (2ct 16) and RSPO Supply Chain Certification Standard on 17 – 22 April 2017.  KKPA BAL  Smallholder project – targeted for certification by 2020.  Mutuagung Lestari had conducted the consultation with relevant NGO's will be carried out by the audit team.  YES  Verified through RSPO website: https://www.rspo.org/members/status-of-								
PT Sandika Nata Palma  PElanjau, Sungai Putih & Beturus (PT BAL)  Beturus (PT BAL)  Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.  PT Budidaya Agro Lestari  PElanjau, Sungai Putih & Beturus (PT BAL)  Sept Sungai Putih & Beturus (PT BAL)  RSPO Certification System, P&C RSPO (2d 16) and RSPO Supply Chain Certification Standard on 17 – 22 April 2017.  KKPA BAL Smallholder project – targeted for certification by 2020.  Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report.  Verified through RSPO website: https://www.rspo.org/members/status-of-							MAS	
PT Sandika Nata Palma  PElanjau, Sungai Putih & Beturus (PT BAL)  Beturus (PT BAL)  Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.  PT Budidaya Agro Lestari  PElanjau, Sungai Putih & Beturus (PT BAL)  Sept Sungai Putih & Beturus (PT BAL)  RSPO Certification System, P&C RSPO (2d 16) and RSPO Supply Chain Certification Standard on 17 – 22 April 2017.  KKPA BAL Smallholder project – targeted for certification by 2020.  Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report.  Verified through RSPO website: https://www.rspo.org/members/status-of-								
Palanjau, Sungai Putih & Beturus Par Budidaya Agro Lestari      Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.      Desktop study e.g. web check on      Read a Rand Agro Website: https://www.rspo.org/members/status-of-  Pelanjau, Sungai Putih & Beturus Sungai Putih & Beturus Par Budidaya Agro Lestari Par Budidaya (PT BAL) 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.  KKPA BAL Smallholder project – targeted for certification by 2020.  YES  Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report.								Internal assessment was conducted on 10 Feb 2017.
Pelanjau, Sungai Putih & Beturus RSPO Certification System, P&C RSPO (2016) and RSPO Supply Chain Certification Standard on 17 – 22 April 2017.      Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.      Desktop study e.g. web check on      PB Budidaya Agro Lestari  Pelanjau, Sungai Putih & Beturus RSPO Certification System, P&C RSPO (2016) and RSPO Supply Chain Certification Standard on 17 – 22 April 2017.  KKPA BAL Smallholder project – targeted for certification by 2020.  Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report.  YES  Verified through RSPO website: https://www.rspo.org/members/status-of-					7			
B PT Budidaya Agro Lestari      B PT Budidaya Agro Lestari      Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.      Desktop study e.g. web check on      B PT Budidaya Agro Lestari      B Beturus (PT BAL)      Sungai Putih & Beturus (PT BAL)      KKPA BAL Smallholder project – targeted for certification by 2020.      Werified through RSPO website: https://www.rspo.org/members/status-of-					'	Nata Palma	SINSP	
B PT Budidaya Agro Lestari      B PT Budidaya Agro Lestari      Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.      Desktop study e.g. web check on      B PT Budidaya Agro Lestari      B Beturus (PT BAL)      Sungai Putih & Beturus (PT BAL)      KKPA BAL Smallholder project – targeted for certification by 2020.      Werified through RSPO website: https://www.rspo.org/members/status-of-								
Beturus (PT BAL)     RSPO Certification System, P&C RSPO (2d16) and RSPO Supply Chain Certification Standard on 17 – 22 April 2017.      Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.      Desktop study e.g. web check on      PT Budidaya (PT BAL)     RSPO Certification System, P&C RSPO (2d16) and RSPO Supply Chain Certification Standard on 17 – 22 April 2017.      KKPA BAL Smallholder project – targeted for certification by 2020.      Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report.      Verified through RSPO website: <a href="https://www.rspo.org/members/status-of-">https://www.rspo.org/members/status-of-</a>								
Agro Lestari     Agro Lestari     RSPO Supply Chain Certification Standard on 17 – 22     April 2017.     KKPA BAL Smallholder project – targeted for certification by 2020.      Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.      Desktop study e.g. web check on      PES Verified through RSPO website: https://www.rspo.org/members/status-of-								2016. This PT also has conducted Stage 1 audit on
Agril 2017.      KKPA BAL Smallholder project – targeted for certification by 2020.      Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.      Desktop study e.g. web check on      Agril 2017.      KKPA BAL Smallholder project – targeted for certification by 2020.      Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report.      Verified through RSPO website: <a href="https://www.rspo.org/members/status-of-">https://www.rspo.org/members/status-of-</a>					8			RSPO Certification System, P&C RSPO (2016) and PSPO Supply Chain Cortification Standard and 17
Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.      Desktop study e.g. web check on      KKPA BAL Smallholder project – targeted for certification by 2020.  Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report.  VES Verified through RSPO website: <a href="https://www.rspo.org/members/status-of-">https://www.rspo.org/members/status-of-</a>						Agro Lestari	(I I BAL)	
<ul> <li>Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.</li> <li>Desktop study e.g. web check on</li> <li>YES Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report.</li> <li>Verified through RSPO website: <a href="https://www.rspo.org/members/status-of-">https://www.rspo.org/members/status-of-</a></li> </ul>							KKDV BVI	
verified by audit team through the Mutuagung Assessment Report.  NGO's will be carried out by the audit team.  Desktop study e.g. web check on  YES  Verified by audit team through the Mutuagung Assessment Report.  Verified by audit team through the Mutuagung Assessment Report.  Verified by audit team through the Mutuagung Assessment Report.  Verified by audit team through the Mutuagung Assessment Report.				VEC	NA. store			
NGO's will be carried out by the audit team.  • Desktop study e.g. web check on  YES  Verified through RSPO website: https://www.rspo.org/members/status-of-				1ES				
team.  Desktop study e.g. web check on YES Verified through RSPO website: <a href="https://www.rspo.org/members/status-of-">https://www.rspo.org/members/status-of-</a>					verifie	ed by addit team th	irough the Mut	uagung Assessment Report.
Desktop study e.g. web check on  YES  Verified through RSPO website: <a href="https://www.rspo.org/members/status-of-">https://www.rspo.org/members/status-of-</a>			•					
Dosktop study c.g. web shock on			team.					
			Desktop study e.g. web check on	YES			://www.rspo.org/members/status-of-	
			relevant complaints		comp	laints/		

	If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any noncompliance 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.
4.6.4  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.	No additional indicators	YES	As it has been mentioned in 2.2.1 of this checklist, Derawan CU land was owned by Derawan Sendirian Berhad and Sahua Enterprise Sdn Bhd. They bought the land from Sarawak Government in April 1988. Derawan Sendirian Berhad and Sahua Enterprise Sdn Bhd are owned by Golden Hope and after merged with Sime Darby in 2007, the Land Title was transferred under the name of Sime Darby Plantation Bhd. Based on the 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 Derawan CU.

Note: 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; 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.

#### Attachment 4

### **Details of Non-conformities and Corrective Actions Taken**

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
Indicator 4.1.2	Minor	#NCR No: STK 01 2018  Requirement: A mechanism to check consistent implementation of procedures shall be in place Finding: 1. A mechanism to check consistent implementation of weed control as per Section 16 of Agricultural Reference Manual was not demonstrated.	Corrective Action:  Management would carry out Field upkeep in both the fields and would a plan for regular upkeep.	Auditor Verification:  Plan for regular up keep has been received and will be followed up in the next audit.  Status: Open
Indicator 4.7.3	Major #NCR No : STK 02 2018  Requirement: All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). 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 Finding: 1. Not all appropriate protective equipment was used by workers at the place of work.  Objective evidence:  1. Rajawali Estate and Semarak Estate: Some workers observed harvesting were not wearing helmets.		Corrective Action:  Harvesters concerned will be issued warning letters.  Harvesters would be retained on use of PPE.	Auditor Verification:  Evidence of Refresher Training for harvesters conducted by the Estate Assistant Managers on 21.09.2018 on Rajawali Estate and on 25.09.2018 on Semerak Estate has been received. The training covered the use of various type of PPE and the importance in using them.  Attendance lists, photographs and copies of warming letters issued to the concerned harvesters dated 20.09.2018 has been verified.  Status: Closed
Indicator 6.5.1	Major	#NCR No: HO 2  Requirement: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages. Finding:	1. To conduct briefing by HR personnel on the standarization of over time worked to the management teams.  2. To show evidence of payment	Auditor Verification:  1. Briefing by HR personnel on the standarization of over time worked to the management teams has been conducted on 8/10/18.

There were pay to employees for wages and overtime payment documented on pay slips could not be confirmed met legal Objective evidence:  There were pay of employee wages and overtime payment documented on the pay slips could not be confirmed met legal requirement. E.g.:  a) Rajawali Estate: Pay for August 2018 – Employee No. 138808, 138806. Records for confirmation of attendance and overtime yet to evidence.  b) Semarak Estate: Pay for August 2018 – Employee No. 118863, 138674, 45017, 138268. Records of attendance during muster not tally with input form to confirm attendance and overtime. And, paid overtime not tally with calculation.  c) Bayu Estate: Employee No.: 127502, 37836, 124966. Paid overtime not tally with calculation.	approved paid over time.	Evidence of correct payment for the workers on approved paid over time on October 2018 presented.      Status: Closed
--	--------------------------	---

Attachment 5

# **RSPO SUPPLY CHAIN: AUDIT CHECKLIST**

#### **SECTION A: GENERAL INFORMATION**

1.	File Reference No.	:	ES10171014
2.	Name of facility/ site(s) /entity(ies)	:	Sime Darby Plantation Berhad – CU Rajawali
3.	Site Location (single site/multisite/Group)	:	KM 52, Jalan Bintulu/ Miri, P.O Box 2324, 97011 Bintulu, Sarawak
4.	SC model	:	Identity Preserved (IP)
5.	Type of entity	:	CPO Mill
6.	RSPO Member Number	:	1-0008-04-000-00
7.	Annual summary records of certified oil palm products purchased and	:	Refer Table 4 of this report
	claimed		

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

	Requirements	Remarks
	Audit Process Requirements – FOR STAGE 2 / RECERTIFIC	ATION 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.	Not Applicable
	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 intent and requirements of the RSPO Supply Chain Certification Standard. 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.	The organizational systems, the management systems and the operational systems, including any documented policies and procedures of RPOM are sufficient and adequate in complying with latest revision of RSPO Supply Chain Certification Standard.

Page 56 of 74

#### SECTION B: GENERAL CHAIN OF CUSTODY REQUIREMENTS FOR THE SUPPLY CHAIN

	Requirements	Remarks
1	Applicability of the general chain of custody requirements	
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.	Rajawali POM (hereafter refer as RPOM) takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at following location – KM 52, Jalan Bintulu/ Miri, P.O Box 2324, 97011 Bintulu, Sarawak
1.2	Traders and distributors require a licence 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
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	Registration by Rajawali Oil Mill – Sime Darby.
1.4	Processing aids do not need to be included within an organization's scope of certification.	Not Applicable
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.	RPOM obtained certified FFB from own certified supply base (as listed below). RPOM also found to be aware of the downgrading procedure. List of certified supply base; Rajawali Estate, Samudera Estate, Semarak Estate & Bayu Estate.
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	RPOM only apply model D - CPO Mills: Identity Preserved
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:	-
a)	Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	Refer to Standard Operating Procedure (SOP) for Sustainable Supply Chain & Traceability under the Sustainable Plantation Management System.
b)	Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	Among record sighted are as followed and found that they were in compliance with the standard requirements; FFB delivery/ consignment note, WB advice ticket, FFB grading, Daily FFB received, Daily FFB, CPO & PK production, Daily production report and Mass Balancing records.
c)	Identification of the role of the person having overall responsibility for and authority over the implementation of	Based on appointment letter (renew) dated September 2018, the Assistant Engineer was appointed as Person-in–charge of Environmental/ Quality Management System (including RSPO)

	these requirements and compliance with all applicable	on site, assisted by weighbridge Operators and other defined critical control point (CCP)
1	requirements. This person shall be able to demonstrate awareness of the organization's procedures for the	personnel (i.e. auxiliary police, FFB grader (ramp), QA, lab and production personnel).
	implementation of this standard.	
3.2	The site shall have a written procedure to conduct annual	Audit report has also been established. The audit was conducted against the RSPO Supply Chain
3.2	internal audit to determine whether the organization;	Certification Standard Revision 2017 requirements.
	i. Conforms to the requirements in the RSPO Supply Chain	Coverage of audit sufficient & comprehensive to cater for the new standard (including modular
	Certification Standard and the RSPO Market	requirement – Module D CPO Mills: IP). Internal audit conducted on 8 <sup>th</sup> June 2018.
	Communications and Claims Documents.	Toquiromone Modulo B of O Millio. If J. Milomal addit conducted on O Garlo 2010.
	ii. Effectively implements and maintains the standard	
	requirements within its organization.	
	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.	
4	Purchasing and goods in	
4.1	The receiving site shall ensure that purchases of RSPO	
	certified oil palm products are in compliance and following	Evident. Requirement has been complied with.
	minimum information for RSPO certified products is made	
	available by the supplier in document form:	
	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);	
1	The quantity of the products delivered;	
	Any related transport documentation;	
1	Supply Chain certificate number of the seller;	
1	A unique identification number.  Information about the appropriate and the approp	
1	Information shall be complete and can be presented either on	
1	a single document or across a range of documents issued for	
1	RSPO certified oil palm products (for example, delivery notes,	
	shipping documents and specification documentation).  The site shall have documentation that demonstrate that	To demonstrate that purchases are made to the material category agreed with their supplier,
a)	The site shall have documentation that demonstrate that	r no demonstrate that burchases are made to the material category adreed with their subblier.
1		
	purchases are made to the material category agreed with their supplier (IP, SG or MB).	RPOM ensure consignment note from supplying estates being marked / stamped accordingly to indicate the RSPO certified status.

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, RPOM update their stock in Palm Trace (done by GTM).
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 announcements.	Internal supplier under same certification – valid certificate.
4.2	The site shall have a mechanism in place for handling non- conforming material and/or documents.	No non-conforming material and/or documents 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.  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).	RPOM outsource transportation of certified product to end buyer.  Agreement available and supplemented with Letter of Award to the third-party service provider.
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	Under para 3 of the agreement – Sustainability & Traceability of Product detail of the requirement as listed by the standard.

	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.	
5.3	The site shall record the names and contact details of all contractors used for the processing or production of RSPO certified materials.	Not Applicable
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.	Not Applicable
6	Sales and goods out	
6.1	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):  • 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.	The requirement of sales & goods out especially on notation of SC model applied & SC cert no complied by indicating in weighbridge dispatch ticket.
7	Registration of transactions	
7.1	<ul> <li>Supply chain actors who:</li> <li>are supply chain actors between the mill and final refinery;</li> <li>take legal ownership and physically handle RSPO Certified Sustainable oil palm products; and</li> <li>are part of the supply chain of RSPO Certified Sustainable oil palm products</li> <li>must register their transaction in the RSPO IT platform at</li> </ul>	GTM personnel updated the RSPO IT platform system upon confirmed contract, normally completed via the system within 3-month period after shipment or within the duration agreed by Mill's respective customer/ buyer.  GTM updated the system based on input provided by RPOM (e.g of input Projected & Actual FFB Processed template, Mass Balancing Records for Oil Mills (3 monthly), daily production summary report, monthly production summary report etc.)

	the time of physical shipment as required by the rules set by RSPO.	
8	Training	
8.1	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.	Training Matrix FY 2018/ 2019 established & being reviewed accordingly by the Mill Management. The training record was well maintained.
8.2	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.  Training shall be specific and relevant to the task(s) performed.	Last training conducted in May 2018 by the Assistant Manager SQM (Sarawak Region). Training focus on relevant IP procedures and record. Training material was found to be adequate in addressing the standard requirements.
9	Record keeping	
9.1	The site shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	The relevant record pertaining to RSPO SCCS within RPOM found to be updated accordingly and easily accessible during the audit.
9.2	Retention times for all records and reports shall be a minimum of two (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 pertaining to implementation of RSPO SCCS within RPOM retained for more than 2 years (10 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	
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).	RPOM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) & Kernel Extraction Rate (KER).
10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	These figures were monitored on daily & monthly basis by the mill using the prepared template to ensure their accuracy as well as monitoring of their ongoing performance.

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.	correctly indicated in the relevant outgoing paperwork.		
12	Complaints	The Owines not used Not O corporate logo as well as trademark logo.		
12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	No complaint from stakeholder with regards to RSPO SCCS since last audit.		
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.	Management review planned once annually. Last conducted in August 2018		
13.2	The input to management review shall include information on:  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	Management review report had been established. Coverage of review meeting found sufficient, among item discussed during audit; - follow up actions from earlier management review - sustainability & adequacy of all SOP's - sustainable agriculture policy - result of internal audit - change in legal requirement of any compliance - compliant (internal & external) - accident & injury (LTA) - environmental quality - waste management - energy usage performance - status of corrective actions - recommendation for improvement		
13.3	The output from the management review shall include any decisions and actions related to:  • Improvement of the effectiveness of the management system and its processes • Resource needs	The output from the management review included decisions and actions related to the following:  • Improvement of the effectiveness of the management system and its processes  • Resource needs		

# SECTION C : SUPPY CHAIN MODELS (to only use whichever is applicable)

	Module D - CPO Mills: Identity Preserved					
D.1	Definition	Actual (Oct 2017 – Sept 2018)				
	A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C). Certification for CPO	a) FFB Received RSPO	159,756.85	<u>MT</u> 159,756.85		
	mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is	Non-RSPO FFB Processed RSPO Non-RSPO CPO Production PK Production	159,756.85 0 34,554.19 7,609.22	159,756.85		
	applicable.  To verify:	b) Delivery of CPO RSPO (IP) Non-RSPO	33,579.14 0	33,579.14		
D.1.1	<ul><li>a) the volume of certified and uncertified FFB entering the mill</li><li>b) the volume sales of RSPO certified</li></ul>	Delivery of PK RSPO (IP) Non-RSPO	7550.69 0	7550.69		
	The claim only the volume of oil palm products produced from processing of the certified FFB as MB					
D 2 D.2.1	Explanation Estimate total tonnage of CPO and PK potentially produce in a	Projection (Oct 2018 –	Sept 2019)			
	year	(1) FFB Received RSPO Non-RSPO	149,129.74 0	<u>MT</u> 149,129.74		
		(2) FFB Processed RSPO Non-RSPO	149,129.74 0	149,129.74		
		(3) CPO Production		33,554.19		
		(4) PK Production		7,158.23		
D. 2 D 2.2	Explanation  The mill must also meet all registration and reporting requirements	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information were:				

	for the appropriate supply chain through the RSPO supply chain	Name: Rajawali Oil Mill – Sime Darby.
	managing organization (RSPO IT platform or book and claim).	Country: Malaysia.
		Member Category: Oil Mil.
		Products: CPO & Palm Kernel
		Program: IP
D.3	Documented procedures	
D.3.1	The site shall have written procedures and/or work instructions to	The procedures were kept in file RSPO Supply Chain Manual.
	ensure the implementation of all the elements specified in these	
	requirements. This shall include at minimum the following:	The Assistant Engineer remained as the person with overall responsibility for and authority
	a) Complete and up to date procedures covering the	over the implementation of the supply chain requirements.
	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.	
D.3.2	The site shall have documented procedures for receiving and	Standard Operating Procedure (SOP) for Sustainable Supply Chain & Traceability has
	processing certified and non-certified FFBs.	described how RPOM manages the FFB from certified source. It was confirmed that no non-
		certified FFB was received by RPOM.
D.4	Purchasing and goods in	,
D.4.1	The site shall verify and document the tonnage and sources of	RPOM will only accept the RSPO certified FFB which are from Sime Darby's own estates i.e.
	certified and the tonnage of non-certified FFBs received.	Semarak Estate, Samudera Estate, Rajawali Estate and Bayu Estate. Monitoring records
		titled as "Mass Balancing Records for Oil Mills" has recorded the tonnage of certified FFB
		and its supplying estate.
		Verified through RPOM weighing system called 'SimeWeigh' and random sample of
		weighbridge ticket from Bayu Estate, Rajawali Estate, Samudera Estate and Semarak
		Estate. Refer para 4 of this checklist under SC scope.
D.4.2	The site shall inform the CB immediately if there is a projected	There was no overproduction of certified CSPO during the period under review.
	overproduction of certified tonnage.	
D.5	Record keeping	
D.5.1	The site shall record and balance all receipts of RSPO certified	RPOM has maintained the three-monthly accounting system to record RSPO certified FFB
	FFB and deliveries of RSPO certified CPO and PK on a real-time	and deliveries of RSPO certified CPO and PK. Record titled as "Mass Balancing Records for
	basis.	Oil Mills Year 2017 and Year 2018".
D.6	Processing	
D.6.1	The site shall assure and verify through documented procedures	Global Trading & Marketing (GTM) Bintulu office informed RPOM by e-mail on the dispatch
	and record keeping that the RSPO certified oil palm product is	of RSPO certified CPO/ PK to relevant buyer (i.e. Sime Darby Austral Sdn Bhd/ Bintulu
	kept segregated from non-certified oil palm product including	Edible Oils Sdn Bhd). The dispatch of the RSPO certified CPO/ PK to buyer by RPOM were
	during transport and storage.	made based on a specific contract. The receiving pit, pipelines and tanks in RPOM were
	daming transport and otorago.	thoroughly cleaned, swept and flushed before RSPO certified CPO was pumped in to avoid
		contamination. Dedicated tanks were used to store RSPO certified CPO from RPOM.
		contamination. Dedicated tanks were used to store its of certified of O Holli KFOW.

	For traceability of a specific batch of RSPO certified CPO back to the supplying POM, RPOM kept the relevant documents such as the weighbridge ticket, CPO dispatch note, Dispatch oil quality ticket, Authorization from transporter, Borang MPOB L3, CPO dispatch authorization issued by the POM.
The objective is for 100 % segregated material to be reached.	RPOM does not accept any non-certified FFB. It was confirmed through summary of weighbridge ticket and interview with weighbridge operator. Therefore, CPO and PK can be considered 100% segregated.

### Attachment 6

### VERIFICATION OF NON-CONFORMITIES DURING PREVIOUS ASSESSMENT AT RAJAWALI CU

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
2.1.1 NCR MZK 02 2017	Major	Requirements: Evidence of compliance with relevant legal requirements shall be available.  Findings: There was non-compliance against industry code of practice for working in a confined space area 2010. No health surveillance has been done for entrance confined space (2 years once) as per industry code.	Currently Rajawali POM have carried out Medical Surveillance for Workshop, Boiler, Store, WTP, ETP and Lab personnel.  It was found that Health Surveillance for confine space not carried out due to lack of knowledge regarding Industry Code of Practice for Working in a Confined Space Area, 2010. Rajawali Mill management already sent personnel to do Health Surveillance for confine space on 10th October 2017.	Medical surveillance for the purpose of permission to work in confined space has been carried out by Dr. Wong Sung Ging (JKKP registration no: HQ/08/DOC/00/237) from Klinik Bintulu on 14/11/2017 for 11 workers / staff. Thus, previous NCR was satisfactory closed.
2.1.3 NCR MZK 03 2017	Minor	Requirements: A mechanism for ensuring compliance shall be implemented. Findings: Buring site visit it was found that trap at the monsoon drain was not function and broken. Evidence of mineral oil flowing to the drain. Water sampling also was not carried out at final discharge monsoon drain.	Rajawali mill already install plate to block oil flowing out to monsoon drain. Mill also activate oil trap in production line to trap any oil from discharge into main monsoon drain and also will send drain sample to ESI for monitored of discharged.	During site visit, sighted oil trap and bund was established near the monsoon drain was functional and mange properly by CU to prevent leachate from sludge oil to entering to monsoon drain  Status: closed
4.4.2 NCR RAR 02 2017	Major	Requirement: Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. Finding: During site visit at Bayu Estate infringement of buffer zone was sighted at Sungai Perihas Reserve near the nursery area.	Estate already marked and planted grass at the buffer zone area. In the future, it will be patrolling recorded and briefing to contractors regarding buffer zone.	A visit to the buffer area confirmed that the area had been marked and pegged and was with natural grasses. The polybags had been transferred.  Status Closed.

4.6.10	Minor	Requirement:	To give awareness training to all	Visit at contractor workshop
NCR RAR 01	IVIIIIOI	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated Finding:  -At Bayu and Rajawali Estate - housekeeping (bottle, lubricant drums, and iron) at contractor workshop and contractor parking area was very poor.  -At Bayu Estate – clinical waste items were disposed only once per year (26/5/2017, 18/5/2016, 20/1/2015, and 18/3/2014).	drivers and contractors regarding housekeeping of contractor parking area.  2. To ensure all machine provided with oil tray,  3. To brief and ensure all schedule waste item i.e. used filter, used oil, and others to be keep at schedule waste.  4. Regularly monitoring and checking by Medical Assistant and Assistant Manager In-Charge.  5. Training to Hospital Assistant (HA) and ensure he sent the clinical waste in 180 days. For the next planning, centralize clinical waste at Rajawali Estate Clinic.	confirmed that all items such as scheduled waste had been stored properly and clinical waste was being monitored by assistant manager.  Status: closed
RSPO Cert. System Document (2007) NCR MZK 01 2017	Major	Requirement:  (i) positive assurance statement, which is based upon self-assessment (i.e. internal audit) by the organization. This would require evidence of the self-assessment against each requirement.  Finding: There was only progress report to RSPO on complaint filed against PT Mitra Sejahtera (PT Mas) dated 8 September 2017, but no reports to show compliance for another requirement.	Internal assessment to review the certification system requirement has been carried out on 9-10/11/2017. With regards to the land dispute issue, the RSPO Secretariat has been well informed on the progress through regular briefing and progress reports. The latest meeting with the RSPO Secretariat was held on 8/9/2016. As of to-date, nine progress reports were provided to RSPO, with the most recent report was submitted on 30th June 2016. Further information can be obtained from <a href="http://www.rspo.org/members/complaints/status-of-complaints/view/29">http://www.rspo.org/members/complaints/status-of-complaints/view/29</a>	Internal assessment has been carried out on 9-10/11/2017 by PT Mas. SDP PT Mitral Austral Sejahtera was already ISPO certified by MUTU Certification International on 30/11/2017. It was concluded that there was no issue on HCV, legal noncompliance and labour disputes, for all uncertified units. With regards to the land disputes, the action to address the issues were on-going. Engagement between SDP and the two relevant communities and stakeholders were evident. Communication between SDP and RSPO EB was also reviewed and it can be confirmed that the process to remediation unresolved issues were in progress. Status: closed

#### 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	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).  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.  Note: Time-bound plan to achieve 100% RSPO certification has shifted to 2015.	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)
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)

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

Status	Malaysia	Indonesia	Liberia	Total	Remarks
RSPO Certified	33	23	0	56	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.  *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. Indonesia  *Effectively 23 Mills  *Note: Angsana Mini POM closed down in 2016. Selabak POM is being mothballed.
Planned for Certification/Under going Stage 1 or Stage 2 Assessment/ RSPO EB Review	0	1	1	2	SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.  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.  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.  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.  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.
Total SOUs	33	24	1	58	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.

### SDP - RSPO Certification Status for Malaysia Operations

001			D-1f	Ford Data of		
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 comissioned 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 commisioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.

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 26	Segaliud Sandakan Bay	Sandakan, Sabah Sandakan, Sabah	20 May '10 1 Oct '08	19-May-15 30-Sep-18	RSPO 547123 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

#### 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	

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 13	PT LAGUNA MANDIRI	RANTAU BETUNG	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11 1-April-14	05-Feb-22 1-April-19	MUTU-RSPO/009 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 19	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU MANDAH	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16 1 April 2014	30-Nov-21 1 April 2019	MUTU-RSPO/008 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	

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	
	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