

#### SIRIM QAS INTERNATIONAL SDN. BHD.

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

File Ref.: ES10170019

#### RSPO PUBLIC SUMMARY REPORT

CLIENT

: SIME DARBY PLANTATION BHD - SOU 31 LAVANG SOU 34 PEKAKA

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 and Supply	GPS I	_ocation	Location
Unit	Base	Latitude	Longitude	Location
	Lavang POM	N 3º 25' 58.6"	E 113º 36' 0.3"	97008 Bintulu, Sarawak
	Lavang	N 3º 13' 13"	E 113º 21' 11"	97008 Bintulu, Sarawak
	Lavang Special	N 3º 33' 16"	E 113º 37' 15"	97008 Bintulu, Sarawak
COLLSS Lavana	Belian	N 3º 31' 37"	E 113° 38' 31"	97008 Bintulu, Sarawak
SOU 33 Lavang Pekaka	Rasan	N 3º 15' 34"	E 113º 21' 37"	97008 Bintulu, Sarawak
Certification	Kelida	N 3º 32' 19"	E 113º 40' 51"	97008 Bintulu, Sarawak
Unit	Pekaka	N 3º 36' 03"	E 113º 38' 41"	97008 Bintulu, Sarawak
J Time	Ruai	N 3º 26' 45"	E 113º 39' 03"	97008 Bintulu, Sarawak
	Dulang	N 3º 35' 23"	E 113º 43' 11"	97008 Bintulu, Sarawak
	Paroh	N 3º 35' 23	E 113º 42' 25"	97008 Bintulu, Sarawak
	Chartquest	N 3º 37' 24"	E 113º 37' 11"	97008 Bintulu, Sarawak

MAP: See Attachment 1 AUDIT DATE : 29 Oct - 2 Nov 2018 **DURATION** : 25 auditor days **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 Mass Balance 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 Name Mohd Zulfakar Kamaruzaman Name THE DARBY PLANTATION (SARAWAK) SDN BHD (Company b Signature Signature SALWA MD Assistant Manager S Date 11/2/2019 Date Sarawak Region

## **SUMMARY OF AUDITS**

Recertification audit						
On-site audit date	:			No. of auditor days :		
Audit team	:			<b>'</b>		
No. of major NCR	:	Indicate	or:		Closing date :	
No. of minor NCR	:	Indicate	or:			
Indicate the	:	Employees	Settlers	Villagers	Suppliers	
stakeholders						
interviewed during the		Contract workers	NGOs	Govt. agency	Independent growers	
on-site audit						
		Indigenous peopl	e Contractor	Others (Please specify	)	
Supply base sampled	:	Lavang Special E	state, Rasan Esta	ite & Belian Estate		

Г						
		A	Annual	Surveillance A	udit 1	
On-site audit date	:				No. of auditor day	/S:
Audit team	:				<u>-</u> -	-
No. of major NCR	:	Inc	dicator:			Closing date :
No. of minor NCR	:	Inc	dicator	:		
Indicate by ticking the	:	Employees		Settlers	Villagers	Suppliers
stakeholders interviewed						
during the on-site audit		Contract worl	kers	NGOs	Govt. agency	Independent growers
		Indigenous p	eople	Contractor	Others (Please s	pecify)
Supply base sampled	:	Lavang Estat	te, Keli	da Estate & Dula	ang Estate	
Changes since the last	:					
audit						
Report approved by	:				Approval date :	

Annual Surveillance Audit 2						
On-site audit date	:	29 Octob		ember 2018	No. of auditor days :	25.0 auditor day
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Rozaimee Ab Rahman, Amir Bahari, Selvasingam T. Kandiah and Hazani Othman				
No. of major NCR	:	3	3 Indicator : 1.1.2, 4.3.4, 6.5.1			Closing date : 1/2/2019
No. of minor NCR	:	1	Indicator	: 4.6.7		
Indicate by ticking the : stakeholders		Employe	es	Settlers	Villagers / Local communities	Suppliers
interviewed during the		1	1		V	$\sqrt{}$
on-site audit		Contract workers		NGOs	Govt. agency	Independent growers
		1	$\downarrow$			
		Indigenous people		Contractor	Others (Please specify)	
		N	A	V		
Supply base sampled	:	Pekaka E	state, Lav	ang Special Estate	e, Paroh Estate, Ruai E	state.
Changes since the last audit	:	No chang	jes			
Justification of audit planning	:	Mill = 5 verification There was	days (4 on and Social (4)	day for safety an cial at Mill) + (1 day estates audited na	/ for supply chain certific mely Pekaka Estate, La	, mill best practices, GHG

	Certification and GHG verification plu Thus 4 estates is equivalent to 4 x 5 r	ure best practices, Social, HCV, TBP, Partial is the verification of Land History and Land Title. man-day = 20 man-day. The total for the entire CU in the no of auditors and their respective days for
Report approved by :	Radziah Mohd. Daud	Approval date: 11/2/2019

			Δnnu	al Surveillance A	udit 3	
On-site audit date	:		Ailliu	ai oui veiliance A	No. of auditor days :	
Audit team	:				,	
No. of major NCR	:		Indicator	:		Closing date :
No. of minor NCR	:		Indicator	:		
stakeholders		Employee	es	Settlers	Villagers / Local communities	Suppliers
interviewed during the						
on-site audit		Contract	workers	NGOs	Govt. agency	Independent growers
		Indigenous people		Contractor	Others (Please specify)	
Supply base sampled						
Changes since the last audit	:					
Justification of audit planning	:					
Report approved by	:				Approval date :	

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

## **SUMMARY OF INFORMATION**

## TABLE 1

	October 2017- September 2018 331,316.00	October 2018 – September 2019 283,130.14					
	September 2018	September 2019					
		·					
	331,316.00	283,130.14					
	67,920.00	59,429.02					
	18,222.00	13,675.19					
-	23,595.16	**23,642.81					
-	20,839.17	**20,984.45					
-	20,839.17	15,149.51					
-	353.63	*354.07					
ASA 2:  *The HCV has been based on the latest HCV Assessment Report, 2017.  **It was verified that the information provided to CB on the Certified Area and Conservation set aside at SOU 31 Lavang, SOU 34 Pekaka was not accurate since 2012 (refer to PT Mutuagung Lestari report in 2017). The values were not consistent with that stated in the Land Title, HCV Assessment and SAP System (Internal control Sime Darby). The correct information has been verified to be as below:    Estate							
	- A 2: ue HCV has bee was verified the at SOU 3' tuagung Lestare, HCV Assess been verified to state Are in h I Estate Are in h I Estate 1,00	- 23,595.16  - 20,839.17  - 20,839.17  - 353.63  A 2: Be HCV has been based on the late was verified that the information reduced at SOU 31 Lavang, SOU 31 tuagung Lestari report in 2017). Te, HCV Assessment and SAP System in the state of the second second in ha lestate of the second secon	- 23,595.16 **23,642.81  - 20,839.17 **20,984.45  - 20,839.17 15,149.51  - 353.63 *354.07  A 2: Be HCV has been based on the latest HCV Assessment was verified that the information provided to CB on the deat SOU 31 Lavang, SOU 34 Pekaka was not attuagung Lestari report in 2017). The values were not compared to be as below:  Be HCV Assessment and SAP System (Internal control is been verified to be as below:  Be HCV Assessment and SAP System (Internal control is been verified to be as below:  Be HCV Assessment and SAP System (Internal control in ha)  Be Bestate Area (Since 2016) Land Title as Per Legistate 23,595.16 23,642.81  SA Area Area (Since 2016) CSA Area as per Hireport and SAP System (Internal SAP System)  Be Bestate 1,093.72 142.41	- 23,595.16 **23,642.81  - 20,839.17 **20,984.45  - 20,839.17 15,149.51  - 353.63 *354.07  A 2:  The HCV has been based on the latest HCV Assessment Report, 2017.  Was verified that the information provided to CB on the Certified Area at the latest at SOU 31 Lavang, SOU 34 Pekaka was not accurate since transpuring Lestari report in 2017). The values were not consistent with that the provided to be as below:  The state Area (Since 2016) Land Title as Per Legal Grant in ha  I Estate 23,595.16 23,642.81  SA Area Area (Since 2016) CSA Area as per HCV Assessment report and SAP System  I Estate 1,093.72 142.41  The more details, refer to Major NCR MZK 01 2018 which has been rais			

## TABLE 2

	РО	PK
Last years certified volume (MT)	67,920.00	18,222.00
Last years actual certified sold (MT)	5,600.00	4,800.00
Last years actual sold under other schemes (MT)	0	0
Last years sold conventional (MT)	52,664.37	9,940.23
New year certified volume (MT)	59,429.02	13,675.19

Tabl	e of contents	Page
1.0	AUDIT PROCESS	7
	1.1 Certification body	7
	1.2 Qualification of audit team	7
	1.3 Audit methodology	7
	1.4 Stakeholder Consultation	7
	1.5 Audit plan	7
	1.6 Date of next audit	7
2.0	SCOPE OF CERTIFICATION AUDIT	8
	2.1 Description of the certification unit	8
	2.2 Description of the Supply Base (including planting profile)	8
	2.3 Organization Information / Contact Person(s)	13
3.0	AUDIT FINDINGS	13
	3.1 Changes to certified products in accordance to the production of the previous year	13
	3.2 Time bound plans including changes and reasons for the changes see below	13
	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)	- 14
	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.	
	3.5 Any new acquisition which has replaced primary forests or HCV areas	14
	3.6 Other changes (e.g. organizational structure, new contact person, addresses, etc.)	14
	3.7 Status of previous non-conformities * (refer to Attachment 6)	14
	3.8 Complaint received from stakeholder (if any)	14
4.0	DETAILS OF NON-CONFORMITY REPORT	14
	4.1 For P&C (Details checklist refer to Attachment 3)	14
	4.2 For SC (Details checklist refer to Attachment 5)	14
5.0	AUDIT CONCLUSION	14
6.0	RECOMMENDATION	15
	List of Attachment	
	Attachment 1 : Map of SOU Lavang Pekaka	16
	Attachment 2 : RSPO Surveillance Audit Plan	23
	Attachment 3 RSPO P&C Audit Checklist and Findings	27
	Attachment 4 : Details of Non-conformities and Corrective Actions Taken	61
	Attachment 5 RSPO Supply Chain at the palm oil mill – Mass Balance Model – Module E	63
	Attachment 6 : Status of Non-conformities Previously Identified	74
	Attachment 7 : Time-bound Plan	77

#### 1.0 AUDIT PROCESS

#### 1.1 Certification Body

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

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

#### 1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Zulfakar Kamaruzaman	Lead Auditor Land Title, HCV and SC	Holds a B.Sc. Forestry. He had several years of working experience in the oil palm operation. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor.
Selvasingam T Kandiah	Auditor GAP, Health & Safety related to plantation	Holds a B.Sc. (Hons) in Agriculture, he had work as a planter with Kumpulan Guthrie Berhad for more than 10 years including one year in Liberia and 2 years in Estate Department in Guthrie Headquarters.
Rozaimee Ab. Rahman	Auditor Time Bound Plan and Environment	Holds a B. Sc. of Agriculture. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO.
Amir B Bahari	Auditor, Occupational health and safety & Environment	Possessed B Sc (Hons) USM and Diploma Palm Oil Milling Technology/Management 1996 MPOB. Working experience for 30 years in the oil palm industry including in the mill and estates. A qualified RSPO P & C Auditor with experience in ISO, EMS and RSPO/MSPO auditing.
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 and CoC and RSPO P&C

### 13 Audit methodology

The scope of the audit was based on a sampling of the supply bases. In total there are 10 (ten) estates (Lavang Estate, Belian Estate, Rasan Estate, Kelida Estate, Lavang Special Estate, Pekaka Estate, Ruai Estate, Paroh Estate, Dulang Estate and Chartquest Estate). Audit team used the 0.8√y formula to determine the management units sampling to be focused on and also considered the issues raised by stakeholder. Based on this formula, the team of auditors determined that the sampling locations are Lavang Palm Oil Mill and 4 (four) estates (Pekaka Estate, Lavang Special Estate, Paroh Estate, Ruai Estate).

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

#### 2.0 SCOPE OF CERTIFICATION AUDIT

#### 2.1 Description of the certification unit

The Lavang Pekaka Certification Unit (CU) is one of the Strategic Operating Unit (SOU) of Sime Darby Plantation Sdn Bhd (SDPSB). The CU is in Bintulu, Sarawak, East Malaysia and known as SOU 31 and SOU 33. The CU consisted of one palm oil mill, the Lavang Palm Oil Mill (LPOM) and 10-supply bases, namely, Lavang Estate, Belian Estate, Rasan Estate, Kelida Estate, Lavang Special Estate, Pekaka Estate, Ruai Estate, Paroh Estate, Dulang Estate and Chartquest Estate. All Estates belong to SDPB. LPOM commenced operations in 1993 with a processing capacity of 90 metric tonnes of (FFB) per hour. Lavang POM obtained certified FFB from own certified supply base and as well as external supplier i.e. Subis Plantation. The total combined land area of the ten estates is 23,642.81 hectares (Ha) of which 20,984.45 Ha planted with oil palm. All the estates have been fully developed before 2005, hence Principle 7 of the RSPO P&C is therefore not applicable.

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

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

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

Estatos	FFB Pro	FFB Production				
Estates	Tonnes	Percentage (%)	Certifying CB			
Lavang	22,387.64	7.89	SIRIM			
Rasan	49,390.12	17.40	SIRIM			
Pekaka	28,009.05	9.87	SIRIM			
Kelida	26,062.46	9.18	SIRIM			
Lavang Special	17,581.76	6.20	SIRIM			
Belian	30,800.42	10.85	SIRIM			
Dulang	35,364.07	12.46	SIRIM			
Chartquest	20,911.31	7.37	SIRIM			
Paroh	23,794.37	8.38	SIRIM			
Ruai	27,213.76	9.59	SIRIM			
Total	281,514.96	99.20				
Noncertified FFB Subis Plantation	2,258.94	0.80	-			
Overall FFB	283,773.90	100.00				

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

(00: 20:0 Osp: 20:0)					
Estates	FFB Pro	FFB Production			
Estates	Tonnes	Percentage (%)	Certifying CB		
Lavang	26088.00	9.21	SIRIM		
Rasan	50930.00	17.99	SIRIM		
Pekaka	22765.03	8.04	SIRIM		
Kelida	27074.00	9.56	SIRIM		
Lavang Special	15436.00	5.45	SIRIM		
Belian	35910.00	12.68	SIRIM		

Dulang	29310.60	10.35	SIRIM	
Chartquest	19,750.96	6.98	SIRIM	
Paroh	27500.00	9.71	SIRIM	
Ruai	28,365.55	10.02	SIRIM	
Total	283,130.14	100		

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

	1
RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	281,514.96
FFB Processed	283,773.90
Certified FFB Processed	281,514.96
Non-certified FFB Processed	2,258.94
Crude Palm	Oil (CPO)
Overall CPO Production	58,264.37
Certified CPO Production	58,264.37
Certified CPO delivered as RSPO	5,600.00
Certified CPO delivered as non-RSPO	52,664.37
Certified CPO delivered under other sustainable	0.00
schemes	
Palm Ker	nel (PK)
Overall PK Production	14,740.23
Certified PK Production	14,740.23
Certified PK delivered as RSPO	4,800.00
Certified PK delivered as non-RSPO	9,940.23
Certified CPO delivered under other sustainable	0.00
schemes	

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

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	283,130.14
FFB Processed	283,130.14
Certified FFB Processed	283,130.14
Non-certified FFB Processed	0.00
Crude Palm	Oil (CPO)
Overall CPO Production	59,429.02
Certified CPO Production	59,429.02
Certified CPO delivered as RSPO	59,429.02
Certified CPO delivered as non-RSPO	0.00
Certified CPO delivered under other sustainable	0.00
schemes	
Palm Ker	nel (PK)
Overall PK Production	13,675.19
Certified PK Production	13,675.19
Certified PK delivered as RSPO	13,675.19
Certified PK delivered as non-RSPO	0.00
Certified CPO delivered under other sustainable	0.00
schemes	

Table 6 Planted and certified area of SOU Lavang Pekaka

Estate	Planted (ha)	Certified (ha)
Lavang	1732.46	1937.53
Rasan	3190.76	3454.00
Pekaka	2646.64	2626.14
Kelida	1758.56	2460.00
Lavang Special	1131.88	1193.73
Belian	2546.10	2885.84
Dulang	2281.96	2548.00
Chartquest	1321.30	1448.71
Paroh	2082.76	2627.90
Ruai	2292.03	2460.96
Total	20,984.45	23,642.81

Table 7: Planting profile for Lavang Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2016	2 <sup>nd</sup> generation	Immature	339.47	19.59
2017	2 <sup>nd</sup> generation	Immature	142.98	8.25
2018	2 <sup>nd</sup> generation	Immature	98.48	5.68
1997	1 <sup>st</sup> generation	Mature	766.99	44.27
2011	2 <sup>nd</sup> generation	Mature	191.74	11.07
2013	2 <sup>nd</sup> generation	Mature	93.46	5.39
2015	2 <sup>nd</sup> generation	Mature	99.34	5.73
	Total		1732.46	100

Table 8: Planting profile for Rasan Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1997	1 <sup>st</sup> generation	Mature	1758.65	55.12
1998	1 <sup>st</sup> generation	Mature	586.97	18.40
2004	2 <sup>nd</sup> generation	Mature	63.11	1.98
2016	2 <sup>nd</sup> generation	Immature	330.36	10.35
2017	2 <sup>nd</sup> generation	Immature	267.7	8.39
2018	2 <sup>nd</sup> generation	Immature	183.97	5.77
	Total	_	3190.76	100

Table 9: Planting profile for Pekaka Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2015	2 <sup>nd</sup> generation	Immature	332.09	12.55
2016	2 <sup>nd</sup> generation	Immature	369.63	13.97
2017	2 <sup>nd</sup> generation	Immature	257.02	9.71
2018	2 <sup>nd</sup> generation	Immature	276.29	10.44
1990	1 <sup>st</sup> generation	Mature	178.38	6.74
1991	1 <sup>st</sup> generation	Mature	60.24	2.28
1992	1 <sup>st</sup> generation	Mature	191.83	7.25
1993	1 <sup>st</sup> generation	Mature	62.97	2.38
2012	2 <sup>nd</sup> generation	Mature	484.73	18.31
2014	2 <sup>nd</sup> generation	Mature	249.32	9.42
2015	2 <sup>nd</sup> generation	Mature	184.14	6.96
	Total		2646.64	100

# Table 10: Planting profile for Kelida Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2015	2 <sup>nd</sup> generation	Immature	85.13	4.84
2017	2 <sup>nd</sup> generation	Immature	199.11	11.32
2018	2 <sup>nd</sup> generation	Immature	64.6	3.67
1998	1 <sup>st</sup> generation	Mature	476.43	27.09
2009	1 <sup>st</sup> generation	Mature	82.66	4.70
2010	2 <sup>nd</sup> generation	Mature	174.55	9.93
2011	2 <sup>nd</sup> generation	Mature	184.6	10.50
2012	2 <sup>nd</sup> generation	Mature	162.68	9.25
2013	2 <sup>nd</sup> generation	Mature	72.56	4.13
2014	2 <sup>nd</sup> generation	Mature	256.24	14.57
	Total		1758.56	100

## Table 11: Planting profile for Lavang Special Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2016	2 <sup>nd</sup> generation	Immature	58.39	5.16
2017	2 <sup>nd</sup> generation	Immature	105.6	9.33
2018	2 <sup>nd</sup> generation	Immature	126.37	11.16
1998	1 <sup>st</sup> generation	Mature	200.86	17.75
1999	1 <sup>st</sup> generation	Mature	246.4	21.77
2001	1 <sup>st</sup> generation	Mature	394.26	34.83
	Total		1131.88	100

# Table 12: Planting profile for Belian Estate

Year of	Planting cycle (1st, 2nd, 3rd,	Mature / Immature	Planted area	Percentage of
planting	etc.		(ha)	planted area (%)
planting	Generation)		(IIa)	pianteu area (70)
2016	2 <sup>nd</sup> generation	Immature	332.82	13.07
2018	2 <sup>nd</sup> generation	Immature	198.3	7.79
2019	2 <sup>nd</sup> generation	Immature	123.79	4.86
1998	1 <sup>st</sup> generation	Mature	1015.1	39.87
2001	1 <sup>st</sup> generation	Mature	34.68	1.36
2004	1 <sup>st</sup> generation	Mature	30.55	1.20
2012	2 <sup>nd</sup> generation	Mature	203.23	7.98
2013	2 <sup>nd</sup> generation	Mature	202.86	7.97
2014	2 <sup>nd</sup> generation	Mature	204.72	8.04
2015	2 <sup>nd</sup> generation	Mature	200.05	7.86
	Total		2646.1	100

## Table 13: Planting for profile Dulang Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2017	2 <sup>nd</sup> generation	Immature	155	6.79
2018	2 <sup>nd</sup> generation	Immature	279	12.23
1992	1 <sup>st</sup> generation	Mature	269.94	11.83
1993	1 <sup>st</sup> generation	Mature	519.9	22.78

1994	1 <sup>st</sup> generation	Mature	316	13.85
1995	1 <sup>st</sup> generation	Mature	167	7.32
2012	2 <sup>nd</sup> generation	Mature	132	5.78
2013	2 <sup>nd</sup> generation	Mature	99	4.34
2014	2 <sup>nd</sup> generation	Mature	190	8.33
2015	2 <sup>nd</sup> generation	Mature	154.12	6.75
	Total		2281.96	100

Table 14: Planting profile for Chartquest Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2016	2 <sup>nd</sup> generation	Immature	211.1	15.98
2017	1 <sup>st</sup> generation	Immature	114.86	8.69
1997	1 <sup>st</sup> generation	Mature	995.34	75.33
	Total		1321.3	100

Table 15: Planting profile for Paroh Estate

		alon <u>Lotato</u>		
	Planting cycle	Mature / Immature		
Year of	(1st, 2nd, 3rd,		Planted area	Percentage of
planting	etc.		(ha)	planted area (%)
	Generation)			
2015	2 <sup>nd</sup> generation	Immature	167.69	8.05
2016	2 <sup>nd</sup> generation	Immature	175.13	8.41
2017	2 <sup>nd</sup> generation	Immature	170.09	8.17
2018	2 <sup>nd</sup> generation	Immature	59.19	2.84
1993	1 <sup>st</sup> generation	Mature	144.97	6.96
1994	1 <sup>st</sup> generation	Mature	845.45	40.59
1995	1 <sup>st</sup> generation	Mature	145.31	6.98
2014	2 <sup>nd</sup> generation	Mature	191.88	9.21
2015	2 <sup>nd</sup> generation	Mature	183.05	8.79
	Total		2082.76	100

Table 16: Planting profile for Ruai Estate

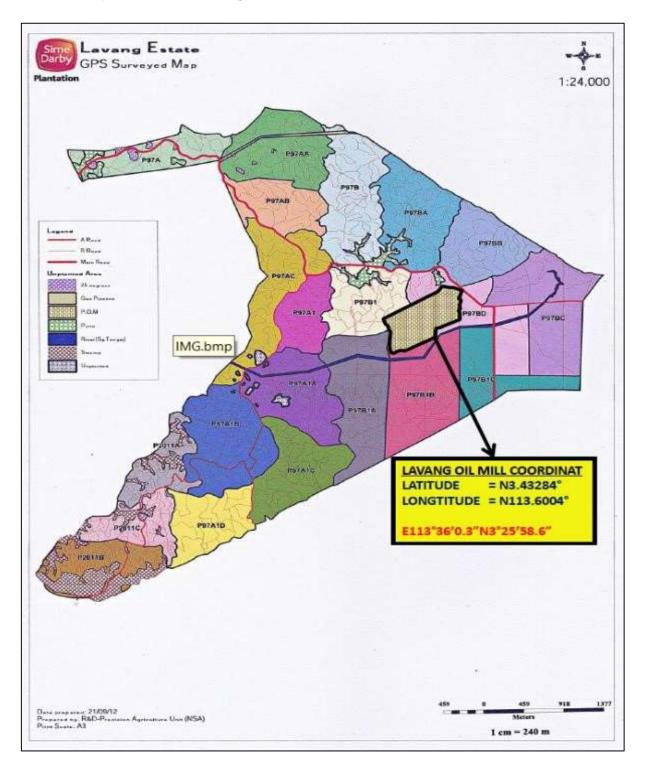
Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2016	2 <sup>nd</sup> generation	Immature	207.06	9.03
2017	2 <sup>nd</sup> generation	Immature	230.58	10.06
2018	2 <sup>nd</sup> generation	Immature	173.14	7.55
1992	1 <sup>st</sup> generation	Mature	583.57	25.46
1993	1 <sup>st</sup> generation	Mature	517.27	22.57
2012	2 <sup>nd</sup> generation	Mature	148.37	6.47
2013	2 <sup>nd</sup> generation	Mature	158.92	6.93
2014	2 <sup>nd</sup> generation	Mature	273.12	11.92
	Total		2292.03	100

_
√ No
:
s from 2017 to
PT Sime Indo
Ria, PT Guthrie
<u>Budidaya Agro</u>
No
und plan?
rovided in
√ No
No
CU.
√ No
RE

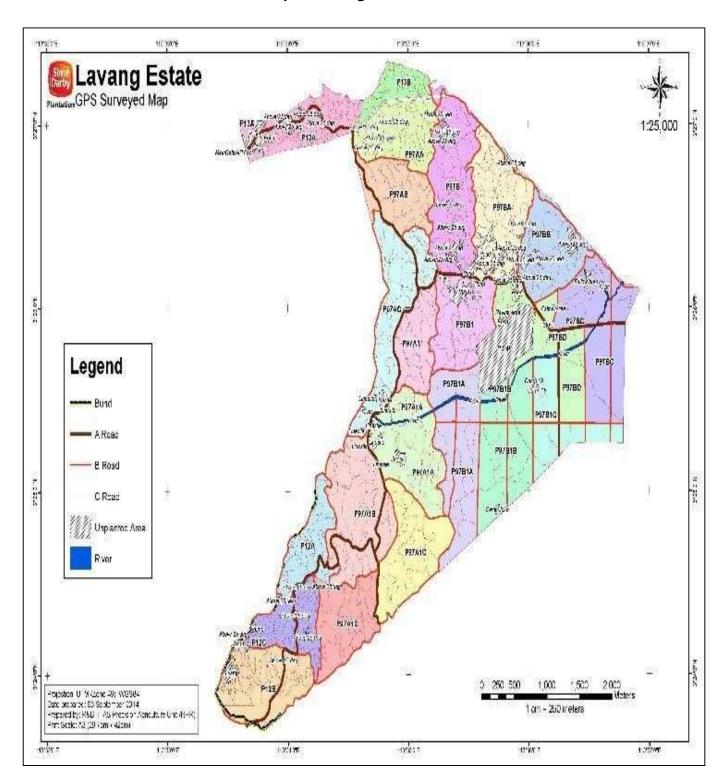
3.3	Other changes (e.g. organizational structure, new contact person, addresses, etc.)								
	Sime Darby Plantation Sdn Bhd has	been chang	ed to Sime Dar	by Plan	tation Ber	had.			
3.4	Status of previous non-conformities *  * If not closed, minor non-conformity will be upgraded to major non conformity  Not closed*								
3.5	Complaint received from stakeholder (if any) No complaints from stakeholders were observed.								
4.0	DETAILS OF NON-CONFORMITY REPORT								
4.1	For P&C (Details checklist refer to A	attachment 3)	:						
	Total no. of minor NCR(s) (details refer to Attachment 4)	List: 1	4.6.7						
	Total no. of major NCR(s) (details refer to Attachment 4)	List: 3	1.1.2, 4.3.4, 6	.5.1					
4.2	For SC (Details checklist refer to Att	achment 5):							
	Total no. of minor NCR(s) (details refer to Attachment 5)	List : -							
	Total no. of major NCR(s) (details refer to Attachment 5)	List:							
5.0	AUDIT CONCLUSION								
	The audit team concludes that the organization has established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.								

6.0	RECOM	MENDATIC	ON .						
		No NCR	No NCR recorded. Recommended to continue certification.						
			or NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) be carried out in the next audit.						
			nor NCRs raised in the audit which ard to major NCRs.	e not addressed in the subsequ	uent audit shall be				
			Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.						
		Recomm	Recommended to continue certification.						
		provided	Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s) have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.						
			ajor NCRs which are not addresse e being withdrawn.	ed within a further 60 days s	hall result in the				
7.0	7.0 IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED. RECOMMENDED FOR CONTINUATION OF RSPO P & C CERTIFICATION.								
Aud	it Team Le	ader :	MOHD ZULFAKAR KAMARUZAMAN	- Styl	1/2/2019				
		_	(Name)	(Signature)	(Date)				

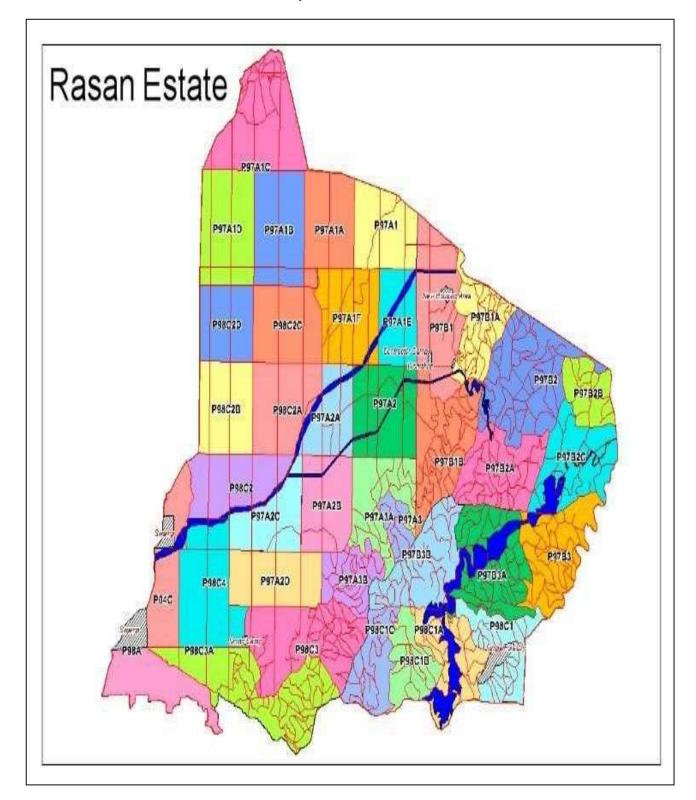
# **Location Map of SOU 31- Lavang POM**



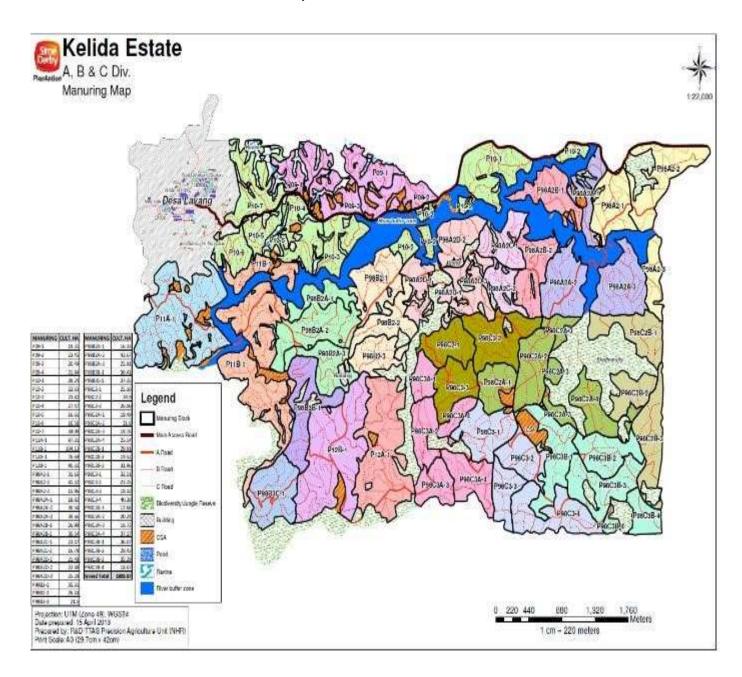
# **Map of Lavang Estate**



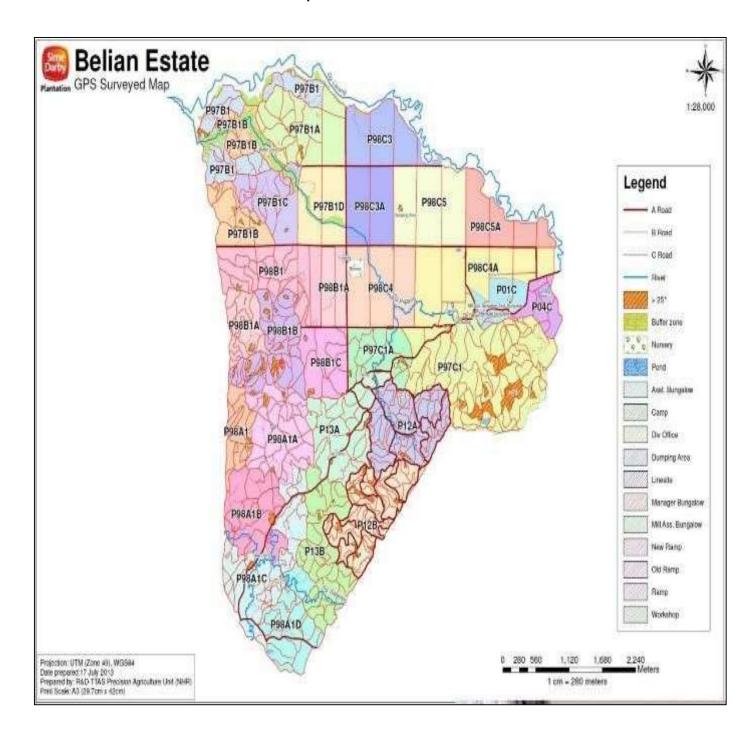
## Map of Rasan Estate



## Map Of Kelida Estate

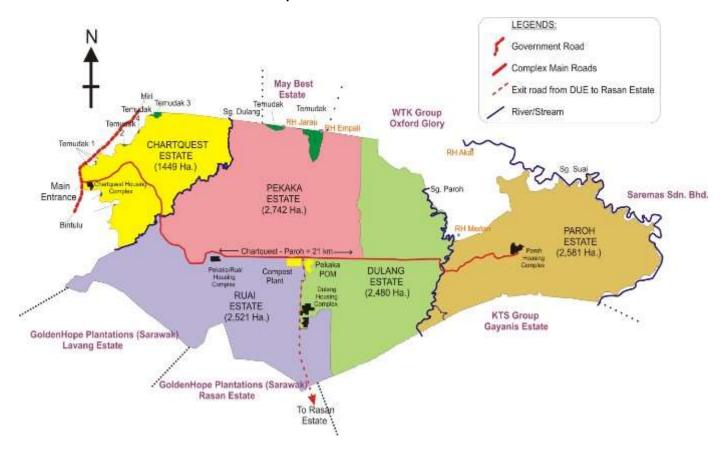


## Map of Belian Estate



**Map of Lavang Special Estate** LAVANG SPECIAL ESTATE PLANTATION To Lavang Oil Mill & Main entrance LEGEND J15 BLOCK BOUNDARY LINE & GRAVEL ROAD Tangsi Division J12 ESTATE/DIVISION BOUNDARY LINE SD SCHA C37 26.00HA J10 GRAVEL ROAD MAIN ROAD To Bukit Panglima & Main Entrance TO PASAN ESTATE C34 32.59HA J6 **Spod Division** C30 37.15HA C28 36.00HA C29 S6.00HA G26 36.00HA C15 15.80HA 012 403000A TO KELIDA ESTATE. Field No. 98C - 325.79 ha 99C -431.34 ha 01C -425.64 ha 1,182.77 ha R Filename: Lvg Jungle.com C Updaled 20/12/1999 securi

## Map of SOU 34 Pekaka



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 : 29 October to 2 November 2018

3. Site of assessment : SOU Lavang SOU Pekaka

Lavang Palm Oil Mill

Pekaka Estate

Lavang Special Estate

Paroh EstateRuai 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

d. Company's audit criteria including Company's Manual / Procedures

### 5. Assessment Team

a) Lead Auditor : MOHD ZULFAKAR KAMARUZAMAN (HCV, SC)

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

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

: HAZANI Othman (Social)

: SELVASINGAM T KANDIAH (GAP, Safety)

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

#### 7. Audit Method

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

### 8. Audit Findings

Audit findings shall be classified as major and/or minor. <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	AB	MZK	RAR	НО	STK
Day 0-28/10/18	MH 2594: Audit team All 5 auditors travel from KLIA to Miri.	/	,	,	,	/
5.00pm- 7.35pm	Representative from SOU Lavang to arrange transportation from Miri Airport to Lavang Guest House	/	/	,	/	
Day 1-29/10/18	Opening Meeting – Venue: Ruai Estate					
8.30am – 9.15am	Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria	_				
	and programmes	/	/	/	/	/
	Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure,					
0.45 40.00	certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings.					
9.15am – 12.30pm	Site observation to Pekaka Estate 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.					
12.30pm – 1.30pm	Lunch Break					
1.30pm – 5.00pm	Continue assessment at respective sites	/	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	AB	MZK	RAR	НО	STK
Day 2 – 30/10/18	Site observation to Paroh Estate					
8.30am - 12.30pm	P1, P2, P3,P4,P5, P6, P7,P8					
	Social aspects -SIA, management plan & implementation, workers' quarters,					
	Stakeholder consultation with affected communities surrounding the Estate				/	
	<ul> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> </ul>	/	/	/		/
	Occupational safety & health aspects , chemical management					
	Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching,					
	IPM New planting					
10.00000 1.00000	Environmental management, waste & chemical management	1				
12.30pm – 1.30pm	Lunch Break	,	,	,	,	,
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/	/
/=						0=14
<b>Date / Time</b> Day 3 – 31/10/18	Coverage of assessment / Activity / Site	AB	MZK	RAR	НО	STK
8.30am – 12.30pm	Site observation to Lavang POM P1, P2, P3,P4,P5, P6, P7,P8					
0.30aiii – 12.30piii	<ul> <li>Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> </ul>					
	Stakeholder consultation with affected communities surrounding the POM					
	<ul> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> </ul>	/	/	,	,	,
	Occupational safety & health aspects , chemical management	<b>'</b>	<b>'</b>	,	/	<b>'</b>
	Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching,					
	IPM New planting					
	Environmental management, waste & chemical management					
12.30pm – 1.30 pm	Lunch Break			_		
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	AB	MZK	RAR	НО	STK

Day 4 – 1/11/18 8.30am – 12.30pm	Site observation to Lavang Special P1, P2, P3,P4,P5, P6, P7,P8  Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the Estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Occupational safety & health aspects, chemical management Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, IPM New planting Environmental management, waste & chemical management	/	,	/	/	/
12.30pm – 1.30 pm	Lunch Break					
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	AB	MZK	RAR	НО	STK
Day 5 – 2/11/18 8.30am – 12.30pm	<ul> <li>Site observation to Ruai Estate</li> <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 Estate</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>	/	/	/	/	/
12.30pm – 1.30 pm	Lunch Break					
2.30pm –3.00pm	Continue assessment at respective site	/	/	/	/	/
3.00 pm – 4.00 pm	Audit Team Discussion	/	/	/	/	/
4.00pm – 5.00pm	Closing meeting	/	/	/	/	/

## 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,	1.1.1	There shall be evidence that growers and millers provide adequate information upon request for information on issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.	YES	SOU Lavang Pekaka continued to implement their documented communication procedure. At time of audit there was no request for information from the stakeholders. All the estates and mill of the CU had provided management documents i.e. related to environment, and social and legal issues, 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>
social and legal issues relevant to RSPO Criteria, in 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	NO	The CU had identified personnel responsible for handling of complaints. Records of communication were maintained at respective estate and mill 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 stakeholders. Among the records inspected were correspondences with the authorities, local communities and employees. The latest communications sighted was request for repairs at employee housing. However, it was found that, the information given to CB on Certified Area and Conservation set aside at SOU 31 Lavang, SOU 34 Pekaka was not correct. Thus a Major NCR MZK 01 2018 has been raised
C 1.2 Management	1.2.1	Land titles/user rights	YES	There was no change in the land ownership / user right. Copies of land titles, which indicate the use right were reviewed. Original copies of land titles maintained kept in Head Office.
documents are publicly available, except where this is prevented by		Occupational health and safety plans	YES	SDPSB continued to use website for disseminating public information. Information relating to safety and health plans were available through SDPSB website at http://plantation.simedarby.com. The implementation of OSH plan was monitored by internal audits conducted by OSH officers from SQM department.
commercial confidentiality or where disclosure of information would		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: the Social Impact Assessment and Social Action Plans.
result in negative environmental or social outcomes.		Pollution prevention and reduction plans	YES YES	HCV documentation maintained available (Cross refer Criteria 5.2).  The list of waste generated from estate and mill activities maintained available. All sources of pollution have been identified by management-Pollution Prevention Plan 2018. Mitigation measure and action taken also made available. Among of activities covered include nursery, growing, drainage, planting, fertilizing, scheduled waste management and mill operation.
		Details of complaints and grievances	YES	Details of complaints can be written in the Complaints Book and to be resolved in accordance with the Complaint & Grievances Resolution Procedure. Nomcomplaint and grievances was observed.

Clause		Indicators	Comply Yes/No	Findings
		Negotiation procedures	YES	Negotiation procedure for the SOU Pekaka Lavang is contained in the "Flowchart and Procedures On Handling Land Dispute". This document was made available and sighted during the Surveillance Audit. No land dispute between third parties and any of the units was observed.
		Continual improvement plans	YES	The continual improvement plans were available established. They were being maintained and updated with the assistance and guide personnel from Sustainability Department. Sime Darby Plantation Berhad is committed to utilise the established system to regularly monitor and review their key activities at the mill and estates. Relevant action plans were initiated to continuously improve its key areas of operations, environmental, safety, health and welfare of the workers as well as social contribution to the community.
		Public summary of certification assessment report;	YES	The Public summary is available in website: http://www.sirim-qas.com.my.
		Human Rights Policy (Criterion 6.13).	YES	The CU subscribes to SDPB's Social & Humanity Management Policy dated Jan 2015. The policy was signed by the SDPB's Managing Director and are being displayed on various notice boards at the Mill and the estates offices. The policy states among other things, that the business is to be carried out with a sense of humanity, ensuring they are socially beneficial and do not infringe on basic human rights
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	SOU Lavang Pekaka subscribes to SDPB's Code of Business Conduct which contains among others, the following aspects of business conduct:  - Equal opportunity and non-discrimination - Criminal activities - Harassment ad violence - Avoiding conflicts of interests - Guarding against bribery and corruption - Anti money laundering and anti-terrorism financing - How to report a violation  It was observed maintained in the document COBC (Kod Etika Kerja). The document was available to all employees by being displayed at each office notice boards.

Clause	Indicators		Comply Yes/No	Findings
C 2.1 There is compliance	2.1.1	Evidence of compliance with relevant legal requirements shall be available.  Major Compliance	YES	Generally, SOU Lavang Pekaka continued to comply with most of the applicable local, national and ratified international laws and regulations. Relevant licenses and permits were verified at SOU Lavang Pekaka.
with all applicable local, national and 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 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 SOU 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. The mechanism for ensuring compliance was ensured by PSQM Department MSPO/RSPO internal audits, Agronomic visits, PA visits and Mill Advisors visits.
	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. The CU had entirely adopted the SDPB established documented system for identifying, tracking, accessing and updating the legal requirements. It had ensured that all applicable legal requirements pertaining to RSPO are established, implemented and maintained.
C 2.2 The right to use the land is demonstrated, and is not legitimately contested by local people	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	Evidence of legal ownership of the land including history of land tenure was verified during this audit. For Pekaka, Dulang, Paroh Lavang Special and Ruai Estate the land was previous own by Wangsa Mujur Sdn Bhd and Golden Hope Plantations (Sarawak) Sdn Bhd then Transfer to Sime Darby after merged with Sime Darby in 2007. Wangsa Mujur Sdn Bhd and Golden Hope Plantations (Sarawak) Sdn Bhd has bought the land from Sarawak Government on 18 Dec 1985. Each estate had legal use of the land through an Ownership signed by the Superintendent of Lands and Surveys of Bintulu following the payment of premium and land fee.
who can demonstrate that they have legal, customary or	2.2.2	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and reserves.  Minor Compliance	YES	Boundary stones / markers along the legal boundaries observed visibly maintained by the SOU Lavang and Pekaka. Auditor has verified the boundary stone and pegs at Pekaka, Paroh, Ruai, Lavang Special. The boundary pegs were visible along the boundary adjacent to another plantation area which is own estate, smallholder plantation and outsider plantation.
user rights.	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	YES	As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby since 1985. The audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed relevant stakeholders and from the interviews, it can be concluded that there was no evidence of any land dispute at SOU Lavang Pekaka.

Clause	indicators		Comply Yes/No	Findings
		these have been accepted with FPIC. Minor Compliance		
	2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes are implemented and accepted by the parties involved. Major Compliance	YES	As reported in 2.2.1 of this checklist, it has been verified that the land is legitimately owned by Sime Darby since 1985. Hence, there is no land conflict anticipated and no need for acceptable conflict resolution processes. The audit team has also interviewed relevant stakeholders and from the interviews, it can be concluded that there was no evidence of any land dispute at SOU Lavang Pekaka with their neighboring private oil palm estates and villagers.
	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	As reported in 2.2.1, it has been verified that there is no conflict or dispute over the land. Auditor has verified this through Stakeholder meetings and JKKP Meetings and interviewed with settlers and other oil palm plantation companies that there was no violence action taken by the SOU Lavang Pekaka in maintaining peace.
	2.2.6	To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations.  Major Compliance	YES	As reported in 2.2.1 of this checklist, it has been verified that the land is legitimately owned by Sime Darby since 1985. Hence, there was no land conflict anticipated nor the need to avoid escalation of conflict is required. Auditor has verified this through Stakeholder meetings and JKKP Meetings and interviewed with settlers and other oil palm plantation companies. From the interviews, it was confirmed that there is no evidence that the oil palm operations have instigated violence in maintaining peace and order in their current and planned operations.
C 2.3 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior, and informed consent.	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).  Major Compliance	YES	As reported in 2.2.1 of this checklist, SOU Lavang Pekaka has been developed since 1985, after it was bought from the previous land owner; Sarawak Government on 18 December 1985. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. Hence, there was no need for the establishment of map showing the legal, customary, or user right of other users as required by this indicator.

Clause		Indicators	Comply Yes/No	Findings
	2.3.2	Copies of negotiated agreements detailing the process of FPIC shall be available and shall include: 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; 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; c)Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land.  Minor Compliance	YES	As reported in 2.2.1 of this checklist, SOU Lavang Pekaka has been developed since 1985, after it was bought from the previous land owner; Sarawak Government on 18 December 1985. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. Based on the audit findings, copies of negotiated agreements on FPIC and other evidences required by these indicators a) to c) were not applicable.
	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	As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to SOU Lavang Pekaka.
	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	As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to SOU Lavang Pekaka.

# 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	3.1.1	A business or management plan (minimum three years) shall be documented That includes, where appropriate, a business case for scheme smallholders. Major Compliance	YES	The 4 estates, i.e. Pekaka, Paroh, Lavang Special and Ruai, continued to commit to long-term economic and financial viability. The annual budgets for 2018/19 to 2023/2024 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.
financial viability.	3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, shall be available.  Minor Compliance	YES	The long-range replanting program until 2024/25 were sighted for both Estates. This program 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		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	Lavang SOU 31 / 34 continued to use and implement SOPs for each of the processes. Brief version of the SOPs was displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOPs. All the estates and mill operations were guided through the manuals and SOPs. The procedures as documented in the Agriculture Reference Manual were disseminated to the staff/workers through morning briefings and trainings. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The ARM included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.
	4.1.2	A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	Yes	The mechanisms to check the implementation of procedures were carried out by Manager, Assistants field staff including the Medical Assistant via Daily field /work supervision, internal audit, safety and health meeting, routine inspection (workplace inspection) and monthly performance/cost review.
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	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.

Clause	Indicators		Comply Yes/No	Findings
	4.1.4	The mill shall record the origins of all third- party sourced Fresh Fruit Bunches (FFB). Major Compliance	YES	The non-certified FFB are from independent FFB suppliers which was Subis Plantation. All delivery documents were verified volumes of FFBs received by the mill either from Sime Darby owned estates or third parties were indicated in all the documents.
C 4.2 Practices maintain soil fertility at or, where possible, improve oil fertility to a level that ensures optimal	4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible.  Minor Compliance	YES	All 4 estates visited 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 also made based on annual foliar sampling while soil sampling was carried out on a 5 year cycle basis.
and sustained yield.	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	YES	All 4 Estates visited, Pekaka, Paroh, Lavang Special & Ruai, continued to monitor their fertilizer inputs as recommended by their agronomist from Sime Darby Research Sdn. Bhd. Fertiliser application program was monitored using records like manuring master plan, program sheets, bin cards, field cost book, manuring audits by Planning and Monitoring Department under Upstream Department from headquarters. Records of programs and applications of fertilisers were made available to auditors.
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	YES	Periodic tissue and soil sampling were carried out in the Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitor the changes in the organic carbon and total nitrogen. For all 4 estates Agronomic assessment and fertiliser recommendation was conducted by Sime Darby Research Sdn. Bhd. to of formulate the FY2019 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement.
	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	All 4 Estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of Solid POME. In addition, during replanting, palms were felled, chipped, windrowed and left to decompose.
C 4.3 Practices minimise and control erosion and degradation of	4.3.1	Maps of any fragile/marginal soils shall be available. Major Compliance	YES	Based on the soils maps except for Paroh Estate all other 3 Estates i.e. Pekaka, Lavang Special and Ruai had peat soils. The soil maps came with description of the soils characteristics such as texture, depth, drainage, parent material and key aspect for management.
soils.	4.3.2	A management strategy shall be in place for plantings on slopes between 9 and 25 degrees unless specified otherwise by the company's SOP. Minor Compliance	YES	Like all SDPB Estates, the Estates in visited in Lavang/Pekaka SOU 31/34 continued to have a management strategy for planting on slopes in order to minimise and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by: Slope & River Protection Policy, Buffer Zone & 25 degree slope and in the ARM Manual.
	4.3.3	A road maintenance programme shall be in place. Minor Compliance	YES	All 4 Estates i.e. Pekaka, Paroh, Lavang Special and Ruai continued to maintain its road, according to the road maintenance programmes. The programs had been supported by adequate provisions in the budgets.

Clause		Indicators	Comply Yes/No	Findings
	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	NO	The estates monitored water levels using water level markers in drains and water tubes for ground water levels. However, on Pekaka Estate – there was no records to show that subsidence of peat soils is being monitored for which the Major NCR STK 01 2018 was issued.
	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	Records showed that a Pilot Trial on "Peat Drainability Assessment" had been conducted in March to May 2018 for SOU 31 & 34.
	4.3.6	A management strategy shall be in place for other fragile and problem soils.  Minor Compliance	YES	The estates monitored water levels using water level markers in drains and water tubes for ground water levels.
C 4.4 Practices maintain the quality and	4.4.1	An implemented water management plan shall be in place. Minor Compliance	YES	The Estate had implemented water managements plans which covered Water shortage contingencies, Water pollution prevention, Reduce wastage, Identification & management of waste waters, Monitoring rainfall and Regular water quality analysis.
availability of surface and ground water.	4.4.2	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.  Major Compliance	Yes	The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management.
	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	Based on the written approval, LPOM has required zero discharge. All final discharge has been converted to compost plan and has been applied to Lavang Estate. Sighted quarterly report has been submit to DOE by quarterly basis.
	4.4.4	Mill water use per tonne of FFB shall be monitored. Minor Compliance	YES	The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis. 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	4.5.1	Implementation of IPM plans shall be monitored. Major Compliance	YES	All the estates continued to implement the 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.
invasive introduced species are effectively managed using appropriate IPM 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 - Plant Protection was conducted by Assistant Managers of all estates.

Clause		Indicators	Comply Yes/No	Findings
C 4.6 Pesticides are used in ways that do not endanger health or the environment.	4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available.Major Compliance	YES	All the estates continued to use agrochemicals based on its Agricultural Reference Manual SOP and in the Pictorial Safety Standard Book 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.
	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 the estates continued to have records to show the types of pesticides used with active ingredients and their LD50, where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available for verification
	4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with IPM plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice. Major Compliance	YES	All the estates continued to minimise the usage of agrochemicals by implementing IPM. Blanket spraying was not practiced by this CU and soft grasses maintained in the field. It has been observed that Beneficial Plants and LCC were planted.
	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 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). Minor Compliance	YES	All the estates only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH 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
	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 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.
	4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes. Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Regulations. Major Compliance	YES	The chemical stores in all estates / mill were observed to follow the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations.
	4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	NO	During the audit, it was noted that the CU had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions. Paraquat was not used in the estate.  However, noted that Pekaka Estate were doing spraying using KENLON.  a) Sprayers carrying the chemicals individually attached to the chemicals pumps and self-mixing for consumption, instead of the bulk pre-mixing method. b) Sprayers were not using googles though being provided as PPE.  Such practices were against the procedure that was to premix the chemicals in bulk prior to transporting to the fields and as such a Minor NCR AB 01 is raised. The usage of the PPE was also not adhered even though provided by the management.
	4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. Major Compliance	YES	Aerial spraying was not practiced by all the estates. There was no evidence to show that any had been carried out. All estates only practices circle spraying and selective spraying which is only for targeted species such as woodies and VOPs. This is confirmed through records verification and observation during the site visit, estate complex and interview with the employees.
	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.

Clause		Indicators	Comply Yes/No	Findings
	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 SOU Lavang, procedure 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. Interview with staffs and workers confirmed that they had understood the hazards involve and how the chemicals should be used and disposed in a safe manner.
	4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. Major Compliance	YES	The medical surveillance (OHD) being carried out accordingly by an authorised OHD. All employees examined were issued with clean bill of health and allow to continue to their respective duties.
	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. 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 plan is documented,	4.7.1	An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. Major Compliance	YES	The Group Occupational Safety & Health Management Policy had been established and implemented. The policy was signed by the Managing Director of Sime Darby Plantation and displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the Regional SQM Executives and monitored by SQM Department at Head Office.
effectively communicated and implemented. The occupational health and safety plan shall cover the following:	4.7.2	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.  Major Compliance	YES	Both the mill/estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The HIRARC records, as well as CHRA reports were verified during the assessment. HIRARC for the mill and estates was reviewed in July-Aug 2018. The significant and routine activities for mill and estates were adequately covered.
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practices. Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. Major Compliance	YES	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. Along the journey inside the field drivers and harvesters were noted to be in safety helmets and their sickle, harvesting knife covered with the approved type. 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. Bulk of the mill training is organized during the daily briefing prior to work commencement of each shift. Mainly the issues discussed / briefed were related to mill process operations and safety compliance. These training records are maintained in a separate book and were sighted during the audit.

Clause		Indicators	Comply Yes/No	Findings
	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 health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. Major Compliance	YES	The Estates / Mill Managers were appointed as the Chairman of the ESH committee. The letter of appointment for the Managers signed by the Regional CEO was sighted. The Manager subsequently assigned duties of ESH coordinator to the appointment Assistants for the down line implementation of ESH practices in the estates. Similar was made for all the estates and the mill. All identified Executives were officially given a letter for such an appointment. Both estates and the mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held by both estates are recorded below.
	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	The accident and emergency procedures are available in adherence to the SDPB policy on 'Crisis Management & Emergency Response' plan of PQMS, OSH manual and "Accident and Reporting and Investigation Procedure' of the same manual. Each estates and mill had procedures emergencies situation as listed below in the table. There was formation of ERP Team & ERP for all the identified incidences. The organisation 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.
	4.7.6	All workers shall be provided with medical care, and covered by accident insurance.  Minor Compliance	YES	The Mill and Estates provide medical care and insurance coverage for all the workers. Random records checked confirmed that Local Workers were covered by SOCSO and Foreign workers were provided with group insurance as required under the Workmen Compensation Act 1992.
	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 LTA. 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.
C 4.8 All staff, workers, smallholders and contract workers are appropriately	4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO P&C that includes regular assessments of training needs and documentation of the programme. Major Compliance	YES	Formal training programs for 2018/19 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.
trained.	4.8.2	Records of training for each employee shall be maintained.  Minor Compliance	YES	Lavang 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. 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	5.1.1	An EIA shall be doc. Major Compliance	YES	The EIA as detailed in the estates register covers all estates activities/operations. The latest register being reviewed July 2018 to include the changes and continued being formalized for 2018/19. Documents are maintained, sighted and verified.
management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented	5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be dev. & and implemented within a comprehensive action plan. The action plan shall identify the responsible person. 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 established and maintained accordingly. 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.
and monitored, to demonstrate continual improvement.	5.1.3	This plan shall incorporate a monitoring protocol, adaptive to op 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 env. impacts.MinorCompliance	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 is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. Pollution prevention plan and waste management plan was reviewed on yearly basis and was verified at all visited operating units. Sighted and extracted the following environmental management plan for 2017/18. FY2017/18 performance was verified and noted to be satisfactory. The monitoring was also recorded during the PMU/agronomist visits in their reports. The plans were reviewed monthly during the operations, monthly and the Regional meetings.
C 5.2 The status of rare, threatened or endangered species other High Conservation Value habitats, if any, that exist in the	5.2.1	Information shall be collated in a HCV assessment that incl. both the planted area itself and relevant wider landscapelevel considerations.  Major Compliance	YES	SOU Lavang Pekaka has reviewed their HCV with new assessment conducted on June 2017. The new HCV assessment titled 'HCV Assessment For Sarawak Zone which included both the planted area and relevant wider landscape-level considerations with villages and forest reserved. Based on the HCV assessment report, the total area of HCV area for SOU Lavang Pekaka is 354.07ha HCV area.

Clause		Indicators	Comply Yes/No	Findings
plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.	5.2.2	Where RTE species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan.  Major Compliance	YES	The HCV Assessment report indicated that there is no RTE species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird sighted. The appropriate measures that were expected to maintain and/or enhance them were implemented through an action plan dated in July-Oct 2018.
	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	Although there was no RTE species found in the CU, Sime Darby still established their own disciplinary measures if any of their staff or workers found to capture, harm, collect or kill the RTE species. If found any activities to capture, harm, collect or kill RTE species, the estates will make a report to the Sarawak Wildlife Department immediately. In all estates, the training programs for 2018/2019 has included HCV training programme.
	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 & reported; Outcomes of monitoring shall be fed back into the action plan. Minor Compliance	YES	Progress of implementation of the action plans 'HCV Action Plan (continuous) for FY: 2018/2019' for all Estates were reviewed and verified on the ground. No RTE species were found within the estates area. Noted the CU had continued to implement planned actions such as awareness to the staffs and public on enhancing biodiversity, posting of relevant information in the Sime Darby webpage and erection of signage at strategically locations.
	5.2.5	Where HCV set-asides with existing rights of local	YES	SOU Lavang Pekaka has reviewed their HCV with new assessment conducted on June 2017. The new HCV assessment titled 'HCV Assessment For Sarawak Zone which included both the planted area and relevant

Clause		Indicators	Comply Yes/No	Findings
		communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. Minor Compliance		wider landscape-level considerations with villages and forest reserved. Based on the HCV assessment report, there is only HCV 4 declared in SOU Lavang with total area of 354.07ha.
C 5.3 Waste is reduced, recycled, re-used, and disposed of in an environmentally	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.
and socially responsible manner.	5.3.2	All chemicals and their containers shall be disposed of responsibly.  Major Compliance	YES	Lavang & Pekaka SOU adopted the guidelines provided by the Agriculture Department on the empty chemicals containers management. All empty chemical containers in all estates and mill were triple rinsed, and disposed through approved licensed contractor.
	5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.  Minor Compliance	YES	Waste management and disposal plan available.
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	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.
C 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice	5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003.  Major Compliance	YES	The use of fire for waste disposal and for preparing land for oil palm cultivation or replanting was not practiced in all estates. From field visits (2016, 2017 & 2018 Replants) and interviews with the workers there is no open burning being practiced in the estates.
	5.5.2	Where fire has been used	YES	There was no evidence that fire had been used to prepare land for replanting in all estates. No fire was used

Clause		Indicators	Comply Yes/No	Findings
		for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003.  Minor Compliance		for waste disposal.
C 5.6 Preamble Growers and millers commit to reporting on operational greenhouse gas	5.6.1	An assessment of all polluting activities shall be conducted, incl. gaseous emissions, particulate / soot emissions and effluent.	YES	An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records which covers estate and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' – is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly.
emissions. However, it is recognised that these significant emissions cannot be monitored completely or	5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented.  Major Compliance	YES	Lavang & Pekaka SOU had identified emission of GHG from their operations such as emission from their farm tractor and gen set operation. The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment., Fuel Consumption, Peat Oxidation, POME and reported in the PalmGHG Summary Report.
measured accurately with current knowledge and methodology. It is also recognised that it is not always	5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions	YES	SOU Lavang has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. Below are the summary of result:  Summary of Net GHG Emissions  Emissions per Product tCO2e/tProduct
feasible or practical to reduce or minimise these emissions.		from estate and mill operations, using appropriate tools. Minor Compliance		CPO
Growers and millers commit to an implementation period until the end of December 2016				Production         t/yr           FFB Processed         302289.41           CPO Produced         61599.73
for promoting best practices in reporting to the				Land Use         ha           OP planted area         20984.45           OP planted on peat         4190.6033

Clause	Indicators	Comply Yes/No				Fin	dings				
RSPO, and				rvation (for				0			
thereafter to public			Conse	rvation (nor	n-forested)			0			
reporting. Growers			Total					25,	175.053		
and millers make											
this commitment											
with the support of			Summary of Field Em			_					
all other stakeholder				Own Crop		Group		3rd Party		Total	1000 /FED
groups of the				tCO2e	tCO2e/tFFE	tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB
RSPO.			Emissions								
Plans to reduce pollution and			Land Conversion	101574.8	0.66	81634.95	0.58	C	0		0 0
emissions, including greenhouse gases, are developed,			*CO2 Emissions from Fertiliser	10182.2	0.07	8552.69	0.06	C	0		0 0
implemented and monitored.			**N2O Emissions	34642.55	0.22	14875.66	0.1	C	0		0 0
			Fuel Consumption	1947.22	0.01	4148.25	0.03	C	0		0 0
			Peat Oxidation	162168.46	1.05	61947.02	0.44	C	0		0 0
			Sinks								
			Crop Sequestration	-94423	-0.61	-77379.1	-0.55	C	0		0 0
			Conservation Sequestration	0	C	0	0	C	0		0 0
			Total	216092.23	1.4	93779.47	0.66	8693.14	0		0 0
			Summary of Mill Emi				tCO2e	tCo	2e/tFFB		
				Emissions							
				POME				959.77		.12	
			<u> </u>	Fuel Consu	mption		33	337.41	0	.01	
				Grid Electri Credits	city Utilisatio	ori	1	U		U	
					rid Electricit	V	+	0		0	
				Sales of PK		y	+	0		0	
				Sales of EF				0		Ö	
				Total			382	297.18	0	.13	

Palm Oil Mill Effluent (POME) Treatment Divert to compost Divert to anaerobic digestion  POME Diverted to Anaerobic Digestion: Divert to anaerobic pond Divert to methane capture (flering) Divert to methane capture (flering) Divert to methane capture (electricity generation) Pekaka Oil Mill Pekaka Oil Mill was closed down in 2018, due to merging of the two CUs. This should be the last reporting for Pekaka Oil Mill.  Summary of net GHG emissions from PalmGHG calculator Please indicate PalmGHG calculation option used: Option 1 / Option-2  Summary of Net GHG Emissions Emissions per Product CPO 3.8 Extraction % DER 118.61 RER 16.13  Production   Myr FFB Processed   \$204.74 CPO Produced   1772.84  Land Use   ha   OP planted area   10624.69 OP planted area   10624.69 OP planted on peat   1212.9931 Conservation (forested)   O   Oncorrevation (forested)   O   Occurrection   Occurrectio	Clause	Indicators	Comply Yes/No	Findings
Divert to compost Diver to anaerobic digestion  POME Diverted to Anaerobic Digestion: Divert to methane capture (maining) Divert to methan				Palm Oil Mill Effluent (POME) Treatment
POME Diverted to Anaerobic Digestion:  Divert to anaerobic pond [100%] Divert to methane capture (learing) 0% Divert to methane capture (learning) 0% Divert to methane capture (electricity generation)  Pekaka Oil Mill Pekaka Oil Mill was closed down in 2018, due to merging of the two CUs. This should be the last reporting for Pekaka Oil Mill.  Summary of net GHG emissions from PalmGHG calculator Please Indicate PalmGHG calculation option used: Option 1 / Option-2  Summary of Net GHG Emissions  Emissions per Product kCO2e/Product CPO 3.8 PK 3.8  Extraction % OER 18.61 KER 6.13  Production by FFB Processed 920-474 CPO Produced 1712.84  Land Use has 0P planted area 10624.69 OP planted on peat 1212.9931 Conservation (forested) 0				Divert to compost 0%
Divert to anaerobic pond Divert to methane capture (electricity generation)  Pekaka Oil Mill Pekaka Oil Mill was closed down in 2018, due to merging of the two CUs. This should be the last reporting for Pekaka Oil Mill.  Summary of net GHG emissions from PalmGHG calculator Please indicate PalmGHG calculation option used: Option 1 / Option 2  Summary of Net GHG Emissions  Emissions Emissions PR  3.8  Extraction OER 18.61 KER 16.13  Production FFB Processed 9204.74 CPO Produced 1712.84  Land Use OP planted area OP planted area OP planted on peat 1212.9931 Conservation (forested) O conservation (forested) O conservation (forested)				Divert to anaerobic digestion 100%
Divert to anaerobic pond Divert to methane capture (electricity generation)  Pekaka Oil Mill Pekaka Oil Mill was closed down in 2018, due to merging of the two CUs. This should be the last reporting for Pekaka Oil Mill.  Summary of net GHG emissions from PalmGHG calculator Please indicate PalmGHG calculation option used: Option 1 / Option 2  Summary of Net GHG Emissions  Emissions Emissions PR  3.8  Extraction OER 18.61 KER 16.13  Production FFB Processed 9204.74 CPO Produced 1712.84  Land Use OP planted area OP planted area OP planted on peat 1212.9931 Conservation (forested) O conservation (forested) O conservation (forested)				POME Diverted to Angerobic Digestion:
Divert to methane capture (flaring)   0%   Divert to methane capture (lectricity generation)   0%   20				
Divert to methane capture (electricity generation)   Pekaka Oil Mill				
Pekaka Oil Mill   Summary of net GHG emissions from PalmGHG calculator   Please indicate PalmGHG calculation option used: Option 1 / Option-2				Divine the month and a comption (all activities
Pekaka Oil Mill was closed down in 2018, due to merging of the two CUs. This should be the last reporting for Pekaka Oil Mill.  Summary of net GHG emissions from PalmGHG calculator Please indicate PalmGHG calculation option used: Option 1 / Option-2  Summary of Net GHG Emissions  Emissions per Product   tCO2e/tProduct   CPO   3.8   PK   3.8    Extraction   %   00   OER   18.61   KER   16.13    Production   ttyr   FFB Processed   9204.74   CPO Produced   1712.84    Land Use   Na   OP planted area   10624.69   OP planted on peat   1212.9931   Conservation (forested)   0   Conservation (forested)   0				
Pekaka Oil Mill was closed down in 2018, due to merging of the two CUs. This should be the last reporting for Pekaka Oil Mill.  Summary of net GHG emissions from PalmGHG calculator Please indicate PalmGHG calculation option used: Option 1 / Option-2  Summary of Net GHG Emissions  Emissions per Product   tCO2e/tProduct   CPO   3.8   PK   3.8    Extraction   %   00   OER   18.61   KER   16.13    Production   ttyr   FFB Processed   9204.74   CPO Produced   1712.84    Land Use   Na   OP planted area   10624.69   OP planted on peat   1212.9931   Conservation (forested)   0   Conservation (forested)   0				
for Pekaka Oil Mill.  Summary of net GHG emissions from PalmGHG calculator Please indicate PalmGHG calculation option used: Option 1 / Option-2  Summary of Net GHG Emissions  Emissions per Product CPO 3.8 PK 3.8  Extraction % OER 18.61 KER 6.13  Production Vyr FFB Processed 9204.74 CPO Produced 17712.84  Land Use ha OP planted area 10624.69 OP planted on peat 1212.9931 Conservation (non-forested) 0				
Summary of net GHG emissions from PalmGHG calculator				Pekaka Oil Mill was closed down in 2018, due to merging of the two CUs. This should be the last reporting
Please indicate PalmGHG calculation option used: Option 1 / Option-2				for Pekaka Oil Mill.
Please indicate PalmGHG calculation option used: Option 1 / Option-2				Summary of not GHC emissions from PalmGHC calculator
Summary of Net GHG Emissions   Emissions per Product   tCO2e/tProduct   CPO   3.8   PK   3.8				Please indicate PalmGHG calculation ontion used: Ontion 1 / Ontion 2
Emissions per Product   CO2e/tProduct   CPO   3.8   PK   3.8				riedse indicate i aimorio calculation option used. Option 17 option 2
CPO   3.8   PK   3.8				
Extraction   %				
Extraction   %				
DER   18.61				PK [3.8
DER   18.61				Extraction %
Froduction   t/yr     FFB Processed   9204.74     CPO Produced   1712.84     Land Use   ha     OP planted area   10624.69     OP planted on peat   1212.9931     Conservation (forested)   0     Conservation (non-forested)   0     Conservation (n				
Production         t/yr           FFB Processed         9204.74           CPO Produced         1712.84           Land Use         ha           OP planted area         10624.69           OP planted on peat         1212.9931           Conservation (forested)         0           Conservation (non-forested)         0				
FFB Processed   9204.74     CPO Produced   1712.84				
FFB Processed   9204.74     CPO Produced   1712.84				Production t/yr
Land Use         ha           OP planted area         10624.69           OP planted on peat         1212.9931           Conservation (forested)         0           Conservation (non-forested)         0				FFB Processed 9204.74
OP planted area       10624.69         OP planted on peat       1212.9931         Conservation (forested)       0         Conservation (non-forested)       0				CPO Produced 1712.84
OP planted area       10624.69         OP planted on peat       1212.9931         Conservation (forested)       0         Conservation (non-forested)       0				
OP planted on peat 1212.9931 Conservation (forested) 0 Conservation (non-forested) 0				
Conservation (forested) 0 Conservation (non-forested) 0				
Conservation (non-forested) 0				
Total 0				
Iotal				Conservation (non-torested) U
				Total

Clause	Indicators	Comply Yes/No					Fi	ndings				
			<u>Su</u>	mmary of Field E			T_					
					Own Crop		Group		3rd Party		Total	
					tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFE	3tCO2e	tCO2e/tFFB
				Emissions								
				Land Conversion	5710.24	0.58	0	0	0	0	0	0
				*CO2 Emissions from Fertiliser	591.56	0.06	0	0	0	0	0	0
				**N2O Emissions	1075.7	0.11	0	0	0	0	0	0
				Fuel Consumption	320.45	0.03	0	0	0	0	0	0
				Peat Oxidation	4128.43	0.44	0	0	0	0	0	0
				Sinks								
				Crop Sequestration	-5412.54	-0.55	0	0	0	0	0	0
				Conservation Sequestration	0	0	0	0	0	0	0	0
				Total	6413.84	0.66	0	0	0	0	0	0
			Su	mmary of Mill Em	issions a	nd Credits						
					Emission			tCO2e	tCo	o2e/tFFB		
					Emission: POME	•		1804.28	0.	2		
					Fuel Cons	umption		427.79	0.			
					Grid Electr	icity Utilisation	on	0	0			
					Credits							
					Export of C Sales of P	Grid Electricit	У	0	0			
					Sales of E	FB		0	0			
					Total	· <del>-</del>		2232.07	0.2	24		

Clause	Indicators	Comply Yes/No	Findings
			Palm Oil Mill Effluent (POME) Treatment
			Divert to compost 0%
			Divert to anaerobic digestion 100%
			POME Diverted to Anaerobic Digestion:
			Divert to anaerobic pond 100%
			Divert to methane capture (flaring) 0%
			Divert to methane capture (electricity generation) 0%

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

Clause		Indicators	Comply Yes/No	Findings
C 6.1 Aspects of plantation and mill management	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented.  Major Compliance	Yes	The CU retained its documented SIA, including records of meetings. The information of SIA contained in updated "Social Impact Assessment (SIA) Report, SOU 34 Lavang Pekaka, 26-29/9/18" report. The assessment covered all units in the CU. Attendance list identified that the assessment had been participated by various stakeholders, e.g. workers, surrounding communities, tenants, employees, school, contractor / suppliers. Minute of meeting was available.
that have social impacts, including replanting, are	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	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, workers, surrounding communities, tenants, employees, school, contractor / suppliers. Interviewed with the affected parties confirmed the assessment has been done with their participation.
identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made,	6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.Major Compliance	Yes	The CU observed maintained established and implemented SIA action plan. Issues and action plans were evident.
implemented and monitored, to demonstrate continual improvement.	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	Yes	The CU noted practices to review SIA plan at least annually. The latest review was in Sept 2018.

Clause		Indicators	Comply Yes/No	Findings
		includes the participation of affected parties.Minor Compliance		
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	Yes	No smallholders included in the CU. All certified units are the CU own supply bases.
C 6.2 There are open and	6.2.1	Consultation and communication procedures shall be documented. Major Compliance	Yes	The CU noted maintained documented consultation and communication procedures i.e. Procedure for External Communication with stakeholders.
transparent methods for communication and	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. The appointment letter issued by each manager of operating unit. Generally, the appointment is for two years period and thereafter, unless there is change of person assigned.
consultation between growers and/or millers, local communities and other affected or interested parties	6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. Minor Compliance	Yes	The CU continued to maintain a documented list of stakeholders. Among of stakeholders identified were surrounding communities, tenants, suppliers, contractors, government agencies. The list also contained the relevant name of person, address and phone number. Latest stakeholders meeting was conducted in Sept 2018 for whole SOU.
C 6.3 There is a mutually agreed and documented system for dealing with	6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. Major Compliance	Yes	The system used by the SOU Lavang Pekaka in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Tatacara Perundingan Dalam Menangani Masalah Sosial". The Mill and Estates within SOU Lavang Pekaka each have its own Internal Complaint Book and External Communication Book. The Internal Complaint Book is used for employees to lodge complaint pertaining to their houses. The external book was reviewed and found no complaints against the CU.
complaints and grievances, which is implemented and accepted by all affected parties	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance	Yes	It was observed that no complaint or dispute was received from affected parties. Stakeholder consultation minute was reviewed, and observed no complaint or dispute raised by stakeholders.
C 6.4 Any negotiations concerning compensation	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. The procedure maintained as documented. The procedure stipulates that workers issues be handled by each operating unit, and will be escalated up if not resolved. Nevertheless, no significant issues related to employee was observed. Meantime, land issues will be handled by the Land Management Department, at Head

Clause	Indicators		Comply Yes/No	Findings
for loss of legal,				Office, if any. Both employee and land issues processes include negotiation procedures, calculation and distribution of compensation to affected parties.
customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own	6.4.2	A procedure for calculating and distributing fair compensation shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.  This proc. shall take into account: gender differences in the power to claim rights, ownership & access to land; differences of transmigrants & long-established communities; & differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance	Yes	In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office.
representative institutions.	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	6.5.1	Documentation of pay and conditions shall be available.  Major Compliance	No	Documentation of pay and conditions noted maintained available. However, there was pay to employees for wages documented on the pay slips could not be confirmed met legal requirement. There were wages (such as overtime, rest day, public day) for few employees on Sept 2018 had not met legal requirement. Thus Major NCR HO1 is issued.
minimum standards and are sufficient to provide decent living	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	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. Evidence of employment contracts reviewed as well as interviewed with employees confirmed the stipulated

Classes		lu dia stana	Comply	Pio dio co
Clause		Indicators	Yes/No	Findings
wages		the workers or explained carefully to them by a management official. Major Compliance		conditions of employment as above.
	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 observed provide adequate housing, water and electricity, medical, welfare amenities such as Nursery for Estate Toddlers (NEST), Community Learning Centre (CLC), community hall etc., which met applicable law. Interviewed with workers acknowledged that there were no complaints with regards to this, and request for house and amenities repair were attended accordingly. Houses observed were in good conditions, and requests for repairs were attended to in a timely manner. The above amenities noted provided for free.
	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 observed monitor price of sundry goods at the shops in each estate. Each shop submitted their price list of goods to management, and price of goods were observed 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	6.6.1	A published statement in local languages recognising freedom of association shall be available.  Major Compliance	Yes	The CU maintained policy for recognizing freedom of association. The policy displayed at each operating unit office.
personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent	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, Town Hall 6.0 meeting, etc. Attendance and minutes of meetings with workers representative were retained and available.

Clause		Indicators	Comply Yes/No	Findings
and free association and bargaining for all such personnel.				
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 (i.e. below 18 years old) was observed.
C 6.8 Any form of discrimination based on race, caste, national origin, religion,	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.  Major Compliance	Yes	The equal opportunities policy is contained within the Sime Darby Social Policy. The policy states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Social Policy was exhibited on notice boards in both Bahasa Malaysia and English. No discrimination was observed.
disability, gender, sexual orientation, union membership, political	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.
affiliation, or age, is prohibited.	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,	6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. Major Compliance	Yes	The 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.
and reproductive rights are protected.	6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.  Major Compliance  A specific grievance mechanism	Yes	The CU has established policy concerning protecting reproductive rights. The CU also maintained to have meeting covering matter related to protecting reproductive rights. Latest minute of meeting was reviewed. However, no case was observed. Interviewed with women employees confirmed they aware of their reproductive right and confirmed no issue.  The CU maintained grievance mechanism which, respects anonymity and protects complainants.

Clause		Indicators	Comply Yes/No	Findings
		which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.  Minor Compliance		However, no case was observed. The CU practice to highlight and remind to their employees about company policies, including about grievance mechanism during morning muster.
C 6.10 Growers and millers deal	6.10.1	Current and past prices paid for FFB shall be publicly available. Minor Compliance	Yes	Current price observed displayed at weighbridge. Noted since May 2018 onward, the mill received external FFB. The price quote was based as per MPOB monthly price.
fairly and 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. Major Compliance	Yes	External FFB suppliers were informed and explained on information pertaining to the price mechanism. 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	Suppliers and contractor observed 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	Suppliers and contractor observed understand and satisfied with their business relationship with the CU, including their payment.
C 6.11 Growers and millers contribute to local	6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. Minor Compliance	Yes	The CU noted had contributed to local communities based on their request.
Sustainable development where appropriate.	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.
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.

Clause		Indicators Comply Yes/No		Findings
	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. The CU practice to highlight and remind to their employees about company policies, including about respect human right during morning muster.
	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 centralized Community Learning Centre (CLC) in the CU.

### Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Lavang CU has no plan for any new planting and no new development of area was observed during the visit. Auditors has verified through checking the <a href="https://www.globalforestwatch.com">www.globalforestwatch.com</a>, GOOGLE Maps, Estate Maps and also through site visit to all four estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at SOU Lavang Pekaka. 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: Major Compliance		
	a)	Reduction in use of pesticides(Criterion 4.6);	Yes	SOU Lavang Pekaka adopted several continuous improvements 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.  a) The CU also adopted planting of <i>Legominious</i> Cover Crop mainly <i>Pueraria Javanica</i> and <i>Calopogonium Mucunoides</i> at replanting area to minimize circle and selective weeding.  b) <i>Neproliphis biserata</i> was maintained and encouraged to be planted in Lavang 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.  c) Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced encouraging soft grasses in inter row and frond stacking area  d) Mills waste such as EFB were used as fertilizer in the field.
	b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	Yes	Environmental impact assessment, management action plans and continuous improvement plan for SOU Lavang Pekaka 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 SOU Lavang Pekaka 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.

e)	Social impacts (Criterion 6.1);	Yes	The CU continued to improve the social impacts, such as improvement related to:  a) housing and amenities condition.
			b) access and facilities for education. c) welfare of workers
			d) relationship with local communities and other stakeholders.
f)	Encourage optimizing the yield of the supply base	Yes	As Pekaka/Lavang SOUs are part of a well-established organisation, Sime Darby Plantations Berhad, the yield performance has always been the top priority in ensuring long-term economic and financial viability. In general, various efforts had been done to optimise the yield of the plantation such as maximising crop recovery, optimum ripeness standard (harvest ripe bunches only and 100% loose fruit collection), the soil fertility were maintained and planting only high yielding planting material.

# RSPO Certifications Systems for Principles & Criteria June 2017

Clause	lı	ndicators	Comply Yes/No	Fir	Findings					
4.5.3 Time-bound plan	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining	YES			sian Operations is in progress to Time Bound Plan as at Decem		Us from		
Time Sound plan		RSPO membership. Any new acquisitions		No	Name of SOU	Name of Units	Time Bound Plan			
Note:		shall be certified within a 3-year timeframe.			DT O'co a la da A coa	East	0040			
Where there are isolated		Any deviations from these maximum			PT Sime Indo Agro	Sei Mawang	2019			
lapses in 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					3	PT Bersama Sejahtera Sakti	KKPA BSS	2019		
shall be raised. Where there is evidence of				4	PT Bahari Gembira Ria	Plasma BGR	2020			
fundamental failure to proceed with				5	PT Guthrie Pecconina Indonesia	Sungai Jernih Estate and GPP KKPA	2017			
implementation of the					PT Mitra Austral Sejahtera (MAS)	MAS 1	2019			
plan, a major non-						MAS 2	2019			
compliance shall be				6		MAS 3	2019			
raised;						Mas Factory	2019			
						Plasma MAS	2020			
					DT C III N . D .	Karya Palma	2018			
				'	PT Sandika Nata Palma	KKPA SNP	2020			
						Pelanjau (PT BAL)	2018			
				8	PT Budidaya Agro Lestari	Sungai Putih (PT BAL)	2018			
						Beturus (PT BAL)	2018			

						ŀ	KKPA BAL	2020	
					I	<u> </u>			I
	(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 s rame of three yea		uncertified SOUs was approp certification.	riate and within the	
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	YES	2017.		d plan was re	bound plan for 8 new/uncer evised and endorsed by the		
4.5.4	(a)	No replacement of primary forest or any	YES	The s		ified SOUs th	rough Mutuagung Assessme		
Requirements for		area required to maintain or enhance HCVs in accordance with RSPO P&C		No	Name of SOU	Name of Units	Replacement of primary for new plant		
uncertified management units:		criterion 7.3. Any new plantings since 1st January 2010 shall comply with the		1	PT Sime Indo Agro	East Sei Mawang	No new planting since Novemb	per 2005.	
		RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be		2	PT Ladangrumpun Suburabadi	Subur Abadi Plasma 1	Smallholder project – SAF certification by 2019	-	
		verified by an RSPO accredited CB;		3	PT Bersama Sejahtera Sakti	KKPA BSS	New smallholder project - targeted for Certification by 20	19	
				4	PT Bahari Gembira Ria	Plasma BGR	Smallholder Project – socializ the Koperasi Unit Desa (KUD)		
				5	PT Guthrie Pecconina Indonesia	Sungai Jernih Estate and	The Certificate Holder has seand LUCA for PT GPI and Compensation.		

					GPP KKPA	
					MAS 1	HCV assessment was conducted in March 2009. A
					MAS 2	disclosure of liability including LUCA analysis sent to
				PT Mitra	MAS 3	RSPO Secretariat on 24 June 2016 and expected to
			6	Austral Sejahtera (MAS)	Mas	submit final LUCA to RSPO Secretariat office by end
					Factory	Dec 2017.
				(IVII (O)	Plasma	
					MAS	
			1_ 1	PT Sandika	Karya	There was a new planting area in the estate. Need
			7	Nata Palma	Palma KKPA SNP	to submit NPP.
						No new planting activities
					Pelanjau (PT BAL)	No new planting activities.
				-	Sungai	
				PT Budidaya	Putih (PT	
			8	Agro Lestari	BAL) `	
					Baturus	There was a new planting area in the estate. Need
				-	(PT BAL)	to submit NPP.
					i i	No new planting activities.
(b)	Land conflicts, if any, are being	YES				ough Mutuagung Assessment Report were as follows:
	resolved through a mutually agreed		No	Name of SOU	Name of Units	Land conflicts
	process, such as the RSPO Complaints				East	East Estate does not have existing land conflicts with
	System or Dispute Settlement Facility, in		1	PT Sime Indo	Sei Mawang	
	accordance with RSPO P&C criteria 2.2,			Agro	Conmanang	process of legality under the purview of the Ministry of
	6.4, 7.5 and 7.6;			ŭ		Forestry, Indonesia.
				PT	Subur Abadi	Smallholder project – SAP 1. No land conflict.
			2	Ladangrumpun Suburabadi	Plasma 1	
				PT Bersama	KKPA BSS	New smallholder project - KKPA Maju Bersama. No land
			3	Sejahtera Sakti	KKI A BOO	conflict.
			4	PT Bahari	Plasma	Smallholder Project. No land conflict.
			4	Gembira Ria	BGR	·
				PT Guthrie	Sungai	Still in process to get certificate of land use right. Head
			5	Pecconina	Jernih	of Musi Banyuasin District concerning the Granting of
				Indonesia	Estate and GPP KKPA	Plantation Business License of PT Guthrie dated 25 Feb 2010.
			-		MAS 1	There are land conflict. Sime Darby Plantation is
					MAS 2	submitting quarterly progress report to RSPO. The latest
				PT Mitra Austral	MAS 3	report was submitted on 18 Dec 2017. The details of the
			6	Sejahtera (MAS)	Mas Factory	case is available on RSPO Website
					Plasma	https://www.rspo.org/members/comp laints/status-of-
					MAS	complaints/view/29
			7	PT Sandika	Karya Palma	No land conflict.
				Nata Palma	KKPA SNP	

			8 PT Budidaya Agro Lestari Sungai Putih (PT BAL)  Sungai Putih (PT BAL)  Beturus (PT BAL)  KKPA BAL
(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	YES	Based on the internal audit report, there were no labour dispute that are not being resolve through an agreed process for all uncertified units for all 8 uncertified units of Sime Dark Plantation Sdn Bhd - Indonesia as at December 2017.
(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	There was legal non-compliance on land title for 5 uncertified SOUs as listed below. These PTs waiting for land title process; PT Sime Indo Agro 1,652 Ha, PT Bersama Sejahtera Sakti 765 Ha, PT Bahari Gembira Ria 1,639 Ha, PT Guthrie Pecconina Indonesia 4,133 Ha and PT Budidaya Agro Lestari. PT Mitra Austral Sejahtera was in progress to close non-compliances in relation to legal requirements as raised during Internal Audit Nov 2017.
(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 4.5.4 (a) – (d) above by the audit team based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		
	A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement;	YES	The status of 8 uncertified SOUs through Mutuagung Assessment Report were as follows:    No

		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 Preassessment 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.
		4	PT Bahari Gembira Ria	Plasma BGR	Confirmation of the status is in progress. Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Land Use Change Analysis has been completed for Plasma BGR.  Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servle t.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P9000001OioYJEAZ https://rspo.secure.force.com/membership/servlet/servle t.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P9000001OioXDEAZ https://rspo.secure.force.com/membership%2Fapex%2FRSPOCertSearch&file=00P9000001OioXDEAZ
		5	PT Guthrie Pecconina Indonesia	Sungai Jernih Estate and GPI KKPA	Sungai Jernih Estate and GPI KKPA were audited by Mutuagung as verified through Recertification Audit report. The assessment was conducted on 15 – 20 May 2017.

			6	PT Mitra Austral Sejahtera (MAS)	MAS 1 MAS 2 MAS 3 Mas Factory Plasma MAS	Internal assessment was conducted on 9 - 10 Nov 2017 by PSQM Indonesia.
			7	PT Sandika Nata Palma	Karya Palma KKPA SNP	Internal assessment was conducted on 10 Feb 2017.
			8	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Sungai Putih (PT BAL) Beturus (PT BAL) KKPA BAL	Internal assessment was conducted on 18 - 23 Sept 2016. This PT also has conducted Stage 1 audit on RSPO Certification System, P&C RSPO (2016) and RSPO Supply Chain Certification Standard on 17 - 22 April 2017.  Smallholder project – targeted for certification by 2020.
	Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.	YES		gung Lestari had through the Mutua	conducted the	consultation with relevant NGO's as verified by audit
	Desktop study e.g. web check on relevant complaints	YES	Verified through RSPO website: <a href="https://www.rspo.org/members/status-of-complaints/">https://www.rspo.org/members/status-of-complaints/</a>			
	If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any noncompliance with the requirements.	YES				consultation with relevant NGO's and field inspection 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	No additional indicators	YES	inform For Po by Wa then t Hope Decer there SOU I Each	nation as follows: ekaka, Dulang, Pa angsa Mujur Sdn ransfered to Sime Plantations (Sara mber 1985. Based was no such case Lavang Pekaka. estate had legal u	aroh, Lavang S Bhd and Gold Darby after th wak) Sdn Bhd If on the intervious concerning the	of this checklist, SOU Lavang Pekaka land owner Special and Ruai Estate the land was previously owned den Hope Plantations (Sarawak) Sdn Bhd, which was ne merger in 2007. Wangsa Mujur Sdn Bhd and Golden has bought the land from Sarawak Government on 18 views and this audit finding, it has been confirmed that he rights of local communities and indigenous peoples at through an Ownership signed by the Superintendent of g the payment of premium and Land fee.

developed with their free,		
prior and informed		
consent and check		
compliance with the		
specific terms of such		
agreements.		

#### 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
1.1.2 MZK 01 2018	Major	Indicator: 1.1.2 - Records of requests for information and responses shall be maintained  Finding: Records of request and Information regarding Certified Area and CSA (Conservation set aside) was found incorrect.  Objective evidence: The information given to CB regarding Certified Area and CSA (Conservation set aside) at SOU 31 Lavang, SOU 34 Pekaka since 2012 (Refer 2017 report PT Mutuagung Lestari) was not correct due to not tally with stated Land Title and HCV Assessment and SAP System (Internal control Sime Darby) as per information below:  Estate   Area (Since   Land Title as Per Legal   Grant   All   23,595.16   23,642.81   Estate   CSA   Area (Since   CSA Area as per HCV   Assessment report and   SAP System   All   1,093.72   142.41   Estate		Correction: To Reconcile all Figures  Corrective Action Plan: To provide GPS Surveyed Maps and updated hectarage statement to SIRIM	Auditor has received data Area Statement excel and verified the Ha Statement given by the SOU Lavang Pekaka and amended the Certified Area in the report  Status: Closed The implementation of corrective action will be verified by next audit.	
4.3.4 STK- 01.2018	Major	monitored. A documented programme shall be in place.  Finding: Subsidence of peat.  Objective evidence:	t soils was not monitored.  no records to show that subsider	ment	Correction: To produce and to make a new book for peat subsidence data and keep in proper logbook/file.  Corrective Action Plan: To hire and assign a PIC to monitor the peat subsidence level and report to Manager for verification.	- Auditor has received and verified SOP for peat subsidence monitoring, map of peat gauge subsidence, Appointment letter of PIC in charge to take the reading, and records of monitoring of Peat subsidence.  Status: Closed The implementation of corrective action will be verified by next audit.

4.6.7 AB 01 - 2018	Minor	Requirement: 4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts.  Finding: The Standard operating procedure (SOP) of pesticides /chemical application is not being adhered to.  Objective evidence: Pekaka Estate – Field no P92 PB. Spraying works using KENLON.  Sprayers carrying the chemicals individually attached to the chemicals pumps and self-mixing for application, instead of the bulk pre-mixing method.  Sprayers were not using goggles though being provided as PPE.	Correction: To repair the tractor used for chemical transportation. To assign manpower for monitoring usage of PPE  Corrective Action Plan: To retrain all chemical handlers on the SOP of chemical handling. To use form for monitoring PPE	Corrective action Plan accepted. The implementation of corrective action plan will be verified by next audit.  Status: Open
6.5.1 HO1	Major	Requirement: 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.  Finding: Documentation of pay and conditions noted maintained available. However, there was pay to employees for wages documented on the pay slips could not be confirmed met legal requirement.  Objective evidence: No evidence that pay for wages (such as overtime, rest day, public day) for below employees on September 2018 had met legal requirement. Pekaka Estate: Employee No.: 41869, 111319, 136621, 41981. Paroh Estate: Employee No.: 41444, 104183, 41506, 13144. Lavang Oil Mill: Employee No.: 102826, 42533, 102827. Lavang Special Estate: Employee No.: 117024, 38495, 109541. Ruai Estate: Employee No.: 72094, 133105, 101687, 43003.	Correction:  1. To conduct briefing by HR personnel on the standardization of over time worked to the management teams.  2. To show evidence of payment made/allocated for the workers on approved paid over time.  Corrective Action Plan:  1. To brief workers on the available careline number to report any grievance pertaining to miscalculation of their salary.  2. To conduct briefing by HR personnel on the standardization of pay for over time.	- Sighted evidence of payment of overtime for all workers said has been paid and evidence of calculation of wages at pay slip October 2018 - Sighted evidence briefing has been conduct on 28/10/18 Status: Closed The implementation of corrective action will be verified by next audit.

Attachment 5

### **RSPO SUPPLY CHAIN: AUDIT CHECKLIST**

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

1.	File Reference No.	: ES10170019
2.	Name of facility/ site(s) /entity(ies)	: Sime Darby Plantation (Sarawak) Sdn Bhd – SOU Lavang and SOU Pekaka
3.	Site Location (single site/multisite/Group)	: P.O Box 1288, 97008 Bintulu, Sarawak
4.	SC model	: Mass Balance
5.	Type of entity	: Mill
6.	RSPO Member Number	: 1-0008-04-000-00
7.	Annual summary records of certified oil palm products purchased and	: Projected for last year for period of Oct 17 until Sept 18
	claimed	CPO Projected: 67,920mt
		PK Projected: 18,222mt
		CPO Sell: 58,264.368 mt
		CPO Claim as Mass Balance: 5,600.00mt
		CPO Claim as Non-RSPO: 52,664.37mt
		PK Sell: 14,740.23mt
		PK Claim as Mass Balance: 4,800.00mt
		PK Claim as Non-RSPO: 9,940.23mt

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

	Requirements	Remarks
	Audit Process Requirements – FOR STAGE 2 / RECERTIFICATION A	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.  Audit Process Requirements – SURVEILLANCE AUDIT	N/A as this audit is a 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	Lavang POM had revised their documented procedure title 'Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001', version 2, Issue 4 dated Sept 2018 The procedure described the following:  a) Clause 4.0 ~ the responsibility of for the implementation of RSPO SCC i.e. head of operating unit  b) Clause 5.0 ~ Control of document & records such as weighbridge tickets, consignment note, training record & contracts. Record retention for 10 years. Define the critical control point (CCP) :estate – weighbridge, mill – weighbridge,

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

	Requirements	Remarks
1	Applicability of the general chain of custody requirements for the s	upply chain
1.1	Organization takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors.	Lavang POM has legal ownership and physically handles RSPO certified sustainable crude palm oil and palm kernel.
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 due to Lavang POM is processing facility.
1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform	RSPO Palm Trace Registration no. available.
1.4	Processing aids do not need to be included within an organization's scope of certification.	No processing aid involved in Lavang POM scope of certification
2	Supply chain model	
2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	Lavang POM obtained certified FFB from own certified supply base.
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Lavang POM only apply MB model
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:	Available. The procedure was kept in file RSPO Supply Chain Manual (SCM/RSPO/SD)  Appropriate changes were also made in the change to include the new clause Production volume, Conversion factors, Internal Audit, Complaints and Management Review.
a)	Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	Supply chain procedure was revised September 2018 (revision: 4) The Procedure was sighted and found all elements of the RSPO Supply Chain standard were covered.
b)	Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	Sighted CPO and PK production record, weighbridge report, dispatch record and training record was up to date and well maintained.
c)	Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the	The Assistant Manager have overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Lavang POM. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements.

	implementation of this standard.	
3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization;  i. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.  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.	RSPO internal audit was conducted in July 2018). The internal audit has follow the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents
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 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); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number.  Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).	Lavang POM obtained certified FFB from own certified supply base, Lavang and external supply base.

a)	The site shall have documentation that demonstrate that purchases are made to the material category agreed with their supplier (IP, SG or MB).	To demonstrate that purchases are made to the material category agreed with their supplier, LPOM ensure delivery chit from Lavang, being marked/ stamped accordingly with RSPO cert No. And also outsider estate being marked/ stamped accordingly with 'CSFFB'.
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, Lavang POM update their stock in Palm Trace.
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.	Lavang POM had continued received source of RSPO certified FFB from own group estate. 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.	Lavang POM had started implementing the electronic system 'Simeweigh' to trace the volume of in-coming FFBs from the certified supply bases (estates). Every lorry load of certified FFBs leaving the certified estate was accompanied by a 'card'. On arrival at LPOM, the lorry driver surrendered the 'card' to the Weighbridge Clerk. The 'card' was then scanned and the relevant information on the certified FFBs was then captured and stored in a data base.  On processing, LPOM still referred to the sales contract issued by the Headquarters office for production planning (Refer 8.0 of the SOP – Process Monitoring).  No NCP/ NCD recorded since last audit.
5	Outsourcing activities	
5.1	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard.  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	There are 1 outsource company CPO transporter. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training was sighted.
5.2	manager).  Sites which include outsourcing within the scope of their RSPO Supply	a) 1 outsource company CPO transporter

	Chain certificate shall ensure the following:	b) There is contract document between Lavang POM and the transporters.
	<ul> <li>a) The site has legal ownership of all input material to be included in outsourced processes;</li> <li>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.</li> <li>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</li> </ul>	c) The RSPO Supply Chain procedure has described on outsource activity. d) Inspection was carried out as additional effort to ensure no contamination sighted book at AP Post.
5.3	The site shall record the names and contact details of all contractors used for the processing or production of RSPO certified materials.	List of contact person for both transporters were made available and up-to-date.
5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or production of RSPO certified materials.	No new contractors used for the processing or production of RSPO certified materials.
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;	The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Sime Darby Plantations Berhad and Global Trade Marketing Department (HQ) on behalf of Lavang POM.

1		
	Any related transport documentation;	
	Supply chain certificate number;	
	A unique identification number.	
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 the time of physical shipment as required by the rules set by RSPO.</li> </ul>	Global Trading and Marketing Sime Darby at HQ Ara Damansara are the incharge update the RSPO IT Platform based on input provided by Lavang POM.
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 plan has included the RSPO Supply chain training scheduled in January 2019 for staff & workers.
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.	Training was conducted for workers in Oct 2018 attended by all SOU including personnel from SOU Lavang and SOU Rajawali person including PIC, Clerk, Assistant Engineer, Staff, Weighbridge Operator and Attendance list & photograph was seen.
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.	Sighted CPO and PK delivery note, weighbridge ticket, production data and internal audit records were found up-to-date.
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 was maintained for more than 2 years
9.3	The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume	Available.

	purchased (input) and claimed (output) over a period of twelve (12) months.	
10	Conversion factors	
5.10.1	Where applicable a conversion rate must be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which must be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org). This is in particular relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries. The guidance document for oleochemicals is available on the RSPO website (www.rspo.org).	For Palm Oil Mill; Oil extraction Rate (OER) and Kernel Extraction Rate (KER) has been used as the conversion factor.
10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	Updated on monthly basis.
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.	Relevant information on product claim (including applicable SC model and certificate no.) being correctly indicated in the relevant outgoing paperwork e.g. PK billing, CPO billing, TPOM weighbridge advice ticket and TPOM palm kernel/ CPO delivery note
12	Complaints	
12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Documented procedure has established to address collecting and resolving the complaint.
13	Management review	
13.1	The organization is required to hold management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Documented procedure has defined management review will be conducted once a year. Last conducted in October 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	Management review report, doc. Name Management Review Meeting MSPO & RSPO for Lavang POM Coverage sufficient, among item discussed during audit; - follow up actions from earlier management review -Input & Output - sustainability & adequacy of all SOP's - sustainable agriculture policy

	Recommendations for improvement	- result of internal audit
		- change in legal requirement of any compliance
13.3	The output from the management review shall include any decisions	- complaint (internal & external)
	and actions related to:	- accident & injury (LTA)
		- environmental quality
	Improvement of the effectiveness of the management system and its	- waste management
	processes	- energy usage performance
	Resource needs	- status of corrective actions
		- recommendation for improvement

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

	Module E – CPO Mills: Mass Balance	
E.3	Documented procedures	
E.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:  a) Complete and up to date procedures covering the implementation of all the elements in these requirements;  b) The name 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 procedures for the implementation of this standard.	<ul> <li>a) Lavang POM had revised their documented procedure title 'Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001', version 2, Issue 4 dated Sept 2018 The procedure described the following: <ul> <li>a) Clause 4.0 ~ the responsibility of for the implementation of RSPO SCC i.e. head of operating unit</li> <li>b) Clause 5.0 ~ Control of document &amp; records such as weighbridge tickets, consignment note, training record &amp; contracts. Record retention for 10 years. Define the critical control point (CCP): estate — weighbridge, mill — weighbridge, admin office, ramp, CPO despatch area, CPO storage tank. Kernel silos.</li> <li>c) Clause 6.0 ~ Delivery of FFB from the estate — relevant record involved, flowchart for crop diversion, list of mill and their supply chain model i.e. IP or MB</li> <li>d) Clause 7.0 ~ Receiving FFB at the mill — list of supply base, rules for determining diverted FFB destination, relevant record</li> <li>e) Clause 8.0 ~ process monitoring — for IP model mill need to ensure no mixing of RSPO certified and non-certified</li> <li>f) Clause 9.0 ~ CPO and PK despatch — [Clause 9.1] all delivery of CPO and PK shall be in accordance with the contract allocated by Global Trading &amp; Marketing (GTM) department. [Clause 9.2] Outgoing document for CPO and PK 9e.g. contract, weighbridge ticket / despatch note) shall specify the following information which can be either presented in single document or across a range of document Trade name / RSPO IP, RSPO certificate no.: RSPO 0025,</li> <li>g) Clause 10.0 ~ Non-conforming material / product — requirement to downgrade the RSPO Product</li> </ul> </li> </ul>

		h) Clause 11.0 ~ product claim – shall follow RSPO rules on market communication &
		claim i) Clause 12.0 ~ Outsourced contractor - the mill has established list of outsourced
		contractor. Sighted list of transporter for CPO and PK.
		<ul> <li>j) Clause 13.0 ~ Training – the mill shall provide training for relevant personnel carrying the task at tech critical control point (CCP).</li> </ul>
		<ul> <li>k) Clause 14.0 ~ Reclassification of mill's supply chain model - Reclassification of mill's supply chain model may be determined by GTM/ PSQM. CB shall be notified. All communicated shall be recorded.</li> <li>l) Clause 15.0 ~ Production volume</li> </ul>
		m) Clause 16.0 ~ Conversion Factors
		n) Clause 17.0 ~ Internal Audit
		o) Clause 18.0 ~ Complaints p) Clause 19.0 ~ Management Review
		p) Glause 19.0 • Management Neview
		The procedure was kept in file RSPO Supply Chain Manual (SCM/RSPO/SD) Appropriate changes were also made in the change to include the new clause Production volume, Conversion factors, Internal Audit, Complaints and Management Review.  The procedure was kept in file RSPO Supply Chain Manual (SCM/RSPO/SD) Appropriate changes were also made in the change from the previous Segregation to Identity Preserved model.
		The revised procedure has included the new site of MB which was Derawan POM.
		b) The Assistant Manager have overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Lavang POM. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements.
E.3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	Lavang POM had continued to implement the procedures it had on receiving and processing of RSPO certified and non- certified FFBs. The Weighbridge Clerks knew and kept a list of all certified supply bases (estates) supplying FFBs to Lavang POM and checked on the validity of the estates' P&C Certificates for Sustainable Palm Oil Production (P&C Certificate).
E.4	Purchasing and goods in	
E.4.1	The site shall verify and document the volumes of certified and non-certified FFBs received.	Lavang POM had continued to receive certified FFBs from the CU's own supply bases as well as non-certified FFBs from outsiders. There were ten supply bases (estates) sending certified FFBs to LPOM. They were Lavang, Lavang Special, Kelida, Rasan, Belian, Pekaka, Ruai, Dulang, Paroh, Chartquest Estates. The Weighbridge Clerk checked and verified the consignment notes issued by the supplying estates for the in-coming RSPO and non-RSPO FFBs. LPOM still kept copies of the FFB Consignment Notes or FFB Delivery Notes issued by the supplying estates.

E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	There was no overproduction of certified FFBs at Lavang POM during the period under review (Oct 2017 to Sept 2018).
E.5	Record keeping	
E.5.1	a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and/or three-monthly basis. b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short (i.e. product can be sold before it is in stock.) For further details refer to Module C.	Available.

### Attachment 6

# Status of Non-conformities Previously Identified

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
4.3.5	MINOR	2016.02 (SOU 31) 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  Finding: Drainability assessment was not conducted on replanting field, for example on Field 98C (replanting program 2016) which is 100% peat soil (Estate involve: Lavang Special)	Estate already email and inform R&D (GPS team) to survey and do the drain ability assessment for peat replanting area as soon as possible and come out with the report.  Any replanting on the peat area, R&D will do the drain ability assessment and estate will inform and remind to ensure get better twoway communication to comply with RSPO requirement.	Records showed that a Pilot Trial on "Peat Drainability Assessment" had been conducted in March to May 2018 for SOU 31 & 34. The trial covered Belian, Lavang Special, Dulang, Pekaka and Ruai Estates. Based on this record, past NCR 2016.02 (SOU 31) MINOR was successfully closed Status: Closed
5.2.3	MINOR	2016.04 (SOU 31) Finding: There was not yet evidence of training and another activities in related to educate the workforce (employee) after the HCV/Biodiversity was identified.	To conduct training or other activities for employee in purpose of educate workface to identifying and maintaining HCV/Biodiversity area. To establish and implement HCV training in the Training Plan/Program, review and establish periodically basis.	The training programs for 2018/2019 has included HCV training programme. HCV briefing were carried out on 18/10/18 and 28/5/18 (Pekaka) Paroh on 30/8/18, Lavang Special on 20/10/18 and 20 August 2018 at Ruai Estate. Attendance lists were available. Thus, past NCR 2016.04 (SOU 31) was successfully closed.
5.2.4	MINOR	2016.05 (SOU 31) Finding: The assessment of Biodiversity have been done a week before the RSPO audit and management team still in progress to finalize the report.	To implement all the action plan according to Management Plan in line with the time frame. Establish and implement the standard management plan with details document and evidences, and consistently maintain the Biodiversity / Conservation area.	Progress of implementation of the action plans 'HCV Action Plan (continuous) for FY: 2018/2019 for All Estates were reviewed and verified on the ground. Pekaka has conducted an on-going monitoring of their HCV4 the latest conduct was on 2/10/18, 7/9/18, 1/8/18, 12/7/18,15/6/18, Paroh Estate on 12/10/18, 27/9/18,

				21/8/18, 29/7/18,15/6/18, Lavang Special Estate on 25, 16, 9, 2 /10/18, 24, 17, 11,3/9/18 and for Ruai Estate 1/10/18, 3/9/18, 6/8/18, and 2/7/18. No RTE species were found within the estates area. Noted the CU had continued to implement planned actions such as awareness to the staffs and public on enhancing biodiversity, posting of relevant information in the Sime Darby webpage and erection of signage at strategically locations.  Status: Closed.
2.2.2	MINOR	2016.02 (SOU 34) Finding: Estate's legal boundaries have been marked in the boundary stone map. There are currently 13 boundary stones that been identified in the boundary stone map. During filed visit, sampled boundary stones that are well maintained. This estate connected to own estates Dulang Estate, Gayanis Estate owned by KTS Group, Saremas Estate owned by Wilmar Group, Suai River and Rumah Panjang Edward Tengam. There is no ground verification / census record available to justify regular monitoring being conducted in accordance to documented procedure "Boundaries" page 2 - PT. MUTUAGUNG LESTARI RSPO ASSESSMENT REPORT SPO – 4006a.7Page 74 Prepared by Mutuagung Lestari for Lavang POM – SOU 31 & SOU 34 (Sime Darby Plantation Sdn Bhd)Section B7, bullet e). [Paroh Estate]	To remark of boundary stone with GPS coordinate To ensure of monthly inspection by Field Conductor and recorded	During the audit, the auditor had visited the boundaries of Paroh Estate with Wilmar Group Saremas Estate and Pekaka Estate with WTK Plantation, Takau Sahua and Damai which was a boundary with one another. All the physical markers/Boundary stones along the legal boundaries between was visibly available. Records of monitoring by AP's also has been verified of the Auditor. Status: Closed.
4.7.5	MINOR	2016.04 (SOU 34)  a. According to field observation at Field 92RL that known harvesting foreman was no took first aid kit. [Ruai Estate]  b. In chemical store, the description of items in the first aid box are different from log book. [Pekaka POM]  c. First aid box seen not regularly checked for the availability condition during emergency. [Paroh Estate]	To review back first aid box and monitored every month by Medical Asisstant. To retrain the first aider and Medical Assistant regarding to First aid and Law, and also first aid contains w.	Status:  All mandores were issued a unit each of first aid box. Inventory was maintained for each unit and replenished on weekly basis by the Medical Assistant. All issuance from the box is recorded. During the site visit the mandores were equipped with the first aid

				boxes. Trainings were provided to personnel engaged with the First Aid and MA. With all this practices and records maintained by the estates and mill, the NCR raised during the previous report under indicator 4.7.5 is closed and concluded <b>Status: Closed.</b>
6.3.1	MINOR	2016.05 (SOU 34) Based on the record file, there is no external complaint or feedbacks. As for internal, seen the estate kept a file consisted of request on maintenance issues. However, the "Surat Aduan Kerosakan Perumahan" not recorded of dates of complaint and responded. This not allows to track whether the action taken to complaints been responded within stipulated time frame. [Paroh Estate] [Ruai Estate]	To check and verify back the complaint book To conduct training and monitored regarding to complain and respond procedure.	Auditor has verified the "Surat Aduan Kerosakan Perumahan" and also the Buku Aduan, the dates of complaint and date of responded has been record accordingly, Training also has been conduct on 28/10/18 regarding how to lodge a complaint at all Estate. Thus past NCR 2016.05 (SOU 34) has been closed.  Status: Closed.
4.4.1	MINOR	During the audit verification at Dulang Estate, sighted the document of water sample had been send to the R and D unit at Carey Island dated 6th April 2017 however the sample had been rejected. The unit management unable to show the water analysis result for year 2017 regarding the clean access water consumption for the local stakeholders	To conduct water sampling analysis frequency as per Sustainable Plantation Management System (SPMS) appendix7.  To make schedule taking water sampling, appoint the person in charge on the water sampling and establish location map of sampling point.	Records showed that water quality was being tested at quarterly intervals. Results were sighted and showed no adverse quality affected by the estates operations. Results of water analysis is shown at indicator 4.4.1.  Status: Closed.
5.3.3	MINOR	2017.02.  During the field verification at landfill area P94DB in Dulang Estate, it was found that the waste segregation has not been implemented. It is contradict with the SOP company, Sime Darby Quality Plantation Quality Management system Appendix 9, Procedure of Handling of Domestic Waste "all domestic waste produced at the line-sites and offices of offices and mill area to be separated for recycling and regular hauling according to domestic waste management procedure".	Ldg Dulang to get quotation and tender from third party recycle center in Bintulu area to collect recycle waste and improve on the solid waste minimization.  Operation management to conduct awareness on the waste management and include in the training management plan every yearly.	Rubbish bin has been provided at designated area to ensure proper solid waste disposal. The landfill area was located at least more than 100m from water bodies and 400m from housing complexs. The landfill area also was covered with 15-30cm of soil to prevent fire, litering and odour. Sighted regular collection of domestic waste (2-3 times per week).

RSPO P&C PUBLIC SUMMARY REPORT				
		There was no evidence that domestic waste has been burned. For recycle items such as bottle, tyres, etc has been reused as a items for landscaping. All empty pesticides containers, fertilizer bag, spent oil or grease, etc has been properly manage and disposed through DOE contractor (as per currently SW was store more than 180 days, sighted approval latter from DOE). Thus, previous Minor NCR 2017.02 was satisfactory closed.  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	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).	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

SOU NO		tification Status for Malay  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.

31 32	Lavang Rajawali	Bintulu, Sarawak Bintulu, Sarawak	30 Dec '11 30 Dec '11	29-Dec-21 29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053 CU-RSPO-819167, RSPO 0020	
	Mostyn	Kunak Sabah	16 Jan '09	NA	NA NA	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-20	RSPO 004	
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-20	RSPO 002	
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-20	RSPO 001	
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	
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	
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	SGS-RSPO/PM-00715, 824 502 16040, BVC-RSPO20170623-01	
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042	
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-20	RSPO 548299	
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	RSPO 550182	

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	
	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	
	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	

Legends

Pending Certification by RSPO

Mill closed down/Mothballed

NA - NOT APPLICABLE