



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

File Ref. : ES10170018

RSPO PUBLIC SUMMARY REPORT

CLIENT : SIME DARBY PLANTATION (SABAH) SDN BHD - SOU 28 BINUANG
PARENT COMPANY : SIME DARBY PLANTATION SDN BHD
RSPO MEMBERSHIP No.: 1-0008-04-000-00

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

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
Binunag Strategic Operating Unit (SOU 28)	Binuang Oil Mill	4° 42' 15" N	118° 03' 39" E	91207 Kunak, Sabah, Malaysia
	Binuang Estate	4° 42' 03" N	118° 04' 11" E	91207 Kunak, Sabah, Malaysia
	Sungang Estate	4° 39' 38" N	118° 07' 15" E	91207 Kunak, Sabah, Malaysia
	Tingkayu Estate	4° 43' 03" N	118° 04' 46" E	91207 Kunak, Sabah, Malaysia
	Jelota Bumi Estate	4° 43' 48" N	117° 59' 55" E	91207 Kunak, Sabah, Malaysia

MAP : See Attachment 1

AUDIT DATE : 25 - 28 June 2019

DURATION : 20 auditor days

TYPE OF AUDIT : Annual Surveillance Audit No. 4 Recertification Audit

STANDARD : RSPO PRINCIPLE & CRITERIA MYNI 2014, AND RSPO SUPPLY CHAIN CERTIFICATION STANDARD 2014 (REVISED 14 JUNE 2017)

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

VALIDITY OF RSPO CERTIFICATE : 13/7/2015 - 12/7/2020

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 : 

Signature : 

Signature : (SYED AKHMAL BIN SYED ISA)
SENIOR MANAGER

Date : 27 September 2019

Date : 03 OCT 2019

RSPO P&C PUBLIC SUMMARY REPORT

SUMMARY OF AUDITS

Stage 2 audit / Recertification audit					
On-site audit date	:	6-9 April 2015	No. of auditor days	: 16	
Audit team	:	Hazani Othman (LA), Valence Shem, Mohamed Hidhir Zainal Abidin, Hj. Mohd Norddin Abd. Jalil.			
No. of major NCR	:	18	Indicator: 1.1.1, 2.1, 2.1.1, 3.1,4.1,4.1.2, 4.4, 4.4.1, 4.6, 4.7, 4.7.1, 4.8.1, 5.1, 5.3, 6.2, 6.4, 6.5.2, 6.6, 6.7.1, 6.8.1, 6.9 and 8.1.	Closing date : 25/4/2015	
No. of minor NCR	:	7	Indicator : 2.1.4, 4.2, 4.3, 4.5, 5.1.2, 5.2.3 and 6.8.2		
Indicate the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities	Suppliers
		X		X	X
		Contract workers	NGOs	Govt. agency	Independent growers
		Indigenous people	Contractor	Others (Please specify)	
		X			
Supply base sampled	:	Binuang Estate, Sungang Estate and Tingkayu Estate			

Annual Surveillance Audit 1					
On-site audit date	:	30 May 2016	No. of auditor days	: 16	
Audit team	:	Mohd Zulfakar Kamaruzaman (LA) , Mohd Razman Salim, Jagathesan a/l Suppiah, Selvasingam T. Kandiah, Ruzita Abd Gani			
No. of major NCR	:	3	Indicator: 2.1.1, 4.7.3 and 5.2.2	Closing date : 1/7/2016	
No. of minor NCR	:	3	Indicator : 4.1.2, 4.5.2 and 4.8.2		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities	Suppliers
		X		X	X
		Contract workers	NGOs	Govt. agency	Independent growers
		Indigenous people	Contractor	Others (Please specify)	
		X			
Supply base sampled	:	Blnuang Estate and Jeleta Bumi Estate			
Changes since the last audit	:	No changes.			

Annual Surveillance Audit 2					
On-site audit date	:	16-19 May 2017	No. of auditor days	: 16	
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Rahayu Zulkifli, Hazani Othman, Jagathesan a/l Suppiah			
No. of major NCR	:	3	Indicator: 2.1.1, 4.7.2 ,4.8.1	Closing date : 10/8/2017	
No. of minor NCR	:	5	Indicator : 4.1.3, 4.4.3, 5.3.3, 6.2.3, 6.5.3		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities	Suppliers
		X		X	X
		Contract workers	NGOs	Govt. agency	Independent growers
		Indigenous people	Contractor	Others (Please specify)	
			X		
Supply base sampled	:	Tingkayu Estate and Sunggang Estate			
Changes since the last audit	:	No changes.			
Annual Surveillance Audit 3					
On-site audit date	:	16-19 April 2018	No. of auditor days	: 16	

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Audit team	:	Mohd Razman Salim, Rahayu Zulkifli, Ruzita Abd Gani & Rozaimée Abd Rahman		
No. of major NCR	:	2	Indicator: MRS 01/2018 & RZ 01/2018	Closing date : 13/07/2018
No. of minor NCR	:	NA	Indicator : NA	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities
		X		X
		Contract workers	NGOs	Govt. agency
		X		
		Indigenous people	Contractor	Others (Please specify)
			X	
Supply base sampled	:	Binuang Estate and Jeleta Bumi Estate		
Changes since the last audit	:	As verified by lead auditor and social auditor during site visit and as per Social Impact Assessment report, there was no local community or indigenous people living within or nearby to the boundary of Binuang Estate and Jeleta Bumi Estate during this audit.		
Justification of audit planning	:	Total allocation of auditor days were: <ul style="list-style-type: none"> • Mill = 4 days (3 days for safety and health, environment, mill best practices, GHG verification + 1 day for supply chain certification systems) • Binuang & Jeleta Bumi Estates = 6 days each for verification of safety and health, environment, good agriculture best practices, GHG verification. More mandays allocated for both estates due to location of the estate (> 1 hour travelling) and required more time for site visit and interview with stakeholders.		
Report approved by	:	Radziah Mohd Daud	Approval date : 23/07/2018	

Annual Surveillance Audit 4

On-site audit date	:	25-28 June 2019	No. of auditor days :	20
Audit team	:	Mohd Zulfakar Kamaruzaman, Rozaimée Ab Rahman, Amir Bahari, Rahayu Zulkifli & Mohd Norddin Abd Jalil		
No. of major NCR	:	1	Indicator: 4.7.2	Closing date : 20/09/2019
No. of minor NCR	:	4	Indicator : 4.1.2, 5.2.4, 6.2.3 and 6.5.3	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities
		√		√
		Contract workers	NGOs	Govt. agency
				√
		Indigenous people	Contractors	Others (Please specify)
		NA	√	
Supply base sampled	:	Binuang Estate, Jeleta Bumi Estate, Tingkayu Estate, Sungang Estate.		
Changes since the last audit	:	1) The Person-In-Charge (SOU Chairman) has been changed from Mr. Mohd Safirus Hailani to Mr. Syed Akhmal bin Syed Isa. 2) Changes in certified area as provided in the Summary-Table 1 below.		
Justification of audit planning	:	Total allocation of auditor days were: <ul style="list-style-type: none"> • Mill = 4 days (3 days for safety and health, environment, social, mill best practices, GHG verification + 1 day for supply chain certification systems). • Binuang, Tingkayu, Sungang and Jeleta Bumi Estates = 4 days each for verification of safety and health, social, HCV, environment, good agriculture best practices, GHG verification. 		
Report approved by	:	Kamini Sooriamorthy	Approval date : 27/09/2019	

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SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period			May 2017- April 2018	April 2018 – March 2019	June 2019 – May 2020
Certified FFB Processed (MT)			169,284.65	171,059.13	140,152.00
Production of Certified CPO (MT)			38,935.47	40,359.63	32,235.00
Production of Certified PK (MT)			8,464.23	8,630.50	7,008.00
Certified Areas (Ha)			11,703.91	11,703.91	*11,659.58
Planted Areas (Ha)			9,791.99	9,791.99	*9,788.17
Production Areas (Ha)			NA	7,598.77	7,358.93
HCV Areas / Conservation Areas (Ha)			753.915	753.915	753.915
REMARKS	*Changes in certified and planted area due to adjustment made after GPS resurvey and field transfer among group estates (Tingkayu and Sungang Estate).				

TABLE 2

	PO	PK
Last years certified volume (MT)	40,359.63	8,630.50
Last years actual certified sold (MT)	19,852.38	7,453.50
Last years actual sold under other schemes (MT)	-	-
Last years sold conventional (MT)	17,194.21	694.71
New year certified volume (MT)	32,235.00	7,008.00

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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)	10
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.	10
Any new acquisition which has replaced primary forests or HCV areas	10
3.3 Other changes (e.g. organizational structure, new contact person, addresses, etc.)	10
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1.0 AUDIT PROCESS

1.1 Certification Body

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

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Zulfakar Kamaruzaman	Lead Auditor / HCV, Social (Mill Only), Land Title & Supply Chain	Holds a B.Sc. Forestry from University Putra Malaysia. He had more than 4 years of working experience in the oil palm operation.
Rahayu Zulkifli	Auditor, Social (Estate)	Holds a Degree in LLB (Hon), she was a practicing lawyer before joining WWF-Malaysia and RSPO as a Dispute Settlement Facility Manager.
Amir B Bahari	Auditor Health & Safety, Environment related to plantation	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.
Rozaimiee Ab Rahman	Auditor / Environmental, TBP & OHS related to Mill	Holds a B.Sc. of Agriculture from University Putra Malaysia. He had more than 5 years of working experience in the oil palm operation.
Mohd Norddin Abdul Jalil	Auditor / GAP	Holds B.Sc. Agriculture (weed management) and had more than 35 years of working experience in plantation management covering rubber and oil palm.

1.3 Audit methodology

The sampling of the number of the supply base was using the formula of \sqrt{y} if all estates under Certification unit have more than 4 units. However, for Binuang CU, 100% sampling was carried out where the audit covered Binuang Estate, Tingkayu Estate, Jeleta Bumi and Sungang Estate. The audit included an on-site audit to the estates, mill, linesites, amenities and facilities to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

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

1.5 Audit plan : Refer to Attachment 2

1.6 Date of next audit : The next surveillance audit will be conducted within 12 months but not sooner than 9 months from this audit.

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2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Sime Darby Plantation Sdn Bhd - SOU 28 Binuang is a certification unit which consisted of Binuang Oil Mill, Binuang Estate, Sungang Estate, Tingkayu Estate and Jeleta Bumi Estate. Located in Kunak, Sabah, East Malaysia, the palm oil mill has a capacity of 40 mt/hr.

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

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

Table 1: Actual FFB production by the supply base for the last reporting period (April 2018 to March 2019)

Estates	FFB Production	
	Tonnes	Percentage (%)
Binuang	57,449.04	34.31
Sungang	26,922.84	16.08
Tingkayu	46,738.93	27.92
Jeleta Bumi	34,970.69	20.89
Diversion from RSPO Certified Estate		
Mostyn	862.48	0.51
Giram	486.51	0.29
Total	167,430.49	100.00

Table 2: Projected FFB production by supply base for the next reporting period (June 2019 to May 2020)

CU own estates	FFB Contribution	
	Tonnes	Percentage (%)
Binuang	28,635	20
Sungang	29,767	20
Tingkayu	44,700	32
Jeleta Bumi	37,050	26
Total	140,152.00	100.00

Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period (April 2018 – March 2019)

	Total (MT)
FFB Received	167,430.49
FFB Processed	167,295.48
CPO Production	37,613.69
PK Production	8,273.88
CPO delivered as RSPO certified	19,852.38
CPO delivered under other scheme	-
CPO delivered as non-RSPO certified	17,194.21
PK delivered as RSPO certified	7,453.50
PK delivered under other scheme	-
PK delivered as non-RSPO certified	694.71
Credits traded through Books and Claim	0.00

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Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period (June 2019 to May 2020)

	Total (MT)
FFB Received	140,152
FFB Processed	140,152
CPO Production	32,235
PK Production	7,008
CPO delivered as RSPO certified	32,235
CPO delivered under other scheme	0
CPO delivered as non-RSPO certified	0
PK delivered as RSPO certified	7,008
PK delivered under other scheme	0
PK delivered as non-RSPO certified	0

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Binuang	2,673.02	3,271.08
Sungang	1,955.80	3,407.98
Tingkayu	2,387.70	1,881.08
Jeleta Bumi	2,771.65	3,099.44
Total	9,788.17	11,659.58

Table 6 Planting profile for Binuang Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1991	1 st	Mature	20.00	0.75
2002	2 nd	Mature	311.77	11.66
2005	2 nd	Mature	307.41	11.50
2007	2 nd	Mature	483.83	18.10
2009	2 nd	Mature	465.96	17.43
2010	2 nd	Mature	183.42	6.86
2011	2 nd	Mature	106.95	4.00
2012	2 nd	Mature	143.51	5.37
2013	2 nd	Mature	142.58	5.33
2014	2 nd	Mature	165.28	6.18
2015	2 nd	Immature	151.01	5.65
2016	2 nd	Immature	153.94	5.76
2017	2 nd	Immature	37.36	1.40
Total			2,673.02	100

Table 7 Planting profile for Sunggang Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1994	1st	Mature	467.78	23.92
2011	2nd	Mature	176.90	9.04
2012	2nd	Mature	115.71	5.92
2013	2nd	Mature	140.48	7.18
2014	2nd	Mature	228.20	11.67
2015	2nd	Immature	200.24	10.24
2016	2nd	Immature	172.51	8.82
2017	2nd	Immature	217.47	11.12
2018	2nd	Immature	236.51	12.09
Total			1,955.80	100

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Table 8: Planting profile for Tingkayu Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2003	2 nd	Mature	162.05	6.78
2004	2 nd	Mature	123.49	5.17
2005	2 nd	Mature	351.95	14.74
2007	2 nd	Mature	627.92	26.30
2009	2 nd	Mature	238.93	10.01
2010	2 nd	Mature	241.61	10.12
2014	2 nd	Mature	206.14	8.63
2015	2 nd	Mature	120.56	5.05
2015	2 nd	Immature	115.29	4.83
2016	2 nd	Immature	199.76	8.37
Total			2,387.70	100

Table 9: Planting profile for Jeleta Bumi Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1993	1st	Mature	161.47	5.83
1994	1st	Mature	595.27	21.48
1995	1st	Mature	789.83	28.50
2002	1st	Mature	9.45	0.34
2014	2nd	Mature	270.48	9.76
2015	2nd	Immature	205.94	7.43
2017	2nd	Immature	209.04	7.54
2018	2nd	Immature	255.08	9.20
2019	2nd	Immature	275.09	9.93
Total			2,771.65	100

2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

Name	:	Syed Akhmal bin Syed Isa
Position	:	Senior Manager, Binuang Estate
Address	:	Ladang Binuang, P.O Box 130, 91207 Kunak, Sabah, Malaysia.
Phone no.	:	+6089-855197
Fax no.	:	+6089-855190
Email	:	ldg.binuang@simedarby.com

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3.0 AUDIT FINDING

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

There was no changes regarding to certified products.

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

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

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

There was 3 SOU located in Indonesia, Papua New Guinea (NBPOL), and Liberia not yet certified. Details issues related to these were covered in the section - RSPO Certifications Systems for Principles & Criteria June 2017, in this report.

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

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

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

If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification?

If no, please state reasons

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

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

Yes, previous SOU Chairman Mr Mohd Safirus bin Hailani. was replaced by Mr Syed Akhmal bin Syed Isa.

3.4 Status of previous non-conformities * Closed Not closed*

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

3.5. Complaint received from stakeholder (if any)

There were some stakeholders interviewed during the conduct of this audit. These include workers, contractors and suppliers. In general, all the interviewed stakeholders had given positive feedback on the CU.

There was no local communities or indigenous people living within or nearby to the boundary of Binuang Estate, Sungang, Tingkayu and Jeleta Bumi Estate as verified during site visit and also as reported in the Social Impact Assessment for both mill and estates.

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4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s)
(details refer to Attachment 4) List : 4 MN 01 2019, MZK 01 2019, RZ 01 2019, RZ 02 2019

Total no. of major NCR(s)
(details refer to Attachment 4) List : 1 RAR 01 2019

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

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

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

5.0 AUDIT CONCLUSION

The audit team concludes that the organization has / ~~has not~~ 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 RECOMMENDATION

No NCR recorded. Recommended to continue certification.

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

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

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

Recommended to continue certification.

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

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

7.0

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

Audit Team Leader : Mohd Zulfakar Kamaruzaman

(Name)



(Signature)

20/09/2019

(Date)

Location map of SOU 28 Binuang



RSPO SURVEILLANCE 4 AUDIT PLAN

1. Objectives

The objectives of the audit are as follows:

- (i) To determine Certification Unit conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI)
- (ii) To verify the effective implementation of corrective actions arising from the findings of last audit
- (iii) To make appropriate recommendations based on the audit findings

2. Date of audit : 25 – 28 June 2019

3. Site of audit : SOU Binuang

- Binuang Palm Oil Mill
- Binuang Estate
- Jeleta Bumi Estate
- Tingkayu Estate
- Sungang Estate

4. Scope of certification : Production of sustainable crude palm oil and palm kernel using the Identity Preserved supply chain model.

5. Audit Criteria:

- RSPO P&C MYNI: 2014
- RSPO Certification Systems, June 2007
- RSPO Supply Chain Standard, 14 June 2017
- Company's audit criteria including Company's Manual/Procedures

6. Audit Team

a) Audit Team Leader : Mohd Zulfakar Kamaruzaman (HCV, Social (Mill), Supply Chain)

b) Auditor : Rahayu Zulkifli (Social (estate)

Rozaimée Ab Rahman (Environment (Mill), Safety (mill), TBP and GHG)

Mohd Zulfakar Kamaruzaman (HCV, Social (Mill), Supply Chain)

Mohd Norddin Abdul Jalil (Good Agriculture Practices)

Amir Bahari (Environment (Estate), Safety (Estate)

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7. **Audit Method**

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

8. **Audit Findings**

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

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

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

9. **Confidentiality Requirements**

SIRIM QAS International shall not disclose any information concerning the company regarding all matters arising or coming to its attention with the conduct of the programme, which is of confidential in nature other than information, which is in the public domain. In the event that there be any legal requirements for disclosing any information concerning the organization, SIRIM QAS International shall inform the organization of the information to be disclosed.

10. **Working Language** : English and Bahasa Malaysia

11. **Reporting**

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

11. **Facilities Required**

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

12. **Audit Programme Details**: As shown below:

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Date / Time	Coverage of assessment / Activity / Site	Zulfakar	Rahayu	Rozaimée	Norddin	Amir
Day 1: 24 June 2019 (Monday)						
8.30am – 9.15am	<p>Opening Meeting – Venue: Binuang POM</p> <ul style="list-style-type: none"> • Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes • Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases , Time bound plan, actions taken to address previous audit findings. 					
9.15am – 12.30pm	<p>Site observation to Binuang POM RSPO Supply Chain 2014</p> <ul style="list-style-type: none"> • RSPO Supply chain standard implementation including model requirements P1, P2, P3, P4, P5, P6, P7, P8 • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Land titles user rights • Social aspects - SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, • New planting • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management 					
9.15am – 12.30pm	<p>Site observation to Binuang Estate</p> <ul style="list-style-type: none"> • P1, P2, P3, P4, P5, P6, P7, P8 • Verification of basic information estate • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative, 					

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	<ul style="list-style-type: none"> contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, • New planting • Interview with workers, contractors etc. • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management 					
12.30pm – 1.30pm	Lunch Break					
1.30pm – 5.00pm	Continue assessment at respective sites					
Date / Time	Coverage of assessment / Activity / Site	Zulfakar	Rahayu	Rozaimee	Norddin	Amir
Day 2: 25 June 2019 (Tuesday)						
8.30am – 12.30pm	Site observation to Binuang POM P1, P2, P3, P4, P5, P6, P7, P8 <ul style="list-style-type: none"> • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Land titles user rights • Social aspects - SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, • New planting • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management 					
8.30am – 12.30pm	Site observation to Jeleta Bumi Estate <ul style="list-style-type: none"> • P1, P2, P3, P4, P5, P6, P7, P8 • Verification of basic information estate • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management 					

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	<ul style="list-style-type: none"> • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, • New planting • Interview with workers, contractors etc. • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management 					
12.30pm – 1.30pm	Lunch Break					
1.30pm – 5.00pm	Continue assessment at respective sites					
Date / Time	Coverage of assessment / Activity / Site	Zulfakar	Rahayu	Rozaimée	Norddin	Amir
Day 3: 26 June 2019 (Wednesday)						
8.30am – 12.30pm	Site observation to Jeleta Bumi Estate <ul style="list-style-type: none"> • P1, P2, P5, P7, P8 • Verification of basic information estate • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Interview with workers, contractors etc. • Land titles user rights 					
8.30am – 12.30pm	Site observation to Sungang Estate <ul style="list-style-type: none"> • P1, P2, P3, P4, P5, P6, P7, P8 • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • 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. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, • New planting • Interview with workers, contractors etc. • Occupational safety & health aspects , chemical management 					

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	<ul style="list-style-type: none"> • Interview with workers, contractors etc. • Environmental management, waste & chemical management 					
12.30pm – 1.30pm	Lunch Break					
1.30pm – 5.00pm	Site observation to Sungang Estate <ul style="list-style-type: none"> • P1, P2, P5, P7, P8 • Verification of basic information estate • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Interview with workers, contractors etc. • Land titles user rights 					
1.30pm – 5.00pm	Continue assessment at respective sites					
Date / Time	Coverage of assessment / Activity / Site	Zulfakar	Rahayu	Rozaimee	Norddin	Amir
Day 4: 27 June 2019 (Thursday)						
8.30am – 12.30pm	Site observation to Binuang Estate <ul style="list-style-type: none"> • P1, P2, P5, P7, P8 • Verification of basic information estate • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Interview with workers, contractors etc. • Land titles user rights 					
8.30am – 12.30pm	Site observation to Tingkayu Estate <ul style="list-style-type: none"> • P1, P2, P3, P4, P5, P6, P7, P8 • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • 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. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, • New planting • Interview with workers, contractors etc. • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management 					

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12.30pm – 1.30pm	Lunch Break					
1.30 pm- 3.30 pm	Site observation to Tingkayu Estate <ul style="list-style-type: none"> • P1, P2, P5, P7, P8 • Verification of basic information estate • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Interview with workers, contractors etc. • Land titles user rights 					
1.30pm – 3.30pm	Continue assessment at respective sites					
3.30pm – 4.00pm	<ul style="list-style-type: none"> • Verification on outstanding issues • Audit team discussion, preparation on audit findings and issuance of nonconformity report (if any) 					
4.00pm -5.00pm	<ul style="list-style-type: none"> • Closing meeting – venue at Tingkayu Estate • Presentation of audit findings, positive comment, • Question & answer 					

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Attachment 3

RSPO P&C AUDIT CHECKLIST AND FINDINGS

Principle 1: COMMITMENT TO TRANSPARENCY

Clause	Indicators	Comply Yes/No	Findings
C 1.1 Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 There shall be evidence that growers and millers provide adequate information upon request for information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.	YES	SOU 28 Binuang continued to implement the communication procedure. At the point of audit, there was no request for information from the stakeholders. Binuang POM, Tingkayu Estate, Sungang Estate, Jeleta Bumi Estate and Binuang Estate management documents relating to environment, social and legal issues were made available to the public except for those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. Furthermore, SDPSB continued to use the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances were available through SDPSB website at http://plantation.simedarby.com
	1.1.2 Records of requests for information and responses shall be maintained. Major Compliance	YES	All units within SOU 28 Binuang maintain records of requests for information as well as the responses.
C 1.2 Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.	1.2.1 Land titles/user rights (Criterion 2.2);	YES	Information relating to land titles are available at the SDPSB website at http://plantation.simedarby.com . The auditor had verified the land titles for SOU 28 and confirmed that SDPSB owned the SOU.
	Occupational health and safety plans (Criterion 4.7);	YES	The CU has an OSH program for Financial Year 2019. The program list as guided by SQM personnel includes the following activities/ events; Establishment of OSH committee, OSH program & review, OSH inspection, Town Hall session, Health & Hygiene monitoring program - monthly medical check-up, Safety & health training - fire drill & fire fighting, First Aid awareness, chemical safety / PPE awareness & adherence. The activities were translated through the training sessions and the ESH programs/activities as sighted in the ESH related documents.
	Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)	YES	Each unit within the SOU 28 Binuang mitigates negative social impacts and promotes positive ones by calling for meetings with their respective stakeholders, documenting the discussions, and identifying persons in charge to address the issues. Issues that require followed up for further action were included in the respective site's specific SIA Action Plan. The Action Plan consists of areas of concern, action plan, person-in-charge, expected completion date and remarks. The 2019 Action Plan which documented issues raised by stakeholders, timetabled and included responsibilities for implementation, was prepared following Stakeholders' Meeting. Please cross refer to Indicator 6.1.3 below.

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Clause	Indicators	Comply Yes/No	Findings
			<p>For Environmental aspect: ESH Management System Manual (SD/ SDP / SQM (ESH) / 001-1 rev 0– dated 1/07/, 2012 was available.</p> <ul style="list-style-type: none"> i) Environmental, Safety, Health Program for FY2017 for POM and both estates was reviewed on Jan 2019. ii) Pollution prevention Plan 2019 was reviewed on Jan 2019. The status of the actions taken were monitored. iii) Quality / Safety / Environmental Management Programme – has been established, reviewed and the status of the action taken is being monitored. <p>The plan also includes Pollution Prevention Plan – Action Plan and Time Frames have been established and the status of the action taken is being monitored.</p>
	HCV documentation summary (Criteria 5.2 and 7.3);	YES	HCV documentation summary was made available at All Estates. As verified in the 'HCV Re-Assessment for Strategic Operating Unit (SOU) Sabah Central – South Zone, Final Report (Version II) – January 2014' at Table 11: Decision on HCV Status.
	Pollution prevention and reduction plans (Criterion 5.6);	YES	Environmental Improvement Plan 2019 was established in Jan 2019. The plan also includes The pollution and prevention plan. This includes the list of waste generated from estate and mill activities and tabulated in the (<i>Pollution Prevention Plan 2019</i>). The sources of pollution have been identified by management inclusive of the management action plan details of PIC and timeline. Among other the activities covered include nursery, growing, drainage, planting, fertilizing, scheduled waste management and mill operation. Details as per criterion 5.3.
	Details of complaints and grievances (Criterion 6.3);	YES	Details of complaints and grievances of the Binuang 28 SOU were recorded in several books depending on the types of complaints lodged. The complaints lodged are generally due to defects in the workers' houses such as leaking pipes, blocked drains and toilets, etc. Details include date complaints were received, details of complaints, date for action taken and date when repairs were completed. There was no evidence of complaints received from external stakeholders.
	Negotiation procedures (Criterion 6.4);	YES	Negotiation procedure for the SOU 28 Binuang was defined in the "Flowchart and Procedures On Handling Land Dispute". This document was made available and sighted during the audit. Based on evidence available, there is no land dispute observed.
	Continual improvement plans (Criterion 8.1);	YES	Sime Darby Plantation Sdn. Bhd. 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 for continuous improvement in key areas of operations, environmental, safety & health and welfare of the workers as well as social contribution to the community. Details of the CU continual improvement plans were reported in indicator 8.1. The continuous improvement plans related to environment was established and updated accordingly. Continual improvement plans were made available at all audited operating units. Among

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Clause	Indicators		Comply Yes/No	Findings
				the documents reviewed were: Pollution Prevention Plan, Identification and Management of Wastewater, Waste Management Plan, Environmental Improvement Plan, Social Action Plan.
		Public summary of certification assessment report;	YES	Public summary for RSPO certification assessment report can be assessed at the SIRIM QAS webpage.
		Human Rights Policy (Criterion 6.13).	YES	Sime Darby Plantation Berhad (SDPB) has developed a Social & Humanity Management Policy in Jan 2015.
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 Binuang is bound by, and observes the Sime Darby Group's "Code of Business Conduct (COBC)". This COBC is also available on its website http://www.simedarby.com/about-us/governance/ and communicated to all employees.

Principle 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

Clause	Indicators		Comply Yes/No	Findings
C 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1	Evidence of compliance with relevant legal requirements shall be available. Major Compliance	YES	Generally, SOU Binuang had demonstrated compliance with local, state, national and ratified international laws and regulations. Relevant licenses and permits such as DOE, DOSH, JTK MPOB license, Energy Commission and Ministry of Domestic Trade for diesel storage were valid and displayed at the estate office. Site audit at operational areas and supporting facilities confirmed evidence of compliance. Foreign Workers had valid work permits and passports. The renewal of work permits was carried by SDPB Foreign Workers Centre. Randomly sampled foreign workers employed within the Merotai CU have valid passports and visit passes issued by the Immigration Department. For other Legal requirement, these legal were reviewed: Permit (JTK) to salary deduction, MPOB license, License "Menggaji pekerja bukan pemastautin", Permit to storage diesel, Trading license, Suruhanjaya Tenaga License, Fire Certificate etc. Other legal requirements were as follows: Steam Boiler and Unfired Pressure Vessel 1970, The Factories and Machinery (Notification, Certificate of Fitness and Inspection), Regulations, 1970 Regulation 10(2), Noise Exposure Regulations 1989, OSH (Use and Standards Of Exposure of Chemicals Hazardous to Health Regulations 2000), Code of Practice in Confined Space 2010 etc.
	2.1.2	A documented system, which includes written	YES	SOU 28 Binuang have identified, documented and maintained their legal register with written information on legal requirements which related to their operation in legal register. The Sime Darby

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Clause	Indicators		Comply Yes/No	Findings
		information on legal requirements shall be maintained. Minor Compliance		headquarters, PSQM Department was responsible to track changes and the information was disseminated to all Estates and Mills.
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	YES	Updating of the LORR was done by the PSQM at Sime Darby Headquarters. Respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirements as well as monitoring the status of legal compliances.
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	YES	SQM Department, based at Head Office was responsible to track changes in the law and the information was disseminated to all of its plantations and mills. SQM department, which is based in Kuala Lumpur, is responsible for tracking any changes to the Acts and Regulations. In addition, the CEO of Sabah Region also played a role in disseminating new Acts & Regulations to all the mills and estates in the Region.
C 2.2 The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.	2.2.1	Documents showing legal ownership or lease, history of land tenure (confirmation from community leaders based on history of customary land tenure, recognised NCR land) and the actual legal use of the land shall be available. Major Compliance	YES	The Land Title for All Estate has been verified for all Estate (Binuang, Jeleta Bumi, Tingkayu and Sungang Estate) and it was confirmed that all the land title was originally from Sabah Land Development (SLB). Jeleta Bumi Estate – Private company has bought the Land for Jeleta Bumi from SLB in 1977. And the, in Dec 1984 Syarikat Jeleta Bumi has bought back the land from the private company and Syarikat Jeleta Bumi was listed as one of companies under Kumpulan Guthrie Berhad (KGB). In 2007, KGB merged with Sime Darby. Sungang & Binuang Estate – these 2 estates were actually owned by Bena Plantation (Bena) and Bena bought the land from SLB in Oct 1979 for cocoa planting. Bena then changed their names to Tongkah Plantations (M) Sdn Bhd/Harrissons Malaysia Plantations Sdn Bhd (Harrissons) and starting from Jan 1990, the company changed the planting material to Oil Palm. Harrissons belonged to Golden Hope (Sabah). In 2007, Golden Hope merged with Sime Darby. Tingkayu Estate – Tingkayu Estate is one of the divisions under Mostyn Estate (SOU Giram). The Land Title for Mostyn estate were originated from 11 smallholders and the smallholders sold the lands to Harrissons from year 1984 to 1992. Auditor has verified the record of land transferred from smallholders to Harrissons. Harrissons then sold the land to Golden Hope Plantations (GH) and after that, GH merged with Sime Darby in 2007.
	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	During site visit at all estates, sighted the estate has visibly maintained its boundary pegs adjacent with smallholder plantation, IOI Baturong, Forest Reserve (Madai Baturong and Ulu Kalumpang) and Yuwang Estate the boundary pegs were already visible and maintained.

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Clause	Indicators		Comply Yes/No	Findings
	2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with FPIC. Minor Compliance	YES	As reported in 2.2.1 of this checklist, it has been verified that the land was now legitimately owned by SOU Binuang since 1977. The audit team had confirmed that there were no land issues related to previous owners.
	2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes are implemented and accepted by the parties involved. Major Compliance	YES	As reported in 2.2.1 of this checklist, it has been verified that the land was legitimately owned by SOU Binuang since 1977. Hence, there was no land conflict anticipated and no need for acceptable conflict resolution processes.
	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 JCC, Gender and Stakeholder Meetings and interviewed with villagers and other oil palm plantation companies that there was no violence action taken by the SOU Binuang 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 owned by SOU Binuang since 1977. Hence, there was no land conflict anticipated nor the need to avoid escalation of conflict is required.
C 2.3 Use of the land for oil palm does not diminish the	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights shall be	YES	As reported in 2.2.1 of this checklist, SOU Binuang has been developed since 1977, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in Sime Darby Plantation HQ Office and the photocopy was verified by the auditor at estate. There were no issues regarding land with villagers, local community

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Clause	Indicators		Comply Yes/No	Findings
legal, customary or user rights of other users without their free, prior, and informed consent.		developed through participatory mapping involving affected parties. Major Compliance		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.
	2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) shall be available and shall include:	YES	As reported in 2.2.1 of this checklist, SOU Binuang has been developed since 1977, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in Sime Darby Plantation HQ Office and the photocopy was verified by the auditor at estate. 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.
	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			

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Clause	Indicators	Comply Yes/No	Findings
	company's title, concession or lease on the land. Minor Compliance		
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 SOU Binuang.
2.3.4	Evidence shall be available to show that communities are represented through institutions or reps. 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 SOU Binuang.

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

Clause	Indicators	Comply Yes/No	Findings
C 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability.	3.1.1 A business or management plan (minimum three years) shall be documented. That includes, where appropriate, a business case for scheme smallholders. Major Compliance	YES	Binuang SOU continued to commit to long-term economic and financial viability. The annual budgets for 2019 to 2023 were sighted. The budget covers activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure and RSPO compliance. The budget also included projections on yield/ha, and total cost of production per m ton & per ha.
	3.1.2 An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. Minor Compliance	YES	The replanting programme for the next five years had been prepared as sighted in the Long-Range Replanting Programme (LRRP) 2019 to 2023. This programme reviewed once a year and was incorporated in their annual financial budget.

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

Clause	Indicators	Comply Yes/No	Findings
C 4.1 Operating procedures are appropriately documented, consistently implemented and monitored.	4.1.1 SOPs for estates and mills shall be documented. Major Compliance	YES	In Binuang CU, the SOPs for each of the process had continued to be implemented. Brief version of the SOPs were displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. Generally, it was observed that activities being implemented involved safety and health, environmental, quality, employees, etc.
	4.1.2 A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	NO	Binuang SOU had the mechanisms to check the implementation of procedures and were carried out through internal audit, safety and health meeting and routine inspection (workplace inspection) by assistant manager, staff and hospital assistant. During the site visit to the chemical stores of Jeleta Bumi and Tingkayu Estates, it was found out that a significant chemical odour were detected indicating that the pesticides stores were not well ventilated. Therefore a Minor NCR MN01 2019 was raised against this indicator.
	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 was to ensure that the established procedures were consistently implemented. Records of monitoring and actions taken by all the 4 estates were maintained and kept for a minimum of 12 months.
	4.1.4 The mill shall record the origins of all third-party sourced FFB. Major Compliance	YES	There was no third party FFB supplier send their FFB to Binuang POM.
C 4.2 Practices maintain soil fertility at or, where possible, improve oil fertility to a level that ensures optimal and sustained yield.	4.2.1 There shall be evidence that good agriculture practices, as contained in SOPs, are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance	YES	Binuang SOU continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer recommendations. 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.
	4.2.2 Records of fertiliser inputs shall be maintained. Minor Compliance	YES	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 Binuang SOU 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.

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Clause	Indicators		Comply Yes/No	Findings
	4.2.4	A nutrient recycling strategy shall be in place, and may include use of EFB, POME, and palm residues. Minor Compliance	YES	Binuang SOU had a nutrient recycling strategy where palm fronds were properly stacked in the interrow to decompose and EFB were applied in the mature.
C 4.3 Practices minimise and control erosion and degradation of soils.	4.3.1	Maps of any fragile/marginal soils shall be available. Major Compliance	YES	During the field visit and the soil map provided it was observed that no fragile or marginal soils in Binuang SOU.
	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	Binuang SOU had a management strategy for planting on slopes 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 item 8 Section 4 and Land Preparation for Terracing in ARM Manual.
	4.3.3	A road maintenance programme shall be in place. Minor Compliance	YES	Binuang SOU continued to maintain its road, according to the road maintenance programmes. The programs had been supported by adequate provisions in the budgets.
	4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. Major Compliance	YES	There were no peat soils in both audited estates.
	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	There were no peats soils in both estates.
	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance	YES	There were no problematic soils in both estates. Refer to soil types at 4.3.1
C 4.4 Practices maintain the quality and	4.4.1	An implemented water management plan shall be in place. Minor Compliance	YES	Both the Mill and the estates had its <i>Water Management Plan for 2019</i> which was developed in order to maintain the quality and availability of natural water resources by practicing efficient water consumption through various methods.

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Clause	Indicators		Comply Yes/No	Findings
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 shall be demonstrated. Major Compliance	YES	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at all the 4 estates visited. Riparian buffer zones have been identified and demarcated. No chemicals and fertilizer application observed been used in their maintenance.
	4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national reg. Minor Compliance	YES	Sighted monthly monitoring on treated effluent discharge and result within the DOEs' limit. Sighted latest quarterly report has been submitted to DOE accordingly.
	4.4.4	Mill water use per tonne of FFB shall be monitored. Minor Compliance	YES	Mill water usage per tonne of FFB continued to be monitored on monthly basis. A slightly higher water usage noted, probably due to the proportionate reduction in volume of FFB being processed and for cleaning process.
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate IPM techniques.	4.5.1	Implementation of IPM plans shall be monitored. Major Compliance	YES	Binuang SOU continued to implement the IPM in all the 4 estates and continue to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Agricultural Reference Manual (ARM) Section 15.
	4.5.2	Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	YES	Training related to IPM implementation as per the Agricultural Reference Manual (ARM) Section 15 was conducted by Assistant Managers of all the 4 estates Estates. Records of training were sighted.
C 4.6 Pesticides are used in ways that do not endanger health or the environment.	4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. Major Compliance	YES	Written justification in the SOP of all agrochemical was available in the Agricultural Reference Manual and in the Safety Pictorial Book prepared by Sime Darby Plantation Bhd. The use of selective products that are specific to the target pest, weed or disease were demonstrated in the Agricultural Reference Manual (ARM). Chemical registers indicate the purpose of usage (intended target), hazards signage, trade and generic names.
	4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha	YES	Binuang SOU had records to show the types of pesticides used with active ingredients and their LD50, where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available for verification.

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Clause	Indicators		Comply Yes/No	Findings
		and number of applications) shall be provided. Major Compliance		
	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	Binuang SOU were committed to minimise the usage of agrochemicals by implementing IPM. Blanket spraying was not practised by this SOU and soft grasses maintained in the field. It had also been the practice that insecticides were used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section 15 and that no prophylactic use of such pesticides would be permitted.
	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 and in accordance with USECHH Reg (2000). Minor Compliance	YES	Both estates only used pesticides that are officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision Pesticides Act 1974 (Act 149) (Section 53A); and in accordance with USECHH Regulations (2000). There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used. The chemical store and chemical list indicated both estates had none of the chemicals. The use of paraquat was banned in all SDPSB estates. Most pesticides used were class III & class IV.
	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	YES	Records 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. The chemical stores in all estates were found to be in

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Clause	Indicators	Comply Yes/No	Findings
	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		compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). Training on pesticide handling had been conducted and records reviewed.
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 and Regs and Orders, Pesticides Act 1974 and Regs. Major Compliance	YES	Pesticides were stored in accordance with the legal requirement. The chemical stores in both estates were observed to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as the Pesticides Act 1974 (Act 149) and Regulations. The stores were well secured and keys held by only the store keeper and attendant.
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	YES	Pesticide applications were guided by SDPSB's ARM, Pictorial Guide, CHRA and by MSDS supplied by the manufacturer. Pictorial Safety Standards, and Security Guidelines (PSS).and Agriculture Reference Manual (ARM). The chemicals used in the Company's estates are the common chemicals used and established in the palm oil industry. Proper PPE and tools were provided to ensure that the application of pesticides were carried out appropriately.
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide appl with all relevant info within reasonable time prior to application. Major Compliance	YES	Aerial spraying was not practiced by both estates and there was no evidence to show that any had been carried out.
4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on	YES	From interviews with the staff and workers such as the storekeepers and workers who applied fertilizers, it was evident that they have been trained and understood the hazards involved and how the chemicals should be used in a safe manner. Records of training were sighted.

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Clause	Indicators	Comply Yes/No	Findings
	pesticide-handling shall be demonstrated or made available. Minor Compliance		
	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	The procedure on Scheduled Wastes (Hazardous Waste) Management has been established.
	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 recommendation from the CHRA was mainly on the training for operators working in laboratory, ETP, WTP, Boiler, workshop, scheduled waste and chemical store. In addition the assessor recommended medical surveillance be conducted for the categories of employees in the workshop and laboratory and chemicals handlers. Medical surveillance was carried out accordingly.
	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.
C 4.7 An occupational health and safety plan is documented, effectively communicated and implemented. The occupational health and safety plan shall cover the following:	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 dated January 2015 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. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors. In interviews with the workers and staff during the site visit workshop, office compound, workshop, laboratory, engine room, boiler house) revealed that the employees had been briefed and had understood the policy. The plan also covered OHS objectives and the implementation of OSH plan was monitored by internal audits conducted by OSH officers from SQM department/Regional Office.
	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	NO	Both the mill/estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. During the site visit at Binuang POM risk assessment at empty bunch conveyer chain were not identified as per SDPB SOP for palm oil mills (guard - moving object). Thus, Major NCR RAR 01 2019 has been raised.

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Clause	Indicators	Comply Yes/No	Findings
	identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance		
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	Trainings and briefings on the operations were provided for workers to educate them on safe working practices to ensure applicable precautions are adhered. Training for employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, Mill workers, harvesters, pruners, field workers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner.
4.7.4	The responsible person/s shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. Major Compliance	YES	The letter of appointment for the Managers signed by the Regional CEO was sighted. The Managers subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the estates. Similar appointment was made for all the estates and the mill. Records for meetings were sighted.
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.	YES	Accident and emergency procedures are available in adherence to the SDPB. Each estates and mill had procedures emergencies situation. There was formation of ERP Team & ERP for all the identified incidences. The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SQM and amended to tailor to the situation differences in the estates and mills. ERT members will receive training and practice in emergency procedures appropriate to their

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Clause	Indicators	Comply Yes/No	Findings
	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		respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training.
	4.7.6 All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	YES	SOU 28 Binuang provides medical care to the respective estates. Binuang Mill & Estates clinics use the facilities in Tingkayu Estate. The more serious cases are referred to Hospital Kunak or Tawau which is about 40 km from the complex. The 'Health Care Tingkayu' is managed by Tingkayu Estate which is within 4 km away from Mill and 10 km from Binuang Estate. Ambulance service from Health Care Tingkayu (which services All of the Estate in CU, and Binuang Mill) to Hospital Kunak is available. The local workers are covered by SOCSO. Similarly upon expiry of FW insurance coverage all FW will be registered for the coverage of SOCSO under the new Regulations.
	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 (Lost Man day MC). This is summarized officially in the JKPP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKPP 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 trained.	4.8.1 A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. Major Compliance	YES	Formal training programmes for 2019 covered all aspects of the RSPO Principles and Criteria. Regular assessments of training needs were presented to auditors by the Binuang POM and all estates visited. Year 2019 Training Plan was established in Jan 2019. A training needs identification matrix has been established with target dates for the training to be conducted.
	4.8.2 Records of training for each employee shall be maintained. Minor Compliance	YES	SOU 28 Binuang had trained their staff, workers and records of training were kept in the RSPO training file.

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

Clause	Indicators		Comply Yes/No	Findings
C 5.1 Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	5.1.1	An environmental impact assessment (EIA) shall be documented. Major Compliance	YES	The plans and impact assessments relating to environmental impacts based on documents for both estates and the mill are elaborated in the following records. The main purpose of for this assessment was to evaluate and analyze impact on soil, water, and air associated with the organization activities. Among environment aspects assessed were agrochemical applications, land and water contamination from hazardous material and farm vehicles, human settlement disturbance and abandonment areas. The documents were maintained, sighted and verified.
	5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive action plan. The action plan shall identify the responsible person/s. Minor Compliance	YES	There is no change of current practices required to mitigate negative effects based on identified impacts for both the mill and estates. However the mill and estates have conducted periodical review on the aspects and impacts identified and evaluated as registered. The mill and estates has continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan. Managers and assistant managers of mill and estates were identified as person-in charge of the Programs which were established upon review of the aspect and impact register. It was observed that the reviewing and updating on the registers were done annually if there's no any new activity within respective sites.
	5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive & negative env. impacts. Minor Compliance	YES	In the mill, " <i>Pollution Identification Environmental Improvement Action Plan 2019</i> " established to monitor the effectiveness of the mitigation measures taken. The following among others being monitored: i) Fuel and Lubricant leakage discharged to the land ii) Chemical Spillage discharged to the land. iii) Waste water discharge
C 5.2 The status of rare, threatened or endangered species other High Conservation	5.2.1	Information shall be collated in a HCV assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as	YES	The report of "HCV Re-Assessment for Strategic Operating Unit (SOU) Sabah Central – South Zone" prepared by the PSQM Department was available to the audit team. The report was completed in January 2014 had covered all the High Conservation Value (HCV) within and adjacent to the CU. Total hectarage for HCV area at SOU Binuang is 753.915 ha as per "HCV Re-Assessment for Strategic Operating Unit (SOU) Sabah Central – South Zone".

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Clause	Indicators		Comply Yes/No	Findings
<p>Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>		wildlife corridors). Major Compliance		
	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	Appropriate measures to maintain and protect HCV area and RTE species has been implemented by the estate as demonstrated in the updated 'Management Plan on Biodiversity & HCV Action Plan FY2019'. Noted that the refresher training on HCV including RTE was conducted accordingly. Picture, training material and attendance retained. Signage of no hunting observed to be maintained. In general, measures concerning RTE, had been implemented.
	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	Annual training program was established for Year 2019, which included refresher training on HCV / RTE. Picture, training material and attendance retained. The training included pertaining disciplinary measures should found violated company rules.
	5.2.4	Where an action plan has been created there shall be ongoing monitoring: The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; Outcomes of monitoring shall be fed back into the action plan. Minor Compliance	NO	The CU continued to monitor the HCV area as stated in the action plan. Monitoring activities was recorded in the logbook titled 'Buku Laporan Pemeriksaan HCV Area' and 'Buku Rondaan Sempadan Hutan'. It was also noted that signages pertaining to the identification and restriction of activities at buffer zone and left-over steep areas maintained and no activities inside the areas were evidence. However, although HCV/RTE monitoring has been done at all estates, the outcomes of monitoring were not fed back in to the Action Plan. Thus, a Minor NCR MZK 01 2019 has been raised.
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated	YES	No HCVs set aside associated with right of local communities since there was no local communities lived neighboring with All Estates under SOU Binuang.	

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Clause	Indicators		Comply Yes/No	Findings
		agreement that optimally safeguards both the HCVs and these rights. Minor Compliance		
C 5.3 Waste is reduced, recycled, re-used, and disposed of in an environmentally and socially responsible manner.	5.3.1	All waste products and sources of pollution shall be identified and documented. Major Compliance	YES	Binuang Mill and supply base CU SOU 28 have identified all wastes and sources of pollution. The Identification & Management Waste FY 2019 were established to mitigate and control the identified wastes and source of pollution.
	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	YES	Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal.
	5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented Minor Compliance	YES	The waste management and disposal plan to avoid or reduce pollution had been documented and implemented as discussed in Indicator 5.1.3 above. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution on the routine operation.
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	The mill and estates record consumption of diesel and tabulate data against the FFB production. The Energy Management Plan 2019 where the Fossil Fuel reduction / Optimization Plan has been included.
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	Not available.
	5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN	YES	There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.

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Clause	Indicators		Comply Yes/No	Findings																																																	
		Policy on Zero Burning' 2003. Minor Compliance																																																			
C 5.6 Preamble Growers and millers commit to reporting on operational greenhouse gas emissions. However, it is recognised that these significant emissions cannot be monitored completely or measured accurately with current knowledge and methodology. It is also recognised that it is not always feasible or practical to reduce or minimise these emissions. Growers and millers commit to an implementation period until the end of December 2016 for promoting best practices in reporting to the RSPO, thereafter to public reporting. Growers and millers make this	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent.	YES	An assessment of identified polluting activities was being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent.																																																	
	5.6.2	Significant pollutants & GHG emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	YES	Pollution Identification Environmental improvement action plan' has been used to identify the waste products and sources of pollution and actions taken to mitigate and reduce them were in place and are being reviewed accordingly.																																																	
	5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. Minor Compliance	YES	<p><u>Summary of net GHG emissions from PalmGHG calculator</u></p> <p>PalmGHG calculation option used: Option 1</p> <p>Summary of Emissions</p> <table border="1"> <thead> <tr> <th>Description</th> <th>tCO₂e/tProduct</th> <th>Extraction Rate</th> <th>%</th> <th>Production</th> <th>t/yr</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>1.74</td> <td>OER</td> <td>22.44</td> <td>FFB Processed</td> <td>163294.98</td> </tr> <tr> <td>PK</td> <td>1.74</td> <td>KER</td> <td>4.87</td> <td>CPO Processed</td> <td>36647.87</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Land Use</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>OP Planted Area</td> <td>13382.02</td> </tr> <tr> <td>OP Planted on Peat</td> <td>0</td> </tr> <tr> <td>Conservation (forested)</td> <td>0</td> </tr> <tr> <td>Conservation (non-forested)</td> <td>0</td> </tr> <tr> <td>Total</td> <td>13382.02</td> </tr> </tbody> </table> <p>Summary of Plantation/field emissions and sink</p> <table border="1"> <thead> <tr> <th rowspan="2">Description</th> <th colspan="3">Own</th> <th colspan="3">Group</th> </tr> <tr> <th>tCO₂e</th> <th>tCO₂e/ha</th> <th>tCO₂e/tFFB</th> <th>tCO₂e</th> <th>tCO₂e/ha</th> <th>tCO₂e/tFFB</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Description	tCO ₂ e/tProduct	Extraction Rate	%	Production	t/yr	CPO	1.74	OER	22.44	FFB Processed	163294.98	PK	1.74	KER	4.87	CPO Processed	36647.87	Land Use	Ha	OP Planted Area	13382.02	OP Planted on Peat	0	Conservation (forested)	0	Conservation (non-forested)	0	Total	13382.02	Description	Own			Group			tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/tFFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/tFFB						
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Clause	Indicators		Comply Yes/No	Findings						
commitment with the support of all other stakeholder groups of the RSPO. Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.				Land conversion	95079.35	9.71	0.58	72619.3	9.66	95.82
				CO2 emission from fertiliser	10962.21	1.12	0.07	6629.86	0.88	8.75
				N2O emission	7518.99	0.77	0.05	3780.32	0.5	4.99
				Fuel consumption	3254.24	0.33	0.02	1140.69	0.15	1.51
				Peat Oxidation	0	0	0	0	0	0
				Crop sequestration	-89408.21	-9.13	-0.55	-68833.45	-9.16	-90.82
				Sequestration in conservation area	0	0	0	0	0	0
				Total	27406.58	2.8	0.17	15336.72	2.04	20.24
				Summary of Mill emission and credits						
				Description	tCO2	tCO2e/tFFB				
POME	32839.49	0.2								
Fuel Consumption	1952.79	0.01								
Grid Electricity Utilisation	0	0								
Export of Excess Electricity to Housing & Grid	0	0								
Sale of PKS	0	0								
Sale of EFB	0	0								
Total	34792.42	0.21								
Palm Oil Mill Effluent (POME) Treatment										
Diverted to compost	0%									

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Clause	Indicators		Comply Yes/No	Findings	
				Diverted to anaerobic digestion	100%
				POME Diverted to Anaerobic Digestion	
				Diverted to anaerobic pond	100%
				Diverted to methane capture (flaring)	0%
				Diverted to methane capture (electricity generation)	0%

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

Clause	Indicators		Comply Yes/No	Findings
C 6.1 Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance	YES	The Social Impact Assessment (SIA) for SOU 28 Binuang was carried out from 22-27/7/2013. Records of meetings, such as meeting dates with stakeholders, issues raised during the discussions and attendance lists were all documented and sighted during the audit. Among the stakeholders that were consulted included estate workers comprising drivers, sprayers, harvesters, mandores, general workers, loaders, HUMANA teachers, kindergarten teachers, creche workers, etc.
	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	YES	Based on the records available, there was evidence that the assessment was done with the participation of affected parties. Their attendance in stakeholder consultation meetings were documented on attendance sheets and these were sighted during the audit. The issues discussed were also documented in the SIA Report which was carried out from 22-27/7/2013.
	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	Each estate within the SOU 28 Binuang mitigates negative social impacts and promotes positive ones by calling stakeholders for meetings to get their feedbacks and inputs. Discussions were minuted and feedbacks that require actions to be taken were incorporated into the SIA Action Plan. The respective SIA Action Plans identify the issues requiring action/areas of concern, action plan, person-in-charge, expected completion date and remarks.
	6.1.4	The plans shall be reviewed as a minimum once every two years	YES	There was evidence that the SIA Action Plans for estates within SOU28 Binuang are being updated at least once a year, or as and when there are changes. There was also

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Clause	Indicators	Comply Yes/No	Findings
	and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. Minor Compliance		evidence based on meeting minutes that the SIA Action Plans have been updated with participation of the affected parties. Binuang Estate updated its SIA Action Plan on 1/4/2019.
	6.1.5 Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). Minor Compliance	YES	There were no smallholder schemes at SOU 28 Binuang, and therefore this Indicator was not applicable.
C 6.2 There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties	6.2.1 Consultation and communication procedures shall be documented. Major Compliance	YES	For Sime Darby Plantation Group, the consultation and communications procedure for SOU 28 Binuang was documented in the Standard Operating Manual.
	6.2.2 A management official responsible for these issues shall be nominated. Minor Compliance	YES	Letters of appointment for the management official responsible for handling the social issues were available. Each appointment was for a period of one year. Among the roles and responsibilities of the management official are to investigate complaints, counsel and advice on social issues, assist in carrying out programs or trainings on social issues.
	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	NO	The list of stakeholders for SOU 28 Binuang was maintained by the respective sites, and updated when necessary. However, at Binuang Estate, 1) Kedai Binuang was not invited to attend stakeholder meetings, and no evidence of efforts made to ensure understanding by Kedai Binuang as a stakeholder. 2) Estate allowed monthly pasar tamu at the housing complex and for occupants at the housing complex to sell food items from their houses. Kedai Binuang has highlighted that both of these activities have caused their sales to drop. As for Tingkayu Estate, no record of action taken in response to input from stakeholder i.e. regarding need for toys at the Tingkayu Estate creche. Therefore, a Minor Non-Compliance RZ01 of 2019 was raised.
C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and	6.3.1 The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. Major Compliance	YES	The system used by the SOU 28 Binuang in resolving disputes exists in the procedure called "Flowchart and Procedures In handling Social Issues ". The system was open to all affected parties. Grievances from workers are also written in a book entitled Complaints and Grievances.
	6.3.2 Documentation of both the	YES	For all the Mill and Estates under SOU 29 Binuang, as of the date of audit, no dispute has

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Clause	Indicators		Comply Yes/No	Findings
accepted by all affected parties		process by which a dispute was resolved and the outcome shall be available. Major Compliance		been documented, except for complaints on housing defects. A review of the complaints books shows that the complaints were duly attended to, and necessary repair works carried out. There was also a record of acknowledgement by the person making the complaint that the complaint has been resolved.
C 6.4 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. Major Compliance	YES	The procedure for identifying legal, customary or user rights, and compensation process was incorporated in the Sustainable Plantation Management System. The procedures stipulate that ex-workers issues are to be handled by the Employee Relations, and the land issues by the Land Management Department of the Head Office. Both procedures stipulate the negotiation procedures, calculation and distribution of compensation to the affected parties.
	6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants & long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance	YES	In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates for negotiation procedures to involve the respective estate management, Land Office, NGOs and the affected parties.
	6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. Major Compliance	YES	As of the date of the audit, no case of negotiation and payment of compensation has been carried out for verification.
C 6.5 Pay and conditions for employees and for contract workers	6.5.1	Documentation of pay and conditions shall be available. Major Compliance	YES	For the SOU 28 Binnuang, documentation of pay is in the form of monthly pay slips which were given to the workers at the end of the month. Conditions of pay were contained in the workers' respective employment contracts. Samples of the monthly pay slips and employment contracts were made available and reviewed during the audit. Each pay slip

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Clause	Indicators		Comply Yes/No	Findings
<p>always meet at least legal or industry minimum standards and are sufficient to provide decent living wages</p>				<p>contains name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions (statutory deductions such as EPF, SOCSO, EIS, and non-statutory deductions such as donation to mosque funds), net salary, annual leave and medical leave taken, etc. Interview with workers reveal that they understand the contents of the pay slips and seeks explanation from the payroll clerk whenever they needed clarifications.</p>
	6.5.2	<p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment shall be available in the languages understood by the workers or explained carefully to them by a management official. Major Compliance</p>	YES	<p>The terms and conditions of employment were contained in the employment contracts which included the duration of employment, place of work, salary, working hours, medical benefits, accommodation, annual leave, sick leave, termination of service, and other benefits provided (housing, employment cost, annual leave, sick leave, unpaid vacation leave, etc). The contracts were prepared in dual-language, namely English and Bahasa Melayu. Explanation and briefing were given to the workers prior to signing. This was further confirmed by the workers (gardeners, manurers, loose fruit pickers, harvesters) during interviews.</p>
	6.5.3	<p>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 (not applicable to smallholders). Minor Compliance</p>	NO	<p>There was evidence that adequate housing was being provided to all employees of SOU 28 Binuang. Workers interviewed during the audit confirmed that the houses and amenities provided were adequate, comfortable and requests for repairs are attended to in a timely manner. Site visits were carried out to the workers' housing, and it was verified that the houses were generally in a good state of repair. Each house has either 2 or 3 bedrooms and were provided with water and electricity supplies. Water was provided free of charge while electricity subsidised. Treated water to workers' housing was provided on rotational basis i.e. from 1PM to 5PM, and electricity was available from 6PM to 6AM. However, based on interviews, the workers do not see this as an inconvenience because of the availability of water tanks where water can be stored. Other facilities provided for the workers are clinics, community hall, creche for toddlers below 4 years, sundry shops, cafes, netball courts, volleyball courts, as well as a mosque. Based on records reviewed, there is evidence that housing inspections were being carried out at least once a week by the Health Assistant.</p> <p>However, for Jelata Bumi Estate clinic, VMO visits were only made once a month. This contravenes Section 19(3) of the Workers' Minimum Standards of Housing and Amenities Act 1990 which requires for a registered medical practitioner to visit the clinic at least once a fortnight to supervise the operations and management of the clinic and to provide medical treatment to workers and their dependants. Therefore, a Minor Non-Compliance RZ 01 of 2019 was raised.</p>
	6.5.4	<p>Growers and millers shall make demonstrable efforts to monitor and where able, improve workers'</p>	YES	<p>There was evidence that all estates within SOU 28 Binuang has made demonstrable efforts to monitor workers' access to adequate, sufficient and affordable food. This was exhibited by the regular price monitoring of items sold in all the sundry shops within SOU</p>

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Clause	Indicators		Comply Yes/No	Findings
		access to adequate, sufficient and affordable food. Minor Compliance		28 Binuang.
C 6.6 The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.6.1	A published statement in local languages recognising freedom of association shall be available. Major Compliance	YES	Recognition of freedom of association is available in the Sime Darby Plantation Social Policy dated Jan 2015. The policy states that the company respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively.
	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	YES	Meetings were held at least once a year between estate management and their respective SPIEU representatives.
C 6.7 Children are not employed or exploited.	6.7.1	There shall be documentary evidence that minimum age requirements are met. Major Compliance	YES	The policy on non-employment of children was contained in the Sime Darby Social Policy dated Jan 2015. This Policy is displayed at prominent places such as the muster grounds, near the workers' housing, and at the office.
C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. Major Compliance	YES	The equal opportunities policy is contained within the Sime Darby Social Policy dated Jan 2015, which states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Social Policy was displayed at notice boards near the muster grounds, workers' housing and the office.
	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	Apart from the Social Policy which states that all employees shall be treated equally, there was no evidence that there has been any form of discrimination against any employee, or group of employees. Payment of wages/salaries, provision of housing and access to benefits and amenities was fair based on observation, review of pay checks, contracts of employment, and interviews of staff, local and foreign. Foreign workers were also accorded the same living standards and accommodations as local workers.

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Clause	Indicators		Comply Yes/No	Findings
	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	Based on interviews with the estates and mill management and documentation review (interview assessment and medical report), recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness appropriate for the job. There was evidence at SOU 28 Binuang that recruitment selection, hiring are based on skills, capabilities, qualities, and medical fitness.
C 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.	6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	The policy to prevent sexual and other forms of violence is contained in the Sime Darby Social Policy dated Jan 2015. This policy was communicated to all levels of workforce through training held during Gender Refresher for SOU 28 Binuang. The training was attended by 30 participants comprising Quality Assurance personnel, health assistant, Gender Committee members, clerks, Assistant Administration Officers, etc. The topics cover, among other things, policy, functions of the Gender Committee, what are reproductive rights, and child protection. The training also briefed on how to lodge a complaint and to whom. Additionally, the Gender Committees of all estates within SOU 28 Binuang have also been briefing their members on the policy to prevent sexual and other forms of harassment and violence.
	6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	The policy to protect reproductive rights of women is contained in the Sime Darby Plantation Gender Policy. In addition, Gender Committees have been established at all Estates in SOU 28 Binuang. The Gender Committee meetings and muster briefings are being used as an avenue to disseminate information to its members regarding reproductive rights. This was further confirmed during interviews held with female workers (loose fruit pickers/manurers) during field interviews.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. Minor Compliance	YES	A grievance mechanism which respects anonymity and protects complainants was in place at SOU 28 Binuang, as per the Sime Darby Gender Committee Handbook 1st Edition 2014. Employees were aware of the avenue and mechanism for lodging complaint. This was communicated to all staff during muster briefings and training, and confirmed during interviews with the workers.
C 6.10 Growers and millers deal fairly and transparently with smallholders and other local businesses.	6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. Minor Compliance	YES	This Indicator was not applicable as Binuang Palm Oil Mill only receives FFB from its own supply within SOU 28 Binuang, and none from third party suppliers.
	6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and	YES	This Indicator was not applicable because the Binuang Palm Oil Mill only receives FFB from its own supply within SOU 28 Binuang, and none from third party suppliers.

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Clause	Indicators	Comply Yes/No	Findings
	inputs/services shall be documented. Major Compliance		
	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	Based on interviews conducted with suppliers/contractors, there was evidence that they understand their legal obligations under the contractual arrangements, that it was fair, legal and transparent. The interviewees mentioned that due to tough competition, profit margin is low.
	6.10.4 Agreed payments shall be made in a timely manner. Minor Compliance	YES	Ooi Trading confirmed that even if payments were handled by the Sime Darby HQ, there was no delay in payments, and the process was smooth and payments were received within two weeks of the issuance of invoice.
C 6.11 Growers and millers contribute to local Sustainable development where appropriate.	6.11.1 Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. Minor Compliance	YES	There was evidence that any contributions to the local community were based made based on the requests from the local communities, as the case may be.
	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	There was no smallholder scheme for SOU 28 Binuang, and therefore this indicator was not applicable.
C 6.12 No forms of forced or trafficked labour are used.	6.12.1 There shall be evidence that no forms of forced or trafficked labour are used. Major Compliance	YES	Based on interview with workers, review of employment contracts and records of wages, overtime payment, as well as rest day accorded to the workers, there was no evidence of any form of forced or trafficked labour. Workers are free to leave the estate if they so wish, and that their movements were not curtailed. Sime Darby Plantation Berhad also has a written commitment to safeguard against the employment of forced labour. Foreign worker can have an option of either keeping their own passport, or to have their passports kept at the respective estates' offices.
	6.12.2 Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	YES	Based on interviews with foreign workers, all of them were aware of the types of work they would be doing before they arrived in Malaysia. The actual job undertaken was the same as what they were informed of while they were still in their home country. No contract substitution has therefore occurred.
	6.12.3 Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance	YES	The SOU 28 Binuang adopts the Social Policy. Based on observations and interviews of foreign workers (harvesters, sprayers, mill workers), there was no evidence of contract substitution and no discriminatory practices against foreign workers. A post-arrival briefing was also given, in particular on the contents of their employment contracts, safety, benefits, etc.
C 6.13	6.13.1 A policy to respect human rights	YES	The policy to respect human rights was documented in the Sime Darby Plantation's Social

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Clause	Indicators	Comply Yes/No	Findings
Growers and millers respect human rights			and Humanity Management Policy. This Policy states among others, that it will develop its businesses with a sense of humanity, ensuring that they are socially beneficial and do not infringe basic human rights.
	6.13.2	YES	Due to the presence of foreign workers' children, SOU 28 Binuang secures access for these children to education by having HUMANA schools and Community Learning Centres.

Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Auditors has verified through checking the www.globalforestwatch.com, GOOGLE Maps, Estate Maps and also through site visit to the sampled estates area i.e. Binuang, Tingkayu, Sungang and Jeleta Bumi Estate. Based on the audit findings, it was confirmed that there were no new planting or new development of areas at Binuang CU.

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		
	a)	YES	Binuang SOU had adopted several continuous improvement in reducing usage of pesticides i.e. increasing planting of beneficial plants mainly <i>Tunera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> and continue to monitor pest through Early Warning System. The SOU also adopted planting of <i>Legominious</i> Cover Crop mainly <i>Pueraria</i>

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Clause	Indicators	Comply Yes/No	Findings
			<p><i>Javanica</i> and <i>Calopogonium Mucunoides</i> at replanting area in order to minimizing circle and selective weeding.</p> <p><i>Neprolephis biserata</i> was maintained and encouraged to be planted in Binuang SOU. This can be seen in their continuous improvement plan. This was to suppress growth of noxious weeds and thus reduce the use of pesticides for selective weeding. Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced in order to encourage soft grasses in inter row and frond stacking area Mills waste such as EFB were used as fertilizer in the field and for mulching thus reducing weed growth. The SOU had barn owl boxes on Sungang Estate to reduce the usage of rodenticides have been established. The SOU had also advocated the use of Pheromone traps in young replants for control of Rhinoceros Beetles.</p>
	b) Environmental impacts (Criteria 4.3, 5.1 and 5.2);	YES	<p>Environmental impact assessment, management action plans and continuous improvement plan for Binuang SOU 28 has been updated and monitored by management. Among the improvement actions:</p> <ul style="list-style-type: none"> 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	<p>The management of Binuang SOU had plan to reduce emission by among others by daily inspection and monitoring for their farm tractor / lorry and gen set / water treatment plant to prevent any leakage and problem which can impact on smoke emission.</p>
	d) Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	YES	<p>The management of both estates and mill had plan to reduce emission by daily inspection and monitoring for their farm tractor / lorry and gen set / water treatment plant to prevent any leakage and problem which can impact on smoke emission.</p>
	e) Social impacts (Criterion 6.1);	YES	<p>Social impacts were constantly updated based on inputs received from stakeholder consultations/meetings. This was evidenced in the minutes of the following meetings, and the updated Action Plans. These stakeholder meetings include Gender Committee meetings, OSH meetings and meetings with external stakeholders.</p>
	f) Encourage optimising the yield of the supply base. Major Compliance	YES	<p>To As Binuang SOU is 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.</p>

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RSPO Certifications Systems for Principles & Criteria June 2017

Clause	Indicators	Comply Yes/No	Findings
<p>4.5.3 Time-bound plan</p> <p>Note: Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;</p>	<p>(a) As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.</p>	<p>YES</p>	<p>SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.</p> <p>Indonesia PT Mitral Austral Sejahtera PT MAS undergone RSPO Main Assessment in July 2011. The certification body for PT MAS has considered that Sime Darby Plantation still meets the requirements of the RSPO report has been submitted for EB review. A verification audit was conducted by the Certification Body in early 2013 and Sime Darby Plantation will proceed with the next steps of resolution of the matter. Ongoing and regular (bi-monthly) discussions is ongoing between Sime Darby Plantation and the project affected communities. Reports on the progress regular basis since November 2012. The latest progress report submitted to RPSO dated 8 Sept 2017. SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat. As per current status (23/01/2019) SDP and affected parties will be resolved all the issues to proceed with legal review. https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail</p> <p>PT Bahari Gembira Ria 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. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P9000001OioYJEAZ</p> <p>PT Sandika Natapalma & PT Budidaya Agro Lestari Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing.</p> <p>As at June 2017, the smallholders with the total of 29,914 Ha (58% from the total Ha, 51,715 Ha) of associated smallholders in Indonesia has been certified. Certification process for the remaining associated smallholder's areas was on-</p>

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			<p>going. SDP expect to achieve 100% RSPO certification of associated smallholders and out growers by end 2020.</p> <p>PT Bersama Sejahtera Sakti The new project at KKPA Maju Bersama by the plasma community is currently in nursery stage and not yet due for harvesting, the year of planting was in 2014.</p> <p>PT Ladang Rumpun Subu Rubadi SAP 1 Estate PLASMA will be undergone 2nd stage audit on 2019.</p> <p>PT Guthrie Pecconina Sungai Jernih Estate and the KKPA Estates has undergone audit.</p> <p>PT Sime Indo Agro Only East estate not yet certified – land legalization still in progress.</p> <p><u>Liberia</u> SDP has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was only completed conducted and put on-hold due to security & safety issue. After due consideration on the current engagement with the House of Representative in Liberia, SDP management decided to postpone the time bound plan of RSPO Certification to 2019 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process.</p> <p><u>Papua New Guinea (NBPOL)</u> Markham Farming Company Limited (MFCL) / Markham Agro Pte. Ltd. Estimate to be certified on year 2020. The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore, the Remediation and Compensation Procedure will be required to be full filled in order to achieve certification. The Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEIA and LUCA are being undertaken in order to submit and mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration. https://rspo.org/certification/remediation-and-compensation/racp-tracker no 82</p>
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	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	YES	Time bound plan was verified by CB and it can be confirmed that there were no changes to the current time bound plan as verified during this audit.
	(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	There were no changes to the current time bound plan as verified during this audit.
4.5.4 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	YES	Based on internal and external audit (ISPO certified) there was no replacement of primary forest or HCV areas in the uncertified management unit. Except for NBPOL area which have potential liabilities of RSPO grower members and the stages of the Remediation and Compensation Procedures (RaCP) that the management units (MUs) are currently undergoing. https://rspo.org/certification/remediation-and-compensation/racp-tracker no 82
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6;	YES	Regular discussion was ongoing between Sime Darby Plantation and the group of community (PAC) through bi-monthly Tim Kerja Perwakilan Petani (TKPP) meeting since November 2012. In October 2013, representatives from two of nine villages (Kerunang and Entapang) left TKPP. These two villagers are supported by and working with TuK and OXFAM. They have then requested SDP to enter into Dispute Settlement Facility (DSF) in June 2014. Hence, there were two groups of communities: The TKPP (7 of 9 villages) and the Kerunang &

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			Entapang team (2 of 9 villages). 21 TKPP meetings have been conducted. The most recent one was held on 2/11/2016. Issues related to the 14 demands made by TKPP were closed except for two As per current status (23/01/2019) SDP and affected parties will be resolved all the issues to proceed with legal review. https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail								
(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	YES	Based on the internal audit report, there were no labour dispute that are not being resolved through an agreed process for all uncertified units for all 8 uncertified units of Sime Darby Plantation Sdn Bhd - Indonesia as at December 2017.								
(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	Based on internal and external audit (ISPO certified) there was no labour disputed recorded at the CU.								
(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:	YES	SDP PT Mitral Austral Sejahtera already ISPO certified by MUTU Certification International on 30/11/2017 and there was no issue on legal non-compliance for all uncertified unit.								
	<ul style="list-style-type: none"> A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; 	YES	<table border="1"> <thead> <tr> <th>#</th> <th>Name of SOU</th> <th>Name of Units</th> <th>Positive assurance statement and self-assessment</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PT Sime Indo Agro</td> <td>East Sei Mawang</td> <td>Internal assessment was conducted on 29 May – 3 June PT Mutuagung Lestari Auditor</td> </tr> </tbody> </table>	#	Name of SOU	Name of Units	Positive assurance statement and self-assessment	1	PT Sime Indo Agro	East Sei Mawang	Internal assessment was conducted on 29 May – 3 June PT Mutuagung Lestari Auditor
#	Name of SOU	Name of Units	Positive assurance statement and self-assessment								
1	PT Sime Indo Agro	East Sei Mawang	Internal assessment was conducted on 29 May – 3 June PT Mutuagung Lestari Auditor								

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				2	PT Ladang rumpun Subur abadi	Subur Abadi Plasma 1	Internal assessment has been conducted for Subur Abadi Plasma 1 on 22 Feb 2017. The Subur Abadi Plasma 1 Scheme is currently undergoing RSPO Certification under PT Ladangrumpun Suburabadi pending certification. RSPO Pre-assessment has been completed on 20-24 March 2017. The contract between the Certification Body (PT Mutuagung Lestari) and PT Ladangrumpun Suburabadi is available (dated 6 March 2017) which includes the scope of the supply base of Subur Abadi Plasma stated under Clause 2, 1a. There is no outstanding land and social conflicts on the ground. HCV Assessment for Subur Abadi Plasma smallholders have been conducted (by Pollito) in July 2011 before commencement of any new planting. Land Use Change Analysis for the Plasma is in progress.
				3	PT Bersama Sejahtera Sakti	KKPA BSS	New smallholder project currently under preparation to undergo RSPO Certification by 2019, internal audit for PT BSS has been undertaken, the latest internal audit has been conducted on 21 Apr 18.
							There is no outstanding social and land conflicts on the ground. The plasma scheme has already undergone HCV Assessment (conducted by Pollito) in July 2011 before commencement of New Planting. Land Use Change Analysis is in progress.
				4	PT Bahari Gembira Ria	Plasma BGR	Confirmation of the status is in progress. Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P9000001OioYJEAZ https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P9000001OioXOEAZ
				5	PT Guthrie	Sungai Jernih Estate and GPI KKPA	Sungai Jernih Estate and GPI KKPA were audited by Mutuagung as verified through Recertification Audit report. The assessment

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				Pecco nina Indonesia		was conducted on 15 – 20 May 2017.	
			6	PT Mitra Austral Sejahtera (MAS)	MAS 1 MAS 2 MAS 3 Mas Factory Plasma MAS	Internal assessment was conducted on 9 - 10 Nov 2017 by PSQM Indonesia.	
			7	PT Sandika Nata Palma	Karya Palma KKPA SNP	Internal assessment was conducted on 10 Feb 2017.	
			8	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Sungai Putih (PT BAL) Beturus (PT BAL) KKPA BAL	Internal assessment was conducted on 18 - 23 Sept 2016. This PT also has conducted Stage 1 audit on RSPO Certification System, P&C RSPO (2016) and RSPO Supply Chain Certification Standard on 17 – 22 April 2017.	
						Smallholder project – targeted for certification by 2020.	
		<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 	YES	Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report.			
		<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 	YES	It was evident that in handling uncertified management unit, SDP engaged with TuK-Indonesia and continued to work on direct engagement with PAC in order to achieve the consensus with the PAC to address all unresolved issues.			
		<ul style="list-style-type: none"> If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. 	YES	Further information can be obtained from https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail			
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		No additional indicators	YES	As it has been mentioned in 2.2.1 of this checklist, the Land Title for all Estates were verified. It was confirmed that there was no such case concerning the rights of local communities and indigenous peoples at Binuang CU.			

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<p>shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p>				
<p>Note:</p> <ol style="list-style-type: none"> 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. 				

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Attachment 4

Details of Non-conformities and Corrective Actions Taken for RSPO P&C MYNI 2014

P & C Indicator/SCCS Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
4.7.2 NCR RAR 01 2019	Major	Finding : Risk assessment and implementation of SOP at conveyer operation was not complied with. Objective evidence : During site visit at Binuang POM risk assessment at empty bunch conveyer chain were not identified and implement as per SDPB SOP for palm oil mills (guard - moving object), document no: SDP/SOP/01, date established 01/01/2019, version 2.	1. The exposed empty bunch conveyer chain has been covered with expended metal on 25 June 2019. 2. Mill has review the HIRARC for Threshing Station.	Auditor has verified the picture empty bunch conveyer chain has been covered and HIRARC at Threshing Station has been reviewed on 25/5/2019 and approved on 18/6/2019. Status : Closed The effectiveness of Corrective action will be verified during next audit.
4.1.2 NCR MN 01 2019	Minor	Finding : Pesticides stores were not well ventilated Objective evidence : During the site visit to the chemical stores of Jeleta Bumi and Tingkayu Estates, it was found out that a significant chemical odour were detected.	Estate had request from supplier quotation to purchase additional unit of ventilation fan to be install at the chemical store. Estate to ensure ventilation fan to be switch on at least 30 minutes before entering the chemical store.	Corrective Action Plan Accepted Status : Open The effectiveness of Corrective action plan will be verified during next audit.
5.2.4 NCR MZK 01 2019	Minor	Finding : Outcomes of monitoring was not effective. Objective evidence : SOU Binuang – sighted that HCV/RTE monitoring has been done at all estates, However, the outcomes of monitoring was not effective to identify the RTE species.	1. Action plan to identify and protect of wildlife (including RTE Species) in the estate area will be included in the estate's HCV action plan. 2. Any sightings of RTE species in the estate area to be recorded in the HCV monitoring record form/logbook. 3. Training on HCV will be conducted to all workers and person in charge of HCV monitoring.	Corrective Action Plan Accepted Status : Open The effectiveness of Corrective action plan will be verified during next audit.
6.5.3 NCR RZ 01 of 2019	Minor	Finding: 1. Visiting Medical Officer (VMO) visits to the Jelata Bumi Estate clinic does not comply with the requirements of Section 19(3) of the Workers' Minimum Standards of Housing and Amenities Act 1990. Objective evidence:	New letter of appointment for VMO has been issued out by Head Office for Jeleta Bumi Estate and stated the frequency of visit (2 visits a month) with effective from 1st July 219 until 30th June 2022 (3 Years).	Corrective Action Plan Accepted Status : Open The effectiveness of Corrective action plan will be verified during next audit.

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		<p>1. Dates of VMO visits to the Jelata Bumi Estate clinic were as follows: 9 Jan 2019, 13 March 2019, 1 April 2019, 8 May 2019. This contravenes Section 19(3) of the Workers' Minimum Standards of Housing and Amenities Act 1990 which requires for a registered medical practitioner to visit the clinic at least once a fortnight to supervise the operations and management of the clinic and to provide medical treatment to workers and their dependents.</p>		
<p>6.2.3 NCR RZ 02 of 2019</p>	<p align="center">Minor</p>	<p>Finding:</p> <p>1. At Binuang Estate, Kedai Binuang was not invited to attend stakeholder meetings, and no evidence of efforts made to ensure understanding by Kedai Binuang as a stakeholder.</p> <p>2. At Tingkayu Estate, no record of action taken in response to input from stakeholder was maintained.</p> <p>Objective evidence:</p> <p>1. Letters dated 6 Feb 2017, 6 April 2018, and 23 March 2019 sent to stakeholders to attend stakeholder meetings did not include Kedai Binuang as a recipient. There is no evidence to show that efforts are made to ensure Kedai Binuang's understanding of the Estate's decision to allow monthly pasar tamu at the housing complex and for occupants at the housing complex to sell food items from their houses. Kedai Binuang alleged that both these activities have caused their sales to drop which resulted in a grievance. The non-invitation of Kedai Binuang to stakeholder meetings on 9 Feb 2017, 10 April 2018, and 2 April 2019 has resulted in the grievance not channeled and addressed by Binuang Estate.</p> <p>2. No evidence that action has been taken following concerns raised in two consecutive Management Plans on SIA (FY2018-2019 dated 9 Oct 2018 and FY 2019 dated 26 March 2019), regarding need for toys at the Tingkayu Estate creche.</p>	<p>1. Estate to ensure all related parties to be included in the stakeholder list and invited to the stakeholder meeting. Estate to brief the grievances procedure to the stakeholders.</p> <p>2. Estate to ensure SIA action plan to be monitor by updating the status of action plan on yearly basis.</p>	<p>Corrective Action Plan Accepted Status : Open The effectiveness of Corrective action plan will be verified during next audit.</p>

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Attachment 5

RSPO Supply Chain at the Binuang POM – Identity Preserved Model – Module D

SECTION A : GENERAL INFORMATION

1. File Reference No.	: ES10170018
2. Name of facility/ site(s) /entity(ies)	: Sime Darby Plantation Berhad – Binuang POM
3. Site Location (single site/multisite/Group)	: 91207 Kunak, Tawau, Sabah
4. SC model	: Identity Preserved
5. Type of entity	: Mill / Crusher / Refinery / Biodiesel plant / Primary Oleochemical / Secondary Oleochemical / End product manufacturer <i>For oleochemicals and its derivatives, please check the conversion factor against the “RSPO Rules for Oleochemicals and its Derivatives” dated 1st December 2016</i>
6. RSPO Member Number	: 1-0008-04-000-00
7. Annual summary records of certified oil palm products purchased and claimed	: Actual Crop for last year period of April 18 until March 19 CPO Projected: 40,359.63mt PK Projected: 8,630.50 mt CPO Production: 37,613.691mt CPO Claim as Identity Preserved: 19,852.38 mt CPO Claim as Non-RSPO: 17,194.21mt PK Production: 8,273.88 mt PK Claim as Identity Preserved: 7453.50mt PK Claim as Non-RSPO: 694.71 mt

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

	Requirements	Remarks
	Audit Process Requirements – FOR STAGE 2 / RECERTIFICATION AUDIT	
5.3.8	The certification audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization seeking or holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard.	N/A

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Audit Process Requirements – SURVEILLANCE AUDIT		
5.3.26	<p>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.</p> <p>In cases where an organization seeking certification outsources activities to independent third parties, a risk assessment shall be done by the CB to determine whether an audit of the sub-contractor is required. If the outsourced contractor holds RSPO Supply Chain certification, then it does not require an additional audit.</p>	<p>Binuang POM Organizational, management systems and the operational systems, 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.</p> <p>The procedure was kept in file RSPO Supply Chain Manual (SCM/RSPO/SD) Appropriate changes were also made in the change to include the new clause Production of ISCC certified Waste/Residue Materials at the Mill. There was no evidence that Binuang POM seeking certification outsources activities to independent third parties.</p>

SECTION B (ii): GENERAL CHAIN OF CUSTODY REQUIREMENTS FOR THE SUPPLY CHAIN

	Requirements	Remarks
1	Applicability of the general chain of custody requirements for the supply chain	
1.1	<p>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.</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - For client with SG or IP in the scope, check the weighbridge system, packaging, receiving, loading and storage facility area. 	Binuang 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 Binuang POM is a 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 membership no : 1-0008-04-000-00 Registered under parent company: SIME DARBY PLANTATION BERHAD
1.4	Processing aids do not need to be included within an organization's scope of certification.	No processing aid involved in Binuang 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	Binuang POM has aware on the need to downgrading of supply chain model. Incoming FFB and products dispatch record was verified and confirmed no downgrading was

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	done in the following order: Identity Preserved -> Segregated -> Mass Balance. <u>Additional Guidance:</u> - For MB check the conversion factor used and the mass balance table.	implemented.
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Binuang POM has continued to maintain Identity Preserved 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:	Binuang POM had revised their documented procedure title ' <i>Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001</i> ', version 2, issue no 5 dated April 2019.
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 April 2019 (issue no: 5) The Procedure was sighted and found all elements of the RSPO Supply Chain standard were covered.
b)	Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	Sighted CPO and PK production record, weighbridge report, dispatch record and training record was up to date and well maintained.
c)	Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard.	The Assistant Engineer have overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Binuang POM. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements.
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 Jan 2019 by the internal auditor team. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 1 Major nonconformance report (NCR) were raised by auditor and closed in March 2019 was sighted by auditor.
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:	Binuang POM had continued received FFB supply from own company estate namely Binuang Estate, Sungang, Tingkayu and Jeleta Estate and diversion Crop from SOU Giram.

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	<ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number. <p>Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</p>	<p>Sighted FFB consignment note for Binuang Estate, Sungang, Tingkayu and Jeleta Estate and diversion Crop from SOU Giram. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight.</p>
a)	<p>The site shall have documentation that demonstrate that purchases are made to the material category agreed with their supplier (IP, SG or MB).</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Obtain list of all suppliers and list of purchase orders/invoices issued to the suppliers - Check for agreement/contracts signed with suppliers - Sampling of purchase orders/invoices shall be done on a random basis and the minimum number of samples selected shall be based on the square root formula for each suppliers. - Ensure the purchase orders/invoices have the supplier's Supply Chain number. 	<p>Binuang POM had continued received source of RSPO certified FFB from own group estate.</p> <p>Binuang POM has continued to implement and comply with the procedure in handling of purchasing and receiving as per RSPO standard requirements. Among the samples of all document related to incoming FFB from Binuang Estate, Sungang, Tingkayu and Jeleta Estate and diversion Crop from SOU Giram.</p>
b)	<p>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.</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Request the PIC to demonstrate the use of the RSPO IT platform. 	<p>Binuang POM has registered in IT platform RSPO membership no : 1-0008-04-000-00</p>
c)	<p>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.</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Request for list of suppliers 	<p>Binuang POM had continued received FFB supply from own company estate namely Binuang Estate, Sungang, Tingkayu and Jeleta Estate and diversion Crop from SOU Giram.</p>

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	- Request the PIC to demonstrate where in the RSPO IT platform this can be found.	
4.2	The site shall have a mechanism in place for handling non-conforming material and/or documents.	Binuang 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 Binuang POM, 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.
5	Outsourcing activities	
5.1	<p>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.</p> <p><i>This requirement should not apply to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the organization (not the tank farm manager).</i></p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Request for list of appointed subcontractors - Check on the availability of signed agreement or contract on the outsourced activity. 	There was 1 outsource company CPO and PK transporter i.e. Rimbun Hijau. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training was sighted.
5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <ol style="list-style-type: none"> a) The site has legal ownership of all input material to be included in outsourced processes; b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The responsibility is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all 	<ol style="list-style-type: none"> a) There was 1 outsource company CPO and PK transporter i.e. Rimbun. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training was sighted. b) There is contract document between Binuang POM and the transporters. c) The RSPO Supply Chain procedure has described on outsource activity. d) Inspection was carried out as additional effort to ensure no contamination sighted book at AP Post.

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	<p>information, when this is announced in advance.</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Check the signed agreement has included a provision as required in para (d) of this requirement. 	
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 in the List of CPO & PK Transportation Year 2019.
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	<p>The organization shall ensure that the following minimum information for RSPO certified products is made available in document form. Information must be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number; • A unique identification number. <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Sampling of shipping documents shall be done on a random basis and the minimum number of samples selected shall be based on the square root formula for each customer - Conduct traceability verification during the audit. 	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 Binuang POM.
7	Registration of transactions	
7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> • are supply chain actors between the mill and final refinery; • take legal ownership and physically handle RSPO Certified Sustainable oil palm products; and 	Binuang POM has legal ownership and physical handle RSPO certified sustainable CPO and PK.

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	<ul style="list-style-type: none"> are part of the supply chain of RSPO Certified Sustainable oil palm products <p>must register their transaction in the RSPO IT platform at the time of physical shipment as required by the rules set by RSPO.</p>	
8	Training	
8.1	<p>The organization shall have a defined training plan, which is subject to on-going review and is supported by records of the training provided to staff.</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Availability of an approved annual training plan; and - Training record (training attendance list) 	<p>Training plan has included the RSPO Supply chain training scheduled in March 2019 for staff & workers. However training has been conduct in January 2019.</p>
8.2	<p>Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification system.</p> <p>Training shall be specific and relevant to the task(s) performed.</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Request the list of personnel involved in managing the RSPO SC system in the company - Check the training identified for the personnel and interview to verify the effectiveness of the training - Request for the training materials and check on the training effectiveness. 	<p>Training was conducted for Staff in Jan 2019. Attendance list & photograph was seen.</p>
9	Record keeping	
9.1	<p>The site shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p>	<p>Sighted CPO and PK delivery note, weighbridge ticket, production data and internal audit records were found up-to-date.</p>
9.2	<p>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.</p>	<p>Relevant record was maintained for more than 2 years</p>
9.3	<p>The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.</p>	<p>Binuang POM has projection record calculated from Black Bunch Census and allocated by the budget and the record was updated by year when do the budget.</p>
10	Conversion factors	

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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). <u>Additional Guidance:</u> - For secondary oleoderivatives – the quantity based on molecular weight relative (refer to table 4 of the RSPO Rules for Oleochemicals and its Derivatives) to the primary oleochemical feedstock	OER and KER used as conversion factor.
10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate. <u>Additional Guidance:</u> - Request client to demonstrate the conversion factor used and check the mass balance table.	Actual, monthly updated.
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. BPOM has not use any RSPO trademark.
	RSPO RULES ON COMMUNICATIONS AND CLAIMS – General corporate communications – NOT CARRIED OUT BY BINUANG CU HENCE THESE CLAUSES WERE NOT APPLICABLE TO THEM.	
12	Complaints	
12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints. <u>Additional guidance</u> - Procedure shall cover complaints from customers and stakeholders.	Binuang POM has established documented procedure to address collecting and resolving the complaint. As stated in clause 19.0 Complaints in the SOP for Supply Chain and Traceability.
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 as stated in clause 19.0 Management Review in the SOP for Supply Chain and Traceability.
13.2	The input to management review shall include information on: • Results of internal audits covering RSPO SCCS • Customer feedback	Management review meeting dated in May 2019 (combine RSPO/MSPO SC) • Internal audit – 1 Major NCR • Customer feedback – data analysis show result from customer survey (i.e. RSPO-

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	<ul style="list-style-type: none"> • Status of preventive and corrective actions • Follow-up actions from management reviews • Changes that could affect the management system • Recommendations for improvement 	<p>CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result achieved.</p> <ul style="list-style-type: none"> • Previous meeting – was highlighted • Changes • Recommendation for improvement – improve the established system
13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes • Resource needs 	<p>Recommendation for improvement – improve the established system and maintain the current documents. Resource sufficient.</p>

Binuang palm oil mill – Identity Preserved Model –Module D

D 3 D 3.1	<p>Documented procedures The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements in these requirements; The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard. 	<ol style="list-style-type: none"> Binuang POM had revised their documented procedure title '<i>Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001</i>', version 2, issue no 5 dated April 2019 The Assistant Engineer have overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Binuang POM. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements.
D 3.2	<p>The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>Clause 7.0 of <i>SOP for Sustainable Supply Chain and Traceability</i> issue no 5 has described how the Binuang POM manages the FFB from certified source. It was confirmed that no non-certified FFB was received by Binuang POM.</p>
D.4 D.4.1	<p>Purchasing and goods in The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p>	<p>Binuang POM will only accept the RSPO certified FFB which are from Sime Darby's own estates i.e. Binuang Estate, Sungang, Tingkayu and Jeleta Bumi Estate and diversion Crop from SOU Giram. Monitoring records titled as "<i>RSPO & MSPO Mass Balancing Records for Oil Mills</i>" has recorded the tonnage of certified FFB and its supplying estate.</p>
D 4.2	<p>The site shall inform the CB immediately if there is a projected overproduction.</p>	<p>Based on records of FFB received and CPO & PK produced, there was no overproduction observed.</p>
D.5 D.5.1	<p>Record keeping The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</p>	<p>Binuang POM has maintained the three-monthly accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record titled as "<i>RSPO & MSPO Mass Balancing Records for Oil Mills FY 2018/2019</i>".</p>

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D 6 D.6.1	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from noncertified material including during transport and storage.	Global Trading & Marketing (GTM) Ara Damansara office informed Sime Darby Plantation Sdn.Bhd – Kunak Bulking Installation (KBI) by e-mail on the dispatch of RSPO certified CPO from the supplying POMs (Binuang). The dispatch of the RSPO certified CPO to KBI by the supplying POMs was made based on a specific contract.
D.6.2	The objective is for 100 % segregated material to be reached.	Binuang POM does not accept any non-certified FFB. It was confirmed through summary of weighbridge ticket and interview with weighbridge operator. Therefore, CPO and PK can be considered 100% segregated.

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Attachment 6

Status of Non-conformities Previously Identified

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
Indicator 4.1.1 NCR No: MRS 01/2018	Major	Finding : Certain requirement stated in the operating procedure entitled ' <i>Ladang Binuang, Arahkan Tetap – Mandor Operasi Penyelenggaraan Kebun</i> ' was not complied with. Objective evidence : inuang Estate: Site visit observed 7 children cycling at field road at replanting area.	<ol style="list-style-type: none"> 1. Estate has constructed boundary trenches between field and linesite area. 2. Installation of gates to prevent from unauthorized person especially children from entering the respective field/working area. 3. Briefing has been given to all workers during morning muster dated 21 April 2018 due to prohibition for children from using field road for any kind of activities. 	<p>The estates have taken the following measures;</p> <ul style="list-style-type: none"> - Binuang Estate has constructed boundary trenches between field and line site complex. Similarly all the other 3 estates constructed the same with some stretch equipped with fencing to prevent the free movement of young dependent to enter the fields areas. - There was in addition Installation of gates to prevent from unauthorized person especially children from entering the respective field/working area. This was sighted in the visited estates. Movement of unauthorised young dependents were not noted during the site visit. If any there are accompanied or transported by their parents - Briefing has been given to all workers during morning muster dated 21 April 2018 emphasizing the prohibition for children from using field road for any kind of activities. <p>Status: Closed.</p>
Indicator 6.5.2 NCR No: RZ 01/2018	Major	Finding: a) Employees' conditions of employment (i.e. working hours) was not explained carefully to the relevant workers. Objective evidence: Letter dated 12 September 2013 sent to two female employees entitled "Masa lanjutan (overtime) di Timbangan	<ol style="list-style-type: none"> 1. Binuang POM management has made an amendment on the two (2) female employees work contract agreement which include the clause from Section 75(1) Sabah Labour Ordinance and has been explained and accepted by the said employees on 15 May 2018. 2. Binuang POM management has submitted 	<p>Auditor has verify:</p> <ul style="list-style-type: none"> - Contract two (2) female weighbridge work contract agreement which include the clause from Section 75(1) Sabah Labour Ordinance and has been explained and accepted by them on 15 May 2018. - And auditor also verify the permit wanita bekerja malam Seksyen 75 Ordinan

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		(Weighbridge), KKS Binuang” does not explain that the overtime working hours is subjected to the Sabah Labour Ordinance Chapter XIA Employment of Women – Prohibition of Night Work. (Section 75 (1) SLO).	an application to Kunak Labour Office for female employees working time extension exceeding 10PM on 15 May 2018 and has been duly received by them on 16 May 2018.	buruh (Sabah Bab 67) validity 3/7/18-02/7/20. Status: Closed
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Attachment 7

**RSPO Certification Timebound Plan for Sime Darby Plantation (SDP)
As at Oct 2018**

MALAYSIA

No	Management Unit	Supply Base	Location	Certified Date	Remarks
	SOU Name				
1	Sg. Dingin	Sungai Dingin Oil Mill	Karangan, Kedah	12-Aug-11	
		Anak Kulim Estate			
		Sungai Dingin Estate			
		Somme Estate			
		Bukit Selarong Estate			
		Padang Buluh Estate			
		Bukit Hijau Estate			
Jentayu Estate					
2	Chersonese	Chersonese Oil Mill	Kuala Kurau, Perak	5-Oct-11	
		Chersonese Estate			
		Kalumpong Estate			
		Tali Ayer Estate			
		Holyrood Estate			
3	Elphil	Elphil Oil Mill	Sg Siput, Perak	18-Jun-11	
		Kamuning Estate			
		Elphil Estate			
		Kinta Kellas Estate			
4	Flemington	Flemington Oil Mill	Teluk Intan, Perak	5-Oct-11	
		Flemington Estate			
		Bagan Datoh Estate			
		Sabak Bernam Estate			

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		Sg. Samak Estate			
		Seri Intan Oil Mill			
		Selaba Oil Mill			
		Seri Intan (+ Selaba) Estate			
5	Seri Intan/Selaba	Sabrang Estate	Teluk Intan, Perak	3-Mar-11	
		Sogomana Estate			
		Sg. Wangi Estate			
		Bikam Estate			
		Cluny (+ Bedford) Estate			
6	Tennamaram	Tennamaram Oil Mill	Bestari Jaya, Selangor	3-Mar-11	
		Tennamaram Estate			
		Sungai Buluh Estate			
		Bukit Talang Estate			
7	Bkt Kerayong	Bukit Kerayong Oil Mill	Kapar, Selangor	15-Apr-11	
		Bukit Kerayong Estate			
		Bukit Cheraka Estate			
		Elmina Estate			
8	East	East Oil Mill	Carey Island, Selangor	19-May-10	
		East Estate			
		Sepang Estate			
		Dusun Durian Estate			
9	West	West Oil Mill	Carey Island, Selangor	19-May-10	
		West Estate			
10	Bukit Puteri	Bukit Puteri Oil Mill	Raub, Pahang	7-Jul-11	
		Bukit Puteri Estate			
		Kerdau Oil Mill			
		Kerdau Estate			

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11	Kerdau	Jentar Estate	Temerloh, Pahang	7-Jul-11	
		Mentakab Estate			
		Chenor Estate			
		Sg Mai Estate			
12	Jabor	Jabor Oil Mill	Kuantan, Pahang	7-Jul-11	
		Jabor Estate			
13	Labu	Labu Oil Mill	Nilai, Negeri Sembilan	30-Dec-11	
		Labu Estate			
		New Labu Estate			
14	Tanah Merah	Tanah Merah Oil Mill	Port Dickson, Negeri Sembilan	19-May-10	
		Tanah Merah Estate			
		Bukit Pelandok Estate			
15	Sua Betong	Sua Betong Oil Mill	Port Dickson, Negeri Sembilan	18-Feb-14	
		Sua Betong Estate			
		Sengkang Estate			
		Bradwall Estate			
		PD Lukut Estate			
		Tampin Linggi Estate			
		Sg. Bahru Estate			
		Salak Estate			
Siliau Estate					
16	Kok Foh	Kok Foh Oil Mill	Bahau, Negeri Sembilan	7-Jul-11	
		Muar River Estate			
		Sg. Senarut Estate			
		Sg. Gemas Estate			
		Kok Foh Estate			
		Bukit Pilah Estate			
		St. Helier Estate			
		Sungai Sabaling Estate			

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		Pertang Estate			
17	Kempas	Kempas Oil Mill	Jasin, Melaka	19-May-10	
		Kempas Estate			
		Tangkah Estate			
		Kemuning Estate			
18	Diamond Jubilee	Diamond Jubilee Palm Oil Mill	Jasin, Melaka	5-Oct-11	
		Serkam Estate			
		Diamond Jubilee Estate			
		Bukit Asahan Estate			
19	Pagoh	Pagoh Oil Mill	Muar, Johor	28-Jan-14	
		Pagoh Estate			
		Welch Estate			
		Lanadron Estate			
		Pengkalan Bukit Estate			
20	Chaah	Chaah Oil Mill	Chaah, Johor	18-Nov-10	
		Chaah Estate			
		Sg. Simpang Kiri Estate			
		North Labis Estate			
21	Gunung Mas	Gunung Mas Oil Mill	Kluang, Johor	19-May-10	* SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bk Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been incorporated in the RSPO Certification Scope of Gng. Mas.
		Gunung Mas Estate			
		Kempas Klebang Estate			
		Bukit Paloh Estate			
		Yong Peng Estate			
22	Bukit Benut	Bukit Benut Oil Mill			* SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2018.
		Bukit Benut Estate			
		Lambak Elaeis Estate			

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		CEP Nyior Estate			
23	Ulu Remis	Ulu Remis Oil Mill	Layang-layang, Johor	11-Apr-11	
		Ulu Remis Estate			
		Cenas Estate			
		Bukit Badak Estate			
		Tun Dr. Ismail Estate			
		Pekan Estate			
		Sembrong Estate			
24	Hadapan	Hadapan Oil Mill	Layang-layang, Johor	29-Mar-11	
		Sri Pulau Estate			
		Kulai Estate			
		Layang Estate			
		CEP Renggam Estate			
26	Sandakan Bay	Tun Tan Siew Sin	Sandakan, Sabah	1-Oct-08	
		Tunku Estate			
		Tigowis Estate			
		Sentosa Estate			
		Segaliud Estate			
27	Melalap	Melalap Oil Mill	Tenom, Sabah	21-Jan-11	
		Melalap Estate			
		Sapong Estate			
28	Binuang	Binuang Oil Mill	Kunak, Sabah	16-Jan-09	
		Binuang Estate			
		Sungang Estate			
		Tingkayu Estate			
		Jeleta Bumi Estate			
29	Giram	Giram Oil Mill	Kunak Sabah	16-Jan-09	
		Giram Estate			
		Mostyn Estate			

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30	Merotai	Merotai Oil Mill	Tawau, Sabah	16-Jan-09	
		Merotai Estate			
		Imam Estate			
		Tiger Estate			
		Table Estate			
		Lavang Oil Mill			
		Lavang Estate			
		Rasan Estate			
		Belian Estate			
		Kelida Estate			
		31			
		Pekaka Estate			
		Ruai Estate			
		Dulang Estate			
		Charquest Estate			
		Paroh Estate			
32	Rajawali	Rajawali Oil Mill	Bintulu, Sarawak	30-Dec-11	
		Rajawali Estate			
		Samudera Estate			
		Semarak Estate			
		Bayu Estate			
33	Derawan	Derawan Oil Mill	Bintulu, Sarawak	30-Dec-11	
		Derawan Estate			
		Sahua Estate			
		Takau Estate			
		Damai Estate			
34	Bintang	Bintang Oil Mill	Johor	NA	* SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1st Oct 2018, the mill

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has completed the selling off transaction.

INDONESIA

No	Management Unit SOU Name	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
1	PT LAHAN TANI SAKTI	Alur Damai Mill	-	Rokan Hilir District – Riau	Certified	16-Jan-12	
		Mustika Mill	-		Certified		
2	PT SAJANG HEULANG	KKPA-2 PT.SHE Estate	-	Tanah Bumbu District – South Kalimantan	Certified	3-Jul-13	
		KKPA-3 PT.SHE Estate	-		Certified		
		KKPA-5 PT.SHE Estate	-		Certified		
		Angsana Mill	-		Certified		
		Pantai Bonati Estate	-		Certified		
3	PT LADANGRUMPUN SUBURUBADI	Gunung Sari Estate	-	Tanah Bumbu District – South Kalimantan	Certified	9-Nov-16	
		SAP 1 Estate	2019		ST-2		LSI Plasma has been audited by the Certification Body.
		KKPA-1 PT.SHE Estate	-		Certified		
		KKPA-4 PT.SHE Estate	-		Certified		
		Bebunga Mill	-		Certified		
4	PT LANGGENG MUARAMAKMUR	Sungai Cengal Estate	-	Kotabaru District – South Kalimantan	Certified	16-Mar-12	
		Bakau Estate	-		Certified		
		KKPA Sungai Cengal Estate	-		Certified		
		Sukamandang Mill	-		Certified		
5	PT KRIDATAMA LANCAR	Sapiri Estate	-	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	2-Sep-16	
		Barasdanum Estate	-		Certified		
		Kuala Kuayan Estate	-		Certified		
6	PT BAHARI GEMBIRA RIA	Ladang Panjang Mill	-		Certified	9-Jul-12	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

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							Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P9000001OioYJEAZ
		Ladang Panjang		Muaro Jambi District – Jambi	Certified		
		Plasma BGR Estate	2020		-		
		Manggala Mill	-		Certified		
7	PT TUNGGAL MITRA PLANTATIONS	Manggala 1 Estate	-	Rokan Hilir District – Riau	Certified	25-Nov-10	
		Manggala 2 Estate	-		Certified		
		Manggala 3 Estate	-		Certified		
		Pondok Labu Mill	-		Certified		
		Pondok Labu	-		Certified		
8	PT PARIPURNA SWAKARSA	Binturung Estate	-	Kotabaru District – South Kalimantan	Certified	16-Mar-12	
		Rampa Estate	-		Certified		
		Sesulung Estate	-		Certified		
		Gunung Aru Mill	-		Certified		
		Gunung Aru Gunung Kemas Estate	- -		Certified Certified		
9	PT BERSAMA SEJAHTERA SAKTI			Kotabaru District – South Kalimantan		21-Oct-16	Nursery stage and not yet due for harvesting, the year of planting was in 2014.
		Laut Timur Estate	-		Certified		
		Pantai Timur Estate	-		Certified		

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		KKPA MBP	2019		-		
		Rantau Panjang Mill	-		Certified		
		Rantau Panjang	-		Certified		
		Bumi Ayu Estate	-		Certified		
10	PT GUTHRIE PECCONINA	Karang Ringin Estate	-	Musi Banyuasin District – South Sumatera	Certified	16-Mar-12	Sungai Jernih Estate and the KKPA Estates has undergone audit.
		Napal Estate	-		Certified		
		Mangun Jaya Estate	-		Certified		
		Sungai Jernih Estate and GPI KKPA Estate	2020				
		Rantau Mill	-		Certified	30-Dec-11	
		Rantau	-		Certified		
11	PT LAGUNA MANDIRI	Betung	-	Kotabaru District – South Kalimantan	Certified		
		Matalok Estate	-		Certified	1-Apr-14	
		Sekayu Estate	-		Certified		
		Sekunyir Mill	-		Certified		
12	PT INDOTRUBA TENGAH	Sekunyir	-	Seruyan and West Kotawaringin District – Central Kalimantan	Certified	23-Nov-10	
		Seruyan Estate	-		Certified		
		Selabak Mill	-		Certified		
		Selabak	-		Certified		
13	PT SWADAYA ANDIKA	Randi Estate	-	Kotabaru District – South Kalimantan	Certified	16-Mar-12	
		Sangkoh Estate	-		Certified		
		Lanting Estate	-		Certified		
		Sungai Pinang Mill	-		Certified		
14	PT BINA SAINS CEMERLANG	Sungai Pinang	-	Musi Rawas District – South Sumatera	Certified	11-Sep-12	
		Bukit Pinang Estate	-		Certified		
		Pemantang Mill	-		Certified		

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		Pemantang	-		Certified		
15	PT TEGUH SEMPURNA	Kawan Batu Estate	-	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	9-Sep-16	
		Hatan Tiring Estate	-		Certified		
		Batang Garing Estate	-		Certified		
		Teluk Bakau Mill	-		Certified	1-Dec-16	
		Teluk Bakau	-		Certified		
16	PT BHUMIREKSA NUSA SEJATI	Mandah	-	Indra Giri Hilir District – Riau	Certified		
		Nusa Lestari Estate	-		Certified		
		Nusa Perkasa Estate	-		Certified	1-Apr-14	
		Rotan Semelur Estate	-		Certified		
		Teluk Siak Mill	-		Certified		
17	PT ANEKA INTIPERSADA	Teluk Siak	-	Pekanbaru, Siak District – Riau	Certified	8-Dec-16	
		Pinang Sebatang Estate	-		Certified		
		Aneka Persada Estate	-		Certified		
		Ungkaya Mill	-		Certified		
18	PT TAMACO GRAHA KRIDA	Ungkaya	-	Morowali District – Sulawesi Tengah	Certified	10-Jul-12	
		Plasma TGK Estate	-		Certified		
		Bukit Ajong Mill	-		Certified		
		West Estate	-		Certified		
19	PT SIME INDO AGRO	East Estate	-	Sanggau District –West Kalimantan	Certified	18-Jul-16	
		East* Estate	2019		-		Land legalisation process is still in process
		East Plasma Estate	-		Certified		
		West Plasma Estate	-		Certified		
		Blang Simpo Mill	2020		Certified		
		Tamiang (PT PPP) Estate	-		Certified		

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20	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	Batang Ara (PT PSK) Estate	-	Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam	Certified	3-May-13	
		Blang Simpo-01 Estate	-		Certified		
		Blang Simpo-02 Estate	-		Certified		
		Lembiru Mill	-		Certified		Perijinan' process is ongoing
		Lembiru	-		Certified		
21	PT SANDIKA NATAPALMA	Awatan Estate	-	Ketapang District – West Kalimantan	Certified		
		Karya Palma Estate	2019		-		
		KKPA SNP Estate	2020		-	3-Jul-14	
		Pelanjau (PT BAL) Estate	2019				Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing
		Sungai Putih (PT BAL) Estate	2019				
22	PT BUDIDAYA AGRO LESTARI			Ketapang District – West Kalimantan	-		
		Beturus (PT BAL) Estate	2019		-		
		KKPA BAL Estate	2020		-		
		MAS Mill	2019		-		The case is under RSPO Complaints Panel
		MAS 1 Estate	2019		-		
23	PT MITRAL AUSTRAL SEJAHTERA	MAS 2 Estate	2019	Sanggau District – West Kalimantan	-	NA	Please find latest information on 'Updates on PT MAS' worksheet
		MAS 4 Estate	2019		-		
		Plasma MAS Estate	2020		-		

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INDONESIA – PT MAS UPDATE

RSPO Certification Target Date for PT MAS	The target date for certification is by 2017 subject to the progress of the matter being resolved.
Overview of RSPO Certification Progress for PT MAS	<p>PT MAS has undergone RSPO Main Assessment in July 2011. The certification body for PT MAS has considered that Sime Darby Plantation still meets the requirements of the RSPO report has been submitted for EB review. A verification audit was conducted by the Certification Body in early 2013 and Sime Darby Plantation will proceed with the next steps of resolution of the matter. Ongoing and regular (bi-monthly) discussions is ongoing between Sime Darby Plantation and the project affected communities. Reports on the progress regular basis since November 2012. The latest progress report submitted to RPSO dated 8 Sept 2017.</p> <p>SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat.</p>
Progress Updates	<p>Progress Update for PT MAS</p> <p>Regular discussion is ongoing between Sime Darby Plantation and the group of community (PAC) through bi-monthly Tim Kerja Perwakilan Petani (TKPP) meeting since November 2013. In October 2013, representatives from two of nine villages (Kerunang and Entapang) left TKPP. These two villagers are supported by and working with TuK and OXFAM. They have Dispute Settlement Facility (DSF) in June 2014. Hence, there are two groups of communities: TKPP (7 of 9 villages) and Kerunang & Entapang (2 of 9 villages). To-date, 28 TKPP meetings have been conducted. Issues related to the 14 demands are closed except for two items related to land matters which is ownership of nucleus plant and allocation of plasma farm within the plasma original village/customary area. The most recent meeting was held on 27 July 2018.</p> <p>SDP is engaging with the local authority on this matter together with TKPP. The latest TKPP meeting discussed mainly on operational issues especially on security issues.</p> <p>Engagement with RSPO: Sime Darby Plantation is submitting a monthly basis report to RSPO on the case. Five monthly updates/ responses have been submitted to RSPO to-date. It is noted that on 26 September 2017, the Complaints Panel has convened and has issued a letter related to the issue of Sime Darby's plans to divest its operations.</p> <p>On 3 October 2017, the Complaints Panel's issued a response on Sime Darby's plans to divest its operations (PT MAS). To-date, Sime Darby Plantation is submitting monthly updates/responses to RSPO Secretariat on the matter with the latest submission on 28 May 2018.</p> <p>RSPO has written to SDP on 17 Aug 2018 mentioning that the Complaints Panel as part of its deliberation had directed both parties, the Communities (supported by TuK) and Sime for a meeting for the purposes of verifying the progress of the complaints, specifically the status of the 14 demands. The tripartite meeting between the communities, SDP and RSPO.</p> <p>Engagement with TuK-Indonesia: SDP continues to work on direct engagement with PAC – working towards a consensus with the PAC to resolve the issues. Further information can be obtained from http://www.rspo.org/members/complaints/status-of-complaints/view/29</p>

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NBPOL

Management Unit	SOU Name	Time Bound Plan	Location	Status	Certified Date	
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	NA	Guadalcanal Province, Solomon Islands	Certified	18-Mar-11
		Tetere Estate				
		Ngalimbiu Estate				
		Mbalisuna Estate				
		Outgrowers – West Zone				
		Outgrowers – Central Zone				
		Outgrowers – MBA East Zone				
Outgrowers – MBE East Zone						
2	Milne Bay Estates (MBE)	Hagita Oil Mill				
		Giligili Estate				

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		Waigani Estate	NA	Milne Bay Province, Papua New Guinea	Certified	15-Feb-18
		Sagarai Estate				
		Padipadi Estate				
		Mariawatte Estate				
		East Gurney Estate				
		West Gurney Estate				
		East Sagarai Estate				
		West Sagarai Estate				
3	Poliamba (POL)	Poliamba Oil Mill	NA	New Ireland Province, Papua New Guinea	Certified	19-Mar-12
		Kara Estate				
		Nalik Estate				
		West Coast Estate				
		Noatsi Estate				
		Madak Estate				
		North Smallholders (613)				
		South Smallholders (863)				
		West Smallholders (309)				
4	Ramu Agricultural Industries Ltd (RAIL)	Gusap Mill	NA	Morobe Province, Papua New Guinea	Certified	5-Aug-10
		Gusap East (Gusap) Estate				
		Gusap West (Paddock) Estate				
		Surinam Estate				
		Dumpu Estate				
		Ngaru Estate				
		J Estate (Jephcott) Estate				
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	NA	Oro Bay Province, Papua New Guinea	Certified	1-Feb-13
		Mamba Oil Mill				
		Embi Estate				
		Ambogo Estate				

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		Sangara Estate				
		Sumbiripa Estate				
		Mamba Estate				
		Mosa Oil Mill				
		Kumbango Oil Mill				
		Kapiura Mill				
		Numundo Mill				
		Waraston Mill				
		Bebere Estate				
		Kumbango Estate				
		Togulo Estate				
		Dami Estate				

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No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date
	SOU Name					
6	West New Britain (WNB)	Waisisi Estate	NA	Kimbe, West New Britain, Papua New Guinea	Certified	10-Sep-08
		Kautu Estate				
		Karaisu Estate				
		Moroa Estate				
		Bilomi Estate				
		Loata Estate				
		Haella Estate				
		Garu Estate				
		Daliavu Estate				
		Sapuri Estate				
		Malilimi Estate				
		Rigula Estate				
		Nomundo Estate				
		Navarai / Karato ME /KDC EU Estate				
		Volupai / Lotomgam / Natupi / Goruru Estate				
		Lolokoru Estate				
7	Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Munum Estate	Sep-20	Markham Farms,	RaCP	The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore, the Remediation and Compensation Procedure will be required to be fulfilled in order to achieve certification. The Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEJIA and LUCA are being undertaken in order to submit and
		Tamare Estate				

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		Erap Estate	Sep-20		RaCP	mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration.
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LIBERIA

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Remarks
	SOU Name					
1	Sime Darby Plantation (Liberia) Grand Cape Mount	Grand Cape Mount Mill	2019	Grand Cape Mount County	Not yet Certified	<p>In May – September 2011, SDPL has undergone a series of assessment including Social and Environmental Impact Assessment and High Conservation Value. Assessment in conformance with the RSPO New Planting Procedures to begin planting. *Note: RSPO NPP Announcements can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14? SDPL has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was only completed conducted and put on-hold due to security & safety issue. After due consideration on the current engagement with the House of Representative in Liberia, SDP management decided to postpone the time bound plan of RSPO Certification to 2019 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process.</p>
		Boni Estate				
		Lofa Estate				
		Matambo Estate				
		Grand Cape Mount Estate				