



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

File Ref. : ES10170016

RSPO PUBLIC SUMMARY REPORT

CLIENT : GIRAM STRATEGIC OPERATING UNIT – SOU 29 GIRAM

PARENT COMPANY : SIME DARBY PLANTATION BERHAD

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

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

| Certification Unit | Mill and Supply Base | GPS Location | | Location |
|--------------------|----------------------|--------------|------------|---|
| | | Latitude | Longitude | |
| SOU 29 – Giram | Giram Palm Oil Mill | 4° 35' N | 118° 12' E | Kilang Kelapa Sawit Giram, 91207 Kunak, Sabah |
| | Giram Estate | 4° 35' N | 118° 12' E | Giram Estate, 91207 Kunak, Sabah |
| | Mostyn Estate | 4° 39' N | 118° 07' E | Mostyn Estate, 91207 Kunak, Sabah |

MAP : See Attachment 1

AUDIT DATE : 8 - 10 May 2019

DURATION : 12 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 July 2015 - 12 July 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 : MOHD SAFIRUS HAILANI

Signature :

Signature :

Date :

13/08/2019

Date :

19/08/2019

PUBLIC SUMMARY REPORT

SUMMARY OF AUDITS

| Stage 2 audit / Recertification audit | | | | |
|--|--|--|-------------------------------|---------------------|
| On-site audit date | : 9 - 11 December 2014 | No. of auditor days | : 9 | |
| Audit team | : Khairul Najwan Ahmad Jahari (LA), Valence Shem, Mohamed Hidhir Zainal Abidin | | | |
| No. of major NCR | : 6 | Indicator: 2.1.1, 2.3.1, 2.3.2, 4.7.1, 4.8.1 & 6.5.1 | Closing date | : 8/4/2015 |
| No. of minor NCR | : 5 | Indicator : 2.1.4, 2.2.3.2, 2.3.3, 6.4.3 & 6.5.2 | | |
| Indicate the stakeholders interviewed during the on-site audit | Employees | Settlers | Villagers / Local communities | Suppliers |
| | √ | | √ | √ |
| | Contract workers | NGOs | Govt. agency | Independent growers |
| | | | | |
| | Indigenous people | Contractor | Others (Please specify) | |
| | √ | | | |
| Supply base sampled | : Mostyn and Giram Estate | | | |

| Annual Surveillance Audit 1 | | | | |
|---|---|---------------------------|-------------------------------|---------------------|
| On-site audit date | : 12 – 14 April 2016 | No. of auditor days | : 9 | |
| Audit team | : Mahzan Bin Munap (LA), Khairul Najwan Bin Ahmad Jahari, Selvasingam T Kandiah, Ruzita Binti Abd Ghani | | | |
| No. of major NCR | : 1 | Indicator: 4.7.3 | Closing date | : 13/06/2016 |
| No. of minor NCR | : 2 | Indicator : 4.1.2 & 6.1.4 | | |
| Indicate by ticking the stakeholders interviewed during the on-site audit | Employees | Settlers | Villagers / Local communities | Suppliers |
| | √ | | √ | √ |
| | Contract workers | NGOs | Govt. agency | Independent growers |
| | | | | |
| | Indigenous people | Contractor | Others (Please specify) | |
| | √ | | | |
| Supply base sampled | : Mostyn and Giram Estates | | | |
| Changes since the last audit | : No changes | | | |

| Annual Surveillance Audit 2 | | | | |
|---|---|---------------------|-------------------------------|---------------------|
| On-site audit date | : 23 – 25 May 2017 | No. of auditor days | : 9 | |
| Audit team | : Mohd Razman Salim, Mohd Zulfakar Kamaruzaman, & Rozaimie Ab. Rahman | | | |
| No. of major NCR | : 1 | Indicator: 2.1.1 | Closing date | : 20/07/2017 |
| No. of minor NCR | : 1 | Indicator : 2.2.2 | | |
| Indicate by ticking the stakeholders interviewed during the on-site audit | Employees | Settlers | Villagers / Local communities | Suppliers |
| | √ | | √ | √ |
| | Contract workers | NGOs | Govt. agency | Independent growers |
| | | | | |
| | Indigenous people | Contractor | Others (Please specify) | |
| | √ | | | |
| Supply base sampled | : Giram and Mostyn Estate | | | |
| Changes since the last audit | : No changes | | | |

PUBLIC SUMMARY REPORT

| Annual Surveillance Audit 3 | | | |
|---|---|---------------------|-------------------------------|
| On-site audit date | : 14 to 16 & 18 May 2018 | No. of auditor days | : 9 |
| Audit team | : Selvasingam T. Kandiah, Rozaimée Ab Rahman, Mohd Zulfakar Kamaruzaman and Mohd Norddin Abdul Jalil | | |
| No. of major NCR | : 1 | Indicator : 1.1.2 | Closing date : 13/08/2018 |
| No. of minor NCR | : - | Indicator : - | |
| Indicate by ticking the stakeholders interviewed during the on-site audit | Employees | Settlers | Villagers / Local communities |
| | √ | | √ |
| | Contract workers | NGOs | Govt. agency |
| | | | |
| | Indigenous people | Contractor | Others (Please specify) |
| | NA | √ | |
| Supply base sampled | : Giram and Mostyn Estate | | |
| Changes since the last audit | : No changes | | |
| Justification of audit planning | : Total allocation of auditor days for Giram CU were: 9 days Mill = 3 days (2 day for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Mostyn Estate = 3 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title. Giram Estate = 3 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title. | | |
| Report approved by | : Radziah Mohd. Daud | Approval date | : 27/08/2018 |

| Annual Surveillance Audit 4 | | | |
|---|--|---------------------------------|-------------------------------|
| On-site audit date | : 8-10 May 2019 | No. of auditor days | : 12 Auditor Days |
| Audit team | : Mohd Zulfakar Kamaruzaman (LA), Rozaimée Ab Rahman, Rahayu Zulkifli, Mohd Norddin Abdul Jalil | | |
| No. of major NCR | : 1 | Indicator: D 4.2 (Supply Chain) | Closing date : 30/07/2019 |
| No. of minor NCR | : 1 | Indicator : 4.1.3 | |
| 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 | : Giram and Mostyn Estate | | |
| Changes since the last audit | : No changes | | |
| Justification of audit planning | : Total allocation of auditor days for Giram CU were: 12 days Mill = 4 days (3 day for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Mostyn Estate = 4 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title. Giram Estate = 4 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title. | | |
| Report approved by | : Radziah Mohd Daud | Approval date | : 13/08/2019 |

PUBLIC SUMMARY REPORT

SUMMARY OF INFORMATION

TABLE 1

| | STAGE 2 / RA | ASA 1 | ASA 2 | ASA 3 | ASA 4 |
|---|---|---------------------|-----------------------|-----------------------|-----------------------|
| Projection Period | Dec 2015 – Nov 2016 | Jan 2016 – Dec 2016 | May 2017 – April 2018 | May 2018 – April 2019 | May 2019 – April 2020 |
| Certified FFB Processed (MT) | 203,571.32 | 148,484.22 | 158,966.23 | 136,068.02 | 154,000.00 |
| Production of Certified CPO (MT) | 43,272.58 | 36,753.22 | 36,867.70 | 30,384.06 | 35,420.00 |
| Production of Certified PK (MT) | 11,226.94 | 7,886.33 | 7,748.24 | 6,803.42 | 8,470.00 |
| Certified Areas (Ha) | 8,245.01 | 8,245.01 | 8,245.01 | *8,345.02 | *8,345.02 |
| Planted Areas (Ha) | 7,602.13 | 7,666.85 | 7,666.85 | 7,519.92 | 7,519.92 |
| Production Areas (Ha) | 6,264.60 | 6,735.07 | 6,767.81 | 6,515.59 | 7,098.95 |
| HCV Areas (Ha) | 89.39 | 89.39 | 89.39 | 89.39 | 89.39 |
| REMARKS | *The Certified Area has been revised in 2018. | | | | |

TABLE 2

| | PO | PK |
|--|------------|-----------|
| Last years certified volume (MT) | *34,348.15 | *7,770.64 |
| Last years actual certified sold (MT) | 0.00 | 5,086.06 |
| Last years actual sold under other schemes (MT) | 0.00 | 0 |
| Last years sold conventional (MT) | 31,236.24 | 1,267.91 |
| New year certified volume (MT) | 35,420.00 | 8,470.00 |

*New volume extension approved by RSPO on 25/06/2019.

| Table of contents | Page |
|--|-------------|
| 1.0 AUDIT PROCESS | 6 |
| 1.1 Certification body | 6 |
| 1.2 Qualification of audit team | 6 |
| 1.3 Audit methodology | 6 |
| 1.4 Stakeholder consultation | 6 |
| 1.5 Audit plan | 6 |
| 1.6 Date of next audit | 6 |
| 2.0 SCOPE OF CERTIFICATION AUDIT | 7 |
| 2.1 Description of the certification unit | 7 |
| 2.2 Description of the Supply Base (including planting profile) | 7 |
| 2.3 Organization Information / Contact Person(s) | 10 |
| 3.0 AUDIT FINDINGS | 11 |
| 3.1 Changes to certified products in accordance to the production of the previous year | 11 |
| 3.2 Time bound plans including changes and reasons for the changes see below | 11 |
| Overall comment in terms of acceptance or non-acceptance on the changes in the time-bound plan (including details of non-adherence or the conditions justifying a time-bound plan have changed) | 11 |
| 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. | 11 |
| Any new acquisition which has replaced primary forests or HCV areas | 11 |
| 3.3 Other changes (e.g. organizational structure, new contact person, addresses, etc.) | 11 |
| 3.4 Status of previous non-conformities * (refer to Attachment 6) | 11 |
| 3.5 Complaint received from stakeholder (if any) | 11 |
| 4.0 DETAILS OF NON-CONFORMITY REPORT | 12 |
| 4.1 For P&C (Details checklist refer to Attachment 3) | 12 |
| 4.2 For SC (Details checklist refer to Attachment 5) | 12 |
| 5.0 AUDIT CONCLUSION | 12 |
| 6.0 RECOMMENDATION | 12 |
| List of Attachment | |
| Attachment 1 : Map of Giram CU | 13 |
| Attachment 2 : RSPO Surveillance Audit Plan | 14 |
| Attachment 3 : RSPO P&C Audit Checklist And Findings | 19 |
| Attachment 4 : Details of Non-conformities and Corrective Actions Taken | 53 |
| Attachment 5 : RSPO Supply Chain at the palm oil mill – Identity Preserved Model – Module D | 54 |
| Attachment 6 : Status of Non-conformities Previously Identified | 66 |
| Attachment 7 : Time-bound Plan | 67 |

PUBLIC SUMMARY REPORT

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, Environmental, 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. He has been trained as a RSPO Lead Auditor |
| Rahayu Zulkifli | Auditor, Social | Holds a Degree in LLB (Hon), she was a practicing lawyer before joining WWF-Malaysia and RSPO as a Dispute Settlement Facility Manager. She is now working as a freelance RSPO auditor. |
| Rozaimiee Ab Rahman | Auditor / Environmental TBP & OHS | 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 Nordin 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} . However, for Giram, 100% sampling carried out where the 2 supply bases covered i.e. Giram Estate and Mostyn 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.

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Giram Certification Unit (Giram CU) is one of the Strategic Operating Unit (SOU) of Sime Darby Plantation Sdn. Bhd. (SDPSB). Located in Kunak, Sabah, East Malaysia, the CU is also known as SOU 29. The CU was certified to the RSPO MYNI:2014 P&C by SIRIM QAS International Sdn Bhd on 13 July 2015.

The Giram CU comprises of the Giram Palm Oil Mill (Giram POM) and two supply base i.e. the Giram Estate and Mostyn Estate. All the estates are owned by SDPSB. The Giram POM has a mill capacity of 60 mt/hour. All the estates have been fully developed before 2005, hence Principle 7 of the RSPO P&C is therefore not applicable.

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

The FFB is sourced from company owned estates that were 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
(May 2018 to April 2019)

| Estates | FFB Production | |
|--------------------|----------------|----------------|
| | Tonnes | Percentage (%) |
| Giram Estate | 66,373.77 | 47.40 |
| Mostyn Estate | 73,515.45 | 52.50 |
| JeletaBumi Estate* | 39.00 | 0.03 |
| Sungang Estate* | 101.73 | 0.07 |
| Total | 140,029.95 | 100 |

*Diversion from RSPO Certified SOU Binuang

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

| CU own estates | FFB Contribution | |
|----------------|------------------|----------------|
| | Tonnes | Percentage (%) |
| Giram Estate | 83,000.00 | 53.90 |
| Mostyn Estate | 71,000.00 | 46.10 |
| Total | 154,000.00 | 100 |

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

| | Total (MT) |
|--|------------|
| FFB Received | 140,029.95 |
| FFB Processed | 140,015.60 |
| CPO Production | 31,314.25 |
| PK Production | 6,918.51 |
| CPO delivered as RSPO certified | 0.00 |
| CPO delivered under other schemes | 0.00 |
| CPO delivered as non-RSPO certified | 31,236.24 |
| PK delivered as RSPO certified | 5,086.06 |
| PK delivered under other schemes | 0.00 |
| PK delivered as non-RSPO certified | 1,267.91 |
| Credits traded through Books and Claim | 0.00 |

PUBLIC SUMMARY REPORT

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

| | Total (MT) |
|-------------------------------------|-------------------|
| FFB Received | 154,000.00 |
| FFB Processed | 154,000.00 |
| CPO Production | 35,420.00 |
| PK Production | 8,470.00 |
| CPO delivered as Identity Preserved | 35,420.00 |
| CPO delivered as non-RSPO certified | 0.00 |
| CPO delivered under other schemes | 0.00 |
| PK delivered as Identity Preserved | 8,470.00 |
| PK delivered as non-RSPO certified | 0.00 |
| PK delivered under other schemes | 0.00 |

Table 5 Planted and certified area of the CU

| Estate | Planted (ha) | Certified (ha) | HCV (ha) |
|---------------|--------------|----------------|----------|
| Giram Estate | 3924.07 | 4166.98 | 49.40 |
| Mostyn Estate | 3595.85 | 4178.04 | 39.99 |
| Total | 7519.92 | 8345.02 | 89.39 |

Table 6: Planting profile for Giram Estate

| Year of planting | Planting cycle (Generation) | Mature / Immature | Planted area (ha) | Percentage of planted area (%) |
|------------------|-----------------------------|-------------------|-------------------|--------------------------------|
| MAIN DIV. | | | | |
| 1993T2 | 1 | Mature | 116.86 | 2.98 |
| 1995B1 | 1 | Mature | 116.86 | 2.98 |
| 1995B2 | 1 | Mature | 65.71 | 1.67 |
| 1995B2A | 1 | Mature | 103.61 | 2.64 |
| 1995B3 | 1 | Mature | 126.05 | 3.21 |
| 1995B3A | 1 | Mature | 88.16 | 2.25 |
| 1995T1 | 1 | Mature | 120.70 | 3.08 |
| 1995T1A | 1 | Mature | 90.29 | 2.30 |
| 1995T2 | 1 | Mature | 97.30 | 2.48 |
| 1995T2A | 1 | Mature | 90.67 | 2.31 |
| 1996B | 1 | Mature | 73.61 | 1.88 |
| 1996B1 | 1 | Mature | 69.51 | 1.77 |
| 1996K | 1 | Mature | 122.69 | 3.13 |
| 1996K1 | 1 | Mature | 107.92 | 2.75 |
| 1996T | 1 | Mature | 159.34 | 4.06 |
| 1996T1 | 1 | Mature | 121.57 | 3.10 |
| 1999B | 1 | Mature | 145.84 | 3.72 |
| 1999T | 1 | Mature | 100.56 | 2.56 |
| 1999T1 | 1 | Mature | 64.78 | 1.65 |
| 2016A | 2 | Mature | 65.98 | 1.68 |
| 2016B | 2 | Mature | 94.03 | 2.40 |
| 2018A | 2 | Immature | 49.29 | 1.25 |
| 2018B | 2 | Immature | 69.12 | 1.76 |
| 2018C | 2 | Immature | 78.60 | 2.00 |
| 2018D | 2 | Immature | 86.93 | 2.22 |

PUBLIC SUMMARY REPORT

| Year of planting | Planting cycle (Generation) | Mature / Immature | Planted area (ha) | Percentage of planted area (%) |
|------------------|-----------------------------|-------------------|-------------------|--------------------------------|
| 2009A | 2 | Mature | 106.81 | 2.72 |
| 2009B | 2 | Mature | 67.40 | 1.72 |
| 2011A | 2 | Mature | 75.64 | 1.93 |
| 2011B | 2 | Mature | 101.44 | 2.59 |
| 2011C | 2 | Mature | 94.41 | 2.41 |
| 2011D | 2 | Mature | 68.19 | 1.74 |
| 2012A | 2 | Mature | 87.65 | 2.23 |
| 2012B | 2 | Mature | 98.62 | 2.51 |
| 2013A | 2 | Mature | 100.09 | 2.55 |
| 2013B | 2 | Mature | 74.83 | 1.91 |
| 2014A | 2 | Mature | 85.31 | 2.17 |
| 2015A | 2 | Mature | 79.67 | 2.03 |
| 2015B | 2 | Mature | 88.62 | 2.26 |

ULU Balung DIV.

| | | | | |
|------------------------|---|--------|----------|--------|
| 1995K | 1 | Mature | 38.11 | 0.97 |
| 1995L | 1 | Mature | 39.81 | 1.01 |
| 1995M | 1 | Mature | 30.11 | 0.77 |
| 1995N | 1 | Mature | 44.50 | 1.13 |
| 1995P | 1 | Mature | 36.35 | 0.93 |
| 1995Q | 1 | Mature | 31.15 | 0.79 |
| 1995R | 1 | Mature | 36.48 | 0.93 |
| 1995S | 1 | Mature | 39.13 | 1.00 |
| 1995T | 1 | Mature | 38.52 | 0.98 |
| 1995U | 1 | Mature | 35.25 | 0.90 |
| Total for GIRAM Estate | | | 3,924.07 | 100.00 |

Table 7: Planting profile for Mostyn Estate

| Year of Planting | Planting cycle (Generation) | Mature / Immature | Planted area (ha) | Percentage of planted area (%) |
|------------------|------------------------------|-------------------|--------------------|--------------------------------|
| 03M | 3 | Mature | 63.73 | 1.77 |
| 03M2 | 3 | Mature | 54.71 | 1.52 |
| 05M | 3 | Mature | 70.72 | 1.97 |
| P02F | 3 | Mature | 55.33 | 1.54 |
| P02F1 | 3 | Mature | 58.23 | 1.62 |
| 2010B | 3 | Mature | 72.17 | 2.01 |
| 2010C | 3 | Mature | 36.8 | 1.02 |
| 2011B | 3 | Mature | 89.99 | 2.50 |
| 2011C | 3 | Mature | 36.79 | 1.02 |
| 2015B | 3 | Mature | 43.78 | 1.22 |
| 2016A | 3 | Mature | 61.54 | 1.71 |
| 2016B | 3 | Mature | 81.24 | 2.26 |
| 92M | 2 | Mature | 78.93 | 2.20 |
| 93M | 2 | Mature | 55.07 | 1.53 |
| 96T1A | 2 | Mature | 64.24 | 1.79 |
| 96T1B | 2 | Mature | 95.33 | 2.65 |
| 07M | 3 | Mature | 13.83 | 0.38 |
| 2011A | 3 | Mature | 78.91 | 2.19 |
| 2013B | 3 | Mature | 95.18 | 2.65 |
| 94M2 | 2 | Mature | 70.14 | 1.95 |
| 95M | 2 | Mature | 14.99 | 0.42 |
| 96M | 2 | Mature | 78.15 | 2.17 |
| 96M1 | 2 | Mature | 93.1 | 2.59 |
| 96M2 | 2 | Mature | 86.01 | 2.39 |
| 97M3 | 2 | Mature | 57.38 | 1.60 |
| 97M1 | 2 | Mature | 67.92 | 1.89 |
| 97M2 | 2 | Mature | 76.77 | 2.13 |
| 2009A | 3 | Mature | 52.01 | 1.45 |
| 2009B | 3 | Mature | 102.27 | 2.84 |
| 2013A | 3 | Mature | 101.89 | 2.83 |
| 2014A | 3 | Mature | 66.34 | 1.84 |

PUBLIC SUMMARY REPORT

| | | | | |
|--------|---|----------|----------|------|
| 2014B | 3 | Mature | 32.26 | 0.90 |
| 2014C | 3 | Mature | 56.12 | 1.56 |
| 2015A | 3 | Mature | 68.5 | 1.90 |
| 2017A | 3 | Immature | 101.0 | 2.81 |
| 2017B | 3 | Immature | 36.03 | 1.00 |
| 80M2 | 2 | Mature | 46.6 | 1.30 |
| 03M1 | 3 | Mature | 38.87 | 1.08 |
| 2009D | 3 | Mature | 42.2 | 1.17 |
| 2010A | 3 | Mature | 59.51 | 1.65 |
| 2010A1 | 3 | Mature | 45.85 | 1.28 |
| 57M | 1 | Mature | 1.82 | 0.05 |
| 97M3A | 2 | Mature | 65.93 | 1.83 |
| 97M3B | 2 | Mature | 67.21 | 1.87 |
| 97M3C | 2 | Mature | 76.49 | 2.13 |
| 97M4 | 2 | Mature | 79.92 | 2.22 |
| 97M4A | 2 | Mature | 55.13 | 1.53 |
| 97M4B | 2 | Mature | 70.29 | 1.95 |
| 97M5 | 2 | Mature | 63.65 | 1.77 |
| 97M5A | 2 | Mature | 91.45 | 2.54 |
| 97M5B | 2 | Mature | 48.27 | 1.34 |
| 97M6 | 2 | Mature | 98.62 | 2.74 |
| 97M6A | 2 | Mature | 93.21 | 2.59 |
| P02R | 3 | Mature | 65.17 | 1.81 |
| 90M | 2 | Mature | 1.00 | 0.03 |
| 91M1 | 2 | Mature | 1.00 | 0.03 |
| P02RA | 3 | Mature | 58.94 | 1.64 |
| P02RB | 3 | Mature | 57.32 | 1.59 |
| Total | | | 3,595.85 | 100 |

2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below: **SOU Giram**

| | | |
|-----------|---|--|
| Name | : | Mohd Safirus bin Hailani |
| Position | : | Sr. Manager |
| Address | : | Ladang Giram, PO Box 19, 9120, Kunak, Sabah |
| Phone no. | : | 019-380 8670 |
| Fax no. | : | 089-855291 |
| Email | : | ldg.giram@simedarbyplantation.com |

PUBLIC SUMMARY REPORT

3.0 AUDIT FINDINGS

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

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

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

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

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

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? Yes No

If no, please state reasons Not applicable. There were no associated smallholders supplying FFB to the CU.

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

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

Yes, previous SOU Chairman Mr Saifullizan bin Kamaruddin was replaced by Mr Mohd Safirus bin Hailani.

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 no complaints received from stakeholders.

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 : 1 RAR 01 2019

Total no. of major NCR(s)
(details refer to Attachment 4) List : NIL

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

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

Total no. of major NCR(s)
(details refer to Attachment 5) List : 1 MZK 02 2019

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)

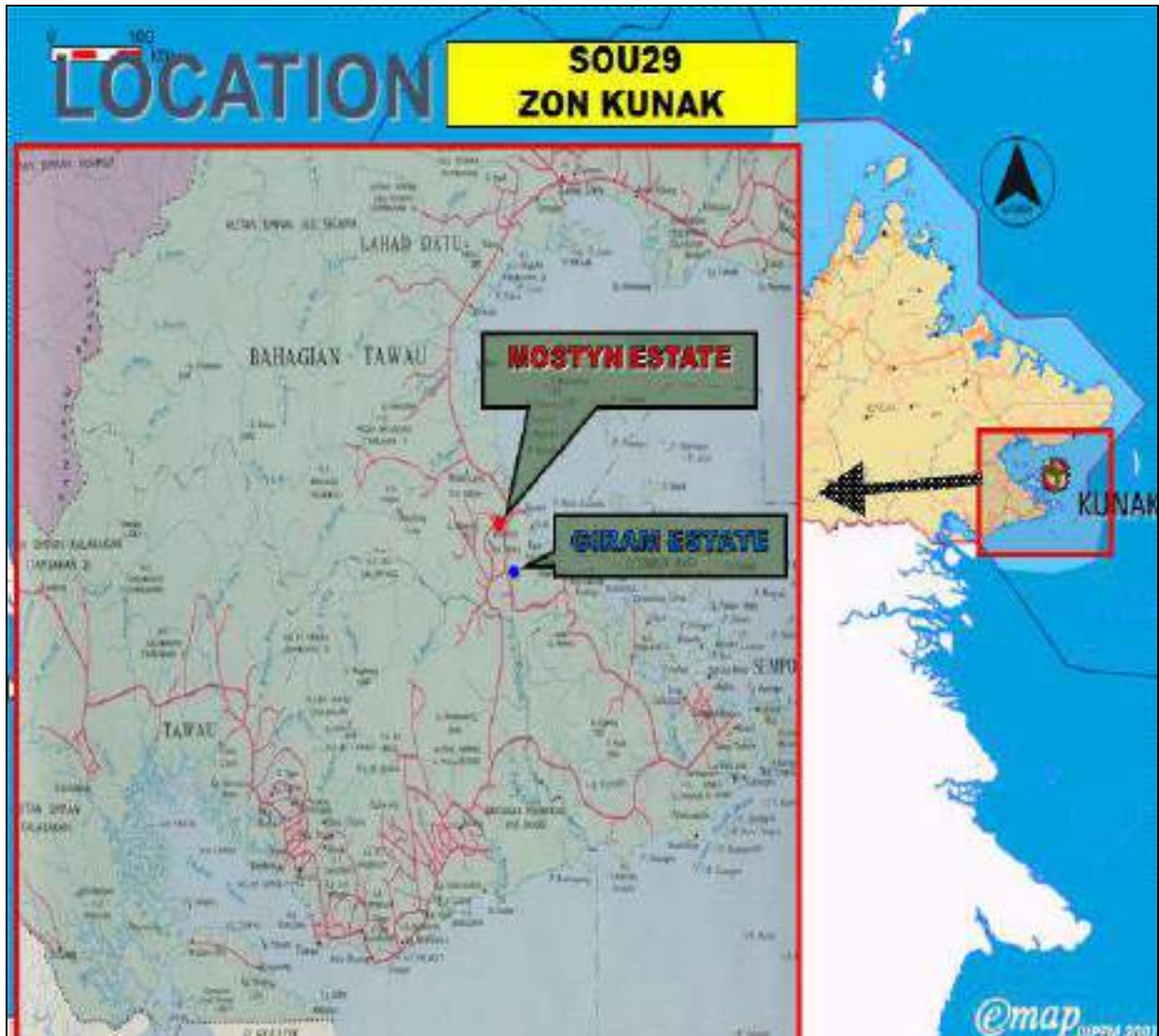


(Signature)

30/07/2019

(Date)

Map of SOU 29 – Giram CU



SURVEILLANCE AUDIT PLAN

1. Objectives

The objectives of the audit are as follows:

- To evaluate **SOU Giram** continued conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI) and RSPO Supply Chain Requirements
- To verify the effective implementation of corrective actions arising from the findings of last assessment.
- To make appropriate recommendations based on the assessment findings.

2. **Date of assessment** : 8-10 May 2019

3. **Site of assessment** : SOU Giram

- Giram Palm Oil Mill
- Giram Estate
- Mostyn Estate

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

5. Reference Standard :

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

6. Assessment Team

Assessor: Rahayu Zulkifli (Social, HCV)
Rozaimie Ab Rahman (Environment, Safety, TBP)
Mohd Zulfakar Kamaruzaman (HCV, Environment, Supply Chain)
Mohd Norddin Abdul Jalil (Good Agriculture Practices)

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

7. Audit Method

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

RSPO PUBLIC SUMMARY REPORT

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. Recurring major non- conformities on the same indicator in successive surveillance audits shall result in the immediate suspension of the RSPO P & C certification shall be recommended.

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

12. Facilities Required

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

13. **Assessment Programme Details** : As below

RSPO PUBLIC SUMMARY REPORT

| Date / Time | Coverage of assessment / Activity / Site | Zulfakar | Rahayu | Rozaimee | Norddin |
|--------------------------------------|--|----------|--------|----------|---------|
| Day 1: 8 May 2019 (Wednesday) | | | | | |
| 8.30am – 9.15am | Opening Meeting – Venue: Giram POM <ul style="list-style-type: none"> • Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes • Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases , Time bound plan, actions taken to address previous audit findings. | | | | |
| 9.15am – 12.30pm | Site observation to Giram POM RSPO Supply Chain 2014 <ul style="list-style-type: none"> • RSPO Supply chain standard implementation including model requirements 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 | | | | |
| 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 |
| Day 2: 9 May 2019 (Thursday) | | | | | |
| 8.30am – 12.30pm | Site observation to Giram Estate <ul style="list-style-type: none"> • P1, P2, P3, P4, P5, P6, P7, P8 | | | | |

RSPO PUBLIC SUMMARY REPORT

| | | | | | |
|------------------------------------|---|-----------------|--------------|-----------------|----------------|
| | <ul style="list-style-type: none"> • 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, 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 | Selva | Rozaimee | Norddin |
| Day 3: 10 May 2019 (Friday) | | | | | |
| | <p>Site observation to Mostyn 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, contractors, supplier, etc. | | | | |

RSPO PUBLIC SUMMARY REPORT

| | | | | | |
|-----------------|--|--|--|--|--|
| | <ul style="list-style-type: none"> • 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 | | | | |
| 2.30pm – 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 Giram POM • Presentation of audit findings, positive comment, • Question & answer | | | | |

RSPO PUBLIC SUMMARY REPORT

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 Giram continued to 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. It continued to implement the procedure for responding to any communication as outlined in their Estate/Mill Quality Management System documents. SDPSB continued to use their website for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances were readily made available through SDPSB website at http://plantation.simedarby.com Based on sampling taken, there was evidence that Giram CU provides adequate information on social issues upon request to stakeholders. |
| | 1.1.2 Records of requests for information and responses shall be maintained. Major Compliance | Yes | Giram CU records were being maintained of requests for information and the responses given. Internal communication was kept in the 'Buku aduan/Buku Laporan Kerosakan rumah dan lain-lain' and it was mainly for request for repairs of employee houses. For, external communication records of minutes of meetings held were maintained. Records such as letter from Government department such as DOSH, DOE and Labour Department and their responses were maintained in the communication file. At time of visit, there were no request for any information from the public. |
| C 1.2 Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. | 1.2.1 Land titles/user rights; | Yes | Copies of land titles / user rights were sighted available at the audited sites. Refer to Indicator 2.2.1. |
| | Occupational health and safety plans; | Yes | Both estates and the mill have established the Safety and Health plan. The SDPSB OHS Policy (available in both Bahasa and English) was available at all the operating units. Information relating to safety and health plan was available through SDPSB website at http://plantation.simedarby.com . Cross refer Criterion 4.7 |
| | Plans and impact assessments relating to environmental and social impacts: | Yes | Management documents related to environmental plans and impact assessments were made available at all audited operating units. |
| | HCV documentation summary; | Yes | HCV documentation summary was available at Giram CU. Cross refer to 5.2 |
| | Pollution prevention and reduction plans; | Yes | Pollution prevention and reduction plans continued made available at all assessed operating units. |
| | Details of complaints and grievances; | Yes | Details of complaints and grievances were being recorded and kept in records and files which contain complaints on housing defects from the workers. No complaints from external stakeholders was sighted. |
| | Negotiation procedures; | | Negotiation procedures were made available during the audit. There was no evidence of |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | | Comply Yes/No | Findings |
|---|------------|---|---------------|--|
| | | | Yes | any claim against Giram CU by any party. |
| | | Continual improvement plans; | Yes | Sime Darby Plantation Sdn. Bhd. 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 have been reported in indicator 8.1. The continuous improvement plans related to environment was established and update accordingly. Continual improvement plans at all operating units. |
| | | Public summary of certification assessment report; | Yes | Public summary for RSPO certification assessment report can be assessed SIRIM QAS website. |
| | | Human Rights Policy (Criterion 6.13). | Yes | The Social Humanity Management Policy was updated in Jan 2015. The policy was displayed at the notice boards at the mill and the estates' offices. |
| 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 | Giram CU was bound by, and observes the Sime Darby Group's "Code of Business Conduct (COBC)". This COBC was also available on its website http://www.simedarby.com/about-us/governance/ and communicated to all employees. The COBC states the Company's commitment towards fair conduct of business, prohibition of all forms of corruption, bribery and fraudulent use of funds and resources. These policies have been communicated to all level of the workforce through display on notice boards at the mill and estates, memos, morning briefings and trainings. |

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 Giram 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 Giram 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 |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | | Comply Yes/No | Findings |
|---|------------|--|---------------|---|
| | | | | 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 information on legal requirements shall be maintained. Minor Compliance | Yes | Mostyn Estate, Giram Estate and Giram Palm Oil Mill have its own updated Legal and Other Requirements Register (LORR). The LORR sighted during the audit have been adequately updated to include changes to the minimum wages as per the revised Minimum Wages Order 2018 which came into force in Jan 2019. It was observed during the audit that the Company has implemented the system consistently when cross-references were made to the workers' payslips. |
| | 2.1.3 | A mechanism for ensuring compliance shall be implemented. Minor Compliance | Yes | The CU had a documented system for identifying, updating changes to legal requirements and to monitor the status of legal compliance in their EQMS & MQMS (Estate & Mill Quality Management System) included under the Standard Operation Manual. The mechanism for ensuring compliance was ensured by Sustainability unit, GSQM Department & RSQM through the RSPO & MSPO Internal Audit. |
| | 2.1.4 | A system for tracking any changes in the law shall be implemented. Minor Compliance | Yes | The tracking for changes in the law has been carried out by the PSQM Department at SDPSB's headquarters at Ara Damansara, Subang. Any change in the law was disseminated to all CUs which then updates its legal register from time to time. |
| 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 legal ownership and the maps to indicate the boundary stone were sighted at Giram Estate and Mostyn Estate. The Land Title for both Estate has been verified, The Land Title were originated from 11 Smallholder and Sell to Company Name Harrison's Malaysian Plantations Sdn Bhd in year 1984-1992. Auditor has verified the record of Transfer from smallholder to Harrison. Harrison's Malaysian Plantations Sdn Bhd has sell the land to Golden Hope plantations in 1991 and after that merge with Sime Darby in year of 2008. Both estates still in progress to get the ownership of these land titles as verified through official letter from the Lands and Surveys Department of Sabah in June 2015. |
| | 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 | Giram Estate and Mostyn Estate has visibly maintained its boundary pegs adjacent with Ulu Kalumpang Forest Reserves, Borneo Samudera Estate, Intan Plantation Sdn Bhd and Kg. Skim Cocos. Auditor also verify boundary area between Sipit Division (Giram Estate) and KLK Plantation, the boundary pegs were already visible and maintained. |
| | 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 | Yes | During this audit, auditor attempted to consult the complainants from Kg. Kadazan on the issue of electric poles and cables inside the village. Unfortunately, the complainant cannot be reached. However, based on last year report, the Mostyn Estate has conducted proper meeting with the complainant in Jan 2015. Minutes of meeting between them was sighted. Clear participatory mapping had been conducted to construct map that show the extent of his right. A certified copy of the surveyed map that showed the extent of his area was handed to the complainant by the Mostyn estate representative. Mostyn estate representative also informed |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | | Comply Yes/No | Findings |
|---|-------------------|---|----------------------|---|
| | | been accepted with FPIC. Minor Compliance | | him on the action to be taken by the estate (that was, to remove electric poles and cables and construction new road inside estate's land). |
| | 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 | Evidence of ownership was available and were sighted. It was also noted from records sighted, as well as through interviews with stakeholders, that there were no dispute on land rights in the area, except with the complainant as mentioned above. Action has been taken appropriately as explained in indicator 2.2.3. |
| | 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 (incl. neighbouring communities and relevant authorities where applicable). Minor Compliance | Yes | Map to appropriate scale showing extent of claims under dispute with the complainant at Mostyn Estate was clearly defined during the meeting in Jan 2015. This was confirmed during the consultation with family member of the complainant as he was not available. |
| | 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 | Site visit to SOU Giram found no evidence that oil palm operations have instigated violence. Instead, peace and order was being maintained in the SOU Giram current and planned operations. This was confirmed during the consultation with the neighbouring estates. |
| C 2.3 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior, and informed consent. | 2.3.1 | Maps of an appropriate scale showing the extent of recognised legal, customary or user rights shall be developed through participatory mapping involving affected parties (incl. neighbouring comm. where applicabl & relevant authorities). Major Compliance | Yes | Evidence of ownership was sighted. It was noted from records viewed, as well as through interviews with stakeholders, that there were no disputes on land rights in the area except with the complainant as highlighted under Indicator 2.2.3. There was no any other disputes as confirmed with the neighbouring estates. |
| | 2.3.2 | Copies of negotiated agreements detailing the process of FPIC shall be available and shall include: | Yes | Copy of negotiated agreements detailing process of consent with the complainant at Mostyn Estate was made available. During Surveillance Audit in 2018, auditor has verified that the complainant had already released the claim as Mostyn Estate has already removed the electric poles and cable. The Letter of confirmation dated in Jan 2016 was verified by the auditor. |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | | Comply Yes/No | Findings |
|--------|------------|---|---------------|--|
| | a) | Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision-making; | | |
| | b) | Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; | | |
| | c) | Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. Minor Compliance | | |
| 2.3.3 | | All relevant info shall be available in appropriate form & languages, incl. assessments of impacts, proposed benefit sharing & legal arrangements. Minor Compliance | Yes | Copy of the negotiated agreements was made available with appropriate forms and languages. |
| 2.3.4 | | Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, incl. legal counsel. Major Compliance | Yes | There was no issue on legal, customary or user rights of other users without their free, prior and informed consent. This was confirmed during the consultation with the neighbouring estates. |

RSPO PUBLIC SUMMARY REPORT

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 | Giram SOU continued to achieve long term economic and financial viability through documented management plan projected to year 2021. A business plan including crop forecast, capital expenditure, operational expenditure, general charges, profit and loss covering the period of 2019 to 2021 had been prepared for both estates and made available to the audit team. |
| | 3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, shall be available. Minor Compliance | Yes | The replanting programme for year 2019 to 2023 were sighted for both estates. The programme was reviewed once a year and incorporated into their annual financial budget. |

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

| Clause | Indicators | Comply Yes/No | Findings |
|---|---|---------------|---|
| C 4.1 Operating procedures are appropriately documented, consistently implemented and monitored. | 4.1.1 Standard Operating Procedures (SOPs) for estates and mills shall be documented. Major Compliance | Yes | Giram SOU continued to use the Agriculture Reference Manual, Estate Quality Management System, Safety Standard Operating Procedures, Sustainable Plantation Management System Manual, "Guidelines On River Management" Manual, ESH Management System Manual, Occupational Safety and Health Manual, Pictorial Safety Standards, and Security Guidelines. The ARM includes the operation in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. For both estates, on top of the EQMS, contents of the Agriculture Reference Manual were disseminated to the workers through morning roll call and trainings. |
| | 4.1.2 A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance | Yes | The mechanisms to check the implementation of procedures were carried out through RSPO internal audit report for Mostyn and Giram Estates respectively by PSQM team, safety and health meeting and routine workplace inspection by assistant manager, staff and hospital assistant. In addition, Performance Monitoring Unit under Upstream Department from Headquarters had conducted quarterly monitoring on quality of implementation procedure such as loose fruit collection, harvested bunch left and unharvested bunches, safe working condition and mechanization. |
| | 4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance | No | Records of monitoring and actions taken by Giram SOU continued to be maintained. This was to ensure that the established procedures were consistently implemented. Among the records sighted at the estates included Work Program Sheets, Field cost books, Bin cards, Harvesting Intervals, Monthly Progress & Report Account, rainfall data and Daily muster chits. Harvesting standards were monitored using SDSB's Plantation Micro Macro Program (PMMP). However it was found that : |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | Comply Yes/No | Findings |
|--|------------|---------------|--|
| | | | <ul style="list-style-type: none"> It was found that the harvesting mandore in field 14A of Langgas Division of Mostyn Estate and the maintenance mandore in field 18 G of Ulu Balung Division of Giram Estate do not have any 1st Aid Kit boxes with them when supervising the workers. At Mostyn Estate (Creche) fire extinguisher was already expired. <p>Therefore a minor non compliance RAR 01 2019 was raised against this indicator.</p> |
| | 4.1.4 | Yes | The scope for Giram POM SC is Identity Preserved, hence, this indicator was not applicable. |
| C 4.2 Practices maintain soil fertility at or, where possible, improve oil fertility to a level that ensures optimal & sustained yield. | 4.2.1 | Yes | Giram 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. Annual fertilizer recommendations were made based on annual foliar sampling done in Sept 2018 and Dec 2018 at Mostyn Estate and Giram Estate respectively. As for soil samplings, it was carried out on a 5 year cycle basis, latest done in 2018 by Sime Darby Research Sdn. Bhd. |
| | 4.2.2 | Yes | Records of programs and applications of fertilisers were made available to auditors. |
| | 4.2.3 | Yes | Periodic tissue and soil sampling were carried out in Giram 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. |
| | 4.2.4 | Yes | Giram SOU had a nutrient recycling strategy where palm fronds were properly U-shaped stacked in the interrow to decompose and EFB application. |
| C 4.3 Practices minimise and control erosion and degradation of soils. | 4.3.1 | Yes | During the field visit and the soil map provided it was observed that no fragile or marginal soils found in Giram SOU. |
| | 4.3.2 | Yes | Giram SOU had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. The plantings on slopes between 9-25° was guided by its Slope & River Protection Policy, updated on Jan 2015, which was posted on the Estates notice board. |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | | Comply Yes/No | Findings |
|---|-------------------|---|----------------------|---|
| | 4.3.3 | A road maintenance programme shall be in place. Minor Compliance | Yes | Giram SOU continued to maintain its road, according to the road maintenance programmes. The programmes had been supported by adequate provisions in the budgets. For road maintenance both estates had used motor graders and tractor drawn rollers, back hoes, tractors with back buckets and excavators. For resurfacing crusher run were purchased. Surface run off water from roads is directed into fields and road side drains. De-silting of drains was carried out with excavators. |
| | 4.3.4 | Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. Major Compliance | Yes | No peat soils were found during the field visit in Giram SOU. |
| | 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 | No peat soils were found during the field visit in Giram SOU. |
| | 4.3.6 | A management strategy shall be in place for other fragile and problem soils (e.g. podzols and acid sulphate soils). Minor Compliance | Yes | There were no fragile and problem soils in Giram SOU. |
| C 4.4 Practices maintain the quality and availability of surface and ground water. | 4.4.1 | An implemented water management plan shall be in place. Minor Compliance | Yes | Water management plans and the implemented action plans were available and reviewed during audit. |
| | 4.4.2 | Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. Major Compliance | Yes | Giram SOU continues to implement their SOP and Policy on maintenance of the riparian zone. The buffers had been identified in accordance with Sabah Water Resources Enactment (1998). Interviews with the workers revealed that they understood the requirement of keeping the riparian zones free from any agricultural activities such as application of fertilizer and chemical weeding. SOU 29 had maintained the protection on water courses, including maintaining and restoring appropriate riparian buffer zones along all natural waterways within the estate. There was no infringement of buffer zone sighted. |
| | 4.4.3 | Appropriate treatment of mill effluent to required levels and | Yes | Site visit at effluent treatment plant and interview with operator in charge was revealed the operation was in accordance with standard operation procedure and legal requirements. No sight |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | Comply Yes/No | Findings |
|--|---|---------------|---|
| | regular monitoring of discharge quality, shall be in compliance with national regulations. Minor Compliance | | of effluent over flow and flow meter reading was recorded daily. Giram POM Analysis of the final discharge was carried out on monthly basis. The analysis results were submitted to DOE through the quarterly report. Results were in compliance with the regulatory limit. |
| | 4.4.4 Mill water use per tonne of FFB shall be monitored. Minor Compliance | Yes | The mill processed water obtained from Kalumpang River for its use. Water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis. |
| C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate IPM techniques. | 4.5.1 Implementation of Integrated Pest Management (IPM) plans shall be monitored. Major Compliance | Yes | Giram SOU continued to implement Integrated Pest Management (IPM) in both estates and continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Agricultural Reference Manual (ARM) Section 15 - Plant Protection. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. |
| | 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 - Plant Protection entitled Rat baiting was conducted by Assistant Managers of both estates. Records of training were available for verification. |
| 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 | Giram SOU continued to use agrochemicals based on its Agricultural Reference Manual (ARM) Section 15 and 16, SSOP and in the Pictorial Safety Standard Book (PSS) where written justifications had been provided for various fields operations. The Manual has included a chemical register list which indicates the use of selective products that are specific to the targeted pests, weeds or diseases. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs. The chemical registers for both estates to 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 & no. of applications) shall be provided. Major Compliance | Yes | Giram SOU had records to show the types of pesticides used with active ingredients and their LD50 and 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 were recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available for verification |
| | 4.6.3 Any use of pesticides shall be minimised as part of a plan, and in accordance with IPM plans. There shall be no prophylactic use of pesticides, except in specific | Yes | Giram SOU were committed to minimise the usage of pesticides by implementing Integrated Pest Management (IPM) with the increased in the planting of beneficial plants such as <i>Tunera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> . Blanket spraying were not practiced by this SOU and soft grasses were maintained in the inter row of the fields. It had also been the practice that pesticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) and that no prophylactic use of such pesticides would be |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|---------------|--|
| | situations identified in industry's Best Practice. Major Compliance | | 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 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). Minor Compliance | Yes | Both estates only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register, it was noted that all pesticides used were of class ii, iii & iv. The use of paraquat had been banned in all SDPB estates. There was no evidence of pesticides that were categorised as World Health Organisation Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. From records and interviews with workers, staff and estate assistants, found that they were trained, all precautions taken and all legal requirements met. |
| 4.6.5 | Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers. Major Compliance | Yes | Records showed that pesticides were handled, used and applied by trained persons and as per the MSDS of the pesticide. The 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 were available at all sites during the audit. Training on pesticide handling and spraying technique was carried out accordingly. The training included the safety aspects and usage of PPE when handling with pesticides. Record of training was available for verification. |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | Comply Yes/No | Findings |
|--------|---|---------------|---|
| | 4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Regulations. Major Compliance | Yes | The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). Records of purchase, storage and use were maintained. All of the stores were equipped with exhaust fans and the door was secured. Only authorized personnel are allowed to handle the chemicals. All the chemicals were segregated accordingly. Empty pesticides containers were triple rinsed, holes punched in them and stored separately in the scheduled wastes store awaiting proper disposal. |
| | 4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance | Yes | Pesticide applications were guided by the company's SOPs such as Safety Standard Operating Procedure, Pictorial Safety Standards, and Security Guidelines (PSS) and Agriculture Reference Manual (ARM). The chemicals used in the Company's estates were the common chemicals used and established in the palm oil industry. Proper PPE and tools were provided to ensure that the application of pesticides were carried out appropriately and thus minimise risks and impact to health and safety. |
| | 4.6.8 Pesticides shall be applied aurally only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant info within reasonable time prior to application. Major Compliance | Yes | Aerial application of agrochemicals were not practiced in Giram SOU. |
| | 4.6.9 Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide-handling shall be demonstrated or made available (see Criterion 4.8). Minor Compliance | Yes | The staffs and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involve and how the chemicals should be used in a safe manner. Attendance list was available for all the training carried out. |
| | 4.6.10 Proper disposal of waste material, according to | | Domestic wastes and recycle wastes were segregated by the workers. Only organic wastes were throw at the landfill. Recycle material such as cans, glass bottle, plastic bottle and paper were |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | Comply Yes/No | Findings |
|---|--|---------------|--|
| | procedures that are fully-understood by workers and managers shall be demonstrated. Minor Compliance | Yes | sent to recycle area. Field inspection and observation confirmed chemicals were applied in accordance with the product safety precautions and workers of its risks. MSDS were made available at point of use e.g. at the workshop, store, and Estate water treatment plant. |
| | 4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. Major Compliance | Yes | All the operating units audited performed the annual medical surveillance by competence OHD. Report indicated all employees were reported to be fit to work at their respective stations In addition there were also checks-up made on monthly basis for the chemical handlers internally by the Estate Medical Assistant. |
| | 4.6.12 No work with pesticides shall be undertaken by pregnant or breast-feeding women. Major Compliance | Yes | Both Mostyn and Giram Estates complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation whereby no work with pesticides is given to pregnant or breast-feeding women. <i>Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan</i> . Both estates maintained the list of sprayers. Identification of pregnancy status was made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation was a standard practice in the estates and in compliance. |
| 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 was implemented through the OSH activities by the Regional PSQM Executives and monitored by PSQM Department at Head Office. Included in the policy was the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors. |
| | 4.7.2 All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance | Yes | Risks of all operations were assessed and documented by the ESH committees. All relevant records available for review. |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | Comply Yes/No | Findings |
|--------|---|---------------|---|
| | <p>4.7.3 All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine ops. & land preparation, harvesting and, if it is used, burning. Major Compliance</p> | Yes | <p>Site visit to the office complex to observe the store management and the chemical mixing area evidenced that workers on duty were fully equipped with mask, rubber gloves, rubber boots & apron. Along the journey inside the field drivers and harvesters were noted to be in safety helmets and their sickle, harvesting knife covered with the approved type. Trainings were provided during musters and also in session held in the estate community hall. The trainings made for the employees were recorded and subjects extracted were mainly related to ESH, SOPs, and pesticide handlings.</p> |
| | <p>4.7.4 The responsible person/s shall be identified. There shall be records of regular meetings bet. the responsible persons 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</p> | Yes | <p>Both the Estates / Mill Managers were appointed as the Chairman of the ESH committee. The letter of appointment dated 02/1/18 for Mostyn Estate signed by the Regional CEO was sighted. The Manager subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the estates. Workers during the meeting participated in the discussion mainly on line site and safety. All units adopted the agenda as released RSQM. This agenda list was sighted and adequate to discuss salient issues relating safety, environmental and health.</p> |
| | <p>4.7.5 Accident & emergency procs shall exist and instructions shall be clearly understood by all workers. Accident procs shall be available in the appr. language of the workforce. Assigned operatives trained in 1st Aid should be present in both field and other ops. & first aid equipment shall be available @ worksites. Records of all accidents shall be kept and periodically reviewed. Minor Compliance</p> | Yes | <p>Accident and emergency procedures are available in adherence to the SPSB policy on 'Crisis Management & Emergency Response' plan PQMS, OSH manual and "Accident and Reporting and Investigation Procedure' in the same manual. Each estates and mill had procedures emergencies situation as listed below in the table. There were formation of ERP Team & ERP for all the identified incidences. The organisation chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were produced by PSQM and amended to tailor to the situation differences in the estates and mills.</p> |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | | Comply Yes/No | Findings |
|---|------------|--|---------------|--|
| | 4.7.6 | All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance | Yes | The Mill and Estates provide medical care and insurance coverage for all the workers. Random records checked confirmed the following; a) Local Workers – covered by SOCSO b) Foreign workers were provided with group insurance as required under the Workmen Compensation Act 1992. |
| | 4.7.7 | Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance | Yes | Records of all accidents were properly kept and filed. The methodology of occupational injuries was recorded using LTA. This was summarized officially in the JKPP 8. Records were kept min 10 years in the office. Summary for the year was described in the JKPP 8, a mandatory requirement for submission to DOSH by Jan of the subsequent year. Cases (if any) were reviewed during safety meetings. Where required submissions of JKPP 6, 7 & 8 to DOSH were compiled under the legislative requirement. Investigations and revision of HIRARC where appropriate were made accordingly. |
| 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 Giram POM and both estates Mostyn and Giram Estate 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. The training program includes ESH Legal & Other requirements, Safe handling of Electrical Equipment, Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000, Accident Investigation Techniques etc |
| | 4.8.2 | Records of training for each employee shall be maintained. Minor Compliance | Yes | The CU had trained their staff, workers and records of training were kept in the RSPO training file at each respective offices. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue. |

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

| Clause | Indicators | | Comply Yes/No | Findings |
|--|------------|--|---------------|---|
| C 5.1 Aspects of plantation & mill management, incl. replanting, that have env. impacts are identified & plans to mitigate the negative impacts | 5.1.1 | An environmental impact assessment (EIA) shall be documented. Major Compliance | Yes | SOU Giram has established its environmental aspects / impacts register associated with their activities. Environmental aspect and impact (EAI) which covers from upstream activities such as FFB reception until downstream processes was sighted during assessment. Identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the most significant environmental receptors were the boiler stack emission which associated with air emission, palm oil mill effluent (POME) discharge and land contamination which related to managing the schedule waste and general waste. For the estate operation, all activities from harvesting, pest and disease, upkeep programme until delivery to mill has been identified. |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | Comply Yes/No | Findings | |
|--|-------------------|---|-----------------|---|
| and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement. | 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 persons. Minor Compliance | Yes | Environmental Aspect and Impact Identification Form & Environmental Impact Evaluation Form was used to identify Aspect & Impact and take necessary action. The record was reviewed and approved by accordingly. It has been verified that no changes were made to the record. |
| | 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 and negative environmental impacts. Minor Compliance | Yes | Available and verified during audit. |
| C 5.2 The status of rare, threatened or endangered species other HCV habitats, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced. | 5.2.1 | Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations. Major Compliance | Yes | Identification and assessment of HCV habitats and protected areas within landholdings; and attempt assessments of HCV habitats and protected areas surrounding landholdings was conducted accordingly. |
| | 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 | There was no RTE observed in the CU. However, the CU had regular programmes to educate its employees pertaining to the protection of the RTE as well as the protection of buffer zone. The CU has conducted a regular patrol of HCV areas, access and boundary of estates. Signage, such as “No Hunting”, “No Fishing”, “Buffer Zone” were available. No use of chemicals observed been applied in the buffer zone as prohibited by the CU. |
| | 5.2.3 | There shall be a programme to regularly educate the workforce | Yes | In both estates, the training programs for 2019 has included HCV training programme. HCV briefing were also carried out during muster and the attendance lists were available. |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | | Comply Yes/No | Findings |
|--|------------|---|---------------|---|
| | | about the status of these RTE species & 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 | | |
| | 5.2.4 | Where an action plan has been created there shall be ongoing monitoring: The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; Outcomes of monitoring shall be fed back into the action plan. Minor Compliance | Yes | Progress of implementation of the action plans 'HCV Action Plan (continuous) for FY 2019 for Mostyn and Giram Estate' were reviewed and verified on the ground. Noted the CU had continued to implement planned actions such as awareness to the staffs and public on enhancing biodiversity, posting of relevant information in the Sime Darby webpage and erection of signage at strategically locations. |
| | 5.2.5 | Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. Minor Compliance | Yes | There was no HCV set-asides with existing rights of local communities in SOU Giram. |
| C 5.3 Waste is reduced, recycled, re-used, and disposed of in an environmentally and socially responsible manner. | 5.3.1 | All waste products and sources of pollution shall be identified and documented. Major Compliance | Yes | SOU Giram has identified all wastes and sources of pollution. The Waste Management Action Plan 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 the 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 | 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. Mill wastes had been disposed as follows; EFBs were sent for mulching in the field, while crop residue/biomass i.e. fiber and shell were used as fuel in the boiler. On the monitoring of water and effluent discharge, a monthly and quarterly report for final discharge |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | | Comply Yes/No | Findings |
|---|-------------------|--|----------------------|---|
| | | | | were submitted to DOE in a timely manner, as required by the written approval. On the scheduled waste management, the wastes were disposed through DOE's licensed contractors. The SW management was in compliance with the legal requirement. |
| C 5.4 Efficiency of FF use and the use of RE is optimised. | 5.4.1 | A plan for improving efficiency of the use of FF and to optimise RE shall be in place and monitored. Minor Compliance | Yes | A plan for improving the efficiency of the use of fossil fuels (FF) was in place incorporated into the Environmental Aspect and Impact activities report for 2019. |
| 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 | There was no land preparation in Giram SOU by burning ever since SDPB practice zero burning as per the policy. The use of fire for waste disposal and for preparing land for oil palm cultivation or replanting was not practiced in both estates. From field visits (2016 Replants) and interviews with the workers there is no open burning being practiced in the estates The Group policy of "Zero open burning" has been enforced since July 2008. The operating units adhered to the policy of "Zero open burning" for any replanting. |
| | 5.5.2 | Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Minor Compliance | Yes | There was no evidence that fire had been used to prepare land for replanting in both Giram and Mostyn Estates. No fire was used for waste disposal. |
| 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 | 5.6.1 | An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). | Yes | The CU had conducted an assessment of all polluting activities including gaseous emissions and effluent discharges in the identification of environmental impact assessment. Management plans called the 'Prevention Pollution Plan' FY2019 were established at each sites. These documents included all activities in the estates and mill including gaseous emissions from boiler, gensets, and transportation. The management monitored the use of fossil fuel and its renewable energy on monthly basis. For the estates, the most significant receptors to soil were pesticides (spillage) and at Giram Estate it include domestic waste at own operated landfill. No changes of environmental aspects and impact or new polluting activities observed. The existing EIA and EIE documents maintained identified generation of gaseous emissions from its operation such as lorries and farm tractor. Noted the documents had been reviewed annually at each operating units assessed. |
| | 5.6.2 | Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance | Yes | SOU Giram had identified significant pollutants and greenhouse gas (GHG) emissions and continue to maintain its documented plans to mitigate environmental pollution associates to its activities. The environmental aspects for air pollution were identified. The action plan and continuous improvement plan named Action Plan to reduce GHG was established in the mill and both estates. |
| | 5.6.3 | A monitoring system shall be in | | The CU had used RSPO Palm GHG version 3.0.1 Calculator as a tool to calculate the GHG |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | Comply Yes/No | Findings | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|-----------------------|---|--------------------|-----------------------------|-------------------------|---|-----|------|-----|-------|----|------|-----|------|----------|----|-----------------|---------|--------------------|---|-------------------------|---|-----------------------------|---|-------|---------|------------|------|---------------|-----------|---------------|----------|-------------|-----|--|--|-------|--|--|--------------------|-----------------------|-------------------------|--------------------|-----------------------|-------------------------|-----------------|----------|------|------|------|------|---|--|---------|------|------|------|------|------|---------------------------|---------|------|------|-----|------|------|
| <p>is also recognised that it is not always feasible or practical to reduce or minimise these emissions.</p> <p>Growers and millers commit to an implementation period until the end of December 2016 for promoting best practices in reporting to the RSPO, and thereafter to public reporting. Growers and millers make this commitment with the support of all other stakeholder groups of the RSPO.</p> <p>Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p> | <p>place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.</p> <p>Minor Compliance</p> | <p>Yes</p> | <p>emissions. The SOU has used option 1 full version to calculate the data. The input data was verified and the following were determined:</p> <p>Summary of net GHG emissions from PalmGHG calculator</p> <p>Palm GHG : Option 1</p> <table border="1" data-bbox="1052 470 2040 643"> <thead> <tr> <th>Description</th> <th>tCO₂e/tProduct</th> <th>Extraction Rate</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>1.23</td> <td>OER</td> <td>22.28</td> </tr> <tr> <td>PK</td> <td>1.23</td> <td>KER</td> <td>4.87</td> </tr> </tbody> </table> <table border="1" data-bbox="1068 667 1700 932"> <thead> <tr> <th>Land Use</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>OP Planted Area</td> <td>12275.8</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>12275.8</td> </tr> </tbody> </table> <table border="1" data-bbox="1052 957 1500 1086"> <thead> <tr> <th>Production</th> <th>t/yr</th> </tr> </thead> <tbody> <tr> <td>FFB Processed</td> <td>136078.02</td> </tr> <tr> <td>CPO Processed</td> <td>30316.95</td> </tr> </tbody> </table> <p>Summary of Plantation/field emissions and sink</p> <table border="1" data-bbox="1052 1134 2040 1385"> <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>Land conversion</td> <td>60623.46</td> <td>9.42</td> <td>0.44</td> <td>9.51</td> <td>0.38</td> <td>0</td> </tr> <tr> <td>CO₂ emission from fertiliser</td> <td>5913.82</td> <td>0.91</td> <td>0.04</td> <td>6.27</td> <td>1.14</td> <td>0.05</td> </tr> <tr> <td>N₂O emission</td> <td>4190.59</td> <td>0.63</td> <td>0.03</td> <td>3.7</td> <td>0.67</td> <td>0.03</td> </tr> </tbody> </table> | Description | tCO ₂ e/tProduct | Extraction Rate | % | CPO | 1.23 | OER | 22.28 | PK | 1.23 | KER | 4.87 | Land Use | Ha | OP Planted Area | 12275.8 | OP Planted on Peat | 0 | Conservation (forested) | 0 | Conservation (non-forested) | 0 | Total | 12275.8 | Production | t/yr | FFB Processed | 136078.02 | CPO Processed | 30316.95 | 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 | Land conversion | 60623.46 | 9.42 | 0.44 | 9.51 | 0.38 | 0 | CO ₂ emission from fertiliser | 5913.82 | 0.91 | 0.04 | 6.27 | 1.14 | 0.05 | N ₂ O emission | 4190.59 | 0.63 | 0.03 | 3.7 | 0.67 | 0.03 |
| Description | tCO ₂ e/tProduct | Extraction Rate | % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CPO | 1.23 | OER | 22.28 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PK | 1.23 | KER | 4.87 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Land Use | Ha | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| OP Planted Area | 12275.8 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| OP Planted on Peat | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Conservation (forested) | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Conservation (non-forested) | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 12275.8 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Production | t/yr | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| FFB Processed | 136078.02 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CPO Processed | 30316.95 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Land conversion | 60623.46 | 9.42 | 0.44 | 9.51 | 0.38 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CO ₂ emission from fertiliser | 5913.82 | 0.91 | 0.04 | 6.27 | 1.14 | 0.05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| N ₂ O emission | 4190.59 | 0.63 | 0.03 | 3.7 | 0.67 | 0.03 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | Comply Yes/No | Findings | | | | | | |
|--|------------|---------------|--|-----------------|-------------|-------------|-------------------|-------------|------------|
| | | | Fuel consumption | 940.7 | 0.15 | 0.01 | 2.39 | 0.44 | 0.02 |
| | | | Peat Oxidation | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | Crop sequestration | -59176.68 | -9.16 | -0.43 | -51.3 | -9.29 | -0.37 |
| | | | Sequestration in conservation area | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | Total | 12491.89 | 1.95 | 0.09 | 13.31 | 2.47 | 0.1 |
| Summary of Mill emission and credits | | | | | | | | | |
| | | | Description | tCO2 | | | tCO2e/tFFB | | |
| | | | POME | 30740.77 | | | 0.23 | | |
| | | | Fuel Consumption | 1656.2 | | | 0.01 | | |
| | | | Grid Electricity Utilisation | 658.19 | | | 0 | | |
| | | | Export of Excess Electricity to Housing & Grid | 0 | | | 0 | | |
| | | | Sale of PKS | 0 | | | 0 | | |
| | | | Sale of EFB | 0 | | | 0 | | |
| | | | Total | 33055.16 | | | 0.24 | | |
| Palm Oil Mill Effluent (POME) Treatment | | | | | | | | | |
| | | | Diverted to compost | | | | 0 | | |
| | | | 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 | | |

RSPO PUBLIC SUMMARY REPORT

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 | A SIA has been carried out for SOU 29 Giram and a report dated September 2013 was produced and sighted during the audit. Records of all consultation meetings were documented and sighted. |
| | 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 SIA report and the stakeholder consultations/meetings attendance records available, there was evidence that the SIA was carried out with the participation of the affected parties. The stakeholder consultations/meetings were attended by the local communities, mandores, workers. |
| | 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 | SIA Action Plan for the CU was prepared taking into account among others, request by local communities, issues raised by SPIEU and input from the Mill. All the Action Plans were tabulated and contains columns for responsibilities for implementation. |
| | 6.1.4 | The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. Minor Compliance | Yes | There was evidence that the Action Plans for each Estate and Mill were being reviewed annually or earlier. It was evident that the plans were being updated with inputs from affected parties. |
| | 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 was no scheme smallholders, and therefore this Indicator was not applicable. |
| C 6.2 There are open and transparent methods for communication | 6.2.1 | Consultation and communication procedures shall be documented. Major Compliance | Yes | Consultation and communications procedures for SOU Giram was documented in the Standard Operating Manual dated in April 2008 entitled "Procedure for External Communications" and also Flowchart and Procedure on Handling Social Issues and Internal Communication and Procedure for external Communication. This document was |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | | Comply Yes/No | Findings |
|---|-------------------|--|----------------------|--|
| and consultation between growers and/or millers, local communities and other affected or interested parties | | | | sighted during the audit. In the case of external communications, they were mainly in the form of correspondence, which were kept in the External Communication File. |
| | 6.2.2 | A management official responsible for these issues shall be nominated. Minor Compliance | Yes | The management official responsible for consultation with stakeholders nominated. Evidences sighted |
| | 6.2.3 | A list of stakeholders, records of all comm, incl. confirmation of receipt and that efforts are made to ensure understanding by affected parties, records of actions taken in response to i/p from stakeholders, shall be maintained. Minor Compliance | Yes | List of stakeholders for each Estate and Mill were sighted during the audit. The stakeholder list for both estates and the mill were updated in Jan 2019. Both lists comprise contractors, suppliers/vendors, local community heads, local hospital police station government agencies such as Labour office, Forestry Department, Kunak District Council, Dept of Environment, Indonesian Consulate Office Tawau, Phillipines Embassy in Kuala Lumpur and neighboring smallholders. |
| C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties | 6.3.1 | The system, open to all affected parties, shall resolve disputes in an effective, timely & appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. Major Compliance | Yes | The procedure for responding to grievances and complaints were outlined in the Sustainable Plantation Management System and in Estate Quality Management System The flow chart of the procedures was sighted and made available on notice boards at the mill and estate office. The system was open to all affected parties and were meant to resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistle-blowers. |
| | 6.3.2 | Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance | Yes | The types of dispute seen within Giram SOU were with regards to complaints on housing defects. Any complaints pertaining to house repairs were being initiated by the affected worker, and his complaint filed in the Job Requisition Form. This was then recorded in Complaint Book Giram Estate which contains details such as date complaint received, type of complaint, name of complainant, action taken, date of repair & acknowledgement by the complainant. The form also provides a column indicating when the complaints were 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 | 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 SOU Giram has procedure for identifying legal, customary or user rights, and compensation process was incorporated in the Sustainable Plantation Management System. |
| | 6.4.2 | A procedure for calculating and distributing fair compensation shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This | Yes | In accordance with the Procedures for Handling Boundaries Disputes (see 6.4.1 above), 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. |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | | Comply Yes/No | Findings |
|---|------------|--|---------------|---|
| and other stakeholders to express their views through their own representative institutions. | | procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance | | |
| | 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 verified during this surveillance audit, there was no negotiations concerning compensation for loss of legal, customary or user rights between the Giram CU and indigenous peoples, local communities and other stakeholders. Therefore this Indicator was not applicable. |
| C 6.5 Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages | 6.5.1 | Documentation of pay and conditions shall be available. Major Compliance | Yes | Documentation of pay and conditions were available in the form of employment contracts and monthly pay slips. The employment contracts specify the payment of minimum wages as per Minimum Wages (Amendment) Order 2018 for each employee, which was RM1100 per month. |
| | 6.5.2 | Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. Major Compliance | Yes | All workers at SOU Giram were issue with employment contracts. The employment contracts were prepared in dual-language, i.e. Bahasa Malaysia and English and contain information on job description, provisions related to wages and allowances, working hours, rest hours, overtime, reasons for dismissal, period of notice, public holidays, maternity, annual and medical leave, special leave, medical privileges, housing facilities, etc. The terms of the employment contract were explained to the workers prior to signing, and this was confirmed by the workers during interview. The employment contracts are valid for an initial period of 2 years with the option to extend for another year from the date of the work permit issued by the Malaysian Immigration, and subsequent annual renewals subject to the approval for the Immigration Department. |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|---------------|--|
| | 6.5.3 Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible. Minor Compliance | Yes | Giram CU provides adequate housing for all their Mill and Estate workers in accordance with the Workers' Minimum Standard of Housing and Amenities Act 1990. Each house has 3 rooms and were generally well maintained. The compound of the housing complex were clean and free of tall grass, and perimeter drains were kept clear of undergrowth. Rubbish disposal was done 3 times per week. This was observed during visits to the Mill and Estate housing. Workers were also given treated water supplies and 24-hour electricity. Medical facilities were extended to the workers as well as their dependents. For more serious illnesses or injuries, workers were sent to Kunak District Hospital for treatment, and any charges incurred would be reimbursed. Housing inspections were being carried out on a weekly basis by the respective Medical Assistants. All the above were being carried out in compliance with the requirements of the Workers' Minimum Standard of Housing Act 1990. |
| | 6.5.4 Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and affordable food. Minor Compliance | Yes | The Company has demonstrated efforts to monitor and improve workers' access to adequate, sufficient and affordable food. Sundry shops were available at the Mostyn and Giram Estates/Mill housing complexes. The sundry shops were required to provide list of prices for all items sold in the shops for price monitoring by the estate/mill. Interviews with workers reveal that the prices at the sundry shops were reasonable and competitive. |
| 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 | Employment contracts that were sampled do not contain any prohibitive clause against workers from joining any trade unions. Recognition of freedom of association was available in the Sime Darby Plantation Social Policy dated Jan 2015 which states that the company respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. This Social Policy was applicable throughout all operating units, printed and translated in Bahasa Malaysia. The policy was seen displayed on notice boards in the estates and mill. |
| | 6.6.2 Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance | Yes | Workers within the Giram CU were members of the Sabah Plantation Industry Employees Union (SPIEU). Minutes of meetings between management and SPIU representatives were sighted as follows: |
| C 6.7 Children are not | 6.7.1 There shall be documentary evidence that minimum age | Yes | The policy on non-employment of children was contained in the Sime Darby Social Policy dated Jan 2015, which was adhered to by Giram CU. There was no evidence that the |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | | Comply Yes/No | Findings |
|--|-------------------|--|----------------------|---|
| employed or exploited. | | requirements are met. Major Compliance | | Giram and Mostyn estates as well as the Giram Palm Oil Mill employ anyone below the age of 18 years. This was verified by examining the master lists of workers. Interviews with workers and staffs, as well as observations made during field visits show that those employed are 18 years and above. |
| 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 was 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 on notice boards in both Bahasa Malaysia and English. |
| | 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 | Based on records such as contract of employment, pay slip and insurance including interview with local workers, foreign workers, there was no evidence of discrimination based on race, religion, gender, national origin or any other form of discrimination. 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 workers (harvesters, sprayers). Foreign workers were also accorded the same living standards and accommodations as local workers. |
| | 6.8.3 | It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. Minor Compliance | 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. Candidates submit their application forms followed by interview assessment and medical check-up. Annual appraisal forms were used to determine the employee's skills and capabilities. An inspection of job advertisements and records of hiring and promotion showed that they were 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 | Giram CU was bound by the Sime Darby Plantation's Social & Humanity Management Policy and the Gender Policy statements both signed by the Managing Director. The policies were sighted display on notice boards in the estates and POM. They were also communicated to all levels of the workforce. |
| | 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 Social & Humanity Management Policy statement signed by the Managing Director in January 2015 was available. The statement included commitment to protect the reproductive rights of women. The policy was also displayed at the estates and mill notice boards. Dissemination on the Policy was done during Gender Committee meetings. |
| | 6.9.3 | A specific grievance mechanism which respects anonymity and protects complainants where | Yes | A specific grievance mechanism which respects anonymity and protects complainants had been established and implemented in Group Policies and Authorities and the staff of SOU Giram had been made aware on this mechanism. Trainings were conducted |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | | Comply Yes/No | Findings |
|---|-------------------|--|----------------------|---|
| | | requested shall be established, implemented, and communicated to all levels of the workforce. Minor Compliance | | accordingly. |
| 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 | The indicator was not applicable as the mill only accepting certified FFB from its owned estates. |
| | 6.10.2 | Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented. Major Compliance | Yes | Three FFB transporters for Giram Estate and Mostyn Estate were interviewed. The representatives confirmed that FFB pricing and pricing mechanism were clearly stipulated and documented in the agreements. The FFB transporters also confirmed that the pricing mechanism was clearly understood. |
| | 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 the interview conducted with the three FFB suppliers, they understood the terms of the contracts they signed with Giram SOU and they were of the view that the agreements were fair, legal and transparent. The renewal of their contracts was determined by a tender system. The transporters have been providing their services between 2 years to 15 years. |
| | 6.10.4 | Agreed payments shall be made in a timely manner. Minor Compliance | Yes | Based on the interview conducted with the three FFB suppliers, all confirmed that payments were made in a timely manner, i.e. within two weeks of issuance of invoices. |
| 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 | Contributions to the local development were done as a result of consultation with the local communities. This include providing job opportunities to the local community, regular upgrading of roads leading to nearby villages as requested by village representative. |
| | 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 scheme smallholders, 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 | There was no evidence of forced or trafficked labour within SOU Giram as observed during field visits and interviews with workers and management. Workers have access to free movements and were allowed to keep their own passports. |
| | 6.12.2 | Where applicable, it shall be demonstrated that no contract substitution has occurred. | Yes | There was no evidence of contract substitution among the workers of SOU Giram as observed during field visits and interviews with workers. They were aware of the types of work they would be doing before they arrived in Malaysia. The actual job undertaken was |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | | Comply Yes/No | Findings |
|---|------------|--|---------------|--|
| | | Minor Compliance | | the same as what they were informed of while they were still in their home country. |
| | 6.12.3 | Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance | Yes | The SOU Giram adopts the Social Policy dated Jan 2015 which states that "All employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work and representation race, caste, nationality". There was also a procedure entitled "Sourcing Process for Foreign Workers". Foreign workers were given an orientation and briefing on their arrival for work. |
| C 6.13 Growers and millers respect human rights | 6.13.1 | A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations. Major Compliance | Yes | The policy to respect human rights was documented in the Sime Darby Plantation's Social and Humanity Management Policy. This Policy states among others, that it will develop its businesses with a sense of humanity, ensuring that they are socially beneficial and do not infringe basic human rights. This policy was communicated to the workers during muster briefings. |
| | 6.13.2 | As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. Minor Compliance | Yes | SOU Giram provide educational access to children of foreign workers via HUMANA school and Community Learning Centre. The HUMANA school has 106 pupils and CLC has 37 pupils. Among the subjects taught were Bahasa Malaysia, English, Science, religious studies and the Indonesian Pancasila. SOU Giram also undertakes the cost of maintaining the CLC and HUMANA school by providing school and classroom furniture, teachers' housing, as well as transportation for pupils. |

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 estate area of Mostyn Estate and Giram Estate. Based on the audit findings, it was confirmed that there were no new planting or new development of areas at Giram CU. Hence, this principle was not applicable to the 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 | 8.1.1 | The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of indicators covered by these Principles and Criteria. | | |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | | Comply Yes/No | Findings |
|--|------------|---|---------------|--|
| continual improvement in key operations. | | As a minimum, these shall include, but are not necessarily be limited to: | | |
| | a) | Reduction in use of pesticides (Criterion 4.6); | Yes | Giram 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>Leguminious</i> Cover Crop mainly <i>Pueraria Javanica</i> and <i>Calopogonium Mucunoides</i> at replanting area in order to minimizing circle and selective weeding. <i>Neprolephis biserata</i> was maintained and encouraged to be planted in Giram 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 have now introduced 60 barn owl boxes on Mostyn 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. |
| | b) | Environmental impacts (Criteria 4.3, 5.1 and 5.2); | Yes | Aspect and Impact assessment were carried out and the significant environmental impacts were identified. Environmental Aspect Identification Summary FY 2019 reviewed accordingly. Environmental Impact Evaluation Summary FY 2019 reviewed accordingly. 'Pollution Identification Environmental improvement action plan' were established at each site and was being monitored. |
| | c) | Waste reduction (Criterion 5.3); | Yes | The CU continued to have documented and implemented waste management plan. i.e. "Waste Management Action Plan 2019". No wastes chemicals were observed. However, scheduled wastes, including empty agrochemical containers continued to be disposed as per applicable regulation. Domestic wastes continued disposed to landfill. Use of EFB and compost were implemented. |
| | d) | Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); | Yes | The management of both estates and mill had plan to reduce emission by daily inspection and monitoring for their farm tractor / lorry and gen set / water treatment plant to prevent any leakage and problem which can impact on smoke emission. |
| | e) | Social impacts (Criterion 6.1); | Yes | The action plan for the continual improvement are being implemented based on consultations with the relevant stakeholders. These include road repairs on access road leading to nearby villages. There was evidence that the plans were being updated with inputs from affected parties. For Mostyn estate, input received was a request by local communities from the villages to repair and upgrade the road leading to their villages. For Giram Palm Oil Mill, the SIA Action Plan took into account feedback from SK Ladang Giram on the issue of rubbish collection services provided by the Mill, from SPIEU on the issue of workshop workers not getting his wages in accordance with the salary scale. |

RSPO PUBLIC SUMMARY REPORT

| Clause | Indicators | Comply Yes/No | Findings |
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| | f) Encourage optimising the yield of the supply base Major Compliance | Yes | As Giram SOU was part of a well-established organisation, Sime Darby Plantations Berhad, the yield performance has always been the top priority in ensuring long-term economic and financial viability. In general, various efforts had been done to optimise the yield of the plantation such as maximising crop recovery, optimum ripeness standard (harvest ripe bunches only and 100% loose fruit collection), the soil fertility were maintained and planting only high yielding planting material. |

RSPO Certifications Systems for Principles & Criteria June 2017

| Clause | Indicators | Comply Yes/No | Findings |
|---|--|---------------|---|
| 4.5.3 Time-bound plan Note: Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised; | (a) As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat. | YES | SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. 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 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 |

RSPO PUBLIC SUMMARY REPORT

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| | | | <p>PT Sandika Natapalma & PT Budidaya Agro Lestari Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing. 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-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 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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RSPO PUBLIC SUMMARY REPORT

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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 & Entapang team (2 of 9 villages). 21 TKPP meetings have been conducted. The most recent one was held on 2/11/2016. |

RSPO PUBLIC SUMMARY REPORT

| | | | 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 rowspan="2">1</td> <td rowspan="2">PT Sime Indo Agro</td> <td>East</td> <td rowspan="2">Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor</td> </tr> <tr> <td>Sei Mawang</td> </tr> </tbody> </table> | # | Name of SOU | Name of Units | Positive assurance statement and self-assessment | 1 | PT Sime Indo Agro | East | Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor | Sei Mawang |
| # | Name of SOU | Name of Units | Positive assurance statement and self-assessment | | | | | | | | | |
| 1 | PT Sime Indo Agro | East | Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor | | | | | | | | | |
| | | Sei Mawang | | | | | | | | | | |

RSPO PUBLIC SUMMARY REPORT

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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 Pecco | Sungai Jernih Estate and GPI KKPA | Sungai Jernih Estate and GPI KKPA were audited by Mutuagung as verified through Recertification Audit report. The assessment was conducted on 15 – 20 May 2017. |

RSPO PUBLIC SUMMARY REPORT

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| | | | | <table border="1"> <tr> <td></td> <td>nina Indonesia</td> <td></td> <td></td> </tr> <tr> <td rowspan="4">6</td> <td rowspan="4">PT Mitra Austral Sejahtera (MAS)</td> <td>MAS 1</td> <td rowspan="4">Internal assessment was conducted on 9 - 10 Nov 2017 by PSQM Indonesia.</td> </tr> <tr> <td>MAS 2</td> </tr> <tr> <td>MAS 3</td> </tr> <tr> <td>Mas Factory Plasma MAS</td> </tr> <tr> <td rowspan="2">7</td> <td rowspan="2">PT Sandika Nata Palma</td> <td>Karya Palma</td> <td rowspan="2">Internal assessment was conducted on 10 Feb 2017.</td> </tr> <tr> <td>KKPA SNP</td> </tr> <tr> <td rowspan="4">8</td> <td rowspan="4">PT Budidaya Agro Lestari</td> <td>Pelanjau (PT BAL)</td> <td rowspan="3">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.</td> </tr> <tr> <td>Sungai Putih (PT BAL)</td> </tr> <tr> <td>Beturus (PT BAL)</td> </tr> <tr> <td>KKPA BAL</td> <td>Smallholder project – targeted for certification by 2020.</td> </tr> </table> | | nina Indonesia | | | 6 | PT Mitra Austral Sejahtera (MAS) | MAS 1 | Internal assessment was conducted on 9 - 10 Nov 2017 by PSQM Indonesia. | MAS 2 | MAS 3 | Mas Factory Plasma MAS | 7 | PT Sandika Nata Palma | Karya Palma | Internal assessment was conducted on 10 Feb 2017. | KKPA SNP | 8 | PT Budidaya Agro Lestari | Pelanjau (PT 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. | Sungai Putih (PT BAL) | Beturus (PT BAL) | KKPA BAL | Smallholder project – targeted for certification by 2020. |
| | nina Indonesia | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | PT Mitra Austral Sejahtera (MAS) | MAS 1 | Internal assessment was conducted on 9 - 10 Nov 2017 by PSQM Indonesia. | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | MAS 2 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | MAS 3 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Mas Factory Plasma MAS | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | PT Sandika Nata Palma | Karya Palma | Internal assessment was conducted on 10 Feb 2017. | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | KKPA SNP | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | PT Budidaya Agro Lestari | Pelanjau (PT 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. | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Sungai Putih (PT BAL) | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Beturus (PT BAL) | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | KKPA BAL | 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 shall consult directly | No additional indicators | YES | As it has been mentioned in 2.2.1 of this checklist, it was evident that the land belongs to the company named Harrisons Malaysian Plantations Sdn Bhd. Harrisons Malaysian Plantations Sdn Bhd merged with Sime Darby in year of 2008. Based on the interviews carried out and this audit finding, it has been confirmed that there was no such case concerning the rights of local communities in Giram. There were no indigenous peoples here, hence this component was not applicable to the CU. | | | | | | | | | | | | | | | | | | | | | | | | | |

RSPO PUBLIC SUMMARY REPORT

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| <p>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> <p>1. For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&C. For example, if an NC against a major indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless that is actively addressed;</p> <p>2. Failure to address any outstanding NC within uncertified unit(s) regarding 4.5.4 (a)-(d) may lead to certificate suspension(s) to the certified unit(s), in accordance with the provisions of these Certification Systems.</p> | | | |

RSPO PUBLIC SUMMARY REPORT

Attachment 4

Details of Non-conformities and Corrective Actions Taken

| P & C Indicator/SCCS Indicator | Specification Major/Minor | Detail Non-conformances | Corrective Action | Verification by Assessor |
|--|----------------------------------|---|--|--|
| <p><u>Module D Identity Preserved</u> Indicator: D.4.2 NCR MZK 02 2019</p> | Major | <p>Finding : There was projected overproduction of certified tonnage. Objective evidence : Sighted that overproduction Projected CSPO IP for period May 2018 – April 2019 which is projected 30,384.06 mt and actual produce is 31,236.24 Conventional and Giram POM yet to inform the CB and apply extension to the RSPO.</p> | <p>Extension of volume for FFB, CPO & PK has been applied through CB and already approved by RSPO. Mill will monitor FFB processed against projected certified tonnage through template established by SQM.</p> | <p>Auditor has verified the email request to the CB for extension volume from SOU Giram to CB on 20/06/2019 and RSPO has approved the Request on 25/06/2019. Auditor also has verify the monitoring form name Projected and Actual FFB Received and RSPO CPO Production and data for period May 2019 – April 2020 has been start to monitored by the Mill.</p> <p>Status : Closed The effectiveness of Corrective action will be verified during next audit.</p> |
| <p>4.1.3 NCR RAR 01 2019</p> | Minor | <p>Finding : First aid kits and emergency equipment were not consistently monitored Objective evidence : • It was found that the harvesting mandore in field 14A of Langgas Division of Mostyn Estate and the maintenance mandore in field 18 G of Ulu Balung Division of Giram Estate do not have any 1st Aid Kit boxes with them when supervising the workers. • At Mostyn Estate (Creche) fire extinguisher was expired on 28/03/2018.</p> | <p>1. The expired Fire extinguisher at crèche has been replace with the renewed Fire Extinguisher. Estate to established proper masterlist for easy monitoring of the fire extinguisher. The masterlist include quantity and location of fire extinguisher. 2. The mandore that did not bring the First Aid Kit has been given warning letter. Estate HA/MA will conduct refresher training on First Aid Kit to the first aider and mandore.</p> | <p>Corrective Action Plan Accepted</p> <p>Status : Open The effectiveness of Corrective action plan will be verified during next audit.</p> |

RSPO PUBLIC SUMMARY REPORT

Attachment 5

RSPO SUPPLY CHAIN : AUDIT CHECKLIST

RSPO SUPPLY CHAIN : AUDIT CHECKLIST (INCLUDING MULTISITE /GROUP CERTIFICATION OPERATIONS)

SECTION A : GENERAL INFORMATION

| | |
|--|---|
| 1. File Reference No. | : ES10170016 |
| 2. Name of facility/ site(s) /entity(ies) | : Sime Darby Plantation Berhad – Giram 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 | : CPO Projected: 30,384.06mt PK Projected: 6,803.42mt CPO Sell: 31,236.24 mt CPO Claim as Identity Preserved: 0 mt CPO Claim as Non-RSPO: 31,236.24 mt PK Sell: 6,353.97 mt PK Claim as Identity Preserved: 5,086.06 mt PK Claim as Non-RSPO: 1,267.91 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 |

RSPO PUBLIC SUMMARY REPORT

| 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>Giram 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. Sighted Giram palm oil mill 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 procedure described the following:</p> <ul style="list-style-type: none"> • Clause 3.0 ~ Scope for handling certified sustainable product • Clause 4.0 ~ the responsibility of for the implementation of RSPO SCC i.e. head of operating unit • Clause 5.0 ~ Control of document & records such as weighbridge tickets, consignment note , training record & contracts. Record retention for 10 years. Define the critical control point (CCP) :estate – weighbridge, mill – weighbridge, admin office, ramp, CPO despatch area, CPO storage tank. Kernel silos. • Clause 6.0 ~ Delivery of FFB from the estate – relevant record involved, flowchart for crop diversion, list of mill and their supply chain model i.e. IP or MB • Clause 7.0 ~ Receiving FFB at the mill – list of supply base, rules for determining diverted FFB destination, relevant record • Clause 8.0 ~ Production of ISCC certified Waste/Residues Materials at the Mill • Clause 9.0 ~ process monitoring – for IP model mill need to ensure no mixing of RSPO certified and non-certified • Clause 10.0 ~ Product despatch – [Clause 10.1] all delivery of CPO and PK shall be in accordance with the contract allocated by Global Trading & Marketing (GTM) department. [Clause 10.2] Outgoing document for CPO and PK 9e.g. contract, weighbridge ticket / despatch note) shall specify the following information which can be either presented in single document or across a range of document Trade name / RSPO IP, RSPO certificate no. : RSPO 0025, • Clause 11.0 ~ Non-conforming products and/or Documents – requirement to downgrade the RSPO Product • Clause 12.0 ~ product claim – shall follow RSPO rules on market communication & claim • Clause 13.0 ~ Outsourced contractor - the mill has established list of outsourced contractor. Sighted list of transporter for CPO and PK. • Clause 14.0 ~ Training – the mill shall provide training for relevant personnel carrying the task at tech critical control point (CCP). • Clause 15.0 ~ Reclassification of mill's supply chain model - Reclassification of |

RSPO PUBLIC SUMMARY REPORT

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| | | <p>mill's supply chain model may be determined by GTM/ PSQM. CB shall be notified. All communicated shall be recorded.</p> <ul style="list-style-type: none"> • Clause 16.0 ~ Production volume • Clause 17.0 ~ Conversion Factors • Clause 18.0 ~ Internal Audit • Clause 19.0 ~ Complaints • Clause 20.0 ~ Management Review <p>The procedure was kept in file RSPO Supply Chain Manual (SCM/RSPO/SD) Appropriate changes were also made in the change to include the new clause Production of ISCC certified Waste/Residue Materials at the Mill. There was no evidence that Giram POM seeking certification outsources activities to independent third parties.</p> |
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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. | Giram 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 Giram 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 Register under name: Giram Oil Mill |
| 1.4 | Processing aids do not need to be included within an organization's scope of certification. | No processing aid involved in Giram POM scope of certification |
| 2 | Supply chain model | |
| 2.1 | The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance. | Giram 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 implemented. |

RSPO PUBLIC SUMMARY REPORT

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| | <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - For MB check the conversion factor used and the mass balance table. | |
| 2.2 | The site can use one (1) or a combination of supply chain models as audited and certified by the CB. | Giram POM has continued to maintain IP 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: | Giram POM had revised their documented procedure title ' <i>Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001</i> ' |
| 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 Giram POM. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they understood the supply chain requirements. |
| 3.2 | <p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <ul style="list-style-type: none"> 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. <p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct nonconformities shall be subject to management review at least annually. The organization shall be able to maintain the internal audit records and reports.</p> | RSPO internal audit was conducted in Jan 2019 by a qualified internal auditors. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. |
| 4 | Purchasing and goods in | |
| 4.1 | <p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; | Giram POM had continued received FFB supply from own company estate namely Giram Estate and Mostyn Estate and diversion Crop from SOU Binuang. |

RSPO PUBLIC SUMMARY REPORT

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| | <ul style="list-style-type: none"> • 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> | |
| 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. | Giram POM had continued received source of RSPO certified FFB from own group estate. |
| 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. | Giram POM has registered in IT platform RSPO membership no : 1-0008-04-000-00 Registered under parent company: SIME DARBY PLANTATION BERHAD Register under name: Giram Oil Mill |
| 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 - Request the PIC to demonstrate where in the RSPO IT platform this can be found. | GPOM had continued received FFB supply from own company estate namely Giram Estate and Mostyn Estate and diversion Crop from SOU Binuang. |

RSPO PUBLIC SUMMARY REPORT

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| 4.2 | The site shall have a mechanism in place for handling non-conforming material and/or documents. | GPOM had started implementing the electronic system 'Simweigh' 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 GPOM, the lorry driver surrendered the 'card' to the Weighbridge Clerk. The 'card' was then scanned and the relevant information on the certified FFBs was then captured and stored in a data base. On processing, GPOM still referred to the sales contract issued by the Headquarters office for production planning. |
| 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. 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 information, when this is announced in advance. | <ol style="list-style-type: none"> a) There was 1 outsource company CPO and PK transporter. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training was sighted. b) There was contract document between Giram 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. |

RSPO PUBLIC SUMMARY REPORT

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| | <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. |
| 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 Giram 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 • are part of the supply chain of RSPO Certified Sustainable oil palm products | Giram POM has legal ownership and physical handle RSPO certified sustainable CPO and PK. |

RSPO PUBLIC SUMMARY REPORT

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| | must register their transaction in the RSPO IT platform at the time of physical shipment as required by the rules set by RSPO. | |
| 8 | Training | |
| 8.1 | The organization shall have a defined training plan, which is subject to on-going review and is supported by records of the training provided to staff. Additional Guidance: - Availability of an approved annual training plan; and - Training record (training attendance list) | Training plan has included the RSPO Supply chain training scheduled in March 2019 for staff & workers. |
| 8.2 | Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification system. Training shall be specific and relevant to the task(s) performed. <u>Additional Guidance:</u> - 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. | Training was conducted for Staff in Jan 2019 by RSPO SC PICs by QA, Office Clerk, Weighbridge Clerk, Auxiliary Police, and Assistant Engineer. Attendance list & photograph was seen. |
| 9 | Record keeping | |
| 9.1 | The site shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements. | Sighted CPO and PK delivery note, weighbridge ticket, production data and internal audit records were found up-to-date. |
| 9.2 | Retention times for all records and reports shall be a minimum of two (2) years and must comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. | Relevant record was maintained for more than 2 years. |
| 9.3 | The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months. | Available. |
| 10 | Conversion factors | |
| 10.1 | Where applicable a conversion rate must be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which must be based upon past experience, | Mill OER and KER used as conversion factor. |

RSPO PUBLIC SUMMARY REPORT

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| | <p>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).</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - 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 . | |
| 10.2 | <p>Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Request client to demonstrate the conversion factor used and check the mass balance table. | Actual OER and KER used. Updated on monthly basis. |
| 11 | Claims | |
| 11.1 | The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Communications and Claims. | No claim been made. |
| 12 | Complaints | |
| 12.1 | <p>The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.</p> <p><u>Additional guidance</u></p> <ul style="list-style-type: none"> - Procedure shall cover complaints from customers and stakeholders. | Giram 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 | <p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO SCCS • Customer feedback • Status of preventive and corrective actions • Follow-up actions from management reviews • Changes that could affect the management system • Recommendations for improvement | Management review meeting dated in May 2019 reviewed. |
| 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 | Recommendation for improvement – improve the established system Resource sufficient. |

RSPO PUBLIC SUMMARY REPORT

processes
• Resource needs

Giram palm oil mill – Identity Preserved Model –Module D

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| D 3 | Documented procedures | a) Giram POM had revised their documented procedure title ‘ <i>Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001</i> ’. |
| D 3.1 | The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements in these requirements; b) The 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. | b) The Assistant Engineer has the overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Giram 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 | The site shall have documented procedures for receiving and processing certified and non-certified FFBs. | Clause 7.0 of <i>SOP for Sustainable Supply Chain and Traceability</i> , issue no 5 has described how the Giram POM manages the FFB from certified source. It was confirmed that no non-certified FFB was received by Giram POM. |
| D.4 | Purchasing and goods in | Giram POM will only accept the RSPO certified FFB which are from Sime Darby’s own estates i.e. Mostyn Estate and Giram Estate. Monitoring records titled as “ <i>RSPO Records for Oil Mills</i> ” has recorded the tonnage of certified FFB and its supplying estate. There was no non-certified FFB received based on the records only Diversion from Certified Estate such as Binuang Estate, Jeleta Bumi, Tingkayu and Sungang Estate. |
| D.4.1 | The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. | |
| D 4.2 | The site shall inform the CB immediately if there is a projected overproduction. | Sighted that overproduction Projected CSPO IP for reviewed period. Thus, Major NCR MZK 01 2019 was raised. |
| D.5 | Record keeping | Giram 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>Mass Balance Records for Oil Mills FY 2018/2019</i> ”. |
| D.5.1 | 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. | |
| D 6 | 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 (Giram). The dispatch of the RSPO certified CPO to KBI by the supplying POMs was made based on a specific contract. |
| D.6.1 | | |
| D.6.2 | The objective is for 100 % segregated material to be reached. | Giram 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. |
| Annex 1 – Supply Chain Yield Schemes – Not Applicable | | |
| Annex 2 – Book & Claim (BC) – Not Applicable | | |

RSPO PUBLIC SUMMARY REPORT

Annex 3 – RSPO Rules on Communications and Claims

| Module A – IP and SG specific rules | |
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| <p>Certified oil palm content</p> <ul style="list-style-type: none"> • For IP, 95% or above of the oil palm content must be RSPO IP-certified. • For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP. • Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume. | <p>Not Applicable</p> |
| <p>Labelling and trademark</p> <p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. <p>Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch).</p> <p>In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</p> | <p>Not Applicable</p> |

RSPO PUBLIC SUMMARY REPORT

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| <p>Messaging Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none">• The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org• The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. | <p>Not Applicable</p> |
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RSPO PUBLIC SUMMARY REPORT

Attachment 6

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

| P & C Indicator | Specification Major/Minor | Detail Non-conformances | Corrective Action | Verification by Assessor |
|-----------------------------|---------------------------|--|--|---|
| 1.1.2 NCR MZK 01 2018 | Major | <p><u>Finding :</u> Records of request and Information regarding Certified Area was found incorrect</p> <p><u>Objective evidence :</u> The information given to CB regarding Certified Area at SOU Giram since 2015 (Stage 2 Audit) was not correct.</p> | <p>The correct estate hectarage has been referred from the latest SEMUA hectarage system which included all inactive and active fields. Mostyn Estate also has been establish the land title summary for easy reference (both SEMUA hectarage and Mostyn Estate land title summary are as attached). Auditor has verified the Land Title and Data from SEMUA system records. It has been confirmed that information tally with Land Title. The certified area in the Report has already been changed by the auditor.</p> | <p>Auditor also verify the latest SEMUA hectarage system 2019 which included all inactive and active fields. And all Estate has establish the land title summary for easy reference. All land are same with stated Legal Land Title.</p> <p>CLOSED.</p> |

RSPO PUBLIC SUMMARY REPORT

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 | | | |
| | | Sg. Samak Estate | | | |

RSPO PUBLIC SUMMARY REPORT

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| | | 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 | | | |
| 11 | Kerdau | Jentar Estate | Temerloh, Pahang | | |
| | | Mentakab Estate | | | |

RSPO PUBLIC SUMMARY REPORT

| | | | | | |
|----|-------------|------------------------|-------------------------------|-----------|--|
| | | Chenor Estate | | 7-Jul-11 | |
| | | 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 | | | |
| | | Pertang Estate | | | |
| 17 | Kempas | Kempas Oil Mill | Jasin, Melaka | 19-May-10 | |
| | | Kempas Estate | | | |

RSPO PUBLIC SUMMARY REPORT

| | | | | | |
|----|-----------------|-------------------------------|---------------|-----------|--|
| | | 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 | Kluang, Johor | 5-Oct-11 | * 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 | | | |

RSPO PUBLIC SUMMARY REPORT

| | | | | | |
|----|--------------|-----------------------|----------------------|-----------|--|
| | | 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 Pulai 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 | | | |

RSPO PUBLIC SUMMARY REPORT

| | | | | | |
|----|----------|-------------------------|------------------|-----------|---|
| 30 | Merotai | Merotai Oil Mill | Tawau, Sabah | 16-Jan-09 | |
| | | Merotai Estate | | | |
| | | Imam Estate | | | |
| | | Tiger Estate | | | |
| | | Table Estate | | | |
| 31 | Lavang | Lavang Oil Mill | Bintulu, Sarawak | 30-Dec-11 | |
| | | Lavang Estate | | | |
| | | Rasan Estate | | | |
| | | Belian Estate | | | |
| | | Kelida Estate | | | |
| 32 | Rajawali | Lavang (Special) Estate | Bintulu, Sarawak | 30-Dec-11 | |
| | | Pekaka Estate | | | |
| | | Ruai Estate | | | |
| | | Dulang Estate | | | |
| | | Charquest Estate | | | |
| | | Paroh Estate | | | |
| 33 | Derawan | Rajawali Oil Mill | Bintulu, Sarawak | 30-Dec-11 | |
| | | Rajawali Estate | | | |
| | | Samudera Estate | | | |
| 34 | Bintang | Semarak Estate | 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 |
| | | Bayu Estate | | | |
| 33 | Derawan | Derawan Oil Mill | Bintulu, Sarawak | 30-Dec-11 | |
| | | Derawan Estate | | | |
| | | Sahua Estate | | | |
| | | Takau Estate | | | |
| | | Damai Estate | | | |

RSPO PUBLIC SUMMARY REPORT

has completed the selling off transaction.

Legends

NA - NOT APPLICABLE

RSPO PUBLIC SUMMARY REPORT

| 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 | | |
| | | Gunung Sari Estate | - | Tanah Bumbu District – South Kalimantan | Certified | 9-Nov-16 | |
| 3 | PT LADANGRUMPUN SUBURUBADI | 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 Certification by 2020 as reported in the timebound plan. Socialisation with the |

RSPO PUBLIC SUMMARY REPORT

| | | | | | | | |
|---|------------------------------|---------------------|------|--------------------------------------|-----------|--------------------------------------|--|
| | | | | | | | 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 | | |
| | | | | Binturung Estate | - | Kotabaru District – South Kalimantan | Certified |
| 8 | PT PARIPURNA SWAKARSA | Rampa Estate | - | | Certified | | |
| | | Sesulung Estate | - | | Certified | | |
| | | Gunung Aru Mill | - | | Certified | | |
| | | Gunung Aru | - | | Certified | | The new project at KKPA Maju Bersama by the plasma community is currently in |
| | | Gunung Kemas Estate | - | | Certified | | |
| 9 | PT BERSAMA SEJAHTERA SAKTI | | | | | | Nursery stage and not yet due for harvesting, the year of planting was in 2014. |
| | | | | Kotabaru District – South Kalimantan | | 21-Oct-16 | |
| | | Laut Timur Estate | - | | Certified | | |
| | | Pantai Timur Estate | - | | Certified | | |
| | | KKPA MBP | 2019 | | - | | |
| | | Rantau Panjang Mill | - | | Certified | | |

RSPO PUBLIC SUMMARY REPORT

| | | | | | | | |
|----|----------------------------|---|------|---|-----------|-----------|---|
| | | 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 | | |
| | | Pemantang | - | | Certified | | |
| 15 | PT TEGUH SEMPURNA | Kawan Batu Estate | - | Seruyan and East Kotawaringin District – Central Kalimantan | Certified | 9-Sep-16 | |

RSPO PUBLIC SUMMARY REPORT

| | | | | | | | |
|----|---|----------------------------|------|--|-----------|-----------|--|
| | | 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 | | |
| 20 | PT PADANG PALMA PERMAI/PT PERKASA SUBUR | Batang Ara (PT PSK) Estate | - | Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam | Certified | 3-May-13 | |

RSPO PUBLIC SUMMARY REPORT

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|----|-----------------------------------|--|--------------|--|-----------|----------|--|
| | SAKTI | 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 Sungai Putih (PT BAL) Estate | 2019 2019 | | | | Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing |
| 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 | | - | | |

RSPO PUBLIC SUMMARY REPORT

INDONESIA – PT MAS UPDATE

| | |
|---|--|
| RSPO Certification Target Date for PT MAS | The target date for certification was 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> |

RSPO PUBLIC SUMMARY REPORT

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 | NA | Milne Bay Province, Papua New Guinea | Certified | 15-Feb-18 |
| | | Giligili Estate | | | | |
| | | Waigani Estate | | | | |
| | | Sagarai Estate | | | | |
| | | Padipadi Estate | | | | |
| | | Mariawatte Estate | | | | |
| | | East Gurney Estate | | | | |
| | | West Gurney Estate | | | | |
| | | East Sagarai Estate | | | | |
| | | West Sagarai Estate | | | | |
| | | 3 | | | | |
| Kara Estate | | | | | | |
| Nalik Estate | | | | | | |
| West Coast Estate | | | | | | |
| Noatsi Estate | | | | | | |
| Madak Estate | | | | | | |

RSPO PUBLIC SUMMARY REPORT

| | | | | | | |
|---|---|-----------------------------|----|------------------------------------|-----------|----------|
| | | 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 | | | | |
| | | 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 | | | | |

RSPO PUBLIC SUMMARY REPORT

| 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 |

RSPO PUBLIC SUMMARY REPORT

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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. |
|--|--|-------------|--------|--|------|--|

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> |
| | | Bomi Estate | | | | |
| | | Lofa Estate | | | | |
| | | Matambo Estate | | | | |
| | | Grand Cape Mount Estate | | | | |