



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

File Ref: ES10170005

RSPO PUBLIC SUMMARY REPORT

CLIENT : SIME DARBY PLANTATION BERHAD – SOU 17 KEMPAS  
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 / Estate	Location		
		Latitude	Longitude	Address
KEMPAS Strategic Operating Unit (SOU 17)	Kempas Oil Mill	N 2.3211	E 102.4269	77000, Jasin, Melaka
	Kempas Estate	N 2.2770	E 102.4652	71000, Jasin, Melaka
	Kemuning Estate	N 2.4643	E 102.3380	76460, Tebong, Melaka
	Tangkah Estate	N 2.3435	E 102.6375	84900, Tangkak, Johor

MAP : See Attachment 1

AUDIT DATE : 22-25 January 2019

DURATION : 20 auditor days

TYPE OF AUDIT :  Annual Surveillance Audit 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 Mass  
Balance Supply Chain Model

VALIDITY OF RSPO CERTIFICATE : 20/5/2015-19/5/2020

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 Razman Salim

Name : SIME DARBY PLANTATION BERHAD  
KEMPAS ESTATE  
CO. NO. 647766-V

Signature :

Signature :

Date : 30 April 2019

Date : 6/5/2019

SENIOR MANAGER  
MD RAPI BIN SUMAN

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### SUMMARY OF AUDIT

Recertification Audit 1			
On-site audit date :	6 - 9 April 2015	No. of auditor days :	16 Auditor Days
Audit team :	Valence Shem (LA), Hazani Othman, Jagathesan a/l Suppiah, Dr Zahid Emby		
No. of major NCR :	1	Indicator: 4.8.1	Closing date : 17/4/15
No. of minor NCR :	1	Indicator : 5.3.2	
Indicate the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers
	<b>x</b>		<b>x</b>
	Contract workers	NGOs	Govt. agency
	Indigenous people	Contractor	Others (Please specify)
		<b>X</b>	
Supply base sampled :	Kempas Estate and Serkam Division		

Annual Surveillance Audit 1			
On-site audit date :	21-25 March 2016	No. of auditor days :	14 Auditor Days
Audit team :	Mohd Zulfakar Kamaruzaman (LA) , Hazani Othman, Jagathesan a/l Suppiah, Ismail Ibrahim		
No. of major NCR :	0	Indicator: --	Closing date : -
No. of minor NCR :	3	Indicator : 2.2.2, 4.4.1, 6.2.3	
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers
	<b>x</b>		<b>x</b>
	Contract workers	NGOs	Govt. agency
	Indigenous people	Contractor	Others (Please specify)
		<b>X</b>	
Supply base sampled :	Tangkah Estate and Kemuning Estate		
Changes since the last audit :	No changes.		

Annual Surveillance Audit 2			
On-site audit date :	21-24 February 2017	No. of auditor days :	14 Auditor Days
Audit team :	Mohd Zulfakar Kamaruzaman (LA) , Hazani Othman, Selvasingam T. Kandiah, Rozaimée Ab Rahman		
No. of major NCR :	2	Indicator: 6.1.3 (Recurrence), 4.6.11	Closing date: 23/4/2017
No. of minor NCR :	4	Indicator : 4.1.2, 4.1.3, 4.7.5, 6.2.3	
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers
	<b>X</b>		<b>X</b>
	Contract workers	NGOs	Govt. agency
			<b>X</b>
	Indigenous people	Contractor	Others (Please specify)
		<b>X</b>	
Supply base sampled :	Kempas Estate and Serkam Division		
Changes since the last audit :	No Changes		

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Annual Surveillance Audit 3					
On-site audit date	:	24-27 April 2018	No. of auditor days :	14 Auditor Days	
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Rozaimée Ab Rahman, Rahayu Zulkifli, Selvasingam T. Kandiah.			
No. of major NCR	:	5	Indicator: 1.1.2, 2.1.1, 4.1.2 (Recurrence Issue), 4.7.5 (Recurrence Issue) and 6.5.1.	Closing date: 17/07/2018	
No. of minor NCR	:	3	Indicator: 4.1.3, 6.5.3, 6.10.1		
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees	Settlers	Villagers / Local communities	Suppliers
		√		√	√
		Contract workers	NGOs	Govt. agency	Independent growers
		√			√
		Indigenous people	Contractor	Others (Please specify)	
		NA	√		
Supply base sampled	:	Kemuning Estate and Tangkah Estate			
Justification of audit planning		Total allocation of auditor days for Kempas CU were: Mill = 4 days (3 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Kemuning Estate = 6 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. Tangkah Estate = 6 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.			
Changes since the last audit	:	See notes provided in Table 1 - Summary of Information.			
Report approved by	:	Radziah Mohd Daud	Approval date :	3/08/2018	

Annual Surveillance Audit 4					
On-site audit date	:	22 – 25 January 2019	No. of auditor days :	20	
Audit team	:	Mohd Razman Salim, Mohd Zulfakar Kamaruzaman, Amir Bahari, Hazani Othman & Selvasingam T Kandiah			
No. of major NCR	:	3	Indicator: 4.4.2 & 4.7.3	Closing date : 15/4/2019	
No. of minor NCR	:	4	Indicator : 2.1.2, 5.6.3, 6.1.4 & 8.1.1 (b)		
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	Contractors	Others (Please specify)	
		√	√		
Supply base sampled	:	Kempas Estate, Kemuning Estate and Tangkah Estate			
Justification of audit planning		Total allocation of auditor days for Kempas CU were: Mill = 4 days (1 day for social, 1 day for supply chain certification systems and 2 days for safety and health, environment, mill best practices, GHG verification, TBP, Partial Certification) Kempas Estate = 5 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. Kemuning Estate = 6 1/2 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG			

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	verification plus the verification of Land History and Land Title. Required more mandays than other sites due to location of the divisions far from main division. Tangkah Estate = 4 1/2 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.	
Changes since the last audit :	For ASA4, Serkam Division was excluded from Kempas SOU supply base.	
Report approved by :	Radziah Mohd Daud	Approval date : 30/04/2019

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## SUMMARY OF INFORMATION

### TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period		March 2016 – February 2017	March 2017 – January 2018	Apr 2018 – March 2019	April 2019 – March 2020
Certified FFB Processed (MT)		218,324.81	210,390.42	233,492.51	206,341.44
Production of Certified CPO (MT)		44,739.48	54,951.58	48,473.03	42,506.33
Production of Certified PK (MT)		10,908.89	13,837.38	12,343.64	10,729.75
Certified Areas (Ha)		10,712.55	10,712.55	*10,798.57	***9,888.57
Planted Area (Ha) (Mature + Immature)		10,358.17	10,358.17	**10,323.54	****9,438.13
Production Area (Ha) (Planted – Immature)		8,898.32	9,311.73	9,378.13	8,767.08
HCV Areas		47.79	47.79	47.79	47.79
REMARKS	<p><u>ASA3 i.e. Apr 2018 – March 2019 :</u>                      *The Certified Area has been revised as the corrected figure was consistent with Kempas SOU Land Title.                      **The Planted area decreased at 34.95 ha due to land acquisition by the Government for road construction (1.27 ha) and the rest (33.68 ha) was due to Sime Darby's Special Project.</p> <p><u>ASA4 i.e. Apr 2019 – March 2020 :</u>                      ***Serkam Division i.e. 910 Ha was excluded from Kempas SOU supply base.                      ****Land acquisition at Kemuning Estate approximately at 5.45 Ha.</p>				

### TABLE 2

	CPO	PK
Last years certified volume (MT)	*58,426.22	*15,967.13
Last years actual certified sold (MT)	15,089.82	4,603.03
Last years actual sold under other schemes (MT)	-	-
Last years sold conventional (MT)	26,077.09	6,873.68
New year certified volume (MT)	42,506.33	10,729.75

\*Refer to extension of volume for CPO & PK i.e. certified volume revised to 58,426.22 MT and 15,967.13MT, respectively. RSPO EB has approved the application on 22/01/2019.

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### 1.0 AUDIT PROCESS

#### 1.1 Certification Body

SIRIM QAS International Sdn. Bhd. is the leading certification, inspection and testing body in Malaysia. SIRIM QAS International provides a comprehensive range of certification, inspection and testing services which are carried out in accordance with internationally and nationally recognized 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. Razman Salim	Lead Auditor / Social & Biodiversity	Possessed B.Sc. Forestry (Hons) from Universiti Putra Malaysia with more than 6 years of working experience in the Forest Management, forest, HCVF and ecology.
Amir Bahari	Auditor / Safety	Possessed B. Sc (Hons) Chemistry from Universiti Sains Malaysia 1985. He has been in the Plantations Industry for 30 years having served Palm Oil Mills and Oil Palm Estates. He was involved in the auditing line since 2014 with experience in GAP, Mill Best Practices, RSPO, and Environmental & Occupational Health and Safety.
Hazani Othman	Auditor / Environment	Holds a Bachelor of Forestry Science and Diploma in Forestry, from the Universiti Putra Malaysia. He is a Lead auditor for ISO 14001, FSC & MTCC FMC and CoC and RSPO P&C.
Selvasingam T Kandiah	Auditor / GAP, Health & Safety related to plantation	Holds a B. Sc. (Hons) in Agriculture, he had work as a planter with Kumpulan Guthrie Berhad for more than 10 years including one year in Liberia and 2 years in Estate Department in Guthrie Headquarters.
Mohd. Zulfakar Kamaruzaman	Supply Chain & Social	Holds a B.Sc. Forestry. He had several years of working experience in the oil palm operation. He is a qualified RSPO P&C and RSPO Supply Chain Lead Auditor.

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### 1.3 Audit methodology

The audit covered the Kempas palm oil mill and all three (3) of its supply base. The supply base covered during the audit are Kempas Estate, Kemuning Estate and Tangkah Estate. The audit included an on-site audit to the estates, mill, linesite, local communities, contractors and suppliers to verify the implementation of the requirement of the RSPO certification system. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

### 1.4 Stakeholder Consultation

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

### 1.5 Audit plan:

Refer to Attachment 2.

### 1.6 Date of next audit:

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

## 2.0 SCOPE OF CERTIFICATION AUDIT

### 2.1 Description of the certification unit

The Kempas Certification Unit (Kempas CU) is one of the Strategic Operating Unit (SOU) of Sime Darby Plantation Sdn. Bhd. (SDPSB). The CU is also known as SOU 17 and was initially certified to the RSPO P&C by SIRIM QAS International Sdn Bhd in 2015.

The Kempas CU comprises of the Kempas Palm Oil Mill (Kempas POM) and three (3) supply base i.e. Kempas Estate, Kemuning Estate and Tangkah Estate. All the estates are owned by SDPSB. The Kempas POM has a mill capacity of 60 mt/hr. All the estates have been fully developed before 2005, hence Principle 7 of the RSPO P&C is therefore not applicable.



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

The FFB is sourced from company owned estates that were certified and small holders and small growers surrounding the Kempas CU.

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 period from April 2018 to March 2019

Estate	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Kempas	88,698.46	43.50%	SIRIM
Kemuning	48,642.98	23.76%	SIRIM
Serkam	20,745.77	10.20%	SIRIM
Tangkah	33,771.97	16.46%	SIRIM
Bukit Asahan	4,418.90	2.20%	BSI
Diamond Jubilee	5,164.12	2.56%	BSI
Sg Bahru	1,092.27	0.54%	Control Union
Kok Foh	842.12	0.42%	Mutu Agung
Pertang	67.77	0.03%	Mutu Agung
Sg Sabaling	84.45	0.04%	Mutu Agung
St Helier	315.93	0.16%	Mutu Agung
Bukit Pilah	275.45	0.14%	Mutu Agung
<b>Total</b>	<b>204,120.19</b>	<b>100.00%</b>	<b>-</b>
<b>Third parties</b>			
Eng Huat Latex	98,851.55	89.01%	-
Pertanian Pemajuan Sdn Bhd, Melaka	12,281.53	10.99%	-
<b>Total</b>	<b>111,133.08</b>	<b>100.00%</b>	<b>-</b>
<b>Grand Total</b>	<b>315,253.27</b>		

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**Table 2:** Projected FFB production by the supply base for the next reporting period April 2019 to March 2020

Estates	FFB Contribution	
	Tonnes	Percentage (%)
Kempas	85,346.93	41.36
Kemuning	59,718.51	28.90
Tangkah	61,276.00	29.70
<b>Total</b>	<b>206,341.44</b>	<b>-</b>
<b>Other Supply Bases (Non-Certified)</b>		
Third party suppliers	55,500.00	100
<b>Total</b>	<b>55,500.00</b>	<b>-</b>
<b>Grand Total</b>	<b>261,841.44</b>	<b>100</b>

**Table 3:** Actual FFB received and CPO & PK dispatch by the Kempas POM for the last reporting period (April 2018 to March 2019)

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	315,253.27
FFB Processed	315,253.27
Certified FFB Processed	202,120.19
Non-certified FFB Processed	111,133.08
Crude Palm Oil (CPO)	
Overall CPO Production	63,526.63
Certified CPO Production	41,166.91
Certified CPO delivered as RSPO	15,089.82
Certified CPO delivered as non-RSPO	26,077.09
Certified CPO delivered under other sustainable schemes	-
Palm Kernel (PK)	
Overall PK Production	17,709.54
Certified PK Production	11,476.71
Certified PK delivered as RSPO	4,603.03
Certified PK delivered as non-RSPO	6,873.68
Certified CPO delivered under other sustainable schemes	-

**Table 4:** Projected FFB received and CPO & PK dispatch by Kempas POM of next reporting period (April 2019 to March 2020)

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	261,841.44
FFB Processed	261,841.44
Certified FFB Processed	206,341.44
Non-certified FFB Processed	55,500.00
Crude Palm Oil (CPO)	
Overall CPO Production	53,939.34
Certified CPO Production	42,506.33
Certified CPO delivered as RSPO	42,506.33
Certified CPO delivered as non-RSPO	-
Certified CPO delivered under other sustainable schemes	-
Palm Kernel (PK)	
Overall PK Production	13,615.75

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Certified PK Production	10,729.75
Certified PK delivered as RSPO	10,729.75
Certified PK delivered as non-RSPO	-

Table 5: Planted and certified area of the Kempas CU

Estate	Planted (ha)	Certified (ha)
Kempas Estate	4405.73	4589.50
Kemuning Estate	*2535.45	2618.09
Tangkah Estate	2496.20	2680.98
<b>Total</b>	<b>9438.13</b>	<b>9888.57</b>

\* Land acquisition at Kemuning Estate approximately 5.45 Ha.

Table 6: Planting profile for Kempas Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1991	1 <sup>st</sup> cycle	Mature	111.05	2.52%
1992	1 <sup>st</sup> cycle	Mature	458.92	10.42%
1993	1 <sup>st</sup> cycle	Mature	195.89	4.45%%
1994	1 <sup>st</sup> cycle	Mature	720.15	16.35%
1995	1 <sup>st</sup> cycle	Mature	650.8	14.77%
1998	1 <sup>st</sup> cycle	Mature	81.51	1.85%
2000	2 <sup>nd</sup> cycle	Mature	289.57	6.57%
2001	2 <sup>nd</sup> cycle	Mature	44.47	1.01%
2003	2 <sup>nd</sup> cycle	Mature	40.18	0.91%
2005	2 <sup>nd</sup> cycle	Mature	8.60	0.20%
2006	2 <sup>nd</sup> cycle	Mature	22.00	0.50%
2009	2 <sup>nd</sup> cycle	Mature	57.09	1.30%
2011	2 <sup>nd</sup> cycle	Mature	199.36	4.53%
2013	2 <sup>nd</sup> cycle	Mature	158.77	3.60%
2014	2 <sup>nd</sup> cycle	Mature	231.11	5.25%
2016	2 <sup>nd</sup> cycle	Mature	312.46	7.09%
2017	2 <sup>nd</sup> cycle	Immature	322.19	7.31%
2018	2 <sup>nd</sup> cycle	Immature	66.49	1.51%
2019	2 <sup>nd</sup> cycle	Immature	200.89	4.56%
<b>Total</b>			<b>4405.73</b>	<b>100.00</b>

Table 7: Planting profile for Tangkah Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2000	2 <sup>nd</sup> cycle	Mature	186.85	7.49
2009	2 <sup>nd</sup> cycle	Mature	294.59	11.80
2002	2 <sup>nd</sup> cycle	Mature	198.21	7.94
2005	2 <sup>nd</sup> cycle	Mature	156.72	6.28
2008	2 <sup>nd</sup> cycle	Mature	64.52	2.58
1997	1 <sup>st</sup> cycle	Mature	303.02	12.14
1999	1 <sup>st</sup> cycle	Mature	43.55	1.74
2006	2 <sup>nd</sup> cycle	Mature	250.35	10.03

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2008	2 <sup>nd</sup> cycle	Mature	153.97	6.17
2001	2 <sup>nd</sup> cycle	Mature	399.54	16.01
2007	2 <sup>nd</sup> cycle	Mature	38.98	1.56
1995	1 <sup>st</sup> cycle	Mature	50.10	2.01
1998	1 <sup>st</sup> cycle	Mature	23.37	0.94
2010	2 <sup>nd</sup> cycle	Mature	94.71	3.79
2011	2 <sup>nd</sup> cycle	Mature	78.98	3.16
2012	2 <sup>nd</sup> cycle	Mature	71.11	2.85
2013	2 <sup>nd</sup> cycle	Mature	87.63	3.51
Total			2496.2	100

Table 8: Planting profile for Kemuning Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1995	1 <sup>st</sup> cycle	Mature	3.9	0.15%
1999	1 <sup>st</sup> cycle	Mature	189.91	7.49%
2000	2 <sup>nd</sup> cycle	Mature	554.96	21.89%
2001	2 <sup>nd</sup> cycle	Mature	213.72	8.43%
2002	2 <sup>nd</sup> cycle	Mature	302.1	11.92%
2005	2 <sup>nd</sup> cycle	Mature	137.4	5.42%
2006	2 <sup>nd</sup> cycle	Mature	68.3	2.69%
2007	2 <sup>nd</sup> cycle	Mature	158.5	6.25%
2008	2 <sup>nd</sup> cycle	Mature	43.6	1.72%
2009	2 <sup>nd</sup> cycle	Mature	117.7	4.64%
2010	2 <sup>nd</sup> cycle	Mature	221.73	8.75%
2011	2 <sup>nd</sup> cycle	Mature	54.3	2.14%
2012	2 <sup>nd</sup> cycle	Mature	49.4	1.95%
2013	2 <sup>nd</sup> cycle	Mature	166.1	6.55%
2014	2 <sup>nd</sup> cycle	Mature	113	4.46%
2015	2 <sup>nd</sup> cycle	Mature	60.1	2.37%
2017	2 <sup>nd</sup> cycle	Immature	80.73	3.18%
Total			2535.45	100.00

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### 2.3 Organizational Information/Contact Person

The details of the contact person is as shown below:

Name	:	Mr Suhaimi bin Abu Bakar
Position	:	Senior Manager, Kempas Estate
Address	:	Ladang Kempas, KB 1710, 77000 Jasin, Melaka Malaysia
Phone no.	:	+606 263 1305
Fax no.	:	+606 263 5260
Email	:	<a href="mailto:Suhaimi.abu.bakar@simedarby.com">Suhaimi.abu.bakar@simedarby.com</a>

### 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 NA

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

N/A

## RSPO PUBLIC SUMMARY REPORT

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

No

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)

No significant complaints from stakeholders were observed.

### 4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s)  
(details refer to Attachment 4)                      List : 4                      MZK 01 2019, MRS 01 2019, HO1 & HO2

Total no. of major NCR(s)  
(details refer to Attachment 4)                      List : 2                      STK 01 2019 & STK 02 2019

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

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

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

### 5.0 AUDIT CONCLUSION

The audit team concludes that the organization has 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.

## RSPO PUBLIC SUMMARY REPORT

### 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) which have not been satisfactorily closed out within 90 days of the audit. Recommended for suspension of the certificate.

*Note: Major NCRs which are not addressed within a further 90 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 RAZMAN SALIM                    

(Name)



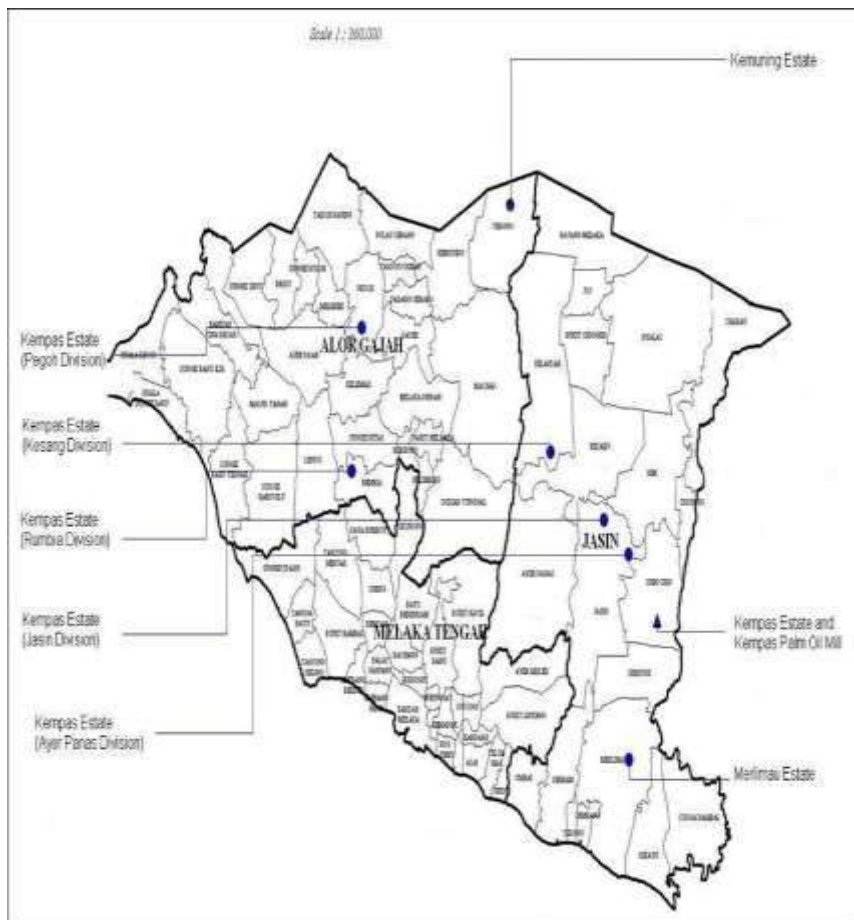
(Signature)

                    15/4/2019                    

(Date)

# RSPO PUBLIC SUMMARY REPORT

## Map of SOU Kempas Attachment 1

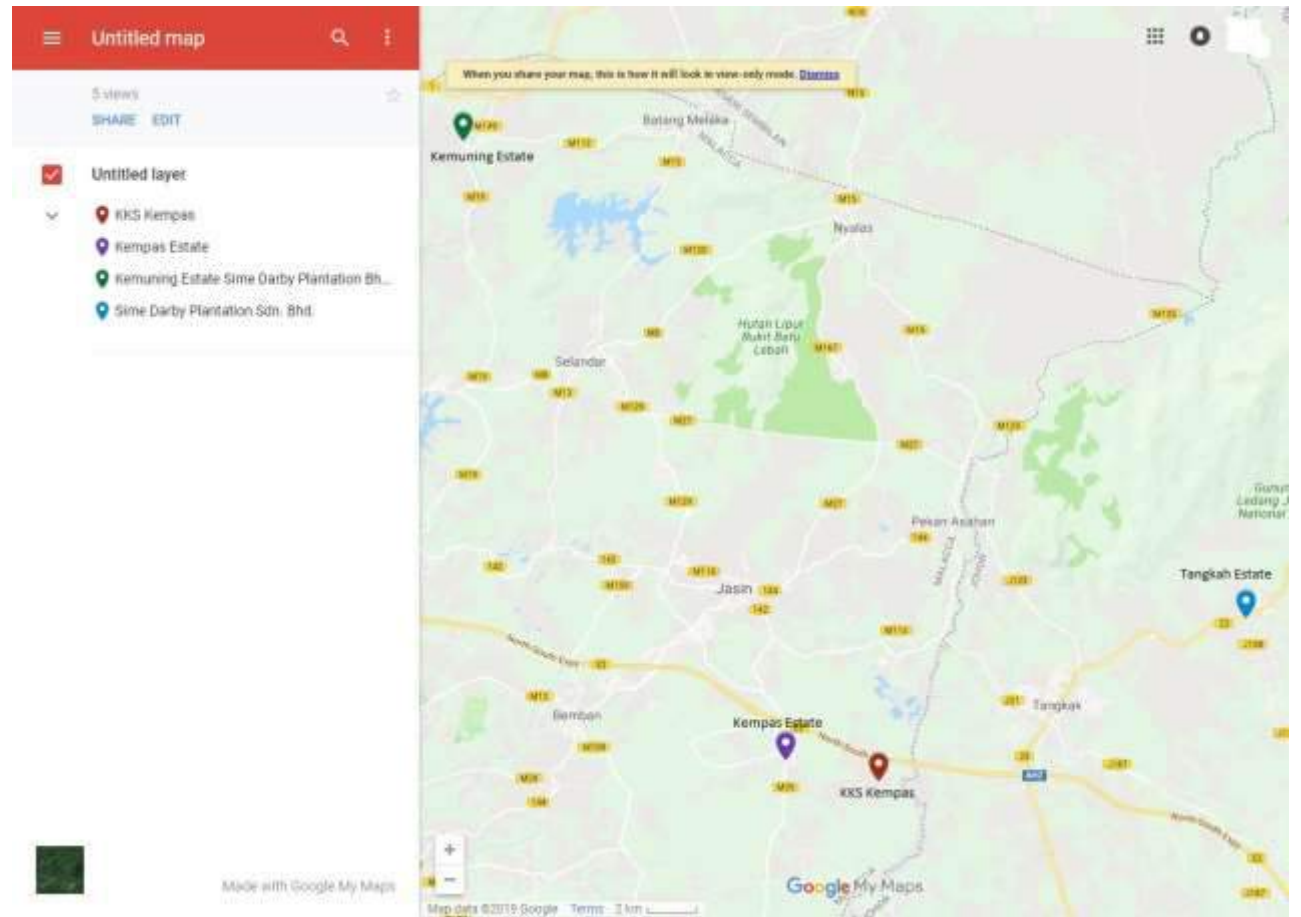






# RSPO PUBLIC SUMMARY REPORT

## Map of Tangkah Estate



# RSPO PUBLIC SUMMARY REPORT

Attachment 2

## RSPO SURVEILLANCE AUDIT PLAN

### 1. Objectives

The objectives of the assessment are as follows:

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

2. **Date of assessment** : 22-25 January 2019

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

- Kempas Palm Oil Mill
- Kempas Estate
- Kemuning Estate
- Tangkah Estate

### 4. Reference Standard:

- a. RSPO P&C MYNI:2014
- b. RSPO Certification Systems June 2007
- c. RSPO Supply Chain Standard, November 2014 (revised June 2017)
- d. Company's audit criteria including Company's Manual/Procedures

### 5. Assessment Team

Assessor: Mohd Razman Salim  
Mohd Zulfakar Kamaruzaman  
Amir Bahari  
Hazani Othman  
Selvasingam T. Kandiah

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

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### 7. Audit Method

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

### 8. Audit Findings

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

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

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

### 9. Confidentiality Requirements

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

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

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

### 11. Reporting

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

### 12. Facilities Required

- a. Room for discussion
- b. Relevant document and record
- c. Personnel protective equipment if required

## RSPO PUBLIC SUMMARY REPORT

- d. Photocopy facilities
- e. A guide for each group

### 13. Assessment Programme Details :

Date / Time	Coverage of assessment / Activity / Site	Razman	Zulfakar	Amir	Hazani	Selva
<b>Day 1: 22 January 2019 (Tuesday)</b>						
8.30am – 9.15am	<p>Opening Meeting – Venue: <b>Eco-Resort (Kempas Estate)</b></p> <ul style="list-style-type: none"> <li>• Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes</li> <li>• Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases , Time bound plan, actions taken to address previous audit findings.</li> </ul>					
9.15am – 1.00pm	<p><b>Site observation to Kempas POM</b>  <b>RSPO Supply Chain 2014</b></p> <ul style="list-style-type: none"> <li>• RSPO Supply chain standard implementation including model requirements</li> </ul> <p><b>P1, P2, P4, P6, P7, P8</b></p> <ul style="list-style-type: none"> <li>• Confirmation of time bound plan &amp; review of partial certification</li> <li>• Land titles user rights</li> <li>• Social aspects - SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the CU</li> <li>• Interview with gender committee, safety committee, workers, contractors, supplier, etc.</li> </ul>					
	<p><b>Site observation to Kemuning Estate</b>  <b>P1, P2, P4, P5, P7, P8</b></p> <ul style="list-style-type: none"> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• Occupational safety &amp; health aspects</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> </ul>					

## RSPO PUBLIC SUMMARY REPORT

	<b>Site observation to Kempas Estate</b> <b>P1, P2, P3, P4, P7, P8</b> <ul style="list-style-type: none"> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM,</li> <li>• New planting</li> <li>• Interview with workers, contractors etc.</li> </ul>					
1.00pm – 2.00pm	Lunch Break					
2.00pm – 5.00pm	Continue assessment at respective sites					
<b>Day 2: 23 January 2019 (Wednesday)</b>						
8.30am – 1.00pm	<b>Site observation to Kempas Estate</b> <b>P1, P2, P4, P6, P7, P8</b> <ul style="list-style-type: none"> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, workers, contractors, supplier, etc.</li> <li>• Land titles user rights</li> </ul>					
	<b>Site observation to Kempas POM</b> <b>P1, P2, P4, P5, P7, P8</b> <ul style="list-style-type: none"> <li>• Occupational safety &amp; health aspects</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> </ul>					
	<b>Site observation to Kemuning Estate</b> <b>P1, P2, P3, P4, P7, P8</b> <ul style="list-style-type: none"> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM,</li> <li>• New planting</li> <li>• Interview with workers, contractors etc.</li> </ul>					
1.00pm – 2.00pm	Lunch Break					
2.00pm – 5.00pm	Continue assessment at respective sites					
<b>Day 3: 24 January 2019 (Thursday)</b>						

## RSPO PUBLIC SUMMARY REPORT

8.30am – 1.00pm	<p><b>Site observation to Kemuning Estate P1, P2, P3, P4, P5, P6, P7, P8</b></p> <ul style="list-style-type: none"> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, workers, contractors, supplier, etc.</li> <li>• Land titles user rights</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting</li> </ul>					
	<p><b>Site observation to Kempas Estate - P1, P2, P3, P4, P5, P6, P7, P8</b></p> <ul style="list-style-type: none"> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• Occupational safety &amp; health aspects</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> </ul>					
1.00pm – 2.00pm	Lunch Break					
2.00pm – 5.00pm	<p><b>Site observation to Tangkah Estate - P1, P2, P3, P4, P6, P7, P8</b></p> <ul style="list-style-type: none"> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, workers, contractors, supplier, etc.</li> <li>• Land titles user rights</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting</li> </ul>					
<b>Day 4: 25 January 2019 (Friday)</b>						
8.30am – 12.30pm	<p><b>Site observation to Kemuning Estate - P1, P2, P4, P6, P7, P8</b></p> <ul style="list-style-type: none"> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, workers, contractors, supplier, etc.</li> <li>• Land titles user rights</li> </ul>					
	<p><b>Site observation to Tangkah Estate - P1, P2, P3, P4, P5, P7, P8</b></p> <ul style="list-style-type: none"> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting</li> <li>• Interview with workers, contractors etc.</li> </ul>					

## RSPO PUBLIC SUMMARY REPORT

	<ul style="list-style-type: none"> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• Occupational safety &amp; health aspects</li> <li>• Environmental management, waste &amp; chemical management</li> </ul>					
12.30pm – 2.30pm	Lunch Break					
2.30pm – 4.00pm	<ul style="list-style-type: none"> <li>• Verification on outstanding issues</li> <li>• Audit team discussion, preparation on audit findings and issuance of nonconformity report (if any)</li> </ul>					
4.00pm - 5.00pm	<ul style="list-style-type: none"> <li>• Closing meeting – venue at <b>Merlimau Training Center</b></li> <li>• Presentation of audit findings.</li> </ul>					



## 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	<p>Kempas SOU had continued to implement the communication procedure as had been described and established for estates and mill. At the point of audit, there was no request for information from the stakeholders received by the CU. The CU also has established mechanism to channel such queries through regular meetings with workers. Various issues and complaints were heard by the management and decisions made for subsequent action.</p> <p>In addition to those, SDP continued to use the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances were available at SDP website at <a href="http://plantation.simedarby.com">http://plantation.simedarby.com</a>. The procedure for responding to any communication is outlined in clause 5.5 of appendix 5.5.3.2 of their Standard Operation Manual of Estate Quality Management System documents. The flow chart of the procedure was made available on notice boards in the Estate office and Muster Grounds.</p>
	1.1.2	Records of requests for information and responses shall be maintained.  Major Compliance	YES	The estates have identified personnel responsible for handling of complaints. Records of communication were maintained at the respective offices. The internal communication is recorded in 'Buku aduan pekerja/stakeholder. From the review of these records, it was noted that the communication was mainly on request for repairs of the employee's houses.
C 1.2  Management	1.2.1	Land titles/user rights (Criterion 2.2);	YES	There was no change in the land ownership / user right. Copies of land titles, which indicate the use right were reviewed. Original copies of land titles maintained kept in Head Office.

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<p>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.</p>	Occupational health and safety plans (Criterion 4.7);	YES	The Occupational Health & Safety Plan entitled ' <i>Occupational Safety &amp; Health Plan 2019</i> ' has been established. Indicators set in the plan are being implemented and monitored. SDPSB continued to use website for disseminating public information. Information relating to safety and health plans were available through SDPSB website at <a href="http://plantation.simedarby.com">http://plantation.simedarby.com</a> .
	Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)	YES	Management documents related to environmental plans and impact assessments maintained available. Among the documents were: Environmental Aspect Identification (EAI) and Environmental Impact Evaluation (EIE) registers, Environmental Improvement Plan, Pollution Prevention Plan, Water Management Plan and Waste Management Plan.
	HCV documentation summary (Criteria 5.2 and 7.3);	YES	HCV documentation maintained available.
	Pollution prevention and reduction plans (Criterion 5.6);	YES	Pollution prevention and reduction plan continued made available in Environmental Improvement Plan and Pollution Prevention Plan.
	Details of complaints and grievances (Criterion 6.3);	YES	Details of complaints and grievances of the SOU 17 Kempas are recorded in the respective grievance and complaints file of the Mill and estates. These books are placed at the respective offices and are publicly available.
	Negotiation procedures (Criterion 6.4);	YES	Negotiation procedure for the SOU 17 Kempas is defined in the "Flowchart and Procedures On Handling Land Dispute". This document was made available and sighted during the audit. As of the date of this audit, no land dispute was observed.
	Continual improvement plans (Criterion 8.1);	YES	Continual improvement plans were available in the Management Review Meeting and Internal Audit Report. The internal audit report identified non-compliances, root causes and correction action plans for continuous improvement. Environmental related continual improvement plans maintained available as stated in Environmental Improvement Plan, Pollution Prevention Plan and Waste Management Plan. However, implementations of continual improvement related to some operations are yet to improve.
	Public summary of certification assessment report;	YES	Public summary for RSPO certification assessment report can be assessed in SIRIM QAS website.
	Human Rights Policy (Criterion 6.13).	YES	SDPB has developed a Social & Humanity Management Policy in Jan 2015. The policy was signed by the SDPB's Managing Director and was displayed on various notice boards at the mill and the estates offices. The policy states among other things, that the business is to be carried out with a sense of humanity, ensuring they are socially beneficial and do not infringe on basic human rights.

## RSPO PUBLIC SUMMARY REPORT

<p>C 1.3</p> <p>Growers and millers commit to ethical conduct in all business operations and transactions.</p>	<p>1.3.1</p>	<p>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.</p> <p>Minor Compliance</p>	<p>YES</p>	<p>Written policy committing to a code of ethical conduct and integrity in all operations and transactions maintained available as observed in "Code of Business Conduct (COBC) booklet, which available in the website <a href="http://www.simedarbyplantation.com/corporate/governance/ethical-business-practices">http://www.simedarbyplantation.com/corporate/governance/ethical-business-practices</a>.</p>
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### **Principle 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS**

Clause	Indicators		Comply Yes/No	Findings
<p>C 2.1</p> <p>There is compliance with all applicable local, national and ratified international laws and regulations.</p>	<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available.</p> <p>Major Compliance</p>	<p>YES</p>	<p>Generally, it was evident that SOU Kempas continued to comply with most of the applicable local, national and ratified international laws and regulations. Relevant licences and permits were verified at SOU Kempas.</p>
	<p>2.1.2</p>	<p>A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance</p>	<p>NO</p>	<p>SOU 17 Kempas have identified, documented and maintained their legal register with written information on legal requirements which related to their operation in legal register entitled "Legal Requirement Register" File 2 (F23) no QSHE/O4/5.2.4. The Sime Darby headquarters, PSQM Department was responsible to track changes and the information was disseminated to all its plantations and mills.</p> <p>The CU observed maintained its documented legal register (Legal Requirement Register, File 2 (F23) no QSHE/O4/5.2.4) which contain written information on legal requirements applicable to the CU operation. No significant change observed related to environmental legal requirement.</p> <p>The legal register at Kempas POM was reviewed on 1/10/17, Kempas Estate on 11/12/2018, Kemuning Estate on 2/1/2019 and Tangkah Estate on 13/1/2019. However, certain applicable legal</p>

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				<p>requirement yet to be updated in the legal register as listed below:</p> <ol style="list-style-type: none"> <li>1. Children and Young Person (Amendment) Act 2010</li> <li>2. Land Acquisition Act (Amendment) 2016</li> </ol> <p>Thus, a Minor NCR MRS 01 2019 was raised.</p>
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	YES	PSQM Department and respective operating unit will collectively undertake the responsibility of identifying, managing, updating and tracking the legal requirements as well as monitoring the status of legal compliance. Evaluation of the legal requirements and its compliance are monitored by each operating unit.
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	YES	PSQM department, which is based in Kuala Lumpur is responsible to track any changes to the Acts and Regulations. This was done through communicating with the publisher of the documents. This mechanism was outlined in its procedure. The updating of the legal register was carried out on a periodical basis. Any change in the legal register was communicated to the respective SOUs.
<p>C 2.2</p> <p>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</p>	2.2.1	Documents showing legal ownership or lease, history of land tenure (confirmation from community leaders based on history of customary land tenure, recognised NCR land) and the actual legal use of the land shall be available. Major Compliance	YES	Evidence of legal ownership of the land including history of land tenure was verified during this audit. For Tangkah Estate the land was previously owned by The Kundong Rubber Estate Limited, Tangkah Rubber Estate Limited and The Kundong Tanjong Pau Limited. The land was acquired during the merger between Golden Hope, Kumpulan Guthrie Berhad and Sime Darby in 2007. The Land Title was then transferred under the name of Sime Darby Plantation Berhad. While Kemuning Estate was originated from Sime Darby which was bought from Negeri Sembilan State Government. For Kempas Estate and Mill, was originated from Sime Darby which was bought from Melaka State Government. Each estate had legal use of the land through an Ownership signed by the Sultan of Johore and Director of Lands and Surveys of Negeri Sembilan and Melaka following the payment of premium and Land fee.
	2.2.2	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and reserves. Minor Compliance	YES	Boundary stones / markers along the legal boundaries observed visibly maintained by the CU. Auditor has verified the boundary stone and pegs at Kempas Estate, Tangkah Estate and Kemuning Estate. The boundary pegs were visible along the boundary adjacent to another plantation area. All the physical markers/Boundary stones along the legal boundaries between was visibly available.

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	2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with FPIC .MinorCompliance	YES	As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby since 1980. The audit team had confirmed that there were no land issues related to previous owners.
	2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes are implemented and accepted by the parties involved.  Major Compliance	YES	As reported in 2.2.1 of this checklist, it has been verified that the land is legitimately owned by Sime Darby since 1980. Hence, there is no land conflict anticipated and no need for acceptable conflict resolution processes.
	2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties. Minor Compliance	YES	As reported in 2.2.1, it has been verified that there is no conflict or dispute over the land. Auditor has verified this through NUPW meetings, Stakeholder meetings and JKKP Meetings and interviewed with settlers and other oil palm plantation companies that there was no land conflict between Kempas CU and neighbouring communities.
	2.2.6	To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations.  Major Compliance	YES	As reported in 2.2.1 of this checklist, it has been verified that the land is legitimately owned by Sime Darby since 1980. Hence, there was no land conflict anticipated nor the need to avoid escalation of conflict is required.

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<p>C 2.3</p> <p>Use of the land for oil palm does not diminish the legal,customary or user rights of other users</p> <p>without their free,prior and informed consent.</p>	2.3.1	<p>Maps of an appropriate scale showing the extent of recognised legal, customary or user rights developed thru participatory mapping involving affected parties. Major Compliance</p>	YES	<p>As reported in 2.2.1 of this checklist, Kempas CU has been developed since 1980, after it was bought from the previous land owner; Melaka Government, Negeri Sembilan Government and Johore Government. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office and was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. Hence, there was no need for the establishment of map showing the legal, customary, or user right of other users as required by this indicator.</p>
	2.3.2	<p>Copies of negotiated agreements detailing the process of FPIC shall be available and shall include:</p> <p>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;</p> <p>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;</p> <p>c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities,</p>	YES	<p>As reported in 2.2.1 of this checklist, Kempas CU has been developed since 1980, after it was bought from the previous land owner; Melaka Government, Negeri Sembilan Government and Johore Government. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office and was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.</p>

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		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 information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.  Minor Compliance	YES	As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to Kempas CU.
	2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. Major Compliance	YES	As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to Kempas CU.

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

Clause	Indicators		Comply Yes/No	Findings
C 3.1  There is an implemented	3.1.1	A business or management plan (min 3 yrs) shall be documented that includes, where appropriate, a business case for scheme		Kempas Estate, Kemuning Estate and Tangkah Estate continued to make commitment to long-term economic and financial viability. The annual budget for 2019 and projection of business plan up to 2023 were sighted. The budget provisions cover activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance etc. The budget included projections on yield/ha, and total cost of production per m ton & per ha.

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management plan that aims to achieve long-term economic and financial viability.		smallholders. Major Compliance	YES	
	3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, shall be available. Minor Compliance	YES	The long-range replanting program until 2025 were sighted on all 3 Estates. This program was reviewed once a year and was incorporated in 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	Manuals that are being continued to be used in SOU Kempas are: Plantations Quality Management System Manual, Standard Operating Manual and Procedures, Agriculture Reference Manual, "Guidelines On River Management" manual, Sustainable Plantation Management System Manual, ESH Management System Manual, Occupational Safety and Health Manual, Pictorial Safety Standards, and Security Guidelines.
	4.1.2	A mechanism to check consistent implementation of procedures shall be in place.  Minor Compliance	YES	All three estates, Kempas Estate, Kemuning Estate and Tangkah Estate had monitored good agricultural practice. Monitoring was conducted through the on-site visits, inspections and discussions with relevant personnel and by conducting Assessments and audits such as Internal Audits, PA visits and RSPO Audits.
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate.  Minor Compliance	YES	All three estates, Kempas Estate, Kemuning Estate and Tangkah Estate continued to keep records of monitoring and actions taken for a minimum of 12 months. Monthly Costing and Annual Reports on monitoring of all activities were made available. Among those records sighted at the estates included Work Program Sheets, Field cost books, Bin cards, Harvesting Intervals, Monthly Progress & Report Account, rainfall data, SIME Cards etc. Harvesting standards were monitored using SDSB's Digital



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				Supervision Program.
	4.1.4	The mill shall record the origins of all third-party sourced FFB.  Major Compliance	YES	All certified FFB are from Kempas SOU 17 estates and other SOU from Sime Darby Plantation. The non-certified FFB are from independent FFB suppliers. All delivery documents were verified volumes of FFBs received by the mill either from Sime Darby owned estates or third parties were indicated in all the documents.
C 4.2  Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.	4.2.1	There shall be evidence that good agriculture practices, as contained in SOPs, are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible.  Minor Compliance	YES	All three Estates, Kempas Estate, Kemuning Estate and Tangkah Estate continued the practice of long-term maintenance of soil fertility by annual application of fertilisers based on periodic foliar and soil analysis, biomass retention and some EFB and compost application. Fertiliser application, which was of paramount importance for maintenance of soil fertility, was carried out based on recommendations made by the Principal Agronomist, Plant Nutrition & Protection, Central West Region, based on Tanah Merah Estate. Annual fertiliser recommendations were made based on annual foliar sampling and 5 yearly soil sampling.
	4.2.2	Records of fertiliser inputs shall be maintained.  Minor Compliance	YES	Records of programs and applications of fertilisers were made available to auditors. Fertiliser application program was monitored using records like program sheets, bin cards, Field Cost book and Manuring Checklist. Records sighted showed that the total amount of fertilisers applied in 2018 was in line with program.
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	YES	From the reports made by the Agronomist, it was evident that all 3 estates have carried out periodic foliar and soil sampling to monitor changes in nutrient status. Annual foliar sampling carried out and the results formed the basis for the fertiliser recommendations to maintain and to improve soil fertility.
	4.2.4	A nutrient recycling strategy shall be in place, and may include use of EFB, POME, and palm residues. Minor Compliance	YES	All three Estates, Kempas Estate, Kemuning Estate and Tangkah Estate continued to have a nutrient recycling strategy in place.
C 4.3  Practices minimize	4.3.1	Maps of any fragile/marginal soils shall be available.	YES	Soil maps made available showed that there was some peat soils on Kempas Estate and Tangkah Estate.

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and control erosion and degradation of soils.		Major Compliance		
	4.3.2	A management strategy shall be in place for plantings on slopes between 9° and 25° unless specified otherwise by the company's SOP. Minor Compliance	YES	All three Estates of SOU 17, Kempas Estate, Kemuning Estate and Tangkah Estate continued to use the SDPB's management strategy in place for planting on slopes and to minimise and control erosion and degradation of soils. It was observed that practices to minimise and control erosion and degradation of soils was also advocated through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines.
	4.3.3	A road maintenance programme shall be in place.  Minor Compliance	YES	During field visit, it was noted road conditions were fairly well maintained in Kempas Estate, Kemuning Estate and Tangkah Estate. Accessibility were made possible by regular maintenance guided by its road maintenance programmes. The program had been supported by adequate provisions in the budgets. Surface run off water from roads were well directed into fields and drains with well cambered roads, road sided drains and silt pits.
	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	Currently, the management of Kempas Estate and Tangkah Estate was in the process reconfirm the status of their soil. The have wrote to the Research Department. Based on the Soil Maps, there was no Peat Soils on Kemuning Estate.
	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	Pending to the decision by Research Department to carry out soil analysis in the area. However, currently these areas were not due for replanting. And, as for Kemuning Estate, based on the Soil Maps provided, there was no Peat Soils.
	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance	YES	Based on Soil Maps provided, there were no other fragile and problem soils in all three Estates, Kempas Estate, Kemuning Estate and Tangkah Estate.
C 4.4	4.4.1	An implemented water management plan shall be in	YES	Kempas CU maintained its Water Management Plan for year 2018/19 for maintaining the quality and availability of natural water resources. This is made through by practicing efficient water consumption

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Practices maintain the quality and availability of surface and ground water.		place. Minor Compliance		through various methods such as; implementation of rain water harvest, construction of water gate for effective management of collection/main drain, establishment of <i>mucuna bracteata</i> to prevent erosion, side drain at field road to control water. And frond stacking, enhancement of ground vegetation at bare ground area.
	4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones shall be demonstrated.  Major Compliance	NO	Protection of water courses was not complied with. Tangkah Estate Kundong Division – there are 3 natural water ways from which water is flowing out the division in Kampongs but no water analysis have been conducted. Thus the Major NCR STK 02 2019 was issued.
	4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national regulations. Minor Compliance	YES	Palm oil mill effluent maintained treated using pond system and discharged for land application method. Effluent observed appropriately treated and periodically monitored. Requirement for parameter and limit remain 1000mg/l for BOD. Periodical monitoring analysis results, which conducted by external party observed complied with applicable regulation.
	4.4.4	Mill water use per tonne of FFB shall be monitored.  Minor Compliance	YES	The mill observed continued monitored water usage per FFB. Water usage monitored monthly. Records of monthly water usage monitoring for FY 2017/18 were available. Usage of water observed fluctuate.
C 4.5  Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management	4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored.  Major Compliance	YES	All three Estates, Kempas Estate, Kemuning Estate and Tangkah Estate, like all SDPB estates, had in place documented IPM plans. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. The IPM technique for rats includes rearing barn owls ( <i>tyto alba</i> ), bagworm control includes the planting of beneficial plants such as <i>Cassia cobanensis</i> , <i>Antigonan leptopus</i> and <i>Turnera sublata</i> and for rhino beetles was by using pheromone trap. All 3 estates carried out monthly detection and observation of leaf eating pests and rat damage and census. These detection and observations were carried by staff. When damaged/disease was observed, proper census was then carried out. All 3 Estates also carried out Barn Owl population and ganoderma census.

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techniques.	4.5.2	Training of those involved in IPM implementation shall be demonstrated.  Minor Compliance	YES	Trainings relating to IPM implementation were organized mainly at estate level by the executives. A guideline as specified in the Agricultural Reference Manual (ARM) Section 15 Plant Protection This includes beneficial plant and rat baiting management. It has been evident that relevant trainings were carried out in Sept & Nov 2018.
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	It has been carried out in accordance with the established SOP. The use of selective products that are specific to the target pest, weed or disease were demonstrated in the Agricultural Reference Manual. All pesticides used were those officially registered under the Pesticide Act 1974. The CU confined usage to only class III & class IV pesticides.
	4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. Major Compliance	YES	All 3 Estates, Kempas Estate, Kemuning Estate and Tangkah Estate 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 Ai/Ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. Both estates had documented programs for spraying pesticides and for rat baiting.
	4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with IPM plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice.  Major Compliance	YES	As part of the IPM plans, management of all 3 estates had established nectariferous beneficial plants ( <i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Turnera sublata</i> ) nurseries for continuous planting in order to attract natural predators and thus to reduce use of insecticides. The Estates aimed to establish more Barn Owl boxes to ultimately achieve a ratio of 1 box to every 10 Hectares.

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	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), the relevant provision (Section 53A); and in acc. with USECHH Reg (2000). Minor Compliance	YES	All the three estates in the CU confined usage of pesticides which were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000. The review of the chemical register concluded that all pesticides used were of class II, III & class IV. The use of paraquat had been prohibited in all SDP estates.
	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, understood by workers. Major Compliance	YES	Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the product. The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be handled in a safe method. The trade and generic names of the chemicals were made known to the workers through the SDS training. SDS was also displayed at all storage areas as observed during the audit. The training included the safety aspects and usage of PPE when handling with pesticides. Records of training are shown in 4.6.9 and verified. All workers involved in pesticide application were provided with appropriate PPE and replaced when worn-out. PPE issuance & replacement records were verified by the auditors. From interviews conducted with workers and staffs in the field and stores clerks it was established that they had been trained and were aware of safe handling procedures.

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	4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes. Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Reg. Major Compliance	YES	<p>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).</p> <ul style="list-style-type: none"> <li>a) Records of purchase, storage and use were maintained.</li> <li>b) All store buildings were equipped with exhaust fans with the door secured.</li> <li>c) Only authorized personnel are assigned to handle the chemicals.</li> <li>d) All the chemicals were segregated in storage accordingly.</li> </ul> <p>Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Thereafter disposal arrangement will follow accordingly as per procedures.</p>
	4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts.  Minor Compliance	YES	During the audit, it was observed and recorded that Kempas CU had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions.
	4.6.8	Pesticides shall be applied aerially only where there is documented justification.  Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application.  Major Compliance	YES	Aerial application of agrochemicals is not practiced in Kempas CU. This is confirmed through observation during the site visit, estate complex and interview with the employees. Such method is no longer in existence in the estates practices.

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	4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide handling shall be demonstrated or made available.  Minor Compliance	YES	Relevant information on the agrochemical used by estate workers were conveyed, largely via morning muster and the use of Safety Pictorial poster. Training on chemical handling and spraying techniques especially to the sprayers had been conducted. The aim was to disseminate correct information and ensure understanding regarding the usage and hazards of the agrochemicals. Interviewed during the spraying activities and fertiliser application noted that the information were understood by the workers.  The staffs and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained. They understood the hazards involved and how the chemicals should be used in a safe and correct method.
	4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated.  Minor Compliance	YES	The CU maintained proper disposal of wastes generated from it activities / operation. Wastes generally disposed according to the established procedure.
	4.6.11	Specific annual medical surveillance for pesticide operators, documented action to treat related health conditions, shall be demonstrated.  Major Compliance	YES	A CHRA was conduct individually for each estate between 2015 and 2018 by third party assessor. The CHRA report among others described requirement of medical surveillance to be made for the listed category of employees. It was evident that the med surveillances were carried out in accordance with that specified in the CHRA reports.
	4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women  Major Compliance	YES	There was no evidence that pregnant and breast-feeding women sprayers performed spraying activity in Kempas CU. Workers interviewed were aware that pregnant and breast-feeding women are not allowed to handle chemicals. The monitoring of pregnancy and lactating is conducted on monthly basis by the estate MA/HA or from the self-declaration from the employees themselves.
C 4.7	4.7.1	An occupational health and safety policy shall be in place. An	YES	The Group Occupational Safety & Health Management Policy and Plan had been established and implemented. The Policy was signed by the Managing Director of Sime Darby Plantation on January

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<p>An occupational health and safety plan is documented, effectively communicated and implemented.</p>		<p>occupational health and safety plan covering all activities shall be documented &amp; implemented, and its effectiveness monitored.</p> <p>Major Compliance</p>		<p>2015 and displayed prominently on notice boards in English and local language <i>Bahasa Malaysia</i>. The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH Manager from Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees, contractors and visitors. Commitment to be responsibilities of both employer and employees.</p>
<p>The occupational health and safety plan shall cover the following:</p>	<p>4.7.2</p>	<p>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</p>	<p>YES</p>	<p>The Mill/Restates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The HIRARC records, as well as CHRA reports were verified during the assessment. Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were displayed at all work stations in the mill and estates office and workshop. In general, the control measures were appropriate to the identified risks. A person-in-charge at each site were appointed to monitor the implementation of the control measures through the 5S initiative.</p>
	<p>4.7.3</p>	<p>All workers involved in the operation shall be adequately trained in safe working practices. Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>Major Compliance</p>	<p>NO</p>	<p>Training and briefing on the operations were provided for workers to educate them on safe working practices. This is also made to ensure that the applicable precautions are adhered. Training for employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, Mill workers, harvesters, pruners, field workers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be used in a safe manner. Based on the HIRARC carried out at both estates and the mill the PPE types for the various activities were identified and recommended.</p> <p>However, it has been observed in PPE adherence during the field and mill visits. Workers using Zenoah Blowers for circle raking in Field 1993 on Kempas Estate. Workers carrying out spraying in Field 2013B on Kemuning Estate were not using the appropriate PPE.</p> <p>Kempas Estate: Bolt and nuts were missing – Tractor TM55 1 each from the left &amp; right rear wheels and 1 from left wheel of trailer. Tractor TM24 – 2 each from both front wheels.</p> <p>Kemuning Estate: Tractor BKF – Driver’s seat rusty and not well secured to the tractor &amp; hydraulic oil</p>



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				<p>leaking and Tractor BJDD7736 – Diesel fuel leaking.</p> <p>Thus the Major NCR STK 01 2019 was issued.</p>
4.7.4	<p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>Major Compliance</p>	YES		<p>The Estates/Mill Managers were appointed as the Chairman of the ESH committee. The letter of appointment for the Managers signed by the Regional GM was sighted. The Manager subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices. Similar appointment was made for all the estates/mill. All identified Executives were officially given a letter for such an appointment. The estates management conducts regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held by both estates are recorded accordingly. The minutes of meeting randomly were sighted and verified. Workers during the meeting participated in the discussion mainly on housing and safety. All units adopted the agenda as released SQM. This agenda list was sighted and adequate to discuss salient issues relating safety, environmental and health.</p>
4.7.5	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>Minor Compliance</p>	YES		<p>Accident and emergency procedures were available in adherence to the SDPB guidelines on '<i>Crisis Management &amp; Emergency Response</i>' plan. Each estates and mill had procedures emergencies situation as listed below in the table. There was formation of ERP Team &amp; ERP for all the identified incidences. The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SQM and amended to tailor to the domestic differences in the estates and mills. ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training.</p>

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	4.7.6	All workers shall be provided with medical care, and covered by accident insurance.  Minor Compliance	YES	Kempas CU provides medical care to Group Estate workers within estates clinic Medical Assistant. Severe cases are referred to local Klinik Kesihatan and nearby hospital located 20 km for the case of Kemuning Estate. Other estates adopt similar practices. The group insurance for the foreign worker was provided as required under the Workmen Compensation Act 1992. SOCSO coverage is made for the local workers.
	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.  Minor Compliance	YES	Accident statistics are being maintained and periodically reviewed (quarterly basis) during ' <i>Health and Safety</i> ' committee meeting – minutes reviewed. The accident incident records for entire of 2018 were reviewed.
C 4.8  All staff, workers, smallholders and contract workers are appropriately trained.	4.8.1	A formal training prog shall be in place that covers all aspects of the RSPO Principles and Criteria includes regular assessments of training needs and doc of the prog. 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 Kempas SOU 17.
	4.8.2	Records of training for each employee shall be maintained.  Minor Compliance	YES	SOU Kempas had trained their staff, workers and smallholders and records of training were kept in the RSPO training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue.

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

Clause	Indicators	Comply Yes/No	Findings
C 5.1	5.1.1 An environmental impact assessment shall be	YES	SOU Kempas maintained its environmental aspects / impacts register, which contain assessment

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Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.		documented. Major Compliance		of its activities. It has been documented accordingly.
	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	SOU Kempas observed maintained its environmental aspects / impacts register, which contain assessment of its activities. First register, Environmental Aspect Identification (EAI) covers identification form upstream activities such as FFB reception until downstream processes was made available. Second register, Evaluation of Environmental Impact (EIE) evaluate impact of identified environmental aspect for all upstream and downstream activities. Among the significant environmental aspects were:  Mill - emission from operation of boiler, discharge of palm oil mill effluent (POME) of pond operation, disposal of schedule wastes and general wastes, use of water for mill operation  Estate - use of diesel by operation vehicles, use of agrochemicals for upkeep and pest and disease control, disposal of scheduled waste including agrochemicals containers, disposal of general wastes
	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	There was no change of activities / operation or impact observed in the CU that requires changes in current practices. The plans reviewed annually and operational control and monitoring content remain as per existing documents, i.e.: <ul style="list-style-type: none"> <li>(a) Environmental Improvement Plan</li> <li>(b) Pollution Prevention Plan</li> <li>(c) Water Management Plan.</li> <li>(d) Waste Management Plan</li> </ul>
C 5.2  The status of rare, threatened or endangered species	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	YES	SOU Kempas has reviewed their HCV with new assessment conducted in Feb 2014. The new HCV assessment titled is 'HCV Re-Assessment For Strategic Operating Unit (SOU 17 – Kempas) which included both the planted area and relevant wider landscape-level considerations with villages and forest reserved. Based on the HCV assessment report, there were only HCV 4 declare in SOU

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<p>other Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>		considerations. Major Compliance		Kempas. The total area of HCV area for SOU Kempas is 47.79 ha HCV area.
	5.2.2	Where RTE species, or HCVs, are present or are affected by plantation or mill op, appropriate measures that are expected to maintain & enhance them shall be implemented through an action plan. Major Compliance	YES	In records there was no RTE species observed/spotted within the member estates in SOU 17. The HCVs areas were as per the listed in 5.2.1 above. Relevant action plans had been established and implemented as described in the management and monitoring of all the identified possible threat.
	5.2.3	There shall be a prog. to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measure shall be instituted in acc. with company rules & national law if any individual working for the company is found to capture, harm, collect or kill these species. Minor Compliance	YES	There were programs held by the estates/mill to all employees in pertaining to the awareness of HCV areas and RTE species. Interview with the employees concluded that training and briefing made during the ad hoc session and morning muster. This was also emphasized during the training held by SQM programs.
	5.2.4	<p>Where an action plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> <li>• The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>• Outcomes of monitoring shall be fed back into the</li> </ul>	YES	The CU members established a standard monitoring document. Details provided include the following information i.e. Area, Field no and GPS coordinate, Observation, Encroachment /sign of trespassing, Wildlife issues/conflicts/sighting, Pollution /erosion issues, Maintenance of signage / fence. The monitoring being made by the AP during the security rounds in the estate complex. The field staff/Assistant also played a role in providing information during their daily rounds in the fields. Records furnished by the APs were sighted and verified. 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.

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		action plan. Minor Compliance		
	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 are no HCV set-asides with existing rights of local communities as observed and recorded from the interviews with the estates executives.
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 Kempas maintained its documented identified wastes and sources of pollution in Waste Management Plan. The Waste Management Plan among others contains information pertaining to mitigate and control the identified wastes and source of pollution.
	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	YES	Among the identified wastes include empty agrochemical containers including pesticides containers. Empty pesticides containers were triple-rinsed at washing station prior to storage and disposal. Disposal was to a recycle company. Also observed there was a letter from DOE to Sime Darby, which exempted the container as scheduled waste upon has been triple-rinsed. Inventory and disposal documents verified for confirmation of proper management and disposal.
	5.3.3	A waste management & disposal plan to avoid or reduce pollution shall be doc & implemented.  Minor Compliance	YES	Waste management and disposal plan maintained as documented in the Waste Management Plan, which among others contain information to avoid or reduce pollution. The plans were implemented accordingly.
C 5.4 Efficiency of fossil fuel use and the use of renewable energy is	5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.	YES	The CU monitored its fossil fuel usage. The CU also continued implemented its plan for improving and optimise efficiency usage of fossil fuels.

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optimised.		Minor Compliance		
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 ' <i>Guidelines for the Implementation of the ASEAN Policy on Zero Burning</i> ' 2003. Major Compliance	YES	SDPSB has a policy of no open burning. As advocated, both estates practiced Zero burning as evident in the 2017 replants visited on Kemuning Estate. It was evident that all palms were felled, shredded, windrowed and left to decompose. No burning had been carried out. There was no replants at time of visit on Tangkah Estate.
	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 ' <i>Guidelines for the Implementation of the ASEAN Policy on Zero Burning</i> ' 2003.  Minor Compliance	YES	There was no evidence of fire has been used for preparing land for replanting in the 2017 replants in Kemuning Estate. The estates had adhered to the Zero Burning Policy of SDPSB
C 5.6  Preamble  Growers and millers commit to reporting on operational greenhouse gas emissions.  However, it is recognised that these significant emissions	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent.	YES	The CU had and maintained its assessment of polluting activities including gaseous emissions, particulate/soot emissions and effluent. Significant environmental receptors and sources of polluting activities for the estates and mill operations were: <ul style="list-style-type: none"> <li>• Air – Source from operation of boiler (smoke and particulate), vehicle &amp; generator operation (smoke and gases), anaerobic processes (ETP, EFB dumping – GHG emission).</li> <li>• Water – Source from mill cleaning of processing stations (hydrocyclone / claybath /sterilizer condensate/clarification) and boiler blowdown.</li> <li>• Land – Source from generation of solid wastes, including scheduled waste, domestic waste and industrial/process wastes.</li> </ul>

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<p>cannot be monitored completely or measured accurately with current knowledge and methodology. It is also recognized 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</p>	5.6.2	<p>Significant pollutants and GHG emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance</p>	YES	<p>The CU has plans to reduce pollution of emission from boiler and ETP. The plan was determined at company level, i.e. top management and Board level. Currently, the on-going plan was to reduce emission from boiler for compliance to applicable legal by installation of ESP dust collector system and new bigger turbine. This plan just started with preliminary identification for ground works.</p>
	5.6.3	<p>A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.</p> <p>Minor Compliance</p>	NO	<p>Regular reporting on progress of GHG emissions from estate and mill operations for 2018 is yet to evidence. Thus, a Minor NCR HO1 was raised.</p>

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monitored.				
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### 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 Social Impact Assessment was carried in Dec 2013 by the PSQM Unit of the Sime Darby Plantation. The process and findings were duly documented and sighted during the Surveillance Audit. The SIA Report considered access and user rights, economic livelihood, women, health and education facilities for children, subsistence activities, cultural and religious values. It also listed out the findings from the SIA and Action Plan needed.
	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	YES	Based on the records of meetings that were available and sighted, meeting was conduct in Dec 2013. There was evidence that the SIA was done with the participation of the affected parties. Those who participated in the SIA were harvesters, loaders, security personnel, loose fruit collectors, manurers, drivers, store keepers, sprayers, auxiliary police, clerical staff, general workers, teachers from nearby schools, the police, etc.
	6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, monitoring of impacts identified, developed in consultation with the affected parties, doc & timetabled, incl. responsibilities for implementation.  Major Compliance	YES	There was evidence that the reviews of the Action Plan were developed following inputs and feedbacks from affected parties. The inputs were then incorporated into a document with timetables and names of persons in charge.
	6.1.4	The plans shall be reviewed as a minimum once every two years		The SIA which was conducted in Dec 2013 and the reviews were being held by the respective units annually. However, there was no evidence that the Management on Social Impact Assessment



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		and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. Minor Compliance	NO	Plans carried out by Kempas Estate and Tangkah Estate (Ayer Panas Division) took into account the impacts of ongoing replanting activities on affected parties. Thus, a Minor NCR No MZK 01 2019 was raised.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	YES	There was no smallholders scheme at SOU 17 Kempas and therefore this indicator was not relevant.
C 6.2 There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties	6.2.1	Consultation and communication procedures shall be documented. Major Compliance	YES	External and internal communication procedures developed by SDPB for the estates and mill maintained to be followed and available at the audited sites. Consultation and communications procedures for SOU 17 Kempas is documented in the Standard Operating Manual. This document was sighted during the audit. An examination of the records kept in the internal and external communication files found that the estates and mill followed the procedures and manuals developed by the company.
	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	The respective units within SOU 17 Kempas has appointed management officials responsible for consultation and communication with stakeholders. The appointment letters available for review.
	6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from	YES	The CU maintains its List of Stakeholders which comprise of contractors, vendors/ suppliers, local communities representatives, related government agencies (among others SOCSO, Immigration, hospital, schools, etc.) The list of stakeholders were updated between Dec 2018 and Jan 2019.

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		stakeholders, maintained.  Minor Compliance		
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 and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. Major Compliance	YES	The system used by the SOU 17 Kempas in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Procedures for handling Social Issues". The Mill and Estates within SOU 17 each have its own Internal Complaint Book and External Communication Book. The Internal Complaint Book was used for employees to lodge complaint pertaining to their houses. The external book was reviewed and found no complaints against the CU.
	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance	YES	SOU Kempas have developed a complaint form for workers and stakeholders titled 'Borang Aduan Pekerja/Stakeholder' also a 'Buku Aduan'. During this audit, there was no dispute case on Kempas CU. The audit team had also confirmed this through interviews of relevant stakeholders.
C 6.4  Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own	6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. Major Compliance	YES	The CU maintained its documented procedures established by head office for distributing fair compensation. The provisions contained in the Sustainable Plantation Management System document entitled: "Procedures for Handling Boundaries Disputes"; "Procedures For Handling Squatters Dispute" (for land issues or ex-workers who remain in housing complex), Plantation Quality Management System" Flow Chart and Procedures for Handling Land Disputes' and Flow Chart and Procedures for Handling Social Issues'.
	6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this	YES	The CU maintained its documented procedures established by head office for distributing fair compensation. The provisions contained in the Sustainable Plantation Management System document entitled: "Procedures for Handling Boundaries Disputes"; "Procedures For Handling Squatters Dispute" (for land issues or ex-workers who remain in housing complex), Plantation Quality Management System" Flow Chart and Procedures for Handling Land Disputes' and Flow Chart and Procedures for Handling Social Issues'. It can be confirmed that the procedure has consider 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

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representative institutions.		<p>evaluation.</p> <p>This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land.</p> <p>Minor Compliance</p>		<p>versus communal ownership of land.</p>
	6.4.3	<p>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</p>	YES	<p>There is no evidence of compensation paid to affected parties, During this audit, there was no dispute case on Kempas CU. The audit team had also confirmed this through interviews of relevant stakeholders.</p>
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	<p>Documentation of pay and conditions shall be available.</p> <p>Major Compliance</p>	YES	<p>Documentation of pay and conditions are contained in employment contracts (for foreign workers) and letters of appointment (for local workers) and collective union's agreements between MAPA-NUPW and MAPA-AMESU, which meet legal and industry standard. Monthly pay slips also document salary payable every month and these documents were available and sighted during the audit.</p>
	6.5.2	<p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday</p>	YES	<p>Details of payment and conditions of employment are contained in employment agreements and collective union agreements between MAPA-NUPW and MAPA-AMESU. These cover working hours, deductions, overtime, medical, leaves, dismissal, period of notice, etc. There is also evidence that the contracts are prepared in a language understood by workers. For example, contracts with Indonesian workers were prepared in Bahasa, and in bi-lingual (English/Hindi) for Nepali workers.</p>

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		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		In addition, their terms of contracts were also explained to them upon arrival at the estates/mill.  During interviews of workers (both local and foreigners) at the Kempas Mill, Kempas Estate, Kemuning Estate and Tangkah Estate comprising sprayers, pruners, harvesters, they generally understand the contents of the employment agreements. Deductions from workers' salaries are made to pay for advance, temple fund, NUPW membership, and electricity. Letters of consent from the workers for salary deductions were sighted, as well as approval letter from Labour Office.
	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	Housing was provided to all employees of the Kempas Palm Oil Mill, Kempas Estate, Kemuning Estate and Tangkah Estate. Workers interviewed confirmed that the houses and amenities provided were adequate, comfortable and requests for repairs are attended to in a timely manner. Site visits were carried out to the workers' housing, and the houses were observed to be generally of good condition. Treated water is provided for free, whereas electricity is paid according to usage. Among the amenities available include <i>surau</i> , clinic, badminton court, playing field.  Medical treatment can be obtained from the estate clinic which is managed by a Medical Assistant, and a visiting medical officer from Alor Gajah.  Line site inspection was carried out by weekly basis, and in accordance with Section 23(2) Workers' Minimum Standard of Housing and Amenities 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 CU is located within close proximity of the nearest towns, and workers confirmed that they were able to access adequate, sufficient and affordable food easily. In addition, each worker were provided with 5kg of rice every two months. There were also canteens and sundry shops available within the CU itself. Visits to the shops confirm that the goods sold are reasonably priced as prices are displayed clearly.
C 6.6 The employer	6.6.1	A published statement in local languages recognising freedom		Recognition of freedom of association is available in the Sime Darby Plantation Social Policy dated January 2015. The policy states that the company respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. This Social Policy was applicable

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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.		of association shall be available.  Major Compliance	YES	throughout all operating units and was printed and translated in Bahasa Malaysia and displayed on notice boards.
	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented.  Minor Compliance	YES	The National Union Plantation Workers (NUPW) is the union that represents workers of SOU 17 Kempas. Union membership is open to both local and foreign workers. Minutes of meetings were evident.
C 6.7  Children are not employed or exploited.	6.7.1	There shall be documentary evidence that minimum age requirements are met.  Major Compliance	YES	The policy on non-employment of children is contained in the Sime Darby Social Policy dated January 2015. There was no evidence that the estates and the mill employs 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 were ≥ 18 years.
C 6.8  Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.  Major Compliance	YES	The equal opportunities policy is contained within the Sime Darby Social Policy dated January 2015, which states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Social Policy was displayed on notice boards in both Bahasa Malaysia and English.
	6.8.2	Evidence shall be provided that employees and groups including local communities, women, and		Apart from the Social Policy which states that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees. Payment of wages/salaries, provision of housing and access to benefits and amenities

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affiliation, or age, is prohibited.		migrant workers have not been discriminated against.  Major Compliance	YES	is fair based on observation, review of pay checks, contracts of employment, and interviews of staff, local and foreign workers (harvesters, sprayers). Foreign workers are also accorded the same living standards and accommodations as local workers.
	6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.  Minor Compliance	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.
C 6.9  There is no harassment or abuse in the work place, and reproductive rights are protected.	6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	The policy to prevent sexual and other forms of violence is contained in the Sime Darby Social Policy dated January 2015. In addition, awareness on sexual and other forms of harassments were also briefed during Gender Committee meetings held at each Mill and Estates. Training was also given to all levels of the workforce, record sighted.
	6.9.2	A policy to protect the reproductive rights of all, especially of women, implemented and comm to all levels of the workforce.  Major Compliance	YES	The policy to protect reproductive rights of women is contained in the Sime Darby Plantation Gender Policy. In addition, Gender Committees have been established at the Mill and Estate levels to help disseminate awareness on issues relating to reproductive rights. In addition, awareness on reproductive rights are also briefed during Gender Committee meetings held at each Mill and Estates and also Training has been given to all levels of the workforce, sighted record.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented & communicated to all levels of the workforce. Minor	YES	A grievance mechanism which respects anonymity and protects complainants is in place at the CU as per the Sime Darby Gender Committee Handbook. Employees were aware of the avenue and mechanism for lodging complaint.

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		Compliance		
C 6.10  Growers and millers deal fairly and transparently with smallholders and other local businesses.	6.10.1	Current and past prices paid for FFB shall be publicly available.  Minor Compliance	YES	Current and past prices paid for FFB, Jan to Dec 2018, was made available at the mill weighbridge.
	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	Separate interviews were conducted with (1) third party FFB suppliers and contractors. Based on the interviews, it was evident that FFB suppliers and contractors understand the pricing mechanism. The pricing mechanism is stipulated and documented in their respective contracts with the Mill and estate(s).
	6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.  Minor Compliance	YES	Based on interviews conducted with the (1) third party FFB suppliers and (2) contractors, it was evident that both parties understand the contractual agreements they enter into. They also confirm that the agreements are fair, legal and transparent.
	6.10.4	Agreed payments shall be made in a timely manner.  Minor Compliance	YES	All contractors and suppliers interviewed confirmed that even if payments are handled by the Sime Darby headquarters, there is no delay in payments, and the process is smooth and payments are received within one month of the issuance of invoice.
C 6.11  Growers and millers contribute to local Sustainable development where	6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated.	YES	Based on records, interviews and site verification, contributions made to local development were made based on the requests from the local communities.

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appropriate.		Minor Compliance		
	6.11.2	There are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.  Minor Compliance	YES	Since there are no scheme smallholders, thus, this indicator is not applicable.
C 6.12  No forms of forced or trafficked labour are used.	6.12.1	There shall be evidence that no forms of forced or trafficked labour are used.  Major Compliance	YES	Based on interview with workers, field observations, review of the employment contracts, records of wages, overtime payments, there was no evidence of any form of forced or trafficked labour within SOU 17 Kempas. In addition, foreign workers were given the option to either keep their own passports or to handover the passports to Mill/Estates to keep for safekeeping. Those who hand over their passports to the Mill/Estate for safekeeping have signed respective consent letters which were sighted during the audit. Those who voluntarily chose to hand over their passports were informed that they can get back their passports should they need them to travel.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred.  Minor Compliance	YES	Based on interviews with foreign workers at the Mill and plantations, all of them were aware of the types of work they would be doing before they arrived in Malaysia. The actual job undertaken was the same as what they were informed of while they were still in their home country. No contract substitution has therefore occurred.
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented.  Major Compliance	YES	The SOU 17 Kempas adopts the Social Policy 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".
C 6.13	6.13.1	A policy to respect human rights shall be documented and		The policy to respect human rights was documented in the Sime Darby Plantation's Social and Humanity Management Policy. This Policy states among others, that it will develop its businesses



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Growers and millers respect human rights		communicated to all levels of the workforce and operations.  Major Compliance	YES	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 Training and has been given to all levels of the workforce, sighted record.
	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 17 Kempas is located in Peninsular Malaysia and therefore this indicator was not applicable.

### Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

SOU Kempas has no plan for any new planting and new development of area. Auditors has verified through checking the [www.globalforestwatch.com](http://www.globalforestwatch.com), GOOGLE Maps, Estate Maps and also through site visit to the estates area; Kemuning and Tangkah Estate. Based on the audit findings, it was confirmed that there were no new planting or new development of areas at Kempas CU.

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

Clause	Indicators	Comply Yes/No	Findings
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<p>C 8.1</p> <p>Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.</p>	<p>8.1.1</p>	<p>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.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <p>Major Compliance</p>		
	<p>a)</p>	<p>Reduction in use of pesticides(Criterion 4.6);</p>	<p>YES</p>	<p>All estates continued to manage pests, disease and weeds using appropriate IPM techniques. In order to minimize use of insecticides, both estates had established nurseries for beneficial plants mainly Tunera subulata, Cassia cobanensis and Antigonon leptopus. This was to establish continuity in the planting of beneficial plants.</p> <p>In order to reduce the use of rat baits to control rats, Barn Owls was encouraged as indicated by Barn Owl census. Barn Owl boxes were also sighted in the fields. All estates aimed to establish more Barn Owl boxes to ultimately achieve a ratio of 1 box to every 10 hectares.</p> <p>The estates were also committed to reduce using chemicals and now have implemented and will continue to only spray Circles (Strip) and noxious weeds. Soft weeds and Nephrolepis bisserata are planted, maintained and encouraged in the inter rows. Wherever possible, harvester's paths were grass cut.</p> <p>EFB was applied in single layers and is not dumped in large amounts to prevent breeding of Rhinoceros Beetles. To ensure efficient Loose Fruit collection and expedite circle raking to avoid VOPs.</p>
	<p>b)</p>	<p>Environmental impacts (Criteria 4.3, 5.1 and 5.2);</p>	<p>NO</p>	<p>There were operations / situations that required improvement plan to mitigate negative impact to environment.</p> <p>Kemuning Estate: Oil spillage observed outside of workshop; no method to mitigate of potential fall (spill) of stacked chemicals in Chemical Store.</p>

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				<p>Kempas Estate: Oil spillage observed outside of workshop.  Tangkah Estate: Potential of wastewater from vehicle cleaning and workshop floor cleaning flow onto soil ground.  Thus, a Minor NCR HO2 was raised.</p>
c)	Waste reduction (Criterion 5.3);	YES	<p>The CU continued to implement waste reduction activities. Among of reduction activities were:</p> <ul style="list-style-type: none"> <li>• EFBs: used for mulching in the field.</li> <li>• fiber and shell: used as fuel in the boiler.</li> <li>• agrochemical containers: collected by acknowledged recycle company by Department of Agriculture (DOA) for recycling programme.</li> <li>• final effluent: used for field irrigation.</li> <li>• triple-rinsing wastewater:re- used for chemical mixing.</li> </ul>	
d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	YES	<p>The CU continued to implement continual improvement plan to reduce emission. Among the continual improvement plan were:  Installation of:</p> <ul style="list-style-type: none"> <li>• ESP dust collector system</li> <li>• Turbine 1.8 MW in replacement of current unit of 1.2 MW.</li> <li>• installation of 1 additional effluent pond mixer.</li> <li>• use of semi mechanized method for:</li> <li>• fertilizer application <i>Semi-Mech</i> trailer.</li> <li>• spraying – semi mechanized ST 102.</li> </ul>	
e)	Social impacts (Criterion 6.1);	YES	<p>Social impacts were constantly updated based on inputs received from stakeholder consultations/meetings. This was evidenced in the minutes of the following meetings, and the updated Action Plans. These stakeholder meetings include Gender Committee meetings, OSH meetings and meetings with external stakeholders.</p>	
f)	Encourage optimising the yield of the supply base	YES	<p>In order to optimise yields both were committed to implement agricultural practices inclusive of timely and proper fertiliser application, Improve accessibility to maximise crop evacuation, maintaining harvesting interval below 12 days, To collect all loose fruit to minimise losses, Water bodies and water conservation pits were constructed to conserve moisture.  Kempas to introduce semi mechanized method for;</p> <ol style="list-style-type: none"> <li>a) Fertilizer application <i>Semi-Mech</i> trailer</li> <li>b) Spraying – semi mechanized ST 102</li> <li>c) Expansion of area MBS – fertilizer application</li> </ol>	

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d) Cantas – harvesting 2019

### RSPO CERTIFICATIONS SYSTEMS FOR PRINCIPLES & CRITERIA JUNE 2017

Clause	Indicators	Comply Yes/No	Findings
<p>4.5.3 Time-bound plan</p> <p>Note: Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;</p>	<p>(a) As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.</p>	<p>YES</p>	<p>SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.</p> <p><b>Indonesia</b>  <b>PT Mitral Austral Sejahtera</b>            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.  <a href="https://askrspo.force.com/Complaint/s/case/5009000028ErzsAAC/detail">https://askrspo.force.com/Complaint/s/case/5009000028ErzsAAC/detail</a></p> <p><b>PT Bahari Gembira Ria</b>            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 &amp; Report for PT BGR -  <a href="https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioYJEAZ">https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioYJEAZ</a></p> <p><b>PT Sandika Natapalma &amp; PT Budidaya Agro Lestari</b>            Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing.</p>

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			<p>As at June 2017, the smallholders with the total of 29,914 Ha (58% from the total Ha, 51,715 Ha) of associated smallholders in Indonesia has been certified. Certification process for the remaining associated smallholder's areas was on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and out growers by end 2020.</p> <p><b>PT Bersama Sejahtera Sakti</b> 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><b>PT Ladang Rumpun Subu Rubadi</b> SAP 1 Estate PLASMA will be undergone 2<sup>nd</sup> stage audit on 2019.</p> <p><b>PT Guthrie Pecconina</b> Sungai Jernih Estate and the KKPA Estates has undergone audit.</p> <p><b>PT Sime Indo Agro</b> Only East estate not yet certified – land legalization still in progress.</p> <p><b><u>Liberia</u></b> 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 &amp; 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><b><u>Papua New Guinea (NBPOL)</u></b> 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</p>
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				Markham Farms is set to that duration. <a href="https://rspo.org/certification/remediation-and-compensation/racp-tracker">https://rspo.org/certification/remediation-and-compensation/racp-tracker</a> no 82
	(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	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.

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		accordance with RSPO P&C criterion 7.3. Any new plantings since 1 <sup>st</sup> 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;		<a href="https://rspo.org/certification/remediation-and-compensation/racp-tracker">https://rspo.org/certification/remediation-and-compensation/racp-tracker</a> 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. 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. <a href="https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail">https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail</a>
	(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.

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(e)	<p>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:</p>	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"> <li>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;</li> </ul>	YES	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;">#</th> <th style="width: 15%;">Name of SOU</th> <th style="width: 25%;">Name of Units</th> <th style="width: 55%;">Positive assurance statement and self-assessment</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>PT Sime Indo Agro</td> <td>East Sei Mawang</td> <td>Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor</td> </tr> <tr> <td style="text-align: center;">2</td> <td>PT Ladang rumpun Subur abadi</td> <td>Subur Abadi Plasma 1</td> <td>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.</td> </tr> <tr> <td style="text-align: center;">3</td> <td>PT Bersama Sejahtera Sakti</td> <td>KKPA BSS</td> <td>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.</td> </tr> </tbody> </table>	#	Name of SOU	Name of Units	Positive assurance statement and self-assessment	1	PT Sime Indo Agro	East Sei Mawang	Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor	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.
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					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 - <a href="https://rspo.secure.force.com/membership/servlet/Servlet_FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioYJEAZ">https://rspo.secure.force.com/membership/servlet/Servlet_FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioYJEAZ</a> <a href="https://rspo.secure.force.com/membership/servlet/Servlet_FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioXOEAZ">https://rspo.secure.force.com/membership/servlet/Servlet_FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioXOEAZ</a>
			5	PT Guthrie Pecconina Indonesia	Sungai Jernih Estate and GPI KKPA	Sungai Jernih Estate and GPI KKPA were audited by Mutuagung as verified through Recertification Audit report. The assessment was conducted on 15 – 20 May 2017.
			6	PT Mitra Austral Sejahtera (MAS)	MAS 1 MAS 2 MAS 3 Mas Factory Plasma MAS	Internal assessment was conducted on 9 - 10 Nov 2017 by PSQM Indonesia.
			7	PT Sandika Nata Palma	Karya Palma KKPA SNP	Internal assessment was conducted on 10 Feb 2017.
			8	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Sungai Putih (PT BAL) Beturus (PT BAL) KKPA BAL	Internal assessment was conducted on 18 - 23 Sept 2016. This PT also has conducted Stage 1 audit on RSPO Certification System, P&C RSPO (2016) and RSPO Supply Chain Certification Standard on 17 – 22 April 2017.  Smallholder project – targeted for certification by 2020.

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	<ul style="list-style-type: none"> <li>Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.</li> </ul>	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"> <li>Desktop study e.g. web check on relevant complaints</li> </ul>	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"> <li>If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.</li> </ul>	YES	Further information can be obtained from <a href="https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail">https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail</a>
<p>4.6.4</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p>	No additional indicators	YES	As it has been mentioned in 2.2.1 of this checklist, for Tangkah Estate the land was previously owned by The Kundong Rubber Estate Limited, Tangkah Rubber Estate Limited and The Kundong Tanjong Pau Limited. The land was acquired during the merger between Golden Hope, Kumpulan Guthrie Berhad and Sime Darby in 2007. The Land Title was then transferred under the name of Sime Darby Plantation Berhad while Kemuning Estate was originated from Sime Darby which was bought from Negeri Sembilan State Government. For Kempas Estate and Mill, was originated from Sime Darby which was bought from Melaka State Government. Each estate had legal use of the land through an Ownership signed by the Sultan of Johore and Director of Lands and Surveys of Negeri Sembilan and Melaka following the payment of premium and Land fee. Based on this, it has been confirmed that there was no such case concerning the rights of local communities or indigenous people in Kempas SOU.
<p>Note:</p> <ol style="list-style-type: none"> <li>For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&amp;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;</li> <li>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.</li> </ol>			

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Attachment 4

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

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
2.1.2 MRS 01 2019	Minor	<p>Finding : Certain amendment of applicable legal yet to be updated in the legal register.</p> <p>Objective evidence : The legal register at Kempas POM was reviewed on 1/10/17, Kempas Estate on 11/12/2018, Kemuning Estate on 2/1/2019 and Tangkah Estate on 13/1/2019. However, certain applicable legal requirement yet to be updated in the legal register as listed below: 1.Children and Young Person (Amendment) Act 2010 2.Land Acquisition Act (Amendment) 2016</p>	<ul style="list-style-type: none"> <li>i) To approach relevant department for the updates.</li> <li>ii) To include the stated acts in legal register.</li> <li>iii) PIC to update legal register in annual basis.</li> </ul>	<p>Corrective action plan was accepted by assessor.</p> <p><b>Status: Open. Will be verify the implementation and effectiveness during next audit.</b></p>
4.4.2 STK 02 2019	Major	<p>Finding :. Protection of water courses as per SDPB SPMS: Appendix Standard Operating Procedure For Water Quality Monitoring was not complied with.</p> <p>Objective evidence : Tangkah Estate Kundong Division – there are 3 natural water ways from which water is flowing out the division but no water analysis have been conducted.</p>	To conduct briefing on SOP for Water Quality Monitoring for key person responsible for water sampling.	<p>Kundong Division, Tangkah Estate has collected water samples (K1, K2 and K3) in Feb 2019. Pesticide in water analysis and industrial effluent (water) analysis results for Kundong Div. dated in March 2019 received.</p> <p>Training on water and waste water quality monitoring has been conducted in Feb 2019.</p> <p><b>Status: Closed</b></p>
4.7.3 STK 01 2019	Major	<p>Findings:</p> <ol style="list-style-type: none"> <li>1. Not all appropriate protective equipment was used by workers at the place of work.</li> <li>2. Vehicles were not maintained as per Item 7.1.3.3 of SOP 'Transportation System &amp; machinery Safety,</li> </ol>	<ul style="list-style-type: none"> <li>i) Kempas &amp; Kemuning: To enforce PPE utilization at field by issuing warning letter if found no PPE used.</li> <li>ii) Kempas &amp; Kemuning: To fix missing nuts and bolt immediately to the tractors. Tractor Driver was briefed to</li> </ul>	<p>The Kempas Estate has issued PPE for workers using Zenoah blowers in Jan 2019. Training on PPE was conducted in Feb 2019.</p> <p>Bolts and nuts were fixed to the tractor</p>

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		<p>OSH procedure.</p> <p>Objective evidence:</p> <ol style="list-style-type: none"> <li>1. Workers using Zenoah Blowers for circle raking in Field 1993 on Kempas Estate, Workers carrying out spraying in Field 2013B on Kemuning Estate were not using the appropriate PPE.</li> <li>2. (i)Kempas Estate: Bolt and nuts were missing – Tractor TM55 1 each from the left &amp; right rear wheels and 1 from left wheel of trailer. Tractor TM24 – 2 each from both front wheels.</li> <li>(ii)Kemuning Estate: Tractor BKF – Driver's seat rusty and not well secured to the tractor &amp; hydraulic oil leaking and Tractor BJDD7736 – Diesel fuel leaking.</li> </ol>	<p>report any unsafe condition at tractor. Foreman is assigned to conduct daily inspection to tractors.</p>	<p>TM55 and TM24-2 in Feb 2019. Daily inspection to tractors will be recorded in the Service Logbook. The purchase order for replacement of seat tractor were also issued in Feb 2019.</p> <p>Kemuning Estate had carried out daily inspection for both tractors (BKF 8726 &amp; BJD 7736) as verified through daily inspection checklist. Both tractors in good condition.</p> <p><b>Status: Closed</b></p>
5.6.3 HO1	Minor	<p>Finding:</p> <p>The above requirement pertaining regular reporting on progress of GHG emissions from estate and mill operations not conformed.</p> <p>Objective evidence:</p> <p>Regular reporting on progress of GHG emissions from estate and mill operations is yet to evidence.</p>	<ol style="list-style-type: none"> <li>i) To follow up with GSQM on the update of development</li> <li>ii) To ensure timely reporting on GHG emission</li> </ol>	<p>Corrective action plan was accepted by assessor.</p> <p><b>Status: Open. Will be verify the implementation and effectiveness during next audit.</b></p>
6.1.4 MZK 01 2019	Minor	<p>Finding :</p> <p>Impacts of replanting at Kempas Estate (Main Division) and Tangkah Estate (Ayer Panas Division) were not taken into account when reviewing the Social Impact Assessment Plans.</p> <p>Objective evidence:</p> <p>The Social Management Plans carried out by Kempas Estate and Tangkah Estate did not take into account the impacts of ongoing replanting activities on affected parties.</p>	<p>To carry out an assessment with associated harvesters</p> <p>To include the findings and to incorporate in social management plan every two years once</p>	<p>Corrective action plan was accepted by assessor.</p> <p><b>Status: Open. Will be verify the implementation and effectiveness during next audit.</b></p>

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<p>8.1.1 HO2</p>	<p>Minor</p>	<p><b>Finding:</b> There are operations / situations observed require improvement plan to mitigate negative impact to environment.</p> <p><b>Objective evidence:</b> Kemuning Estate: Oil spillage observed outside of workshop; no method to mitigate of potential fall (spill) of stacked chemicals in Chemical Store. Kempas Estate: Oil spillage observed outside of workshop. Tangkah Estate: Potential of wastewater from vehicle cleaning and workshop floor cleaning flow onto soil ground.</p>	<ul style="list-style-type: none"> <li>i. Kemuning: To brief on best practice at workshop &amp; chemical store i.e to place tray/ containment at oil fueling area/at the beneath of parked tractor.</li> <li>ii. Kempas: To brief on best practice while handling with oil fueling i.e to place tray at the beneath of parked tractor</li> <li>iii. Tangkah: To build bund at tractor washing bay to avoid wastewater flow onto soil ground</li> </ul>	<p>Corrective action plan was accepted by assessor.</p> <p><b>Status: Open. Will be verify the implementation and effectiveness during next audit.</b></p>
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## RSPO PUBLIC SUMMARY REPORT

**Attachment 5**

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

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

1. File Reference No.	: ES10170005
2. Name of facility/ site(s) /entity(ies)	: Sime Darby Plantations Berhad – SOU Kempas
3. Site Location (single site/multisite/Group)	: 77000 Jasin, Melaka
4. SC model	: Mass Balance
5. Type of entity	: <del>Mill / Crusher / Refinery / Biodiesel plant / Primary Oleochemical / Secondary Oleochemical / End product manufacturer</del>  <i>For oleochemicals and its derivatives, please check the conversion factor against the "RSPO Rules for Oleochemicals and its Derivatives" dated 1st December 2016</i>
6. RSPO Member Number	: 1-0008-04-000-00
7. Annual summary records of certified oil palm products purchased and claimed	: Projected for last year for period of April 18 until March 19 CPO Projected: 48,473.03 mt (request extension to 58,426.22mt on 18/1/19 approved 22/1/19) PK Projected: 12,343.64 mt (request extension to 15,967.13mt on 18/1/19 approved 22/1/19) (All as at Apr 18-Dec 18) CPO Claim as Mass Balance: 15,089.82 mt CPO Claim as Non-RSPO: 26,077.09 mt PK Claim as Mass Balance: 4,603.03 mt PK Claim as Non-RSPO: 6,873.68 mt

## RSPO PUBLIC SUMMARY REPORT

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

	Requirements	Remarks
	<b>Audit Process Requirements – FOR STAGE 2 / RECERTIFICATION AUDIT</b>	
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.	<b>N/A as this audit is a surveillance audit.</b>
	<b>Audit Process Requirements – SURVEILLANCE AUDIT</b>	
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>Kempas POM had revised their documented procedure title '<i>Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001</i>'. The procedure described the following:</p> <ul style="list-style-type: none"> <li>• Clause 4.0 ~ the responsibility of for the implementation of RSPO SCC i.e. head of operating unit</li> <li>• Clause 5.0 ~ Control of document &amp; records such as weighbridge tickets, consignment note , training record &amp; contracts. Record retention for 10 years. Define the critical control point (CCP) :estate – weighbridge, mill – weighbridge, admin office, ramp, CPO despatch area, CPO storage tank. Kernel silos.</li> <li>• Clause 6.0 ~ Delivery of FFB from the estate – relevant record involved, flowchart for crop diversion, list of mill and their supply chain model i.e. IP or MB</li> <li>• Clause 7.0 ~ Receiving FFB at the mill – list of supply base, rules for determining diverted FFB destination, relevant record</li> <li>• Clause 8.0 ~ process monitoring – for IP model mill need to ensure no mixing of RSPO certified and non-certified</li> <li>• Clause 9.0 ~ CPO and PK despatch – [Clause 9.1] all delivery of CPO and PK shall be in accordance with the contract allocated by Global Trading &amp; Marketing (GTM) department. [Clause 9.2] Outgoing document for CPO and PK 9e.g. contract, weighbridge ticket / despatch note) shall specify the following information which can be either presented in single document or across a range of document Trade name / RSPO IP, RSPO certificate no. : RSPO 0025,</li> <li>• Clause 10.0 ~ Non-conforming material / product – requirement to downgrade the RSPO Product</li> </ul>

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		<ul style="list-style-type: none"> <li>• Clause 11.0 ~ product claim – shall follow RSPO rules on market communication &amp; claim</li> <li>• Clause 12.0 ~ Outsourced contractor - the mill has established list of outsourced contractor. Sighted list of transporter for CPO and PK.</li> <li>• Clause 13.0 ~ Training – the mill shall provide training for relevant personnel carrying the task at tech critical control point (CCP).</li> <li>• Clause 14.0 ~ Reclassification of mill's supply chain model - Reclassification of mill's supply chain model may be determined by GTM/ PSQM. CB shall be notified. All communicated shall be recorded.</li> <li>• Clause 15.0 ~ Production volume</li> <li>• Clause 16.0 ~ Conversion Factors</li> <li>• Clause 17.0 ~ Internal Audit</li> <li>• Clause 18.0 ~ Complaints</li> <li>• Clause 19.0 ~ Management Review</li> </ul> <p>The procedure was kept in file RSPO Supply Chain Manual. Appropriate changes were also made in the change to include the new clause Production volume, Conversion factors, Internal Audit, Complaints and Management Review.</p>
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### SECTION B (ii): GENERAL CHAIN OF CUSTODY REQUIREMENTS FOR THE SUPPLY CHAIN

	Requirements	Remarks
<b>1</b>	<b>Applicability of the general chain of custody requirements for the supply chain</b>	
1.1	Organization takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors.	Kempas 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 Kempas POM is processing facility.
1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform	RSPO Palm Trace details are as followed; Member name: Kempas Oil Mill
1.4	Processing aids do not need to be included within an organization's scope of certification.	No processing aid involved in Kempas POM scope of certification
<b>2</b>	<b>Supply chain model</b>	
2.1	The site can only use the same supply chain model as its supplier or	Kempas POM has aware on the need to downgrading the supply chain model.



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	go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	However, this indicator was not applicable since this POM use MB model.
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Kempas POM decided to maintain the MB model for their supply chain system. Therefore, they are being audited against the general chain of custody requirement for the supply chain as well as Module E of the RSPO Supply Chain Standard.
<b>3</b>	<b>Documented procedures</b>	
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:	Kempas POM had revised their documented procedure title ' <i>Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001</i> ', as provided above. The procedure was kept in file RSPO Supply Chain Manual. Appropriate changes were also made in the change to include the new clause Production volume, Conversion factors, Internal Audit, Complaints and Management Review.
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 Feb 2018. 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).	KPOM only apply RSPO Supply Chain system within their organization. Therefore, records as such purchasing & sales (FFB delivery note, WB advice ticket, FFB grading, Daily FFB received, Delivery notes), production log (CPO & PK production, Daily production report), training, control of non- conformance, complaint etc. were noted to be updated accordingly.
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 Manager have overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Kempas POM. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements.
3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. ii. Effectively implements and maintains the standard requirements within its organization. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct nonconformities shall be subject to management review at least annually. The organization shall be able to maintain the internal audit records and reports.	RSPO internal audit was conducted in Dec 2018 by the internal lead auditors. The internal audit has follow the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There were 4 Major nonconformance reports raised by auditor. The corrective action was successfully close within 14 days as per SOP Audit Attendance sheet, audit plan, audit notes, corrective action was sighted by auditor.

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<b>4</b>	<b>Purchasing and goods in</b>	
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"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment / delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number.</li> </ul> <p>Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products.</p>	<p>KPOM had continued to receive certified FFBs from the CU's own supply bases as well as non-certified FFBs from outsiders. There were three supply bases (estates) sending certified FFBs to KPOM. They were Kempas, Kemuning and Tangkah Estates. Sighted FFB consignment note for Kempas, Kemuning and Tangkah Estates were reviewed. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight.</p>
a)	<p>The site shall have documentation that demonstrate that purchases are made to the material category agreed with their supplier (IP, SG or MB).</p>	<p>KPOM had continued to receive certified FFBs from the CU's own supply bases as well as non-certified FFBs from outsiders. There were three supply bases (estates) sending certified FFBs to KPOM. They were Kempas, Kemuning and Tangkah Estates. For non-certified FFBs, KPOM had sourced them from Two FFB collectors. Documentation reviewed. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight.</p>
b)	<p>The site ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcement and Shipping Confirmation on the RSPO IT platform on the level of each shipment.</p>	<p>Kempas POM has registered in IT platform RSPO Palm Trace details are as followed; Member name: Kempas Oil Mill</p>
c)	<p>A check of the validity of the Supply Chain Certification of suppliers for all sites that are SC certified. This shall be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcement.</p>	<p>The validity of the certificate of the supplier has been checked accordingly.</p>
4.2	<p>The site shall have a mechanism in place for handling non-</p>	<p>KPOM had started implementing the electronic system 'Simweigh' to trace the volume</p>

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	conforming material and/or documents.	<p>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 KPOM, 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.</p> <p>On processing, KPOM still referred to the sales contract issued by the Headquarters office for production planning (Refer 8.0 of the SOP – Process Monitoring). As KPOM had continued to implement the MB model for its supply chain system, both RSPO and non-RSPO FFBs were being processed together in the same production line.</p>
<b>5</b>	<b>Outsourcing activities</b>	
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>There are 1 outsource company CPO transporter. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training was sighted.</p>
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"> <li>a) The site has legal ownership of all input material to be included in outsourced processes;</li> <li>b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The responsibility is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</li> </ol>	<ol style="list-style-type: none"> <li>a) 1 outsource company CPO transporter.</li> <li>b) There was contract document between Kempas POM and the transporters.</li> <li>c) The RSPO Supply Chain procedure has described on outsource activity.</li> <li>d) Inspection was carried out as additional effort to ensure no contamination sighted book at AP Post.</li> </ol>

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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.
<b>6</b>	<b>Sales and goods out</b>	
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"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number;</li> <li>• A unique identification number.</li> </ul>	<p>The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Sime Darby Plantations Berhad and Global Trade Marketing Department (HQ) on behalf of Kempas POM.</p> <p>Sample of deliveries document were sighted during the audit and it was found all related information were adequate. Kempas POM's RSPO certificate number and product name together with model used were stated in the delivery documents.</p>
<b>7</b>	<b>Registration of transactions</b>	
7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>• are supply chain actors between the mill and final refinery;</li> <li>• take legal ownership and physically handle RSPO Certified Sustainable oil palm products; and</li> <li>• are part of the supply chain of RSPO Certified Sustainable oil palm products</li> </ul> <p>must register their transaction in the RSPO IT platform at the time of physical shipment as required by the rules set by RSPO.</p>	Kempas POM has legal ownership and physical handle RSPO certified sustainable CPO and PK.
<b>8</b>	<b>Training</b>	
8.1	The organization shall have a defined training plan, which is subject to on-going review and is supported by records of the training provided to staff.	Training plan has included the RSPO Supply chain training scheduled in Mar 2018 for staff & workers.

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8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification system. Training shall be specific and relevant to the task(s) performed.	Training had been conducted in Jan 2019 for office clerk and weighbridge operator who handle the weighbridge & relevant paperwork. Training had been conducted by the RSPO PIC. Based on interview with weighbridge clerk, it was noted that the training had been well conveyed & that the clerk was aware on her function/responsibility with regards to RSPO Supply Chain implementation in the organization.
<b>9</b>	<b>Record keeping</b>	
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.	KPOM maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of the RSPO Supply Chain standard requirements. Also refer para 3.1b of this checklist for details.
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.	KPOM maintain retention period of more than 2 years (10 years) and this is to also comply with relevant legal and regulatory requirements. KPOM also had established various reporting template to ensure that they will be able to track movement of their certified FFB as well as finished products (CPO & PK).
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.	Provided.
<b>10</b>	<b>Conversion factors</b>	
5.10.1	Where applicable a conversion rate must be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which must be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ). 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 ( <a href="http://www.rspo.org">www.rspo.org</a> ).	The OER & KER are the conversion rates.
10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	Monthly updated.
<b>11</b>	<b>Claims</b>	
11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO rules on communications and claims.	Relevant information on product claim (including applicable SC model and certificate no.) being correctly indicated in the relevant outgoing paperwork. KPOM has not use any RSPO trademark.
<b>12</b>	<b>Complaints</b>	
12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Relevant information on product claim (including applicable SC model and certificate no.) being correctly indicated in the relevant outgoing paperwork.

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		<p>KPOM has not use any RSPO trademark.          KPOM has not receive any complaint from stakeholder          Should there be any, they refer to Grievances Process procedure &amp; Stakeholder Requests &amp; Responses.</p>
<b>13</b>	<b>Management review</b>	
13.1	The organization is required to hold management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Documented procedure has defined management review will be conducted once a year
13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO SCCS</li> <li>• Customer feedback</li> <li>• Status of preventive and corrective actions</li> <li>• Follow-up actions from management reviews</li> <li>• Changes that could affect the management system</li> <li>• Recommendations for improvement</li> </ul>	<p>Management review meeting carried out in Jan 2019 (combine RSPO, RSPO SCCS and MSPO)</p> <ul style="list-style-type: none"> <li>• Internal audit – 3 Major NCR</li> <li>• Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSP0 related to meeting the contract volume, timely delivery, dispatch documentation) result achieved.</li> <li>• Previous meeting – was highlighted</li> <li>• Changes</li> <li>• Recommendation for improvement – improve the established system</li> </ul>
13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes</li> <li>• Resource needs</li> </ul>	<p>Recommendation for improvement          Recourse sufficient.</p>

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### Mass Balance Model –Module E

Item No	Requirement NOV 2014	Findings
<p><b>E 3</b> <b>E 3.1</b></p>	<p><b>Documented procedures</b> The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements in these requirements</li> <li>b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the facilities procedures for the implementation of this standard.</li> </ul>	<p>a) Kempas POM had revised their documented procedure title '<i>Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001</i>', as provided above. The procedure was kept in file RSPO Supply Chain Manual (SCM/RSPO/SD) Appropriate changes were also made in the change from the previous Segregation to Identity Preserved model. The revised procedure has included the new clause Production volume, Conversion factors, Internal Audit, Complaints and Management Review.</p> <p>b) The Assistant Manager have overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Kempas POM. Interview with sustainability committee member, mill manager, assistant mill manager &amp; weighbridge operator was confirmed they are understood the supply chain requirements.</p>
<p><b>E 3.2</b></p>	<p>The facility shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>KPOM had continued to implement the procedures it had on receiving and processing of RSPO certified and non-certified FFBs. The Weighbridge Clerks knew and kept a list of all certified supply bases (estates) supplying FFBs to KPOM and checked on the validity of the estates' P&amp;C Certificates for Sustainable Palm Oil Production (P&amp;C Certificate).</p> <p>During the receiving of FFBs, the Weighbridge Clerk checked and verified that in-coming RSPO-certified FFBs must be accompanied by consignment note issued by the certified estate. Consignment note must indicate the name of the estate and the number of the RSPO P&amp;C Certificate. For non- RSPO certified FFB, the consignment note issued by the supplier was also verified for quantity but not on the certified status of the FFB.</p>
<p><b>E.4</b> <b>E.4.1</b></p>	<p><b>Purchasing and goods in</b> The site shall verify and document the volumes of certified and non-certified FFBs received.</p>	<p>KPOM had continued to receive certified FFBs from the CU's own supply bases as well as non-certified FFBs from outsiders. There were four supply bases (estates) sending certified FFBs to KPOM. They were Kempas, Kemuning, Serkam Division and Tangkah Estates. For non-certified FFBs, KPOM had sourced them from Three FFB collectors. The Weighbridge Clerk checked and verified the consignment notes issued by the supplying estates for the in-coming RSPO and non-RSPO FFBs. KPOM still kept copies of the FFB Consignment Notes or FFB Delivery Notes issued by the supplying estates.</p>
<p><b>E 4.2</b></p>	<p>The site shall inform the CB immediately if there is a projected overproduction.</p>	<p>There was no overproduction of certified FFBs during the period under review. But, Kempas POM has already applied for extension (in Jan 2019) for production between April 2018 and March 2019. It has been approved by the RSPO.</p>

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<p><b>E.5</b> E.5.1</p>	<p><b>Record keeping</b></p> <p>a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</p> <p>b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The site can only deliver Mass Balance sales from a positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short (i.e. product can be sold before it is in stock)</p>	<p>Available.</p>
<p><b>E 5.2</b></p>	<p>In cases where a mill outsources activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.</p>	<p>KPOM was not involved in crushing of the kernels.</p>
<p><b>E.4</b> E.4.1</p>	<p><b>Sales and good out</b></p> <p>The facility shall ensure that all sales invoices issued for RSPO certified products delivered include the following information:</p> <p>a) The name and address of the buyer;</p> <p>b) The date on which the invoice was issued;</p> <p>c) A description of the product, including the applicable supply chain model (Segregated or Mass Balance)</p> <p>d) The quantity of the products delivered;</p> <p>e) Reference to related transport documentation.</p>	<p>The mill has continued to implement documented procedure related to sales of CPO and PK. '<i>Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001</i>'. All CPO and PK sale to Nuri Refinery and KCP (company own refinery). Sighted the sales invoices issued for RSPO certified product has included name and address of the refinery; date deliver; product description, supply chain model i.e. Mass Balance, quantity of the products delivered as well as transportation documentation such as Borang MPOB L3, Kempas mill Weighbridge ticket, Kebenaran Mengangkut /arahan penghantaran from the transporter company, Deliver order from Kempas palm oil mill.</p>
<p><b>E.5</b> E.5.1</p>	<p><b>Training</b></p> <p>The facility shall provide the training for all staff as required to implement the requirements of the Supply Chain Certification Systems.</p>	<p>Training had been conducted in Jan 2019 for office clerk and weighbridge operator who handle the weighbridge &amp; relevant paperwork. Training had been conducted by the RSPO PIC. Based on interview with weighbridge clerk, it was noted that the training had been well conveyed &amp; that the clerk was aware on her function/ responsibility with regards to RSPO Supply Chain implementation in the organization.</p>
<p><b>E.6</b> E.6.1</p>	<p><b>Claims</b></p> <p>The facility shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules for Communications and Claims.</p>	<p>As to Date no claim was made.</p>



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Attachment 6

### VERIFICATION OF NON-CONFORMITIES DURING LAST SURVEILLANCE ASSESSMENT AT SOU KEMPAS

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
1.1.2 NCR MZK 01 2018	Major	Findings: Records of request and Information regarding Certified Area was found incorrect  Objective evidence : The information given to CB regarding Certified Area at SOU Kempas since 2015 (Recertification Audit) was not correct due to not tally with stated Land Title.	Kempas CU already apply to CB to declared new Certified area. Certified area is declared in accordance to land title of respective of estates. Evidence of land title statement ha attached.	During this audit it was found that the information provided for the Certified Area - SOU Kempas was accurate. The Certified Area has been revised as the corrected figure was consistent with Kempas SOU Land Title.  <b>Status: Closed</b>
2.1.1 NCR RAR 01 2018	Major	Findings: There was a non-compliance with Industry Code of Practice for Working in a Confined Space Area, 2010 requirements.  Objective evidence : At Kempas POM Health surveillance to monitor physically and mentally fit has not been carried out for Entrance Confined Space as per requirement.	A total of 12 employee is identified to have work in CS. They are all sent for Health Declaration for the purpose of permission to work in CS at Pantai Hospital Ayer Keroh in stages from 03/05/2018-31/5/2018. Health Fitness Certificate dated 3/5/2018 showed that the relevant POC was fit for working in CS. ESH Plan to include health surveillance for AESP for once in 2 years. This is to comply on the legal requirement	Sighted Health Fitness Certificate dated 3/5/2018 for PIC working in CS. Sighted New plan that include Medical surveillance for AESP. The list of medical surveillance confined space was made available for a total 12 people with 1 failure (engine driver) in May 18-Sept 2018 at Pantai Hospital. Results issued via Health Fitness Certificate certified by a medical officer.  <b>Status: Closed</b>
4.1.2 NCR STK- 01.2018	Major (Recurrence)	Findings: 1. Operational Control Procedure of PSQM on Chemical Safety Management item 6.4 was not complied with. 2. The plan to reduce pollution was not followed. 3. EQA 1974 (Scheduled Waste) Regulations on Labelling of schedule wasted was not complied with Objective evidence :	1) <b>Tangkah:</b> The chlorine container is stored in Chemical Store; attached with Safety Data Sheet 2) <b>Tangkah:</b> The scheduled waste is labelled accordingly with date of generation. Training on correct labelling and recording of scheduled waste inventory	Audit team has verified at all visited estates that storage of chlorine as per SOP with labelling and stored safely in chemical store. All scheduled wastes were labelled accordingly. Waste waters from emergency showers were directed to sump.  <b>Status: Closed</b>

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		<ol style="list-style-type: none"> <li>1. Tangkah Estate – 5 X 20 Liters containers of Chlorine was found stored in the division office</li> <li>2. Waste waters from emergency showers were directed to field drains in Ayer Panas and Bulumong divisions on Tangkah Estate and Kru Division on Kemuning Estate (recurrence issue)</li> <li>3. Stored scheduled wastes were not labeled on Kru Division on Kemuning Estate and on Bulumong and Ayer Panas Divisions on Tangkah Estate.</li> </ol>	<p>is conducted in June 2018.</p> <p><b>3)Kemuning:</b> The scheduled waste is labelled accordingly with date of generation. Training to store keeper at Kru Division on correct labelling and recording of scheduled waste inventory is conducted in June 2018.</p> <p><b>4)Tangkah &amp; Kemuning:</b> Sump is built. This enables the collection of wastewater and to be used for chemical mixing (recycled).</p>	
4.1.3 NCR RZ 03 2018	Minor	<p>Findings: Frequency of water quality sampling was not done in accordance with SPMS Appendix 7 – SOP for water quality monitoring Table 5.3 item 2</p> <p>Objective evidence :</p> <p>Kemuning Estate: Drinking water sampling was done as follows:</p> <ol style="list-style-type: none"> <li>a. Tebong Division: 23 November 2017, 19 December 2017, 22 March 2018.</li> <li>b. Kru Division: 28 November 2017</li> </ol> <p>Tangkah Estate: Drinking water sampling was done as follows:</p> <ol style="list-style-type: none"> <li>a. Air Panas Division &amp; New Division: 6 June 2017, 1 November 2017, 19 February 2018</li> </ol>	<p><b>Kemuning Estate:</b> Senior Assistant with Medical Assistant (MA) to be in-charge on the monthly monitoring of water sampling for drinking water (e.g. Water sampling analysis dated 31/5/2018 &amp; 22/6/2018).</p> <p><b>Tangkah Estate:</b> Office Clerk is in charge of the monthly water sampling for drinking water while waiting for a replacement for the tendered MA (e.g. Water sampling analysis for drinking water dated 28/5/2018 &amp; 31/5/2018). The water sampling analysis for June 2018 is sent; pending at laboratory.</p>	<p>The estates had sent water samples to Sime Darby Research accredited Laboratory based in Pulau Island. Results of the analysis were sighted and verified. Analysis was made based on the guidelines and the required WHO standard as described in the SOP.</p> <p><b>Status: Closed</b></p>
4.7.5 NCR STK- 02.2018	Major (Recurrence)	<p>Findings: First aid equipment (box) was not available at worksites.</p> <p>Objective evidence :</p> <p>Kemuning Estate – At time of visit First Aid box was not available at site for the Spraying, Harvesting and Loose Fruit collecting Teams (recurrence issue).</p>	<p>All the identified first aider been provided with first aid box at an immediate effect. A refresher First Aid training is planned to be conducted for all the first aider e.g. Mandor to administer first aid assistance, The new form monitoring will be implanted and will be checked every morning.</p>	<p>Field visit to Kemuning estate field no 2001A harvesting operations and Kempas Estate field no P2009A confirmed that the mandores had brought along the First Aid Kit individually for any emergency use at site. The same practice was recorded while present in Tangkah Estate field no P2012 for activity of circle /path spraying.</p> <p><b>Status: Closed</b></p>

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<p>6.5.1 NCR RZ 01 2018</p>	<p>Major</p>	<p>Findings:</p> <ol style="list-style-type: none"> <li>1. Workers' employment contracts were not renewed upon expiry.</li> <li>2. Workers' employment contract was not signed.</li> <li>3. Workers' employment contract was not dated.</li> </ol> <p>Objective evidence : The following contracts have expired and not renewed:</p> <p>Tangkah Estate:</p> <ol style="list-style-type: none"> <li>1. Passport No PD9905436: Contract expired on 8 June 2016.</li> <li>2. Passport No L5285447: Contract expired on 15 July 2017.</li> <li>3. Passport 7012744: Contract expired on 4 July 2017.</li> </ol> <p>Kemuning Estate:</p> <ol style="list-style-type: none"> <li>4. Passport B3275397: Contract expired on 22 June 2015.</li> <li>5. Passport AT 651701: Contract expired on 16 July 2015.</li> <li>6. Passport AT759212: Contract expired on 30 June 2015.</li> <li>7. Ladang Kemuning, Tebong Division contract was not dated and not signed by the company.</li> <li>8. Contract of employment for Karyono was not dated.</li> </ol> <p>Kempas Palm Oil Mill:</p> <ol style="list-style-type: none"> <li>1. Passport No AT761048: Contract expired on 9 April 2018</li> </ol>	<p><b>Tangkah Estate:</b> All contract extension were issued accordingly. Management has assigned a designated PIC to ensure a proper monitoring in future.</p> <p><b>Kemuning Estate:</b> All the stated contract extension for workers were issued accordingly. Management has assigned a designated PIC to ensure a proper monitoring in future.</p> <p><b>Kempas POM:</b> The contract extension for the said worker was made available.</p>	<p>The contract of employment for all sampled local and foreign workers were sighted still valid as verified during this audit:</p> <ol style="list-style-type: none"> <li>1.Kempas Mill (9 local &amp; 2 Indonesia),</li> <li>2.Kempas Estate (4 local, 10 Indonesia &amp; 7 Nepal),</li> <li>3.Kemuning Estate (6 local &amp; 8 Indonesia)</li> <li>4.Tangkah Estate (5 local &amp; 8 Indonesia)</li> </ol> <p><b>Status: Closed</b></p>
<p>6.5.3 NCR RZ 02 2018</p>	<p>Minor</p>	<p>Findings: Linesite inspections were not carried out in accordance with Section 23(2) Workers' Minimum Standard of Housing and Amenities Act 1990</p> <p>Objective evidence : Kemuning Estate:</p>	<p>The workers housing complex inspection is being carried out in weekly basis by Medical Assistant in accordance to the legal requirements.</p>	<p>Line site inspection was carried out by weekly basis, and in accordance with Section 23(2) Workers' Minimum Standard of Housing and Amenities Act 1990.</p> <p>Kempas POM: 29/12/2018, 5/1/2019,</p>

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		<ol style="list-style-type: none"> <li>1. No line site inspection at Tebong linesite inspection: between 20 September 2017 to 4 January 2018.</li> <li>2. No line site inspection at Gemencheh division between 20 September 2017 to 3 January 2018.</li> <li>3. Line site inspection at Kru Division was carried out once a month on 2 November 2017, 30 December 2017, 21 January 2018, 21 February 2018, 21 March 2018</li> </ol>	<p>Linesite inspection for below mentioned division of estates are as follows</p> <ol style="list-style-type: none"> <li>i) Gemencheh (May-June 2018)</li> <li>ii) Kru (May-June 2018)</li> <li>iii) Tebong (May-June 2018)</li> </ol>	<p>12/1/2019, 19/1/2019  Kempas Estate: 29/12/2018, 5/1/2019, 12/1/2019, 19/1/2019  Kemuning Estate: 17/1/2019, 10/1/2019, 3/1/2019 &amp; 27/12/2018.  Tangkah Estate: 18/1/2019, 8/1/2019, 2/1/2019 &amp; 26/12/2018.</p> <p><b>Status: Closed</b></p>
6.10.1 NCR RZ 04 2018	Minor	<p>Findings: Past prices paid for FFB is not available at the weighbridge  Objective evidence :  At Kempas POM, only the prices paid for FFB in March 2018 is displayed at the weighbridge</p>	<p>FFB price from January 2018-April 2018 is displayed at weighbridge station. The weighbridge operator will be in charge of monitoring on the FFB price display.</p>	<p>Current and past prices paid for FFB, January to December 2018, was made available at the mill weighbridge.</p> <p><b>Status: Closed</b></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			
		Kalumpang Estate			

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		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			
5	Seri Intan/Selaba	Seri Intan Oil Mill	Teluk Intan, Perak	3-Mar-11	
		Selaba Oil Mill			
		Seri Intan (+ Selaba) Estate			
		Sabrang Estate			

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		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			

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		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	7-Jul-11	
		Mentakab Estate			
		Chenor Estate			
		Sg Mai Estate			
12	Jabor	Jabor Oil Mill	Kuantan, Pahang	7-Jul-11	
		Jabor Estate			



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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			

## RSPO PUBLIC SUMMARY REPORT

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			
		Tangkah Estate			
		Kemuning Estate			
18	Diamond Jubilee	Diamond Jubilee Palm Oil Mill	Jasin, Melaka	5-Oct-11	
		Serkam Estate			

## RSPO PUBLIC SUMMARY REPORT

		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	<p>* SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bk</p> <p>Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been incorporated in the RSPO Certification Scope of Gng. Mas.</p>
		Gunung Mas Estate			
		Kempas Klebang Estate			

## RSPO PUBLIC SUMMARY REPORT

		Bukit Paloh Estate			
		Yong Peng Estate			
22	Bukit Benut	Bukit Benut Oil Mill	Kluang, Johor	5-Oct-11	<p>* SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP</p> <p>Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2018.</p>
		Bukit Benut Estate			
		Lambak Elaeis Estate			
		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			

## RSPO PUBLIC SUMMARY REPORT

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			
		Binuang Oil Mill			
		Binuang Estate			

## RSPO PUBLIC SUMMARY REPORT

28	Binuang	Sungang Estate	Kunak, Sabah	16-Jan-09	
		Tingkayu Estate			
		Jeleta Bumi Estate			
29	Giram	Giram Oil Mill	Kunak Sabah	16-Jan-09	
		Giram Estate			
		Mostyn Estate			
30	Merotai	Merotai Oil Mill	Tawau, Sabah	16-Jan-09	
		Merotai Estate			
		Imam Estate			
		Tiger Estate			
		Table Estate			
		Lavang Oil Mill			
		Lavang Estate			
		Rasan Estate			
		Belian Estate			
		Kelida Estate			

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31	Lavang	Lavang (Special) Estate	Bintulu, Sarawak	30-Dec-11	
		Pekaka Estate			
		Ruai Estate			
		Dulang Estate			
		Charquest Estate			
		Paroh Estate			
32	Rajawali	Rajawali Oil Mill	Bintulu, Sarawak	30-Dec-11	
		Rajawali Estate			
		Samudera Estate			
		Semarak Estate			
		Bayu Estate			
33	Derawan	Derawan Oil Mill	Bintulu, Sarawak	30-Dec-11	
		Derawan Estate			
		Sahua Estate			
		Takau Estate			

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		Damai Estate			
34	Bintang	Bintang Oil Mill	Johor	NA	<p>* 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 has completed the selling off transaction.</p>
<p>Legends</p> <p>NA - NOT APPLICABLE</p>					



## RSPO PUBLIC SUMMARY REPORT

### INDONESIA

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
1	PT LAHAN TANI SAKTI	Alur Damai Mill		Rokan Hilir District – Riau	Certified	16-Jan-12	
2	PT SAJANG HEULANG	Mustika Mill		Tanah Bumbu District – South Kalimantan	Certified	3-Jul-13	
		KKPA-2 PT.SHE Estate			Certified		
		KKPA-3 PT.SHE Estate			Certified		
		KKPA-5 PT.SHE Estate			Certified		
3	PT LADANGRUMPUN SUBURUBADI	Angsana Mill		Tanah Bumbu District – South Kalimantan	Certified	9-Nov-16	LSI Plasma has been audited by the Certification Body.
		Pantai Bonati Estate			Certified		
		Gunung Sari Estate			Certified		
		SAP 1 Estate	2019		ST-2		

## RSPO PUBLIC SUMMARY REPORT

		KKPA-1 PT.SHE Estate			Certified		
		KKPA-4 PT.SHE Estate			Certified		
4	PT LANGGENG MUARAMAKMUR	Bebunga Mill		Kotabaru District – South Kalimantan	Certified	16-Mar-12	
		Sungai Cengal Estate			Certified		
		Bakau Estate			Certified		
		KKPA Sungai Cengal Estate			Certified		
5	PT KRIDATAMA LANCAR	Sukamandang Mill		Seruyan and East Kotawaringin District – Central Kalimantan	Certified	2-Sep-16	
		Sapiri Estate			Certified		
		Barasdanum Estate			Certified		
		Kuala Kuayan Estate			Certified		
	PT BAHARI GEMBIRA RIA	Ladang Panjang Mill		Muaro Jambi District - Jambi	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
		Ladang Panjang					

## RSPO PUBLIC SUMMARY REPORT

6					Certified		<p>KUD was 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 &amp; Report for PT BGR -</p> <p><a href="https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioYJEAZ">https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioYJEAZ</a></p>
		Plasma BGR Estate	2020				
7	PT TUNGGAL MITRA PLANTATIONS	Manggala Mill		Rokan Hilir District – Riau	Certified	25-Nov-10	
		Manggala 1 Estate			Certified		
		Manggala 2 Estate			Certified		
		Manggala 3 Estate			Certified		
8	PT PARIPURNA SWAKARSA	Pondok Labu Mill		Kotabaru District – South Kalimantan	Certified	16-Mar-12	
		Pondok Labu			Certified		
		Binturung Estate			Certified		

## RSPO PUBLIC SUMMARY REPORT

9	PT BERSAMA SEJAHTERA SAKTI	Rampa Estate	-	Kotabaru District – South Kalimantan	Certified	21-Oct-16	The new project at KKPA Maju Bersama by the plasma community was currently in nursery stage and not yet due for harvesting, the year of planting was in 2014.
		Sesulung Estate	-		Certified		
		Gunung Aru Mill	-		Certified		
		Gunung Aru	-		Certified		
		Gunung Kemasan Estate	-		Certified		
		Laut Timur Estate	-		Certified		
		Pantai Timur Estate	-		Certified		
		KKPA MBP	2019		-		
10	PT GUTHRIE PECCONINA	Rantau Panjang Mill	-	Musi Banyuasin District – South Sumatera	Certified	16-Mar-12	Sungai Jernih Estate and the KKPA Estates has undergone audit.
		Rantau Panjang	-		Certified		
		Bumi Ayu Estate	-		Certified		
		Karang Ringin Estate	-		Certified		
		Napal Estate	-		Certified		

## RSPO PUBLIC SUMMARY REPORT

		Mangun Jaya Estate			Certified		
		Sungai Jernih Estate and GPI KKPA	2020				
		Estate					
11	PT LAGUNA MANDIRI	Rantau Mill		Kotabaru District – South Kalimantan	Certified	30-Dec-11	
		Rantau			Certified		
		Betung			Certified		
		Matalok Estate			Certified	1-Apr-14	
		Sekayu Estate			Certified		
12	PT INDOTRUBA TENGAH	Sekunyir Mill		Seruyan and West Kotawaringin District – Central Kalimantan	Certified	23-Nov-10	
		Sekunyir			Certified		
		Seruyan Estate			Certified		

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13	PT SWADAYA ANDIKA	Selabak Mill	-	Kotabaru District – South Kalimantan	Certified	16-Mar-12	
		Selabak	-		Certified		
		Randi Estate	-		Certified		
		Sangkoh Estate	-		Certified		
		Lanting Estate	-		Certified		
14	PT BINA SAINS CEMERLANG	Sungai Pinang Mill	-	Musi Rawas District – South Sumatera	Certified	11-Sep-12	
		Sungai Pinang	-		Certified		
		Bukit Pinang Estate	-		Certified		
15	PT TEGUH SEMPURNA	Pemantang Mill	-	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	9-Sep-16	
		Pemantang	-		Certified		
		Kawan Batu Estate	-		Certified		
		Hatan Tiring Estate	-		Certified		
		Batang Garing Estate	-		Certified		
		Teluk Bakau Mill	-		Certified	1-Dec-16	

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16	PT BHUMIREKSA NUSA SEJATI	Teluk Bakau	-	Indra Giri Hilir District – Riau	Certified	1-Apr-14	
		Mandah	-		Certified		
		Nusa Lestari Estate	-		Certified		
		Nusa Perkasa Estate	-		Certified		
		Rotan Semelur Estate	-		Certified		
17	PT ANEKA INTIPERSADA	Teluk Siak Mill	-	Pekanbaru, Siak District – Riau	Certified	8-Dec-16	
		Teluk Siak	-		Certified		
		Pinang Sebatang Estate	-		Certified		
		Aneka Persada Estate	-		Certified		
18	PT TAMACO GRAHA KRIDA	Ungkaya Mill	-	Morowali District – Sulawesi Tengah	Certified	10-Jul-12	
		Ungkaya	-		Certified		
		Plasma TGK Estate	-		Certified		

**RSPO PUBLIC SUMMARY REPORT**

19	PT SIME INDO AGRO	Bukit Ajong Mill	-	Sanggau District –West Kalimantan	Certified	18-Jul-16	Land legalisation process was still in process
		West Estate	-		Certified		
		East Estate	-		Certified		
		East* Estate	2019		-		
		East Plasma Estate	-		Certified		
		West Plasma Estate	-		Certified		
20	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	Blang Simpo Mill	2020	Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam	Certified	3-May-13	
		Tamiang (PT PPP) Estate	-		Certified		
		Batang Ara (PT PSK) Estate	-		Certified		
		Blang Simpo-01 Estate	-		Certified		
		Blang Simpo-02 Estate	-		Certified		
		Lembiru Mill	-		Certified		Perijinan' process was ongoing



## RSPO PUBLIC SUMMARY REPORT

21	PT SANDIKA NATAPALMA	Lembiru	-	Ketapang District – West Kalimantan	Certified	3-Jul-14	Perijinan informasi lahan was obtained in 2015 while the other 'perijinan' was still in processing
		Awatan Estate	-		Certified		
		Karya Palma Estate	2019		-		
		KKPA SNP Estate	2020		-		
		Pelanjau (PT BAL) Estate	2019		-		
22	PT BUDIDAYA AGRO LESTARI	Sungai Putih (PT BAL) Estate	2019	Ketapang District – West Kalimantan	-		
		Beturus (PT BAL) Estate	2019		-		
		KKPA BAL Estate	2020		-		
23	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	2019	Sanggau District – West Kalimantan	-	NA	The case was under RSPO Complaints Panel. Please find latest information on 'Updates on PT MAS' worksheet
		MAS 1 Estate	2019		-		
		MAS 2 Estate	2019		-		

## RSPO PUBLIC SUMMARY REPORT

	MAS 4 Estate	2019		-	
	Plasma MAS Estate	2020		-	

### INDONESIA – PT MAS UPDATE

<b>RSPO Certification Target Date for PT MAS</b>	The target date for certification is by 2017 subject to the progress of the matter being resolved.
<b>Overview of RSPO Certification Progress for PT MAS</b>	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 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.
<b>Progress Updates</b>	<p><b>Progress Update for PT MAS</b></p> <p>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 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 were two groups of communities: TKPP (7 of 9 villages) and Kerunang &amp; Entapang (2 of 9 villages).</p> <p>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 was 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:</p> <p>Sime Darby Plantation was 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>

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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.

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.

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>

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### NBPOL

MU	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,	Certified	15-Feb-18
		Giligili Estate				
		Waigani Estate				
		Sagarai Estate				
		Padipadi Estate				

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		Mariawatte Estate		Papua New Guinea		
		East Gurney Estate				
		West Gurney Estate				
		East Sagarai Estate				
		West Sagarai Estate				
3	Poliamba (POL)	Poliamba Oil Mill	NA	New Ireland Province, Papua New Guinea	Certified	19-Mar-12
		Kara Estate				
		Nalik Estate				
		West Coast Estate				
		Noatsi Estate				
		Madak Estate				
		North Smallholders (613)				
		South Smallholders (863)				
		West Smallholders (309)				

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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				

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		Kumbango Oil Mill				
		Kapiura Mill				
		Numundo Mill				
		Waraston Mill				
		Bebere Estate				
		Kumbango Estate				
		Togulo Estate				
		Dami Estate				
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				

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		Daliavu Estate				
		Sapuri Estate				
		Malilimi Estate				
		Rigula Estate				
		Nomundo Estate				
		Navarai / Karato ME /KDC EU Estate				
		Volupai / Lotomgam / Natupi / Goruru Estate				
		Lolokoru Estate				
		Ove Estate				
		Tamare Estate				
	Markham Farming Company Limited	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



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7	(MFCL)/Markham Agro Pte. Ltd.					HCV/HCS, SEJIA 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.
		Erap Estate	Sep-20		RaCP	

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**LIBERIA**

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Remarks
	SOU Name					
1	Sime Darby Plantation  (Liberia) Grand Cape Mount	Grand Cape Mount Mill	2019	Grand Cape Mount  County	Not yet Certified	<p>In May – September 2011, SDPL has undergone a series of assessment including SEIA and HCV. Assessment in conformance with the RSPO New Planting Procedures to begin planting.</p> <p>*Note: RSPO NPP Announcements can be found at <a href="http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?">http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?</a></p> <p>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 &amp; 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>

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		Bomi Estate				
		Lofa Estate				
		Matambo Estate				
		Grand Cape Mount Estate				