

SIRIM QAS INTERNATIONAL SDN. BHD.

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

File Ref.: ES10171011

RSPO PUBLIC SUMMARY REPORT

CLIENT

: SIME DARBY PLANTATION BERHAD - SOU 6 TENNAMARAM

PARENT COMPANY: SIME DARBY PLANTATION BERHAD

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

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

Certification Unit	Mill and Supply	GPS	Location	Location
	Base	Latitude	Longitude	Location
	Tennamaram POM	3°23' 44.30" N	101°25' 03.41" E	45600 Bestari Jaya, Selangor
SOU 6	Tennamaram Estate	3°24' 11.35' N	101°23' 59.24" E	45600 Bestari Jaya, Selangor
Tennamaram	Sungai Buloh Estate	3°18' 32.27" N	101°19' 07.23" E	45700 Bukit Rotan, Selangor
	Bukit Talang Estate	3°24' 09.15' N	101°18' 35.72" E	45000 Kuala Selangor

MAP: See Attachment 1 18-22 November 2019 DURATION : 21 auditor days AUDIT DATE : Annual Surveillance Audit Recertification Audit TYPE OF AUDIT : No. 4 STANDARD: MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018 SCOPE OF CERTIFICATION: Production of Sustainable Crude Palm Oil and Palm Kernel Using Identity Preserved Supply Chain Model VALIDITY OF RSPO CERTIFICATE: 03 March 2016 - 02 March 2021 The following attachments form part of this report: List of additional site(s) Non-conformity Report(s) Acknowledgement by Client's Representative Report by Audit Team Leader Mohd Razman Salim Name Name Sime Da Vantation Berhad uloh Extate Signature Signature NOOR ARIZAN BIN AHMAD Senior Manager 13 December 2019 Date Date

SUMMARY OF AUDITS

			Stage 2 a	udit / Recertificat	ion audit			
On-site audit date	:	11 – 15/0	01/2016		No. of auditor days :	15		
Audit team	:	Ruzita Al	od Gani, M	lohd Razman Salir	n & Selvasinggam T. Kan	diah		
No. of major NCR	:	1	Indicator	: 2.1.1		Closing 11/3/2016	date	
No. of minor NCR	:	2	Indicator	: 4.1.2 & 6.10.4				
Indicate the	:	Emplo	oyees	Settlers	Villagers	Suppliers		
stakeholders		,	1		Ī			
interviewed during the		Contract	workers	NGOs	Govt. agency	Independen	t growers	
on-site audit		/						
		Indigeno people	us	Contractor	Others (Please specify)			
		N	Α	/				
Supply base sampled	:	Sungai B	uloh Estat	e and Bukit Talang	Estate			
Justification of audit	:	-						
Report approved by	:	-			Approval date: -			

		An	nual	Surveillance Aud	lit 1	
On-site audit date	:	20-23/12/16			No. of auditor days :	14
Audit team	:	Hazani Othma T. Kandiah	Hazani Othman, Mohd. Zulfakar Kamaruzaman, Rozaimee T. Kandiah			o. Rahman, Selvasingam
No. of major NCR	:	4 Indi	4 Indicator :.4.4.2, 4.6.11, 4.7.3			Closing date : 6/2/2017
No. of minor NCR	:	3 Indi	cator	: 2.2.2, 4.1.2, 4.7.5	5	
Indicate by ticking the	:	Employees	;	Settlers	Villagers	Suppliers
stakeholders interviewed		$\sqrt{}$		NA		
during the on-site audit		Contract worke	ers	NGOs	Govt. agency	Independent growers
		Indigenous per	ople	Contractor	Others (Please specif	y)
		NA			Union, Headmaster	
Supply base sampled	:	Tennamaram (+ Elr	nina) Estate, Sunga	ai Buloh Estate	
Changes since the last	:	Elmina Estate	has I	been amalgamated	l into Tennamaram Esta	ate as one of the division
audit		known as the E	Elmin	a Division.		
Justification of audit	:	-				
planning						
Report approved by	:	Aminah Ang			Approval date: 17	7/05/2017

			Annual	Surveillance Audi	:4.0	
			7		· · · –	1.0
On-site audit date	:		mber 2017		No. of auditor days :	18
Audit team	:	Mohd Zu	lfakar Kam	ıaruzaman (LA), Ro	ozaimee Ab Rahman, S	Selvasingam T. Kandiah,
		Amir Bah	ari			
No. of major NCR	:	6	Indicator:	2.1.1, 4.1.1, 4.5.4,	4.7.2, 5.3.2 &	Closing date :
			D4.1 (Su	pply Chain)		8/2/2018
No. of minor NCR	:	1	Indicator:	4.1.2		
Indicate by ticking the	:	Empl	oyees	Settlers	Villagers / Local	Suppliers
stakeholders interviewed		-	-		communities	1
during the on-site audit		V			V	V
		Contract	workers	NGOs	Govt. agency	Independent growers
					<u> </u>	
		Indigenou	us people	Contractor	Others (Please specif	y)
		N	IA .	V	,	ĺ
Supply base sampled	:	Tennama	aram Estate	and Bukit Talang	Estate	
Changes since the last	:	No Chan	ges			
audit						
Justification of audit	:	-				
planning						
Report approved by	:	Radziah	Binti Mohd	Daud	Approval date :	19/03/2018

			Annual	Surveillance Audi	it 3	
On-site audit date	:	12 – 16 N	lovember 2	2018	No. of auditor days:	20.0 auditor day
Audit team	:			aruzaman (LA), Ro	zaimee Ab Rahman, Se	lvasingam T. Kandiah
			ayu Zulkifli			
No. of major NCR	:	2		: 2.1.1, D 4.2 (Supp		Closing date : 11/02/19 (latest)
No. of minor NCR	:	5	Indicator	: 2.1.3, 4.1.2, 4.1.3	, 6.1.4, 6.8.3	
Indicate by ticking the stakeholders interviewed	:	Employe	es	Settlers	Villagers / Local communities	Suppliers
during the on-site audit		$\sqrt{}$			$\sqrt{}$	$\sqrt{}$
		Contract	workers	NGOs	Govt. agency	Independent growers
		√			1	
			us people	Contractor	Others (Please specify	y)
			Α	V		
Supply base sampled	:			e, Sungei Buloh Est	ate and Bukit Talang Es	state
Changes since the last audit	:	No chang	ges			
Justification of audit planning	:	The total allocation of auditor days for SOU Tennamaram were: 20.0 auditor days Mill = 6 days (5 day for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) There was three (3) estates audited namely Tennamaram Estate, Sungei Buloh Estate, Bukit Talang Estate. A 6 man-day was allocated only for Tennamaram Estate 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. A four (4) man-day for each balance two Estates (Bukit Talang and Sungei Buloh) was allocated for verification of safety and health, environment, good agriculture best practices, Social, HCV and the verification of Land History and Land Title. The total for the entire CU is therefore 20 man-day which justified the no of auditors and their respective days for this audit.				
Report approved by	:		Mohd. Dau		Approval date: 22	/02/2019

		Annual	Surveillance Audi	it 4		
On-site audit date :	18 – 22 N		2019	No. of auditor days :	21	
Audit team :	Mohd Ra	Mohd Razman Salim, Mohd Zulfakar Kamaruzaman (LA), Rozaimee Ab Ra Mohd Ab Raouf Asis				
No. of major NCR :	NA	Indicator:	NA		Closing date : NA	
No. of minor NCR :	2	Indicator	: 2.1.2 & 3.3.2			
Indicate by ticking the : stakeholders interviewed during the on-site audit	Employee Workers organizat		Settlers	Villagers / Local communities	Suppliers	
	1	1		V	V	
	Contract	workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders	
	1	1		V		
	Indigenou	ıs people	Contractors	Others (Please specif	(y)	
	N		$\sqrt{}$			
Supply base sampled :	Tennama	ram Estate	e, Sungei Buloh Est	ate and Bukit Talang Es	state	
Changes since the last : audit			d aread, planted an Immary of Informati			
Justification of audit : planning	The total allocation of auditor days were: 21.0 auditor days Mill = 5 mandays (4 day-safety, environment, GHG, Social + 1 day-supply chain) Tennamaram Estate = 5 mandays (safety, environment, GAP, Social, HCV) Bukit Talang Estate = 5 mandays (safety, environment, GAP, Social, HCV) Sungei Buloh Estate = 6 mandays (larger area than the rest of estates in the SOU)					
Report approved by :	Kamini S	ooriamoort	hy	Approval date: 13	3/12/2019	

SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA	1	ASA 2	2	ASA 3	ASA 4		
Projection Period		Dec 2016	6 – Nov	Dec 2017 -	– Nov	Dec 2018 – Nov	Nov 2019 – Oct		
		201		2018		2019	2020		
Certified FFB Processed (MT)		234,649.32		229,730	.85	242,618.49	222,902.67		
Production of Certified CPO (MT)		45,417.42		48,243.	48	50,317.65	47,136.06		
Production of Certified PK (MT)		11,486.44		12,635.	20	13,382.76	12,740.13		
Certified Areas (Ha)		12,00	2.52	12,002.	52	12,002.52	*11,202.01		
Planted Areas (Ha)		11,28	2.65	11,274.	85	11,274.85	**10,463.92		
Production Areas (Ha)		9,594.84		9,545.4	14	9,544.95	8,305.77		
HCV Areas / Conservation Areas (Ha)		3.2	.6	3.26		3.26	***2.81		
	*Certified area reduc	ed by 800.5	1 ha :	<u> </u>		L			
REMARKS	Estate		Hectara	ge reduction	Rema				
	Tennamaram			735.98		Sold to SD Property.			
	Sg. Buloh			1.86		Government road widening project and land			
	Bt. Talang			62.67		acquisition for flood mitigation. Land acquired for West Coast Expressway.			
	Dt. Talariy			02.07	Lanu	acquired for vvest coa	st Expressway.		
	**Planted Ha reduce	d by 810.93	ha:						
	Estate		Hectarage reduction		Remarks				
	Tennamaram	1.86							
	Sg. Buloh			1.86		Government road widening project and land acquisition for flood mitigation.			
	Bt. Talang			62.67		acquired for West Coa			
				10.42	Land converted to nursery.				
	***Revised hectares	based on H	CV re-ass	essment repo	rt dated	in Nov 2019.			

TABLE 2

	PO	PK
Last years certified volume (MT)	50,317.65	13,382.76
Last years actual certified sold (MT)	26,612.77	3,666.41
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	17,850.48	8,194.53
New year certified volume (MT)	47,136.06	12,740.13

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1.0 AUDIT PROCESS

1.1 Certification Body

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

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and re-accredited by ASI on 3 October 2019 (accredited 2014).

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Razman Salim	Lead Auditor Social, HCV	Possessed B. Sc. Forestry from UPM with more than 7 years of working experience in the RSPO P&C and MSPO Lead Auditor.
Mohd Zulfakar Kamaruzaman	Auditor Social	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor.
Rozaimee Ab. Rahman	Auditor Health & Safety, Environment and Time Bound Plan	Holds a B. Sc. of Agriculture from UPM. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO.
Mohd Ab Raouf Asis	Auditor Good Agriculture Practice	Obtained qualification in B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM in 2007. He has been in the plantation industry for 7 years assisting Estate Manager managing palm oil estates. He has been trained as RSPO as well as MSPO Lead Auditor.
Suzalina Kamaralarifin	Auditor Supply Chain	Holds a B. Sc. in Chemistry (Industrial Chemistry) from UTM. She had more than 5 years of working experience in the oil palm related industry (palm oil mill, oleochemicals and refinery).

1.3 Audit methodology

The audit covered the 1 palm oil mill and 3 of its supply base. The sampling of the number of the supply base was using the formula of $0.8\sqrt{y}$. The 3 supply base covered during the audit are Tennamaram Estate, Sungei Buloh Estate and Bukit Talang Estate. The audit included an on-site audit to the estates and mill houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

Stakeholder consultation was carried out during the on-site audit. In general, there was no negative comments made against this Certification Unit. In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below:

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers) 2) Settlers	The following were confirmed during the conduct of audit as there was no evidence to prove otherwise: All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in Hindi//English/Bahasa as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer. They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime. They have been getting salaries above RM1,100 since Jan 2019. Salaries were paid before the 7th of every month. No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment. No discrimination between migrant workers and local workers, between male and female workers. Comfortable housing with water and electricity provided. Local workers choose to stay in their houses in the nearby villages. Have access to affordable food from the canteen/sundry shops within the estate/mill premises. Entitled to free medical facilities at the estate clinic. Have representatives who attend regular meetings with the management where they can put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects. They knew the types of work offered at mill & estate when they were in their own countries. All migrant workers keep their own passports.
,	
3) Villagers / Local communities (including women representatives, displaced communities)	 Interviewed local communities from Kg. Raja Musa and Kg Rantau Panjang, confirmed no land dispute.
4) Suppliers	■]Fair dealings with the SOU. ■ Payments are made within 1 months of invoice.
5) Contract workers	Not available for this audit.

6) Local & national NGOs	Not available for this audit.
7) Government agencies / Statutory bodies	 No land claims/disputes and no social issues. Harmonius co-existence.
8) Independent growers / Smallholders	 There was no third-party FFBs sent to the mill. No contract involved with smallholder.
9) Indigenous people	 No indigenous people living nearby to the SOU.
10) Contractor	 Sampled CPO Transporter, FFB transporter, hardware supplier have been providing services to the SOU more than 5 years. Signed a contract and understands contractual obligations and the need to comply with legal requirements. Fair dealings with the SOU. Payments are made within 1 months of invoice. The mill and estate staff will verify the work done before his invoice can be approved for payment. Signing of contract was with HQ. Contract terms are clear and fair. Renewal of contract is via tender system. Knows about minimum wages and workers are paid RM150 per day, and make statutory contributions such as EPF and SOSCO. Terms and conditions are clear and fair. Have attended RSPO/MSPO briefing and stakeholder meetings. Gives estate copies of worker details and payslips.
11) Previous land owner (if any)	Not applicable.
12) Others (please specify)	Not applicable.

1.5 Audit plan : Refer to Attachment 2

Date of next audit: The next surveillance audit will be conducted within 12 months but not sooner than 9 months from this audit. For RA, the next RA will be conducted at least 4 months prior to expiry date of the certificate.

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Tennamaram certification unit (CU) is one of the Sime Darby Plantation Berhad (SDPB) Strategic Operating Unit (SOU). The CU is also known as SOU 6 and was certified to the RSPO P&C by SIRIM QAS International Sdn Bhd in 2015. In 2016, the CU was certified with one mill and 4 estates. For 2017, the number of unit of supply base of SOU 6 had been reduced to 3, i.e. Tennamaram Estate, Bukit Talang Estate and Sungai Buloh Estate. Previously Elmina Estate had been amalgamated into Tennamaram Estate, which now known as Elmina Division (i.e. as a new sub-unit of Tennamaram Estate).

The palm oil mill maintained its capacity of 60 mt FFB / hour. All the estates within the CU have been fully developed before the year of 2005.

The SOU did not has other management system certification beside of RSPO P&C and Supply Chain.

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

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

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

Estates	FFB Production (MT)	Percentage (%)	Certifying CB
Tennamaram (inclusive of Elmina)	50,512.69	23.78	SIRIM
Bukit Talang	58,332.64	27.47	SIRIM
Sungai Buloh	98,532.19	46.39	SIRIM
Bukit. Kerayong	1,926.57	0.91	BSI
Bukit Cherakah	3,082.99	1.45	BSI
Total	212,387.08	100.00	

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

Estates	FFB Production (MT)	Percentage (%)	Certifying CB
Tennamaram (inclusive of Elmina)	45,300.29	20.32	SIRIM
Bukit Talang	72,893.67	32.70	SIRIM
Sungai Buloh	104,708.71	46.98	SIRIM
Total	222,902.67	100.00	

<u>Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period</u>
(Nov 2018 – Oct 2019)

RSPO Supply Chain Model : Identity Preserved	Total (MT)
FFB Received	212,387.08
FFB Processed	212,266.06
CPO Production	45,068.63
PK Production	11,962.15
CPO delivered as RSPO certified	26,612.77
CPO delivered under other schemes (MT)	-
CPO delivered as non-RSPO certified	17,850.48
PK delivered as RSPO certified	3,666.41
PK delivered under other schemes (MT)	-
PK delivered as non-RSPO certified	8,194.53
Credits traded through Books and Claim	0.00

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

	Total (MT)
FFB Received	222,902.67
FFB Processed	222,902.67
Certified FFB	222,902.67
CPO Production	47,136.06
PK Production	12,740.13
CPO delivered as certified	47,136.06
CPO delivered under other schemes (MT)	-
CPO delivered as non-certified	-
PK delivered as RSPO certified	12,740.13
PK delivered as non-certified	-
PK delivered under other schemes (MT)	-

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Tennamaram (inclusive of Elmina)	2,181.68	2,477.35
Sungei Buloh	4,821.36	5,152.22
Bukit Talang	3,460.88	3,572.44
Total	10,463.92	11,202.01

Table 6: Planting profile for Tennamaram Estate

Year of planting	Planting Cycle (1st, 2nd, 3rd etc Generation)	<u>Mature/Immature</u> (<u>Ha)</u>	Planted area (ha)	Percentage of planted area
1989	1 st	Mature	78.29	3.59
1990	1 st	Mature	22.00	1.01
1991	3 rd	Mature	119.72	5.49
1993	3 rd	Mature	10.24	0.47
1994	1 st	Mature	80.25	3.68

1995	1 st	Mature	52.84	2.42
1996	3 rd	Mature	16.00	0.73
1997	3 rd	Mature	83.96	3.85
1999	3 rd	Mature	107.41	4.92
2002	1 st	Mature	9.00	0.41
2002	2 nd	Mature	35.91	1.65
2003	2 nd	Mature	71.09	3.26
2004	2 nd	Mature	53.58	2.46
2006	2 nd	Mature	180.97	8.29
2007	2 nd	Mature	67.34	3.09
2008	2 nd	Mature	88.37	4.05
2009	1 st	Mature	10.00	0.46
2009	2 nd	Mature	54.22	2.49
2010	2 nd	Mature	220.80	10.12
2011	2 nd	Mature	104.27	4.78
2013	4 th	Mature	36.47	1.67
2014	4 th	Mature	63.58	2.91
2015	4 th	Mature	119.12	5.46
2017	4 th	Immature	94.97	4.35
2018	4 th	Immature	162.63	7.45
2019	4 th	Immature	238.65	10.94
TOTAL			2,181.68	100.00

Table 7: Planting profile for Sungei Buloh Estate

Year of Planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature/Immature	Planted Area (Ha)	Percentage of Planted (Ha)
1992	2nd	Mature	224.09	4.65
1993	2 nd	Mature	525.51	10.90
1994	Rubber to Oil Palm	Mature	67.50	1.40
1995	2nd	Mature	207.80	4.31
1996	2nd	Mature	196.50	4.08
1997	2nd	Mature	293.53	6.09
1998	2nd	Mature	329.00	6.82
2000	2nd	Mature	68.50	1.42
2001	2nd	Mature	128.32	2.66
2002	2nd	Mature	254.40	5.28
2003	2nd	Mature	84.70	1.76
2004	2nd	Mature	74.90	1.55
2006	2nd	Mature	127.90	2.65

2007	3 rd	Mature	173.30	3.59
2008	3 rd	Mature	200.50	4.16
2009	3 _{rd}	Mature	154.00	3.19
2010	3 _{rd}	Mature	330.40	6.85
2011	3 _{rd}	Mature	77.50	1.61
2013	3 _{rd}	Mature	402.31	8.34
2014	3 _{rd}	Mature	217.90	4.52
2015	3 _{rd}	Immature	296.27	6.14
2016	3 _{rd}	Immature	180.70	3.75
2017	3 _{rd}	Immature	205.83	4.27
Total			4,821.36	100.00

Table 8: Planting profile for Bukit Talang Estate

Year of Planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature/Immature	Planted Area (Ha)	Percentage of Planted (Ha)
1991	3rd	Mature	0	0
1992	3 rd	Mature	0	0
1993	3 rd	Mature	56.03	1.62
1994	3 rd	Mature	59.65	1.72
1995	3 rd	Mature	0	0
1996	3 rd	Mature	90.89	2.63
1997	3 rd	Mature	171.08	4.94
1998	3 rd	Mature	260.58	7.53
1999	3 rd	Mature	129.30	3.74
2000	3 rd	Mature	219.51	6.34
2001	3 rd	Mature	390.28	11.28
2002	3 rd	Mature	200.11	5.78
2003	3 rd	Mature	278.78	8.06
2004	3 rd	Mature	47.74	1.38
2007	3 rd	Mature	92.04	2.66
2008	3 rd	Mature	46.51	1.34
2009	3 rd	Mature	42.68	1.23
2011	3 rd	Mature	47.38	1.37
2012	3 rd	Mature	297.11	8.58
2013	3 rd	Mature	52.11	1.51
2014	3 rd	Immature	46.63	1.35
2016	3 rd	Immature	422.55	12.21
2017	3 rd	Immature	235.73	6.81
2018	3 rd	Immature	59.19	1.71
2019	3 rd	Immature	215.00	6.21
	Total		3460.88	100.00

2.3	Organizational Information/Contact Person(s) The details of the contact person is as shown below:					
	Name	:	Mohd Azhar Md. Zain			
	Position	:	Mill Manager			
	Address	:	45600 Bestari Jaya			
			Selangor Darul Ehsan			
	Phone no.	:	+603-32719701			
	Fax no.	:	+603-2719062			
	Email	:	kks.tennamaram@simedarby.com			
3.0	AUDIT FINDING	GS				
3.1	Changes to cert	tified pr	roducts in accordance to the production of the previous year			
	There was no c	hange t	to the certified products since last assessment.			
3.2	Progress and ch	hanges	in time bound plan (Refer to Attachment 6 for the time bound plan)			
i.	Have all the est	ates ur	nder the parent company been certified? Yes No			
	If no, comments	s on the	e organization's compliance with the RSPO partial certification rules :			
	2020 as verific Ladangrumpun	ed thro Subur	n – Indonesian Operations is in progress to certify all 7 SOUs from 2019 to bugh the Time Bound Plan. The SOUs are PT Sime Indo Agro, PT Abadi, PT Bersama Sejahtera Sakti, PT Bahari Gembira Ria, PT Guthrie PT Sandika Nata Palma & PT Budidaya Agro Lestari.			
ii.	Are there any cl	hanges	s to the organization's time bound plan? Yes No			
	If yes, comment	t in tern	ns of acceptance or non acceptance on the changes in the time-bound plan?			
	The time bound Attachment 7 of		for Sime Darby Plantation Sdn Bhd, updated as at June 2019 is provided in port.	,		
iii.	Are there assoc	iated s	mallholders (including scheme smallholders) in the			
			ssociated smallholders (including scheme their fruit supply is included, by the mill, in its			
	If no, please sta	ite reas	Not applicable. There is no associated smallholders supplying FFB to the SOU.			
iv.	Any new acquis	sition wl	hich has replaced primary forests or HCV areas Yes No			
3.3	Other changes	(e.g. or	ganizational structure, new contact person, addresses, etc.)			
	Sime Darby Plantation Sdn Bhd has been changed to Sime Darby Plantation Berhad.					

3.4		of previous non-conformities * Closed Not closed* It closed, minor non conformity will be upgraded to major non conformity				
3.5.	Compla	aint received from stakeholder (if any)				
	No con	mplaints from stakeholders were observed.				
4.0	DETAI	LS OF NON-CONFORMITY REPORT				
4.1	For P&	C (Details checklist refer to Attachment 6):				
		o. of minor NCR(s) s refer to Attachment 4) List: 2.1.2 & 3.3.2				
		o. of major NCR(s) s refer to Attachment 4) List: NA				
4.2	For SC	(Details checklist refer to Attachment 6):				
		no. of minor NCR(s) List: NA s refer to Attachment 5)				
		o. of major NCR(s) s refer to Attachment 5) List: NA				
5.0	The aumanag	CONCLUSION udit team concludes that the organization has / has not* established and maintained its ement system in line with the RSPO P&C requirements of the standard and demonstrated the of the system to systematically achieve agreed criterion & requirements.				
6.0	RECOMN	MENDATION				
		No NCR recorded. Recommended to continue certification.				
		Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.				
		Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs .				
		Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.				
		Recommended to continue certification.				
		Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s) have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.				
		Note: Major NCRs which are not addressed within a further 60 days shall result in the certificate being withdrawn.				

7.0	HAVE BEEN SATISF. ACTIONS PLANS PR	ACTORILY REVIEWED, ACCOVIDED ON MINOR NON C	TIONS TAKEN ON MAJOR NON CEPTED AND VERIFIED AND AL ONFORMITIES HAVE BEEN SAT FOR CONTINUATION OF RSPO	L CORRECTIVE ISFACTORILY
Audit	Team Leader:	MOHD RAZMAN SALIM	4	13/12/2019

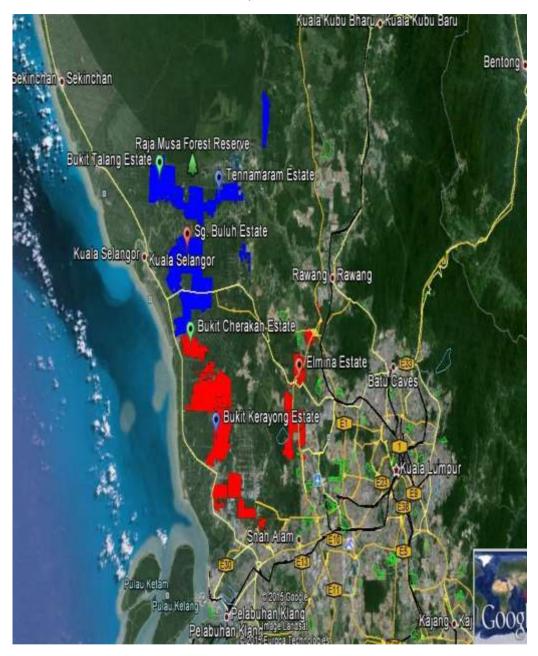
(Signature)

(Date)

(Name)

Attachment 1 - Map

Map of SOU Tennamaram



Attachment 2

RSPO Surveillance 4 Audit Plan

1. Objectives

The objectives of the audit are as follows:

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

2. Date of assessment : 18 to 22 November 2019

3. Site of assessment : SOU Tennamaram

Tennamaram Oil MillTennamaram EstateSungei Buloh EstateBukit Talang Estate

4. Reference Standard:

- a. MYNI 2019 for RSPO P&C 2018
- b. RSPO Certifications Systems for P&C, June 2017
- c. RSPO Supply Chain System, June 2017
- d. Company's audit criteria including Company's Manual / Procedures

5. Assessment Team

a) Lead Auditor : MOHD RAZMAN SALIM (HCV, SOCIAL, TIME BOUND PLAN)

b) Auditors : MOHD ZULFAKAR KAMARUZAMAN (SOCIAL)

ROZAIMEE AB RAHMAN (ENVIRONMENTAL, SAFETY & HEALTH)

: MOHD AB RAOUF ASIS (GAP)

: SUZALINA KAMARALARIFIN (SUPPLY CHAIN)

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

7. Audit Method

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

8. Audit Findings

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

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

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

9. Confidentiality Requirements

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

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

10. Working Language : English and Bahasa Malaysia

11. Reporting

a) Language : English

b) Format : Verbal and written

c) Expected date of issue : 2 weeks after the closure of the Major NC / or if

minor NC, 30 days from the last day of this audit.

12. Facilities Required

a. Room for discussion

b. Relevant document and record

c. Personnel protective equipment if required

d. Photocopy facilities

e. A guide for each group

13. Assessment Programme Details : As below

Summary of audit plan

Day	Razman	Zulfakar	Rozaimee	Raouf	Suzalina
Monday	POM	POM	Tennamaram	Tennamaram	-
Tuesday	Tennamaram	Tennamaram	Bukit Talang	Sungei Buloh	-
Wednesday	Bukit Talang	Tennamaram	Sungei Buloh	Sungei Buloh	-
Thursday	Sungei Buloh	Bukit Talang	POM	Bukit Talang	-
Friday	Sungei Buloh	Sungei Buloh	POM	Bukit Talang	POM

Date / Time	Coverage of assessment / Activity / Site	MRS	MZK	RAR	RA	SK
Day 1 - 18/11/2019	Opening Meeting – Venue: Tennamaram POM					
	Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes	,	,	,	,	
9.00am – 9.30am	Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas,	'	,	,	,	
	machinery, FFB supply bases , Time bound plan, actions taken to address previous audit findings.					
9.30am – 12.30pm	Site observation at Tennamaram POM					
	P1, P2, P3, P4, P5, P6, P7					
	Laws and regulations					
	Interview with workers, contractors etc.	/	1			
	Social aspects -SIA, management plan & implementation, workers' quarters,					
	Stakeholder consultation with affected communities					
0.00 40.00	Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Class to a section to Transport of T					
9.30am – 12.30pm	Site observation to Tennamaram Estate					
	P2, P3, P6, P7					
	Occupational safety & health aspects , chemical management Fourteement Occupational safety & health aspects , chemical management			1	1	
	 Environment, Occupational safety & health aspects, chemical management Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, 					
	IPM New planting					
12.30pm – 1.30pm	Lunch Break					
1.30pm – 5.00pm	Continue assessment at respective sites	,	,	,	,	
Date / Time	Coverage of assessment / Activity / Site	MRS	MZK	RAR	RA	SK
Day 2 – 19/11/2019	Site observation at Tennamaram Estate		101211	10.00	101	J. C
8.30am – 1.00pm	P1, P2, P3, P4, P5, P6, P7					
	Laws and regulations					
	Interview with workers, contractors etc.	1	1			
	Social aspects -SIA, management plan & implementation, workers' quarters,					
	Stakeholder consultation with affected communities					
	 Interview with gender committee, safety committee, worker representative, contractors, supplier, etc 					
	Site observation to Sungei Buloh Estate					
	P2, P3, P6, P7					
	Laws and regulations				1	
	Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching,					
	IPM New planting					
	Site observation to Bukit Talang Estate					
	P2, P3, P6, P7					
	Laws and regulations			/		
	Occupational safety & health aspects , chemical management					
	Environment, Occupational safety & health aspects, chemical management				1	Ī

1.00pm - 2.00pm	Lunch Break					
2.00pm – 5.00pm	Continue assessment at respective site	1	1	1	1	
Date / Time	Coverage of assessment / Activity / Site	MRS	MZK	RAR	RA	SK
Day 3 – 20/11/2019 8.30am – 1.00pm	Site observation at Bukit Talang Estate P1, P2, P3, P4, P5, P6, P7 Laws and regulations Interview with workers, contractors etc. Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities	,				
	 Interview with gender committee, safety committee, worker representative, contractors, supplier, etc Site observation at Tennamaram Estate P1, P2, P3, P4, P5, P6, P7 Laws and regulations Interview with workers, contractors etc. Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities Interview with gender committee, safety committee, worker representative, contractors, supplier, etc 		,			
	Site observation to Sungei Buloh Estate P2, P3, P6, P7 Laws and regulations Coccupational safety & health aspects, chemical management Environment, Occupational safety & health aspects, chemical management Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, IPM New planting			1	1	
1.00pm – 2.00pm	Lunch Break					
2.00pm - 5.00pm	Continue assessment at respective site	1	1	1	1	
Date / Time	Coverage of assessment / Activity / Site	MRS	MZK	RAR	RA	SK
Day 4 – 21/11/2019 8.30am – 1.00pm	Site observation at Sungei Buloh Estate P1, P2, P3, P4, P5, P6, P7 Laws and regulations Interview with workers, contractors etc. Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities Interview with gender committee, safety committee, worker representative, contractors, supplier, etc	1				
	Site observation at Bukit Talang Estate P1, P2, P3, P4, P5, P6, P7 Laws and regulations Interview with workers, contractors etc. Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities Interview with gender committee, safety committee, worker representative, contractors, supplier, etc		1			
	Site observation to Bukit Talang Estate P2, P3, P6, P7 Laws and regulations Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, IPM New planting				1	
	Site observation to Tennamaram POM P2, P3, P6, P7 & Supply Chain			1		

	Laws and regulations					
	Occupational safety & health aspects , chemical management					
	Environment, Occupational safety & health aspects, chemical management					
	Lunch Break					
2.00pm – 5.00pm	Continue assessment at respective site	1	1	1	1	
	Coverage of assessment / Activity / Site	MRS	MZK	RAR	RA	SK
	Site observation at Sungei Buloh Estate					
8.30am – 1.00pm	P1, P2, P3, P4, P5, P6, P7					
	Laws and regulations					
	Interview with workers, contractors etc.	1	1			
	Social aspects -SIA, management plan & implementation, workers' quarters,					
	Stakeholder consultation with affected communities					
	 Interview with gender committee, safety committee, worker representative, contractors, supplier, etc 					
	Site observation to Tennamaram POM					
	P2, P3, P6, P7 & Supply Chain					
	Laws and regulations					
	Occupational safety & health aspects , chemical management					
	Environment, Occupational safety & health aspects, chemical management			1		1
	Site visit and assessment on Supply Chain Implementation including the Model used: General Chain of Custody System					
	Requirements for the supply chain					
	 Documented procedures, Purchasing and goods in, Outsourcing activity, Sales and goods out, Processing, Records keeping, 					
	Registration, Training, Claims, Internal Audit, Management Review.					
	Site observation to Bukit Talang Estate					
	P2, P3, P6, P7					
	Laws and regulations				1	
	 Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, 					
	IPM New planting					
1.00pm – 2.30 pm	Lunch Break/Friday prayer					
2.30pm -3.00pm	Continue assessment at respective site	1	1	1	1	
3.00 pm – 4.00 pm	Audit Team Discussion	1	1	1	1	
4.00pm – 5.00pm	Closing meeting	1	1	1	1	

Attachment 3

RSPO P&C AUDIT CHECKLIST AND FINDINGS (MYNI 2019 FOR RSPO P&C 2018)

Principle 1: Behave ethically and transparently

Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	Yes	SDPSB continued to use the network to disseminate public information relating to land titles, human rights, FPIC, safety and health plans, pollution prevention plans and the procedure for complaints and grievances. The SDPSB website address is http://www.simedarbyplantation.com/ .
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	Yes	Available in English and SDPSB website address is http://www.simedarbyplantation.com/ , accessible to public.
and legal issues relevant to RSPO Criteria, in	1.1.3 (C) Records of requests for information and responses are maintained.	Yes	All 3 Estates and Mill continued to maintain the records of requests for information and responses are maintained which included the government agencies, schools, local communities, etc.
appropriate languages and forms to allow for effective participation in decision making.	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	Yes	SOU Tennamaram continued to implement the communication procedure and maintain records on requests for informationThe procedure was made available on the notice boards in the Estate and Mill offices and Muster Grounds.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	Yes	All 3 Estates and Mill continued to maintain the stakeholders information (address, contact number, nominated representatives).
1.2 The unit of certification commits to ethical conduct in	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	Yes	Available.
all business operations and transactions.	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	Yes	In addition, SDPSB also has a Vendor COBC which has been developed to outline the standards of behaviour required by Sime Darby Berhad's vendors which includes expectation to uphold human rights, including but not limited to modern day slavery and human trafficking.

<u>Principle 2: Operate legally and respect rights</u>
Implement legal requirements as the basic principles of operation in any jurisdiction.

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable	2.1.1 (C) The unit of certification complies with applicable legal requirements.	Yes	Generally, Tennamaram CU has continued to comply with all applicable local, national and ratified international laws and regulations. The legal register has been updated accordingly. Relevant licences and permits were verified at site.
local, national and ratified international laws and regulations.	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	No	The CU had 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' (LORR). The PSQM Department is responsible to track changes and the information was disseminated to all its estates and mills. However, it was found that the implementation of the SOP- regarding the PPE replacement was not effectively implemented at Tennamaram Estate as follows: 1. During interview with group of harvester / pruner and general workers (local and foreigner), they have informed that their safety boot (wellington boot) will only be replaced once a year. 2. Verified the last issuance of safety boot for the group of pruner and general workers was in October 2018. Thus, a Minor NCR RAR 01 2019 was raised.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	Yes	Auditor has verified the boundary stone and pegs at Tennamaram, Sungei Buloh estate and Bukit Talang Estate. The boundary pegs/ trenching were visible along the boundary adjacent to another plantation area.
2.2 All contractors	2.2.1 A list of contracted parties is maintained.	Yes	A list of contracted parties is maintained.
providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	Yes	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements as verified through Online Vendor Registration (OVR) and the Vendor Code of Business Conduct (VCOBC) which apply to all contractors for due diligence and meeting legal requirements. Evidence of legal due diligence of all contracted third parties were made available during the audit.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	Yes	All contracts, including those for FFB suppliers, FFB transporters, CPO transporters, hardware suppliers, Indonesian and the Indian recruitment agencies; contained clauses disallowing child, forced and trafficked labour as verified by audit team.

Clause	Indicators	Comply Yes/No	Findings
2.3 All FFB supplies from outside the unit of certification are from legal sources.	 2.3.1 (C) For all directly sourced FFB, the mill requires: Information on geo-location of FFB origins. Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license 	Yes	Fresh Fruit Bunches are supplied from SDPB owned estates which are certified to RSPO. There is no third-party FFB sent to the mil.
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	Yes	Fresh Fruit Bunches are supplied from SDPB owned estates which are certified to RSPO. There is no third-party FFB sent to the mil.

Principle 3: Optimise productivity, efficiency, positive impacts and resilience

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	Yes	All 3 estates visited maintained to have minimum 4 years' business plans. The budget allocations at estates, include activities for operating expenditure i.e. upkeep, cultivation, harvesting & evacuation, welfare, other than that, capital expenditure, RSPO compliance, etc. Attention was given to crop projection, cost of production, cost per ton and per hectare indicators to monitor the performance of each operating unit. The cost of production was reviewed and compared against expenditure each year with projections in place for future years. While, provisions at mill, include the activities for milling process, general charges, RSPO compliance and capital expenditure.
economic and financial viability.	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	Yes	Replanting program was tabulated annually consistence with business plans reviewed. The decision for replanting was guided by Agricultural Reference Manual (ARM), agronomy department and approved by Plantation Monitoring Unit (PMU).
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Yes	The management review meeting for SOU 6 Tennamaram which were held on 5/11/2019 attended by all the managers in SOU 6. It was chaired by SOU 6 Chairman, Sungai Buloh Manager.
3.2 The unit of certification regularly	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and	Yes	The management documents in relation to environmental plans and impact assessments implemented were made available and maintained at all audited operating units.

Clause	Indicators	Comply Yes/No	Findings
monitors and reviews their economic, social	environmental impacts and opportunities of the unit of certification.		
and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	Yes	The annual reports (ACOP) are submitted to the RSPO Secretariat as the RSPO metrics template was not yet finalized during the conduct of audit: https://rspo.org/view-acop-pdf/oil-palm-growers/Sime Darby Plantation Berhad-ACOP2018.pdf
3.3 Operating procedures are appropriately	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	Yes	SOU Tennamaram continued to use and implement SOPs for each of the processes. Brief version of the SOPs was displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOPs.
documented, consistently implemented and monitored.	3.3.2 A mechanism to check consistent implementation of procedures is in place.	No	There are several mechanisms used to check on consistent implementation of procedures. One of the regular mechanisms used by Tennamaram CU are internal audits conducted by PSQM. Even with the existing mechanism, it was found that the salary deductions for 2 employees in Tennamaram estate were exceeding 50% of their total Oct 2019 salary. Thus, a Minor NCR MZK 01 2019 was raised.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	Yes	Records of monitoring and actions taken by the estates continued to be maintained. This is to ensure that the established procedures were consistently implemented. Records of monitoring and actions taken by all 3 estates were maintained and kept for a minimum of 12 months.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, social & environmental management and	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	Yes	A Social Impact Assessment (SIA) covering 3 operating units namely Tennamaram Estate, Bukit Talang Estate and Sg Buloh Estate was carried out from 17 – 19/6/2014 by the PSQM Unit of the Sime Darby Plantation. The SIA for the Tennamaram Palm Oil Mill on the other hand was carried out in March 2013 with the participation of internal and external stakeholders, namely workers, union, contractors, suppliers, local community, local government and private entities. Records of meetings with the relevant stakeholders were duly documented and sighted during this Surveillance Audit. Documents are maintained as sighted above with latest review on 18/08/2018. The SOU has prepared an Addendum Social Impact Assessment (SIA) on Replanting Activity for Sungei Buloh Estate due to replanting activity at Main Division, Selangor River Division. The assessment was conducted on 17/7/2019.
monitoring plan is implemented and regularly updated in ongoing operations.	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	Yes	The Action Plans for all units within SOU 6 Tennamaram were reviewed at least once a year. Additionally, the Social Management Plan of Sg Buloh Estate and Bukit Talang Estate dated 1/11/2019 was reviewed with the participation of its stakeholders. Areas of concern/key findings were identified together with the action plan, person in charge and respective completion date. There is evidence that the areas of concern/key findings were developed with the consultation of affected parties.

Clause	Indicators	Comply Yes/No	Findings
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	Yes	The social and environmental management and monitoring plan were reviewed at least once a year. It has been updated as at 1/11/2019, with participation of its stakeholders.
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are doc and made available to the workers and their representatives where applicable.	Yes	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives.
	3.5.2 Employment procedures are implemented, and records are maintained.	Yes	Employment procedures were implemented and records were maintained. Audit team has verified all new recruitment workers from Indonesia and India through personal file by employment no. / name of employee, employment contract, offer letter, passport consent form. etc.
3.6 An occupational health and safety (H&S) plan is	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	Yes	Safety procedure has been established to assists CU related to implementation on i.e. ESH compliance management and Pictorial Safety Standard. Among the objective of the procedure to ensure CU compliance with all the regulation and minimize the risk of noncompliance.
documented, effectively communicated and implemented.	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	Yes	The effectiveness of implementation health & safety plan has been monitored by daily basis. All the precaution i.e. safety signboard, pictorial safety standards, PPE, etc has been published and display at workplace areas (notice board, muster call, etc). CU also monitored safety risk in workplace operation by monthly basis. Sighted evidence of workplace inspection has been carried out accordingly.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	Yes	Formal training programmes for 2019 that covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs were available for all the audited sites. Training Plan was for each operating units were established. A training need identification matrix has been established with target dates for the training identified. The training program includes ESH Legal & Other requirements, Safe handling of electrical equipment, Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000, Accident Investigation Techniques, Milling Activities Training, Social Training, HCV/Bio D Training etc
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	Yes	Tennamaram SOU continued to train its executives, staff and workers. Records of training were kept in the training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the SCCS. Training is specific and relevant to the task(s) performed.	Yes	RSPO and RSPO (SCCS) training is provided to all personnel carrying out the tasks critical to the effective implementation of the system on 26/6/2019.

SUPPLY CHAIN REQUIREMENTS FOR MILLS

<u>Disclaimer text:</u> The following section is taken verbatim from the RSPO Supply Chain Certification Standard (14 June 2017) (RSPO SCCS), general requirements as well as modules D & E for mills. The RSPO SCCS is the document in vigour for these requirements and should be referred to in any cases of uncertainty. Any references to other modules or sections contained in the table below, refer to the RSPO SCCS document. As per RSPO SCCS, all requirements are major Indicators (i.e. equivalent of critical Indicators in P&C 2018).

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
Definition Identity Preserved Mill D.1	A mill is deemed to be IP if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO P&C, or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.	Yes	Tennamaram Palm Oil Mill (TPOM) sourced for their FFB only from estates under the same SOU 6 which involve Tennamaram estate, Sungai Buloh estate and Bukit Talang estate. They also receive diverted certified crop from SOU 7 – Bukit Cheraka and Bukit Kerayong estates. The diversion was made in accordance to guideline in Standard Operating Procedure (SOP) for Sustainable Supply Chain & Traceability under the Sustainable Plantation Management System.
Definition Mass Balance Mill E.1	Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	NA	Not Applicable
Explanation (Volume and product integrity) D.2 E.2	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. For an	Yes	The estimated tonnage for CPO & PK products were provided in this report and also in the client certificate.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	independent mill, the estimated		
	tonnage of CPO and PK products		
	shall be recorded in the RSPO IT		
	platform, supply chain certificate and		
	public summary audit report. This		
	figure represents the total volume of		
	certified oil palm product (CPO and		
	PK) that the certified mill is allowed to		
	deliver in a year. The actual tonnage		
	produced shall then be recorded in		
	each subsequent annual surveillance		
	report.		
	The mill shall also meet all registration and		
	reporting requirements for the appropriate		
	supply chain through the RSPO supply		
	chain managing organisation		
	(RSPO IT platform).		

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
Documented procedures 5.3.1 D.3 E.3	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: Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard. The site shall have documented processing certified and non-certified FFBs.	Yes	TPOM had updated their reference document - Standard Operating Procedure (SOP) for Sustainable Supply Chain & Traceability (version 2, issue 5 dated April 2019 under the Sustainable Plantation Management System. Following are listed item under the SOP which had fully covered the requirements of standards; 3.0 Scope 4.0 Responsibilities 5.0 Control of documents & records 6.0 Delivery of FFB from the estate 7.0 Receiving FFB at the mill 8.0 Process monitoring 9.0 CPO & PK dispatch 10.0 Non- conforming products and/ or documents 11.0 Product claims 12.0 Outsourced contractor 13.0 Training 14.0 Reclassification of mill's supply chain model 15.0 Production volume 16.0 Conversion factors 17.0 Internal audit 18.0 Complaints 19.0 Management review Letter of Appointment as Person in Charge for Environmental/ Quality Management Systems (inclusive of RSPO SCCS) for Assistant Manager dated in Apr 2019 sighted and found adequate.
Internal Audit 5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;	Yes	Para 17 of SOP for Sustainable Supply Chain & Traceability was referred. As such, it is being linked to those of PSQM(HQ) Internal Audit procedure. The internal audit was carried out by SQM (HQ) and Central East RSQM on 26 – 28/8/2019. Few findings had

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. • Effectively implements and maintains the standard requirements within its organisation. • 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 non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.		been brought up and TPOM had acted on it accordingly. Outcomes of internal audit and other matter pertaining to MSPO SCCS system had been reviewed accordingly by the management on 5/11/2019.
Purchasing Goods In 5.4 D.4.1/ D.4.2 D.4.1/E.4.2	The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. The site shall inform the CB immediately if there is a projected overproduction of certified tonnage. The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Yes	Based on verification of data through RSPO IT Platform and those recorded by TPOM, no overproduction occurred. Following are parts of the verified incoming documents from estates which found to be in line with TPOM's internal procedure as well as standard requirements. All the information is adequately presented and traceable.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
Outsourcing Activities 5.5	5.5.1 In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO SCCS. A CPO mill and independent mill cannot outsource processing activities like refining or crushing. This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organisation (not the tank farm manager).	Yes	TPOM had described transportation as their outsourced activity. Contract agreement/ notification (letter for outsourced activity/ addendum agreement) were sighted & found adequate. It had been well acknowledged by the third-party service provider. The transporter had also been listed in contractor list. TPOM did not outsource for their kernel crushing process. The kernel being sold to internal and external buyer (contract-dependent).

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	5.5.2 Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a) The site has legal ownership of all input material to be included in outsourced processes; b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced	Yes	The Annexure 5 of the contract agreement with transported had adequately described on the requirements of the clause with emphasize on providing access to CB towards contractor's operation/ system where necessary and when it is being announced in advance.
	in advance. 5.5.3 The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Yes	List of contractors had been updated accordingly and had included the appointed transporter.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	5.5.4 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 physical handling of RSPO certified oil palm products.	Yes	Not Applicable
Record keeping 5.9	5.9.1 The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO SCCS requirements.	Yes	TPOM was noted to have well-maintained their records and reports covering all aspects of the standard requirements.
	5.9.2 Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Yes	It had been described in their SOP for Sustainable Supply Chain & Traceability that records and reports shall be kept for more than 2 years.
	5.9.3 The organisation 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 12 months.	Yes	Figures for volume purchased (input) and claimed (output) over a period of 12 months (since last audit) was sighted and details as per listed in Table 3 of this report.
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	Yes	RSPO Records for Oil Mills had been updated by relevant personnel and had included the receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK. Their SimeWeigh system also being referred for real-time transaction details as well as daily/monthly summary of their material movements (FFB, CPO, PK, others).
E.5.1	a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material	Yes	Not Applicable

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
Conversion Factors 5.10	accounting system according to conversion ratios stated by RSPO. The site can only deliver MB sales from a positive stock. Positive stock can include product ordered for delivery within 3 months. However, a site is allowed to sell short i.e. product can be sold before it is in stock. 5.10.2 Where applicable, a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organisations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the	Yes	Based on nature of their processing activities, TPOM's conversion factor shall be based on their oil extraction rate (OER) and kernel extraction rate (KER). These rates being monitored on daily basis as part of their process performance evaluation and consolidated at month end.
	RSPO website (www.rspo.org). 5.10.2 Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	Yes	
Processing D.6	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation.	Yes	TPOM shall only receive the RSPO certified FFB which are from Sime Darby's own estates – same SOU or the diversion crop as described in their SOP. Monitoring records titled as "RSPO Records for Oil Mills" has recorded the tonnage of certified FFB and other relevant process details. Verified through SimeWeigh system and random sample of weighbridge tickets, being found that no external FFB intake occurred, hence no downgrade required. Consecutively, it is confirmed that RSPO certified oil palm product is kept separated from those of non- certified during process. As for transport, dedicated tankers had been allocated by service provider to prevent cross contamination.

Ref. in RSPO SCCS	Indicators	Comply Yes/No		Findings
Sales and goods out 5.6	5.6.1 The supplying site shall ensure that the following minimum info for RSPO certified products is made	Yes	Since last audit, TPOM has handled the RSPO Supply Chain Model: Identity	following transaction;
5.6	available in document form: The name and address of the buyer;		Preserved	Total (MT)
	The name and address of the seller;		CPO delivered as RSPO certified	26,612.77
	The loading or shipment / delivery date;		PK delivered as RSPO certified Among the sighted documented related	3,666.41
	 date; The date on which the documents were issued; A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; Supply chain certificate number of the seller; A unique identification number. Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of 			to their delivery of products are as followed and a has been presented accordingly with emphasize thain certificate number for TPOM.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
Registration of Transactions 5.7	5.7.1 Supply chain actors who: are mills, traders, crushers and refineries; and take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.	Yes	TPOM through Global Trade Marketing (GTM) personnel updated the RSPO IT platform system upon confirmed contract, normally completed via the system within 3-month period after shipment or within the duration agreed by Mill's respective customer/ buyer. GTM updated the system based on input provided by TPOM (e.g of input Projected & Actual FFB Processed template, RSPO Records for Oil Mills, daily production summary report, monthly production summary report etc.)
	5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform.	Yes	
	The declaration time to do Shipping Announcement / Announcement is based on members' own standard operating procedures. Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. Confirm: Acknowledge the purchase of		

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	RSPO certified volume by confirming		
	Shipping Announcements /		
	Announcements.		
Claims 5.11	5.11.1 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 Market Communications & Claims.	Yes	As part of the business to business communications, TPOM has clearly made their claim by indicating the correct product name, applicable supply chain model (Identity Preserve) as well as their RSPO Supply Chain certificate number on the relevant outgoing documents to customer. It was also noted that TPOM had not made use of any certification mark, RSPO logo and trademark and accreditation mark.

<u>Principle 4: Respect community and human rights and deliver benefits</u> Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is doc & comm to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, incl contracted security forces.	Yes	The policy to respect human rights was documented in the Human Rights Charter - http://www.simedarbyplantation.com/sustainability/human-rights-charter . This Policy states among others, that it will develop its businesses with a sense of humanity, ensuring that they are socially beneficial and do not infringe basic human rights.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	Yes	It has been verified that the land is now legitimately owned by SOU Tennamaram since since July 1924. The audit team had confirmed that there were no land issues related to previous owners.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective,timely,appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons&whistleblowers, where requested, without risk of reprisal or intimidationfollows the RSPO policy on respect for HRD.	Yes	The system used by the SOU 6 Tennamaram in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Tatacara Perundingan Dalam Menangani Masalah Sosial". The Mill and Estates within SOU 6 each has its own Internal Complaint Book and External Communication Book. The Internal Complaint Books are for employees to lodge complaint pertaining to their houses. The external book was reviewed and found no complaints against the CU. When ensuring anonymity of complainants and whistleblowers, the Sime Darby Code of Business Conduct provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ.

Clause	Indicators	Comply Yes/No	Findings
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Yes	Based on interview with stakeholders, it was concluded that the system were understood by the affected parties.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, incl against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	Yes	The Tennamaram CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders through stakeholders meeting.
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	Yes	The system used by the SOU 6 Tennamaram in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Tatacara Perundingan Dalam Menangani Masalah Sosial". The conflict resolution mechanism includes the option of access to independent legal and technical advice. The complainants may choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.
4.3 The unit of certification contributes to local sustainable dev as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	Yes	Contributions to community development that are based on the results of consultation with local communities are demonstrated such as employing workers/staff selected from within the nearby villages and settlements and donations.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a FPIC process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	Yes	Evidence of legal ownership of the land including history of land tenure was verified during this audit. For Tennamaram, Sungei Buloh and Bukit Talang Estate the land was previously owned by Kumpulan Guthrie Berhad and Golden Hope. It was then transferred to Sime Darby after the merger in 2007. Kumpulan Guthrie Berhad and Golden Hope has bought the land from Selangor State government since July 1924.
consent.	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Tennamaram since July 1924. The audit team had confirmed that there were no land issues related to previous owners. It was concluded that there was no evidence of agreement-making process at SOU Tennamaram.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Tennamaram since July 1924. The audit team had confirmed that there were no land issues related to previous owners. Hence this is indicator was not applicable.

Clause	Indicators	Comply Yes/No	Findings
	gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.		
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Tennamaram since July 1924. The audit team had confirmed that there were no land issues related to previous owners.
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Tennamaram since July 1924. The audit team had confirmed that there were no land issues related to previous owners. From the interviews, it can be concluded that there was no operations on villagers land at SOU Tennamaram.
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Tennamaram since July 1924. The audit team had confirmed that there were no land issues related to previous owners. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	Yes	This requirement in this indicator does not apply to SOU Tennamaram.
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Yes	This requirement in this indicator does not apply to SOU Tennamaram.

Clause	Indicators	Comply Yes/No	Findings
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	Yes	This requirement in this indicator does not apply to SOU Tennamaram.
4.5 No new plantings are established on local peoples' land where	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	Yes	This is available in Social Impact Assessment (SIA) Report for SOU 6 Tennamaram. There was no new plantings established on local peoples' land. It has also been verified that the land is legitimately owned by SOU Tennamaram since July 1924. The audit team had confirmed that there were no land issues related to previous owners.
it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Tennamaram since July 1924. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. The audit team had confirmed that there were no land issues related to previous owners.
representative institutions.	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Tennamaram since July 1924. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. The audit team had confirmed that there were no land issues related to previous owners.
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory landuse planning with local peoples, the full range of food and water provisioning options are considered. There is	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Tennamaram since July 1924. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. The audit team had confirmed that there were no land issues related to previous owners.

Clause	Indicators	Comply Yes/No	Findings
	transparency of the land allocation proc.		
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Tennamaram since July 1924. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding the previous land owner, the villagers, local community and neighbouring estate.
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Tennamaram since July 1924. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding the previous land owner, the villagers, local community and neighbouring estate.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	Yes	There was no new lands acquired for plantation and mills after 15/11/2018. The current operation area including mill and estates as per stated in the land title.
4.6 Any negotiations concerning compensation for	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	Yes	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System document entitled "Procedures for Handling Boundaries Disputes".
loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established&implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	Yes	In accordance with the 'Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established.
stakeholders to express their views through their own representative	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	Yes	There was no scheme small holdings at Tennamaram SOU. The Fresh Fruit Bunches are supplied from SDPB owned estates which are certified to RSPO.

Clause	Indicators	Comply Yes/No	Findings
institutions.	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	Yes	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	Yes	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System entitled "Procedures for Handling Boundaries Disputes". In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
compensated for any agreed land acquisitions and relinquishment of rights, subject to their	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	Yes	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighboring estate.
FPIC and negotiated agreements.	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	Yes	It has been verified that the land is legitimately owned by SOU Tennamaram since July 1924. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
4.8 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	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	Yes	It has been verified that the land is legitimately owned by SOU Tennamaram since July 1924. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
rights.	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly	Yes	From the interviews, it can be concluded that there was no land conflict at SOU Tennamaram.

Clause	Indicators	Comply Yes/No	Findings
	acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.		
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).	Yes	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities where applicable).	Yes	There was no conflict or dispute over the land.

<u>Principle 5: Support smallholder inclusion</u>
Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Yes	Fresh Fruit Bunches were supplied from SDPB owned estates (Tennamaram, Bukit Talang & Sungei Buloh Estate) which are certified to RSPO. There was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
fairly and transparently with all smallholders (Independent and	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Yes	Fresh Fruit Bunches were supplied from SDPB owned estates (Tennamaram, Bukit Talang & Sungei Buloh Estate) which are certified to RSPO. There was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
Scheme) and other local businesses.	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	Fresh Fruit Bunches were supplied from SDPB owned estates (Tennamaram, Bukit Talang & Sungei Buloh Estate) which are certified to RSPO. There was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
	5.1.4 (C) Evidence is available that all parties, including women and independent	Yes	Fresh Fruit Bunches were supplied from SDPB owned estates (Tennamaram, Bukit Talang & Sungei Buloh Estate) which are certified to RSPO. There was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.

Clause	Indicators	Comply Yes/No	Findings
	representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.		
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	Yes	There is an existing contract with these contractors representatives had confirmed their understanding of their rights and obligations under the contract. Both contractors confirmed the fairness of the terms of their contract, and payments are usually received within 7 to 10 days of invoice issuance.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Yes	These contractors interviewed confirmed that payments are made in a timely manner, namely within 7 to 10 days of invoice
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Yes	Weighing Equipment in Tennamaram POM has been calibrated in 6 monthly basis using Metrology Corporation Malaysia Sdn Bhd.
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	Yes	Sime Darby Plantation supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. However, in SOU Tennamaram, Fresh Fruit Bunches are supplied from SDPB owned estates (Tennamaram, Bukit Talang, Sungei Buloh) which are certified to RSPO. There is no third-party FFB sent to the mill.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	Yes	A grievance mechanism which respects anonymity and protects complainants is in place at the SOU Tennamaram as per the SOM Procedure for External Communication and as per SOP Carta Aliran Pengendalian Isu Sosial.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	Yes	Sime Darby Plantation supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. However, in SOU Tennamaram, Fresh Fruit Bunches are supplied from SDPB owned estates (Tennamaram, Bukit Talang, Sungei Buloh) which are certified to RSPO. There is

Clause	Indicators	Comply Yes/No	Findings
sustainable palm oil			no third-party FFB sent to the mill.
value chains.	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	Yes	Sime Darby Plantation supports Independent Smallholders to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder). Noted that SOU Tennamaram has invited nearby smallholders to attend the Stakeholder meeting scheduled in Dec 2019 to promote on RSPO certification.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	Sime Darby Plantation supports Independent Smallholders to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder). Noted that SOU Tennamaram has invited nearby smallholders to attend the Stakeholder meeting scheduled in Dec 2019 to promote on RSPO certification.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Yes	Fresh Fruit Bunches were supplied from SDPB owned estates (Tennamaram, Bukit Talang, Sungei Buloh) which are certified to RSPO. There is no third-party FFB or scheme smallholders sent to the mill.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Yes	Fresh Fruit Bunches were supplied from SDPB owned estates (Tennamaram, Bukit Talang, Sungei Buloh) which are certified to RSPO. There is no third-party FFB or scheme smallholders sent to the mill.

<u>Principle 6: Respect workers' rights and conditions</u>
Protect workers' rights and ensure safe and decent working conditions.

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	Yes	The equal opportunities policy is contained within the Sime Darby Social Policy stated 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.
	6.1.2 (C) Evidence is provided that workers and groups including local communities,	Yes	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,

Clause	Indicators	Comply Yes/No	Findings
	women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.		or group of employees. As confirmed by the workers during interviews and field observation, payment of wages/salaries, provision of housing and access to benefits and amenities is fair based on observation, review of pay checks, contracts of employment, and interviews of staff, local and foreign workers. Foreign workers are also accorded the same living standards and accommodations as local workers.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	Yes	Based on interviews with the estate and mill management including 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.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	Yes	Currently, there was no pregnant women at SOU Tennamaram as verified with medical assistant and during interview session with women workers. There is also no evidence of discrimination against any employee, or group of employees including pregnant women.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	Yes	At the Tennamaram POM, Gender Committee was formed since 2008, sighted also Sime Darby has Manual on Implementation of The Gender Policy. Latest Meeting has been held in Sept 2019 The topics cover, among other things, policy, functions of the Gender Committee.
	6.1.6 There is evidence of equal pay for the same work scope.	Yes	The equal opportunities policy is contained within the Sime Darby Social Policy 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.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	Yes	For the SOU 6 Tennamaram documentation of pay is in the form of monthly pay slips. Conditions of pay are contained in the workers' respective employment contracts. Samples of the monthy pay slips and employment contracts were made available and reviewed during the audit. Labour laws, union and/or other collective agreements detailing payments and other conditions, was made available in the languages understood by the workers and explained to them by a management during induction.
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal	Yes	Contracts and conditions of employment are contained in employment contracts signed between the Mill and respective estates on one hand, and their workers on the other. The employment contracts sampled were prepared in either Bahasa Indonesia or in dual-language, namely English and the language commonly used in the worker's country of origin. Among others, the contracts defined the period of employment, wage rate, work benefits, overtime, annual leave, public holidays, contract termination, etc. Details on monthly salary and deductions for every worker and staff are reflected in their pay slips

Clause	Indicators	Comply Yes/No	Findings
	requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.		which are issued to the workers during pay day. For the local workers, there is evidence that the payment of statutory contributions such as EPF, SOCSO and Employment Insurance Scheme are being made in accordance with the relevant legal provisions.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	Yes	The SOU Tennamaram has complied with legal requirements and MAPA/NUPW Agreement 2019 on regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	Yes	Visits were made to the workers' housing facilities of each estate reveal that the estates and mill have provide adequate housing to their employees. The houses provided with rent-free, subsidized electricity and water which are available 24 hours a day. The houses are generally well-maintained. They are also furnished with the basic necessities such as cupboard, mattresses, pillows and cooking facilities. Each house has three rooms and accommodate 3 to 6 workers for each house.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	Yes	All units within SOU 6 Tennamaram are located near the towns. Workers have access to adequate, sufficient and affordable food from a grocery shop Bestari Jaya and Ijok, where affordable food are readily available.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following:	Yes	SOU Tennamaram has follow the MAPA/NUPW Agreement 2019 which is payment of the wages following the Minimum Wages Order 2018. As per current situation in Malaysia, all workers in SOU Tennamaram has been paid by following the Minimum Wages Order 2018. Prevailing wages has been calculated for SOU Tennamaram accordingly.

Clause	Indicators	Comply Yes/No	Findings
	 An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. There is annual progress on the implementation of living wages Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. The unit of certification may choose to implement the "living wage" payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation Until such time where the Malaysian version of "decent living wage" has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid. 		
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	Yes	All workers in SOU Tennamaram is a Permanent and full time workers and all the workers used for core work such as Harvesting, Manuring, Spraying, Milling Operation, Grading, Engine driver and workshop. There is no temporary workers and contractors use in the SOU Tennamaram.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively.	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	Yes	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 is applicable throughout all operating units and is printed and translated in Bahasa Malaysia and were seen being displayed on all the office notice boards and at AP posts. NUPW membership is open to all workers including foreign workers.
Where the right to	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers	Yes	The National Union Plantation Workers (NUPW) is the union that represents workers of SOU 6 Tennamaram. Union membership is open to both local and foreign workers and

Clause	Indicators	Comply Yes/No	Findings
freedom of assoc. and collective bargaining are restricted under law,	representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.		the workers representative elected by the NUPW/MAPA itself which is independent party.
the employer facilitates parallel means of ind. & free association and bargaining for all such personnel.	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	Yes	The National Union Plantation Workers (NUPW) is the union that represents workers of SOU 6 Tennamaram. The Workers Representative in the Union is selected by workers themselves.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	Yes	The policy on protection of children is contained in the Sime Darby Child Protection Policy. There was no evidence that the estates and the mill at SOU Tennamaram has employed anyone below the age of 18 years.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	Yes	There was no evidence that the estates and the mill at SOU Tennamaram has employed anyone below the age of 18 years. Auditor also verified through the contractors in the SOU Tennamaram and confirmed there was no contractor workers available in the estate and mill.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	Yes	There was no evidence that the estates and the mill at SOU Tennamaram has employed anyone below the age of 18 years or young persons.
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	Yes	The policy protection of children is contained in the Sime Darby Child Protection Policy dated January 2015. There was no evidence that the estates and the mill at SOU Tennamaram employ anyone below the age of 18 years.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	Yes	The policy to prevent sexual and other forms of violence is contained in the Sime Darby Social Policy. In addition, awareness on sexual and other forms of harassments are also briefed during muster and Gender Committee meetings held at each Mill and Estates. The Gender Committee Meetings are being held regularly where topics discussed include sexual harassment and violence. Members to lodge complaints if members encounter such incidence. Interviews with female employees confirmed their understanding of what constitutes sexual harassment.

Clause	Indicators	Comply Yes/No	Findings
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	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. Awareness on reproductive rights are also briefed during muster and Gender Committee meetings held at each Mill and Estates.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	Yes	In the SOU Tennamaram, Gender Committee have been established at the Mill and Estate levels to help disseminate awareness on issues relating to reproductive rights and need of new mothers. Awareness on reproductive rights need of new mothers are also briefed during muster and Gender Committee meetings held at each Mill and Estates.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	Yes	A grievance mechanism which respects anonymity and protects complainants is in place at the CU as per the Sime Darby Gender Committee Handbook. The procedures have been communicated to all levels of workforce.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty to the workers for termination of employment Debt bondage Withholding of wages	Yes	All workers in SOU Tennamaram in Estate and Mill have entered into employment voluntarily, it was verify during the interview with Indonesian and Indian workers. The workers know they will work in Oil Palm Sector since from their country. The mill and all visited estates had given passport to foreign workers as verified during interviewed with the workers. However, the foreign workers have requested the office to keep their passport due to safety reason without any force from Sime Darby SOU Tennamaram management as verified through 'Consent for Passport Safekeeping. Foreign workers also are freely to take back their passport after filling in 'Borang Pengambilan Passport'. All the passport are stored in the safe locker in manager office with name of worker, passport number. Workers also confirmed there is no involuntary overtime as they will work for overtime if management ask to, they also understand their contract which is they resign from sime darby which is prior to 8 weeks of notice and they also don't have debt of bondage.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	Yes	The SOU 6 Tennamaram adopts the Social Policy stated that "All employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work and representation race, caste, nationality". There is also a procedure entitled "Sourcing Process for Foreign Workers".
6.7	6.7.1 (C) The responsible person(s) for	Yes	All the Estates / Mill Managers were appointed as the Chairman of the ESH committee.

Clause	Indicators	Comply Yes/No	Findings
The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.		The Manager subsequently assigned duties of ESH coordinator to the Assistants or healthcare assistant for the down line implementation of ESH practices in the estates. All identified Executives were officially given a letter for such an appointment. All estates and the mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. Workers during the meeting participated in the discussion mainly on line site and safety. All units adopted the agenda as released PSQM. This agenda list was sighted and adequate to discuss salient issues relating safety, environmental and health.
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	Yes	Accident and emergency procedures are available in adherence to the SPSB policy on 'Crisis Management & Emergency Response' plan - chapter 13 of PQMS, OSH manual and "Accident and Reporting and Investigation Procedure' in chapter 14 of the same manual. Each estates and mill had procedures emergencies situation as listed below in the table. There were formation of ERP Team & ERP for all the identified incidences. The organisation chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were produced by PSQM and amended to tailor to the situation differences in the estates and mills. The trained personnel for the First Aid were among the employees working in the mill on shift and also the estates staff/mandores. The first aid boxes were available at various points in the mill complex including laboratory, office, workshop, process control room etc. Similarly the estates distributed the first aid box to the mandores and brought along to the field during operations. In addition there are also first aid boxes kept in the office, store and workshops. Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKKP 8. Records are kept in the office. Summary for the year is described in the JKKP 8 a mandatory requirement for submission to DOSH by Jan of the subsequent year. Where required submissions of JKKP 6, 7 & 8 to DOSH were compiled under the legislative requirement. Investigations and revision of HIRARC where appropriate were made accordingly.
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	Yes	All workers involved in potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting were provided with appropriate PPE and replaced when damaged. PPE issue and replacements 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. Sanitation facilities for spraying and manuring operator was available at the store area with facilities such as shower room, washing machine, PPE rack, soap, etc. All the workers are understood and aware related to SOP after chemical application.

Clause	Indicators	Comply Yes/No	Findings
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	Yes	The Mill and Estates provide medical care and insurance coverage for all the workers. Random records checked confirmed that the Local Workers and foreign workers – covered by SOCSO and FWCS. Verified through 'Jadual Caruman Bulanan' Borang 8A – and monthly payment. In addition, the estates and mill provide medical care to all workers using own Medical Assistant services. Cases requiring additional/serious treatment are referred to Hospital Tanjung Karang 30 km away.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	Yes	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKKP 8 a mandatory requirement for submission to DOSH by Jan of the subsequent year.

<u>Principle 7: Protect, conserve and enhance ecosystems and the environment</u>

Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	Yes	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 Cassia cobanensis, Antigonan leptopus and Turnera sublata and for rhino beetles is by using pheromone trap. All estates carried out monthly detection and observation of leaf eating pests, rat damage and diseases like Ganoderma. These detection and observations were carried by staff. When damaged/disease was observed, proper census was then carried out. Records showed no outbreak had been taken place.
Management (IPM) techniques.	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	Yes	There was no evidence that species referenced in the Global Invasive Species Database and CABI.org are to be used in managed areas, as per site visited and as per the stakeholder consultation with relevant workers.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Yes	As for the annual surveillance visit, there is no use of fire for pest control and no evidence that all the estates have do so.
7.2 Pesticides are used in ways that do not endanger health of	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	Yes	Written justification in Standard Operating Procedure (SOP) of all agrochemical was available. The Manual has included a chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease.

Clause	Indicators	Comply Yes/No	Findings
workers, families, communities or the environment.	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	Yes	All estates continued to have records to show the types of pesticides used with active ingredients and their LD50, where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Yes	All estates continued to minimise the usage of agrochemicals by implementing IPM. Blanket spraying was not practiced by this CU and soft grasses maintained in the field. It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section 15 -Plant Protection.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	Yes	In replants area prophylactic spraying using diluted cypermethrim for immature palms in zero burning of oil palm to oil palm replanting was carried out against Rhinoceros beetles as per SOP.
	7.2.5 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, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:		
	7.2.5a Judgment of the threat and verify why this is a major threat. 7.2.5b Why there is no other alternative which can be used.	Yes	All estates only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register, it was noted that all pesticides used are of class III & class IV. The use of paraquat had been banned in all
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	7.2.5c Which process was applied to verify by there is no other less hazardous SDPSB estates. There was no evidence of pesticides the Health Organization Class 1A or 1B, or that are listed by Conventions had been use.	SDPSB estates. There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions had been use. Acephate, an organophosphate insecticide, was used on Bukit Talang Estate in 2018 for
	7.2.5d What is the process to limit the negative impacts of the application.	Yes	trunk injection to treat bagworm attack. Records of approval to purchase and use Acephate from the Department of Agriculture was verified. From records and interviews
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Yes	with workers, staff and estate assistants, found that they were trained, all precautions taken and all legal requirements met. Signboards indicated 'AWAS Dilarang Masuk', block, dates of operation, type of operation and chemical were used.
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed	Yes	Person who handled chemical such as spraying, and manuring has been given training by the CU and external bodies. It was concluded that they understand safety aspect related to safety on handling.

Clause	Indicators	Comply Yes/No	Findings
	the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.		
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	Yes	The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). Records of purchase, storage and used were maintained. All of the stores were equipped with exhaust fans and the door was secured and keys held by only the store keeper and attendant. Only authorized personnel are allowed to handle the chemicals. All chemicals were segregated and fertilisers were well stacked. Relevant MSDS/CSDS were available in the stores. Empty pesticides containers were triple rinsed, holes punched in them and stored separately in the scheduled wastes store awaiting proper disposal.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Yes	At Tennamaram Estate empty containers chemical has been disposed through programme "empty chemical recycling programme" approved by Jabatan Pertanian Baqhagian Kawalan Racun Perosak. The scheduled waste was disposed the approved DOE licensed contractor.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	Yes	There was no aerial spraying practiced in the Tennmaram SOU.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Yes	The specific annual medical surveillance has been carried out accordingly.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	Yes	All estates complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation whereby no work with pesticides is given to pregnant or breast-feeding women.

Clause	Indicators	Comply Yes/No	Findings
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	Yes	SOU Tennamaram has identified all wastes and sources of pollution. The Waste Management Action Plan FY 2019 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were: • Air – sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping – biogas emission) – GHG. • Water – cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blowdown. • Land – scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste. Action taken: • Air emission has been controlled by mill by installed the ESP to captured particulate emission from boiler emission • Final discharge water has been monitored by monthly basis by accredited laboratory and reported to DOE. • SW has been disposed through DOE contractor and domestic waste has been disposed through Majlis Daerah Kuala Selangor.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	Yes	At Tennamaram SOU domestic waste for line site and office has been disposed through Majlis Daerah Kuala Selangor 3 times per week.
	7.3.3 The unit of certification does not use open fire for waste disposal.	Yes	During site visit at all units of certification, there was no evidence of open fire has been used for waste disposal. All waste material has been disposed through Majlis Daerah Kuala Selangor.
Practices maintain soil fertility at, or where improve soil	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	Yes	All estates practiced the maintenance of long-term soil fertility by annual application of fertilisers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and some EFB and compost application.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	Yes	Periodic tissue and soil sampling were carried out in the Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitor the changes in the organic carbon and total nitrogen.
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	Yes	All 3 Estates had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of Solid POME. In addition, during replanting, palms were felled, chipped, windrowed and left to decompose.

Clause	Indicators	Comply Yes/No	Findings
	7.4.4 Records of fertiliser inputs are maintained.	Yes	Fertilizer application program was monitored using the program sheets, bin cards, field cost book, etc. Records of programs and applications of fertilizers were made available to auditors. From the review of the records, noted that the actual fertilizer application for 2018 and 2019 was in line with the recommendation.
7.5 Practices minimise and control erosion	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	Yes	New soils maps prepared in Nov 2018 Precision Agriculture Unit (NHM) of Sime Darby Research unit shows that there are no fragile soils in all Estates. Peat soils areas shown in previous maps is now confirmed as non-peat soils.
and degradation of soils.	7.5.2 No replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	Yes	It was confirmed through topography map that no replanting on the steep terrain (greater than 25°) larger than 25 ha within the Tennamaram Unit Certification.
	7.5.3 There is no new planting of oil palm on steep terrain.	Yes	Auditors has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all four estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at SOU Tennamaram.
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	Yes	New soils maps prepared in November 2018 Precision Agriculture Unit (NHM) of Sime Darby Research unit shows that there are no fragile soils in all Estates. Peat soils areas shown in previous maps is now identified as non-peat soils.
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	Yes	There was no extensive planting on marginal and fragile soils in SOU Tennamaram based on the new soils map provided by Precision Agriculture Unit (NHM) of Sime Darby Research.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Yes	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all four estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at SOU Tennamaram.
7.7 No new planting on peat, regardless of depth after 15	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	Yes	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all four estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at SOU Tennamaram.
November 2018 and all peatlands are managed responsibly.	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 Nov2018) to RSPO Secretariat. PROCEDURAL NOTE:	Yes	It was confirmed through the submission of peat inventory to the RSPO, Tennamaram CU does not have any peat land.

Clause	Indicators	Comply Yes/No	Findings
	Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).		
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	Yes	There was no peat soils in SOU Tennamaram based on the new soils map provided by Precision Agriculture Unit (NHM) of Sime Darby Research
	7.7.4 (C) A documented water and ground cover management programme is in place.	Yes	There was no peat soils in SOU Tennamaram based on the new soils map provided by Precision Agriculture Unit (NHM) of Sime Darby Research
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it ii is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.	Yes	There was no peat soils in SOU Tennamaram based on the new soils map provided by Precision Agriculture Unit (NHM) of Sime Darby Research
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	Yes	There was no peat soils in SOU Tennamaram based on the new soils map provided by Precision Agriculture Unit (NHM) of Sime Darby Research.
	7.7.7 (C) All areas of unplanted and set-	Yes	There was no peat soils in SOU Tennamaram based on the new soils map provided by

Clause	Indicators	Comply Yes/No	Findings
	aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.		Precision Agriculture Unit (NHM) of Sime Darby Research
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	Yes	All estates had in place and implemented water management plans. Plans for 2019 were sighted. The water management plans were tailored towards how to reduce rain water collection, to Improve user awareness and domestic use.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Yes	Based on stakeholder consultation with local communities and field visit, there was evidence that the CU does not restrict access to clean water or contribute to pollution of water used by communities.
	7.8.1b Workers have adequate access to clean water.	Yes	As verified at SOU facilities for workers and through interview with workers, all workers have obtained adequate access to clean water via SYABAS.
	7.8.2 (C) Water courses and wetlands are protected, incl maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (Apr 2017).	Yes	SOU Tennamaram continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management. The signboards were displayed accordingly at the site where applicable.
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially BOD, is regularly monitored.	Yes	Monitoring of the final discharge was carried out on monthly basis. The result was within the limit.
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	Yes	Mill water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis. A slightly higher water usage noted, probably due to the proportionate reduction in volume of FFB being processed in year 2019.
7.9 Efficiency of fossil fuel use and the use	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable	Yes	A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2019.

Clause	Indicators	Comply Yes/No			Findings		
of renewable energy is optimised.	energy is in place, monitored and documented.						
7.10 Plans to reduce pollution and emissions, including	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm	Yes	SOU Tennamaram I Option 2 Summary of Net GH		IG using RSP	O Palm GH0	G calculator and use the
greenhouse gases (GHG), are	GHG calculator and publicly reported.		Emissions per Product			%	
developed,			СРО	0.9	OER	20.02	
implemented and			PK	0.9	KER	5.5	
monitored and new developments are designed to minimise GHG emissions.			Production FFB Processed CPO Produced		7817.73 5489.8		
			Land Use OP planted area OP planted on peat Conservation (forested Conservation (non-fore		Ha 25119.7 ⁻ 0 0	1	
			Total	estea)	25119.7°	1	
			Summary of Field Er	1	<u>(S</u>		
				Own Crop		Group	
			Emissions	tCO2e to	CO2e/tFFB	tCO2e	tCO2e/tFFB
			Land Conversion	69783.7	.28	3310.9	0.39
			*CO2 Emissions from Fertiliser	7119.45 0	.03	468.1	0.05
			**N2O Emissions	10956.43	.04	326.05	0.04
			Fuel Consumption	973.02		56.77	0.02
			Peat Oxidation	31175.62	.13	55.51	0.01
			Sinks				
			Crop Sequestration).28	-3736.36	-0.42
			Conservation	0 0		0	0

Clause	Indicators	Comply Yes/No			Findings			
			Sequestration Total	49550.57	0.17	425.46	0.06	
			Summary of Mill Em Emissions POME Fuel Consumption Grid Electricity Utilisation Credits Export of Grid Electricity	tCO2e 0 115.41 on 1894.3	tCo2e/tFFB 0 0 0 0.01			
			Sales of PKS Sales of EFB Total Palm Oil Mill Effluent Divert to compost Divert to anaerobic digr	0%	0 0.01			
			POME Diverted to A Divert to anaerobic por Divert to methane capt Divert to methane capt (electricity generation)	nd 100° ure (flaring) 0% ure 0%	%			
	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	Yes	Auditors has verified Estate Maps and a observation during development of area for New Development	lso through sit the audit, it is as at Tennama nt was not appli	e visit to the sar confirmed that the gran CU. Hence, I cable.	npled estate here were n RSPO GHG	es areas. Based on new planting on Assessment Proc	on the r new edure
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	Yes	The signifaicants pol – FY 2019.	lutants in the m	nill has been identi	fied in the po	ollution prevention l	Plan

Clause	Indicators	Comply Yes/No	Findings
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	Yes	Tennamaram CU maintain a strict Zero Burning Replanting Technique practiced in relation to all new plantings, replanting or other development which published in their website http://www.simedarbyplantation.com/sustainability/beliefs-progress/practices-key-initiatives/good-agricultural-practices/zero-burning-replanting-technique . Estates visited had not practiced any open burning and there was no evidence to show that fire had been used for preparing land for replanting. Observed trunk was chipped and stacked at inter row and left decomposed at field.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	Yes	The CU had not practiced any open burning and there was no evidence to show that fire had been used for preparing land for replanting activity.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Yes	The CU had not practiced any open burning and there was no evidence to show that fire had been used for preparing land for replanting activity.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest, HCVs and	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	Yes	Auditors has verified through checking through <u>www.globalforestwatch.com</u> , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at SOU Tennamaram since Nov 2005.
HCS forests in the managed area are	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:		
identified and protected or enhanced.	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	Yes	Auditors has verified through checking through <u>www.globalforestwatch.com</u> , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no new land clearing at SOU Tennamaram since Nov 2005.
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into	Yes	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no new land clearing in existing plantations or new plantings at SOU Tennamaram since Nov 2005.

Clause	Indicators	Comply Yes/No	Findings
	account wider landscape-level		
	considerations.		
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).	Yes	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no new land clearing in existing plantations or new plantings at SOU Tennamaram since Nov 2005.
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 Nov 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	Yes	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no new land clearing in existing plantations or new plantings at SOU Tennamaram since Nov 2005.
	7.12.6 All RTE species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	Yes	The CU has conducted assessment on HCV in June 2014. The report titled 'HCV Re-Assessment For Selangor Central Zone: Strategic Operating Unit SOU 6 Tennamaram and SOU 7 Bukit Kerayong' dated December 2015. The Addendum Report for Tennmaram Estate and Bukit Talang Estate dated in Nov 2019 was verified. The total of the HCV area is 2.81 Ha. No RTE species found in the Tennamaram SOU. However SOU Tennamaram still maintain the plan for HCV area.

Clause	Indicators	Comply Yes/No	Findings
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	Yes	Progress of implementation of the action plans 'High Conservation Value (HCV) Management Plan FY2019 for Bukit Talang, Sungei Buloh Estate and Tennamaram Estate' were reviewed and verified on the ground.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	Yes	Auditors has verified through checking through <u>www.globalforestwatch.com</u> , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no new land clearing in existing plantations or new plantings at SOU Tennamaram since Nov 2005.

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Clause	Indicators	Comply Yes/No	Findings
4.5.3 Time-bound plan Note: Where there are isolated lapses in implementation of a time-bound plan, a minor non- compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;	(a) As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	:	SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Indonesia PT Bahari Gembira Ria Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FR SPOCertSearch&file=00P9000001OioYJEAZ PT Sandika Natapalma & PT Budidaya Agro Lestari Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing. As at June 2017, the smallholders with the total of 29,914 Ha (58% from the total Ha, 51,715 Ha) of associated smallholders in Indonesia has been certified. Certification process for the remaining associated smallholder's areas was on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and out growers by end 2020. PT Bersama Sejahtera Sakti The new project at KKPA Maju Bersama by the plasma community is currently in nursery stage and not yet due for harvesting, the year of planting was in 2014. PT Ladang Rumpun Subu Rubadi SAP 1 Estate PLASMA will be undergone 2 nd stage audit on 2019. PT Guthrie Pecconina Sungai Jernih Estate and the KKPA Estates has undergone audit.

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				PT Sime Indo Agro
				Only East estate not yet certified – land legalization still in progress.
				Liberia SDPL has undergone RSPO Main Certification audit scheduled on 19 to 23/3/2018, but the assessment was only completed conducted and put on-hold due to security & safety issue. After due consideration on the current engagement with the House of Representative in Liberia, SDP management decided to postpone the time bound plan of RSPO Certification to 2019 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process. A letter of Request for Extension of RSPO Certification Time Bound Plan for Sime Darby Plantation dated 22/5/2019 was sent to RSPO Secretariat, Head of Certification, and with response to Sime Darby Plantation on 23/5/2019 with no objections on the extension.
				Papua New Guinea (NBPOL) Markham Farming Company Limited (MFCL) / Markham Agro Pte. Ltd. Estimate to be certified on year 2020. The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore, the Remediation and Compensation Procedure will be required to be full filled in order to achieve certification. The Disclosure has been has been initiated on 18.10.18. Currently HCV/HCS, SEIA and LUCA are being undertaken in order to submit and mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration. https://rspo.org/certification/remediation-and-compensation/racp-tracker no 82
	(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 several changes to the current time bound plan as verified during this audit. Liberia has receive and extension of Timebound Plan which is until 2020 and PT Mitra Austral Sejahtera has been sold to PT Inti Nusa Sejahtera Refer letter dated 27/6/2019 to RSPO Secretariat and announcement at Bursa Malaysia http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965 .
	(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-	Yes	Time bound plan was verified by CB and it can be confirmed that there were several changes to the current time bound plan as verified during this audit. Liberia has receive and extension of Timebound Plan which is until 2020 and PT Mitra Austral Sejahtera has been sold to PT Inti Nusa Sejahtera Refer letter dated 27/6/2019 to RSPO Secretariat and announcement at Bursa Malaysia http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965 .

		bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);		
4.5.4 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	Yes	Based on internal and external audit (ISPO certified) there was no replacement of primary forest or HCV areas in the uncertified management unit. Except for NBPOL area which have potential liabilities of RSPO grower members and the stages of the Remediation and Compensation Procedures (RaCP) that the management units (MUs) are currently undergoing. https://rspo.org/certification/remediation-and-compensation/racp-tracker no 82
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6;	Yes	Regular discussion was ongoing between Sime Darby Plantation and the group of community (PAC) through bimonthly 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. https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail However, sighted as at June 2019 TM Mitra Austral Sejahtera has been sold to PT Inti Nusa Sejahtera Refer letter dated 27 June 2019 to RSPO Secretariat and announcement at Bursa Malaysia https://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965
	(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 were not being resolved yet through an agreed process for all uncertified units for all 7 uncertified units of Sime Darby Plantation Sdn Bhd - Indonesia as at June 2019.

(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	Yes	Bas	ed on internal ar	nd external audit (ISF	PO certified) there was no legal non-compliance recorded at the CU.							
(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 4.5.4 (a) – (d) above by the audit team based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:	Yes	ther 201 Sec	e was no issue 9, PT Mitra Aus retariat and	on legal non-compl	y ISPO certified by MUTU Certification International on 30/11/2017 and iance for all uncertified unit. However, it has ben noted that as at June sold to PT Inti Nusa Sejahtera. Refer letter dated 27/6/2019 to RSPO at Bursa Malaysia http://www.bursamalaysia.com/market/listed-02965							
	A positive assurance statement is made, based upon self-	Yes	#	Name of SOU PT Sime	Name of Units East	Positive assurance statement and self-assessment Internal assessment was conducted on 29 May – 3 June 2017 by							
	assessment (i.e.								ļ	'	Indo Agro	Sei Mawang	PT Mutuagung Lestari Auditor
	internal audit) by					2		Subur Abadi	Internal assessment has been conducted for Subur Abadi Plasma				
	organization. This would require evidence of the self-assessment against each requirement;					3	Rumpun Subur abadi	Plasma 1	1 on 22/2/2017. The Subur Abadi Plasma 1 Scheme is currently undergoing RSPO Certification under PT Ladangrumpun Suburabadi pending certification. RSPO Pre-assessment has been completed on 20-24/3/2017. The contract between the Certification Body (PT Mutuagung Lestari) and PT Ladangrumpun Suburabadi is available (dated 6/3/2017) 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. New smallholder project currently under preparation to undergo				
			3	Sejahtera Sakti	NNPA DOO	RSPO Certification by 2019, internal audit for PT BSS has been undertaken, the latest internal audit has been conducted on 21/4/2018.							

		4	PT Bahari Gembira Ria	Plasma BGR	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. Confirmation of the status is in progress. Sime Darby Plantation		
					does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servlet.FileDow_nload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P9000010ioYJEAZ https://rspo.secure.force.com/membership/servlet/servlet.FileDow_nload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P90000010ioXOEAZ		
		6	Pecconina Indonesia PT Sandika	Sungai Jernih Estate and GPI KKPA Karya Palma	Sungai Jernih Estate and GPI KKPA were audited by Mutuagung as verified through Recertification Audit report. The assessment was conducted on 15 – 20/5/2017. Internal assessment was conducted on 10/2/2017.		
		7	Nata Palma PT Budidaya Agro Lestari	KKPA SNP Pelanjau (PT BAL) Sungai Putih (PT BAL) Beturus (PT BAL) KKPA BAL	Internal assessment was conducted on 18 – 23/9/2016. This PT also has conducted Stage 1 audit on RSPO Certification System, P&C RSPO (2016) and RSPO Supply Chain Certification Standard on 17 – 22/4/2017. Smallholder project – targeted for certification by 2020.		
Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.	Yes		uagung Lestari uagung Assessn	had conducted the	consultation with relevant NGO's as verified by audit team through the		
Desktop study e.g. web check on relevant complaints	Yes	It was evident that in handling uncertified management unit, SDP engaged with TuK-Indonesia and continued to work on direct engagement with PAC in order to achieve the consensus with the PAC to address all unresolved issues.					
If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any noncompliance with the requirements.	Yes	http: Mitra and	s://askrspo.force a Austral Sejahte	era has been sold to at Bursa Malaysia <u>ht</u>	Ise/50090000028ErzsAAC/detail However, Sighted as at June 2019 PT PT Inti Nusa Sejahtera Refer letter dated 27/6/2019 to RSPO Secretariat tp://www.bursamalaysia.com/market/listed-companies/company-		

4.6.4 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.	No additional indicators	Yes	As it has been mentioned in 4.4.1 of this checklist, The Land Title for All Estate has been verified, for all estates. The Land Title was under the name of Sime Darby Plantation Bhd. Each estate had legal use of the land through Lands and Surveys Department 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 the SOU.
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Note:

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

Attachment 4

Details of Non-conformities and Corrective Actions Taken

P & C Indicator	Specification Major/Minor	Detail Non-conformances	
2.1.2	Minor	Finding:	
		Mechanism to ensuring legal compliance was not in place	
MZK 01 2019		Objective evidence:	
		Tennamaram Estate - Deductions of salary for 2 employee out of 167 workers were found exceeding 50% of their monthly Salary, specifically for	
		month of Oct 2019.	
3.3.2	Minor	Finding:	
		The Sime Darby procedure as mentioned above stated that the replacement of PPE shall be carried out once broken. However, the	
RAR 01 2019		implementation of SOP was not effectively implemented.	
		Objective evidence:	
		Tennamaram Estate - During interview with group of harvester / pruner and general workers (local and foreigner), they have informed that their	
		safety boot (wellington boot) will be replaced once a year. Verified the last issuance of safety boot for the group of pruner and general workers	
		was in Oct 2018.	

Attachment 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
2.1.1 RZ05 2018	Major (Recurrence)	Findings: 1. Tennamaram Estate does not comply with relevant legal requirements under the Immigration Act 1959/63 and the Immigration Regulations 1963. 2. Bukit Talang Estate does not comply with the relevant legal requirements under Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000. Objective evidence: 1) a. 12 migrant workers who do not have valid permit were hired by harvesting contractor, Puspavalle Enterprise, to work at Hopeful Division, Tennamaram Estate. This contravenes Section 55B Immigration Act 1959/63. b. 12 migrant workers who do not have valid permit were found living at the Hopeful Division workers' quarters. This contravenes Section 56 (1) (d) Immigration Act 1959/63. c. 1 migrant worker hired by harvesting contractor, Puspavalle Enterprise, to work as harvester at Hopeful Division, Tennamaram Estate has a Visit Pass for the Construction Sector. Working in an oil palm plantation is contrary to the conditions of issuance of his Visit Pass (Temporary Employment). This contravenes Rule 39(b) Immigration Regulations 1963. 2. 1 worker was found on 15 November 2018 carrying out P&D spraying at the oil palm nursery, Bukit Talang Estate after a medical practitioner had certified that he was unfit for spraying via report dated 8 November 2018. This contravenes Section 28(1) Occupational Safety and Health (Use and	Correction: - Termination letter issues to Puspavalle Enterprise by Tennamaram Estate for Breaching its contract with the company. Termination of Puspavalle Enterprise fork work engaged for the entire Selangor Region is also executed Management and Person in Charge of Medical Surveillance must vet through all the reports submitted by Occupational Health Doctor (OHD). Corrective Action: - A Standard Operating Procedure (SOP) will be developed by HQ to ensure monitoring mechanism of contractor's workers is in place A letter dated 26/11/2018 has been issued to Klinik Ng and Singh expressing SDP Disappointment and informing the discontinuation of service with the said clinic.	- Auditor has verified the termination letter of contractor dated 16/11/18. New SOP developed named 'Contractor Workers Management' dated 24/11/18 and also checklist of monitoring the contractor at estate. - Auditor has received and verified the reminder letter issued to PIC of Bukit Talang Estate dated 16/11/18. The letter of apology, dated 17/11/18 from Klinik NG was also sighted where they have acknowledged the wrong reporting and the second opinion issued by Klinik Tasik Putri on 17/11/18 stated that all sprayers were indeed healthy. Status: Closed

		Chandende of European of Objectively Users de T		<u> </u>
		Standards of Exposure of Chemicals Hazardous To		
14 1 1 5	N4 :	Health) Regulations.	2 ::	A 1': 1 ' 1 d 1' c' C
Module D	Major	Finding:	Correction	- Auditor has received the application of
Identity		There is projected overproduction of certified	To revise/ complete SOP of CPO/PK	PK volume extension has been approved
Preserved		tonnage.	Product Traceability, by adding the	by RSPO on dated 29/11/18 and verified
Indicator: D.4.2		Objective evidence :	requirement about the obligation to report	SOP name SOP for Sustainable Supply
MZK 01 2018		Sighted that overproduction Projected PK IP for	overproduction of certified tonnage.	Chain and Traceability dated Sept 2018
		period Dec 2017 - Nov 2018 which is projected	Management of Tennamaram already	amended on clause 15 Production Volume
		12,635.20 mt and actual 12,772.06 mt and	apply extension of volume to the CB on	no 15.3
		Tennamaram POM yet to inform the CB and apply	date 13/11/18	
		extension to the RSPO.	Corrective Action	Status: Closed
			To Management Representative will	
			monitor the implementation of SOP	
			through Internal Audit.	
			Management already amended the SOP	
			regarding Over production.	
2.1.3	Minor	Finding:	Correction	A Standard Operating Procedure (SOP) for
RAR 01 2018		To ensuring compliance on industry code of practices	To ensure that contractor's worker is sent	monitoring mechanism of contractor's
		for safe working in confined space 2010 was not	for health certificate fitness for working in	workers is in place.
		implemented.	confined space.	
		Objective evidence:	Corrective Action	Status: Closed.
		At Tennamaram POM, contractor workers who	A Standard Operating Procedure (SOP)	
		conduct maintenance service at confined space area	will be developed by HQ to ensure	
		on 08-09/10/2018 and 27-28/06/2018 don't have	monitoring mechanism of contractor's	
		health certificate fitness as per stated in industry	workers is in place currently the SOP has	
		code of practices for safe working in confined space	been discussed in the HQ and will be	
		2010.	Distributed to SOU when Complete.	
4.1.2	Minor	Findings:	Correction	A Standard Operating Procedure (SOP)
RZ04 2018		1. There is no consistent implementation of Sime	1. Termination letter will be issued to	to ensure monitoring mechanism of
		Darby Berhad's Human Rights Charter and Vendor	Puspavalle Enterprise for breaching its	contractor's workers is in place.
		Code of Business Conduct (COBC).	contract with the company	2. Verified monitoring logbook/ sheet which
		2. There is no mechanism to check the consistent	2. To conduct training on water table	was conducted on a monthly basis.
		implementation of contractual obligations with a	monitoring to personnel involved	
		Vendor.	Corrective Action	Status: Closed
		3. Water table monitoring of Section 10 of the	1. A Standard Operating Procedure (SOP)	
		Agriculture Reference Manual on water table in	will be developed by HQ to ensure	
		coastal estates or peat areas was not complied with.	monitoring mechanism of contractor's	
		Objective evidence:	workers is in place (To address Objective	
		1. The hiring of 12 workers who do not possess Valid	Evidence 1 & 2)	
		Pass under Section 55B Immigration Act 1959/63 at	2. To ensure that monitoring logbook/	
		Hopeful Division, Tennamaram Estate by harvesting	sheet is verified by Assistant Manager on	

		contractor, Puspavalle Enterprise contravenes the pledge to eradicate all forms of exploitation elucidated in Sime Darby Berhad's Human Rights Charter and Vendor COBC. 2. The hiring of 12 workers who do not possess Valid Pass under Section 55B Immigration Act 1959/63 at Hopeful Division, Tennamaram Estate by harvesting contractor, Puspavalle Enterprise breaches paragraph (e) of the Terms and Conditions on Purchase Order signed between Tennamaram Estate and Puspavalle Enterprise (Contract Form No 4300438025) dated 1 October 2018. 3. On Sg Buloh Estate, being a coastal estate, there is no evidence that water table monitoring is being carried out.	a monthly basis	
4.1.3 RZ03 2018	Minor	Finding: No records of action taken on the recurring issues identified in weekly housing inspection reports since 12 November 2016. Objective evidence: Chemical containers at Sg Buloh Estate (Kuala Selangor Division linesite) has been a recurring issue identified in the weekly housing inspection reports since 12 November 2016 until 10 November 2018. There is no evidence that any remedial action has been taken.	Manager to send out a memo to remind person in charge to include housing area findings in their periodical meetings and to perform remedial action, if necessary	No recurring issues identified in weekly housing inspection reports on chemical containers at Sg. Buloh Estate (Kuala Selangor Division linesite) as verified by audit team. Status: Closed.
6.1.4 RZ02 2018	Minor	Finding: 1. Impacts of replanting at Sg Buloh Estate and Bukit Talang Estate were not taken into account when reviewing the Social Impact Assessment Plans. 2. Social Management Plan dated 1 Nov 2018 at Sg Buloh Estate has not taken into account social issues raised by stakeholders. Objective evidence: 1. The Social Impact Assessment Action Plans carried out by Sg Buloh Estate and Bukit Talang Estate did not take into account the impacts of ongoing replanting activities on affected parties. 2. The Social Management Plan of Sg Buloh Estate dated 1 Nov 2018 did not take into consideration social issues raised in Gender Committee meetings dated 8 Oct 2018 and 16 March 2018 relating to PPE and work tools for workers, requests for vehicle for	HQ to perform Social Impact Assessment (SIA) to stakeholders affected by replanting activity at Sg Buloh Estate & Bukit Talang Estate HQ to conduct refresher training to guide SOU 6 Tennamaram to update their Social Action Plan effectively	The Social Impact Assessment Action Plans at Sg Buloh Estate and Bukit Talang Estate had taken into account the impacts of ongoing replanting activities on affected parties. The Social Management Plan at Sg Buloh Estate had considered social issues raised in Gender Committee meetings related to PPE and work tools for workers, requests for vehicle for medical appointments at Klinik Kesihatan Kuala Selangor, and for installation of lights in dark areas. Status: Closed

		medical appointments at Klinik Kesihatan Kuala		
		Selangor, and for installation of lights in dark areas.		
6.8.3	Minor	Finding: The recruitment selection of 12 migrant	Corrective Action Plan	Verified that no harvesting conducted by
RZ01 2018		workers by harvesting contractor, Puspavalle	A Standard Operating Procedure (SOP)	contractor's workers at Tennmaram Estate.
		Enterprise, to work at Hopeful Division, Tennamaram	will be developed by HQ to ensure	Current harvesting workers were recruited
		Estate was not based on skills, capabilities, qualities	monitoring mechanism of contractor's	based on skills, capabilities, qualities and
		and medical fitness.	workers is in place currently the SOP has	medical fitness.
		Objective evidence:	been discussed in the HQ and will be	
		1. 5 migrant workers hired via Puspavalle Enterprise	Distributed to SOU when Complete.	Status: Closed
		to work at Hopeful Division, Tennamaram Estate as	Management Tennamaram Estate will	
		pruners were previously working as follows:	ensure that contractor has to carry out	
		a. 2 were restaurant workers;	training and medical examination for all	
		b. 1 was a bricklayer;	their workers to ensure that they are fit to	
		c. 1 was a paint factory worker; and	work. A set of medical report copy shall be	
		d. 1 was a construction worker.	handed over to the estate management as	
		2. There are no medical records for 12 migrant	the evidence of the worker's fitness. This	
		workers (5 pruners and 7 harvesters) hired via	is an action that will be taken by the	
		Puspavalle Enterprise to work at Hopeful Division,	contractor's immediately.	
		Tennamaram Estate.		

ATTACHMENT 6 – Timebound Plan

Table 1: Initial Timebound Plan and Summary of RSPO Certification Status

5 SOUs		
	Sime Darby Plantation has had all its SOUs (Malaysian & Indonesian) completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2011, all Malaysian SOUs have been	For details please refer to Attachments: i) SDP - RSPO Certification Status for Malaysia Operations ii) SDP- RSPO Certification Status for Indonesia Operations iia) Updates on PT MAS iii) RSPO SCCS status for Sime Darby Plantation (Downstream Operations)
20 SOUs (from Malaysia and Indonesia)		
20 SOUs (from Malaysia and Indonesia)		
17 SOUs (from Malaysia and Indonesia)		
	(from Malaysia and Indonesia) 20 SOUs (from Malaysia and Indonesia) 17 SOUs	completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2011, all Malaysian SOUs have been RSPO certified (with the exception of 2 new oil mills commissioned to replace the current oil mills after the initial timebound plan targets). 97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes. Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. A new mill in Liberia is planned to be commissioned. Note: Time-bound plan to achieve 100% RSPO certification has shifted to 2015. 20 SOUs (from Malaysia and Indonesia) 17 SOUs

Note: SOU - Strategic Operating Units (consisting of one oil mill and supplying estates)

Table 2: Details of RSPO Certification Status as at June 2019

Status	Malaysia	Indonesia	Liberia	Total	Remarks
RSPO Certified	33	23	0	56	Malaysia * Effectively 33 Mills (Excluding Bintang Oil Mill) - Note: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down, and Pekaka POM is being mothballed. *SDP acquired Bintang Palm Oil Mill, Talisman Estate, and Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bk Paloh Estate of SOU 21 Gunung Mas, while Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut. Lian Seng will be incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018, whilst Talisman Estate has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2017. For Bintang Oil Mill, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold as at Dec 2017. Indonesia *Effectively 23 Mills *Note: Angsana Mini POM closed down in 2016. Selabak POM is being mothballed.
Planned for Certification/Under going Stage 1 or Stage 2 Assessment/ RSPO EB Review	0	1	1	2	SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Indonesia PT MAS has undergone RSPO Main assessment and is delayed due to some social disputes. The target date for certification is by 2017 subject to the progress of the matter being resolved. Smallholders As at Dec 2017, a total of 28,712 Ha of smallholders have been certified. The entire KKPA (1-5) in Sebamban, KKPA Sg. Cengal, and Plasma TGK and SIA (East and West Plasma) are now RSPO certified with a production capacity of 465,602 mt of FFB. Total scheme smallholders hectares are 51,353 and total communities are 22,613. Certification process for the remaining associated smallholders areas is on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and outgrowers by end 2020. Liberia Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification Stage 2 Assessment in March/April 2018. RSPO NPP process has been completed in 2011.
Total SOUs	33	24	1	58	Other remarks: In March 2015, Sime Darby Plantation completed the acquisition of New Britain Palm Oil Limited (NBPOL). NBPOL is managed under a separate entity and the reporting of timebound plan will be under NBPOL's management. NBPOL is considered as a different entity/member under the RSPO and NBPOL is 100% RSPO Certified.

SDP - RSPO Certification Status for Malaysia Operations

NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '11	11-Aug-20	SPO 550179	
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	
5a	Sg Samak		3 Mar '11	NA	NA	
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	
8	East	Carey Island, Selangor	19 May '10	18-May-20	SPO 543543	
9	West	Carey Island, Selangor	19 May '10	18-May-20	SPO 543594	
9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	
10	Bukit Puteri	Raub, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020	
11	Kerdau	Temerloh, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019	
12	Jabor	Kuantan, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049	
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-21	CU-RSPO-819163, SGSRSPO/PM/MY13/01284, 824 502 16039, SGS-RSPO/PC17-00004, CURSPO-855480	
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-20	SPO 541905	
15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-24	SGS-RSPOPM-MY14/01364, 824 502 16032	Sua Betong Oil Mill has been comissioned to replace Rantau Oil Mill with Certificate No: CU- RSPO-819165, certification date: 30 Dec 2011.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '11	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051	
17	Kempas	Jasin, Melaka	20 May '15	19-May-20	RSPO-PC 00101	
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-24	RSPO 600305	Pagoh Oil Mill has been commisioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.

19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	NA	
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-20	RSPO 548299	
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042	
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	SGS-RSPO/PM-00715, 824 502 16040, BVC-RSPO20170623-01	
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	NA	
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-23	RSPO 537872	
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-20	RSPO 001	
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-20	RSPO 002	_
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-20	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	
32	Rajawali	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819167, RSPO 0020	
33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	
34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-815150, MUTU-RSPO/054	Mill is mothballed, supply base merged into Lavang effective Dec 2017.

Legends: Certification Withdrawal

SDP- RSPO Certification Status for Indonesia Operations

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	MUTU-RSPO/011, SGS- RSPO/PC17-00005, SGS- RSPO/PC17-00005	
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	2-Jul-23	MUTU-RSPO/027	
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	3-Aug-22	MUTU-RSPO/014	Recertification of Bebunga POM is in progress.
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	
7	PT BAHARI GEMBIRA RIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	28-Nov-22	MUTU-RSPO/019	
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	24-Nov-20	MUTU-RSPO/002	
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	19-Jul-22	MUTU-RSPO/016	Recertification of Pondok Labu POM is in progress.
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	

11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	19-Nov-22	MUTU-RSPO/017	Recertification of Rantau Panjang POM is in progress.
12 13	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11 1-April-14	05-Feb-22 31-Mar-24	MUTU-RSPO/009 MUTU-RSPO/035	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	MUTU-RSPO/001	
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	16-Mar-17	MUTU-RSPO/015	Mill is mothballed.
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	28-Nov-22	MUTU-RSPO/020	
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU-RSPO/004	
18 19	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU MANDAH	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16 1-April-14	30-Nov-21 31-Mar-24	MUTU-RSPO/008 MUTU-RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU-RSPO/007	
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	28-Dec-22	MUTU-RSPO/018	

22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	2-May-23	MUTU-RSPO/026	
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-24	MUTU-RSPO/044	
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	NA	NA	

Legends

Pending Certification by RSPO Mill closed down/Mothballed NA - NOT APPLICABLE

No	Management Unit	Cimple Page	Time	Lagation	Ctatus	Contificat Data
No	SOU Name	Supply Base	Bound Plan	Location	Status	Certified Date
		Tetere Oil Mill				
		Tetere Estate				
		Ngalimbiu Estate				
	Guadalcanal Plains Palm Oil	Mbalisuna Estate		Guadalcanal Province,		
1	Limited (GPPOL)	Outgrowers – West Zone	NA	Solomon Islands	Certified	18-Mar-11
		Outgrowers – Central Zone				
		Outgrowers – MBA East Zone				
		Outgrowers – MBE East Zone				
		Hagita Oil Mill		Milne Bay Province,		
		Giligili Estate				
		Waigani Estate				
		Sagarai Estate				
		Padipadi Estate				
2	Milne Bay Estates (MBE)	Mariawatte Estate	NA	Papua New Guinea	Certified	15-Feb-18
		East Gurney Estate				
		West Gurney Estate				
		East Sagarai Estate	1			
		West Sagarai Estate				
		Poliamba Oil Mill		New Ireland Province,		
3	Poliamba (POL)	Kara Estate	NA	Papua New Guinea	Certified	19-Mar-12

		Nalik Estate				
		West Coast Estate				
		Noatsi Estate				
		Madak Estate				
		North Smallholders (613)				
		South Smallholders (863)				
		West Smallholders (309)				
		Gusap Mill				
		Gusap East (Gusap) Estate				
		Gusap West (Paddox) Estate				
4	Ramu Agricultrual Industries Ltd (RAIL)	Surinam Estate	NA	Morobe Province, Papua New Guinea	Certified	5-Aug-10
		Dumpu Estate				
		Ngaru Estate				
		J Estate (Jephcott) Estate				
		Sangara Oil Mill				
		Mamba Oil Mill				
		Embi Estate				
		Ambogo Estate				1-Feb-13
5	Higaturu Oil Palm (HOP)	Sangara Estate	NA	Oro Bay Province, Papua New Guinea	Certified	
		Sumbiripa Estate				
		Mamba Estate				
		Mosa Oil Mill				
		Kumbango Oil Mill				

		Kapiura Mill Numundo Mill Waraston Mill Bebere Estate Kumbango Estate Togulo Estate Dami Estate				
6	West New Britain (WNB)	Waisisi Estate Kautu Estate Karausu Estate Moroa Estate Bilomi Estate Loata Estate Haella Estate Garu Estate Daliavu Estate Sapuri Estate Malilimi Estate Rigula Estate Nomundo Estate Navarai / Karato ME /KDC EU Estate Volupai / Lotomgam / Natupi / Goruru Estate	NA	Kimbe, West New Britain, Papua New Guinea	Certified	10-Sep-08

		Lolokoru Estate				
		Ove Estate				
		Tamare Estate				
Markham Farming	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 fullfilled in order to achieve certification. The Disclosure has been has been initiated on 18.10.18. Currently HCV/HCS, SEJIA and LUCA are being undertaken in order to submitte and mitigation and	
7	Company Limited (MFCL) / Markham Agro Pte. Ltd.	Erap Estate	Sep-20		D-CD	order to submitt 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.

SDP - RSPO Certification for Time Bound Plan - Liberia Operations

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
1	Sime Darby Plantation (Liberia) Grand Cape Mount	Grand Cape Mount Mill	2019	Grand Cape Mount County	Not yet Certified	NA	In May – September 2011, SDPL has undergone a series of assessment including Social and Environmental Impact Assessment and High Conservation Value Assessment in conformance with the RSPO New Planting Procedures to begin planting.
		Bomi Estate					*Note: RSPO NPP Announcments can be found at http://www.rspo.org/certification/new-planting-procedures/publicconsultations/page/14?
		Lofa Estate					SDPL has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was only completed conducted and put onhold due to security & safety issue. After due consideration on the current engagement with the House of Representative in Liberia, SDP management decided to postpone the time bound plan of RSPO Certification to 2019 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process. A letter of Request for Extension of RSPO Certification Time Bound Plan for Sime Darby Plantation dated 22 May was sent to RSPO Secretariat, Head of Certification, and with response to Sime Darby Plantation on 23 May 2019 with no objections on the extension.
		Matambo Estate					
		Grand Cape Mount Estate					