

**CONFIDENTIAL**

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

File Ref: ES10170016

**RSPO AUDIT REPORT**

**CLIENT : SIME DARBY PLANTATION BERHAD – SOU 29 GIRAM**

**PARENT COMPANY : SIME DARBY PLANTATION BERHAD**

**RSPO MEMBERSHIP NO.: 1-0008-04-000-00**

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

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

**MAP :** See Attachment 1

**AUDIT DATE :** 1-4 September 2020

**DURATION :** 10 auditor days

**TYPE OF AUDIT :** ☐ Annual Surveillance Audit 4

☒ Recertification Audit

**STANDARD :** MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

**SCOPE OF CERTIFICATION:** Production of Sustainable Crude Palm Oil and Palm Kernel Using the Mass Balance Supply Chain Model

**VALIDITY OF RSPO CERTIFICATE :** 13 July 2015 - 12 July 2020  
 (extended to 12 Jan 2021; provided under the provision in addressing the Covid-19 pandemic condition)

**The following attachments form part of this report:**

Non-conformity Report(s) ☐

List of additional site(s) ☐

**Report by Audit Team Leader**

Name : Mohd Ab Raouf bin Asis

Signature :

Date : 1 December 2020

**Acknowledgement by Client's Representative**

Name :

Signature :

Date : 21/12/2020

## RSPO P&C AUDIT REPORT

### SUMMARY OF AUDIT

Recertification Audit				
On-site audit date :	1 – 4 September 2020 (10 a.d)	No. of auditor days :	14 Auditor Days	
Remote audit date :	27 – 28 April 2020 (4.0 a.d)			
Audit team :	Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar bin Kamaruzaman (LA remote), Rozaimee bin Ab Rahman			
No. of major NCR :	4	Indicator: 2.1.1, 3.4.3, 3.7.1, 6.1.5	Closing date : 24/11/2020	
No. of minor NCR :	3	Indicator : 2.1.3, 3.3.2, 4.3.1		
Indicate the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers / Local communities	Suppliers
	✓	N/A	✓	✓
	Contract workers	NGOs	Govt. agency	Independent growers
	N/A			
	Indigenous people	Contractor	Others (Please specify)	
	N/A	N/A		
Supply base sampled :	Mostyn Estate and Giram Estate			
Justification of audit planning	Total allocation of auditor days for Giram CU were: Mill = 3 days (1 day for social, 0.5 day for supply chain certification systems and 1.5 days for safety and health, environment, mill best practices, GHG verification, TBP, Partial Certification). Mosty Estate and Giram Estate = 3.5 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification plus the verification of Land History and Land Title. Remote audit = 4 days.			
Changes since the last audit :	No changes			
Report approved by	Kamini Sooriamoorthy		Date:	

Annual Surveillance Audit 1				
On-site audit date :		No. of auditor days :		
Audit team :				
No. of major NCR :		Indicator:	Closing date : -	
No. of minor NCR :		Indicator :		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers / Local communities	Suppliers
	Contract workers	NGOs	Govt. agency	Independent growers
	Indigenous people	Contractor	Others (Please specify)	
Supply base sampled :				
Changes since the last audit :				

## RSPO P&C AUDIT REPORT

Annual Surveillance Audit 2				
On-site audit date	:		No. of auditor days :	Auditor Days
Audit team	:			
No. of major NCR	:	Indicator:	Closing date:	
No. of minor NCR	:	Indicator :		
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees	Settlers	Villagers / Local communities
				Suppliers
		Contract workers	NGOs	Govt. agency
				Independent growers
		Indigenous people	Contractor	Others (Please specify)
Supply base sampled	:			
Changes since the last audit	:			

Annual Surveillance Audit 3				
On-site audit date	:		No. of auditor days :	Auditor Days
Audit team	:			
No. of major NCR	:	Indicator:	Closing date:	
No. of minor NCR	:	Indicator:		
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees	Settlers	Villagers / Local communities
				Suppliers
		Contract workers	NGOs	Govt. agency
				Independent growers
		Indigenous people	Contractor	Others (Please specify)
Supply base sampled	:			
Justification of audit planning	:			
Changes since the last audit	:			
Report approved by	:		Approval date :	

Annual Surveillance Audit 4				
On-site audit date	:		No. of auditor days :	
Audit team	:			
No. of major NCR	:	Indicator:	Closing date :	
No. of minor NCR	:	Indicator :		
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees	Settlers	Villagers / Local communities
				Suppliers
		Contract workers	NGOs	Govt. agency
				Independent growers
		Indigenous people	Contractors	Others (Please specify)
Supply base sampled	:			
Justification of audit planning	:			
Changes since the last audit	:			
Report approved by	:		Approval date :	

# RSPO P&C AUDIT REPORT

## SUMMARY OF INFORMATION

**TABLE 1**

	RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Sep20-Aug21				**May19-April20
Certified FFB Processed (MT)	130,685.67				154,000.00
Production of Certified CPO (MT)	31,233.88				35,420.00
Production of Certified PK (MT)	7,841.14				8,470.00
Certified Areas (Ha)	8,345.02				8,345.02
Planted Areas (Ha)	7,471.32*				7,519.92
Production Areas (Ha)	5,744.94				7,098.95
HCV Areas, including the Conservation Area (Ha)	89.39				89.39
REMARKS	<p>*Changes in planted hectareage Giram Estate and Mostyn Estate for FY 2020 is due to resurvey of fields in June 2020 conducted after replanting.</p> <p>**This was the projected period based on audit carried out last year. However, during the conduct of RA in Sept 2020, the actual reporting period has been extended to 15 months as the recertification audit was delayed due to Covid-19 pandemic restrictions. The actual reporting period i.e. May 2019-Aug 2020 was reflecting the actual stocks and transactions carried out by the CU.</p>				

**TABLE 2**

	PO	PK
Last years certified volume (MT)	*52,779.00	*12,460.00
Last years actual certified sold (MT)	0	7,975.63
Last years actual sold under other schemes (MT)	0	0
Last years sold conventional (MT)	37,280.02	385.22
New year certified volume (MT)	31,233.88	7,841.14

\*Extension of volume for both CPO (17,359MT) and PK (3,990MT) has been requested and approved by RSPO on 11/08/2020.

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**1.0**

**AUDIT PROCESS**

**1.1 Certification Body**

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

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

**1.2 Qualification of audit team**

<b>Member of the Audit Team</b>	<b>Role/area of RSPO requirements</b>	<b>Qualifications</b>
Mohd. Ab Raouf bin Asis	Lead Auditor / Social (Mill & Plantation Employees), GAP	Holds a B.Sc. in Manufacturing (Production and Operation). He had more than 7 years of working experience in the oil palm operation. Currently he qualified as Lead Auditor for RSPO P&C and MSPO Certification.
Mohd Zulfakar bin Kamaruzaman	Lead Auditor / Supply Chain, Social (Land Title & External Stakeholders), HCV	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C, RSPO Supply Chain and MSPO Certification.
Rozaimie bin Ab Rahman	Auditor / Safety and Environment, GHG, TBP	Holds a B. Sc. of Agriculture. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO Certification.

### 1.3 Audit methodology

The audit covered Giram palm oil mill and 2 of its supply bases, namely Giram Estate and Mostyn Estate. The audit included an on-site audit to the estates, mill and settlers' 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

SIRIM QAS International had initiated the stakeholder consultation by announcing the invitation in the RSPO and SIRIM QAS International's websites in 28/07/2020. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs) and the stakeholder consultation was again, carried out during the on-site audit. Over the public consultation period, only one (1) feedback received i.e Humana Child Aid Society Sabah regarding the pending new agreement which still pending. This concern was verified during the onsite. Other than that, there was no other 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)	<p>Workers:</p> <ul style="list-style-type: none"><li>a. Workers work 6 days a week with one rest day (Sunday). They work 8 hours with a minimum of 30 minutes' break in between.</li><li>b. All workers sampled confirmed that they receive a minimum of RM1100 per month. They receive their salaries before 7<sup>th</sup> of every month. As of the date of this audit, all of sampled workers understood on Minimum Wages.</li><li>c. Any overtime work is mutually agreed between workers and management, and that there is no element of forcing.</li><li>d. Foreign workers are not subjected to any recruitment fee. Foreign workers who choose to keep their passports at the office have done so with their written consent.</li><li>e. Workers are generally satisfied with the way complaints lodged are acted upon. Delays in house repairs, if any, are usually due to the need to order repair parts.</li><li>f. Workers, including foreign workers get to appoint their own representatives. There is no interference of influence exerted by the employer.</li><li>g. For newly-arrived foreign workers who do understand Bahasa or English, translations are provided during briefings.</li><li>h. Workers interviewed during audit as follows:</li></ul> <table><tr><th>No</th><th>Name</th><th>Mill/Estate/Nationality</th><th>Designation</th></tr><tr><td>1</td><td>Nyompa</td><td>Giram Mill /Indonesia</td><td>FFB Grader</td></tr><tr><td>2</td><td>Aynal</td><td>Giram Mill /Indonesia</td><td>FFB Grader</td></tr><tr><td>3</td><td>Affi</td><td>Giram Mill /Indonesia</td><td>FFB Grader</td></tr><tr><td>4</td><td>Jamaludin</td><td>Giram Mill / Local</td><td>Boilerman</td></tr><tr><td>5</td><td>Hisham</td><td>Giram Mill / Local</td><td>Boilerman</td></tr><tr><td>6</td><td>Saripudin</td><td>Giram Mill / Local</td><td>Boilerman</td></tr><tr><td>7</td><td>Abdul Rashid</td><td>Giram Mill / Local</td><td>Water trtmt operator</td></tr><tr><td>8</td><td>Azman</td><td>Giram Mill / Local</td><td>Foreman</td></tr><tr><td>9</td><td>Jupri</td><td>Giram Mill / Local</td><td>Wshop att</td></tr><tr><td>10</td><td>Norazman</td><td>Giram Mill / Local</td><td>Wshop att</td></tr><tr><td>11</td><td>Halim</td><td>Giram Mill / Local</td><td>Lab Attendant</td></tr></table>	No	Name	Mill/Estate/Nationality	Designation	1	Nyompa	Giram Mill /Indonesia	FFB Grader	2	Aynal	Giram Mill /Indonesia	FFB Grader	3	Affi	Giram Mill /Indonesia	FFB Grader	4	Jamaludin	Giram Mill / Local	Boilerman	5	Hisham	Giram Mill / Local	Boilerman	6	Saripudin	Giram Mill / Local	Boilerman	7	Abdul Rashid	Giram Mill / Local	Water trtmt operator	8	Azman	Giram Mill / Local	Foreman	9	Jupri	Giram Mill / Local	Wshop att	10	Norazman	Giram Mill / Local	Wshop att	11	Halim	Giram Mill / Local	Lab Attendant
No	Name	Mill/Estate/Nationality	Designation																																														
1	Nyompa	Giram Mill /Indonesia	FFB Grader																																														
2	Aynal	Giram Mill /Indonesia	FFB Grader																																														
3	Affi	Giram Mill /Indonesia	FFB Grader																																														
4	Jamaludin	Giram Mill / Local	Boilerman																																														
5	Hisham	Giram Mill / Local	Boilerman																																														
6	Saripudin	Giram Mill / Local	Boilerman																																														
7	Abdul Rashid	Giram Mill / Local	Water trtmt operator																																														
8	Azman	Giram Mill / Local	Foreman																																														
9	Jupri	Giram Mill / Local	Wshop att																																														
10	Norazman	Giram Mill / Local	Wshop att																																														
11	Halim	Giram Mill / Local	Lab Attendant																																														

# RSPO P&C AUDIT REPORT

		12	Nurasmda	Mostyn Estate / Indonesia	Sprayer
		13	Ramlayani	Mostyn Estate / Indonesia	Sprayer
		14	Norlina Masabang	Mostyn Estate / Indonesia	Sprayer
		15	Kasma Saude	Mostyn Estate / Indonesia	Sprayer
		16	Simor Mansor	Mostyn Estate / Indonesia	Sprayer
		17	Sahriya Pasarai	Mostyn Estate / Indonesia	Sprayer
		18	Muhammad bin Raman	Mostyn Estate / Indonesia	Sprayer
		19	Maryadi	Mostyn Estate / Indonesia	LF Picker
		20	Abdul Wahid	Mostyn Estate / Indonesia	LF Picker
		21	Muhammad Ali Kuda	Mostyn Estate / Indonesia	LF Picker
		22	Fazlan nasir	Mostyn Estate / Local	LF Picker
		23	Suwardi	Mostyn Estate / Indonesia	LF Picker
		24	Darmina Marzuki	Giram Estate / Local	Weeding
		25	Lisna Mustapa	Giram Estate / Local	Weeding
		26	Rihana Kasa	Giram Estate / Local	Weeding
		27	Riah Nano	Giram Estate / Local	Weeding
		28	Hasnatang	Giram Estate/Indonesia	LF Picker
		29	Jiba	Giram Estate/Indonesia	LF Picker
		30	Soeardi	Giram Estate/Indonesia	LF Picker
		31	Tamang	Giram Estate/Indonesia	LF Picker
		32	Rustam Berhan	Giram Estate/Indonesia	LF Picker
		33	Berhan	Giram Estate/Indonesia	LF Picker
		34	Muhammad Nor bin Kasman	Giram Estate/Indonesia	LF Picker
		35	Jusmiati bt Menambung	Giram Estate/Indonesia	LF Picker
		36	Hajah Aimah	Giram Estate/Indonesia	LF Picker
		37	Asti	Giram Estate/Local	Hospital Assistant
		38	Erwin Shamsudin	Giram Estate/Indonesia	Harvester
		39	Opit	Giram Estate/Indonesia	Harvester
		40	Ahmadi Ahmad	Giram Estate/Indonesia	Harvester
		41	Mahsan	Giram Estate/Indonesia	Harvester
		42	Hassan	Giram Estate/Indonesia	Harvester
	2) Settlers	Not applicable			
	3) Villagers / Local communities (including women representatives, displaced communities)	Generally the villagers have several issues. This has been based on interviews made with the representatives from Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Mostyn Lama and Kg Selamat. The issues has been highlighted in the indicator 3.4.3, thus NCR also has been issued.			
	4) Suppliers	No issue raised. Payments are received in time.			
	5) Contract workers	At time of visit there were no contract workers.			
	6) Local & national NGOs	Not available for this audit.			
	7) Government agencies / Statutory bodies	No complaints received.			
	8) Independent growers / Smallholders	Not applicable.			
	9) Indigenous people	Not applicable			
	10) Contractor	No issue. Contracts are fair and payments are promptly received within less than one month.			
	11) Previous land owner (if any)	Not applicable.			
	12) Others (please specify)	Not applicable			

## RSPO P&C AUDIT REPORT

### 1.5 Audit plan:

Refer to Attachment 2.

### 1.6 Date of next audit:

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

## 2.0 SCOPE OF CERTIFICATION AUDIT

### 2.1 Description of the certification unit

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

The Giram CU comprises of the Giram Palm Oil Mill (Giram POM) and two supply base i.e. the Giram Estate and Mostyn Estate. All the estates are owned by SDPB. The Giram POM has a mill capacity of 60 mt/hour. All the estates have been fully developed before 2005.

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

The FFB sourced from company owned estates that are certified and a small proportion from third party suppliers. Details of the FFB contribution from each source to the Giram Palm Oil Mill were as follow:

**Table 1: Actual FFB production by the supply base for the last reporting period May 2019 to August 2020**

Estates	FFB Production	
	Tonnes	Percentage (%)
Giram Estate	85,889.99	51.79
Mostyn Estate	79,728.80	48.07
Merotai Estate	15.38	0.01
OCP (non-certified)	325.50	0.13
<b>Total</b>	<b>165,959.67</b>	<b>100</b>

**Table 2: Projected FFB production by the supply base for the next reporting period Sep 2020 to Aug 2021**

CU own estates	FFB Contribution	
	Tonnes	Percentage (%)
Giram Estate	69,238.65	47.20
Mostyn Estate	61,447.02	41.89
OCP (non-certified)	16,000.00	10.91
<b>Total</b>	<b>146,685.67</b>	<b>100</b>

**Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period May 2019 to Aug 2020**

RSPO Supply Chain Model: Mass Balance	Total (MT) (May 2019-March 2020)	Total (MT) (April 2020-Aug 2020)
FFB Received	118,456.50	47,503.17
FFB Processed	118,456.50	47,503.17
Certified FFB Processed	118,456.50	47,177.67
Non – Certified FFB Processed	0.00	325.50
Overall CPO Production	26,837.30	10,517.71
Certified CPO Production	26,837.30	10,442.72
CPO Delivered as RSPO Certified	0.00	0.00
CPO Delivered under other schemes (MT)	0.00	0.00
CPO Delivered as Non-RSPO certified	26,837.30	10,442.72
Overall PK Production	5,909.50	2,477.23
Certified PK Production	5,909.50	2,459.35
PK Delivered as RSPO certified	5,748.96	2,226.67
PK Delivered under other schemes (MT)	0.00	0.00
PK Delivered as Non-RSPO certified	220.50	164.72
Credits traded thru Book & Claim	0.00	0.00

## RSPO P&C AUDIT REPORT

**Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period  
Sep 2020 – Aug 2021**

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	146,685.67
FFB Processed	146,685.67
Certified FFB Processed	130,685.67
Certified CPO Production	31,233.88
Certified PK Production	7,841.14

**Table 5 Planted and certified area of the CU**

Estate	Planted (ha)	Certified (ha)
Giram Estate	3924.07	4166.98
Mostyn Estate	3547.25	4178.04
<b>Total</b>	<b>7471.32</b>	<b>8,345.02</b>

**Table 6: Planting profile for Giram Estate**

Year of planting	Planting cycle (Generation )	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
<b>BARAT DIV.</b>				
99B1	1	Mature	65.90	1.68
99B	1	Mature	79.94	2.04
96B1	1	Mature	69.51	1.77
96B	1	Mature	73.61	1.88
95B3A	1	Mature	88.16	2.25
95B2A	1	Mature	103.61	2.64
95B2	1	Mature	65.71	1.67
95B1A	1	Mature	39.63	1.01
95B1	1	Mature	77.23	1.97
2016B	2	Mature	94.03	2.40
2016A	2	Mature	65.98	1.68
2018A	2	Immature	49.29	1.26
2018B	2	Immature	69.12	1.76
2018C	2	Immature	78.60	2.00
2018E	2	Immature	42.41	1.08
2018F	2	Immature	83.64	2.13
<b>TIMOR DIV.</b>				
99T1	1	Mature	64.78	1.65
99T	1	Mature	100.56	2.56
96TA	1	Mature	92.41	2.35
96T1A	1	Mature	41.02	1.05
96T1	1	Mature	80.55	2.05
96T	1	Mature	66.93	1.71
95T2A	1	Mature	90.67	2.31
95T2	1	Mature	97.30	2.48
95T1B	1	Mature	65.67	1.67
95T1A	1	Mature	90.29	2.30
95T1	1	Mature	55.03	1.40
93T2A	1	Mature	52.89	1.35
93T2	1	Mature	63.97	1.63

## RSPO P&C AUDIT REPORT

2018D	2	Immature	86.93	2.22
<b>SIPIT DIV.</b>				
2015B	2	Mature	88.62	2.26
2015A	2	Mature	79.67	2.03
2014A	2	Mature	85.31	2.17
2013B	2	Mature	74.83	1.91
2013A	2	Mature	100.09	2.55
2012B	2	Mature	98.62	2.51
2012A	2	Mature	87.65	2.23
2011D	2	Mature	68.19	1.74
2011C	2	Mature	94.41	2.41
2011B	2	Mature	101.44	2.59
2011A	2	Mature	75.64	1.93
2009C	2	Mature	43.42	1.11
2009B	2	Mature	67.40	1.72
2009A	2	Mature	63.39	1.62
<b>KOCHIN DIV.</b>				
96KA	1	Mature	10.00	0.25
96K1A	1	Mature	54.16	1.38
96K1	1	Mature	53.76	1.37
2020C	2	Immature	55.52	1.41
2020D	2	Immature	57.17	1.46
<b>ULU BALUNG DIV.</b>				
2018G	2	Immature	73.77	1.88
2019A	2	Immature	74.61	1.90
2019B	2	Immature	67.50	1.72
2019C	2	Immature	75.61	1.93
2020E	2	Immature	77.92	1.99
Total for GIRAM Estate			3,924.07	100%

**Table 7: Planting profile for Mostyn Estate**

Year of Planting	Planting cycle ( Generation)	Mature / Immature	Planted area ( ha)	Percentage of planted area (%)
2003	3	Mature	63.73	1.80
2003	3	Mature	38.87	1.10
2003	3	Mature	54.71	1.54
2005	3	Mature	70.72	1.99
2007	3	Mature	13.83	0.39
2009	3	Mature	52.01	1.47
2009	3	Mature	102.27	2.88
2009	3	Mature	42.2	1.19
2010	3	Mature	59.51	1.68
2010	3	Mature	45.85	1.29
2010	3	Mature	72.17	2.03
2010	3	Mature	36.8	1.04
2011	3	Mature	78.91	2.22
2011	3	Mature	89.99	2.54
2011	3	Mature	36.79	1.04
2013	3	Mature	101.89	2.87
2013	3	Mature	95.18	2.68
2014	3	Mature	66.34	1.87
2015	3	Mature	32.26	0.91
2014	3	Mature	56.12	1.58
2016	3	Mature	68.5	1.93
2016	3	Mature	43.78	1.23

## RSPO P&C AUDIT REPORT

2017	3	Mature	61.54	1.73
2017	3	Mature	81.24	2.29
2017	3	Immature	101	2.85
2017	3	Immature	36.03	1.02
2018	3	Immature	78.93	2.23
2018	3	Immature	55.07	1.55
2018	3	Immature	64.24	1.81
2018	3	Immature	95.33	2.69
2019	3	Immature	98.62	2.78
2019	3	Immature	93.21	2.63
2020	3	Immature	78.92	2.22
2020	3	Immature	70.29	1.98
2020	3	Immature	62.65	1.77
1957	1	Mature	1.82	0.05
1994	2	Mature	70.14	1.98
1995	2	Mature	14.99	0.42
1996	2	Mature	78.15	2.20
1996	2	Mature	93.1	2.62
1996	2	Mature	86.01	2.42
1997	2	Mature	67.92	1.91
1997	2	Mature	76.77	2.16
1997	2	Mature	57.38	1.62
1997	2	Mature	65.93	1.86
1997	2	Mature	67.21	1.89
1997	2	Mature	76.49	2.16
1998	2	Mature	1	0.03
1998	2	Mature	55.13	1.55
1998	2	Mature	1	0.03
1998	2	Mature	91.45	2.58
1998	2	Mature	48.27	1.36
2002	3	Mature	55.33	1.56
2002	3	Mature	58.23	1.64
2002	3	Mature	65.17	1.84
2002	3	Mature	58.94	1.66
2002	3	Mature	57.32	1.62
Total			3547.25	100%

### 2.3 Organizational Information/Contact Person

The details of the contact person is as shown below:

Name	:	Mohd Esa Bin Mohidin
Position	:	Senior Manager / SOU Giram Chairman
Address	:	Ladang Mostyn, P.O Box 33, 91207, Kunak, Sabah
Phone no.	:	019-3818989
Fax no.	:	NIL
Email	:	<a href="mailto:ldgmostyn@simedarbyplantation.com">ldgmostyn@simedarbyplantation.com</a>

### 3.0 AUDIT FINDINGS

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

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

#### 3.2 Progress and changes in time bound plan (Refer to Attachment 6 for the time bound plan)

- i. Have all the estates under the parent company been ☐ Yes ☒ No  
If no, comments on the organization's compliance with the RSPO partial certification rules:

Details issues related to these were covered in the section - RSPO Certifications Systems for Principles & Criteria June 2017, in this report.

- ii. Are there any changes to the organization's time bound ☐ Yes ☒ No  
If yes, comment in terms of acceptance or non-acceptance on the changes in the time-bound plan?

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

If yes, have ALL the associated smallholders (including ☐ Yes ☒ No  
scheme smallholders) where their fruit supply is included,  
by the mill, in its certification?

If no, please state reasons NA

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

N/A

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

No

## RSPO P&C AUDIT REPORT

### 3.4 Status of previous non-conformities \*

☒ Closed

☐ Not closed\*

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

### 3.5. Complaint received from stakeholder (if any)

No significant complaints from stakeholders were observed.

## 4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s) (details refer to Attachment 4 ) **List : 3** 2.1.3 (RAR 02 2020), 3.3.2 (RAR 03 2020), 4.3.1 (MZK 01 2020)

Total no. of major NCR(s) (details refer to Attachment 4) **List : 4** 2.1.1 (RAR 01 2020), 3.4.3 (MAR 01 2020), 3.7.1 (MAR 02 2020), 6.1.5 (MAR 03 2020)

### 4.2 For SC (Details checklist refer to Attachment 3) :

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

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

## 5.0 AUDIT CONCLUSION

The audit team concludes that the organization has established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.

## RSPO P&C AUDIT REPORT

### 6.0 RECOMMENDATION

☐ No NCR recorded. Recommended to continue certification.

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

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

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

☒ Recommended to continue certification.

☐ **Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s) which have not been satisfactorily closed out within 90 days of the audit. Recommended for suspension of the certificate.**

*Note: Major NCRs which are not addressed within a further 90 days shall result in the certificate being withdrawn.*

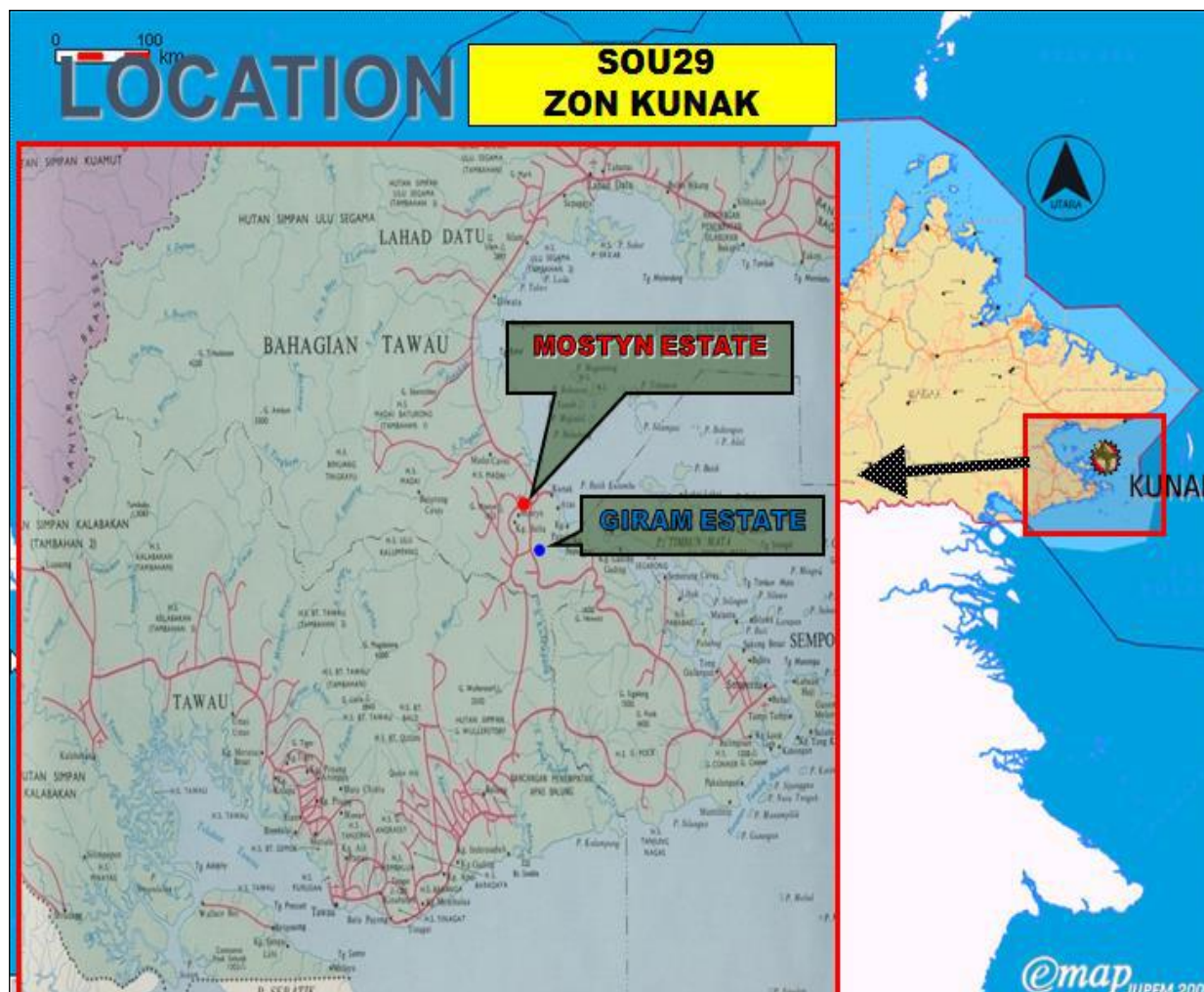
**7.0 IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED. RECOMMENDED FOR CONTINUATION OF RSPO P & C CERTIFICATION.**

**Audit Team Leader :** MOHD AB RAOUF BIN ASIS  
(Name)

  
(Signature)

24/11/2020  
(Date)

**Map SOU 29 GIRAM**



**RSPO RECERTIFICATION AUDIT PLAN****1. Objectives**

The objectives of the audit are as follows:

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

**2. Date of assessment** : 1-4 September 2020

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

- Giram Palm Oil Mill
- Giram Estate
- Mostyn Estate

**4. Scope of certification** : Production of Sustainable Crude Palm Oil and Palm Kernel Using the Mass Balance Supply Chain Model

**5. Reference Standards used**

- (i) RSPO P&C MYNI:2019
- (ii) RSPO Certification Systems, June 2017
- (iii) Company's audit criteria including Company's Manual/Procedures

## 6. Assessment team members

- (i) Audit Team Leader : Mohd Ab Raouf bin Asis - Social (Employees), GAP
- (ii) Auditor : i) Rozaimée bin Ab Rahman - Safety, Environment, TBP  
ii) Mohd Zulfakar bin Kamaruzaman – Supply chain, HCV, Social (land title and external stakeholders)  
*(If there is any objection to the proposed audit team, the organization is required to inform the Lead Auditor/RSPO Section Manager)*
- (iii) Witnessed (ASI) : i) Ms Shikin Rasikon (Lead Auditor)  
ii) Mr Haye Semail (Technical Expert)

## 7. Audit method

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

## 8. Audit Findings

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

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

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

- (i) Language : English
- (ii) Format : Verbal and Written
- (iii) Expected date of issue : 2 weeks after the closure of the Major NC / or if only minor NC, 30 days from the last day of this audit.

12. **Facilities required**

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

13. **Assessment Programme Details :**

**Day 0: 31 August 2020 (Monday)**

**Travelling day – Kul to Tawau Airport via AK5751 ETA 6.55 pm and travel to Guest House**

**Day 1: 1 September 2020 (Tuesday)**

Time	Activities / areas to be visited			Auditee
8.30am	Opening Meeting – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.			
8.45am	Organization Representative - Briefing on RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings. Logistics discussion to the sites to be visited.			Management Representative
9.00am	To assign each audit team members – site and the P&C requirements			
	<b>Raouf (Giram POM)</b>	<b>Zulfakar (Giram POM)</b>	<b>Rozaimie (Giram Estate)</b>	
	Site visit and assessment on implementation: <ul style="list-style-type: none"> <li>• Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>• Land titles user rights</li> <li>• Stakeholder consultation with affected communities surrounding the CU</li> <li>• Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>• Linesite inspection</li> <li>• Complaints and grievances</li> <li>• Consultation with relevant government agencies</li> <li>• Training and skill development programs</li> </ul>	Site visit and assessment on Supply Chain Implementation including the <ul style="list-style-type: none"> <li>• Model used</li> <li>• General Chain of Custody</li> <li>• System Requirements for the supply chain</li> <li>• Documented procedures</li> <li>• Purchasing and goods in</li> <li>• Outsourcing activity</li> <li>• Sales and goods out</li> <li>• Processing</li> <li>• Records keeping</li> <li>• Registration</li> <li>• Training</li> <li>• Claims</li> </ul>	Site visit and assessment on implementation: <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Environmental management – witness activities at site</li> <li>• Occupational safety &amp; health practice – witness activities at site</li> <li>• Chemical store/fertilizer</li> <li>• Plantation on hilly/swampy area</li> </ul> IPM implementation, training and safe use of agro-chemicals. <ul style="list-style-type: none"> <li>• Waste &amp; chemical management</li> <li>• Interview with workers, safety committee and contractors</li> <li>• Facilities at workplace</li> </ul>	Guide(s) for each auditor

			<ul style="list-style-type: none"> <li>• Training and skill development programmes</li> <li>• Continuous improvement</li> <li>• Time bound plan and uncertified management units</li> </ul>	
1.00pm	<b>LUNCH BREAK / ZUHUR PRAYER</b>			All
2.00pm	Continue assessment at Giram POM	Continue assessment at Giram POM	Continue assessment at Giram Estate	
4.00 - 5.00pm	Audit team discussion / End of Day 1 audit			All

**Day 2: 2 September 2020 (Wednesday)**

Time	Activities / areas to be visited			Auditee
8.30am	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements			Respective Scheme Manager
8.30am	To assign each audit team members – site and the P&C requirements			Guide(s) for each auditor
	<b>Raouf (Mostyn Estate)</b> <ul style="list-style-type: none"> <li>• Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>• Stakeholder consultation with affected communities surrounding the CU</li> <li>• Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>• Linesite inspection</li> <li>• Complaints and grievances</li> <li>• Consultation with relevant government agencies               <ul style="list-style-type: none"> <li>• New planting</li> <li>• Continuous improvement</li> </ul> </li> </ul>	<b>Zulfakar (Mostyn Estate)</b> <ul style="list-style-type: none"> <li>• Land titles user rights</li> <li>• Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>• Inspection of protected sites with HCV attributes</li> <li>• Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• HCV Assessment management plan &amp; implementation</li> <li>• Training and skill development programs</li> </ul>	<b>Rozaimie (Giram POM)</b> <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Environmental management – witness activities at site</li> <li>• Waste &amp; chemical management</li> <li>• Interview with workers, safety committee and contractors</li> <li>• Facilities at workplace</li> <li>• Occupational safety &amp; health practice – witness activities at site</li> <li>• Training and skill development programmes</li> <li>• Continuous improvement</li> </ul>	Guide(s) for each auditor
1.00pm	<b>LUNCH BREAK / ZUHUR PRAYER</b>			All
2.00pm	Continue assessment at Mostyn Estate	Continue assessment at Mostyn Estate	Continue assessment at Giram POM	Guide(s) for each auditor
4.00 - 5.00pm	Audit team discussion / End of Day 2 audit			All

### Day 3: 3 September 2020 (Thursday)

Time	Activities / areas to be visited			Auditee
8.30am	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements			Respective Scheme Manager
8.30am	To assign each audit team members – site and the P&C requirements			Guide(s) for each auditor
	<b>Raouf (Giram Estate)</b>	<b>Zulfakar (Giram Estate)</b>	<b>Rozaimiee (Mostyn Estate)</b>	Guide(s) for each auditor
	<ul style="list-style-type: none"> <li>Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>Stakeholder consultation with affected communities surrounding the CU</li> <li>Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>Linesite inspection</li> <li>Complaints and grievances</li> <li>Consultation with relevant government agencies                             <ul style="list-style-type: none"> <li>New planting</li> <li>Continuous improvement</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Land titles user rights</li> <li>Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>Inspection of protected sites with HCV attributes</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>HCV Assessment management plan &amp; implementation</li> <li>Training and skill development programs</li> </ul>	<ul style="list-style-type: none"> <li>Laws and regulations</li> <li>Environmental management – witness activities at site</li> <li>Waste &amp; chemical management</li> <li>Interview with workers, safety committee and contractors</li> <li>Facilities at workplace</li> <li>Occupational safety &amp; health practice – witness activities at site</li> <li>Training and skill development programmes</li> <li>Continuous improvement</li> </ul>	
1.00pm	<b>LUNCH BREAK / ZUHUR PRAYER</b>			All
2.00pm	Continue assessment at Giram Estate	Continue assessment at Giram Estate	Continue assessment at Mostyn Estate	Guide(s) for each auditor
4.00 - 5.00pm	Audit team discussion / End of Day 3 audit			All

### Day 4: 4 September 2020 (Friday)

Time	Activities / areas to be visited			Auditee
8.30am	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements			Respective Scheme Manager
8.30am	To assign each audit team members – site and the P&C requirements			Guide(s) for each auditor
	<b>Raouf (Giram Estate)</b>	<b>Zulfakar (Giram Estate)</b>	<b>Rozaimiee (Giram Estate)</b>	Guide(s) for each auditor
	<ul style="list-style-type: none"> <li>Social aspects - SIA, management plan &amp;</li> </ul>	<ul style="list-style-type: none"> <li>Land titles user rights</li> </ul>	<ul style="list-style-type: none"> <li>Laws and regulations</li> </ul>	

	<ul style="list-style-type: none"> <li>implementation, workers' quarters.</li> <li>Stakeholder consultation with affected communities surrounding the CU</li> <li>Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>Linesite inspection</li> <li>Complaints and grievances</li> <li>Consultation with relevant government agencies               <ul style="list-style-type: none"> <li>New planting</li> <li>Continuous improvement</li> <li>To continue on unfinished area</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>Inspection of protected sites with HCV attributes</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>HCV Assessment management plan &amp; implementation</li> <li>Training and skill development programs</li> <li>To continue on unfinished area</li> </ul>	<ul style="list-style-type: none"> <li>Environmental management – witness activities at site</li> <li>Waste &amp; chemical management</li> <li>Interview with workers, safety committee and contractors</li> <li>Facilities at workplace</li> <li>Occupational safety &amp; health practice – witness activities at site</li> <li>Training and skill development programmes</li> <li>Continuous improvement</li> <li>To continue on unfinished area</li> </ul>	
10.00am	Verification on outstanding issues for CU Auditor to inform auditee on the required document / records Continue Audit Team discussion and preparation of assessment findings.			All
11.00am	Discussion and acceptance on assessment findings with Management Representative. Closing meeting at CU			Guide(s) for each auditor

**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 and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	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 internet 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 <a href="http://www.simedarbyplantation.com/">http://www.simedarbyplantation.com/</a> . For social programmes on education, environment, community and health, etc, Yayasan Sime Darby as the Foundation has expanded its wings from offering scholarships to outstanding and deserving individuals to funding impactful conservation, outreach and development programmes. The SDPSB website address <a href="http://www.yayasansimedarby.com/">http://www.yayasansimedarby.com/</a> . Figures of gender distribution within all workers categorised by management, administrative staff and workers (both permanent casual workers, piece rate workers) were made available at estate and mill office with record titled 'SEMUA – EMPLOYEE MASTER LISTING'.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	SDPSB continued to use the internet to disseminate public information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances. The SDPSB website address is available in English at <a href="http://www.simedarbyplantation.com/">http://www.simedarbyplantation.com/</a> . During this Recertification audit Auditor has verified the details of information for every each of estates through SEMUA system and also the Land Title, all the information are correct as per stated in Land Title.
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	<b>Remote</b> Giram CU has continued to implement the communication procedure. At the point of audit, there was no request for information from the stakeholders. Giram POM, Giram Estate and Mostyn Estate management documents relating to environment, social and legal issues were made available to the public except for those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. Furthermore, SDPB continues to use the internet for disseminating public information. Information related to land titles, safety and health plans, pollution prevention plans and

Clause	Indicators	Comply Yes/No	Findings
			<p>the procedure for complaints and grievances were available through SDPSB website at <a href="http://plantation.simedarby.com">http://plantation.simedarby.com</a></p> <p>Giram CU had maintained record of request from several authority for example on line reporting to DOSH related to renewal of certificate of fitness, MPOB related to FFB process, CPO and PK production(e-MPOB) and DOE related to effluent discharge (OER).</p> <p>The following records were reviewed and therefore it can be verified that the estates and palm oil mill provide adequate information upon request received from relevant stakeholders.</p> <p>Giram Estate</p> <ul style="list-style-type: none"> <li>DOSH visit to conduct accident investigation on 10/02/2020, results from the investigation indicated that corrective action has been taken by management accordingly.</li> </ul> <p>Mostyn Estate</p> <ul style="list-style-type: none"> <li>DOSH visit on 26/08/2019 to inspection related to sudden death of lorry driver.</li> <li>DOSH visit on 19/02/2020 to conduct machinery inspection SB PMT 9281.</li> </ul> <p>Result from the assessment were indicate the equipment in good condition.</p> <p><b>Onsite</b></p> <p>Management documents relating to environment, social and legal issues, were available to the public except for those prevented by commercial confidential or where disclosure of information would result in negative environmental or social outcomes. The CU has provided relevant information (environmental, social and/or legal) as requested by the relevant stakeholder during the annual stakeholder meeting and also where requested during annual audit by SIRIM. Below are some of the documents requested:</p> <ol style="list-style-type: none"> <li>Social impact assessment dated September 2013 and reviewed on annual basis.</li> <li>Contract agreement, payslip and check roll for the latest three (3) months since audit.</li> <li>Complaints and grievances records for the current year.</li> <li>Scheduled waste inventories.</li> <li>Environmental impact assessment</li> </ol>

Clause	Indicators	Comply Yes/No	Findings
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	<b>Remote</b> SOU Giram continued to implement the communication procedure and maintain records on requests for information. The procedure for responding to any communication is as outlined in 'Documentation and Communication Procedure – Manual Sustainable Plantation Management System'. <b>Onsite</b> The procedure was made available on the notice boards in the Estate and Mill offices and Muster Grounds.
	<u>AUDITORS' GUIDE:</u> 1) Make sure relevant consultation and communication are properly documented and available for review during audit. The process description shall be clear for reference. 2) Obtain information on how relevant procedures were circulated to employees and the awareness process i.e. a) Type of contract – daily rate or piece rate. Overtime? b) Mechanism for handling of complaint from internal/external stakeholders. c) Workers understanding and awareness.		
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	All units within SOU 29 Giram has its own stakeholder list. For the Giram Palm Oil Mill, the stakeholder list was updated on 3 Jan 2020 which includes local communities, government agencies, schools, hospitals, clinics, bomba, etc. contractors (service/supply) and a separate list dated 1 Dec 2019 for transporters.
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	Units within the SOU 29 Giram subscribes to the Sime Darby Plantations Group's Code of Business Conduct (COBC). This Code applies to all its employees, counterparts, business partners, affiliates and associates. Among the contents of the COBC include avoiding conflict of interest, guarding against bribery and corruption, ethics on gifts and corporate hospitality, donations and sponsorships, dealing with counterparts and business partners, government agencies and public officials.  Awareness training on the COBC was given to all levels of employees as evidenced from training records at the Giram Palm Oil Mill (6 Jan 2020), Giram Estate (24 Jan 2020) and Mostyn Estate (13 Jan 2020). The training was also given to external stakeholders during stakeholder meeting held on 7 January 2020. The training module sighted for the COBC training include support fundamental human rights, bribery, conflict of interest, ways to lodge complaint, whistle blowing policy, and confirmed by workers during audit interviews.  In addition to the COBC, Sime Darby Plantation Group also has a Vendor COBC (VCOBC). The Vendor COBC applies to all its suppliers, consultants, agents, contractors /service providers who have direct dealings with the Group. The VCOBC outlines the standards of behaviour required of all its vendors which includes in relation to labour and

Clause	Indicators	Comply Yes/No	Findings
			human rights, ethics and management practices. Vendors too are required to sign Vendor Integrity Pledge which includes a declaration to eradicate all forms of exploitation, including but not limited to modern day slavery and human trafficking.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	<p><b>Remote</b> SDPB 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. The Vendor COBC applies to all its suppliers, consultants, agents, contractors /service providers who have direct dealings with the Group. All vendors will be required to declare their compliance to the Vendor COBC through the Sime Darby Berhad Vendor Integrity Pledge which includes a declaration to eradicate all forms of exploitation, including but not limited to modern day slavery and human trafficking.</p> <p><b>Onsite</b> The system in place to monitor compliance and implementation of the Policy and overall business conducts include trainings and internal audits conducted by the Group Integrity &amp; Group Assurance Unit from HQ. Training for managers, assistant managers and executives which was held for the SOU Giram on 15 Jan 2020.</p>

## **Principle 2: Operate legally and respect rights**

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 local, national and ratified international laws and regulations.	<p>2.1.1 (C) The unit of certification complies with applicable legal requirements.</p> <p><u>AUDITORS' GUIDE:</u>  1) <i>Relevant legal requirement might differs between states in Malaysia i.e. peninsular, Sabah &amp; Sarawak.</i>  2) <i>Give focus on social related legal requirement such as Sabah Labour Ordinance, Child Rights &amp; Protection, Human Rights, Immigration Act, Passport Act, etc.</i>  3) <i>Please note on the process of the following during audit (where applicable):</i>  i) <i>foreign workers legalization (Program Pemutihan),</i>  ii) <i>foreign workers recruiting through agent and</i></p>	NO	<p>Generally, SOU 29 Giram continue to comply with applicable local, national and ratified international laws and regulations.</p> <p>Giram <u>Estate</u></p> <ul style="list-style-type: none"> <li>• MPOB license no: 528841002000 valid until 31/03/21</li> <li>• JTK permit for hired foreign workers, license no: JTK.H.KNK.600-4/1/01261/0032 valid until 09/06/21.</li> <li>• Permit for trespassing Hutan Simpan Ulu Kalumpang valid until 10/10/20.</li> <li>• However, Recommendation made by CHRA assessor for Water treatment plant (Table D3) to install emergency shower was not complied. Thus, <b>MAJOR NCR RAR 01 2020 has been raised</b></li> </ul> <p><u>Mostyn Estate</u></p> <ul style="list-style-type: none"> <li>• MPOB license no: 528334002000 valid until 31/03/2021.</li> </ul>

Clause	Indicators	Comply Yes/No	Findings
	<p><i>quota basis vs walk-in application</i></p> <p><i>iii) Immigration permit renewal process.</i></p>		<ul style="list-style-type: none"> <li>JTK permit for hired foreign workers, llicense no: JTK.H.KNK.600-4/1/A01/0033 valid until 13/05/21</li> <li>Air compressor permit SB PMT 1587 &amp; SB PMT 1592 valid until 07/10/2020 &amp; 07/10/2020</li> <li>JTK permit for salary deduction valid until 31/01/2021</li> <li>Permit for diesel storage , siri no: S001572 valid until 16/12/20.</li> <li>Permit for petrol storage, siri no: S001562 valid until 12/01/21.</li> </ul> <p>Giram POM</p> <ul style="list-style-type: none"> <li>MPOB license no: 530359004000 valid until 31/05/2021</li> <li>License to hired foreign workers, license no: JTK.H.KNK.600-4/1/0401/0943 valid until 15/01/2021.</li> <li>JTK permit for salary deduction valid until 31/01/2021.</li> <li>DOE license “Jadual Pematuhan” license no: 003573, valid until 30/06/2020.</li> <li>Weighbridge permit B610190079 valid until 03 /12/2020</li> <li>Weighbridge permit B602991433 valid until 04/06/2021</li> <li>fire certificate valid until 30/12/20</li> <li>DOE license no: 003585 valid until 30/06/2021</li> <li>Jadual Pematuhan for Udara Bersih 2014, license no : 005138 valid until 29/08/21.</li> </ul> <p><b>CF</b></p> <ul style="list-style-type: none"> <li>Air Receiver – SB PMT 719 valid until 21/10/20</li> <li>Boiler – PMD 10604 valid 16/06/21</li> </ul> <p>Dust emission measurement on chimney no 1 &amp; no 2 has been carried out on 21/05/2020 by SAHEN engineering Sdn bhd. Results for chimney no.1 i.e. 206.53 &amp; no. 2 i.e. 174.98 were not exceedin the requirements as per the Jadual Permatuhan (400mg/m3).</p> <p><b>Final discharge</b></p> <ul style="list-style-type: none"> <li><b>Licence no: 003585 valid until 30/06/21</b></li> <li><b>Land irrigation</b></li> <li><b>Process capacity 60mt</b></li> </ul> <p><b>Noise Exposure Regulations 1989</b></p> <p>For year 2020 audiogram test has been conducted on 20/07/2020 for 93 workers/staff by a registered OHD (JKKP No HQ/08/DOC/00/695) by Dr Ahmad Mansor Bin Osir from Klinik Mansor. However, the result is still not yet received.</p>

Clause	Indicators	Comply Yes/No	Findings
			<p><b><u>OSH (Use and Standards Of Exposure of Chemicals Hazardous to Health Regulations 2000)</u></b>  CHRA for Giram POM was conducted on 24/07/19 by Mr Tan Tiong Ping from Global Safe T Sdn Bhd (Dosh registration no: HQ/03/ASS/00(160). The asseesments has been carried out to laboratory and operation operator</p> <p>As per the recommendation from the CHRA, medical surveillance has been carried out by Dr Ahmad Mansor Bin Osir (dosh reg no: HQ/08/DOC/00/695) from Klinik Mansor Sdn Bhd on 11/08/2020 for exposure to benzene &amp; hexane (11 employees- lab operator), exposure to manganese (13 foremen), and exposure to calcium carbonate (6 kernel plant operator and store) results from assessments were fits to handle chemicals.</p> <p><b><i>Code of Practice in Confined Space 2010</i></b>  Health surveillance has been carried out on 11/08/2020 by a registered OHD (JKKP No HQ/08/DOC/00/695) by Dr Ahmad Mansor Bin Osir from Klinik Mansor. Results from assessment was satisfactory and all the employees were fit physically and mentally to work in the confined space.</p> <p>Scheduled waste regulation</p> <ul style="list-style-type: none"> <li>• Inventory latest 29/08/20</li> <li>• Latest disposed to Lagenda Bumimas Sdn Bhd, on 19/06/20 for SW 410, SW 409, SW 323, SW 322, SW 306, SW 305, SW 102</li> </ul>
	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.	YES	<p>A mechanism to ensure compliance to legal and other requirement has been documented in EQMS &amp; MQMS (Estate &amp; Mill Quality Management System) under Standard Operation Manual distributed to all operating units Giram CU. SQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance. The document used are as follows;</p> <ol style="list-style-type: none"> <li>Estate/Mill Quality Management System</li> <li>Level 2: Standard Operating Manual</li> <li>Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.</li> </ol> <p>The CU had a documented system for identifying, updating changes to legal requirements and to monitor the status of legal compliance in their EQMS &amp; MQMS (Estate &amp; Mill Quality Management System) included under the Standard Operation Manual. There was evidence of compliance to legal requirements and that it had been evaluated on an annual basis. These compliances were also ensured by SQM Internal Audits, PA visits and by RSPO Audits. The CU has conducted internal audit to check status of compliance with</p>

Clause	Indicators	Comply Yes/No	Findings
			legal requirements annually. Workplace inspection has been carried out by quarterly basis and has been presented during ESH meeting. Among of workplace areas have been covered such as ramp, store, engine room, workshop, etc. to prevent any all equipment was in good condition to human and environment.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	NO	Giram Estate and Mostyn Estate has visibly maintained its boundary pegs adjacent with Ulu Kalumpang Forest Reserves (Sipit Division), Borneo Samudera Estate (Ulu Balung Division), Intan Plantation Sdn Bhd (Main Division) and Kg. Skim Cocos (Main Division). Auditor also verified boundary area between Sipit Division (Giram Estate) and KLK Plantation, the boundary pegs were already visible and maintained. During the site visit at Mostyn Estate, it was noted that the estate had managed to locate boundary pegs adjacent with forest reserves 'Madai Baturong VJR' and 'Kalumpang VJR' and also local villagers named Kg. Simpang 4, Kg. Kadazan, Kg. Sg. Langgas, Kg. Seri Bahagia, Kampung Cina, Kg Mostyn and Kg Mostyn Lama.  However, At Giram Estate (Ulu Balung Division) boundaries between estate and Ulu Kalumpang Reserve Forest was not clearly demarcated and maintained. At Mostyn Estate boundaries between smallholder at Block 09B was not clearly demarcated and maintained. Therefore, minor NCR has been raised as RAR 02 2020.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	YES	The list of contracted parties are available in the stakeholder lists of all units within SOU 29 Giram, and duly updated when necessary. They include harvesting contractors, suppliers, transporters, replanting contractors, etc.
	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	There is evidence that agreements with third parties contain clauses on meeting applicable requirements. Sampled during the audit were the following agreements: <ul style="list-style-type: none"> <li>a. Agreement between Sime Darby Plantation Berhad and Pengangkutan Bumi Sdn Bhd, PA Tech, Rimbun Hijau, Ridwan Muhammad Daud and Wah Len. Clause 16 of the said agreement contains a provision on compliance with legal requirements.</li> <li>b. Agreement between Sime Darby Plantation Berhad and FFB Supplier Koperasi Felcra ladang Giram Cocos, Pa Tech Sdn Bhd, Wah Len Enterprise Sdn Bhd . Clause 16 of the said agreement contains a provision on compliance with legal requirements.</li> <li>c. Agency agreement between SDPB and PT Wira Karitas dated 22 April 2019 where PT Wira Karitas would supply manpower based on criteria specified by SDPB. Clause 8.1 of the Agency Agreement stipulates that the agent will comply with all applicable laws and regulations, and comply with Sime Darby's Vendor Code of Ethical Conduct.</li> <li>d. Agency agreement between SDPB and PT Cahaya Lombok dated 22 April 2019</li> </ul>

Clause	Indicators	Comply Yes/No	Findings
			<p>where PT Cahaya Lombok would supply manpower based on criteria specified by SDPB. Clause 8.1 of the Agency Agreement stipulates that the agent will comply with all applicable laws and regulations, and comply with Sime Darby's Vendor Code of Ethical Conduct.</p> <p>Evidence of legal due diligence carried out include getting the vendors to sign the Vendor Integrity Pledge where they undertake to comply with rules relating to labour and human rights, company ethics and management practices, and would comply with all laws and regulations relating to anti-bribery, fraud and corruption. Sampled during the audit were Vendor Integrity Pledges signed by Ooi Trading, Rimbun Hijau, Pengangkutan Bumi Sdn Bhd, PA Tech, Rimbun Hijau, Ridwan Muhammad Daud and Wah Len. The Vendor Integrity Pledges however were undated. Additionally, contractors' background checks were also done as sighted at Mostyn and Giram Estate. Corporate background was also sought before a contract was signed.</p>
	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	<p>All contracts signed with contractors contain a clause on compliance with employment laws, which would include laws related to employment of children and young persons. Sampled during the audit was contract signed between Sime Darby Plantations Berhad with Rimbun Hijau &amp; Pengangkutan Bumi Sdn Bhd on 19 Dec 2017.</p> <p>Contractors also sign the Vendor Integrity Pledge in which Vendors undertake to comply with the Vendor COBC. The Vendor COBC in turn, contains provisions which state that Vendors shall not employ anyone under the age of 18 or the applicable minimum legal age in the countries they operate, unless in vocational and/ or formal and structured apprenticeship, educational and training programmes.</p> <p>Based on records available, interviews conducted and observations made during the audit, there was no evidence of any young persons employed within SOU Giram.</p>
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: <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins.</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> </ul>	YES	<p>Giram POM is currently on the drafting for the following for the directly source of FFB:</p> <ol style="list-style-type: none"> <li>Information on geo-location of FFB origins.</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> </ol> <p>The evidence of currently document in draft is available in the 'Desktop Review Assessment for New OCP Suppliers'. At present the mill only possessed the valid MPOB licenses and OCP Land Title for all the directly source FFB as verified by the auditor. RSPO has provided the timeline which is 1 year from date of launch of MYNI for the mill to obtain and compile the information above.</p>
	2.3.2 For all indirectly sourced FFB, the unit of cert. obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	YES	Currently in Giram POM there is no indirectly source of FFB. All FFB are received direct from the suppliers.

### **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 economic and financial viability.	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	<p>Giram SOU continued to achieve long term economic and financial viability through documented management plan projected to year 2021. A business plan including crop forecast, capital expenditure, operational expenditure, general charges, profit and loss covering the period of 2019 to 2021 had been prepared for both estates and made available to the audit team.</p> <p>Giram Estate</p> <table><tr><th></th><th>2020</th><th>2021</th><th>2022</th></tr><tr><td>Mature ha</td><td>3182.44</td><td>3183.90</td><td>3364.77</td></tr><tr><td>Immature ha</td><td>741.63</td><td>740.17</td><td>559.30</td></tr><tr><td>Total ha</td><td>3924.07</td><td>3924.07</td><td>3924.07</td></tr><tr><td>FFB tons</td><td>70586.52</td><td>73011.60</td><td>78139.50</td></tr><tr><td>Yld/ha</td><td>22.18</td><td>23.15</td><td>23.22</td></tr><tr><td>Cost /mt FFB</td><td>222.12</td><td>202.65</td><td>196.37</td></tr><tr><td>Cost/ha</td><td>4926.55</td><td>4690.92</td><td>4560.32</td></tr></table> <p>Mostyn Estate</p> <table><tr><th></th><th>2020</th><th>2021</th><th>2022</th></tr><tr><td>Mature ha</td><td>2908.19</td><td>2690.35</td><td>2690.35</td></tr><tr><td>Immature ha</td><td>685.66</td><td>903.50</td><td>903.50</td></tr><tr><td>Total ha</td><td>3583.85</td><td>3583.85</td><td>3583.85</td></tr><tr><td>FFB tons</td><td>64383.12</td><td>59841.59</td><td>60061.49</td></tr><tr><td>Yld/ha</td><td>22.14</td><td>21.93</td><td>22.19</td></tr><tr><td>Cost /mt FFB</td><td>254.07</td><td>248.56</td><td>232.91</td></tr><tr><td>Cost/ha</td><td>5714.30</td><td>5730.60</td><td>5638.30</td></tr></table>		2020	2021	2022	Mature ha	3182.44	3183.90	3364.77	Immature ha	741.63	740.17	559.30	Total ha	3924.07	3924.07	3924.07	FFB tons	70586.52	73011.60	78139.50	Yld/ha	22.18	23.15	23.22	Cost /mt FFB	222.12	202.65	196.37	Cost/ha	4926.55	4690.92	4560.32		2020	2021	2022	Mature ha	2908.19	2690.35	2690.35	Immature ha	685.66	903.50	903.50	Total ha	3583.85	3583.85	3583.85	FFB tons	64383.12	59841.59	60061.49	Yld/ha	22.14	21.93	22.19	Cost /mt FFB	254.07	248.56	232.91	Cost/ha	5714.30	5730.60	5638.30
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	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	The long-range replanting program (LRRP) until 2024 was sighted for all the estates. This program is reviewed once a year and incorporated into their annual financial budget. The program for the next 5 years in hectares is as follows:																																																																

Clause	Indicators	Comply Yes/No	Findings																		
			<table><tr><th>Year</th><th>Giram Estate</th><th>Mostyn Estate</th></tr><tr><td>2021</td><td>318.91</td><td>194.85</td></tr><tr><td>2022</td><td>304.83</td><td>169.59</td></tr><tr><td>2023</td><td>257.48</td><td>177.11</td></tr><tr><td>2024</td><td>302.46</td><td>209.32</td></tr><tr><td>2025</td><td>286.91</td><td>144.69</td></tr></table>	Year	Giram Estate	Mostyn Estate	2021	318.91	194.85	2022	304.83	169.59	2023	257.48	177.11	2024	302.46	209.32	2025	286.91	144.69
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	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	<p><u>Mostyn Estate</u> Internal audit has been carried out on 12/02/2020, conducted by GSQM. As the results from the assessment, 1 major and 2 OFI have been raised to CU. Management review has been carried out on 20/02/2020.</p> <p><u>Giram Estate</u> Internal audit has been carried out on 13/02/2020, conducted by GSQM. As the results from the assessment, 4 major and 2 minor have been raised to CU. Management review has been carried out on 27/02/2020.</p> <p><u>Giram POM</u> Internal audit has been carried out on 14/02/2020, conducted by GSQM. As the results from the assessment, 4 major have been raised to CU. Management review has been carried out on 19/02/2020.</p> <p>The management review meetings discussed issues related to RSPO/MSPO internal audit results and corrective action taken to address the assessment findings. For reviewing process performance, management carried out the internal meeting while during muster call, they discussed crop quality.</p>																		
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	<p><b>Remote</b> The action plans for continuous improvement are:</p> <ol style="list-style-type: none"><li>1. Optimising the yield of the supply base.</li><li>2. Reduction in use of pesticides</li><li>3. Environmental impacts</li><li>4. Waste reduction</li><li>5. Pollution and greenhouse gas (GHG) emissions</li><li>6. Impacts on communities, workers and smallholders</li></ol>																		

Clause	Indicators	Comply Yes/No	Findings
implements action plans that allow demonstrable continuous improvement in key operations.			<p>7. Integrated management of HCV-HCS, peatland and other conservation areas</p> <p><b>Onsite</b></p> <p>The management documents in relation to environmental plans and impact assessments were made available and maintained at all audited operating units. The documents among others as listed below; Among the documents were:</p> <ul style="list-style-type: none"> <li>a) Social Impact Assessment</li> <li>b) Management Plan on Social Impact Assessment – FY2020</li> <li>c) Environmental Aspect Identification (EAI) and Environmental Impact Evaluation (EIE) registers.</li> <li>d) Pollution Prevention Plan – FY2020.</li> <li>e) Identification and Management of Wastewater – FY2020.</li> <li>f) Contingency plan during water shortage – FY2020.</li> <li>g) Action plan to reduce freshwater usage - FY2020.</li> <li>h) Water management plan – FY2020.</li> </ul>
	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.	N/A	NOT APPLICABLE
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	<p>Giram CU adopted the following manuals / guidelines for the day-to day operations of the estates and mill. It includes the operation activities in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security.</p> <ul style="list-style-type: none"> <li>a) Agriculture Reference Manual (ARM) dated 01/07/2011.</li> <li>b) Estate Quality Management System (EQMS) Manual dated 01/11/2008,</li> <li>c) Safety Standard Operating Procedures (SSOP) dated 25/02/2015,</li> <li>d) Sustainable Plantation Management System Manual (SPMS),</li> <li>e) Guidelines on River Management Manual,</li> <li>f) ESH Management System Manual dated 01/07/2012,</li> <li>g) Occupational Safety and Health Manual dated 03/03/2008,</li> <li>h) Pictorial Safety Standards and Security Guidelines (PSS).</li> </ul> <p>All the estates and mill operations were guided through the manuals and SOPs. The procedures as documented in the Agriculture Reference Manual were disseminated to the staff/workers through morning briefings and trainings. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. Field inspection and interviews with the workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs. The SOPs included the operation activities in the estates and the mills from seedlings in nursery to planting of</p>
	<p><u>AUDITORS' GUIDE:</u></p> <p>1) Apart from operational procedures to the mill &amp; plantation, ask for procedures on how the company manage their foreign workers and workers recruitment through contractors as these issues were considered as high-risk i.e. recruitment process, training, benefits, probation, payment of wages, renewal and management of permit/passport etc.</p>		

Clause	Indicators	Comply Yes/No	Findings
			<p>young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and dispatch of CPO &amp; PK and security in the CU.</p> <p>The mill processing system is documented in the Sustainability Plantation Management System MQMS/SQM/08 v 1 dated 01/11/2008 which includes the mill SOP, and Mill Quality Management Manual v.1 2008/MQMS/QMM/08. These documents provide guidelines and standards in the mill operations. The Standard Operating procedures (SOPs) described details from the reception, sterilisation, threshing, pressing, clarification, nut polishing station, effluent, laboratory, workshop, dispatches etc. In addition, there are also manuals available within the industry and MPOB that are used as guidelines.</p> <p>The procedures were communicated to workers through training and infield supervision. Interview with workers showed that the information in the procedures had been effectively communicated. Site inspection and interview with workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs.</p>
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	NO	<p>The mechanisms to check the implementation of procedures were carried out through internal audit, safety and health meeting and routine inspection (workplace inspection) by Assistant Managers, Engineers, field and office staff including the Medical Assistant.</p> <p>a) In additional team Performance monitoring unit – structure crop recovery assessment team (for estate) structured oil recovery assessment (for mill) from HQ has conducted quarterly monitoring regarding on quality of implementation procedure such as loose fruit collection, harvested bunch left and unharvested bunches, Safe working condition, mechanization, oil losses, etc.</p> <p>b) During the site visit at both estates/mill all workers were in proper PPE i.e. helmet, gloves, mask, apron, sickle cover, internal management for the estates also implemented daily inspection vehicle (farm tractor) to monitor there was no leakage and missing bolt from tractor or vehicle tyres.</p> <p>c) The mill produces daily production report having details i.e. FFB processed, ramp balance, CPO/CPK stock lab results, downtime and throughput figures among others. This is recorded in the SEMUA system format.</p> <p>d) Monitoring from SW competent person for SW record, disposal and DOE contractor. Currently, management has selected Lagenda Bumi Mas (approval DOE contractor).</p> <p>However, the procedure for Operational Control Procedure, Personal Protective Equipment Document no. : SD/SDP/PSQM(ESH)/201-OS16 and SOP EQMS- HIRARDC Procedure- no 7.3 - Risk assessments (b) probability of an occurrence was not effectively implemented. During interviews session at Giram Estate (Ulu Balung Division) with the general workers, it was found that the PPE (rubber boot) was provided to general wokers once only and there was no recorded issuance for all of them. With regards to the risk</p>

Clause	Indicators	Comply Yes/No	Findings
			assessments for activities i.e. Harvesting – walking from palm to palm - Probability of an occurrence value has not been increased to value 4 for repeated case (more than 1 case in 3 years). Therefore, minor NCR has been raised as RAR 03 2020.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	Records of monitoring and the actions taken by the SOU Giram continued to be maintained. This is to ensure that the established procedures were consistently implemented. Among the monitoring records sighted were: •Harvesting Interval record. Interval observed varies around 9 to 10 days. •FFB quality is monitored through infield FFB grading conducted by the management on daily basis. •Progress report of application of fertilizers. The work progress was generally on schedule. •Work Program Sheets, Field cost books, Bin cards, Monthly Progress & Report Account, rainfall data, etc. Harvesting standards were monitored using SDPB's Plantation Micro Macro Program (PMMP) There were system of having other audits by PSQM, Agronomist and GCAD to ensure compliance against Company policies and procedures in relation to operations, finance, safety, health and welfare requirements. The Regional Head also performed unscheduled visits to the SOUs. Performances are tabled and discussed in the monthly SOU and Regional meetings. Environmental related records of monitoring and any actions observed maintained and available. Among of environmental related records of monitoring observed were: <ul style="list-style-type: none"> <li>records related to inventory and disposal of scheduled wastes.</li> <li>records related to disposal of domestic wastes.</li> <li>records related to analysis of effluent.</li> <li>records related to analysis of black smoke and dust particulate.</li> </ul> Records related to actions plan to install ESP dust collector and new bigger turbine for reduction of black smoke opacity and dust particulate were also made available. The estates had sent water samples to Sime Darby Research accredited Laboratory. Analysis was made based on the guidelines and the required WHO standard as described in the SOP. Results of the analysis were sighted and verified.
	<b>AUDITORS' GUIDE:</b> 1) Records are essential evidence for implementation. 2) Some records related to migrant workers employment were; a) the monitoring of fees that migrant workers pay before they depart from their home country, b) demand letters, c) MoUs and agreements between recruitment agents the CH and the consulates/embassies for the migrant workers. 3) The company should provide relevant records as evidence on how they manage and monitor their contractors' compliance against the RSPO requirements e.g. legality of the workers, appropriate license, employment contract, insurance and wages, for the workers employed thru the contractors. 4) Records of new workers recruitment process, training, benefits, probation, renewal of permit/passport shall be sampled and reviewed.		
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a	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	The SIA has been carried out for SOU 29 Giram and a report dated September 2013 was produced and sighted during the audit. The SIA consultations for Giram Estate, Giram Palm Oil Mill and Mostyn Estate were carried out on 28/08/2013, 27/08/2013, and 29/08/2013, respectively. Records of all consultation meetings were documented and sighted. Based on the SIA report and the stakeholder consultations/meetings attendance records available, there is evidence that the SIA was carried out with the participation of the affected parties. The stakeholder consultations/meetings were attended by the local communities, mandores, workers (harvesters, loaders, drivers, loose fruit collectors,

Clause	Indicators	Comply Yes/No	Findings																																								
social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			<p>watchmen, manurers, spayers, and security personnel).</p> <p>The EAI as detailed in the estates register covers all estates activities/operations. The latest register being reviewed dated January for continued use in 2020. Among others the significant environmental aspects related to the estate operation including the activities from;</p> <table><tr><th></th><th>Areas/Activities</th><th></th><th>Areas /Activities</th></tr><tr><td>1</td><td>FFB transportation to the mill.</td><td>10</td><td>FFB transportation within estate</td></tr><tr><td>2</td><td>Movement of vehicles/machines</td><td>11</td><td>Fertilizer application</td></tr><tr><td>3</td><td>Herbicide/pesticides spraying</td><td>12</td><td>Roadside spraying</td></tr><tr><td>4</td><td>Anti-malaria fogging</td><td>13</td><td>Workshop</td></tr><tr><td>5</td><td>Road resurfacing &amp; grading</td><td>14</td><td>Engine room operations</td></tr><tr><td>6</td><td>Grass cutting /construction</td><td>15</td><td>Dispensary</td></tr><tr><td>7</td><td>Harvesting, pest and disease,</td><td>16</td><td>Soil mounding</td></tr><tr><td>8</td><td>Nursery</td><td>17</td><td>Replanting</td></tr><tr><td>9</td><td>Water treatment Plant</td><td>18</td><td>Rubbish disposal</td></tr></table> <p>Similarly, the environmental aspects for the mill are tabulated in the EAI master list (<i>EAI/MOM/2013/001—1ME to EAI/2015/MOM/020</i>). Among others the EAI's are divided into the all stations in the mill processing as listed below. The newest added activities being the dewatering project.</p> <ul style="list-style-type: none"><li>a) the boiler stack emission, black smoke</li><li>b) palm oil mill effluent (POME) discharge and water contamination,</li><li>c) Activities related to managing of scheduled wastes and general waste.</li><li>d) Activities of all operations beginning from the mill entrance ending to the effluent, EFB operations.</li></ul>		Areas/Activities		Areas /Activities	1	FFB transportation to the mill.	10	FFB transportation within estate	2	Movement of vehicles/machines	11	Fertilizer application	3	Herbicide/pesticides spraying	12	Roadside spraying	4	Anti-malaria fogging	13	Workshop	5	Road resurfacing & grading	14	Engine room operations	6	Grass cutting /construction	15	Dispensary	7	Harvesting, pest and disease,	16	Soil mounding	8	Nursery	17	Replanting	9	Water treatment Plant	18	Rubbish disposal
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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	YES		The plans and impact assessments relating to environmental impacts based on documents for both estates and the mill are elaborated in the following records. The main purpose of for this assessment was to evaluate and analyze impact on soil, water, and lair associated with the organization activities. Among environment aspects																																								

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	<p>affected stakeholders.</p> <p><u>AUDITORS' GUIDE:</u>  1) To ensure adequate stakeholder involvement", auditors can look for evidence that the CH considers internal/external input i.e. union minutes, JCC meetings, workers complaint log book and any other sources apart from stakeholder meeting as the sources of stakeholders input and to demonstrate their involvement.  2) To ensure that replanting activities and workers involved sampled.  3) To ensure available positive impacts were identified, included and promoted into the SEIA by the CH.  4) To ensure negative impacts were identified and mitigated appropriately.  5) Mechanism to monitor the plans established shall be evident.</p>		<p>assessed were agrochemical applications, land and water contamination from hazardous material and farm vehicles, human settlement disturbance and abandonment areas</p> <ul style="list-style-type: none"> <li>a) Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, (version 1; year 2008 Issue no. 1; dated 1 April 2009 Register)</li> <li>b) Appendix 5.4.1c - Environmental Aspect and Impact Identification form (version 1; year 2008 Issue no. 1; dated 1 April 2009; MR-01/EAI)</li> <li>c) Appendix 5.4.1d – Environmental Impacts Evaluation form (version 1; year 2008 issue no. 1; dated 1 April 2009; MR-02/EIE)</li> </ul> <p>Similarly, the environmental aspects for the mill are tabulated in the EAI master list (EAI/MOM/2013/001—1ME to EAI/2015/MOM/020). Among others the EAI's are divided into the all stations in the mill processing as listed below. The newest added activities being the dewatering project.</p> <ul style="list-style-type: none"> <li>e) the boiler stack emission, black smoke</li> <li>f) palm oil mill effluent (POME) discharge and water contamination,</li> <li>g) Activities related to managing of scheduled wastes and general waste.</li> <li>h) Activities of all operations beginning from the mill entrance ending to the effluent, EFB operations.</li> </ul> <p>The documents were maintained, sighted and verified.</p> <p>Social action plan updated annually at all supply bases. It was based on the complaints and grievances and also based on the stakeholder conducted at each operating units.</p>
	<p>3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p><u>AUDITORS' GUIDE:</u>  1) Please check any changes that may trigger the renewal of the SEIA assessment i.e. change of stakeholders composition, current situation and condition in comparison with the baseline year.</p>	NO	<p>There is no change of current practices required to mitigate negative effects based on identified impacts for both the mill and estates. However, the mill and estates have conducted periodical review on the aspects and impacts identified and evaluated as registered. The mill and estates have continuously implemented their annual programs that were established as part of its individual Pollution Prevention Plan. Managers and assistant managers of mill and estates were identified as person-in charge of the Programs which were established upon review of the aspect and impact register. It was observed that the reviewing and updating on the registers were done annually if there's no any new activity within respective sites.</p> <p>Giram mill use the <i>Environmental Aspect and Impact Identification Form &amp; Environmental Impact Evaluation Form</i> to identify the potential aspect &amp; impact for further necessary action. The record was reviewed on January 2020 by the Mill Engineers and approved by the Mill Manager. There were no changes made to the records. The Waste Management Plan FY 2020 comprising of Pollution Prevention Plan</p>

Clause	Indicators	Comply Yes/No	Findings															
			<p>2020 has been established on revision made beginning Jan 2020. Among others the pollution prevention identified are;</p> <p>a) The control of black smoke emissions,</p> <p>b) monitoring water course,</p> <p>c) Scheduled Waste and effluent discharge monitoring.</p> <p>All the estates had established the <i>Pollution Prevention Plan 2020</i> among others addressing the following environmental issues;</p> <table><tr><th></th><th>Issues</th><th>Mitigation measures</th></tr><tr><td>1</td><td>Leakage of pesticide during chemical mixing</td><td>to recollect water used at chemical mixing area to be recycled during mixing to construct oil trap at chemical mixing area to contain leakages</td></tr><tr><td>2</td><td>Contaminated ground / soil at workshop area</td><td>to replace tray whenever tractors / machines under repairing progress to avoid oil spillage on the ground periodic checking on oil sump to ensure it is well maintained and to avoid any leakages</td></tr><tr><td>3</td><td>Prohibited spraying at line site</td><td>education to workers not to spray at the line site and explain reason for such a directive. periodic checking at the line site</td></tr><tr><td>4</td><td>Prohibited spraying &amp; fertilizer or chemical near the river (buffer zone)</td><td>provide training and create awareness to workers identifying and marking the buffer zones</td></tr></table> <p>The SIA has been carried out for SOU 29 Giram and a report dated September 2013 was produced and sighted during the audit. The SIA consultations for Giram Estate, Giram Palm Oil Mill and Mostyn Estate were carried out on 28/08/2013, 27/08/2013, and 29/08/2013, respectively. Records of all consultation meetings were documented and sighted. Based on the SIA report and the stakeholder consultations/meetings attendance records available, there is evidence that the SIA was carried out with the participation of the affected parties. The stakeholder consultations/meetings were attended by the local communities, mandores, workers (harvesters, loaders, drivers, loose fruit collectors, watchmen, manurers, spayers, and security personnel).</p> <p>Social action plan updated annually at all supply bases. However, social management and monitoring plans have not implemented, reviewed and updated in a participatory way. For Mostyn Estate, The SIA management and monitoring plans have not implemented and reviewed in a participatory way to update the issue:</p> <ul style="list-style-type: none"><li>- Kg Simpang Ampat: issues regarding Land Survey at Lur Malung Land</li><li>- Kg Seri Bahagia: issues regarding Village main road.</li></ul>		Issues	Mitigation measures	1	Leakage of pesticide during chemical mixing	to recollect water used at chemical mixing area to be recycled during mixing to construct oil trap at chemical mixing area to contain leakages	2	Contaminated ground / soil at workshop area	to replace tray whenever tractors / machines under repairing progress to avoid oil spillage on the ground periodic checking on oil sump to ensure it is well maintained and to avoid any leakages	3	Prohibited spraying at line site	education to workers not to spray at the line site and explain reason for such a directive. periodic checking at the line site	4	Prohibited spraying & fertilizer or chemical near the river (buffer zone)	provide training and create awareness to workers identifying and marking the buffer zones
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			<ul style="list-style-type: none"> <li>- Kg Mostyn Lama : issues regarding request of water from KGTI to villagers which is villagers willing to pay</li> </ul> <p>The SIA also did not updated issues:</p> <ul style="list-style-type: none"> <li>- Kg Selamat: regarding Land Title</li> </ul> <p>Based on SIA action plan at GIRAM Mill and GIRAM Estate, the issues of stray dogs was not updated in participatory way. Therefore, MAJOR NCR raised as MZK 01/MAR 01 2020.</p>
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 documented and made available to the workers and their representatives.	YES	<p>Employment procedures for recruitment, selection, hiring, are documented. For locals, the procedures are in SOP on Hiring of Local workers, known as Doc No 01-11-19. The procedure details out the process of hiring (application form, screening, interview, requisition approval from Regional GM, medical check-up and issuance of letter of offer). This procedure was confirmed by a newly-recruited worker at the Mill and verified through the worker's personal file as indicator 6.2.1 and 6.2.2. For foreign worker, the employment procedures are contained in Standard Operating Process &amp; Procedures (SOPP) Doc No. WMU/WMC-SOPP/JAN2016/R1 dated 1 Nov 2016.</p> <p>Employment procedures for retirement and termination are available in the local workers' employment contracts. Similarly, foreign workers' contracts also contain provision for mutual termination. Retirement procedure is not applicable to foreign workers. Promotion procedures are also stated in the procedure, but they are subject to annual performance indicator.</p>
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	<p>Employment procedures are contained in Doc No 01-11-19 (hiring of local workers) and SOPP Doc No. WMU/WMC-SOPP/JAN2016/R1 (hiring of foreign workers) dated 1 Nov 2016. Evidence of implementation is available from workers' files such as application form, interview, medical test and issuance of letter of offer.</p>
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	YES	<p>Both the mill/estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following;</p> <ul style="list-style-type: none"> <li><b>a) Change in work process</b></li> <li><b>b) Revision/changes in legislative requirement</b></li> <li><b>c) Occurrence of accidents</b></li> </ul> <p>Giram Estate Latest review of HIRARRC has been conducted on 07/01/2020 related to accident occur for patrolling operation.</p> <p>Mostyn Estate Latest review HIRARC has been carried out on 05/02/2020 related to accident occur at harvesting operation.</p>

Clause	Indicators	Comply Yes/No	Findings
			Giram POM Latest review HIRARC has been carried out on December 2020 related to accident occur at workshop area.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	<p>The effectiveness of implementation health &amp; 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 on monthly basis. Sighted evidence of workplace inspection has been carried out for the mill and 2 estates, at reception area, fruit handling, sterilizer, thresher, clarification, pressing, deprecaper, boiler, power generation, water treatment plan, effluent treatment plan, kernel recovery, estate operation, etc.</p> <p>The Group Occupational Safety &amp; Health Management Policy had been established and implemented. The policy was signed by the Managing Director of Sime Darby Plantation dated January 2015 and displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the Regional SQM Executives and monitored by SQM Department at Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees &amp; contractors &amp; visitors. In interviews with the workers and staff during the site visit workshop, office compound, workshop, laboratory, engine room, boiler house) revealed that the employees had been briefed and had understood the policy. The plan also covered OHS objectives which included the following:</p> <ul style="list-style-type: none"> <li>a) zero accident case in major accident (class I and class II).</li> <li>b) to achieve &gt; 500,000-man hours without LTI</li> <li>c) to enhance OSH awareness through comprehensive ESH Training (target 70%).</li> <li>d) to extent the awareness of safety from operation area to Housing Complex.</li> </ul>
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.	NO	<p>Formal training programmes for 2020 covered all aspects of the RSPO Principles and Criteria. Regular assessments of training needs were presented to auditors by the Giram POM and all estates visited. Year 2020 Training Plan was established in Jan 2020. A training needs identification matrix has been established with target dates for the training to be conducted. The training program includes</p> <ul style="list-style-type: none"> <li>• ESH Legal &amp; Other requirements</li> <li>• Safe handling of Electrical Equipment</li> <li>• Use &amp; Standard Exposure of Chemical Hazardous to Health (USECHH) 2000</li> <li>• Accident Investigation Techniques</li> <li>• Emergency Respond Plan Training (e.g. Chemical spill, poisoning, Fire Lightening)</li> <li>• First Aid Training</li> </ul>

Clause	Indicators	Comply Yes/No	Findings																																													
			<ul style="list-style-type: none"><li>Scheduled waste management</li><li>Safe Work Procedure for All Stations.</li><li>Confined Space Training</li><li>Policy Training</li><li>upkeep /maintenance / general work</li><li>IPM training &amp; HCV briefing</li><li>social training</li><li>awareness and competency training such as harvesting, manuring, IPM, chemical spraying, etc.</li></ul> <p>However, there were no evidence assessments of training was conducted at GIRAM Mill and GIRAM Estate. Based on training sampled dated 18/8/2020 at GIRAM Mill, 7/8/2020, 10/2/2020 at GIRAM Estate and 13/3/2020 at Mostyn Estate, it was found that no assessment of training was conducted to the employee, in a form they understand. Therefore, MAJOR NCR raised as MAR 02 2020.</p>																																													
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	<p>Records of Training 2019/2020 has established and available at each CU. Among of training has been conducted such as:</p> <p>GiramEstate</p> <table><tr><th>No</th><th>Date</th><th>Subject</th></tr><tr><td>1</td><td>09/12/2019</td><td>Training for sprayer &amp; P&amp;D</td></tr><tr><td>2</td><td>22/10/2019</td><td>Training for replanting</td></tr><tr><td>3</td><td>08/03/2020</td><td>Training for sprayer</td></tr><tr><td>4</td><td>10/02/2020</td><td>HCV training</td></tr></table> <p>Giram POM</p> <table><tr><th>No</th><th>Date</th><th>Subject</th></tr><tr><td>1</td><td>07/02/2020</td><td>Environment, safety and health awareness training</td></tr><tr><td>2</td><td>10/02/2020</td><td>Safe electrical handling training</td></tr><tr><td>3</td><td>17/02/2020</td><td>LOTO Training</td></tr><tr><td>4</td><td>14/02/2020</td><td>RSPO principle awareness training</td></tr></table> <p>Mostyn Estate</p> <table><tr><th>No</th><th>Date</th><th>Subject</th></tr><tr><td>1</td><td>11/02/2020</td><td>RSPO MYNI training</td></tr><tr><td>2</td><td>13/03/2020</td><td>HCV awareness training</td></tr><tr><td>3</td><td>27/12/2019</td><td>First aid kit training</td></tr><tr><td>4</td><td>21/02/2020</td><td>Sustainability policy &amp; child protection training</td></tr></table>	No	Date	Subject	1	09/12/2019	Training for sprayer & P&D	2	22/10/2019	Training for replanting	3	08/03/2020	Training for sprayer	4	10/02/2020	HCV training	No	Date	Subject	1	07/02/2020	Environment, safety and health awareness training	2	10/02/2020	Safe electrical handling training	3	17/02/2020	LOTO Training	4	14/02/2020	RSPO principle awareness training	No	Date	Subject	1	11/02/2020	RSPO MYNI training	2	13/03/2020	HCV awareness training	3	27/12/2019	First aid kit training	4	21/02/2020	Sustainability policy & child protection training
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			5	20/07/20	Manuring training	
			6	28/02/20	Fire drill training	
			7	07/02/20	First aid kit training	
			8	27/07/20	Chemical spillage training	
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	YES	Appropriate training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been conducted on 14/2/20 attended by 6 person including PIC, Clerk, Assistant Engineer, Staff, Weighbridge Operator and Attendance list & photograph was seen.			

### **SUPPLY CHAIN REQUIREMENTS FOR MILLS**

**Disclaimer text:** 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
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	YES	Giram Palm Oil Mill (GPOM) sourced for their FFB only from estates under the same SOU which involve Giram Estate and Mostyn estate. But Giram Mill already downgraded the mill to Mass Balance in March 2020. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.  Not applicable since this mill is Mass Balance.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 <sup>rd</sup> party certified supply base.	YES	Giram POM received certified FFB from own Estate Which is Giram Estate and Mostyn estate. And Uncertified FFB from Surrounding Smallgrower and Small holder which is unspecified yet due to Mill only just downgraded in March 2020. Thus, Giram POM has qualifies for the Mass Balance chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products. Details as in Table 3 of this report
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification 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.	YES	This has been made available, as in Table 4 of this report.
3.8.4	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).	YES	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information were: Name: Giram Oil Mill - Sime Darby Country: Malaysia. Member ID: RSPO_PO1000000182 Member Category: Oil Mil Core product: Palm Oil Old dates Start date: 13-09-2019 End date: 12-07-2020 Copy of Shipping Announcement was provided during the audit as evident of compliance to reporting requirement as listed by the standard.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	<p>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:</p> <ul style="list-style-type: none"> <li>Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard.</li> <li>The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</li> </ul>	YES	<p>-Giram POM had revised their documented procedure title 'Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001', version 2, Issue 5 dated April 2019. The procedure described the following:</p> <p>Clause 4.0 ~ the responsibility of for the implementation of RSPO SCC i.e. head of operating unit  Clause 5.0 ~ Control of document &amp; records such as weighbridge tickets, consignment note , training record &amp; contracts. Record retention for 10 years. Define the critical control point (CCP) :estate – weighbridge, mill – weighbridge, admin office, ramp, CPO despatch area, CPO storage tank. Kernel silos.  Clause 6.0 ~ Delivery of FFB from the estate – relevant record involved, flowchart for crop diversion, list of mill and their supply chain model i.e. IP or MB  Clause 7.0 ~ Receiving FFB at the mill – list of supply base, rules for determining diverted FFB destination, relevant record  Clause 8.0 ~ Production of ISCC certified Waste/Residues – Follow SOP Separate Oil Recovery System  Clause 9.0 ~ process monitoring – for IP model mill need to ensure no mixing of RSPO certified and non-certified  Clause 10.0 ~ CPO and PK despatch – [Clause 9.1] all delivery of CPO and PK shall be in accordance with the contract allocated by Global Trading &amp; Marketing (GTM) department. [Clause 9.2] Outgoing document for CPO and PK 9e.g. contract, weighbridge ticket / despatch note) shall specify the following information which can be either presented in single document or across a range of document Trade name / RSPO IP, RSPO certificate no. : RSPO 0025,  Clause 11.0 ~ Non-conforming material / product – requirement to downgrade the RSPO Product  Clause 12.0 ~ product claim – shall follow RSPO rules on market communication &amp; claim  Clause 13.0 ~ Outsourced contractor - the mill has established list of outsourced contractor. Sighted list of transporter for CPO and PK.  Clause 14.0 ~ Training – the mill shall provide training for relevant personnel carrying the task at tech critical control point (CCP).  Clause 15.0 ~ Reclassification of mill's supply chain model - Reclassification of mill's supply chain model may be determined by GTM/ PSQM. CB shall be notified. All communicated shall be recorded.  Clause 16.0 ~ Production volume  Clause 17.0 ~ Conversion Factors  Clause 18.0 ~ Internal Audit  Clause 19.0 ~ Complaints</p>

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p><b>AUDITORS' GUIDE:</b></p> <ul style="list-style-type: none"> <li>Visit the workplace and interview relevant personnel to ensure that the handling of certified palm products is under control of the organization, in accordance with the established procedures e.g. the weighbridge system, packaging, receiving, loading and storage facility area.</li> <li>Availability of an approved annual training plan; and</li> <li>Training record addressing the RSPO SCCS requirement i.e. attendance list).</li> <li>Request the list of personnel involved in managing the RSPO SC system in the company.</li> <li>Check the training identified for the personnel and interview to verify the effectiveness of the training.</li> <li>Request for the training materials and check on the training effectiveness.</li> <li>Procedure shall also cover complaints from customers and stakeholders.</li> </ul>		<p>Clause 20.0 ~ Management Review</p> <p>-The procedure was kept in file RSPO Supply Chain Manual (SCM/RSPO/SD) Appropriate changes were also made in the change to include the new clause Production of ISCC certified waste/residues materials at the mill. Appropriate training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been conducted on 14/2/2020 attended by 14 persons including PIC, Clerk, Assistant Engineer, Staff, Weighbridge Operator and Attendance list &amp; photograph was seen.</p> <p>- The Assistant Engineer (Sahrulanwar bin Mansor) has the overall responsibility and authority over the implementation of RSPO supply chain requirement in RSPO Giram POM. Interview with sustainability committee member, mill manager, assistant mill manager &amp; weighbridge operator confirmed that they understood the supply chain requirements.</p> <p>- GPOM had continued to implement the procedures it had on receiving and processing of RSPO certified and non- certified FFBs. (Refer para. 7.0 of the SOP - Receiving FFB at the Mill) it has described how GPOM manages the FFB from certified source. No issue regarding receiving Non-certified FFB as this mill is a MB Mill.</p>
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> </ul>	YES	<p>As describe under para 18.0 SOP for sustainable Supply Chain and Traceability issue no 5 dated April 2019, MPOM refer to Internal Audit Procedure (SD/SDP/PSQM/IAP) dated 1/11/17 which is follow the RSPO Supply Chain Certification Standard Revision 2017 requirements.</p> <p>Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2017 requirements.</p> <p>RSPO internal audit was conducted on 14 February 2020 by Eza Nurain Abdullah (lead auditor), Vinondran Ramachandran. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications</p>

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> <li>Effectively implements and maintains the standard requirements within its organisation.</li> <li>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.</li> </ul>		<p>and Claims Documents. There are 1 Observation were raised by auditor. Minor NCR has been answered, and the auditor found that all of the corrective actions were successfully addressed by the POM. Audit Attendance sheet, audit plan, audit notes, were sighted by auditor.</p> <p>- Documented procedure has defined management review will be conducted once a year Management review meeting has been conducted on dated 19/2/20 (combine RSPO, RSPO SCCS and MSPO)</p> <ul style="list-style-type: none"> <li>Internal audit – 1 Observation (SCCS only)</li> <li>Customer feedback – data analysis show result from customer survey 22 Complaints on PK (stone) and</li> <li>Previous meeting – was highlighted</li> <li>Changes – There is no significant changes.</li> <li>Recommendation for improvement – improve the established system</li> </ul>

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p> <p><b>AUDITORS' GUIDE:</b></p> <ul style="list-style-type: none"> <li>• Obtain list of all suppliers and list of purchase orders/invoices/ documentation issued between the mill and the suppliers.</li> <li>• Check for agreement/contracts signed with suppliers (if necessary).</li> <li>• Sampling of purchase orders/invoices shall be done on a random basis and the minimum number of samples selected shall be based on the square root formula for each suppliers.</li> <li>• Ensure the purchase orders/invoices have the correct supplier's information</li> </ul>	YES	<p>GPOM had continued to receive certified FFB from own Estate Which is Giram Estate, and Mostyn Estate. And Uncertified FFB from Surrounding Smallgrower and Small holder which is 3 suppliers namely Ldg KOP Giram, PA Tech Sdn Bhd, Wah Len Enterprise Sdn Bhd. The validity of the certificate of the supplier has been checked accordingly. Sighted sample FFB consignment note for Giram Estate, and Mostyn Estate and 3 Outsider Supplier for the month of January 2020 – July 2020. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Monitoring records titled as “<i>RSPO &amp; MSPO Mass Balancing Records for Oil Mills</i>” has recorded the tonnage of certified FFB and its supplying estate.</p> <p>There is no over production sighted as the mill apply for extension volume on approve on 11/8/20 by RSPO.</p>

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ol style="list-style-type: none"> <li>The name and address of buyer;</li> <li>The name and address of the seller</li> <li>The leading or shipment/delivery date;</li> <li>The date on which the documents were issued;</li> <li>RSPO certificate number;</li> <li>A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations);</li> <li>The quantity of the products delivered;</li> <li>Any related transport documentation</li> <li>A unique identification number</li> </ol>	YES	<p>The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Sime Darby Plantations Berhad and Global Trade Marketing Department (HQ) on behalf of Giram POM.</p> <p>Sample of deliveries document were sighted during the audit and it was found all related information were adequate. Giram POM's RSPO certificate number and product name together with model used were stated in the delivery documents.</p> <p><b>CPO</b>  Purchase Order No. 13557 and weight bridge ticket No. 013858 dated 30/7/2020 issued by GPOM to Kunak Bulking Installation, Quantity delivered is 38.19 mt . were sighted and found to be in good order. These documents have clearly stated the product name and model of the supply chain system [CSPO MB].  Purchase Order No. 13550 and weight bridge ticket No. 013851 dated 29/7/2020 issued by GPOM to Kunak Bulking Installation, Quantity delivered is 39.77 mt . were sighted and found to be in good order. These documents have clearly stated the product name and model of the supply chain system [CPO MB].</p> <p><b>PK</b>  Delivery Order No. 13231 and weight bridge ticket No. 013532 dated 17/4/2020 issued by GPOM to LDEO, Quantity delivered was 25.28 mt. were sighted and found to be in good order. These documents have clearly stated the product name and model of the supply chain system [PK MB].  Delivery Order No. 13557 and weight bridge ticket No. 013858 dated 30/7/2020 issued by GPOM to LDEO, Quantity delivered was 38.19mt . were sighted and found to be in good order. These documents have clearly stated the product name and model of the supply chain system [PK MB].</p>

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill 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 mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	YES	<p>There are 1 outsource company CPO transporter i.e. Pengangkutan Bumi Sdn Bhd (agreement sign on 19/12/2017). The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. There is a clause regarding Supply chain in the 'annexure 5' of agreement. Record of training dated 15/5/2020 for transporter contractor was sighted by the auditor.</p> <p>a) 1 outsource company CPO transporter i.e. Pengangkutan Bumi Sdn Bhd (agreement sign on 19/12/2017)</p> <p>b) There is contract document between Giram POM and the transporters. But there is another attachment (Annexure 5) stated that the contractor agrees that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary on date 13/5/20.</p> <p>c) The RSPO Supply Chain procedure has described on Para 13.0 Outsource Contractor and briefed to the contractor on date 13/5/20.</p> <p>d) There is contract document between Giram POM and the transporters. But there is another attachment (Annexure 5) stated that the contractor agrees that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary on date 19/3/20.</p>

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<b>AUDITORS' GUIDE:</b> <i>Check the signed agreement has included a provision as required in para (d) of this requirement.</i>		
3.8.10	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 contact person for both transporters were made available and up-to-date in the stakeholder list. And was updated on 3/1/20.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	YES	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	YES	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up-to-date.
	ii) 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	Relevant record was maintained for more than 10 years as per Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001', version 2, Issue 5 dated April 2019
	iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	YES	Giram POM has maintained the Real Time basis accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record titled as "RSPO & MSPO Mass Balancing Record for Oil Mills".
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO	YES	From May 2019 to July 2020, Giram POM had delivered 3,529.470MT of CPO MB to 4 buyer (Lahad Datu Edible Oil, Kunak Bulking Installation, TSH-Wilmar Sdn Bhd and Mewah Datu Sdn Bhd) From same date 13,051.000 MT of PK IP/MB to 4 buyer (Lahad Datu edible oil, Kunak Bulking Installation, TSH-Wilmar Sdn Bhd and Cacao Paramount Sdn Bhd). The records of of the volume purchased (input) and claimed (output) over a period of 12 months was updated in 'RSPO&MSPO Mass Balancing Records for Oil Mill'.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings												
	<p>and PK on a real-time basis and / or three-monthly basis.</p> <p>b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)</p>														
3.8.13	<p>Extraction rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	YES	<p>Giram POM process all the received certified crop &amp; their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER).</p> <table><tr><th>Items/ Month</th><th>Month (Actual) (%)</th><th>Year-to-date (%)</th></tr><tr><td>June 2020</td><td>OER 21.40 KER 5.19</td><td>OER 22.19 KER 5.17</td></tr><tr><td>July 2020</td><td>OER 22.17 KER 4.68</td><td>OER 22.18 KER 5.19</td></tr><tr><td>August 2020</td><td>OER 23.41 KER 4.88</td><td>OER 22.30 KER 5.16</td></tr></table> <p>These figures were monitored on daily &amp; monthly basis by the mill using the prepared template (e.g. Monthly Production Report – Physical Movement) to ensure their accuracy as well as monitoring of their ongoing performance.</p>	Items/ Month	Month (Actual) (%)	Year-to-date (%)	June 2020	OER 21.40 KER 5.19	OER 22.19 KER 5.17	July 2020	OER 22.17 KER 4.68	OER 22.18 KER 5.19	August 2020	OER 23.41 KER 4.88	OER 22.30 KER 5.16
Items/ Month	Month (Actual) (%)	Year-to-date (%)													
June 2020	OER 21.40 KER 5.19	OER 22.19 KER 5.17													
July 2020	OER 22.17 KER 4.68	OER 22.18 KER 5.19													
August 2020	OER 23.41 KER 4.88	OER 22.30 KER 5.16													
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	YES	<p>Extraction rates has been updated monthly as per stated in Monthly Production Report (Physical Movement)</p>												

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.15	Processing For Identity Preserved Module, the mill 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 products, including during transport and storage to strive for 100% separation.	YES	Not Applicable since this mill is MB Mill
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform	YES	Documented procedures related to sales and goods out were sighted and found adequate. The requirement of sales & goods out especially on notation of applicable Supply Chain model & Certificate number is being complied with as it was indicated in the weighbridge dispatch ticket.  The registration of transaction is being carried out by Group Plantation Marketing subordinate using the RSPO Member ID of RSPO_PO1000000182  Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).  Following sample of shipping announcement had been verified during the audit;  Transaction ID TR-bd27a0f2-b482 created on 30/4/2020 for delivery of 274.25mt of Certified Sustainable Palm Oil (CSPK).  Transaction ID TR-d194b9db-4aec created on 5/8/2020 for delivery of 347.48mt of Certified Sustainable Palm Oil (CSPK).
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	YES	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Giram POM has not use RSPO corporate logo as well as trademark logo.

#### **Principle 4: Respect community and human rights and deliver benefits**

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 Cert. 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 (HRD), is documented and communicated 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, including contracted security forces.	YES	<b>Remote</b> The policy to respect human rights was documented in the Sime Darby Plantation's Human Right Charter Policy. This Policy states among others, that it will develop its businesses with a sense of humanity, ensuring that they are socially beneficial and do not infringe basic human rights. This policy was communicated to the workers during muster briefings. Communication of this Policy was given at Giram Palm Oil Mill on 1 February 2020, 3 June 2020 (at Giram Estate) and on 13 Jan 2020 (Mostyn Estate). The policy on Human Rights Defenders dated 25 March 2020 also available. However, it needs further verification during onsite audit. <b>Onsite</b> Policy to respect human rights is available and documented in the Sime Darby Plantations Human Rights Charter. The Policy was communicated to stakeholders which included FFB suppliers during stakeholder meeting on 7 January 2020. The Group has established a specific Policy on Human Right Defenders, Whistleblowers and Complainants and the the Policy had been finalised by GSQM on 25 March 2020.
	<b>AUDITORS' GUIDE:</b> 1) There must be a policy statement and the communication shall be evident. Interview shall be carried out to confirm understanding and awareness.		
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	
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 and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	YES	The system used by the SOU 29 Giram in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Procedures for handling Social Issues" dated 1 Nov 2010. The Mill and Estates within SOU 29 each have its own Internal Complaint Book and External Communication Book. The Internal Complaint Book was used for employees to lodge complaint pertaining to their houses, and there is evidence that the complaints were resolved in a timely and appropriate manner. The external book was reviewed and found no complaints against the CU. Anonymity of complainants and whistleblowers are ensured under the Sime Darby Code of Business Conduct which provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ. Auditor has received copy of The Group Policies & Authorities (GPA) No. B5 WHISTLEBLOWING POLICY dated 29 AUGUST 2019. At section 4.3 (g) self explanatory that "For the purposes of this policy, the following improprieties are referred to as 'Wrongdoing' whether committed within the Group or in connection with the Group's business: Breaches of any Group policies and/or COBC which also refer to the Policy on

Clause	Indicators	Comply Yes/No	Findings
			the Protection of Human Rights Defenders (HRDs).
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	The documented system in dealing with complaints and grievances are briefed during muster briefing. At the Giram Palm Oil Mill, this briefing was given on 30 December 2019, and at Giram Estate on 3 June 2019 and 24 Jan 2020. To ensure that illiterate parties also understand the procedures, verbal briefings are given and translated into the language the affected parties understand. This was confirmed by foreign workers interviewed at the estates and mill.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	YES	There is evidence that parties to a grievance are kept informed of the progress of the complaints. Actions taken following complaints on house defects were informed to the complainants and the repair update was acknowledged by the complainant on the same date.
	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	Paragraph 7 of Appendix 5 Sustainable Plantation Management System, Flowchart and Procedure On Handling Social Issues Version 1, Year 2008, Issue No 1, Date 1 Nov 2008 states upon failure of negotiation process involving estate management, representatives from the disputed parties, zone heads, third parties and stakeholders, legal proceedings may follow. Paragraph 8 of Appendix 3 of the same document on procedures Handling Land Disputes states that "further negotiation processes may involve independent third parties such as representatives from the Land Office or from other NGOs." Therefore, the conflict resolution mechanism includes options to access independent legal and technical advice.
4.3 The unit of certification contributes to local sustainable development 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.	NO	There is evidence that contributions to community development was provided based on consultations. There is a donation to the surrounding schools, Mosque and Government agencies. The most important thing is 80% of the staff and non clerical staff are from surrounding villagers which is the main Contributions to community development. However it was found that at Mostyn Estate, there are records of CSR to the school and government agencies, however, during interviewed with local communities surrounding the Estate from Kg Sri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Mostyn Lama and Kg Selamat there are no explanations to them regarding contributions to community development. Thus, Minor NCR MZK 04 2020 has been raised.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land	YES	The legal ownership and the maps to indicate the boundary stone were sighted at Giram Estate and Mostyn Estate. The Land Title for both Estate has been verified. The Land Title are originated from 11 Smallholder and Sell to Company Name Harrison's Malaysian Plantations Sdn Bhd in year 1984-1992. Auditor has verified the record of Transfer from smallholder to Harrison's. Harrison's Malaysian Plantations Sdn Bhd sold the land to Golden Hope plantations in 1991 and after that, merged with Sime Darby in 2008. Both

Clause	Indicators	Comply Yes/No	Findings																																																																																																																																																				
without their free, prior and informed consent.	tenure and/or the actual legal or customary use of the land are available.		<p>estates are still in progress to get the ownership of these land titles as verified through official letter from the Lands and Surveys Department of Sabah dated 17/06/2015 (PPHT/KNK:200-3/1/KLT.15(31)). As of to date, some land title has been approved to change under the name of Sime Darby Plantation (Sabah) Sdn Bhd and some still pending to change the name, due to cost restriction.</p> <table><tr><th></th><th>Land title</th><th>Ha</th><th>Status</th><th>Type of plantation</th><th>Period</th></tr><tr><td rowspan="10">Giram Estate</td><td>CL 245179042</td><td>2285.979</td><td>Lease</td><td>Agriculture</td><td>21 May 2061</td></tr><tr><td>CL 245270400</td><td>9.823</td><td>Lease</td><td>Agriculture</td><td>21 May 2061</td></tr><tr><td>CL 105369551</td><td>268.59</td><td>Lease</td><td>Agriculture</td><td>31 Dec 2077</td></tr><tr><td>CL 105369560</td><td>60.95</td><td>Lease</td><td>Agriculture</td><td>31 Dec 2077</td></tr><tr><td>CL 105369579</td><td>364.50</td><td>Lease</td><td>Agriculture</td><td>31 Dec 2077</td></tr><tr><td>CL 105369588</td><td>283.726</td><td>Lease</td><td>Agriculture</td><td>31 Dec 2077</td></tr><tr><td>CL 105369597</td><td>40.63</td><td>Lease</td><td>Agriculture</td><td>31 Dec 2077</td></tr><tr><td>CL 105369604</td><td>202.30</td><td>Lease</td><td>Agriculture</td><td>31 Dec 2077</td></tr><tr><td>CL 105361322</td><td>243.42</td><td>Lease</td><td>Agriculture</td><td>31 Dec 2077</td></tr><tr><td>CL 105390743</td><td>80.779</td><td>Lease</td><td>Agriculture</td><td>31 Dec 2077</td></tr><tr><td rowspan="16">Mostyn Estate</td><td>CL 105366569</td><td>323.95</td><td>Lease</td><td>Agriculture</td><td>31 Dec 2077</td></tr><tr><td>LA 80114709</td><td>3.768</td><td>Lease</td><td>Agriculture</td><td>31 Dec 2077</td></tr><tr><td>CL 245290788</td><td>247.72</td><td>Lease</td><td>Agriculture</td><td>17 Sept 1962</td></tr><tr><td>CL 245290797</td><td>171.79</td><td>Lease</td><td>Agriculture</td><td>17 Sept 1962</td></tr><tr><td>CL 245315271 (CL 115315270)</td><td>27.48</td><td>Lease</td><td>Agriculture</td><td>06 June 1939</td></tr><tr><td>CL 245315404</td><td>19.81</td><td>Lease</td><td>Agriculture</td><td>01 Jan 1965</td></tr><tr><td>CL 245331355 (CL 115331354) / (245315397 / 245335355)</td><td>2,142.90</td><td>Lease</td><td>Agriculture</td><td>14 Aug 1939</td></tr><tr><td>CL 245331382 (CL 115331381)</td><td>62.02</td><td>Lease</td><td>Agriculture</td><td>17 Sept 1962</td></tr><tr><td>CL 245355113</td><td>9.48</td><td>Lease</td><td>Agriculture</td><td>01 Jan 1980</td></tr><tr><td>CL 245355122</td><td>10.07</td><td>Lease</td><td>Agriculture</td><td>01 Jan 1980</td></tr><tr><td>CL 245355131</td><td>9.77</td><td>Lease</td><td>Agriculture</td><td>01 Jan 1980</td></tr><tr><td>CL 245355140</td><td>9.64</td><td>Lease</td><td>Agriculture</td><td>01 Jan 1980</td></tr><tr><td>CL 245355855</td><td>494.20</td><td>Lease</td><td>Agriculture</td><td>25 June 1960</td></tr><tr><td>CL 245355882</td><td>0.77</td><td>Lease</td><td>Agriculture</td><td>25 June 1960</td></tr><tr><td>CL 246151431</td><td>37.33</td><td>Lease</td><td>Agriculture</td><td>07 Feb 1941</td></tr><tr><td>PL 246179304</td><td>50.18</td><td>Lease</td><td>Agriculture</td><td>21 Apr 1959</td></tr><tr><td>PL 26151440</td><td>9.61</td><td>Lease</td><td>Agriculture</td><td>07 Feb 1941</td></tr><tr><td>CL 245334598</td><td>250.58</td><td>Lease</td><td>Agriculture</td><td>01 Jan 1980</td></tr></table>		Land title	Ha	Status	Type of plantation	Period	Giram Estate	CL 245179042	2285.979	Lease	Agriculture	21 May 2061	CL 245270400	9.823	Lease	Agriculture	21 May 2061	CL 105369551	268.59	Lease	Agriculture	31 Dec 2077	CL 105369560	60.95	Lease	Agriculture	31 Dec 2077	CL 105369579	364.50	Lease	Agriculture	31 Dec 2077	CL 105369588	283.726	Lease	Agriculture	31 Dec 2077	CL 105369597	40.63	Lease	Agriculture	31 Dec 2077	CL 105369604	202.30	Lease	Agriculture	31 Dec 2077	CL 105361322	243.42	Lease	Agriculture	31 Dec 2077	CL 105390743	80.779	Lease	Agriculture	31 Dec 2077	Mostyn Estate	CL 105366569	323.95	Lease	Agriculture	31 Dec 2077	LA 80114709	3.768	Lease	Agriculture	31 Dec 2077	CL 245290788	247.72	Lease	Agriculture	17 Sept 1962	CL 245290797	171.79	Lease	Agriculture	17 Sept 1962	CL 245315271 (CL 115315270)	27.48	Lease	Agriculture	06 June 1939	CL 245315404	19.81	Lease	Agriculture	01 Jan 1965	CL 245331355 (CL 115331354) / (245315397 / 245335355)	2,142.90	Lease	Agriculture	14 Aug 1939	CL 245331382 (CL 115331381)	62.02	Lease	Agriculture	17 Sept 1962	CL 245355113	9.48	Lease	Agriculture	01 Jan 1980	CL 245355122	10.07	Lease	Agriculture	01 Jan 1980	CL 245355131	9.77	Lease	Agriculture	01 Jan 1980	CL 245355140	9.64	Lease	Agriculture	01 Jan 1980	CL 245355855	494.20	Lease	Agriculture	25 June 1960	CL 245355882	0.77	Lease	Agriculture	25 June 1960	CL 246151431	37.33	Lease	Agriculture	07 Feb 1941	PL 246179304	50.18	Lease	Agriculture	21 Apr 1959	PL 26151440	9.61	Lease	Agriculture	07 Feb 1941	CL 245334598	250.58	Lease	Agriculture	01 Jan 1980
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				CL 245334589	127.31	Lease	Agriculture	01 Jan 1980
				CL 245332487	497.38	Lease	Agriculture	01 Jan 1979
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	<p>As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by SOU Giram since 1984-1992. The audit team had confirmed that there were no land issues related to previous owners.</p> <p>The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Selamat, Kg Mostyn Lama, Kg Skim Cocos, Felcra Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram, hence the evidence required under this clause was not available.</p>					
	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 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.	YES						
	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						
	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						
	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	YES						

Clause	Indicators	Comply Yes/No	Findings
	affected parties (including neighboring communities where applicable, and relevant authorities).		clause was not available.
	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 Giram
	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 Giram.
	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 Giram.
4.5 No new plantings are established on local peoples' land where 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 representative institutions.	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	YES	Based on Social Impact Assessment (SIA) Report for SOU Giram and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Sime Darby SOU Giram since 1984-1992. The audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Selamat, Kg Mostyn Lama, Kg Skim Cocos, Felcra Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram.
	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	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Giram since 1984-1992. 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 neighbouring estate. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Selamat, Kg Mostyn Lama, Kg Skim Cocos, Felcra Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram, Hence the evidence required under this clause was not available.

Clause	Indicators	Comply Yes/No	Findings
	process of consultation and negotiation.		
	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 now legitimately owned by Sime Darby SOU Giram since 1984-1992. 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 neighbouring estate. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Selamat, Kg Mostyn Lama, Kg Skim Cocos, Felcra Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram, Hence the evidence required under this clause was not available.
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Giram since 1984-1992. 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 neighbouring estate. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Selamat, Kg Mostyn Lama, Kg Skim Cocos, Felcra Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram, Hence the evidence required under this clause was not available.
	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 now legitimately owned by Sime Darby SOU Giram since 1984-1992. 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 neighbouring estate. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Selamat, Kg Mostyn Lama, Kg Skim Cocos, Felcra Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram, Hence the evidence required under this clause was not available.
	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	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Giram since 1984-1992. 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

Clause	Indicators	Comply Yes/No	Findings
	new concession or land title to the operator.		villagers, local community and neighbouring estate. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Selamat, Kg Mostyn Lama, Kg Skim Cocos, Felcra Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram, Hence the evidence required under this clause was not available.
	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 were 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 loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	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 issued on 1/11/2008 (Version 1) 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.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and 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"/ Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at mill and visited estates.
	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 SOU Giram. The Fresh Fruit Bunches are supplied from SDPB owned estates which are certified to RSPO and surrounding Smallholder which is not bound to Sime Darby and the Smallholder can send their FFB to other mill.
	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 issue on process and no outcomes of any negotiated agreements, compensation and payments to any affected parties.

Clause	Indicators	Comply Yes/No	Findings
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	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 document issued on 1/11/2008 (Version 1) 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.
	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 on compensation (monetary or otherwise) with villagers, local community and neighbouring estate. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Selamat, Kg Mostyn Lama, Kg Skim Cocos, Felcra Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram, hence the evidence required under this clause was not available. As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Giram since 1984-1992. 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 neighbouring estate. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Selamat, Kg Mostyn Lama, Kg Skim Cocos, Felcra Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram, Hence the evidence required under this clause was not available.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Giram since 1984-1992. 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 neighbouring estate. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Selamat, Kg Mostyn Lama, Kg Skim Cocos, Felcra Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram, Hence the evidence required under this clause was not available.
4.8 The right to use the land is demonstrated and is not	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	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Giram since 1984-1992. 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 neighbouring estate.

Clause	Indicators	Comply Yes/No	Findings
legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	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.		The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Selamat, Kg Mostyn Lama, Kg Skim Cocos, Felcra Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram, Hence the evidence required under this clause was not available.
	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 acquired plantations, the unit of cert. addresses any unresolved conflict through appropriate conflict resolution mechs.	YES	Land conflict is not present in the area of the unit of certification. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Selamat, Kg Mostyn Lama, Kg Skim Cocos, Felcra Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram, hence the evidence required under this clause was not available.
	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. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Selamat, Kg Mostyn Lama, Kg Skim Cocos, Felcra Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram, hence the evidence required under this clause was not available.
	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. It has been further confirmed through interviewed relevant stakeholders such as the Head of Village/ Representative Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Selamat, Kg Mostyn Lama, Kg Skim Cocos, Felcra Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram.

**Principle 5: Support smallholder inclusion**

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 fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Yes	Giram POM has displayed the current prices paid for FFB at the mill's weighbridge counter. The FFB prices (OER) were displayed at the weighbridge were as follows: July 20: RM 22.43 (1% OER).
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Yes	There is evidence that SOU Giram regularly explains the FFB Pricing to Smallholders surrounding. Latest Training/briefing were conducted i.e. at Giram POM on 29/7/20. The stakeholder information briefing concerned to FFB qualities, FFB grading, calculation payment by MPOB, oil extraction rate (OER). The calculation method of pricing was made known and given to the Smallholders. Field days were organised monthly by the mill to all the small holders from the supplying list.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	In Giram POM Price for FFB adopted the MPOB Pricing. All prices are calculated by the MPOB and the mill take the price and follow what MPOB guided. Interview with Koperasi Felcra Ladang Koperasi Giram Kokos, Koperasi Penanam Sawit Mampan Daerah Kunak, PA Tech Sdn Bhd, Wah Len Enterprise Sdn Bhd, whom are sending FFB to Giram POM revealed that they are satisfied with the current price and they are of the opinion that Giram POM, Mill Price is quite fair compare to other outsider Mills.
	5.1.4 (C) Evidence is available that all parties, including women and independent 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.	Yes	There is no bound contract for FFB outside supplier sending crop to the Giram POM. The Suppliers are freely to choose the mill choice of theirs. Except contract for payment rate, Quality of crop, and how payment has been made and it was found that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts Interview with Koperasi Felcra Ladang Koperasi Giram Kokos, Koperasi Penanam Sawit Mampan Daerah Kunak, PA Tech Sdn Bhd, Wah Len Enterprise Sdn Bhd, they satisfied with the contract.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	Interviews were conducted with Koperasi Felcra Ladang Koperasi Giram Kokos, Koperasi Penanam Sawit Mampan Daerah Kunak, PA Tech Sdn Bhd, Wah Len Enterprise Sdn Bhd, a) Consultations with Outsider suppliers confirmed that they understood the salient points in the agreement, namely contract duration, rate of payment, their obligations under the contract, etc. b) They also confirmed that contract entered into are valid, fair and transparent as the terms of payment are being negotiated upon prior to signing.

Clause	Indicators	Comply Yes/No	Findings
			Contract with FFB suppliers were drafted in the English language, which is understood by the suppliers, as verified during interviews.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	All contractor confirmed that payments were received within a reasonable timeframe which is 7-10 days after submission of invoice. And receipts contain specifying price, weight, deductions and amount paid are given.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	Weighing Equipment in SOU Giram has been calibrated on a yearly basis using Teras integrasi Sdn Bhd last on Giram POM on 12/12/19, Mostyn Estate on 4/11/19, and Giram Estate on 7/2/20
	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 SOU Giram 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. Sighted that latest Stakeholder (Mesyuarat Kerjasama Dua Hala) meeting on 3/7/20 to promote on RSPO certification. However, currently the Growers and villagers were not in favor in the implementation due to high cost. Their only focus for MSPO first.
	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	<p>There is a document namely "Flowchart and Procedures on Handling Land Disputes", Flowchart and Procedure on Handling Social Issues</p> <ul style="list-style-type: none"> <li>a) Additionally, there is also the "Whistle Blowing Channel" and Human Rights charter which was revised on 2020).</li> <li>b) The Dispute and Resolution Procedure commences with the receipt of complaint from any party, its investigation, proposed solutions and acceptance of the solutions or otherwise. If the proposed solution was rejected, the dispute will be brought for third party arbitration.</li> <li>c) Grievance or dissatisfaction and request for services on the part of the smallholder can be conveyed through the "Borang Aduan (Complaints Form)"- and the "Borang Permohonan (Request Form)"</li> </ul> <p>Sime Darby Whistleblowing Policy ensures anonymity. The Policy contains the Whistle Blower Complaint Response where the complainant has the option of remaining anonymous by not revealing his/her identity.</p>
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	Yes	Sime Darby SOU Giram 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. Sighted that latest Stakeholder (Mesyuarat Kerjasama Dua Hala) meeting on 3/7/20 to consults with interested smallholders including women or other partners in their supply base to assess their needs for support to improve

Clause	Indicators	Comply Yes/No	Findings
sustainable palm oil value chains.	their interest in RSPO certification.		their livelihoods and to promote on RSPO certification. However, the Growers and villagers were not in favor in the implementation due to high cost. They had expressed their plan to focus on MSPO first.
	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 SOU Giram 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. Sighted that latest Stakeholder (Mesyuarat Kerjasama Dua Hala) meeting on 3/7/20 to consults with interested smallholders including women or other partners in their supply base to assess their needs for support to improve their livelihoods and to promote on RSPO certification. However, the Growers and villagers were not in favor in the implementation due to high cost. They had expressed their plan to focus on MSPO first.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	Sime Darby SOU Giram 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. Sighted that latest Stakeholder (Mesyuarat Kerjasama Dua Hala) meeting on 3/7/20 to consults with interested smallholders including women or other partners in their supply base to assess their needs for support to improve their livelihoods and to promote on RSPO certification. However, the Growers and villagers were not in favor in the implementation due to high cost. They had expressed their plan to focus on MSPO first.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Yes	Sime Darby SOU Giram 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. Sighted that latest Stakeholder (Mesyuarat Kerjasama Dua Hala) meeting on 3/7/20 to consults with interested smallholders including women or other partners in their supply base to assess their needs for support to improve their livelihoods and to promote on RSPO certification. However, the Growers and villagers were not in favor in the implementation due to high cost. They had expressed their plan to focus on MSPO first.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Yes	Currently Sime Darby SOU Giram has created a system to trace their stakeholder around their estates. But so far growers and smallholders in Sabah are willing to join the WAGS to get certification but for smallholder in Sarawak doesn't want to involve because of financial restriction. But Sime Darby SOU Giram do have a report and always publicly available in their website.

### **Principle 6: Respect workers' rights and conditions**

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 dated January 2015, which states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Social Policy was displayed on notice boards in both Bahasa Malaysia and English. Interviews conducted with workers confirmed the implementation of this Policy.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Based on documentation reviewed such as employment contracts and letters of offer, pay slips, allocation of housing at the linesite and audit interviews, there is no evidence that local and foreign workers, women and local communities have been discriminated against. Interviews conducted with workers (male, female, local and migrant) as well as local communities also confirmed that this is so. There is also no evidence of payment of recruitment fees by migrant workers. Sampled workers interviewed and document reviewed are as in indicator 6.2.1 and 6.2.2.
	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	<b>Remote</b> 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. Interview of candidates will be done by Manager and the Assistant Managers where an evaluation form is filled up to determine the suitability of the candidate. Indicator 3.5.1 was also referred, but further verification will be conducted during on site audit. <b>Onsite</b> 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. Interview of candidates will be done by Manager and the Assistant Managers where an evaluation form is filled up to determine the suitability of the candidate. These documents are contained in the workers' personal files. Sampled workers interviewed and document reviewed are as in indicator 6.2.1 and 6.2.2.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated.	YES	As of the date of the audit, it was confirmed by the worker during interview, there is no evidence that pregnancy testing was carried out in a discriminatory manner. Pregnancy test was done on the worker own free will. Based on the interview, if there any case of pregnancy, the female worker will assigned to do light general work.

Clause	Indicators	Comply Yes/No	Findings
	Alternative equivalent employment is offered for 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.	NO	<p>A gender committee is in place throughout all the production units within SOU 29 Giram. The gender committee comprise female employees of all levels, including wives of male employees. Among the activities carried out by the Gender Committee include training on sexual harassment, reproductive rights and opportunities to improve members' income. Sampled was a Gender Committee awareness briefing held on 6 January 2020 attended by all Gender Committee members of SOU 29 Giram. Among the topics covered were:</p> <ul style="list-style-type: none"> <li>- Rights of pregnant employees to be given alternative jobs, where appropriate,</li> <li>- No discrimination for getting pregnant;</li> <li>- Sprayers or workers who are breastfeeding will not be given jobs dealing with chemicals;</li> <li>- Medical consultation will be given by the estate Medical Assistant;</li> <li>- Domestic violence;</li> <li>- Sexual harassment; and</li> <li>- How to handle social issues, including how to lodge a complaint.</li> </ul> <p>Other activities carried out by the gender committee include activities to improve health and baking classes. The Gender Committee meeting discussed children education and health which are all issues of concern, as well as opportunities and improvements for women.</p> <p>However, the female employees were not aware on the opportunities and improvements for women. Based on interview held with 2 female employees at GIRAM Estate, none of them were aware on the gender committee and awareness on opportunities and improvements for women. Therefore, MAJOR NCR was raised as MAR 03 2020.</p>
	6.1.6 There is evidence of equal pay for the same work scope.	YES	<p><b>Remote</b> Equal opportunities policy contained within the Sime Darby Social Policy dated January 2015 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. There is also verification of Pay slip during Remote audit but auditor needs further verification during onsite audit.</p> <p><b>Onsite</b> Comparisons were made of sampled employment contracts and payslips of harvesters from India and harvesters from Indonesia. Evidence is available that sampled workers receive equal pay for equal work. Sampled workers interviewed and document reviewed are as in indicator 6.2.1 and 6.2.2.</p>

Clause	Indicators	Comply Yes/No	Findings																																																																																																																																								
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	<p>Documentation of pay are available in the form of monthly pay slips, and conditions of pay are contained in employment contracts and letters of employment offer. Copies of these documents are provided to the workers. Briefing on relevant provisions on the Sabah Labor Ordinance (e.g. hours of work, rest day) Minimum Wages Order, were also given to the workers. Sighted were employment contracts of the following workers and their pay slips:</p> <table> <tr> <th>No</th><th>Emp No</th><th>Mill/Estate/Nationality</th><th>Designation</th></tr> <tr><td>1</td><td>10974</td><td>Giram Mill /Indonesia</td><td>FFB Grader</td></tr> <tr><td>2</td><td>32019</td><td>Giram Mill /Indonesia</td><td>FFB Grader</td></tr> <tr><td>3</td><td>20197</td><td>Giram Mill /Indonesia</td><td>FFB Grader</td></tr> <tr><td>4</td><td>30291</td><td>Giram Mill / Local</td><td>Boilerman</td></tr> <tr><td>5</td><td>32567</td><td>Giram Mill / Local</td><td>Boilerman</td></tr> <tr><td>6</td><td>13985</td><td>Giram Mill / Local</td><td>Boilerman</td></tr> <tr><td>7</td><td>98024</td><td>Giram Mill / Local</td><td>Water trtmt operator</td></tr> <tr><td>8</td><td>M2094</td><td>Giram Mill / Local</td><td>Foreman</td></tr> <tr><td>9</td><td>G3047</td><td>Giram Mill / Local</td><td>Wshop att</td></tr> <tr><td>10</td><td>20193</td><td>Giram Mill / Local</td><td>Wshop att</td></tr> <tr><td>11</td><td>40294</td><td>Giram Mill / Local</td><td>Lab Attanedant</td></tr> <tr><td>12</td><td>60285</td><td>Mostyn Estate / Indonesia</td><td>Sprayer</td></tr> <tr><td>13</td><td>30852</td><td>Mostyn Estate / Indonesia</td><td>Sprayer</td></tr> <tr><td>14</td><td>20953</td><td>Mostyn Estate / Indonesia</td><td>Sprayer</td></tr> <tr><td>15</td><td>69983</td><td>Mostyn Estate / Indonesia</td><td>Sprayer</td></tr> <tr><td>16</td><td>59024</td><td>Mostyn Estate / Indonesia</td><td>Sprayer</td></tr> <tr><td>17</td><td>24042</td><td>Mostyn Estate / Indonesia</td><td>Sprayer</td></tr> <tr><td>18</td><td>13509</td><td>Mostyn Estate / Indonesia</td><td>Sprayer</td></tr> <tr><td>19</td><td>35983</td><td>Mostyn Estate / Indonesia</td><td>LF Picker</td></tr> <tr><td>20</td><td>42206</td><td>Mostyn Estate / Indonesia</td><td>LF Picker</td></tr> <tr><td>21</td><td>32598</td><td>Mostyn Estate / Indonesia</td><td>LF Picker</td></tr> <tr><td>22</td><td>30958</td><td>Mostyn Estate / Local</td><td>LF Picker</td></tr> <tr><td>23</td><td>32570</td><td>Mostyn Estate / Indonesia</td><td>LF Picker</td></tr> <tr><td>24</td><td>49829</td><td>Giram Estate / Local</td><td>Weeding</td></tr> <tr><td>25</td><td>45165</td><td>Giram Estate / Local</td><td>Weeding</td></tr> <tr><td>26</td><td>50925</td><td>Giram Estate / Local</td><td>Weeding</td></tr> <tr><td>27</td><td>95633</td><td>Giram Estate / Local</td><td>Weeding</td></tr> <tr><td>28</td><td>30985</td><td>Giram Estate/Indonesia</td><td>LF Picker</td></tr> <tr><td>29</td><td>76568</td><td>Giram Estate/Indonesia</td><td>LF Picker</td></tr> <tr><td>30</td><td>46875</td><td>Giram Estate/Indonesia</td><td>LF Picker</td></tr> <tr><td>31</td><td>56799</td><td>Giram Estate/Indonesia</td><td>LF Picker</td></tr> <tr><td>32</td><td>56879</td><td>Giram Estate/Indonesia</td><td>LF Picker</td></tr> <tr><td>33</td><td>57890</td><td>Giram Estate/Indonesia</td><td>LF Picker</td></tr> </table>	No	Emp No	Mill/Estate/Nationality	Designation	1	10974	Giram Mill /Indonesia	FFB Grader	2	32019	Giram Mill /Indonesia	FFB Grader	3	20197	Giram Mill /Indonesia	FFB Grader	4	30291	Giram Mill / Local	Boilerman	5	32567	Giram Mill / Local	Boilerman	6	13985	Giram Mill / Local	Boilerman	7	98024	Giram Mill / Local	Water trtmt operator	8	M2094	Giram Mill / Local	Foreman	9	G3047	Giram Mill / Local	Wshop att	10	20193	Giram Mill / Local	Wshop att	11	40294	Giram Mill / Local	Lab Attanedant	12	60285	Mostyn Estate / Indonesia	Sprayer	13	30852	Mostyn Estate / Indonesia	Sprayer	14	20953	Mostyn Estate / Indonesia	Sprayer	15	69983	Mostyn Estate / Indonesia	Sprayer	16	59024	Mostyn Estate / Indonesia	Sprayer	17	24042	Mostyn Estate / Indonesia	Sprayer	18	13509	Mostyn Estate / Indonesia	Sprayer	19	35983	Mostyn Estate / Indonesia	LF Picker	20	42206	Mostyn Estate / Indonesia	LF Picker	21	32598	Mostyn Estate / Indonesia	LF Picker	22	30958	Mostyn Estate / Local	LF Picker	23	32570	Mostyn Estate / Indonesia	LF Picker	24	49829	Giram Estate / Local	Weeding	25	45165	Giram Estate / Local	Weeding	26	50925	Giram Estate / Local	Weeding	27	95633	Giram Estate / Local	Weeding	28	30985	Giram Estate/Indonesia	LF Picker	29	76568	Giram Estate/Indonesia	LF Picker	30	46875	Giram Estate/Indonesia	LF Picker	31	56799	Giram Estate/Indonesia	LF Picker	32	56879	Giram Estate/Indonesia	LF Picker	33	57890	Giram Estate/Indonesia	LF Picker
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	<p>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 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.</p> <p><b>AUDITORS' GUIDE:</b>  1) To request for the CH to prepare contracts/employment records between recruitment agencies and the employer (HQ). The document is needed during the audit.  2) To review contracts/employment offer letters signed by migrant workers in their respective country at the time of hiring.  3) Contract agreement must be available in the workers national language;  4) If (3) is not available, seek documented evidence that the contract agreement has been explained by the management official via interview with workers, training records etc.  5) Consider several job positions in overtime sampling e.g. harvesters, creche nanny, nursery,</p>	YES	<p><b>Remote</b>  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 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. Among the sampled contracts sighted during the Remote audit were as follows  Giram Palm Oil Mill: 1 local workers and 4 Indonesian workers.  Mostyn Estate: 5 Indonesian workers (manuring, sprayer &amp; harvester) and 2 local workers  Giram Estate: 3 Indonesian workers (manuring, sprayer &amp; harvester) and 2 local workers</p> <p><b>Onsite</b>  The employment contracts signed between the estate/mill management contain employment and payment terms and provisions covering duration of employment, place of work, salary, working hours, medical, accommodation, SOCSO, transportation, public holidays, sick leave, annual leave, mutual termination of service, etc.  The pay slip is the document that give accurate information on compensation for all work performed. It contains the following information: employee name, IC/passport, gang, month of pay, pay description, (basic, price bonus, productivity incentive, allowances, deductions for SOCSO, EIS, KSWP, total income for the month, total deductions, net pay.</p>																																				

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	<i>bunch grader.</i> 6) Maternity leave shall be applicable to every workers, be it local or foreign female employees.		None of the workers have family members working to help them with their work. Employment contracts and pay slips were sighted for the following workers: <table border="1"> <thead> <tr> <th>No</th><th>Emp No</th><th>Mill/Estate/Nationality</th><th>Designation</th></tr> </thead> <tbody> <tr><td>1</td><td>10974</td><td>Giram Mill /Indonesia</td><td>FFB Grader</td></tr> <tr><td>2</td><td>32019</td><td>Giram Mill /Indonesia</td><td>FFB Grader</td></tr> <tr><td>3</td><td>20197</td><td>Giram Mill /Indonesia</td><td>FFB Grader</td></tr> <tr><td>4</td><td>30291</td><td>Giram Mill / Local</td><td>Boilerman</td></tr> <tr><td>5</td><td>32567</td><td>Giram Mill / Local</td><td>Boilerman</td></tr> <tr><td>6</td><td>13985</td><td>Giram Mill / Local</td><td>Boilerman</td></tr> <tr><td>7</td><td>98024</td><td>Giram Mill / Local</td><td>Water trtmt operator</td></tr> <tr><td>8</td><td>M2094</td><td>Giram Mill / Local</td><td>Foreman</td></tr> <tr><td>9</td><td>G3047</td><td>Giram Mill / Local</td><td>Wshop att</td></tr> <tr><td>10</td><td>20193</td><td>Giram Mill / Local</td><td>Wshop att</td></tr> <tr><td>11</td><td>40294</td><td>Giram Mill / Local</td><td>Lab Attanedant</td></tr> <tr><td>12</td><td>60285</td><td>Mostyn Estate / Indonesia</td><td>Sprayer</td></tr> <tr><td>13</td><td>30852</td><td>Mostyn Estate / Indonesia</td><td>Sprayer</td></tr> <tr><td>14</td><td>20953</td><td>Mostyn Estate / Indonesia</td><td>Sprayer</td></tr> <tr><td>15</td><td>69983</td><td>Mostyn Estate / Indonesia</td><td>Sprayer</td></tr> <tr><td>16</td><td>59024</td><td>Mostyn Estate / Indonesia</td><td>Sprayer</td></tr> <tr><td>17</td><td>24042</td><td>Mostyn Estate / Indonesia</td><td>Sprayer</td></tr> <tr><td>18</td><td>13509</td><td>Mostyn Estate / Indonesia</td><td>Sprayer</td></tr> <tr><td>19</td><td>35983</td><td>Mostyn Estate / Indonesia</td><td>LF Picker</td></tr> <tr><td>20</td><td>42206</td><td>Mostyn Estate / Indonesia</td><td>LF Picker</td></tr> <tr><td>21</td><td>32598</td><td>Mostyn Estate / Indonesia</td><td>LF Picker</td></tr> <tr><td>22</td><td>30958</td><td>Mostyn Estate / Local</td><td>LF Picker</td></tr> <tr><td>23</td><td>32570</td><td>Mostyn Estate / Indonesia</td><td>LF Picker</td></tr> <tr><td>24</td><td>49829</td><td>Giram Estate / Local</td><td>Weeding</td></tr> <tr><td>25</td><td>45165</td><td>Giram Estate / Local</td><td>Weeding</td></tr> <tr><td>26</td><td>50925</td><td>Giram Estate / Local</td><td>Weeding</td></tr> <tr><td>27</td><td>95633</td><td>Giram Estate / Local</td><td>Weeding</td></tr> <tr><td>28</td><td>30985</td><td>Giram Estate/Indonesia</td><td>LF Picker</td></tr> <tr><td>29</td><td>76568</td><td>Giram Estate/Indonesia</td><td>LF Picker</td></tr> <tr><td>30</td><td>46875</td><td>Giram Estate/Indonesia</td><td>LF Picker</td></tr> <tr><td>31</td><td>56799</td><td>Giram Estate/Indonesia</td><td>LF Picker</td></tr> <tr><td>32</td><td>56879</td><td>Giram Estate/Indonesia</td><td>LF Picker</td></tr> <tr><td>33</td><td>57890</td><td>Giram Estate/Indonesia</td><td>LF Picker</td></tr> <tr><td>34</td><td>57768</td><td>Giram Estate/Indonesia</td><td>LF Picker</td></tr> <tr><td>35</td><td>47568</td><td>Giram Estate/Indonesia</td><td>LF Picker</td></tr> <tr><td>36</td><td>38234</td><td>Giram Estate/Indonesia</td><td>LF Picker</td></tr> <tr><td>37</td><td>03944</td><td>Giram Estate/Local</td><td>Hospital Assistant</td></tr> </tbody> </table>	No	Emp No	Mill/Estate/Nationality	Designation	1	10974	Giram Mill /Indonesia	FFB Grader	2	32019	Giram Mill /Indonesia	FFB Grader	3	20197	Giram Mill /Indonesia	FFB Grader	4	30291	Giram Mill / Local	Boilerman	5	32567	Giram Mill / Local	Boilerman	6	13985	Giram Mill / Local	Boilerman	7	98024	Giram Mill / Local	Water trtmt operator	8	M2094	Giram Mill / Local	Foreman	9	G3047	Giram Mill / Local	Wshop att	10	20193	Giram Mill / Local	Wshop att	11	40294	Giram Mill / Local	Lab Attanedant	12	60285	Mostyn Estate / Indonesia	Sprayer	13	30852	Mostyn Estate / Indonesia	Sprayer	14	20953	Mostyn Estate / Indonesia	Sprayer	15	69983	Mostyn Estate / Indonesia	Sprayer	16	59024	Mostyn Estate / Indonesia	Sprayer	17	24042	Mostyn Estate / Indonesia	Sprayer	18	13509	Mostyn Estate / Indonesia	Sprayer	19	35983	Mostyn Estate / Indonesia	LF Picker	20	42206	Mostyn Estate / Indonesia	LF Picker	21	32598	Mostyn Estate / Indonesia	LF Picker	22	30958	Mostyn Estate / Local	LF Picker	23	32570	Mostyn Estate / Indonesia	LF Picker	24	49829	Giram Estate / Local	Weeding	25	45165	Giram Estate / Local	Weeding	26	50925	Giram Estate / Local	Weeding	27	95633	Giram Estate / Local	Weeding	28	30985	Giram Estate/Indonesia	LF Picker	29	76568	Giram Estate/Indonesia	LF Picker	30	46875	Giram Estate/Indonesia	LF Picker	31	56799	Giram Estate/Indonesia	LF Picker	32	56879	Giram Estate/Indonesia	LF Picker	33	57890	Giram Estate/Indonesia	LF Picker	34	57768	Giram Estate/Indonesia	LF Picker	35	47568	Giram Estate/Indonesia	LF Picker	36	38234	Giram Estate/Indonesia	LF Picker	37	03944	Giram Estate/Local	Hospital Assistant
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	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	<p>There is evidence that workers observe regular working hours including overtime hours within the legal confines of the Sabah Labor Ordinance. This was verified from the mill workers' employment contracts, punch cards and interviews with the workers themselves. They are also entitled to at least 30 minutes' rest after 5 hours of work.</p> <p>Similarly, workers with medical certificates are given a paid medical leave, and female workers are given 3 months maternity leave. There is no evidence of termination, and so compliance with reasons for dismissal and period of notice could not be verified during this audit.</p> <p>Salary deductions are made for statutory deductions such as SOCSO, EPF, and EIS. For non-statutory deductions such as for payment of electricity and water bills, records are available of written permits from the Department of Labour, Sabah.</p>																				
	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	<p>Evidence is available that the SOU 29 Giram provide adequate housing and facilities to its employees in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. Houses are provided rent free. Each house has between 2 to 3 rooms and accommodate between 2 to 5 workers. Foreign workers are provided with accommodation as stated in their employment contracts. Local workers too are offered accommodation, but those who are within the local communities prefer to live outside the estate/mill premises. Among the available amenities include football fields, badminton/takraw/volleyball court, children's playground, place of worship, sundry shops and an activity hall.</p> <p>Water and electricity are also provided and the bills are shared among occupants and deducted from their wages. Free medical treatment above is provided also to all workers and their dependants. A Visiting Medical Officer (VMO) comes and visits the clinics once a fortnight to see patients and supervise the work of the Health Assistants.</p>																				
	<p><b>AUDITORS' GUIDE:</b></p> <p>1) Medical care and facilities shall be available for the employees, be it local or foreigners i.e. medical assistance, pregnancy checkup, child delivery through registered medical practitioner and vaccination.</p> <p>2) HUMANA or Child Learning Centre is available for workers' children who are ineligible</p>																						

Clause	Indicators	Comply Yes/No	Findings												
	to attend government school. 3) Recreational facilities such as children playground, football/futsal field, badminton court, praying facilities etc shows the employer considerations to good living condition for the workers and their families.														
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	All units have its own canteen and grocery store which sells basic items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within its expiry period. Workers interviewed informed that they purchase items from these stores, but also since the estates and mill are easily accessible to the nearest town, they also go out to the towns. Workers could either pay in cash, or on credit.												
	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: <ul style="list-style-type: none"><li>• An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.</li><li>• There is annual progress on the implementation of living wages</li><li>• 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</li></ul>	YES	<b>Remote</b> During this remote audit DLW are currently on draft version, but auditor needs further verification during onsite audit for the item considered in the Prevailing Wages calculation. <b>Onsite</b> All sampled workers receive at least minimum wages based on Minimum Wages Order 2020.  Giram POM, Giram Estate and Mostyn Estate had calculated the prevailing wages and in-kind benefits for their workers. The calculation included housing, electricity, water, transport to work, sports and recreation facilities, education, childcare and healthcare. The breakdown of the prevailing wages calculation as follows: <u>Giram CU</u> <table><tr><th></th><th>Local worker (RM)</th><th>Foreign worker (RM)</th></tr><tr><td>Total cost of in-kind benefits per worker</td><td>357.77</td><td>347.83</td></tr><tr><td>Average monthly take-home salary per worker</td><td>1,104.98</td><td>1,261.33</td></tr><tr><td>Total prevailing wages</td><td>1,462.75</td><td>1,609.17</td></tr></table> The auditor had verified the calculation and though the calculation was in line with RSPO Guidance on Calculation Prevailing Wages.		Local worker (RM)	Foreign worker (RM)	Total cost of in-kind benefits per worker	357.77	347.83	Average monthly take-home salary per worker	1,104.98	1,261.33	Total prevailing wages	1,462.75	1,609.17
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	<p>payment.</p> <ul style="list-style-type: none"> <li>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</li> </ul> <p>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.</p>		
	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 the estates and mill employ full-time employees. Foreign workers are full-time employees but have a contractual duration which is stipulated in their employment contracts which is 2 years for Indonesians and 3 years for other nationalities. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department.
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. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all	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 was applicable throughout all operating units and was printed and translated in Bahasa Malaysia and displayed on all notice boards throughout the CU. Briefing to the workers were done during policy trainings on 3 June 2020 (at Giram Estate) and 24 Jan 2020 (at Giram POM).
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	YES	Records of meetings between SOU 29 Giram and workers representatives are available. Sighted during the audit was minutes of meeting between Giram Palm Oil Mill management and worker representatives held on 31 Dec 2019 and 30 Jan 2020. A similar meeting was held at Mostyn Estate (11 March 2020), and Giram Estate (21 Jan 2020). All these meetings were attended by management representatives (managers, supervisors), and worker representatives (mandores local and foreign). These minutes were prepared in Bahasa Malaysia and made available upon request.
	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	YES	Evidence is available that all worker representatives were freely appointed by the workers as confirmed by the workers’ representatives themselves as confirmed by a spraying mandore from Mostyn Estate and FFB grader from Giram Palm Oil Mill.

Clause	Indicators	Comply Yes/No	Findings
such personnel.	migrant and contract workers.		
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 formal Policy on protection of children and non-employment of children is contained in the Sime Darby Social Policy dated January 2015. This undertaking to not hire child labour is included in all service contracts and supplier agreements.
	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	Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements are met throughout SOU 29 Giram. At Giram Estate, the youngest worker was born on 24 June 2000 and joined the estate on 19 Dec 2019; and at Mostyn Estate, the youngest worker was born on 12 May 2000 joined on 31 Jan 2019.
	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 any young persons were employed in any of the units at SOU 29 Giram as evidenced from documentation review, field observations and interviews.
	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	Based on the documents sighted, communication about its no child labour Policy was communicated to all levels of employees as evidenced from training records at the Giram Palm Oil Mill (6 Jan 2020), Mostyn Estate (12 Dec 2019). The training was also given to external stakeholders during stakeholder meeting held on 7 January 2020.
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 dated January 2015. Based on interviews conducted and documents reviewed, there is evidence that the Policy is being implemented. Workers interviewed confirmed their understanding of the Policy, what constitutes sexual harassment and knows how to lodge a complaint. There is no evidence of any sexual harassment or any form of harassment having occurred. Awareness on sexual and other forms of harassments were also briefed at SOU level on 6 Jan 2020, Giram Palm Oil Mill (6 Jan 2020), Giram Estate (24 Jan 2020) and Mostyn Estate (13 Jan 2020). The training was also given to external stakeholders during stakeholder meeting held on 7 January 2020
	<u>AUDITORS' GUIDE:</u> 1) There must be a policy statement and the communication shall be evident. Interview shall be carried out to confirm understanding and awareness.		
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated	YES	The policy to protect reproductive rights of women is contained in the Sime Darby Plantation Gender Policy.dated January 2015. Based on interviews conducted and documents reviewed, there is evidence that the Policy is being implemented. Workers

Clause	Indicators	Comply Yes/No	Findings
	to all levels of the workforce.		interviewed, especially women employees from all levels of the workforce confirmed their understanding of the Policy. Awareness on reproductive rights were also briefed at SOU level on 6 Jan 2020, Giram Palm Oil Mill (6 Feb 2020), Giram Estate (24 Jan 2020) and Mostyn Estate (13 Jan 2020). The training was also given to external stakeholders during stakeholder meeting held on 17 January 2020.
	<u>AUDITORS' GUIDE:</u> 1) There must be a policy statement and the communication shall be evident. Interview shall be carried out to confirm understanding and awareness.		
	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	During this audit, there has been no evidence of any new mothers and therefore this indicator could not be verified. However, based on interview conducted with the Gender Committee members at Mostyn Estate, two years ago when she was pregnant, her needs were attended to which included a private room where she could express milk and a fridge for storage was made available.
	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 1st Edition 2014. The grievance mechanism which respects anonymity and protects complainants have been effectively communicated to all levels of workforce. All sampled workers and staffs were aware of the mechanism that the Company has which provides anonymity and protects complainants.
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: <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty to the workers for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	YES	Collective evidence is available that all sampled workers have entered into employment voluntarily. This is based on the following: <ol style="list-style-type: none"> <li>a. review of sampled employment contracts which contain mutually agreed termination clause;</li> <li>b. review of documents where workers signed consenting for their passports to be kept at the office;</li> <li>c. interview with foreign workers who confirmed they could have access to the passports at any time;</li> <li>d. review of recruitment agency contract between Sime Darby Plantation Berhad and PT Wira Kasitas and PT Cahaya Lombok dated 22 April 2019 where no recruitment fee is payable by the workers and confirmed by the workers (except for passport, medical in and biometrics in home country)</li> <li>e. records of punch cards and workers confirmation that overtime work is mutually agreeable and not forced on them;</li> <li>f. confirmation from the foreign workers that they received accurate briefing in their home country on the job they would be doing in Malaysia;</li> <li>g. and confirmation from the workers that there is no debt bondage or withholding of wages.</li> </ol>
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established	YES	<b>Remote</b> The SOU 29 Giram adopts the Social Policy dated January 2015 which states that "All employees shall be treated fairly in terms of recruitment, progression, terms and

Clause	Indicators	Comply Yes/No	Findings																				
	and implemented.  <u>AUDITORS' GUIDE:</u> 1) To check the policy statement of the labour policy and to confirm the employer commitment and the implementation in safeguarding this policy. 2) To request for "Procedure in Handling Foreign Workers". Check whether the establish procedure is practical and complying to the legal requirements i.e. recruitment process, training, benefits, probation, payment of wages, renewal and management of permit/passport etc. 3) The implementation of the policy and procedure shall be supported with appropriate records.		conditions of work and representation race, caste, nationality...". There is also a procedure entitled "Sourcing Process for Foreign Workers". But This indicator need to be further verified during on site audit. <b>Onsite</b> The SOU 29 Giram adopts the Social Policy dated January 2015 which states that "All employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work and representation race, caste, nationality". There is also a procedure entitled "Sourcing Process for Foreign Workers". Based on observations and interviews of foreign workers (harvesters, sprayers, mill workers), there is no evidence of contract substitution and no discriminatory practices against foreign workers. A post-arrival briefing is also given, in particular on the contents of their employment contracts, safety, benefits, etc. The SOU 29 Giram Human Rights Charter Revised 2020, Paragraph 3.2: Respect and Uphold Labour Rights.																				
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	6.7.1 (C) The responsible person(s) for 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.	YES	<b>Remote</b> The letter of appointment for the Managers signed by the Regional CEO was sighted. The Managers subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the estates. Similar appointment was made for all the estates and the mill. 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. <b>Onsite</b> Minutes of meetings held by the mill and estates were verified. The meetings were held on as follows: <table><tr><th>No</th><th>Estate/Mill</th><th>Date</th><th>Date</th><th>Date</th></tr><tr><td>1</td><td>Giram Estate</td><td>03/12/2019</td><td>24/02/20</td><td>24/6/20</td></tr><tr><td>2</td><td>Giram POM</td><td>30/12/2019</td><td>26/02/2020</td><td>2/06/2020</td></tr><tr><td>3</td><td>Mostyn estate</td><td>19/12/2019</td><td>13 /03/2020</td><td>25/06/20</td></tr></table> At the meetings workers participated in the discussion mainly on housing and safety. All units adopted the agenda as released SQM. This agenda list was sighted and adequate to discuss salient issues relating safety, environmental and health. The agenda as discussed during the meeting among others includes the following; a) <i>Laporan Pemakaian PPE</i> b) <i>Laporan Prestasi ESH/Kesehatan</i> c) <i>Laporan Latihan &amp; SOP/HIRARC</i> d) <i>Laporan Pematuhan Undang-Undang</i>	No	Estate/Mill	Date	Date	Date	1	Giram Estate	03/12/2019	24/02/20	24/6/20	2	Giram POM	30/12/2019	26/02/2020	2/06/2020	3	Mostyn estate	19/12/2019	13 /03/2020	25/06/20
No	Estate/Mill	Date	Date	Date																			
1	Giram Estate	03/12/2019	24/02/20	24/6/20																			
2	Giram POM	30/12/2019	26/02/2020	2/06/2020																			
3	Mostyn estate	19/12/2019	13 /03/2020	25/06/20																			

Clause	Indicators	Comply Yes/No	Findings
			e) <i>Laporan Pematuhan Oleh Kontraktor</i> f) <i>Laporan Kemalangan</i> g) <i>Laporan SIME</i> h) <i>Laporan Pemeriksaan Tempat Kerja</i> i) <i>Laporan Kesihatan &amp; Kawasan Perumahan</i> j) <i>Laporan Bahan Buangan Terjadual/Isu Alam Sekitar</i>
	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	<p><b>Remote</b>            Accident and emergency procedures are available in adherence to the SPSB policy on 'Crisis Management &amp; 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 &amp; 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.            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. Cases if any are reviewed during safety meetings.</p> <p>a) Giram Estate for year 2019 5 accidents recorded has been reported. Sighted action by CU to investigated, risk assessed, reported to DOSH, and insurance claims has been carried out. Sighted JKKP 8 (annually report) has been submitted to DOSH on 13/01/2020</p> <p>b) Mostyn Estate for year 2019 11 accidents recorded has been reported. Sighted action by CU to investigated, risk assessed, reported to DOSH, and insurance claims has been carried out. Sighted JKKP 8 (annually report) has been submitted to DOSH on 15/01/2020</p> <p>c) Giram Palm Oil Mill for year 2019 6 accidents recorded has been reported. Sighted action by CU to investigated, risk assessed, reported to DOSH, and insurance claims has been carried out. Sighted JKKP 8 (annually report) has been submitted to DOSH on 23/01/2020</p> <p>Where required submissions of JKKP 6, 7 &amp; 8 to DOSH were compiled under the legislative requirement. Investigations and revision of HIRARC where appropriate were made accordingly. Further verification will be done onsite.</p> <p><b>Onsite</b>            Accident and emergency procedures are available in adherence to the SPSB policy on</p>

Clause	Indicators	Comply Yes/No	Findings
			<p>'Crisis Management &amp; 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 was formation of ERP Team &amp; ERP for all the identified incidences. The organisation chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were produced by PSQM and amended to tailor to the situation differences in the estates and mills.</p> <p>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.</p> <p>Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKPP 8. Records are kept in the office. Summary for the year is described in the JKPP 8 a mandatory requirement for submission to DOSH by Jan of the subsequent year. Cases if any are reviewed during safety meetings.</p> <p>Where required submissions of JKPP 6, 7 &amp; 8 to DOSH were compiled under the legislative requirement. Investigations and revision of HIRARC where appropriate were made accordingly.</p>
	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	<p>All staff and workers such as the storekeepers, harvesters and sprayers were continuously trained, and random interviews conducted showed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner. Appropriate PPE were given free of charge to all employees of estates visited. They were seen to wearing PPE such as face masks respirators, goggles, nitrile gloves, apron and hard hat, to cover all potentially hazardous operations such as mixing of pesticides and pesticide application. Meanwhile, during site inspection at Giram POM workers were provided with ppe such as helmet, safety boots, ear plugs, leather gloves, reflector jacket and most of the moving part and rotating machinery were installed with machine guarding and properly covered.</p> <p>During site visit at chemical and premix area stores, sanitation facilities for sprayer and manuring operator were available for workers to wash their PPE and clothes.</p>
	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	YES	<p>Local &amp; Foreign workers are covered by SOCSO (Pertubuhan Keselamatan Sosial). The "Jadual Caruman Bulanan" for August 2020 were reviewed for the following Acknowledgement contribution received (ACR),</p>

Clause	Indicators	Comply Yes/No	Findings																														
	accordance with Malaysian law.		<u>Mostyn Estate</u> employer code: F9300007149Z and form 8A for 318 employees																														
	<u>AUDITORS' GUIDE:</u> 1) To ensure that there is no gap in between the period of the renewal of permit and the actual submission of application. It is to confirm that the workers, including foreign are covered by insurance at all time.		<u>Giram Estate</u> employer code: F930000172K and form 8A for 430 employees																														
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	<b>Remote</b> 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. Cases if any are reviewed during safety meetings. <b>Onsite</b> 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. Cases if any are reviewed during safety meetings. <table><tr><td></td><td>Estate/Mill</td><td colspan="4">Accident Cases 2019</td></tr><tr><td></td><td></td><td>LTI cases</td><td>No of LTI</td><td>Non-LTI Cases</td><td>LTI</td></tr><tr><td>1</td><td>Giram Estate</td><td>5</td><td>29</td><td>0</td><td>5</td></tr><tr><td>2</td><td>Giram POM</td><td>2</td><td>11</td><td>0</td><td>2</td></tr><tr><td>3</td><td>Mostyn Estate</td><td>5</td><td>6</td><td>0</td><td>5</td></tr></table> Accident statistics was reviewed during Health and Safety committee meeting & through OSH committee investigation accident. It was evident in the minutes of the meeting.  Where required submissions of JKKP 6, & 8 to DOSH were complied with under the legislative requirement. Investigations and revision of HIRARC where appropriate were made accordingly. Mainly all estates recorded incidences are related to harvesting activities.		Estate/Mill	Accident Cases 2019						LTI cases	No of LTI	Non-LTI Cases	LTI	1	Giram Estate	5	29	0	5	2	Giram POM	2	11	0	2	3	Mostyn Estate	5	6	0	5
	Estate/Mill	Accident Cases 2019																															
		LTI cases	No of LTI	Non-LTI Cases	LTI																												
1	Giram Estate	5	29	0	5																												
2	Giram POM	2	11	0	2																												
3	Mostyn Estate	5	6	0	5																												

**Principle 7: Protect, conserve and enhance ecosystems and the environment**

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 Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	<p><b>Remote</b></p> <p>All the 2 estates in the CU continued to implement Integrated Pest Management (IPM). The estates continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by <i>the ARM Section No 15–Pest And Diseases</i> The IPM program among others involved the following practices;</p> <ul style="list-style-type: none"> <li>a) Includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and <i>ganoderma</i>.</li> <li>b) In order to minimize use of pesticides and bagworm control the estates had planted beneficial plants mainly <i>Tunera subulata</i>, <i>cassia cobanensis</i> and <i>Antigonon leptopus</i> with maps indicating areas planted.</li> </ul> <p>All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year. Baiting was continued until bait acceptance fell below 20%. Further verification will be verify during onsite.</p> <p><b>Onsite</b></p> <p>SOU Giram continued to implement Integrated Pest Management (IPM) in the 2 estates and continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Agricultural Reference Manual (ARM) Section 15 -Plant Protection.</p> <p>The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. For bagworm control the program includes the planting of beneficial plants such as <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i> and <i>Turnera subulata</i> and for rhinoceros beetles is by using pheromone traps.</p> <p>In order to minimize use of pesticides the estates had planted beneficial plants mainly <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> with maps indicating areas planted.</p> <p>All 2 estates carried out census on rat damage and diseases like Ganoderma. The IPM technique to control rats includes rearing barn owls (<i>Tyto alba</i>) and rat baiting was by calendar baiting at 2 campaigns per year. Rat baiting would continued until bait acceptance fell below 20%. The procedure referred was in the Agricultural Reference Manual (ARM) Section 15 - Plant Protection.</p> <p>During the audit, it was observed a number of beneficial plants had been planted and the estates had seedlings in polybags, ready for planting in the Nursery. Records showed that beneficial plants were continuously planted in by the 4 estates visited at the average rate of 5.0m/ha.</p>
	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	YES	Species referenced in the Global Invasive Species Database and CABI.org. were not used in managed areas of the 2 estates.

Clause	Indicators	Comply Yes/No	Findings																																				
	are implemented.																																						
	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	SOU Giram continued to use the Sime Darby Plantation Berhad’s policy of no open burning. As advocated, the 2 estates practised Zero burning thus no use of fire for pest control. In the 2018, 2019 and 2020 replants visited during the audit in the estates, it was evident that all palms were felled, shredded, windrowed and left to decompose.																																				
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	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	<b>Remote</b> All 2 estates only used pesticides that are officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision Pesticides Act 1974 (Act 149) (Section 53A); and in accordance with USECHH Regulations (2000). There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used. The chemical store and chemical list indicated All 2 estates had none of the chemicals. The use of paraquat was banned in all SDPB estates. Most pesticides used were class III & class IV. All the 2 estates confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000. a) The review of the chemical register concluded that all pesticides used were of class II, III & class IV. The use of <i>paraquat</i> had been prohibited in all SDP estates. b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. The chemical used in the estate captured from the chemical register updated on January/February 2020. Among others as listed below; <table><tr><th>No</th><th>Chemical name</th><th>Class</th><th>No</th><th>Chemical name</th><th>Class</th></tr><tr><td>1</td><td>Glyphosate isopropylamine</td><td>III</td><td>6</td><td>Triclopyr butoxy e/ester</td><td>III</td></tr><tr><td>2</td><td>Glufosinate ammonium</td><td>III</td><td>7</td><td>Canyon 20G</td><td>IV</td></tr><tr><td>3</td><td>Triclopyr butoxy</td><td>III</td><td>8</td><td>Propined</td><td>III</td></tr><tr><td>4</td><td>Metsulfuron methy 20% w/w</td><td>III</td><td>9</td><td>3-(alpha acetonylbenzyl)-hydroxycoumarin</td><td>IV</td></tr><tr><td>5</td><td>Cypermethrin</td><td>III</td><td></td><td></td><td></td></tr></table> Further verification will be verify during onsite. <b>Onsite</b> Written justification in Standard Operating Procedure (SOP) of all agrochemical was available in Section 15 and 16 of the Agricultural Reference Manual issue:1 version:3 dated 1/7/2011, and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. 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. Sighted chemical register updated yearly, which is latest on 31/1/20 (Giram), 18/2/20 (Mostyn) and 25/2/20 (Giram POM).	No	Chemical name	Class	No	Chemical name	Class	1	Glyphosate isopropylamine	III	6	Triclopyr butoxy e/ester	III	2	Glufosinate ammonium	III	7	Canyon 20G	IV	3	Triclopyr butoxy	III	8	Propined	III	4	Metsulfuron methy 20% w/w	III	9	3-(alpha acetonylbenzyl)-hydroxycoumarin	IV	5	Cypermethrin	III			
No	Chemical name	Class	No	Chemical name	Class																																		
1	Glyphosate isopropylamine	III	6	Triclopyr butoxy e/ester	III																																		
2	Glufosinate ammonium	III	7	Canyon 20G	IV																																		
3	Triclopyr butoxy	III	8	Propined	III																																		
4	Metsulfuron methy 20% w/w	III	9	3-(alpha acetonylbenzyl)-hydroxycoumarin	IV																																		
5	Cypermethrin	III																																					

Clause	Indicators	Comply Yes/No	Findings
			All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II class III & class IV pesticides. The Manual has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs.
	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 2 Estates, Giram Estate and Mostyn Estate had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and Ai/Ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. Both estates had documented programs for spraying pesticides and for rat baiting.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	As part of the IPM plans, the quantity of pesticides required for various field conditions are documented and justified in Sime Darby Plantation Berhad Agriculture Reference Manual (ARM) Section 16.5. The implementation in the field were consistent with the ARM and the following practices were adopted by the estates; a) Established growth of beneficial plants ( <i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Tunera subulata</i> ) to attract natural predators and parasitoids and reduce use of insecticides. During the site visit the auditor observed notable quantity of beneficial plants been planted at average rate of 5.0m/ha. b) The estates in order to reduce the use of pesticides to control rats, use Barn Owls ( <i>Tyto alba</i> ) instead. Census was conducted and recorded. The current ratio is maintained at 1 box/ 10 ha as per the ARM guidelines.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	There was no evidence of prophylactic use of pesticides in SOU Giram except in immature and young fields, where prophylactic spraying using diluted cypermethrin are still practised for the Pest and Diseases management such as control of Rhinoceros Beetle as per SOP. SOU Giram 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 Sime Darby Plantation Berhad estates since 07/11/2006.
	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	YES	<b>Remote</b> SOU Giram 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 Sime Darby Plantation Berhad estates since 07/11/2006. 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 used. Methamidophos was used in 2014 for trunk injection to treat bagworm attack. Since 2016, Sime Darby Plantation Berhad had replaced the usage of Methamidophos to Acephate a class III chemical.

Clause	Indicators	Comply Yes/No	Findings																				
	process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:		<b>Onsite</b> From records and interviews 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.																				
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	As mentioned above in 7.2.5.of this check list and based on audit findings, 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 and paraquat had been used. Hence, the need for a judgment of the threat assessment does not apply on the SOU Giram.																				
	7.2.5b Why there is no other alternative which can be used.	YES	As mentioned above in 7.2.5.of this check list and based on audit findings, 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 and paraquat had been used. Hence, the need for other alternative which can be used does not apply on the SOU Giram.																				
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES	As mentioned above in 7.2.5.of this check list and based on audit findings, 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 and paraquat had been used. Hence, the need for other less hazardous alternative does not apply on the SOU Giram.																				
	7.2.5d What is the process to limit the negative impacts of the application.	YES	As mentioned above in 7.2.5.of this check list and based on audit findings, 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 and paraquat had been used. Hence, the need for the process to limit the negative impacts of the application does not apply on the SOU Giram.																				
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	As mentioned above in 7.2.5.of this check list and based on audit findings, 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 and paraquat had been used. Hence, the need for an estimation of the timescale of the application and steps taken to limit application to the specific outbreak does not apply on the SOU SOU Giram.																				
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed 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	YES	<b>Remote</b> The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that SDS are available at all sites during the audit. Trainings on pesticide handling were available in all the visited estates. Among others extracted for records are; <table border="1"> <thead> <tr> <th>No</th><th>Estate</th><th>Date</th><th>Subject</th></tr> </thead> <tbody> <tr> <td>1</td><td>Giram</td><td>23/1/20</td><td>SOP trunk Injection Training</td></tr> <tr> <td></td><td></td><td>20/2/20</td><td>Pnd Sprayer Training</td></tr> <tr> <td>2</td><td>Mostyn</td><td>25/2/20</td><td>Chemical handlings Sprayer</td></tr> <tr> <td>3.</td><td>Giram POM</td><td>26/1/20</td><td>Chemical Handling training</td></tr> </tbody> </table>	No	Estate	Date	Subject	1	Giram	23/1/20	SOP trunk Injection Training			20/2/20	Pnd Sprayer Training	2	Mostyn	25/2/20	Chemical handlings Sprayer	3.	Giram POM	26/1/20	Chemical Handling training
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Clause	Indicators	Comply Yes/No	Findings																								
	regular updates on the knowledge about the activity they carry out.		<p>The training included the safety aspects and usage of PPE when handling with pesticides. Further verification will be verify during onsite.</p> <p><b>Onsite</b> The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that SDS are available at all sites during the audit. Trainings on pesticide handling were available in all the visited estates. Among others extracted for records are;</p> <table border="1"> <thead> <tr> <th>No</th><th>Estate</th><th>Date</th><th>Subject</th></tr> </thead> <tbody> <tr> <td rowspan="3">1</td><td rowspan="3">Giram</td><td>20/2/20</td><td>Chemical/lubricant spillage training</td></tr> <tr> <td>20/1/20</td><td>P&amp;D Sprayer Training</td></tr> <tr> <td>23/1/20</td><td>SOP trunk Injection Training</td></tr> <tr> <td rowspan="3">2</td><td rowspan="3">Mostyn</td><td>25/1/20</td><td>Chemical handlings Sprayer</td></tr> <tr> <td>10/2/20</td><td>Chemical handlings Nursery</td></tr> <tr> <td>25/2/20</td><td>Emergency Respond Plan training</td></tr> <tr> <td>3.</td><td>Giram POM</td><td>26/1/20</td><td>Chemical Handling training</td></tr> </tbody> </table> <p>The training included the safety aspects and usage of PPE when handling with pesticides. Record of training was available for verification. All workers involved in pesticide application 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.</p>	No	Estate	Date	Subject	1	Giram	20/2/20	Chemical/lubricant spillage training	20/1/20	P&D Sprayer Training	23/1/20	SOP trunk Injection Training	2	Mostyn	25/1/20	Chemical handlings Sprayer	10/2/20	Chemical handlings Nursery	25/2/20	Emergency Respond Plan training	3.	Giram POM	26/1/20	Chemical Handling training
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	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	<p>The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149).</p> <ul style="list-style-type: none"> <li>a) Records of purchase, storage and use were maintained.</li> <li>b) All store buildings were equipped with exhaust fans with the door secured.</li> <li>c) Only authorized personnel are assigned to handle the chemicals.</li> <li>d) All the chemicals were segregated in storage accordingly.</li> </ul> <p>Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Thereafter disposal arrangement will follow accordingly as per procedures.</p>																								
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	<p>The procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established. Collection of SW and thereafter disposal inclusive of Scheduled waste are disposed to <i>Lagenda Bumimas Sdn Bhd</i> and clinical waste to <i>Sedafiat Sdn Bhd</i> a DOE licensed vendor. Empty containers were tripled rinsed, pierced and delivered to the SW collector. Domestic wastes are individually collected and delivered to the estates respective landfill. Collection at interval of 2-3x/week.</p>																								

Clause	Indicators	Comply Yes/No	Findings
			<p>SW has being disposed to an authorized vendor such as:</p> <ul style="list-style-type: none"> <li>Giram Estate <ul style="list-style-type: none"> <li>-inventory of waste submit to DOE by monthly basis. Latest on 25/08/2020.</li> <li>-last disposed has been made on 28/05/20 for SW102, SW408, SW409, SW410, SW 305, and SW 306.</li> </ul> </li> <li>Giram POM <ul style="list-style-type: none"> <li>-inventory of waste submit to DOE by monthly basis. Latest on 30/03/2020</li> <li>-sighted application letter to DOE for extension of disposal of SW on 02/04/2019</li> <li>-last disposed has been made on 17/10/2019 for SW 305, SW 306, SW 322, SW 323, SW 409, SW 410.</li> </ul> </li> <li>Mostyn Estate <ul style="list-style-type: none"> <li>-inventory of waste submit to DOE by monthly basis. Latest on 31/08/20</li> <li>-last disposed has been made on 27/05/20 for SW 102, SW 305, SW 408, SW 410, SW 404, SW 102, SW 305, SW 408.</li> </ul> </li> </ul>
	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	<p><b>Remote</b> SOU Giram were committed to minimise the usage of agrochemicals by implementing IPM. Blanket spraying was not practised by this SOU but further verification need to address during onsite.</p> <p><b>Onsite</b> There was no aerial spraying has been practiced in the Giram SOU. <i>Neproliphis biserata</i> was maintained and encouraged to be planted in Giram CU. This can be seen in their continuous improvement plan. This was to suppress growth of noxious weeds and thus reduce the use of pesticides for selective weeding. Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced in order to encourage soft grasses in inter row and frond stacking area.</p>
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	<p><u>Mostyn Estate</u></p> <ul style="list-style-type: none"> <li>CHRA assessment has been carried out by Haji Shaari Chin on 18/08/18 (DOSH registration no: (JKKP HIE 127/171-2(124)) from Global Advance Training and Consultancy. The assessment has been carried out at 7 working units such as chemical mixer, sprayer, manuring operator, rat bait operator, foremen, schedule waste, and storekeeper.</li> <li>Medical surveillance and audiometric test has been carried out on 26/09/19 by OHD Dr Chia Cheng (DOSH registration no: HQ/13/DOC/00/315) from Klinik Mobello Kunak. For 43 employees (sprayer, manuring operator, pump attendant, electrician, fogger, storekeeper, water treatment plant operator, driver, and foremen). Results were satisfactory and fits to handle chemicals</li> </ul> <p><u>Giram Estate</u></p> <ul style="list-style-type: none"> <li>CHRA assessment has been carried out by Ong Sau Yuet on 14/02/20 (DOSH registration no:</li> </ul>
	<p><b>AUDITORS' GUIDE:</b> 1) Please note that this requirement is mandatory and not depending on the recommendation made by a CHRA assessor.</p>		

Clause	Indicators	Comply Yes/No	Findings
			<p>(JKKP IH/127/171-2(75)) from Envosha Sdn Bhd. The assessment has been carried out for working units such as chemical mixer, sprayer, manuring operator, foremen, schedule waste, and storekeeper.</p> <ul style="list-style-type: none"> <li>Medical surveillance and audiometric test has been carried out on 18/11/19 by OHD Dr Chia Cheng (DOSH registration no: HQ/13/DOC/00/315) from Klinik Mobello Kunak. For 52 employees (sprayer, manuring operator, pump attendant, electrician, fogger, storekeeper, water treatment plant operator, driver, and foremen). Results were satisfactory and fits to handle chemicals.</li> </ul>
	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	<p>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. <i>Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan</i>). During site visits there was no breastfeeding women and under age of 18 workers involved in chemical applications.</p> <p>All estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.</p>
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	<p>SOU Giram has identified all wastes and sources of pollution. The Waste Management Action Plan FY 2020 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:</p> <ul style="list-style-type: none"> <li>Air – sources from boiler stack (smoke and particulate), vehicle &amp; generator (smoke and gases), anaerobic processes (ETP, EFB dumping – biogas emission) – GHG.</li> <li>Water – cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) &amp; boiler quenching water and blowdown.</li> <li>Land – scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.</li> </ul> <p>Action taken:</p> <ul style="list-style-type: none"> <li>Air emission has been controlled by mill by installed the ESP to captured particulate emission from boiler emission</li> <li>Final discharge water has been monitored by monthly basis by accredited laboratory and reported to DOE.</li> <li>SW has been disposed through DOE contractor and domestic waste has been disposed through Majlis Daerah Tawau Bukit Gemok land fill area.</li> </ul>
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is	YES	<p>At Giram SOU domestic waste has been disposed through Majlis Daerah Tawau Bukit Gemok land fill area which is nearby to all estate.</p>

Clause	Indicators	Comply Yes/No	Findings
	demonstrated.		
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit at SOU Giram, there were no evidence on waste material has been disposed using fire. All the waste material (domestic & scheduled waste) has been disposed accordingly. Site visits at replanting areas showed all the palms have been chipped and left for decomposed.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	<p>Giram CU continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer applications. The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents;</p> <ul style="list-style-type: none"> <li>a) EQMS chapter B8 - Leguminous Cover Crops</li> <li>b) EQMS chapter B14 – Manuring</li> <li>c) ARM Section 8 – Manuring</li> <li>d) ARM Section 2 – Nursery Techniques</li> <li>e) ARM Section 4 – Land Preparation</li> <li>f) ARM Section 17 – Leguminous Cover Crop Establishment</li> </ul> <p>The process of the fertilizer application follows a flow chart Fertilizer application, which was of upmost importance for maintenance of soil commencing from an agronomist visit for a leaf sampling to determine the level of nutrient therein. Thereafter the calculation will be made for an input of fertilizer to maintain/improve the nutrient at the desired level. Estates will use this input for the entire requirement in the field identified.</p>
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	<p>The periodic tissue and soil sampling were carried out in the estates to monitor changes in nutrient status. The results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. Soil samplings are made on a 5 year cycle to detect the following analysis.</p> <ul style="list-style-type: none"> <li>a) PH, Carbon</li> <li>b) Total N, P, K, Ca, Mg, Na</li> </ul> <p>The soil sampling analysis by Sime Darby Plantations Research Centre was carried out to facilitate the 2020 fertilizer program. Records of visits as shown below;</p> <ul style="list-style-type: none"> <li>a) 3/12/2019 for Giram Estate</li> <li>b) 4/12/2019 for Mostyn Estate</li> </ul>
	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	<p><b>Remote</b></p> <p>All 2 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.</p> <p><b>Onsite</b></p> <p><u>EFB Application</u></p> <p>Records sighted on EFB applied in 2020 was as follows:</p>

Clause	Indicators	Comply Yes/No	Findings						
			<table><tr><td>Estate</td><td>M Tons</td></tr><tr><td>Giram</td><td>2,702.53</td></tr><tr><td>Mostyn</td><td>2,359.22</td></tr></table> <p>POME were only applied at Giram Estate amount of 21mt.</p>	Estate	M Tons	Giram	2,702.53	Mostyn	2,359.22
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	7.4.4 Records of fertiliser inputs are maintained.	YES	<p>SOU Giram continued to monitor their fertilizer inputs as recommended by their Principal Agronomist, Plant Nutrition &amp; Protection, Sabah Region, based in Bombalai who visited both estates during the annual foliar sampling carried out on 3/12/2019 and 4/12/2019 in Giram and Mostyn Estate respectively.</p> <p>Fertiliser application program was monitored using records like manuring master plan, program sheets, bin cards, field cost book, manuring audits by Planning and Monitoring Department (PMU) under Upstream Department from Headquarters. Records of programs and applications of fertilisers were made available to auditors. Noted from the records that the actual amount of fertilisers applied in 2019 were completed in both Giram and Mostyn Estate. The main fertilizers recommended for Mature Oil Palms for 2019 were Ammonium Chloride, Muriate Of Potash, Kieserite, GML, Borate 48% and Rock Phosphate. No fertilizers had been recommended for fields to be replanted within the next 2 years.</p> <p>For Immature Oil Palms in Giram and Mostyn Estate, the fertilizers recommended were Ammonium Chloride, Muriate Of Potash, Kieserite, Borate 48% and Rock Phosphate, Compound 25, and Compound 45. From the review of the records, it was noted that the actual fertilizer application for 2019 was in line with the recommendation.</p>						
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	<p>During the field visit and the soil map provided it was observed that no fragile or marginal soils found in Giram SOU. In Mostyn Estate the soil comprises of Bombalai, Table, Binuang, Sogomana/Cherang Hangus and Luba series. As for Giram Estate, it was mainly Bedup, Kinabutan, Jarangan, Tanjong Lipat, Sipit, Kumansi, and Paliu series.</p>						
	7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	<p>SOU Giram had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ul style="list-style-type: none"><li>Slope &amp; River Protection Policy updated on January 2015.</li><li>Buffer Zone &amp; 25degree slope and in item 8 Section 4</li><li>Land Preparation for Terracing in ARM Manual.</li></ul> <p>It was observed that no replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the SOU.</p> <p>It was also observed that practices to minimise and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines.</p> <p>Cover crop were planted in the replants and in some mature areas. The cover crop <i>Mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>Neprolepis biserrata</i> in the inter rows were sighted during the visit.</p>						
	7.5.3 There is no new planting of			<p>SOU Giram had a management strategy for planting on slopes to minimise and control erosion and</p>					

Clause	Indicators	Comply Yes/No	Findings
	oil palm on steep terrain.		degradation of soils. It was observed that there is no new planting of oil palm on steep terrain.
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	SOU Giram had a management strategy for palm oil cultivation, taking into account the soil maps and surveys identifying marginal and fragile soils, including steep terrain for the palm oil palm long term suitability. The soil maps were provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in SOU Giram.
	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	Based on document review and site visits, there is no new extensive planting on marginal and fragile soils in Giram SOU.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	SOU Giram had a management strategy for palm oil cultivation taking into account the soil surveys and topographic information in planning of drainage and irrigation systems, roads and other infrastructure. The topographic information were provided and reviewed by the auditors.
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	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 <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to all four estates. Based on the audit findings, it has been confirmed that there were no new planting or new development of areas at SOU Giram.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: 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).	YES	It has been confirmed that SOU Giram did not have peat land. It is consistent with the new soils map provided by Precision Agriculture Unit (NHM) of Sime Darby Research. Hence, this requirement is not applicable.
	7.7.3 (C) Subsidence of peat is monitored, documented and	YES	It has been confirmed that SOU Giram did not have peat land. It is consistent with the new soils map provided by Precision Agriculture Unit (NHM) of Sime Darby Research. Hence, this requirement is not

Clause	Indicators	Comply Yes/No	Findings
	minimised.		applicable.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	It has been confirmed that SOU Giram did not have peat land. It is consistent with the new soils map provided by Precision Agriculture Unit (NHM) of Sime Darby Research. Hence, this requirement is not applicable.
	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 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	It has been confirmed that SOU Giram did not have peat land. It is consistent with the new soils map provided by Precision Agriculture Unit (NHM) of Sime Darby Research. Hence, this requirement is not applicable.
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for	YES	It has been confirmed that SOU Giram did not have peat land. It is consistent with the new soils map provided by Precision Agriculture Unit (NHM) of Sime Darby Research. Hence, this requirement is not applicable.

Clause	Indicators	Comply Yes/No	Findings
	existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.		
	7.7.7 (C) All areas of unplanted and set-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.	YES	It has been confirmed that SOU Giram did not have peat land. It is consistent with the new soils map provided by Precision Agriculture Unit (NHM) of Sime Darby Research. Hence, this requirement is not applicable.
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: 7.8.1a The unit of certification 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	Both the Mill and the estates had its <i>Water Management Plan for 2020</i> which was developed in order to maintain the quality and availability of natural water resources by practicing efficient water consumption through various methods; among others a) implementation of rain water harvest, b) construction of water gate for effective management of collection/main drain, c) Establishment of <i>Mucuna bracteata</i> to prevent erosion, side drain at field road to control water, frond stacking, enhancement of ground vegetation at bare ground area. The CU has also identified actions to be taken in the event of water supply shortage, a) Workers quarters were provided with separate tanks for rain water harvesting used for washing. b) Water for consumption is supplied in separate tanks and amount used being monitored. c) Water from triple rinsing of pesticide containers was reused for spraying. d) Records of rainfall data to assist in the water management plans were sighted from 2010 (10 years spectrum). The mill practices recycling processing water, a) Recycled condensate water, to use back water treated from POME to cleaning purpose at mill and hydro cyclone operation during water shortage, b) collection of rain Waters,

Clause	Indicators	Comply Yes/No	Findings																
			<div><div><div>c) Line site Water usage Monitoring, d) Contingency Plan during dry spell/shortage has been established. e) Contingency plan during water shortage</div><table><tr><th></th><th>Area/incident</th><th>Action steps</th><th>PIC</th></tr><tr><td>1</td><td>Water shortage/ prolonged dry season</td><td>-to obtain water from mill/other estate pond  -to train/educate staff/workers to conserve water to seek assistance from authorities to obtain treated water supply.</td><td>Mill Engineer Estate Executives</td></tr><tr><td>2</td><td>Rain Water harvesting</td><td>Rain water will be recycled for washing heavy machinery, dry cleaning, and chemical premixing.</td><td>Mill Engineer Estate Executives</td></tr><tr><td>3</td><td>Waste water from chemical premixing and washing PPE</td><td>Reused all the waste water for chemical premixing</td><td>Estate Executives</td></tr></table></div></div>		Area/incident	Action steps	PIC	1	Water shortage/ prolonged dry season	-to obtain water from mill/other estate pond  -to train/educate staff/workers to conserve water to seek assistance from authorities to obtain treated water supply.	Mill Engineer Estate Executives	2	Rain Water harvesting	Rain water will be recycled for washing heavy machinery, dry cleaning, and chemical premixing.	Mill Engineer Estate Executives	3	Waste water from chemical premixing and washing PPE	Reused all the waste water for chemical premixing	Estate Executives
	Area/incident	Action steps	PIC																
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2	Rain Water harvesting	Rain water will be recycled for washing heavy machinery, dry cleaning, and chemical premixing.	Mill Engineer Estate Executives																
3	Waste water from chemical premixing and washing PPE	Reused all the waste water for chemical premixing	Estate Executives																
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	YES	<div><div><div>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at the Giram Estate and Mostyn Estate. Riparian buffer zones have been identified and demarcated. No chemicals and fertilizer application observed been used in their maintenance. In some area's <i>vetiver</i> grass had been planted along the river banks. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (<i>Management of River Reserve in Sime Darby Plantation dated April 2014</i>). The buffer zones established are as following:</div><table><tr><th></th><th>River width</th><th>Buffer zone</th></tr><tr><td>1</td><td>&gt; 40 meters</td><td>50 meters</td></tr><tr><td>2</td><td>20 - 40 meters</td><td>40 meters</td></tr><tr><td>3</td><td>10 - 20 meters</td><td>20 meters</td></tr><tr><td>4</td><td>5 - 10 meters</td><td>10 meters</td></tr></table></div></div>		River width	Buffer zone	1	> 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	
	River width	Buffer zone																	
1	> 40 meters	50 meters																	
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Clause	Indicators	Comply Yes/No	Findings										
			<table><tr><td>5</td><td>&lt; 5 meters</td><td>5 meters</td></tr></table> <p>During the field visit to all the estates it was observed that all the buffer zones and watercourses boundaries were maintained without noting any sign of spraying made in the identified areas.</p>	5	< 5 meters	5 meters							
5	< 5 meters	5 meters											
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	YES	License no. 003573 and validity until 30/06/2020. The license indicated the capacity of the mill as 60mt/hr and the discharge method of the treated POME is to land irrigation. Analysis of the final discharge was carried out on monthly basis through accredited laboratory. The analysis results were submitted to DOE through the quarterly report (OER systems). The first quarter of the 2020 report was submitted to DOE on 13/04/2020. Results indicated compliance to the regulatory limit.										
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	<p>Mill water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis. The following were sampled:</p> <table><tr><th>Month</th><th>Jan 2020</th><th>Feb 2020</th><th>Mar 2020</th><th>Average 2019</th></tr><tr><td>Consumption Water m<sup>3</sup> / tonne FFB Processed</td><td>1.71</td><td>1.23</td><td>1.22</td><td>1.52</td></tr></table> <p>A slightly higher water usage noted, probably due to the proportionate reduction in volume of FFB being processed and for cleaning process</p>	Month	Jan 2020	Feb 2020	Mar 2020	Average 2019	Consumption Water m <sup>3</sup> / tonne FFB Processed	1.71	1.23	1.22	1.52
Month	Jan 2020	Feb 2020	Mar 2020	Average 2019									
Consumption Water m <sup>3</sup> / tonne FFB Processed	1.71	1.23	1.22	1.52									
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	<p>Plan for improving efficiency of the use of fossil fuels and to optimise renewable energy has established such as:</p> <table><tr><th>No.</th><th>Energy</th><th>Action plan</th><th>PIC</th></tr><tr><td>1</td><td>Diesel</td><td>-servicing vehicle in timely manner and on contractual basis to ensure efficient use of fuel and preventive maintenance to avoid leakages. -to educate workers by having program on fuel saving practices i.e turn off the engine when vehicle not in used. -no open burning at linesite</td><td>Assistant manager &amp; foremen</td></tr></table>	No.	Energy	Action plan	PIC	1	Diesel	-servicing vehicle in timely manner and on contractual basis to ensure efficient use of fuel and preventive maintenance to avoid leakages. -to educate workers by having program on fuel saving practices i.e turn off the engine when vehicle not in used. -no open burning at linesite	Assistant manager & foremen		
No.	Energy	Action plan	PIC										
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Clause	Indicators	Comply Yes/No	Findings			
			2.	Electricity	-installing energy saving appliances, replacing energy saving bulb at workers quarters and using photo - censor to light up street light & compound spotlight. -educate workers on saving energy usage i.e turn off electric switch when not in use	Assistant Manager & QA
			<p><b>Onsite</b> 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 2020, identified in the following i) Environmental Aspect Identification Summary FY 2020 reviewed accordingly. ii) Environmental Impact Evaluation Summary FY 2020 reviewed accordingly.</p> <p><u>Giram POM</u> Fossil fuel Reduction Plan for Financial Year 2020 was established and monitored. Reduce Diesel usage – by monitoring and maintaining the maintenance of the boiler &amp; machineries to ensure at optimum level, to monitor diesel usage, provide training to workers regarding reduce fuel and diesel usage for boiler.</p> <p><u>Estates</u> High usage of fossil fuel for machineries:  <ul style="list-style-type: none"> <li>• to carry out scheduled maintenance for machineries to ensure diesel and lubricant usage is at optimal level and in good condition.</li> <li>• to brief workers during muster briefing on how to reduce diesel usage. Example turn off engine when not in used.</li> <li>• to carry out road maintenance programme as planned to ensure it is always in good condition to ease tractor movement</li> </ul> Skid tank management:  <ul style="list-style-type: none"> <li>• to ensure all equipment for loading and unloading diesel in good condition.</li> <li>• to ensure no spillage and leakage</li> <li>• to ensure nozzle is always locked when not in used to avoid unauthorized diesel filling</li> </ul> </p>			
7.10 Plans to reduce pollution and emissions, including greenhouse gases	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 GHG calculator and	YES	GHG emission has been identified and assessed to the all estates and mill through list of waste, EIA, pollution prevention plan, etc. for year 2019. CU calculated the emission through RSPO Palm GHG calculator version 4 (data as table below). CU also submitted GHG footprint report to the RSPO and RSPO annual communication of progress (ACOP) (publicly available report).			

Clause	Indicators	Comply Yes/No	Findings																																													
(GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	publicly reported.		<b><u>Summary of net GHG emissions from PalmGHG calculator</u></b>																																													
			<b>Summary of Emissions</b>																																													
			<table><tr><th>Description</th><th>tCO<sub>2</sub>e/tProduct</th><th>Extraction Rate</th><th>%</th><th>Production</th><th>t/yr</th></tr><tr><td>CPO</td><td>1.15</td><td>OER</td><td>22.54</td><td>CPO</td><td>30741</td></tr><tr><td>PK</td><td>1.15</td><td>KER</td><td>5.02</td><td>Pk</td><td>6841.7</td></tr></table>	Description	tCO <sub>2</sub> e/tProduct	Extraction Rate	%	Production	t/yr	CPO	1.15	OER	22.54	CPO	30741	PK	1.15	KER	5.02	Pk	6841.7																											
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<table><tr><th rowspan="2">Description</th><th colspan="3">Own</th><th colspan="3">Group</th></tr><tr><th>tCO<sub>2</sub>e</th><th>tCO<sub>2</sub>e/ha</th><th>tCO<sub>2</sub>e/tFFB</th><th>tCO<sub>2</sub>e</th><th>tCO<sub>2</sub>e/ha</th><th>tCO<sub>2</sub>e/tFFB</th></tr><tr><td>Land conversion</td><td>71283.47</td><td>9.48</td><td>0.52</td><td>0</td><td>0</td><td>0</td></tr><tr><td>CO2 emission from fertiliser</td><td>7217.11</td><td>0.96</td><td>0.05</td><td>0</td><td>0</td><td>0</td></tr><tr><td>N2O emission frm fertiliser</td><td>3868.70</td><td>0.51</td><td>0.03</td><td>0</td><td>0</td><td>0</td></tr><tr><td>Fuel consumption</td><td>695.38</td><td>0.09</td><td>0.01</td><td>0</td><td>0</td><td>0</td></tr><tr><td>Peat Oxidation</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr></table>	Description	Own			Group			tCO <sub>2</sub> e	tCO <sub>2</sub> e/ha	tCO <sub>2</sub> e/tFFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ha	tCO <sub>2</sub> e/tFFB	Land conversion	71283.47	9.48	0.52	0	0	0	CO2 emission from fertiliser	7217.11	0.96	0.05	0	0	0	N2O emission frm fertiliser	3868.70	0.51	0.03	0	0	0	Fuel consumption	695.38	0.09	0.01	0	0	0	Peat Oxidation	0	0	0	0	0	0
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Clause	Indicators	Comply Yes/No	Findings						
			Crop sequestration	-67567.25	-8.99	-0.50	0	0	0
			Sequestration in conservation area	0	0	0	0	0	0
			Total	5497.40	2.06	0.11	0	0	0
			Summary of Mill emission and credits						
			Description		tCO2		tCO2e/tFFB		
			POME		26737.49		0.20		
			Fuel Consumption		822.95		0.01		
			Grid Electricity Utilisation		104.36		0.00		
			Export of Excess Electricity to Housing & Grid		0		0		
			Sale of PKS		0		0		
Sale of EFB		0		0					
Total		27664.80		0.20					
Palm Oil Mill Effluent (POME) Treatment									
Diverted to compost		0%							
Diverted to anaerobic digestion		100%							
POME Diverted to Anaerobic Digestion									

Clause	Indicators	Comply Yes/No	Findings																
			Diverted to anaerobic pond	100%															
			Diverted to methane capture (flaring)	0%															
			Diverted to methane capture (electricity generation)	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 through checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at SOU Giram. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.																
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	<b>Remote</b> All the estates had established the <i>Pollution Prevention Plan</i> 2020 among others addressing the following environmental issues; <table><tr><th></th><th>Issues</th><th>Mitigation measures</th></tr><tr><td>1</td><td>Leakage of pesticide during chemical mixing</td><td>to recollect water used at chemical mixing area to be recycled during mixing to construct containment sum at chemical mixing area to contain leakages</td></tr><tr><td>2</td><td>Contaminated ground / soil at workshop area</td><td>to replace tray whenever tractors / machines under repairing progress to avoid oil spillage on the ground periodic checking on oil sump to ensure it is well maintained and to avoid any leakages</td></tr><tr><td>3</td><td>Prohibited spraying at line site</td><td>education to workers not to spray at the line site and explain reason for such a directive. periodic checking at the line site</td></tr><tr><td>4</td><td>Prohibited spraying &amp; fertilizer or chemical near the river (buffer zone)</td><td>provide training and create awareness to workers identifying and marking the buffer zones</td></tr></table> <b>Onsite</b> The significants pollutants in the mill has been identified in the pollution prevention Plan – FY 2020.			Issues	Mitigation measures	1	Leakage of pesticide during chemical mixing	to recollect water used at chemical mixing area to be recycled during mixing to construct containment sum at chemical mixing area to contain leakages	2	Contaminated ground / soil at workshop area	to replace tray whenever tractors / machines under repairing progress to avoid oil spillage on the ground periodic checking on oil sump to ensure it is well maintained and to avoid any leakages	3	Prohibited spraying at line site	education to workers not to spray at the line site and explain reason for such a directive. periodic checking at the line site	4	Prohibited spraying & fertilizer or chemical near the river (buffer zone)	provide training and create awareness to workers identifying and marking the buffer zones
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4	Prohibited spraying & fertilizer or chemical near the river (buffer zone)	provide training and create awareness to workers identifying and marking the buffer zones																	

Clause	Indicators	Comply Yes/No	Findings	
			Environmental issue	Mitigation measures
			To reduce dark smoke emission	-Quarterly stack sampling has been carried out by external bodies -Carry out routine maintenance Install CCTV link direct to DOE
			Waste water discharge through land	-Regularly effluent ditches and its surrounding for leakage. -to conduct clean up all the trap regularly
			Chemical and lubricant spillage	-to ensure used oil and rag in drums are properly stacked and well contained -to clean regularly all the sand and oil trap
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	SOU Giram continued to use Sime Darby Plantation Berhad's policy of no open burning. As advocated, all the 2 estates practised Zero burning. In the 2018, 2019 and 2020 replants visited during the audit in the 2 estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. E.g During site visit at replanting area (block 2020A) Mostyn Estate. There was no burning has been used for replanting activities. All palm has been chipped and left for decomposed.	
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	SOU Giram had established the fire prevention and control measures for the areas under its direct management. Accident and emergency procedures were available in adherence to the Sime Darby Plantation Berhad's policy on ' <i>Crisis Management &amp; Emergency Response</i> ' plan - chapter 13 of PQMS, OSH manual and " <i>Accident and Reporting and Investigation Procedure</i> " in chapter 14 of the same manual. Each estate had a standard procedures for emergencies situation. There was formation of ERP Team & ERP for all the identified incidences. The organization chart for the ERP team was established and displayed for information to the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SQM and amended to tailor to the situation differences in the estates and mills.	
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	Giram SOU has conducted stakeholder meeting on 28/07/2020 and discussed related fire prevention and control measures. Among of the issues has been explained to the stakeholders were: <ul style="list-style-type: none"> <li>• zero burning technique at replanting</li> <li>• hotspot monitoring using satellite</li> <li>• 5km radius zero burning commitment- to help surrounding areas for put out the fires as soon as possible to prevent further damages.</li> <li>• Fire fighting teams</li> </ul>	
7.12 Land clearing does not cause deforestation or damage any area required to protect	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	YES	No new land clearing since Nov 2015 available at SOU Giram, thus this Indicator was not Applicable.	

Clause	Indicators	Comply Yes/No	Findings																												
or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	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.																														
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	Identification and assessment of HCV habitats and protected areas within landholdings; and attempt assessments of HCV habitats and protected areas surrounding landholdings was conducted on 2-27/07/2013, 27-30/08/2013, and 2-7/09/2013. A report titled 'HCV Re-Assessment for Strategic Operating Unit (SOU) Sabah Central – South Zone – Jan 2014 (Version II)' was verified. The assessment had covered all the High Conservation Value (HCV) within and adjacent to their estates. The SOU Giram had identified the significant HCV as reported in the assessment report as below: <table><tr><th>Estate</th><th>No.</th><th>Assessment Area</th><th>HCV</th><th>Area (Ha)</th></tr><tr><td rowspan="2">Giram Estate</td><td>1</td><td>Unplantable (&gt;25° slopes)</td><td>4.2</td><td>48.77</td></tr><tr><td>2</td><td>Water catchment</td><td>4.1</td><td>0.63</td></tr><tr><td rowspan="2">Mostyn Estate</td><td>1</td><td>Unplantable (&gt;25° slopes)</td><td>4.2</td><td>10.10</td></tr><tr><td>2</td><td>Water catchment</td><td>4.1</td><td>29.89</td></tr><tr><td colspan="4">Total</td><td>89.39</td></tr></table>	Estate	No.	Assessment Area	HCV	Area (Ha)	Giram Estate	1	Unplantable (>25° slopes)	4.2	48.77	2	Water catchment	4.1	0.63	Mostyn Estate	1	Unplantable (>25° slopes)	4.2	10.10	2	Water catchment	4.1	29.89	Total				89.39
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	2	Water catchment	4.1	29.89																											
Total				89.39																											
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.																															
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 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	YES	There was no RTE observed present in the SOU in the assessment. The CU had a regular programmes to educate its employees pertaining to the protection of the RTE as well as the protection of buffer zone. The CU has conducted a regular patrol of HCV areas, access and boundary of estates. Signage, such as “No Hunting”, “No Fishing”, “Buffer Zone” were available. No use of chemicals observed been applied in the buffer zone as prohibited by the CU. In general, the action plan has been implemented accordingly. Detailed of action plan concerning HCV contained in the “Biodiversity Management Programme for Financial Year 2019”. Action Plan was updated on 2/1/20 on Mostyn Estate, and Giram Estate Action Plan HCV has been updated on 17/1/20																													

Clause	Indicators	Comply Yes/No	Findings
	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).		
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 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	HCV Re Assessment has been done on April 2014, but no rights of local communities have been identified in HCV areas. Thus this indicator was not applicable.
	7.12.6 All rare, threatened or endangered (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	<p>The CU has regularly educated its employees via morning muster briefing about the need to protect the RTE species. Appropriate disciplinary measures will be taken if found violated. Information pertaining RTE and relevant CU policies were displayed at the morning muster station.</p> <p>Auditor has verified HCV training record dated 13/3/2020 titled 'Taklimat HCV' which was conducted for Mostyn Estate and HCV Training for Giram Estate on 3/3/20.</p>

Clause	Indicators	Comply Yes/No	Findings
	<p>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.</p> <p><u>AUDITORS' GUIDE:</u>  <u>Reviewing HCV Management Plan</u>  a) Review the plan.  b) Review the appropriateness of the action taken identified to address the issue in the plan.  c) Look into the monitoring of the action taken and the effectiveness of the implementation of the action plan.  d) Update the management plan in accordance with the monitoring and implementation evaluation outcome.  e) Provided overall conclusion for the management plan established by the CH.</p>	YES	<p>The CU had continued to monitor its HCV areas and presence of RTE. During the field audit, there was no presence of RTE in the areas found and the monitoring records also confirmed that no significant outcomes detected. On-going monitoring of the HCV area at Mostyn Estate and Giram Estate was conducted accordingly.</p> <p><u>Mostyn Estate</u>  Auditor has verified the latest HCV monitoring activity for Water Catchment as recorded in the 'HCV Monitoring' book dated 13/8/20, 3/8/20, 25/7/20, 21/7/20, 21/6/20, 5/6/20 etc.</p> <p><u>Giram Estate</u>  Auditor has verified the latest HCV monitoring activity for remnant forest patch and water catchment as recorded in the AP Book dated 9/7/20, 15/6/20, 4/5/20 (Bukit Tiger), 3/8/20, 2/8/20, 28/7/20, 19/7/20, 16/7/20, 14/7/20, 12/7/20, 6/7/20, 5/7/20 (Water Catchment), and also book monitoring for elephant, sighted monitoring has been done on 21/5/19, 17/4/19, 23/3/19 and 15/2/19, there is no new traces of elephant except old traces.</p>
	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	Not applicable since there is no new land clearing

## RSPO Certifications Systems for Principles & Criteria June 2017

Clause	Indicators		Comply Yes/No	Findings
<p>4.5.3 Time-bound plan</p> <p>Note: Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;</p>	(a)	<p>As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.</p>	YES	<p>SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.</p> <p><b>Indonesia</b>  <b>PT Bahari Gembira Ria</b>  Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate &amp; Report for PT BGR - <a href="https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioYJEAZ">https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioYJEAZ</a>  <b>PT Sandika Natapalma &amp; PT Budidaya Agro Lestari</b>  Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing. 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.  <b>PT Bersama Sejahtera Sakti</b>  The new project at KKPA Maju Bersama by the plasma community is currently in nursery stage and not yet due for harvesting, the year of planting was in 2014.  <b>PT Ladang Rumpun Subu Rubadi</b>  SAP 1 Estate PLASMA will be undergone 2<sup>nd</sup> stage audit on 2019.  <b>PT Guthrie Pecconina</b>  Sungai Jernih Estate and the KKPA Estates has undergone audit.  <b>PT Sime Indo Agro</b>  Only East estate not yet certified – land legalization still in progress.</p> <p><b>Liberia</b>  As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI).</p> <p><b>Papua New Guinea (NBPOL)</b>  Markham Farming Company Limited (MFCL) / Markham Agro Pte. Ltd. Estimate to be certified on year 2020. The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore, the Remediation and Compensation Procedure will be required to</p>

				<p>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.</p> <p><a href="https://rspo.org/certification/remediation-and-compensation/racp-tracker">https://rspo.org/certification/remediation-and-compensation/racp-tracker</a> no 82</p>
	(b)	<p>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;</p>	YES	<p>Time bound plan was reviewed by CB and it can be confirmed that there were several changes to the current time bound plan as verified during this audit. Update as in (a).</p>
	(c)	<p>Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly</p>	YES	<p>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. Update as in (a). Latest reviosin of the TBP as at Attachment 6 of this report.</p>

		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 1 <sup>st</sup> January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	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. <a href="https://rspo.org/certification/remediation-and-compensation/racp-tracker">https://rspo.org/certification/remediation-and-compensation/racp-tracker</a> no 82
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6;	YES	Regular discussion was ongoing between Sime Darby Plantation and the group of community (PAC) through bi-monthly Tim Kerja Perwakilan Petani (TKPP) meeting since November 2012. In October 2013, representatives from two of nine villages (Kerunang and Entapang) left TKPP. These two villagers are supported by and working with TuK and OXFAM. They have then requested SDP to enter into Dispute Settlement Facility (DSF) in June 2014. Hence, there were two groups of communities: The TKPP (7 of 9 villages) and the Kerunang & Entapang team (2 of 9 villages). 21 TKPP meetings have been conducted. The most recent one was held on 2/11/2016. Issues related to the 14 demands made by TKPP were closed except for two. As per current status (23/01/2019) SDP and affected parties will be resolved all the issues to proceed with legal review. <a href="https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail">https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail</a> However, sighted as at June 2019 PT Mitra Austral Sejahtera has been sold to PT Inti Nusa Sejahtera. Refer letter from Sime dated 27 June 2019 to RSPO Secretariat.
	(c)	Labour disputes, if any, are being resolved through a	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.

		mutually agreed process, in accordance with RSPO P&C criterion 6.3;													
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	Based on internal and external audit (ISPO certified) there was no 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	SDP PT Mitral Austral Sejahtera already ISPO certified by MUTU Certification International on 30/11/2017 and there was no issue on legal non-compliance for all uncertified unit. However, it has been noted that as at June 2019, PT Mitra Austral Sejahtera was sold to PT Inti Nusa Sejahtera. Refer letter from Sime dated 27 June 2019 to RSPO Secretariat.											
		<ul style="list-style-type: none"><li>A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-</li></ul>	YES	<table><tr><th>#</th><th>Name of SOU</th><th>Name of Units</th><th>Positive assurance statement and self-assessment</th></tr><tr><td>1</td><td>PT Sime Indo Agro</td><td>East Sei Mawang</td><td>Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor</td></tr></table>				#	Name of SOU	Name of Units	Positive assurance statement and self-assessment	1	PT Sime Indo Agro	East Sei Mawang	Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor
#	Name of SOU	Name of Units	Positive assurance statement and self-assessment												
1	PT Sime Indo Agro	East Sei Mawang	Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor												

		assessment against each requirement;		2	PT Ladang Rumpun Subur abadi	Subur Abadi Plasma 1	Internal assessment has been conducted for Subur Abadi Plasma 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.
				3	PT Bersama Sejahtera Sakti	KKPA BSS	New smallholder project currently under preparation to undergo RSPO Certification by 2019, internal audit for PT BSS has been undertaken, the latest internal audit has been conducted on 21/4/2018.
				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 - <a href="https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioYJEAZ">https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioYJEAZ</a> <a href="https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioXQEAZ">https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioXQEAZ</a>
				5	PT Guthrie Pecconina Indonesia	Sungai Jernih Estate and GPI KKPA	Sungai Jernih Estate and GPI KKPA were audited by Mutuagung as verified through Recertification Audit report. The assessment was conducted on 15 – 20/5/2017.
				6	PT Sandika Nata Palma	Karya Palma KKPA SNP	Internal assessment was conducted on 10/2/2017.
				7	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Sungai Putih (PT 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.

				<table><tr><td></td><td>Beturus (PT BAL)</td><td></td></tr><tr><td>KKPA BAL</td><td>Smallholder project – targeted for certification by 2020.</td></tr></table>		Beturus (PT BAL)		KKPA BAL	Smallholder project – targeted for certification by 2020.
		Beturus (PT BAL)							
	KKPA BAL	Smallholder project – targeted for certification by 2020.							
		<ul style="list-style-type: none"><li>Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.</li></ul>	YES	PT Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report.					
	<ul style="list-style-type: none"><li>Desktop study e.g. web check on relevant complaints</li></ul>	YES	It was evident that in handling uncertified management unit, SDP engaged with TuK-Indonesia and continued to work on direct engagement with PAC in order to achieve the consensus with the PAC to address all unresolved issues.						
	<ul style="list-style-type: none"><li>If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.</li></ul>	YES	Further information can be obtained from <a href="https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail">https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail</a> . However, as at June 2019 PT Mitra Austral Sejahtera has been sold to PT Inti Nusa Sejahtera. Refer letter from Sime dated 27 June 2019 to RSPO Secretariat.						
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		No additional indicators <b><u>AUDITORS' GUIDE:</u></b> <b><i>1. Identify (and document) the identification of the previous users and owners of the land;</i></b> <b><i>2. Identify (i.e., locate a written copy of) the agreements/promises made at the time of the relevant land transfers and/or land use agreements;</i></b> <b><i>3. Determine whether the previous users/owners can now be contacted, and do so, as applicable:</i></b>	YES	As it has been mentioned in 4.4.1 of this checklists, it has been verified that the land is now legitimately owned by SOU Giram since 1984-1992. 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.					

their free, prior and informed consent and check compliance with the specific terms of such agreements.		<b>4. Interview the previous owners/users to assess whether the land transfer and land use agreements were entered into with their free, prior, informed consent;</b> <b>5. Evaluate whether there is ongoing compliance with the agreements (e.g., if promises were made at the original transfer date, to transfer developed land back to communities at a later date, were these promises kept in full?);</b> <b>6. Identify and follow up any disputes.</b>		
<p>Note:</p> <p>1. For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&amp;C. For example, if an NC against a major indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless that is actively addressed;</p> <p>2. Failure to address any outstanding NC within uncertified unit(s) regarding 4.5.4 (a)-(d) may lead to certificate suspension(s) to the certified unit(s), in accordance with the provisions of these Certification Systems.</p>				

## Details of Non-conformities and Corrective Actions Taken

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
2.1.1 RAR 01 2020/ MAR 04 2020	Major	<b>Findings:</b> 1. Occupational Safety & Health (USECHH) Regulation 2000 was not complied with. 2. Unit of certification does not comply with applicable legal requirements i.e Workers Minimum Housing Act 1990 Section 23 (B) <b>Objective evidence :</b> 1. Recommendation made by CHRA assessor for Water treatment plant (Table D3) to install emergency shower was not complied with. 2. Giram Estate does not comply with Workers Minimum Housing Act 1990 Section 23 (B), linesite inspection did not done weekly which last conducted on 7/2/2020 (Taman Seroja) and at Ulu Balung Div the monsoon drain was found clogged with stagnant water and smelly.	<b>Root cause:</b> 1. CHRA has been completed by the assessor, however, the final presentation has yet to be conducted due to MCO period. Estate was awaiting to discuss the outcome of final presentation before install emergency shower at water treatment plant. 2. Ineffectiveness of weekly housing inspection and inadequate record keeping by Hospital Assistant <b>Corrective action:</b> 1. Final presentation by CHRA Assessor has been carried out via online on 21/09/2020 and management has take action based on outcome of discussion i.e. to install emergency shower at water treatment plant. 2. Assistant Manager has remind the Hospital Asisstant and other Person in Charge to conduct effective monitoring of workers housing complex including each block. Clogged drain at Ulu Balung Division has been cleared and regularly maintained.	1. Auditor has received copy of the picture of emergency installation at water treatment plant. 2. Auditor has received copy of weekly housing inspection at Taman Seroja (Giram Estate) and copy of picture monsson drain has been cleaned up.  <b>Status: CLOSED</b>
3.4.3 MZX 01 2020/ MAR 01 2020	Major	<b>Findings:</b> 1. Social management and monitoring plans have not implemented, reviewed and updated in a participatory way. <b>Objective evidence:</b> 1. For Mostyn Estate, The SIA management and monitoring plans have not implemented and reviewed in a participatory way to update the issue: - Kg Simpang Ampat: issues regarding Land Survey at Lur Malung Land	<b>Root cause:</b> 1. The estate management have conducted stakeholder meeting with nearby community on 3 July 2020. However, some of the village representative did not mention about the issues during the meeting. There was also village representative who did not attend the meeting. Estate management acknowledge that due to high number of attendees	1. Auditor has received minute of stakeholder meeting held on 18/9/2020 – Meeting with representative from Kg Mostyn Lama & Kg Seri Bahagia 4/11/2020 – Meeting with representative from Kg. Simpang Empat, Kg. Selamat & Kg Sg Langgar. Also received updated Social Acton Plan dated 2. Auditor has received Social Action Plan dated regarding stray dogs.

		<ul style="list-style-type: none"> <li>- Kg Seri Bahagia: issues regarding Village main road.</li> <li>- Kg Mostyn Lama : issues regarding request of water from KGTI to villagers which is villagers willing to pay</li> </ul> <p>The SIA also did not updated issues:</p> <ul style="list-style-type: none"> <li>- Kg Selamat: regarding Land Title</li> </ul> <p>2. Based on SIA action plan at GIRAM Mill and GIRAM Estate, the issues of stray dogs was not updated in participatory way.</p>	<p>including from government agencies and other stakeholders, this might cause the village representatives feel insecure to voice out their concerns.</p> <p>2. The issue was not captured in the Social Impact Assessment Action Plan as management have considered it as a minor issue. A follow up action was taken by informing Majlis Daerah Kunak regarding stray dog problem however it was not updated in the SIA Action Plan as this issue was not captured in the action plan.</p> <p><b>Corrective action:</b></p> <p>1. Estate management has identified and conduct a targeted meeting with each village representative to allow more room for discussion and issues that requires action plan will be updated in the estates Social Impact Assessment Action Plan. The date of meeting is as per below: 18/9/2020 – Meeting with representative from Kg Mostyn Lama &amp; Kg Seri Bahagia 4/11/2020 – Meeting with representative from Kg. Simpang Empat, Kg. Selamat &amp; Kg Sg Langgar.</p> <p>2. Giram Estate management has captured the stray dog issue in the SIA Action Plan and has review effectiveness of action taken on a quarterly basis.</p>	<p><b>Status: CLOSED</b></p>
3.7.1 MAR 02 2020	Major	<p><b>Finding:</b> There were no evidence assessments of training was conducted at GIRAM Mill and GIRAM Estate.</p> <p><b>Objective evidence:</b> Based on training sampled dated 18/8/2020 at GIRAM Mill, 7/8/2020, 10/2/2020 at GIRAM Estate and 13/3/2020 at Mostyn Estate, it was found that no assessment of training was conducted to the employee, in a form they understand.</p>	<p><b>Root cause:</b> Management have conducted assessment of training verbally at the end of each training and it was not properly recorded or using a standard form.</p> <p><b>Corrective action:</b> Management has assessed effectiveness of training conducted using a standard issue form. The standard form was attached for the training dated 18/8/2020 at GIRAM Mill, 7/8/2020, 10/2/2020 at Giram</p>	<p>Auditor has received the standard form attached for the training dated 18/8/2020 at GIRAM Mill, 7/8/2020, 10/2/2020 at Giram Estate and 13/3/2020 at Mostyn Estate.</p> <p><b>Status: CLOSED</b></p>

			Estate and 13/3/2020 at Mostyn Estate.	
6.1.5 MAR 03 2020	Major	<p><b>Finding:</b> The employees were not aware on the opportunities and improvements for women.</p> <p><b>Objective evidence:</b> Based on interview held with 2 female employees at GIRAM Estate, none of them were aware on the gender committee and awareness on opportunities and improvements for women.</p>	<p><b>Root cause:</b> Briefing on Gender Committee has been regularly conducted to emphasize on opportunity and improvement for women however it was not effective as some workers did not fully understand the contents.</p> <p><b>Corrective action:</b> Giram Estate has improvise contents of briefing and ensure it is more understandable. A refresher briefing on roles and responsibilities of gender committee has been conducted to all workers on 22 November 2020.</p>	<p>Auditor has received refresher briefing dated 22 November 2020 held at GIRAM Estate.</p> <p><b>Status: CLOSED</b></p>
2.1.3 RAR 02 2020	Minor	<p><b>Finding:</b> Legal authorized boundaries were not clearly demarcated and visibly maintained.</p> <p><b>Objective evidence:</b></p> <ul style="list-style-type: none"> <li>• At Giram Estate (Ulu Balung Division) boundaries between estate and Ulu Kalumpang Reserve Forest was not clearly demarcated and maintained.</li> <li>• At Mostyn Estate boundaries between smallholder at Block 09B was not clearly demarcated and maintained.</li> </ul>	<p><b>Root cause:</b> Giram Estate The boundary stones are available and well aware by both parties but was not clearly demarcated and maintained. Mostyn Estate The boundaries between smallholder and estate along Field 2009B have mutual understanding between both parties. For long period of time, there is no issue regarding trespassing due to the boundary is divided by the road. From the estate management view, the road itself is enough to be the boundaries for these areas.</p> <p><b>Corrective action plan:</b> Restore all boundaries marker to improve visibilities. Estate management will conduct a meeting with the smallholder to discuss about the suitable marking as the clear demarcation for the area. Once agreed by both parties, estate and the smallholder will install the agreed marking.</p>	<p>Corrective action plan accepted.</p> <p><b>Status: OPEN</b> <b>The effectiveness of the corrective action plan will verify during next audit.</b></p>

3.3.2 RAR 03 2020	Minor	<p><b>Finding:</b> The procedure mentioned as follows was not effectively implemented.</p> <ul style="list-style-type: none"> <li>Operational Control Procedure, - Title Personal Protective Equipment, Document no : SD/SDP/PSQM(ESH)/201-OS16.</li> <li>SOP EQMS- HIRARDC Procedure- no 7.3 - Risk assessments (b) probability of an occurrence</li> </ul> <p><b>Objective evidence:</b></p> <ul style="list-style-type: none"> <li>During interview at Giram Estate (Ulu Balung Division) with general workers. PPE (rubber bot) has been provided to them once only and also no record of PPE issuance record for all of them.</li> <li>Risk assessments for activities Harvesting – walking palm to palm - Probability of an occurrence value has not been increase to value 4 for repeated case (more than 1 case in 3 years)</li> </ul>	<p><b>Root caused:</b> Less monitoring of PPE issuance to workers</p> <p><b>Corrective action plan:</b></p> <ol style="list-style-type: none"> <li>Management will inform all workers on PPE issuance and replacement procedure and remind store clerk to keep record of PPE issuance accordingly.</li> <li>To review the risk assessment for the said incident and conduct refresher training to the PIC.</li> </ol>	<p>Corrective action plan accepted.</p> <p><b>Status: OPEN</b> The effectiveness of the corrective action will verify during next audit.</p>
4.3.1 MZK 04 2020	Minor	<p><b>Finding:</b> Contributions to community was not based on the results of consultation with local communities.</p> <p><b>Objective evidence:</b> Mostyn Estate: there are records of CSR to the school and government agencies, however, during interviewed with local communities surrounding the Estate from Kg Sri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Mostyn Lama and Kg Selamat there are no explanations to them regarding Contributions to community development.</p>	<p><b>Root caused:</b> The estate management has consulted the previous village representatives (Pengerusi JKKK) regarding the estate CSR contribution for surrounding community. However, there have been change in village committee members and therefore estate management did not conduct meeting with newly appointed committee to discuss the contributions required.</p> <p><b>Corrective action plan:</b> Estate management has identified and conduct a targeted meeting with each village representative to discuss contributions required. The meeting was as follows: 18/9/2020 – Meeting with representative from Kg Mostyn Lama &amp; Kg Seri Bahagia 4/11/2020 – Meeting with representative from Kg. Simpang Empat, Kg. Selamat &amp; Kg Sg Langgar</p>	<p>Auditor has received minute of stakeholder meeting dated 18/9/2020 – Meeting with representative from Kg Mostyn Lama &amp; Kg Seri Bahagia 4/11/2020 – Meeting with representative from Kg. Simpang Empat, Kg. Selamat &amp; Kg Sg Langgar.</p> <p><b>Status: OPEN</b> <b>The effectiveness of the corrective action plan will verify during next audit.</b></p>

**STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED**

<b>P &amp; C Indicator/SCCS Indicator</b>	<b>Specification Major/Minor</b>	<b>Detail Non-conformances</b>	<b>Verification by Auditor</b>
<u>Module D</u> <u>Identity</u> <u>Preserved</u> Indicator: D.4.2 NCR MZK 02 2019	Major	Finding : There was projected overproduction of certified tonnage. Objective evidence : Sighted that overproduction Projected CSPO IP for period May 2018 – April 2019 which is projected 30,384.06 mt and actual produce is 31,236.24 Conventional and Giram POM yet to inform the CB and apply extension to the RSPO.	Auditor has verified the email request to the CB for extension volume from SOU Giram to CB on 20/06/2019 and RSPO has approved the Request on 25/06/2019. Auditor also has verify the monitoring form name Projected and Actual FFB Received and RSPO CPO Production and data for period May 2019 – April 2020 has been start to monitored by the Mill.  For current Recertification Audit, extension of volume has been made and approved by RSPO on 11/8/2020 with the volume of CPO amounting 17,359 mt and PK amounting 3990 mt. No overproduction sighted.  <b>Status : Closed</b>
4.1.3 NCR RAR 01 2019	Minor	Finding : First aid kits and emergency equipment were not consistently monitored Objective evidence : • It was found that the harvesting mandore in field 14A of Langgas Division of Mostyn Estate and the maintenance mandore in field 18 G of Ulu Balung Division of Giram Estate do not have any 1st Aid Kit boxes with them when supervising the workers. • At Mostyn Estate (Creche) fire extinguisher was expired on 28/03/2018.	During site visit at Giram creche, it was found that Fire Extinguisher was available with the availability of Bomba Certificate.  During site visit at field it was found that first aid kit was available and keep by mandore. Interviewed has been made, as a result workers and mandore understand they have to bring the first aid kit during working hours and training on first aid kit also has been made.  <b>Status : Closed</b>

## SIME DARBY PLANTATION TIMEBOUND PLAN AS AT JAN 2020

## SDP - RSPO Certification for Time Bound Plan - Malaysia Operations

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
1	Sg. Dingin	Sungai Dingin Oil Mill	-	Karangan, Kedah	Certified	12-Aug-11	
		Anak Kulim Estate	-		Certified		
		Sungai Dingin Estate	-		Certified		
		Somme Estate	-		Certified		
		Bukit Selarong Estate	-		Certified		
		Padang Buluh Estate	-		Certified		
		Bukit Hijau Estate	-		Certified		
		Jentayu Estate	-		Certified		
2	Chersonese	Chersonese Oil Mill	-	Kuala Kurau, Perak	Certified	5-Oct-11	
		Chersonese Estate	-		Certified		
		Kalumpang Estate	-		Certified		
		Tali Ayer Estate	-		Certified		
		Holyrood Estate	-		Certified		
3	Elphil	Elphil Oil Mill	-	Sg Siput, Perak	Certified	18-Jun-11	
		Kamuning Estate	-		Certified		
		Elphil Estate	-		Certified		
		Kinta Kellas Estate	-		Certified		

4	Flemington	Flemington Oil Mill	-	Teluk Intan, Perak	Certified	5-Oct-11	
		Flemington Estate	-		Certified		
		Bagan Datoh Estate	-		Certified		
		Sabak Bernam Estate	-		Certified		
		Sg. Samak Estate	-		Certified		
5	Seri Intan/Selaba	Seri Intan Oil Mill	-	Teluk Intan, Perak	Certified	3-Mar-11	
		Selaba Oil Mill	-		Certified		
		Seri Intan (+ Selaba) Estate	-		Certified		
		Sabrang Estate	-		Certified		
		Sogomana Estate	-		Certified		
		Sg. Wangi Estate	-		Certified		
		Bikam Estate	-		Certified		
		Cluny (+ Bedford) Estate	-		Certified		
6	Tennamaram	Tennamaram Oil Mill	-	Bestari Jaya, Selangor	Certified	3-Mar-11	
		Tennamaram Estate	-		Certified		
		Sungai Buluh Estate	-		Certified		
		Bukit Talang Estate	-		Certified		
7	Bkt Kerayong	Bukit Kerayong Oil Mill	-	Kapar, Selangor	Certified	15-Apr-11	
		Bukit Kerayong Estate	-		Certified		
		Bukit Cheraka Estate	-		Certified		
		Elmina Estate	-		Certified		

8	East	East Oil Mill	-	Carey Island, Selangor	Certified	19-May-10	
		East Estate	-		Certified		
		Sepang Estate					
		Dusun Durian Estate	-		Certified		
9	West	West Oil Mill	-	Carey Island, Selangor	Certified	19-May-10	
		West Estate	-		Certified		
10	Bukit Puteri	Bukit Puteri Oil Mill	-	Raub, Pahang	Certified	7-Jul-11	
		Bukit Puteri Estate	-		Certified		
11	Kerdau	Kerdau Oil Mill	-	Temerloh, Pahang	Certified	7-Jul-11	
		Kerdau Estate	-		Certified		
		Jentar Estate	-		Certified		
		Mentakab Estate	-		Certified		

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
		Chenor Estate	-		Certified		
		Sg Mai Estate	-		Certified		
12	Jabor	Jabor Oil Mill	-	Kuantan, Pahang	Certified	7-Jul-11	
		Jabor Estate	-		Certified		
13	Labu	Labu Oil Mill	-	Nilai, Negeri Sembilan	Certified	30-Dec-11	New Labu Estate has become a division of Labu Estate.
		Labu Estate	-		Certified		
14	Tanah Merah	Tanah Merah Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	19-May-10	
		Tanah Merah Estate	-		Certified		

		Bukit Pelandok Estate	-		Certified		
15	Sua Betong	Sua Betong Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	18-Feb-14	Siliao Estate has now been merged into Salak Estate and Bradwall Estate. Siliao Estate has now been merged into Salak Estate and Bradwall Estate.
		Sua Betong Estate	-		Certified		
		Sengkang Estate	-		Certified		
		Bradwall Estate	-		Certified		
		PD Lukut Estate	-		Certified		
		Tampin Linggi Estate	-		Certified		
		Sg. Bahru Estate	-		Certified		
		Salak Estate	-		Certified		
16	Kok Foh	Kok Foh Oil Mill	-	Bahau, Negeri Sembilan	Certified	7-Jul-11	
		Muar River Estate	-		Certified		
		Sg. Senarut Estate	-		Certified		
		Sg. Gemas Estate	-		Certified		
		Kok Foh Estate	-		Certified		
		Bukit Pilah Estate	-		Certified		
		St. Helier Estate	-		Certified		
		Sungai Sabaling Estate	-		Certified		
		Pertang Estate	-		Certified		
17	Kempas	Kempas Oil Mill	-	Jasin, Melaka	Certified	19-May-10	
		Kempas Estate	-		Certified		
		Tangkah Estate	-		Certified		
		Kemuning Estate	-		Certified		

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

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
22	Bukit Benut	Bukit Benut Estate	-	Kluang, Johor	Certified	5-Oct-11	* SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2018.
		Bukit Benut Oil Mill	-		Certified		
		Lambak Elaeis Estate	-		Certified		
		CEP Nyior Estate	-		Certified		
23	Ulu Remis	Ulu Remis Oil Mill	-	Layang-layang, Johor	Certified	11-Apr-11	
		Ulu Remis Estate	-		Certified		
		Cenas Estate	-		Certified		
		Bukit Badak Estate	-		Certified		
		Tun Dr. Ismail Estate	-		Certified		
		Pekan Estate	-		Certified		
		Sembrong Estate	-		Certified		
24	Hadapan	Hadapan Oil Mill	-	Layang-layang, Johor	Certified	29-Mar-11	
		Sri Pulau Estate	-		Certified		
		Kulai Estate	-		Certified		
		Layang Estate	-		Certified		
		CEP Renggam Estate	-		Certified		
26	Sandakan Bay	Sandakan Bay	-	Sandakan, Sabah	Certified	1-Oct-08	
		Tun Tan Siew Sin	-		Certified		
		Tunku Estate	-		Certified		
		Tigowis Estate	-		Certified		
		Sentosa Estate	-		Certified		
		Segaliud Estate	-		Certified		

27	Melalap	Melalap Oil Mill	-	Tenom, Sabah	Certified	21-Jan-11	
		Melalap Estate	-		Certified		
		Sapong Estate	-		Certified		
28	Binuang	Binuang Oil Mill	-	Kunak, Sabah	Certified	16-Jan-09	
		Binuang Estate	-		Certified		
		Sungang Estate	-		Certified		
		Tingkayu Estate	-		Certified		
		Jeleta Bumi Estate	-		Certified		
29	Giram	Giram Oil Mill	-	Kunak Sabah	Certified	16-Jan-09	
		Giram Estate	-		Certified		
		Mostyn Estate	-		Certified		
30	Merotai	Merotai Oil Mill	-	Tawau, Sabah	Certified	16-Jan-09	
		Merotai Estate	-		Certified		
		Imam Estate	-		Certified		
		Tiger Estate	-		Certified		
		Table Estate	-		Certified		
31	Lavang	Lavang Oil Mill	-	Bintulu, Sarawak	Certified	30-Dec-11	
		Lavang Estate	-		Certified		
		Rasan Estate	-		Certified		
		Belian Estate	-		Certified		
		Kelida Estate	-		Certified		
		Lavang (Special) Estate	-		Certified		
		Pekaka Estate	-		Certified		
		Ruai Estate	-		Certified		

		Dulang Estate	-		Certified		
		Charquest Estate	-		Certified		
		Paroh Estate	-		Certified		
32	Rajawali	Rajawali Oil Mill	-	Bintulu, Sarawak	Certified	30-Dec-11	
		Rajawali Estate	-		Certified		
		Samudera Estate	-		Certified		
		Semarak Estate	-		Certified		
		Bayu Estate	-		Certified		
33	Derawan	Derawan Oil Mill	-	Bintulu, Sarawak	Certified	30-Dec-11	
		Derawan Estate	-		Certified		
		Sahua Estate	-		Certified		
		Takau Estate	-		Certified		
		Damai Estate	-		Certified		
34	Pekaka	Pekaka Mill	-	Bintulu, Sarawak	Withdrawn	NA	Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang.
35	Bintang	Bintang Oil Mill	-	Johor	NA	NA	* SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1st Oct 2018, the mill has completed the selling off transaction.

Legends

NA - NOT APPLICABLE

**SIME DARBY PLANTATION - RSPO Certification for Time Bound Plan - Indonesia Operation**

No	Management Unit	Mill and Supply Base	Time Bound Plan	Latest Internal / External Audit Date	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name							
1	PT Lahan Tani Sakti	Alur Dumai Mill	-		Rokan Hilir District – Riau	Certified	16-Jan-12	
		Alur Dumai Estate	-			Certified		
2	PT Sajang Heulang	Mustika Mill	-		Tanah Bumbu District – South Kalimantan	Certified	3-Jul-13	
		Mustika Estate	-			Certified		
		KKPA-2 PT.SHE Estate	-			Certified		
		KKPA-3 PT.SHE Estate	-			Certified		
		KKPA-5 PT.SHE Estate	-			Certified		
3	PT Ladangrumpun Suburabadi	Angsana Mill	-		Tanah Bumbu District – South Kalimantan	Certified	6-Jul-11	PT LSI Plasma has been audited by the Certification Body in 2017. The identified legal issue on HGU is being address.
		Angsana Estate	-			Certified		
		Pantai Bonati Estate	-			Certified		
		Gunung Sari Estate	-			Certified		
		Subur Abadi Plasma 1 Estate	2020	Jul-19		Stage Two		
		KKPA-1 PT.SHE Estate	-			Certified	6-Jul-11	
		KKPA-4 PT.SHE Estate	-			Certified		

4	PT Langgeng Muaramakmur	Bebunga Mill	-		Kotabaru District – South Kalimantan	Certified	16-Mar-12	Previously KKPA Sg. Cengal. Sime Darby Plantation does not have management control over the plasma scheme.
		Bebunga Estate	-			Certified		
		Sungai Cengal Estate	-			Certified		
		Bakau Estate	-			Certified		
		KKPA LMR	2020			-		
5	PT Kridatama Lancar	Sukamandang Mill	-		Seruyan and East Kotawaringin District – Central Kalimantan	Certified	5-Jul-11	
		Sukamandang Estate	-			Certified		
		Sapiri Estate	-			Certified		
		Barasdanum Estate	-			Certified		
		Kuala Kuayan Estate	-			Certified		
6	PT Bahari Gembira Ria	Ladang Panjang Mill	-		Muaro Jambi District - Jambi	Certified	9-Jul-12	Only Division 3 (1200ha) was certified . Division 1 & 2 with 1792 Ha received HGU recently. The unit is getting ready for certification. Plan for certification in 2020.Total Ladang Panjang Estate is 2992 ha.  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.
		Ladang Panjang Estate	-			Certified	9-Jul-12	
		Plasma BGR Estate	2020	Nov-19		-		

7	PT Tunggal Mitra Plantations	Manggala Mill	-		Rokan Hilir District – Riau	Certified	25-Nov-10	-
		Manggala 1 Estate	-			Certified		
		Manggala 2 Estate	-			Certified		
		Manggala 3 Estate	-			Certified		
8	PT Paripurna Swakarsa	Pondok Labu Mill	-		Kotabaru District – South Kalimantan	Certified	16-Mar-12	
		Pondok Labu Estate	-			Certified		
		Binturung Estate	-			Certified		
		Rampa Estate	-			Certified		
		Sesulung Estate	-			Certified		
9	PT Bersama Sejahtera Sakti	Gunung Aru Mill	-		Kotabaru District – South Kalimantan	Certified	5-Jul-11	
		Gunung Aru Estate	-			Certified		
		Gunung Kemas Estate	-			Certified		
		Laut Timur Estate	-			Certified		
		Pantai Timur Estate	-			Certified		
		KKPA MBP	2020	Dec-19		-		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. Internal Audit for 2019 is planned in Dec 2019.
10	PT Guthrie Pecconina	Rantau Panjang Mill	-		Musi Banyuasin District – South Sumatera	Certified	16-Mar-12	Remarks: Land legalisation process for 4152.70 ha is still in process.
		Rantau Panjang Estate	-			Certified		
		Bumi Ayu Estate	-			Certified		
		Karang Ringin Estate	-			Certified		
		Napal Estate	-			Certified		
		Mangun Jaya Estate	-			Certified		

		Sungai Jernih Estate and GPI KKPA Estate	2020	Oct-19		-		Sungai Jernih Estate and the KKPA Estates(1-5) has undergone audit. Land legalisation process is still in process.
11	PT Laguna Mandiri	Rantau Mill	-		Kotabaru District – South Kalimantan	Certified	30-Dec-11	
		Rantau Estate	-			Certified		
		Matalok Estate	-			Certified		
		Betung Mill	-			Certified	1-Apr-14	
		Betung Estate	-			Certified		
		Sekayu Estate	-			Certified		
12	PT Indotruba Tengah	Sekunyir Mill	-		Seruyan and West Kotawaringin District – Central Kalimantan	Certified	23-Nov-10	
		Sekunyir	-			Certified		
		Seruyan Estate	-			Certified		
13	PT Swadaya Andika	Selabak Mill	-		Kotabaru District – South Kalimantan	Certified	16-Mar-12	Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification.
		Selabak Estate	-			Certified		
		Randi Estate	-			Certified		
		Sangkoh Estate	-			Certified		
		Lanting Estate				Certified		
14	PT Bina Sains Cemerlang	Sungai Pinang Mill	-		Musi Rawas District – South Sumatera	Certified	11-Sep-12	Remarks: Land legalisation process for 308.35 ha is still in process.
		Sungai Pinang Estate	-			Certified		
		Bukit Pinang Estate	-			Certified		
15	PT Teguh Sempurna	Pemantang Mill	-		Seruyan and East Kotawaringin District – Central Kalimantan	Certified	5-Jul-11	
		Pemantang Estate	-			Certified		
		Kawan Batu Estate	-			Certified		
		Hatan Tiring Estate	-			Certified		
		Batang Garing Estate	-			Certified		

16	PT Bhumireksa Nusa Sejati	Teluk Bakau Mill	-		Indra Giri Hilir District – Riau	Certified	11-Oct-11		
		Teluk Bakau Estate	-			Certified			
		Nusa Lestari Estate	-			Certified			
		Nusa Perkasa Estate	-			Certified			
		Mandah Mill	-			Certified	1-Apr-14		
		Mandah Estate	-			Certified			
		Rotan Semelur Estate	-			Certified			
17	PT Aneka Intipersada	Teluk Siak Mill	-		Pekanbaru, Siak District – Riau	Certified	11-Oct-11		
		Teluk Siak Estate	-			Certified			
		Pinang Sebatang Estate	-			Certified			
		Aneka Persada Estate	-			Certified			
18	PT Tamaco Graha Krida	Ungkaya Mill	-		Morowali District – Sulawesi Tengah	Certified	10-Jul-12		Perijinan' process is ongoing
		Ungkaya Estate	-			Certified			
		Plasma TGK Estate	-	Mar-20		-			
19	PT SIME Indo Agro	Bukit Ajong Mill	-		Sanggau District –West Kalimantan	Certified	18-Oct-10	Land legalisation process for East Est for 5815.64 ha is still in process.	
		West Estate	-			Certified			
		East Estate	-			Certified			
		East* Estate /Sei Mawang Estate	2020	Jul-19		-		Land legalisation for Sei Mawang is still in process	
		East Plasma Estate	-			Certified	18-Jul-16		
		West Plasma Estate	-			Certified			
20	PT Padang Palma Permai / PT Perkasa Subur Sakti	Blang Simpo Mill	-		Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam	Certified	3-May-13		
		Tamiang (PT PPP) Estate	-			Certified			
		Batang Ara (PT PSK) Estate	-			Certified			
		Blang Simpo-01 Estate	-			Certified			
		Blang Simpo-02 Estate	-			Certified			

21	PT Sandika Natapalma	Lembiru Mill	-		Ketapang District – West Kalimantan	Certified	3-Jul-14	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru Mill.	
		Lembiru Estate	-			Certified			
		Awatan Estate	-			Certified			
		Karya Palma Estate	2020	Jul-19		-			Perijinan' process is ongoing
		KKPA SNP Estate	2020	Jul-19		-			
22	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Estate	-		Ketapang District – West Kalimantan	Certified	3-Jul-19	Perijinan' process is ongoing	
		Sungai Putih (PT BAL) Estate	2020	May-19		-			Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing
		Beturus (PT BAL) Estate	2020	May-19		-			
		KKPA BAL Estate	2020	May-19		-			
23	PT Mitral Austral Sejahtera	MAS Mill	NA	NA	Sanggau District – West Kalimantan	NA	NA	The properties was sold and currently SDP have no control in the management. Please find latest information on 'Updates on PT MAS' worksheet and updates to RSPO Secretariat.	
		MAS 1 Estate	NA	NA		NA			
		MAS 2 Estate	NA	NA		NA			
		MAS 4 Estate	NA	NA		NA			
		Plasma MAS Estate	NA	NA		NA			

Legends

Properties was sold.

Mill closed  
down/Mothballed

NA - NOT APPLICABLE

**SIME DARBY PLANTATION - RSPO Certification for Time Bound Plan - NBPOL Operations**

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date
	SOU Name					
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	NA	Guadalcanal Province, Solomon Islands	Certified	18-Mar-11
		Tetere Estate				
		Ngalimbiu Estate				
		Mbalisuna Estate				
		Smallholders – West Zone (83)				
		Smallholders – Central Zone (53)				
		Smallholders – MBA East Zone (59)				
		Smallholders – MBE East Zone (37)				
2	Milne Bay Estates (MBE)	Hagita Oil Mill	NA	Milne Bay Province, Papua New Guinea	Certified	15-Feb-18
		Giligili Estate				
		Hagita Estate				
		Waigani Estate				
		Sagarai Estate				
		Padipadi Estate				
		Mariawatte Estate				
		Smallholders - East Gurney Estate (264)				
		Smallholders - West Gurney Estate (229)				
		Smallholders - East Sagarai Estate (157)				
		Smallholders - West Sagarai Estate (221)				

3	Poliamba (POL)	Poliamba Oil Mill		New Ireland Province, Papua New Guinea	Certified	19-Mar-12
		Kara Estate				
		Nalik Estate				
		West Coast Estate				
		Noatsi Estate				
		Madak Estate				
		Smallholders -North Division (615)				
		Smallholders- South Division (868)				
		Smallholders -West Division (309)				
4	Ramu Agricultural Industries Ltd (RAIL)	Gusap Mill	NA	Morobe Province, Papua New Guinea	Certified	5-Aug-10
		Gusap East (Gusap) Estate				
		Gusap West (Paddox) Estate				
		Surinam Estate				
		Dumpu Estate				
		Ngaru Estate				
		J Estate (Jephcott) Estate				
		Smallholders - Madang VOPs (71)				
		Smallholders - Morobe VOPs (253)				

5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	NA	Oro Bay Province, Papua New Guinea	Certified	1-Feb-13
		Mamba Oil Mill				
		Embi Estate				
		Ambogo Estate				
		Sangara Estate				
		Sumbiripa Estate				
		Mamba Estate				
		Sambogo Estate				
		Scheme Smallholder Sorovi Division(2019)				
		Scheme Smallholder Saiho Division(842)				
		Scheme Smallholder Aeka Division (911)				
		Scheme Smallholder Igora Division (1367)				
		Scheme Smallholder Ilimo Division (671)				
6	West New Britain (WNB)	Mosa Oil Mill	NA	Kimbe, West New Britain, Papua New Guinea	Certified	10-Sep-08
		Kumbango Oil Mill				
		Kapiura Mill				
		Numundo Mill				
		Waraston Mill				
		Bebere Estate				
		Kumbango Estate				
		Togulo Estate				
		Dami Estate				
		Waisisi Estate				
		Kautu Estate				
		Karaisu Estate				
		Moroa Estate				
		Bilomi Estate				

		Loata Estate Haella Estate Garu Estate Daliavu Estate Sapuri Estate Malilimi Estate Rigula Estate Nomundo Estate Navarai / Karato ME /KDC EU Estate Volupai / Lotomgam / Natupi / Goruru Estate Lolokoru Estate Ove Estate Tamare Estate Smallholders LSS Mosa (1822) Smallholders VOP East (1817) Smallholders VOP Central (1964) Smallholders VOP West (1279) Smallholders LSS Kapiura (551) Smallholders VOP Kapiura (850) Smallholders Kaulong/Akami/Pushiki/Repamira/Sakapei (20)				
7	Markham Farming Company Limited (MFCL) / Markham Agro Pte. Ltd.	Munum Estate Erap Estate	Sep-20	Markham Farms	Planned	The RACP is at the submission of Compensation Plan. <a href="https://www.rspo.org/certification/public-announcement">https://www.rspo.org/certification/public-announcement</a>

**SIME DARBY PLANTATION - 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	Not Applicable - Property disposed	Grand Cape Mount County	Not yet Certified	NA	<p>As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI).</p> <p><a href="http://www.simedarbyplantation.com/media/press-releases/sime-darbyplantation-completes-divestment-of-its-liberia-operations">http://www.simedarbyplantation.com/media/press-releases/sime-darbyplantation-completes-divestment-of-its-liberia-operations</a></p>
		Bomi Estate					
		Lofa Estate					
		Matambo Estate					
		Grand Cape Mount Estate					