



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

**File Ref: ES10170005**

**RSPO PUBLIC SUMMARY REPORT**

**CLIENT : SIME DARBY PLANTATION BERHAD – SOU 17 KEMPAS**

**PARENT COMPANY : SIME DARBY PLANTATION BERHAD**

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

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

Certification Unit	Mill / Estate	Location		
		Latitude	Longitude	Address
KEMPAS Strategic Operating Unit (SOU 17)	Kempas Oil Mill	N 2.3211	E 102.4269	77000, Jasin, Melaka
	Kempas Estate	N 2.2770	E 102.4652	71000, Jasin, Melaka
	Kemuning Estate	N 2.4643	E 102.3380	76460, Tebong, Melaka
	Tangkah Estate	N 2.3435	E 102.6375	84900, Tangkak, Johor
	Serkam Estate	N 2.3060	E 102.4610	71000, Jasin, Melaka

**MAP :** See Attachment 1

**AUDIT DATE :** 10-14 February 2020

**DURATION :** 25 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 Identity Preserved Supply Chain Model

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

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

Non-conformity Report(s) ☐

List of additional site(s) ☐

**Report by Audit Team Leader**

Name : Mohd Ab Raouf bin Asis

Signature :

Date : 5/06/2020

**Acknowledgement by Client's Representative**

Name :

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

Signature :

Date :

SENIOR MANAGER  
MD RAPIT BIN SUMAN

5/6/2020

## RSPO PUBLIC SUMMARY REPORT

### SUMMARY OF AUDIT

#### Recertification Audit 2

On-site audit date	:	10 - 14 February 2020	No. of auditor days	:	25 Auditor Days
Audit team	:	Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar bin Kamaruzaman, Rozaimie bin Ab Rahman, Rahayu binti Zulkifli, Mohd Norddin bin Abd Jalil.			
No. of major NCR	:	3	Indicator: 4.1.1, 4.2.1, 3.6.2	Closing date	: 4/5/2020
No. of minor NCR	:	5	Indicator : 1.1.5, 2.1.3, 3.5.1, 6.5.4, 6.7.2		
Indicate the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities	Suppliers
		√	N/A	√	√
		Contract workers	NGOs	Govt. agency	Independent growers
		√			
		Indigenous people	Contractor	Others (Please specify)	
		N/A	√		
Supply base sampled	:	Kempas Estate, Kemuning Estate, Tangkah Estate and Serkam Estate			
Justification of audit planning	:	<p>Total allocation of auditor days for Kempas CU were:            Mill = 5 days (1 day for social, 1 day for supply chain certification systems and 3 days for safety and health, environment, mill best practices, GHG verification, TBP, Partial Certification).</p> <p>Kempas, Kemuning, Tangkah &amp; Serkam Estate = 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.</p>			
Changes since the last audit	:	<p>1) In ASA4, Serkam Division was excluded from Kempas CU. However, it was included back into the supply base of Kempas CU during this recertification audit.</p> <p>2) Kempas CU has applied to change their supply chain model from MB to IP. The application has been submitted in June 2019 and approved by RSPO EB. It has been noted that during this reporting period, Kempas CU was receiving the outside crop until May 2019.</p>			
Report approved by	:	Kamini Sooriamoorthy		Date: 29/05/2020	

#### 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	:				

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### 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
	Contract workers	NGOs	Govt. agency
	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
	Contract workers	NGOs	Govt. agency
	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
	Contract workers	NGOs	Govt. agency
	Indigenous people	Contractors	Others (Please specify)
Supply base sampled :			
Justification of audit planning			
Changes since the last audit :			
Report approved by :		Approval date :	

# RSPO PUBLIC SUMMARY REPORT

## SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	March 2020 – February 2021				April 2019 – March 2020
Certified FFB Processed (MT)	278,225.48				206,341.44
Production of Certified CPO (MT)	59,818.48				42,506.33 (MB) 45,869.00 (IP)
Production of Certified PK (MT)	15,302.40				10,729.75 (MB) 11,523.00 (IP)
Certified Areas (Ha)	*12,031.81				**9,888.57
Planted Area (Ha) (Mature + Immature)	*11,268.75				***9,438.13
Production Area (Ha) (Planted – Immature)	10,151.12				8,767.08
HCV Areas	47.79				47.79
REMARKS	<p>ASA4 i.e. Apr 2019 – March 2020 :  **Serkam Division excluded from Kempas SOU supply base.  ***Land acquisition at Kemuning Estate.  <u>Recertification audit i.e. March 2020 – April 2021</u>  *Certified &amp; Planted area different compare to last year due to:  i) Addition of Serkam Estate into Kempas CU.  ii) The reference was made to outdated quit rent for total hectare. The current figure is in accordance to exact land title.  iii) Land acquisition by State Gov project on Rumah Mampu Milik.</p>				

TABLE 2-MB

	CPO	PK
Last years certified volume (MT)	*42,506.33	*10,729.75
Last year's actual certified sold (MT)	6,521.13	2,276.34
Last year's actual sold under other schemes (MT)	0.00	0.00
Last year's sold conventional (MT)	12,721.55	2,725.02
New year certified volume (MT)	NA	NA

\*PT approved 11/05/2019

TABLE 2-IP

	CPO	PK
Last years certified volume (MT)	**45,869.00	**11,523.00
Last year's actual certified sold (MT)	13,719.01	2,270.56
Last year's actual sold under other schemes (MT)	0.00	0.00
Last year's sold conventional (MT)	14,407.34	4,175.75
New year certified volume (MT)	59,818.48	15,302.40

\*PT approved 15/12/2019

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## RSPO PUBLIC SUMMARY REPORT

### 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

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd. Ab Raouf bin Asis	Lead Auditor / Safety, Environment, TBP	Holds a B.Sc. in Manufacturing (Production and Operation). He had more than 7 years of working experience in the oil palm operation. He has experience in auditing since 2016. He was successfully attended Quality Management System (ISO 9001:2015) and OHS 18001:2007 lead assessor course in 2016. Currently he qualified for RSPO P&C Lead Auditor and MSPO Lead Auditor.
Mohd Zulfakar bin Kamaruzaman	Auditor / Supply Chain, Social, HCV	Holds a B.Sc. Forestry from UPM. He had several years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C and RSPO Supply Chain.
Rozaimie bin Ab Rahman	Auditor / Safety and Environment	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.
Rahayu binti Zulkifli	Auditor / Social	Graduated with LLB (Hons), a practising lawyer, Head of Legal Dept. for several companies before working with an environmental NGO in 2003 and joined the RSPO in 2014. A freelance (since 2016), an expert in social aspect of the RSPO and a qualified auditor for RSPO P&C.
Mohd Norddin bin Abdul Jalil	GAP	Holds a B.Sc.in Agriculture from Universiti Pertanian Malaysia. He has over 35 years working experience in the oil palm plantation operation. He is qualified auditor for RSPO P&C.

### **1.3 Audit methodology**

The audit covered the Kempas palm oil mill and all four (4) of its supply base. The supply base covered during the audit are Kempas Estate, Kemuning Estate, Tangkah Estate and Serkam Estate. The audit included an on-site audit to the estates, mill, linesite, local communities, contractors and suppliers to verify the implementation of the requirement of the RSPO certification system. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

### **1.4 Stakeholder Consultation**

SIRIM QAS International had initiated the stakeholder consultation by announcing the invitation in the RSPO and SIRIM QAS International's websites in 19/01/2020. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs). Stakeholder consultation was carried out during the on-site audit. In general, there was no negative comments made against this Certification Unit.

In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below:

<b>Stakeholders interviewed</b>	<b>Evidence from stakeholder consultation</b>
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 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, many have heard about the new Minimum Wages but there has been no formal briefing on the amount yet.</li> <li>c. Any overtime work is mutually agreed between workers and management, and that there is no element of forcing. However, Mill workers are concerned that for the past few months, there is a reduction in overtime work which means their wages are also reduced. Nevertheless, they understand that this is due to a reduction in FFB processed.</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. However, one worker at Tangkah Estate has now changed his mind and wishes to keep his own passport.</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> </ul>
2) Settlers	Not applicable
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> <li>▪ Generally the villagers have no issue except from one of the kampung saying that a small portion of his land has been dug up for trench bordering Sime Darby Plantation. The CU will commence discussions with the affected villager who wanted only a bridge to be build across the trench to allow him access to his land.</li> </ul>
4) Suppliers	No issue raised. Payments are received in time.

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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	▪ DOE and DWNP.
8) Independent growers / Smallholders	▪ No complaints. ▪ Fair & timely payments for FFB supplied.
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)	VMO Tangkah Estate has voiced out his concern on the safety condition of the creche premises.

### 1.5 Audit plan:

Refer to Attachment 2.

### 1.6 Date of next audit:

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

## 2.0 SCOPE OF CERTIFICATION AUDIT

### 2.1 Description of the certification unit

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

The Kempas CU comprises of the Kempas Palm Oil Mill (Kempas POM) and four (4) supply base i.e. Kempas Estate, Kemuning Estate, Tangkah Estate and Serkam Estate. All the estates are owned by SDPB. The Kempas POM has a mill capacity of 60 mt/hr. All the estates have been fully developed before 2005, hence Principle 7 of the RSPO P&C is therefore not applicable.

Kempas CU has applied to change their supply chain model from MB to IP. The application has been submitted in June 2019 and approved by RSPO EB. It has been noted that during this reporting period, Kempas CU was receiving the outside crop until May 2019. Starting in June 2019, only 100% certified crop received and processed.



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

From Feb 2019 to May 2019, the FFB is sourced from company owned estates that were certified and small holders and small growers surrounding the Kempas CU. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

**Table 1-MB: Actual FFB production by the supply base for the period from Feb 2019 to May 2019**

Estate	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
KEMPAS	33,457.87	35.758%	SIRIM
KEMUNING	23,462.33	25.075%	SIRIM
SERKAM	7,957.63	8.505%	SIRIM
TANGKAH	16,985.51	18.153%	SIRIM
BUKIT ASAHAN	1,609.69	1.720%	BSI
DIAMOND JUBILEE	2,049.79	2.191%	BSI
LANADRON	1,784.14	1.907%	BSI
WELCH	663.71	0.709%	BSI
PENGKALAN BUKIT	2,047.24	2.188%	BSI
PAGOH	1,270.26	1.358%	BSI
SG BAHRU	1,279.64	1.368%	CUC
KOK FOH	544.22	0.582%	MUTU AGUNG
SG SABALING	95.98	0.103%	MUTU AGUNG
ST HELIAR	171.98	0.184%	MUTU AGUNG
BUKIT PILAH	188.10	0.201%	MUTU AGUNG
<b>Total</b>	93,568.09	100.0%	-
Third parties			
EHL	21,269.80	81.701%	-
PERTANIAN	4,546.17	17.463%	-
ASIATIC CHENG	83.58	0.321%	-
CHEONG WING CHAN	134.15	0.515%	-
<b>Total</b>	26,033.70	100.00%	-
<b>Grand Total</b>	119,601.79		

Consistent with the application to change the supply chain model to IP, for the period from June 2019 to Jan 2020, the FFB is sourced from company owned estates that were 100% certified.

**Table 1-IP: Actual FFB production by the supply base for for the period from June 2019 – Jan 2020**

Estate	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
KEMPAS	40,435.26	30.562%	SIRIM
KEMUNING	29,078.10	21.978%	SIRIM
SERKAM	18,971.11	14.339%	SIRIM
TANGKAH	29,110.60	22.002%	SIRIM
BUKIT ASAHAN	1,982.93	1.499%	BSI
DIAMOND JUBILEE	11,537.57	8.720%	BSI
WELCH	101.82	0.077%	BSI
SG BAHRU	69.81	0.053%	CUC
KOK FOH	394.43	0.298%	MUTU Agung
SG SABALING	39.61	0.030%	MUTU Agung
ST HELIAR	156.27	0.118%	MUTU Agung
SG SENARUT	197.78	0.149%	MUTU Agung
SG GEMAS	231.07	0.175%	MUTU Agung
<b>Total</b>	132,306.36	100.00%	-

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

Estates	FFB Contribution	
	Tonnes	Percentage (%)
Kempas	110,771.36	39.8%
Kemuning	68,759.93	24.7%
Tangkah	56,685.10	20.4%
Serkam	42,009.09	15.1%
<b>Total</b>	<b>278,225.48</b>	<b>100%</b>

**Table 3-MB: Actual FFB received and CPO & PK dispatch by Kempas Mill for the last reporting period  
(Feb 2019 – May 2019)**

RSPO Supply Chain Model: Mass Balance	Total (MT)
FFB Received	119,601.79
FFB Processed	118,718.93
Certified FFB Processed	93,568.09
Non – Certified FFB Processed	25,150.84
Crude Palm Oil (CPO)	
Overall CPO Production	24,548.03
Certified CPO Production	19,242.68
Certified CPO Delivered as RSPO	6,521.13
Certified CPO Delivered as Non-RSPO	12,721.55
Certified CPO Delivered under other sustainable schemes	-
Credits traded through Book and Claim	-
Palm Kernel (PK)	
Overall PK Production	6,405.56
Certified PK Production	5,001.36
Certified PK Delivered as RSPO	2,276.34
Certified PK Delivered as non RSPO	2,725.02
Certified PK Delivered under other sustainable schemes	-
Credits traded thru Book & Claim	-

**Table 3-IP: Actual FFB received and CPO & PK dispatch by Kempas Mill for the last reporting period  
(Jun 2019 - Jan 2020)**

RSPO Supply Chain Model: Identity Preserved	Total (MT)
FFB Received	132,306.36
FFB Processed	131,715.54
CPO Production	28,195.16
PK Production	6,961.68
CPO Delivered as RSPO Certified	13,719.01
CPO Delivered under other schemes (MT)	-
CPO Delivered as Non-RSPO certified	14,407.34
PK Delivered as RSPO certified	2,270.56
PK Delivered under other schemes (MT)	-
PK Delivered as Non-RSPO certified	4,175.75
Credits traded thru Book & Claim	-

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**Table 4: Projected FFB received and CPO & PK dispatch by the Kempas Mill of the next reporting period  
(Mar 2020 – Feb 2021)**

RSPO Supply Chain Model: Identity Preserved	Total (MT)
FFB Received	278,225.48
FFB Processed	278,225.48
CPO Production	59,818.48
PK Production	15,302.40
CPO Delivered as RSPO Certified	59,818.48
CPO Delivered as Non-RSPO certified	-
PK Delivered as RSPO certified	15,302.40
PK Delivered as Non-RSPO certified	-

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

Estate	Planted (ha)	Certified (ha)
Kempas Estate	4,405.73	4,566.32*
Kemuning Estate	2,535.45	2,670.28**
Tangkah Estate	2,496.20	2,680.98
Serkam Estate	1,831.37	2,114.23
<b>Total</b>	<b>11,268.75</b>	<b>12,031.81</b>

\*Land acquisition at Kempas Estate approximately 23.18 ha

\*\*The reference was made to outdated quit rent for total hectare. The current figure is in accordance to exact land title

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

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1991	1 <sup>st</sup> cycle	Mature	111.05	2.52%
1992	1 <sup>st</sup> cycle	Mature	458.92	10.42%
1993	1 <sup>st</sup> cycle	Mature	195.89	4.45%
1994	1 <sup>st</sup> cycle	Mature	720.15	16.35%
1995	1 <sup>st</sup> cycle	Mature	650.8	14.77%
1998	1 <sup>st</sup> cycle	Mature	81.51	1.85%
2000	2 <sup>nd</sup> cycle	Mature	289.57	6.57%
2001	2 <sup>nd</sup> cycle	Mature	44.47	1.01%
2003	2 <sup>nd</sup> cycle	Mature	40.18	0.91%
2005	2 <sup>nd</sup> cycle	Mature	8.60	0.20%
2006	2 <sup>nd</sup> cycle	Mature	22.00	0.50%
2009	2 <sup>nd</sup> cycle	Mature	57.09	1.30%
2011	2 <sup>nd</sup> cycle	Mature	199.36	4.53%
2013	2 <sup>nd</sup> cycle	Mature	158.77	3.60%
2014	2 <sup>nd</sup> cycle	Mature	231.11	5.25%
2016	2 <sup>nd</sup> cycle	Mature	312.46	7.09%
2017	2 <sup>nd</sup> cycle	Immature	322.19	7.31%
2018	2 <sup>nd</sup> cycle	Immature	66.49	1.51%
2019	2 <sup>nd</sup> cycle	Immature	200.89	4.56%
<b>Total</b>			<b>4,405.73</b>	<b>100.00</b>

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

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2000	2 <sup>nd</sup> cycle	Mature	186.85	7.49
2009	2 <sup>nd</sup> cycle	Mature	294.59	11.80
2002	2 <sup>nd</sup> cycle	Mature	198.21	7.94
2005	2 <sup>nd</sup> cycle	Mature	156.72	6.28

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2008	2 <sup>nd</sup> cycle	Mature	64.52	2.58
1997	1 <sup>st</sup> cycle	Mature	303.02	12.14
1999	1 <sup>st</sup> cycle	Mature	43.55	1.74
2006	2 <sup>nd</sup> cycle	Mature	250.35	10.03
2008	2 <sup>nd</sup> cycle	Mature	153.97	6.17
2001	2 <sup>nd</sup> cycle	Mature	399.54	16.01
2007	2 <sup>nd</sup> cycle	Mature	38.98	1.56
1995	1 <sup>st</sup> cycle	Mature	50.10	2.01
1998	1 <sup>st</sup> cycle	Mature	23.37	0.94
2010	2 <sup>nd</sup> cycle	Mature	94.71	3.79
2011	2 <sup>nd</sup> cycle	Mature	78.98	3.16
2012	2 <sup>nd</sup> cycle	Mature	71.11	2.85
2013	2 <sup>nd</sup> cycle	Mature	87.63	3.51
Total			2,496.2	100

**Table 8: Planting profile for Kemuning Estate**

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1995	1 <sup>st</sup> cycle	Mature	3.9	0.15%
1999	1 <sup>st</sup> cycle	Mature	189.91	7.49%
2000	2 <sup>nd</sup> cycle	Mature	554.96	21.89%
2001	2 <sup>nd</sup> cycle	Mature	213.72	8.43%
2002	2 <sup>nd</sup> cycle	Mature	302.1	11.92%
2005	2 <sup>nd</sup> cycle	Mature	137.4	5.42%
2006	2 <sup>nd</sup> cycle	Mature	68.3	2.69%
2007	2 <sup>nd</sup> cycle	Mature	158.5	6.25%
2008	2 <sup>nd</sup> cycle	Mature	43.6	1.72%
2009	2 <sup>nd</sup> cycle	Mature	117.7	4.64%
2010	2 <sup>nd</sup> cycle	Mature	221.73	8.75%
2011	2 <sup>nd</sup> cycle	Mature	54.3	2.14%
2012	2 <sup>nd</sup> cycle	Mature	49.4	1.95%
2013	2 <sup>nd</sup> cycle	Mature	166.1	6.55%
2014	2 <sup>nd</sup> cycle	Mature	113	4.46%
2015	2 <sup>nd</sup> cycle	Mature	60.1	2.37%
2017	2 <sup>nd</sup> cycle	Immature	80.73	3.18%
Total			2,535.45	100.00

**Table 9: Planting profile for Serkam Estate**

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2001	2 <sup>nd</sup> cycle	Mature	34.83	1.90%
2002	2 <sup>nd</sup> cycle	Mature	221.75	12.11%
2005	2 <sup>nd</sup> cycle	Mature	147.21	8.04%
2006	2 <sup>nd</sup> cycle	Mature	122.42	6.68%
2007	2 <sup>nd</sup> cycle	Mature	86.08	4.70%
2009	2 <sup>nd</sup> cycle	Mature	103.9	5.67%
2010	2 <sup>nd</sup> cycle	Mature	118.84	6.49%
2013	2 <sup>nd</sup> cycle	Mature	259.57	14.17%
2015	2 <sup>nd</sup> cycle	Mature	126.68	6.92%
2016	2 <sup>nd</sup> cycle	Mature	162.76	8.89%
2017	2 <sup>nd</sup> cycle	Immature	144.71	7.90%
2018	2 <sup>nd</sup> cycle	Immature	93.12	5.08%

## RSPO PUBLIC SUMMARY REPORT

	2019	2nd cycle	Immature	209.50	11.44%
	Total			1,831.37	100%

**2.3 Organizational Information/Contact Person**

The details of the contact person is as shown below:

Name	:	Mr Rapi bin Suman
Position	:	Senior Manager, Kempas Estate
Address	:	Ladang Kempas, KB 1710, 77000 Jasin, Melaka Malaysia
Phone no.	:	+606 263 1305
Fax no.	:	+606 263 5260
Email	:	<a href="mailto:rapi.suman@simedarbyplantation.com">rapi.suman@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:**  
There was 3 SOU located in Indonesia, Papua New Guinea (NBPOL), and Liberia not yet certified. Details issues related to these were covered in the section - RSPO Certifications Systems for Principles & Criteria June 2017, in this report.

ii. Are there any changes to the organization's time bound ☐ 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 PUBLIC SUMMARY 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)	<b>List : 5</b>	RZ 01 2020 (1.1.5), RZ 02 2020 (3.5.1), RZ 05 2020 (6.5.4), MAR 02 2020 (2.1.3), RAR 01 2020 (6.7.2)
--------------------------------------------------------------	-----------------	------------------------------------------------------------------------------------------------------

Total no. of major NCR(s) (details refer to Attachment 4)	<b>List : 3</b>	RZ 03 2020 (4.1.1), RZ 04 2020 (4.2.1), MAR 01 2020 (3.6.2)
--------------------------------------------------------------	-----------------	-------------------------------------------------------------

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

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

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

## 5.0 AUDIT CONCLUSION

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

## RSPO PUBLIC SUMMARY REPORT

### 6.0 RECOMMENDATION

☐ **No NCR recorded. Recommended to continue certification.**

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

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

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

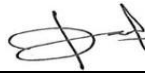
☒ Recommended to continue certification.

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

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

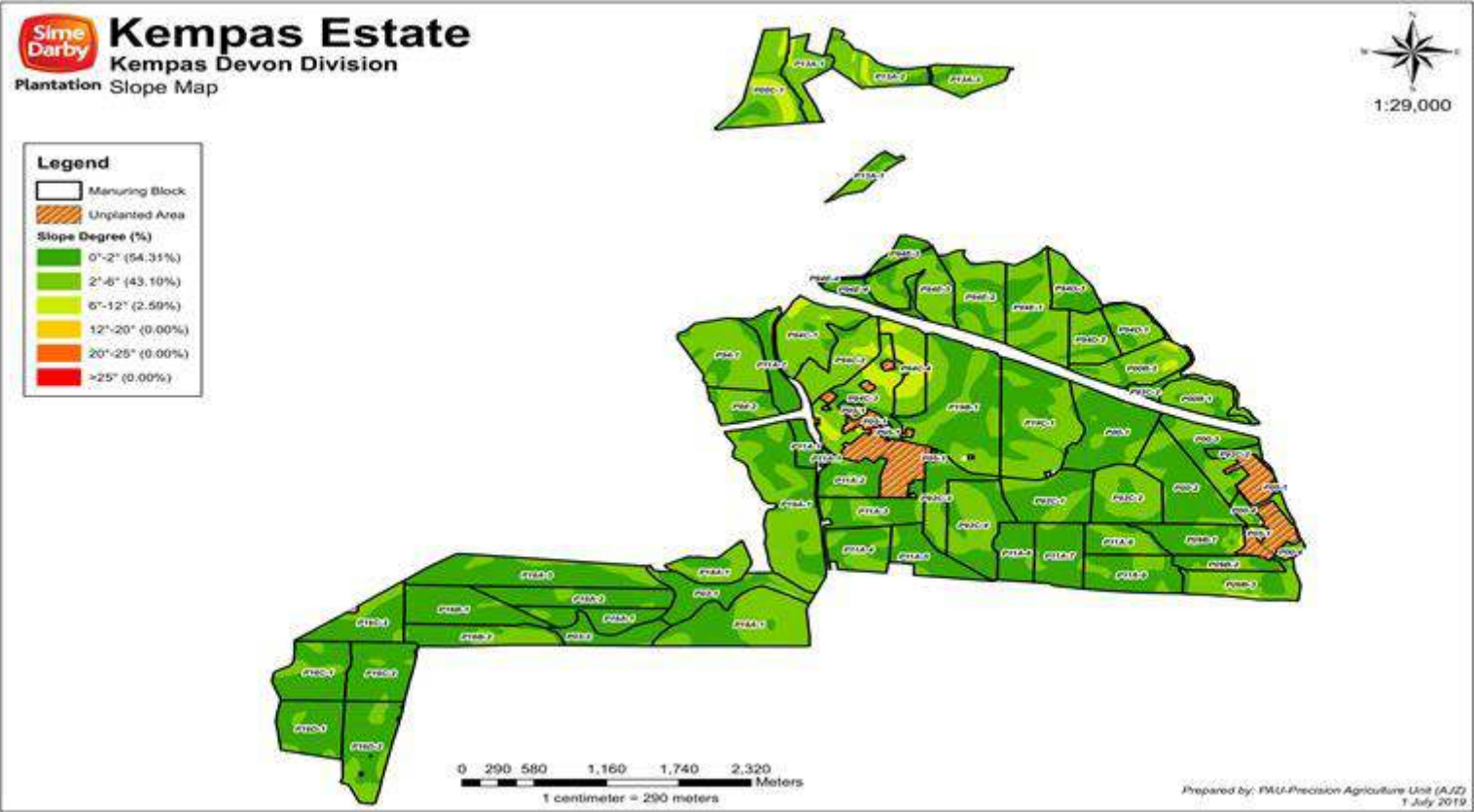
**7.0 IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED. RECOMMENDED FOR CONTINUATION OF RSPO P & C CERTIFICATION.**

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

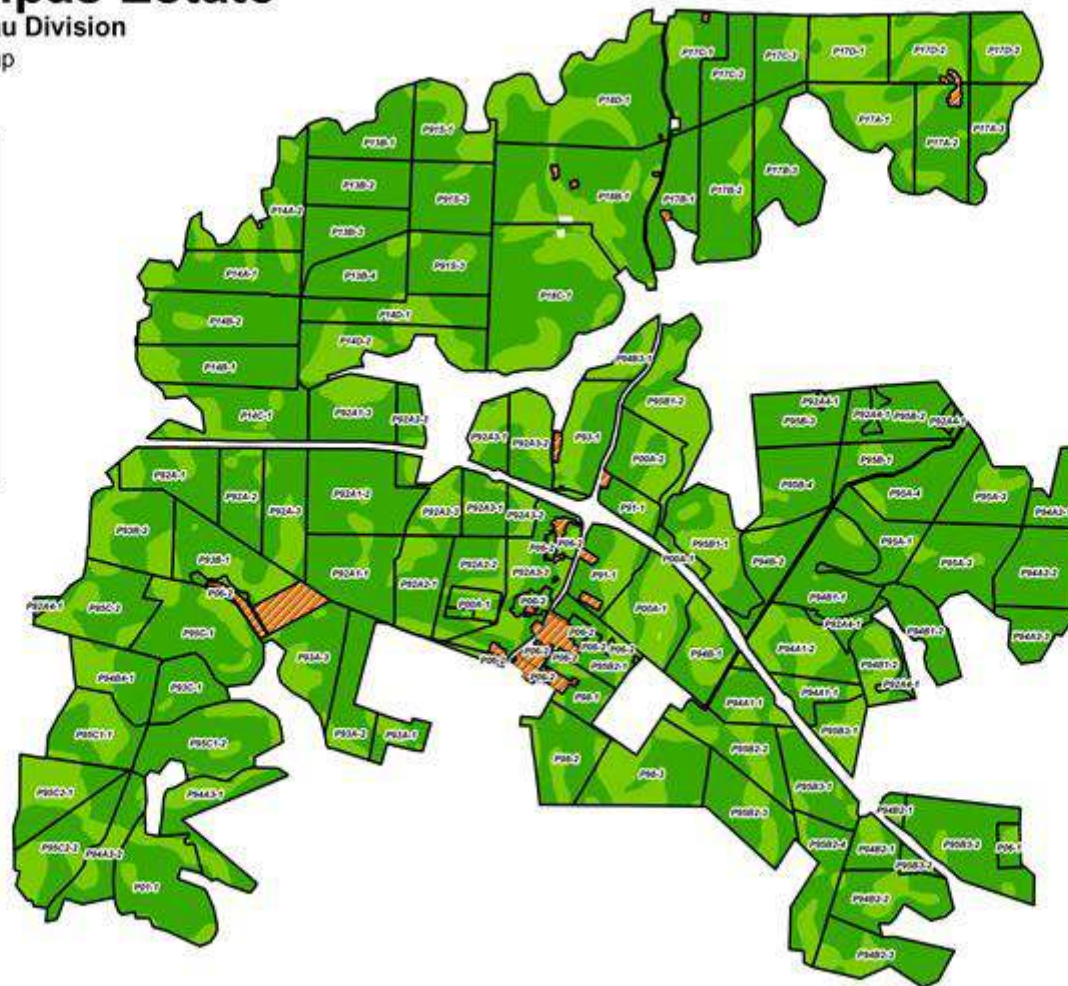
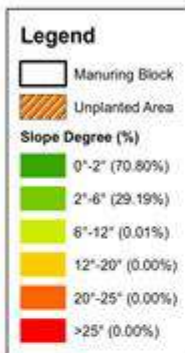
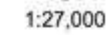
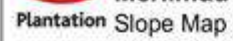
  
(Signature)

4/5/2020  
(Date)

Map of Kempas Estate







0 270 540 1,080 1,620 2,160 Meters  
1 centimeter = 270 meters

Prepared by: PAU-Precision Agriculture Unit (A/JZ)  
1 July 2019



# Kemuning Estate

## Air Panas Division

### Slope & Contour Map



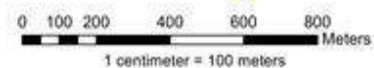
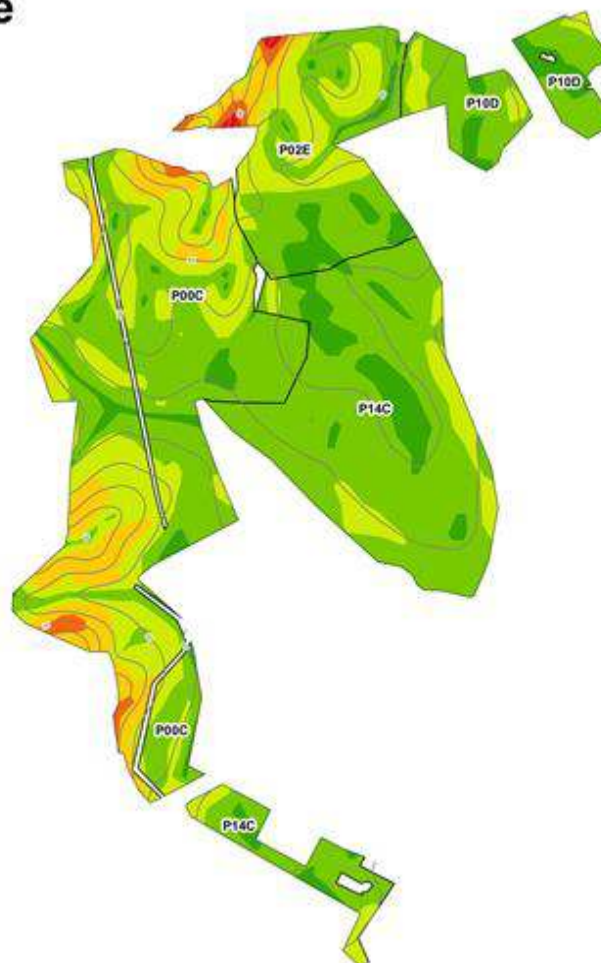
#### Legend

- Contour - 10m
- Field Boundary

#### Slope Degree (%)

- 0°-2° (18.97%)
- 2°-6° (58.00%)
- 6°-12° (19.73%)
- 12°-20° (3.19%)
- 20°-25° (0.11%)
- >25° (0.01%)

Data Source : IFSAR 2008  
Vertical Accuracy : 10 meters  
Projection : Universal Transverse Mercator 48N  
Datum : WGS 1984  
Print Scale: A3 (W29.7 cm x H42.0 cm)



Prepared by: R&D-Precision Agriculture Unit (RHM)  
February 2019



# Kemuning Estate

## Gemencheh Division

### Slope & Contour Map



1:16,000



#### Legend

- Contour - 10m
- Field Boundary

#### Slope Degree (%)

- 0°-2° (18.97%)
- 2°-6° (58.00%)
- 6°-12° (19.73%)
- 12°-20° (3.19%)
- 20°-25° (0.11%)
- >25° (0.01%)

Data Source : IFSAR 2008  
Vertical Accuracy : 10 meters  
Projection : Universal Transverse Mercator 48N  
Datum : WGS 1984  
Print Scale: A3 (W29.7 cm x H42.0 cm)

0 160 320 640 960 1,280  
Meters  
1 centimeter = 160 meters

Prepared by: R&D-Precision Agriculture Unit (NRM)  
February 2019



# Kru Estate Rumbia Division Slope & Contour Map



1:15,000



## Legend

	Contour - 10m
	Field Boundary
<b>Slope Degree (%)</b>	
	0°-2° (18.97%)
	2°-6° (58.00%)
	6°-12° (19.73%)
	12°-20° (3.19%)
	20°-25° (0.11%)
	>25° (0.01%)

Data Source : IFSAR 2008  
Vertical Accuracy : 10 meters  
Projection : Universal Transverse Mercator 48N  
Datum : WGS 1984  
Print Scale: A3 (W29.7 cm x H42.0 cm)

0 150 300 600 900 1,200 Meters  
1 centimeter = 150 meters

Prepared by: R&D-Precision Agriculture Unit (NHM)  
February 2019





# Kemuning Estate

## Rumbia Division

### Slope & Contour Map



#### Legend

- Contour - 10m
- Field Boundary
- Slope Degree (%)**
  - 0°-2° (18.97%)
  - 2°-6° (58.00%)
  - 6°-12° (19.73%)
  - 12°-20° (3.19%)
  - 20°-25° (0.11%)
  - >25° (0.01%)



Data Source : IFSAR 2008  
Vertical Accuracy : 10 meters  
Projection : Universal Transverse Mercator 48N  
Datum : WGS 1984  
Print Scale: A3 (W29.7 cm x H42.0 cm)

0 320 640 1,280 1,920 2,560 Meters  
1 centimeter = 315 meters

Prepared by: R&D-Precision Agriculture Unit (NHM)  
February 2019



# Kemuning Estate

## Tebong Division

### Slope & Contour Map



#### Legend

- Contour - 10m
- Field Boundary
- Slope Degree (%)**
  - 0°-2° (18.97%)
  - 2°-6° (58.00%)
  - 6°-12° (19.73%)
  - 12°-20° (3.19%)
  - 20°-25° (0.11%)
  - >25° (0.01%)



Data Source : IFSAR 2008  
Vertical Accuracy : 10 meters  
Projection : Universal Transverse Mercator 48N  
Datum : WGS 1984  
Print Scale: A3 (W29.7 cm x H42.0 cm)

0 220 440 880 1,320 1,760 Meters  
1 centimeter = 220 meters

Prepared by: R&D-Precision Agriculture Unit (NHM)  
February 2019



# Serkam Estate

Jasin Div  
Plantation Slope Map

Golf Agriculture



1:12,000

## Legend

Manuring Block

Unplanted Area

### Slope(Degree)

0°-2° (35.86%)

2°-6° (54.34%)

6°-12° (9.52%)

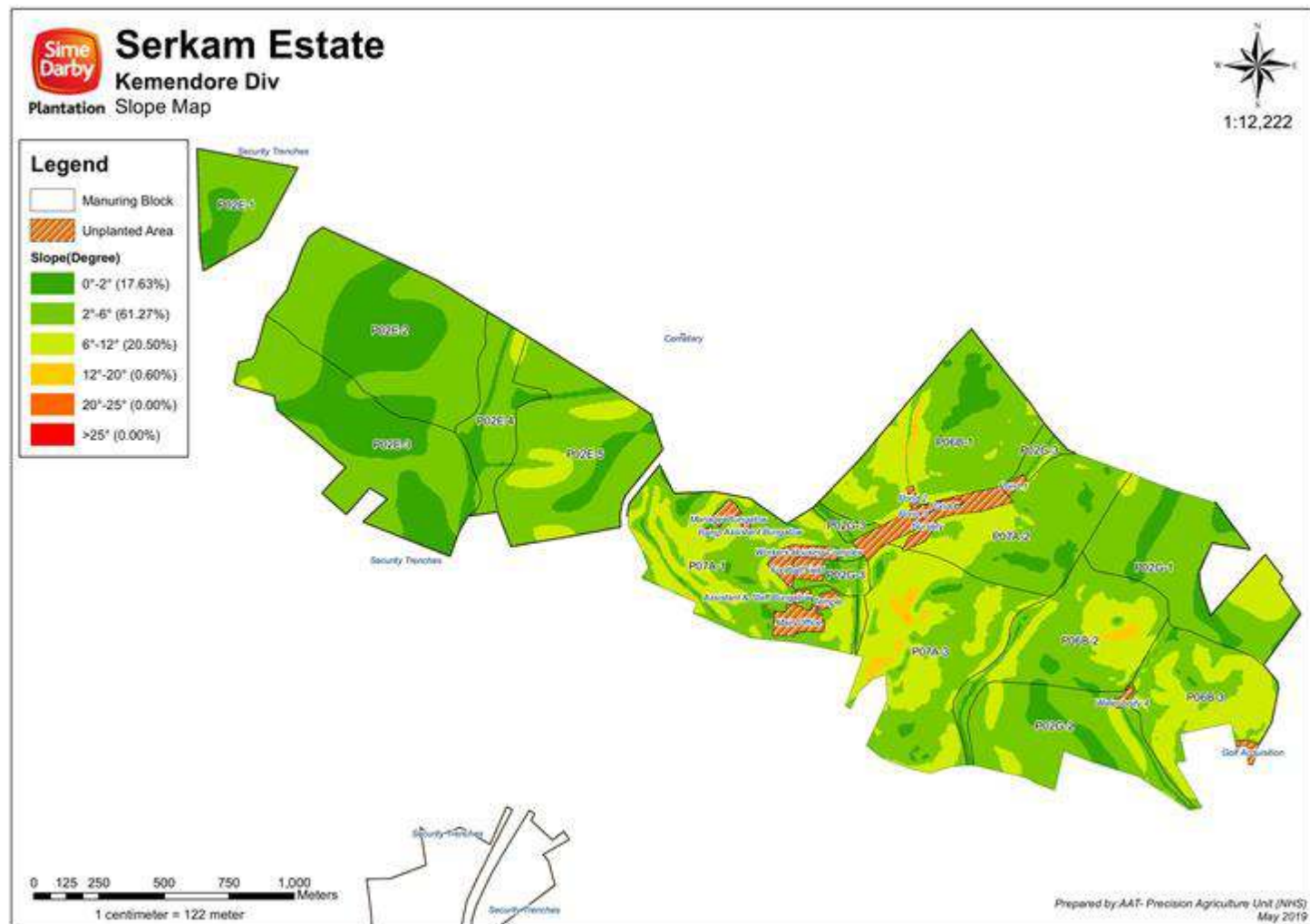
12°-20° (0.28%)

20°-25° (0.00%)

>25° (0.00%)

0 120 240 480 720 960 Meters  
1 centimeter = 120 meter

Prepared by: AAT: Precision Agriculture Unit (NH)  
May 201



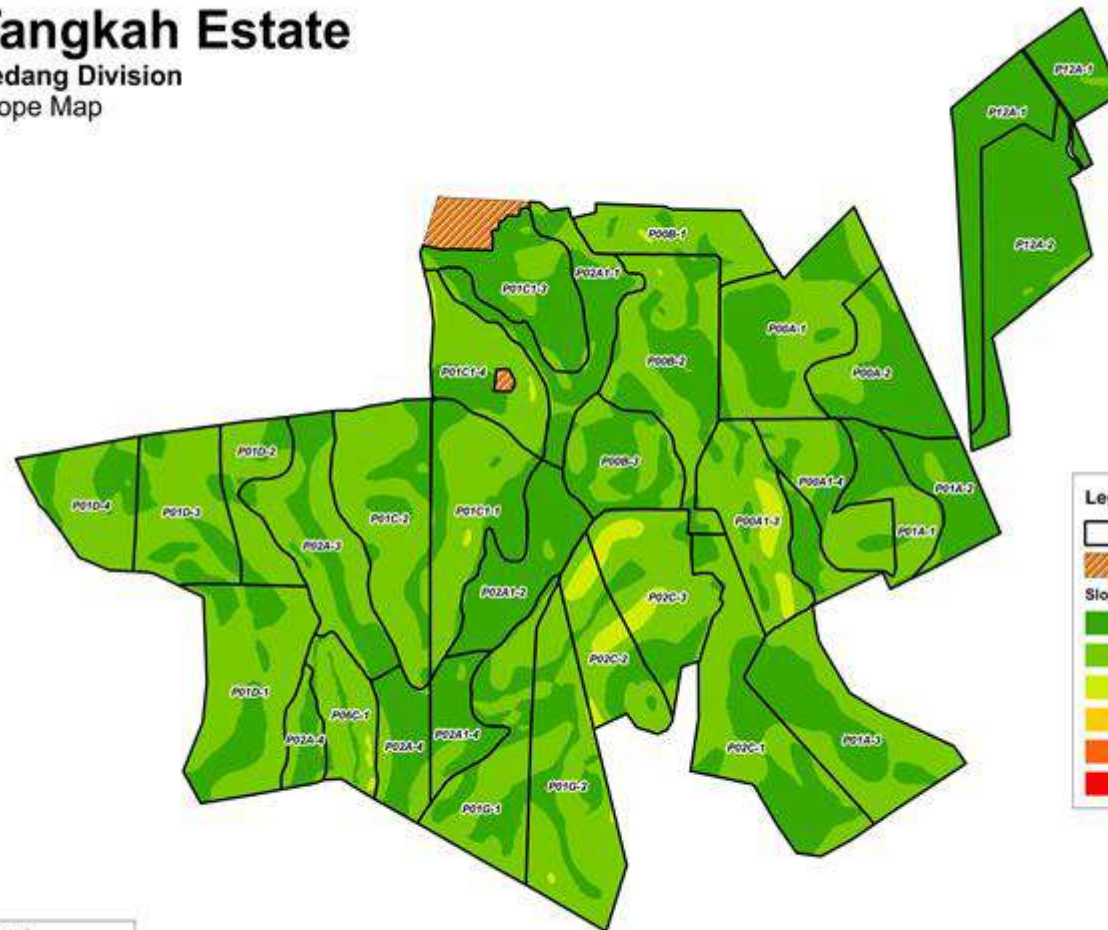




# Tangkah Estate

## Ledang Division

### Slope Map



#### Legend

- Manuring Block
- Unplanted Area
- Slope Degree (%)
  - 0° - 2° (47.90%)
  - 2° - 6° (50.56%)
  - 6° - 12° (1.54%)
  - 12° - 20° (0.00%)
  - 20° - 25° (0.00%)
  - >25° (0.00%)

Data Source : GPS Surveyed  
Projection : Universal Transverse Mercator 48N  
Datum : WGS 1984  
Vertical Reference : Height Above Ellipsoid  
Print Scale: A3 (W29.7 cm x H42.0 cm)

0 155 310 620 930 1,240 Meters  
1 centimeter = 155 meter

Prepared by: PAU- Precision Agriculture Unit (AJZ)  
04 July 2019

# Tangkah Estate

## New Division

### Slope Map



Data Source : GPS Surveyed  
Projection : Universal Transverse Mercator 48N  
Datum : WGS 1984  
Vertical Reference: Height Above Ellipsoid  
Print Scale: A3 (W29.7 cm x H42.0 cm)

Prepared by: PAU- Precision Agriculture Unit (AJ)  
04 July 20

## 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** : 10 - 14 February 2020

3. **Site of assessment** : Kempas Certification Unit;

- (i) Kempas Palm Oil Mill
- (ii) Kempas Estate
- (iii) Kemuning Estate
- (iv) Tangkah Estate
- (v) Serkam Estate

4. **Scope of certification** : Production of Sustainable Crude Palm Oil and Palm Kernel  
Using the Identity Preserved 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 (Safety, Partial Certification)
- (ii) Auditor : i) Mohd Zulfakar bin Kamaruzaman (Supply chain, Social, HCV)  
ii) Rozaimie bin Ab Rahman (Safety, Environment)  
iii) Rahayu binti Zulkifli (Social)  
iv) Mohd Norddin Abd Jalil (GAP)

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

## 7. Audit method

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

## 8. Audit Findings

Audit findings shall be classified as major and/or minor. 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

- Room for discussion
- Relevant document and record
- Personnel protective equipment if required
- Photocopy facilities
- A guide for each group

## 13. Assessment Programme Details :

Date / Time	Coverage of assessment / Activity / Site	Raouf	Rozaimiee	Zulfakar	Rahayu	Norddin
<b>Day 1: 10 Feb 2020 (Monday)</b>						
8.30am – 9.15am	<b>Opening Meeting – Venue: Eco Resort (Kempas Estate)</b> - Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes -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.	/	/	/	/	/
9.15am – 1.00pm	<b>Site observation to Kempas POM</b> <b>P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>Supply Chain</li> <li>Verification of basic information mill &amp; estate</li> <li>Confirmation of time bound plan &amp; review of partial certification</li> <li>Occupational safety &amp; health aspects, chemical management</li> <li>Environmental management, waste &amp; chemical management</li> <li>Legal requirement</li> <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, safety committee, worker representative, contractors, supplier, etc</li> </ul>	/	/	/	/	/
1.00pm – 2.00pm	Lunch Break / Zuhur prayer	/	/	/	/	/
2.00pm – 5.00pm	Continue assessment at respective sites (Kempas POM)	/	/	/	/	/

Date / Time	Coverage of assessment / Activity / Site	Raouf	Rozaimiee	Zulfakar	Rahayu	Norddin
<b>Day 2: 11 Feb 2020 (Tuesday)</b>						
8.30am – 1.00pm	<b>Site observation to Kempas Estate</b> <b>P1, P2, P3, P4, P5, P6, P7</b> -Occupational safety & health aspects, chemical management -Environmental management, waste & chemical management -Legal requirement -Social aspects - SIA, management plan & implementation, workers' quarters. -Land titles user rights -Stakeholder consultation with affected communities surrounding the CU -Good Agricultural Practice such as harvesting, weeding, spraying, --- EFB mulching, POME application, IPM, -New planting -Interview with gender committee, safety committee, worker representative, contractors, supplier, etc -Inspection of protected sites with HCV attributes -Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone	/	/	/	/	/
1.00pm – 2.00pm	Lunch Break and Zuhur prayer	/	/	/	/	/
2.00pm – 5.00pm	Continue assessment at respective sites (Kempas Estate)	/	/	/	/	/
Date/Time	Coverage of assessment / Activity / Site	Raouf	Rozaimiee	Zulfakar	Rahayu	Norddin
<b>Day 3: 12 Feb 2020 (Wednesday)</b>						
8.30am – 1.00pm	<b>Site observation to Kemuning Estate</b> <b>P1, P2, P3, P4, P5, P6, P7</b> -Occupational safety & health aspects, chemical management -Environmental management, waste & chemical management -Legal requirement -Social aspects - SIA, management plan & implementation, workers' quarters. -Land titles user rights -Stakeholder consultation with affected communities surrounding the CU -Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, -New planting -Interview with gender committee, safety committee, worker representative, contractors, supplier, etc -Inspection of protected sites with HCV attributes -Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone	/	/	/	/	/

1.00pm – 2.00pm	Lunch Break and Zuhur prayer	/	/	/	/	/
2.00-5.00 pm	Continue assessment at respective sites (Kempas Estate)	/	/	/	/	/
<b>Date/Time</b>	<b>Coverage of assessment / Activity / Site</b>	<b>Raouf</b>	<b>Rozaimee</b>	<b>Zulfakar</b>	<b>Rahayu</b>	<b>Norddin</b>
<b>Day 4: 13 Feb 2020 (Thursday)</b>						
8.30am – 1.00pm	<b>Site observation to Tangkah Estate</b> <b>P1, P2, P3, P4, P5, P6, P7</b> -Occupational safety & health aspects, chemical management -Environmental management, waste & chemical management -Legal requirement -Social aspects - SIA, management plan & implementation, workers' quarters. -Land titles user rights -Stakeholder consultation with affected communities surrounding the CU -Good Agricultural Practice such as harvesting, weeding, spraying, -- EFB mulching, POME application, IPM, -New planting -Interview with gender committee, safety committee, worker representative, contractors, supplier, etc -Inspection of protected sites with HCV attributes -Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone	/	/	/	/	/
1.00pm – 2.00pm	Lunch Break and Zuhur prayer	/	/	/	/	/
2.00pm – 5.00pm	Continue assessment at respective sites (Tangkah Estate)	/	/	/	/	/
<b>Date/Time</b>	<b>Coverage of assessment / Activity / Site</b>	<b>Raouf</b>	<b>Rozaimee</b>	<b>Zulfakar</b>	<b>Rahayu</b>	<b>Norddin</b>
<b>Day 5: 14 Feb 2020 (Friday)</b>						
8.30am – 12.30pm	<b>Site observation to Serkam Estate</b> <b>P1, P2, P3, P4, P5, P6, P7</b> -Occupational safety & health aspects, chemical management -Environmental management, waste & chemical management -Legal requirement -Social aspects - SIA, management plan & implementation, workers' quarters. -Land titles user rights -Stakeholder consultation with affected communities surrounding the CU -Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, -New planting -Interview with gender committee, safety committee, worker representative, contractors, supplier, etc -Inspection of protected sites with HCV attributes	/	/	/	/	/

	-Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone					
12.30pm – 2.30pm	Lunch Break and Jumaat prayer	/	/	/	/	/
3.00 pm - 4.00 pm	Verification on outstanding issues Audit team discussion, preparation on audit findings and issuance of nonconformity report (if any)	/	/	/	/	/
4.00 pm-5.00 pm	Closing meeting – venue at <b>SD Merlimau Training Centre</b> Presentation of audit findings, positive comment, Question & answer	/	/	/	/	/



## MALAYSIA NATIONAL INTERPRETATION 2019 FOR RSPO PRINCIPLE &amp; CRITERIA 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	SDPB 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 SDPB website address is <a href="http://www.simedarbyplantation.com/">http://www.simedarbyplantation.com/</a> .
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	The SDPB website address is available in English at <a href="http://www.simedarbyplantation.com/">http://www.simedarbyplantation.com/</a> .
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	All 3 Estates and Mill continued to maintain the records of requests for information and responses are maintained which included the government agencies, schools, local communities.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	SOU Kempas 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'. The procedure was made available on the notice boards in the Estate and Mill offices and Muster Grounds.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	NO	All units within SOU 17 Kempas has its own stakeholder list. However, the stakeholder lists of Kempas Palm Oil Mill, Kempas Estate, Kemuning Estate and Serkam Estate do not have complete information on stakeholders and the stakeholders' nominated representatives. Therefore, a Minor Non-Compliance RZ 01 of 2020 was raised.
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 17 Kempas 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.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	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 & Group Assurance Unit from HQ. Training for managers, assistant managers and executives which was held for the Melaka region in Jan 2020.

**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.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	YES	Generally, SOU 17 Kempas continue to comply with applicable local, national and ratified international laws and regulations.
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	YES	The documented system for ensuring legal compliance exists in the form of Legal and Other Requirements Register (LORR). SOU 17 Kempas have identified, documented and maintained their LORR with written information on legal requirements which related to their operations. The LORR for SOU 17 were updated in February 2020. The PSQM Department at Sime Darby headquarters tracks any changes to the law where it would then be disseminated to all its plantations and mills.
	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	Boundary stones / markers along the legal boundaries observed visibly maintained by the CU. Auditor has verified the boundary stone and pegs at Kempas Estate, Tangkah Estate, Serkam Estate and Kemuning Estate. The boundary pegs were visible along the boundary adjacent to another plantation area. All the physical markers/Boundary stones along the legal boundaries between was visibly available. However, some of the legal or authorised boundaries are not clearly demarcated and visibly maintained. Based on site visit at Kemuning Estate (Kru Div), there was not clearly authorized boundaries demarcated between Kru Div and small grower. Therefore, Major NCR raised as MAR 01 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 17 Kempas, 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.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	YES	All contracts signed with contractors contain a clause on compliance with employment laws, which would include laws related to employment of children and young persons.

Clause	Indicators	Comply Yes/No	Findings
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <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	Since June 2019, Kempas Palm Oil Mill became an Identity Preserved Mill and therefore only receives and processes FFB from its own internal sources namely Kempas Estate, Kemuning Estate, Tangkah Estate, Serkam Estate and other SD group of estates.
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	YES	Since June 2019, Kempas Palm Oil Mill has been an Identity Preserved Mill and therefore only receives and processes FFB from its own internal sources namely Kempas Estate, Kemuning Estate, Tangkah Estate, Serkam Estate and other SD group of estates. These Estates have its own MPOB licenses and information of geo-locations of FFB origins..

### **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	The Kempas SOU 17 continued to make commitment to long-term economic and financial viability. The annual budgets for 2020 to 2024 which included Capital and Operating Expenditures in addition to FFB yield/Ha, OER and CPO were sighted. The budget provisions cover activities for machinery and plant upkeep, expenditure for mature and immature oil palm upkeep, harvesting and evacuation, welfare, capital expenditure and RSPO compliance.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	The replanting programme for the next five years had been prepared as sighted in the Long-Range Replanting Programme (LRRP) 2020 to 2024. This programme reviewed once a year and is incorporated in their annual financial budget.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	It was evident that several meetings to discuss on issues related to sustainability such as Kempas Mill meeting (mill and its supply bases), Estate meeting (estates within SOU 17) and operation meeting (estate manager and estate key personnel) were held for effective implementation of RSPO.
3.2 The unit of certification regularly monitors and reviews	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and	YES	Based on the Management Plan 2020, the action plan was carried out based on consideration of the main social and environmental impacts. These include to continue engagement with relevant stakeholders (workers, surrounding communities, government agencies, agencies, suppliers and contractors.

Clause	Indicators	Comply Yes/No	Findings
their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	environmental impacts and opportunities of the unit of certification.		
	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>SOU 17 Kempas continued to use the documents established by the Sime Darby Plantation Bhd among others as follows;</p> <ul style="list-style-type: none"> <li>a) Plantations / Mill Quality Management System (PQMS / MQMS) Manual</li> <li>b) PQMS / MQMS Standard Operating Manual and Procedures (SOP)</li> <li>c) Sustainable Plantation Management System (SPMS) Manual</li> <li>d) RSPO Supply Chain Manual</li> <li>e) ESH Management System Manual</li> <li>f) Occupational Safety and Health Manual</li> <li>g) Pictorial Safety Standards</li> <li>h) Laboratory Process Control Manual</li> <li>i) Security Guidelines.</li> </ul> <p>The Manuals are also kept in the administration office to facilitate reference by any interested parties.</p>
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	Kempas SOU 17 continued to implement the mechanism to ensure consistent implementation of operation as per SOPs. The mechanisms to check the implementation of procedures were carried out through RSPO internal audit report, Plantation Adviser's report and in addition, PMU team from HQ had conducted quarterly performance monitoring visit.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	Records of monitoring and the actions taken by the Kempas SOU 17 continued to be maintained. This is to ensure that the established procedures were consistently implemented. 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.
3.4 A comprehensive Social and Environmental Impact Assessment	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	YES	There are no new plantings or operations within SOU 17 Kempas. Nevertheless, a Social Impact Assessment (SIA) covering 5 operating units, namely Kempas Palm Oil Mill, Kempas Estate, Tangkah Estate, Kemuning Estate and Serkam Estate was carried out in Dec 2013 by the PSQM Unit of the Sime Darby Plantation. The process and findings were duly documented and sighted during the Recertification Audit.

Clause	Indicators	Comply Yes/No	Findings
(SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	any smallholder/outgrower scheme, is documented.		
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	YES	SOU 17 Kempas has separate Social Impact Assessment (SIA) and Environmental Impact Assessment reports. The SIA report covers 5 operating units, namely Kempas Palm Oil Mill, Kempas Estate, Tangkah Estate, Kemuning Estate and Serkam Estate was carried out in Dec 2013 by the PSQM Unit of the Sime Darby Plantation. SIA management and monitoring plans are also available for each unit within SOU 17 Kempas. There is evidence that the social management and monitoring plans were developed based on inputs received from external stakeholders during stakeholder meetings, union meetings, JCC meetings, and Gender Committee meetings. As for the Environmental management and monitoring plan for the mill and estate, it has implemented and regularly updated in the EAI & EIE reports for each, accordingly. Issues were appropriately discussed.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	YES	The social management and monitoring plans for each unit within SOU 17 Kempas are updated annually. It took into account issued raised in the stakeholder meeting, OSHA meetings, gender committee meetings, and meeting with worker representatives. The management plan for SIA (Replanting) 2019 identified areas of concerns, action plan, the person in charge, and completion date for implementation. This was discussed in a participatory way where questions were asked by workers and clarified by management. Workers raised their issues of concern, and were briefed on their payment rate, reminded to take adequate drinking water, and informed that rate per bunch will be displayed at muster ground and management to brief on the calculation.
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.	NO	Employment procedures for recruitment, selection, hiring, are documented. For locals, the procedures are in SOP on Hiring of Local workers. 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). For foreign worker, the employment procedures are contained in Standard Operating Process & Procedures (SOPP). However, it has been noted that there is no promotion procedure for local and foreign workers. The promotion procedure is only available for executives. Therefore, a Minor Non-Compliance No. RZ02 of 2020 was raised.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	Employment procedures are available. Evidence of implementation is obtainable from workers' files such as application form, interview, medical test and issuance of letter of offer.
3.6 An occupational health and safety (H&S) plan is	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	YES	Safety procedure has been established to assists CU related to implementation on i.e ESH compliance management. Among the objective of the procedure to ensure CU compliance with all the regulation and minimize the risk of noncompliance.

Clause	Indicators	Comply Yes/No	Findings	
documented, effectively communicated and implemented.	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	NO	The effectiveness of implementation health & safety plan has been monitored by daily basis. All the precaution i.e. safety signboard, pictorial safety standards, PPE, etc has been published and display at workplace areas (notice board, muster call, etc). CU also monitored safety risk in workplace operation by monthly basis. However, based on the workplace inspection document reviewed at Kemuning Estate (Kru Div) and crèche (Tangkah Estate-Kundong Div), it was found that there was no inspection for worker's quarters in term of broken roof and side floor and fencing around the creche. Therefore, major NCR raised as MAR 02 2020.	
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	YES	Formal training programmes for 2020 covered all aspects of the RSPO Principles and Criteria. Regular assessments of training needs were presented to auditors by the Kempas SOU 17. A training needs identification matrix has been established with target dates for the training to be conducted. The training program includes (not limited to):	
			1	ESH Legal & Other requirements
			2	Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000
			3	Accident Investigation Techniques
			4	Emergency Respond Plan Training (Chemical spill, poisoning, Fire. Lightning)
			5	First Aid Training
			6	Scheduled waste management
			7	Safe Work Procedure for All Stations.
			8	Confined Space Training
			9	Policy Training
			10	Effective workplace inspection
			11	GAP training / SW
			12	RSPO & Management Training,
			13	RSPO Human Right Training,
			14	Briefing on Sime Darby Policies (Gender & Conservation)
			15	Maintenance of spraying equipment
			16	HCV Training for Region
			17	Safe handling of Electrical Equipment
			18	MSDS/CSDS
			19	5 S Housekeeping
			20	PPE adherence
			21	Estate Activities / Mill Work stations
			22	Triple rinsing
			23	Effective work place inspection
			24	HIRARC
	25	Safe driving techniques		
3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	SOU Kempas had trained their staff, workers and smallholders and records of training were kept in the RSPO training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue were made available during audit.		

Clause	Indicators	Comply Yes/No	Findings
	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 in Apr & June 2019.

### **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
Definition Identity Preserved Mill D.1	A mill is deemed to be IP if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO P&C, or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.	YES	Kempas POM received only certified FFB from SOU Kempas i.e.Kempas, Kemuning, Tangkah and Serkam Estate from June 2019 onwards. During the P&C assessment, the audit team verified the volumes and osurces of certified FFB entering the mill, the implementation of processing controls and volumes sales of RSPO certified products. Refer to Table 3_IP for the relevant production data.
Definition Mass Balance Mill E.1	Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim	YES	Accordingly, SOU Kempas still received outside crops until May 2019. Refer to Table 3-MB for the relevant production data.



Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	only the volume of oil palm products produced from processing of the certified FFB as MB.		
Explanation (Volume and product integrity) D.2 E.2	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> <p>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).</p>	YES	<p>Projection data available as in Table 4 of this report.</p> <p>The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. Copy of Shipping Announcement was provided during the audit as evident of compliance to reporting requirement as listed by the standard.</p>
Documented procedures 5.3.1 D.3 E.3	<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> </ul>	YES	<p>Kempas POM had revised their documented procedure title 'Standard operating procedure for Sustainability Supply Chain and Traceability'. 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</p> <p>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.</p> <p>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</p> <p>Clause 7.0 ~ Receiving FFB at the mill – list of supply base, rules for determining diverted</p>



Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> <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>		<p>FFB destination, relevant record</p> <p>Clause 8.0 ~ Production of ISCC certified Waste/Residues – Follow SOP Separate Oil Recovery System</p> <p>Clause 9.0 ~ process monitoring – for IP model mill need to ensure no mixing of RSPO certified and non-certified</p> <p>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,</p> <p>Clause 11.0 ~ Non-conforming material / product – requirement to downgrade the RSPO Product</p> <p>Clause 12.0 ~ product claim – shall follow RSPO rules on market communication &amp; claim</p> <p>Clause 13.0 ~ Outsourced contractor - the mill has established list of outsourced contractor. Sighted list of transporter for CPO and PK.</p> <p>Clause 14.0 ~ Training – the mill shall provide training for relevant personnel carrying the task at tech critical control point (CCP).</p> <p>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.</p> <p>Clause 16.0 ~ Production volume</p> <p>Clause 17.0 ~ Conversion Factors</p> <p>Clause 18.0 ~ Internal Audit</p> <p>Clause 19.0 ~ Complaints</p> <p>Clause 20.0 ~ Management Review</p> <p>The Assistant Manager have overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Kempas POM. Interview with sustainability committee member, mill manager, assistant mill manager &amp; weighbridge operator was confirmed they are understood the supply chain requirements.</p>
Internal Audit 5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <p>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <ul style="list-style-type: none"> <li>Effectively implements and maintains the standard requirements within its</li> </ul>	YES	<p>Audit report has been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2017 requirements. The RSPO internal audit was conducted in Dec 2019 by the internal appointed auditor. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There were 2 Major nonconformance report (NCR) raised by auditor. All NCR has been closed. Audit documentation - Attendance sheet, audit plan, audit notes, was sighted by auditor.</p> <p>Management review meeting has been conducted in Jan 2020 (combine RSPO, RSPO SCCS and MSPO)</p>

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>organisation.</p> <ul style="list-style-type: none"> <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>Purchasing Goods In 5.4</p> <p>D.4.1/ D.4.2</p> <p>D.4.1/E.4.2</p>	<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>	YES	<p>KPOM had continued to receive certified FFBs from the CU's own supply bases as well as non-certified FFBs from outsiders. There were 4 supply bases (estates) sending certified FFBs to KPOM. They were Kempas Estate, Kemuning Estate, Tangkah Estate and Serkam Estate. The validity of the certificate of the supplier has been checked accordingly. There also a diversion from RSPO Certified SOU which is SOU Diamond Jubilee (certified unit).There was no non-certified FFB received based on the records.</p> <p>No projection of overproduction.</p> <p>The mechanism in place for handling non-conforming oil palm products and/or documents.</p>
<p>Outsourcing Activities 5.5</p>	<p>5.5.1 In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO SCCS. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the</p>	YES	<p>There are 1 outsource company CPO transporter i.e. agreement signed. 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 for transporter contractor was sighted by the auditor.</p>

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	management of the oil palm product(s) and instructions for tank movements are controlled by the certified organisation (not the tank farm manager).		
	<p>5.5.2 Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a) The site has legal ownership of all input material to be included in outsourced processes;</p> <p>b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</p>	YES	<p>a) 1 outsource company CPO transporter i.e. agreement signed.</p> <p>b) There is contract document between Kempas 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.</p> <p>c) The RSPO Supply Chain procedure has described on Para 13.0 Outsource Contractor and briefed to the contractor.</p> <p>d) Inspection was carried out as additional effort to ensure no contamination sighted book at AP Post.</p>

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	5.5.3 The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	YES	List of an updated contact person for both transporters were made available and up-to-date in the stakeholder list.
	5.5.4 The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	YES	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
Record keeping 5.9	5.9.1 The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO SCCS requirements.	YES	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up-to-date.
	5.9.2 Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	YES	Relevant record was maintained for more than 2 years as per Standard operating procedure for Sustainability Supply Chain and Traceability.
	5.9.3 The organisation shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of 12 months.	YES	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'.
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	YES	Kempas POM has maintained the Real Time basis accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK.
E.5.1	a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a	YES	Available for the period until May 2019.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>real-time basis and / or three-monthly basis.</p> <p>b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>The site can only deliver MB sales from a positive stock. Positive stock can include product ordered for delivery within 3 months. However, a site is allowed to sell short i.e. product can be sold before it is in stock.</p>		
Conversion Factors 5.10	5.10.2 Where applicable, a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organisations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ).	YES	Kempas POM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER). The OER & KER were monitored on daily & monthly basis by the mill using the prepared template to ensure their accuracy as well as monitoring of their ongoing performance.
	5.10.2 Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	YES	
Processing D.6	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport	YES	Global Trading & Marketing (GTM) office informed KPOM by e-mail on the dispatch of RSPO certified CPO/ PK to relevant buyer. The dispatch of the RSPO certified CPO/PK to buyer by Kempas POM were made based on a specific contract.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	and storage to strive for 100% separation.		
Sales and goods out 5.6	<p>5.6.1 The supplying site shall ensure that the following minimum info for RSPO certified products is made available in document form: The name and address of the buyer; The name and address of the seller;</p> <ul style="list-style-type: none"> <li>• The loading or shipment / delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number.</li> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT</li> </ul>	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 being complied by indicating in weighbridge dispatch ticket.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	platform per shipment or group of shipments.		
Registration of Transactions 5.7	5.7.1 Supply chain actors who: <ul style="list-style-type: none"> <li>are mills, traders, crushers and refineries; and</li> <li>take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	YES	The registration of transaction being carried out by Group Plantation Marketing subordinate using the RSPO Member ID.  Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in). The samples of shipping announcement had been verified during the audit.
	5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform.	YES	
	The declaration time to do Shipping Announcement / Announcement is based on members' own standard operating procedures. <b>Trace:</b> When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. <b>Remove:</b> RSPO certified volumes sold under other scheme or as conventional, or		

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	in case of underproduction, loss or damage shall be removed. <b>Confirm:</b> Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.		
Claims 5.11	5.11.1 The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications & Claims.	YES	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Kempas 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 CU 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.	NO	The Sime Darby Plantations Human Rights Charter is being revised as Sime Darby Plantations Human Rights Charter (revised 2019). Although paragraph 6.3 of the draft document provides for protection of Human Rights Defenders, whistle blowers, complainants and community spokespersons, this Charter remains in a draft stage and not finalised for implementation and communicated to all levels of the workforce, operations, FFB suppliers and local communities. None of the workers, security personnel, contractors and local communities are aware of the Policy prohibiting retaliation against HRDs. Therefore, a Major Non-Compliance No NCR No. RZ02 of 2020 was raised.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	There is no evidence that SOU 17 Kempas instigates any violence or use any form of harassment in its operations.
4.2 There is a mutually agreed and documented system for dealing with complaints and	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	NO	The system used by the SOU 17 Kempas in resolving disputes and grievances. The Mill and Estates within SOU 17 each have its own Internal Complaint Book and External Communication Book. The Internal Complaint Book was used for employees to lodge complaint pertaining to their houses, 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.



Clause	Indicators	Comply Yes/No	Findings
grievances, which is implemented and accepted by all affected parties.	requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.		However, the existing dispute and grievance procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Procedures for Handling Social Issues", did not contain provision that prohibit retaliation against Human Rights Defenders, community spokespersons and whistleblowers where requested. Therefore, a Major Non-Compliance No. RZ 04 of 2020 was raised.
	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. To ensure that illiterate parties also understand the procedures, verbal briefings are given are 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	It was evident that parties to a grievance are kept informed of the progress of the complaints.
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	YES	The conflict resolution mechanism includes options to access independent legal and technical advice.
4.3 The CU contributes to local sustainable dev. as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	YES	There is evidence that contributions to community development was provided based on consultations.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a FPIC process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	YES	Evidence of legal ownership of the land including history of land tenure was verified during this audit. For Tangkah Estate the land was previously owned by The Kundong Rubber Estate Limited, Tangkah Rubber Estate Limited and The Kundong Tanjong Pau Limited. The land was acquired during the merger between Golden Hope, Kumpulan Guthrie Berhad and Sime Darby in 2007. The Land Title was then transferred under the name of Sime Darby Plantation Berhad. While Kemuning Estate was originated from Sime Darby which was bought from Negeri Sembilan State Government. For Kempas Estate and Mill, was originated from Sime Darby which was bought from Melaka State Government. Each estate had legal use of the land through an Ownership signed by the Sultan of Johore and Director of Lands and Surveys of Negeri Sembilan and Melaka following the payment of premium and Land fee. The land titles sighted during audit.

Clause	Indicators	Comply Yes/No	Findings
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby since 1980. The audit team had confirmed that there were no land issues related to previous owners.
	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	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby since 1980. The audit team had confirmed that there were no land issues related to previous owners.
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby since 1980. The audit team had confirmed that there were no land issues related to previous owners.
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby since 1980. The audit team had confirmed that there were no land issues related to previous owners.
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Kempas since 1980. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.

Clause	Indicators	Comply Yes/No	Findings
	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 Kempas.
	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 Kempas
	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 Kempas
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 Kempas 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 Kempas since 1980. The audit team had confirmed that there were no land issues related to previous owners.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Kempas since 1980. 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.
	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	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 Kempas since 1980. 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
	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.		
	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 Kempas since 1980. 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.
	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 Kempas since 1980. 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.
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Kempas since 1980. 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.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	YES	There was no new lands acquired for plantation and mills after 15/11/2018. The current operation area including mill and estates as per stated in the land title.
4.6 Any negotiations concerning compensation for	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System document, entitled "Procedures for Handling Boundaries Disputes". In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land

Clause	Indicators	Comply Yes/No	Findings
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.			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 Kempas. The Fresh Fruit Bunches are supplied from SDPB owned estates which are certified to RSPO.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	YES	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are 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 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 regarding compensation (monetary or otherwise) with villagers, local community and neighbouring estate.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	It has been verified that the land is legitimately owned by Sime Darby SOU Kempas since 1980. 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
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	YES	It has been verified that the land is legitimately owned by Sime Darby SOU Kempas since 1980. 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.
	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 certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	YES	Land conflict is not present in the area of the unit of certification. It can be concluded based on the interviews carried out that there was no evidence of any land dispute at Kempas CU.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).	YES	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities where applicable).	YES	There was no conflict or dispute over the land.

**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	Since June 2019, Kempas Palm Oil Mill became an Identity Preserved Mill and therefore, only receives and processes FFB from its own internal sources. No FFB supplies received from smallholders, and therefore this Indicator is not applicable.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Yes	As mentioned in ind. 5.5.1, since June 2019, Kempas Palm Oil Mill became an Identity Preserved Mill and therefore, only receives and processes FFB from its own internal sources. No FFB supplies received from smallholders, and therefore this Indicator is not applicable.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	As mentioned in ind. 5.5.1, since June 2019, Kempas Palm Oil Mill became an Identity Preserved Mill and therefore, only receives and processes FFB from its own internal sources. No FFB supplies received from smallholders, and therefore this Indicator is not applicable.
	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	As mentioned in ind. 5.5.1, since June 2019, Kempas Palm Oil Mill became an Identity Preserved Mill and therefore, only receives and processes FFB from its own internal sources. No FFB supplies received from smallholders, and therefore this Indicator is not applicable.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	There is evidence that contracts entered into with FFB and CPO transporters are fair, legal and transparent. Among others, the contracts are dated, with clear provisions on contract duration, scope of services, payment of fee, obligation and undertaking of parties, provisions related to default and termination, rights and obligations upon termination, clause on dispute, etc. Annex 2 and 3 of the contracts specify schedule of transportation rates and transport rate adjustment mechanism, respectively. Based on the review of the contracts and letter of award, all the provisions contained therein are legal in nature. Contractors interviewed also confirmed that the contracts are fair, legal and transparent.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	Contracts with suppliers contain a provision that payments would be made within one month of invoice. It was evident during the conduct of audit.



Clause	Indicators	Comply Yes/No	Findings
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	Weighing Equipment in Kempas CU were properly calibrated.
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	YES	Sime Darby Plantation supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. However, in SOU Kempas, there is no third-party FFB sent to the mill. Noted that SOU Kempas has invited nearby smallholders to attend the Stakeholder meeting to promote RSPO certification. Sighted letter invitation to the smallholder.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	YES	A grievance mechanism which respects anonymity and protects complainants is in place at the SOU Kempas as per the SOM Procedure for External Communication and as per SOP Carta Aliran Pengendalian Isu Sosial.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	Yes	Since June 2019, Kempas Palm Oil Mill became an Identity Preserved Mill. Being an Identity Preserved Mill, Kempas Palm Oil Mill does not purchase FFB from smallholders, and no smallholders are in SOU 17 Kempas's supply base. Therefore, this indicator is not applicable. However, smallholders were invited to attend the stakeholder meeting for a briefing by SOU 17 Kempas on matters related to MSPO and RSPO certifications.
	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	As mentioned in ind. 5.2.1, since June 2019, Kempas Palm Oil Mill became an Identity Preserved Mill. Being an Identity Preserved Mill, Kempas Palm Oil Mill does not purchase FFB from smallholders, and no smallholders are in SOU 17 Kempas's supply base. Therefore, this indicator is not applicable. However, smallholders were invited to attend the stakeholder meeting for a briefing by SOU 17 Kempas on matters related to MSPO and RSPO certifications.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	As mentioned in ind. 5.2.1, since June 2019, Kempas Palm Oil Mill became an Identity Preserved Mill. Being an Identity Preserved Mill, Kempas Palm Oil Mill does not purchase FFB from smallholders, and no smallholders are in SOU 17 Kempas's supply base. Therefore, this indicator is not applicable. However, smallholders were invited to attend the stakeholder meeting for a briefing by SOU 17 Kempas on matters related to MSPO and RSPO certifications.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Yes	There are no Scheme Smallholders for SOU 17 Kempas, and therefore this Indicator is not applicable.



Clause	Indicators	Comply Yes/No	Findings
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Yes	As mentioned in ind. 5.2.1, since June 2019, Kempas Palm Oil Mill became an Identity Preserved Mill. Being an Identity Preserved Mill, Kempas Palm Oil Mill does not purchase FFB from smallholders, and no smallholders are in SOU 17 Kempas's supply base. Therefore, this indicator is not applicable. However, smallholders were invited to attend the stakeholder meeting for a briefing by SOU 17 Kempas on matters related to MSPO and RSPO certifications.

#### **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, which states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Social Policy was displayed on notice boards in both Bahasa Malaysia and English.
	6.1.2 (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.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	YES	Based on interviews with the estate and mill management including documentation review (interview assessment and medical report), recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness appropriate for the job. 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.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	YES	One pregnant worker who is working at the Mill weighbridge confirmed that the pregnancy testing was carried out on her own free will. Due to the nature of her job at the weighbridge and doesn't require contact with chemicals, there was no necessity for her to be accorded an alternative equivalent employment.

Clause	Indicators	Comply Yes/No	Findings
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	A gender committee is in place throughout all the production units within SOU 17 Kempas. 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.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	Equal opportunities policy contained within the Sime Darby Social Policy 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.
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	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 Employment Act (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. Workers interviewed confirmed that they understand their contracts were briefed to them by management officials before signing. They would also seek clarifications if they need further clarifications on their monthly pay slips.
	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.	YES	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, netpay. None of the workers have family members working to help them with their work.
	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	There is evidence that workers observe regular working hours including overtime hours within the legal confines of the Employment Act 1955. 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. 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. 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, Peninsular Malaysia.

Clause	Indicators	Comply Yes/No	Findings
	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	Evidence is available that the SOU 17 Kempas 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, and places of worship, sundry shops and an activity hall. There is evidence that housing inspection are being carried out once a week based on housing inspection records. 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.
	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. It was seen in the stores that the items are adequate, clearly labelled and within its expiry period. As the estates and mill are easily accessible to the nearest town, workers can also go out to the towns.
	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</li> </ul>	YES	All sampled workers receive at least minimum wages based on Minimum Wages Order 2018. The new Minimum Wages Order 2020 gazetted on 10 Jan 2020 and came into effect on 1 February 2020. Calculation of prevailing wages and in-kind benefits have also been carried out for SOU 17 Kempas certification unit. The benefits in-kind include medical treatment, free housing and amenities available, and are deemed reasonable.

Clause	Indicators	Comply Yes/No	Findings
	<p>stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage 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	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. 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.
	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 17 Kempas and NUPW representatives are available. 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	YES	Evidence is available that all worker representatives were freely appointed by the workers.

Clause	Indicators	Comply Yes/No	Findings
association and bargaining for all such personnel.	representatives for all workers including 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. 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 by SOU 17 Kempas.
	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 17 Kempas 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 Kempas Palm Oil Mill (6 Jan 2020), Tangkah Estate (24 Jan 2020), Kemuning Estate (13 Jan 2020), Kempas 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. 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.
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	YES	The policy to protect reproductive rights of women is contained in the Sime Darby Plantation Gender Policy. Based on interviews conducted and documents reviewed, there is evidence that the Policy is being implemented. Workers interviewed, especially women employees from all levels of the workforce confirmed their understanding of the Policy.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to	YES	There was no evidence of any new mothers and therefore this indicator could not be verified.

Clause	Indicators	Comply Yes/No	Findings
	address the needs that have been identified.		
	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.	NO	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. However, the grievance mechanism which respects anonymity and protects complainants have not been effectively communicated to all levels of workforce. 9 sampled workers and 1 executive at Tangkah Estate were not aware of the mechanism that the Company has which provides anonymity and protects complainants. Therefore, the grievance mechanism and provisions for whistleblowing have not been effectively communicated to all levels of workforce. Therefore, a Minor Non-Compliance NCR No. RZ 06 2020 was raised.
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.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	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.
6.7 The unit of certification ensures that the working environment under its control is safe and	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	YES	All the Estates / Mill Managers were appointed as the Chairman of the ESH committee. The Manager subsequently assigned duties of ESH coordinator to the Assistants or healthcare assistant for the down line implementation of ESH practices in the estates. All identified Executives were officially given a letter for such an appointment. All estates and the mill management conduct regular two-way communication with their employees through the quarterly ESH meeting.

Clause	Indicators	Comply Yes/No	Findings
without undue risk to health.	issues raised are recorded.		
	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.	NO	<p>Accident and emergency procedures are available in adherence to the SPSB policy on 'Crisis Management &amp; Emergency Response' plan and "Accident and Reporting and Investigation Procedure", in the same manual. Each estates and mill had procedures emergencies situation as listed below in the table. There were formation of ERP Team &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 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>However, during site visit at Kempas Estate (Merlimau and Main Div), First aid kit was not available at worksite (spraying and harvesting operation). Also, the Assigned operative was not trained for using of first aid kit at Tangkah Estate (Kundong Div). Minor NCR was raised i.e. RAR 01 2020.</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>Training and briefing on the operations were provided for workers to educate them on safe working practices. This is also made to ensure that the applicable precautions are adhered. Training for employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, Mill workers, harvesters, pruners, field workers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be used in a safe manner. Based on the HIRARC carried out at both estates and the mill the PPE types for the various activities were identified and recommended.</p>
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents	YES	<p>The Mill and Estates provide medical care and insurance coverage for all the workers. Local Workers and foreign workers – covered by SOCSO and FWCS. In addition, the estates and mill provide medical care to all workers using own Medical Assistant services. Cases requiring additional/serious treatment are referred to Hospital Jasin 30 km away.</p>



Clause	Indicators	Comply Yes/No	Findings
	leading to injury or sickness are covered in accordance with Malaysian law.		
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKPP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKPP 8 a mandatory requirement for submission to DOSH by Jan of the subsequent year. Cases if any are reviewed during safety meetings.

#### **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	Kempas SOU 17 continued to implement Integrated Pest Management (IPM) in the 4 estates and continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Agricultural Reference Manual (ARM) Section 15 -Plant Protection. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. 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. 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. All 4 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.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	Species referenced in the Global Invasive Species Database and CABI.org. were not used in managed areas of the 4 estates.
	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	Kempas SOU 17 continued to use the Sime Darby Plantation Berhad's policy of no open burning. As advocated, the 4 estates practised Zero burning thus no use of fire for pest control. In the 2017, 2018 and 2019 replants visited during the audit in the estates, it was evident that all palms were felled, shredded, windrowed and left to decompose.



Clause	Indicators	Comply Yes/No	Findings
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	Kempas SOU 17 continued to use agrochemicals based on its Agricultural Reference Manual (ARM) Section 15 and 16, SSOP and Pictorial Safety Standard Book (PSS) where written justifications had been provided for various fields operations. The Manual has included a chemical register list which indicates the use of selective products that are specific to the target 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	Kempas SOU 17 had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients applied per ha. Pesticides are used only when justified and areas used were recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. All the estates had documented programs for spraying pesticides and for rat baiting. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	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 reduce use of insecticides. 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.
	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 Kempas SOU 17 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.
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	YES	Kempas SOU 17 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.
	7.2.5a Judgment of the threat and	YES	As mentioned above in 7.2.5.of this check list and based on audit findings, there was no evidence of

Clause	Indicators	Comply Yes/No	Findings
	verify why this is a major threat.		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 Kempas SOU 17.
	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 Kempas SOU 17.
	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 Kempas SOU 17.
	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 Kempas SOU 17.
	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 .Kempas SOU 17.
	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 regular updates on the knowledge about the activity they carry out.	YES	Person who handled chemical such as spraying, and manuring has been given proper training by the CU and external bodies. This was evident during audit.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). Records of purchase, storage and use were maintained. All of the stores were equipped with exhaust fans and the door was secured and keys held by only the store keeper and attendant. Only authorized personnel are allowed to handle the chemicals. All chemicals were segregated and fertilisers were well stacked. Relevant

Clause	Indicators	Comply Yes/No	Findings
			MSDS/CSDS were available in the stores. Empty pesticides containers were triple rinsed, holes punched in them and stored separately in the scheduled wastes store awaiting proper disposal.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	Among the identified wastes were the empty agrochemical containers that include pesticides containers. Empty pesticides containers were triple-rinsed at washing station prior to storage and disposal. Disposal was to a recycle company.
	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	All Estates of SOU 17, continued to use the SDPB's management strategy in place for planting on slopes and to minimise and control erosion and degradation of soils. The strategy in place for buffer zones protection in Slope & River Protection Policy – Buffer Zone & 25° slope. It was observed that practices to minimise and control erosion and degradation of soils was also advocated through proper stacking of fronds, EFB application, avoidance of blanket spraying.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	The medical surveillances for pesticide operators were carried out accordingly. All the workers involved in chemical handling were fit and in normal condition.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	YES	All estates complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation whereby no work with pesticides is given to pregnant or breast-feeding women. <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.
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	Waste management and disposal plan maintained as documented in the Waste Management Plan, which among others contain information to avoid or reduce pollution. The plan observed implemented accordingly.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by	YES	At Kempas Estate and Kempas POM domestic waste has been disposed based on procedure "Scheduled Wastes (Hazardous Waste) Management".

Clause	Indicators	Comply Yes/No	Findings
	workers and managers, is demonstrated.		
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit at Kempas SOU, 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	Kempas 17 SOU practised the maintenance of long-term soil fertility by annual application of fertilizers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and EFB, POME and compost application, water management and by maintaining soft weeds within interlines.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	Kempas 17 SOU continued to monitor their fertilizer inputs as recommended by their Principal Agronomist, Plant Nutrition & Protection, Central West Region, based in Tanah Merah Estate. The soil analysis provided the indication of soil health and monitor the changes in the organic carbon and total nitrogen. Soil sampling were carried out on a 5 year cycle basis.
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	YES	All the 4 Estates, Kempas Estate, Kemuning Estate, Tangkah Estate and Serkam Estate continued to have a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose and EFB, compost and POME were also applied.
	7.4.4 Records of fertiliser inputs are maintained.	YES	Kempas SOU 17 continued to monitor their fertilizer inputs as recommended by their Principal Agronomist, Plant Nutrition & Protection, Central West Region, based in Tanah Merah Estate. 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.

Clause	Indicators	Comply Yes/No	Findings																																																																																							
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	During the field visit and the soil maps provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in Kempas SOU 17. As per the Soil Maps the soil series were as follows:																																																																																							
			Kempas Estate	Kemuning Estate	Tangkah Estate	Serkam Estate	Bungor	Batu Anam	Bungor	Bungor	Gajah Mati	Bungor	Durian	Jerangau	Holyrood	Bungor/Kedah Shallow	Durian Shallow	Local Alluvium I	Jeram	Colluvium I	Jerangau	Local Alluvium II	Kg Kubur	Colluvium I I	Klau/Bungor	Rengam	Local Alluvium I	Durian	Local Alluvium I	Gajah Mati	Local Alluvium I I	Gajah Mati	Malacca	Munchong	Munchong	Jitra	Malacca Very Shallow	Serdang	Organic Clay	Local Alluvium	Local Alluvium II	Chat	Muck	Malacca	Organic Clay	Malacca	Tavy	Munchong	Kelau	Pohoi	Rengam	Munchong Shallow	Rengam	Malacca/Tavy	Serdang	Older Alluvium	Serdang/Munchong		Seremban	Padang Besar	Sungai Buloh			Prang	Tampin			Rengam	Tavy Shallow			Rengam Shallow	Unclassified			Sungai Buloh/Holyrood				Tavy				Tebok				Unclassified		
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				7.5.2 No replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	Kempas SOU 17 had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. It was observed that no replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the SOU.																																																																																				
				7.5.3 There is no new planting of oil palm on steep terrain.		Kempas SOU 17 had a management strategy for planting on slopes to minimise and control erosion and 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	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	Kempas SOU 17 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 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 Kempas SOU 17.																																																																																				

Clause	Indicators	Comply Yes/No	Findings
new plantings, and the results are incorporated into plans and operations.	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	There were no marginal and fragile soils in the 4 estates.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	Kempas SOU 17 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 Kempas.
	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 Kempas CU 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 minimised.	YES	It has been confirmed that Kempas CU 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.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	It has been confirmed that Kempas CU 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	YES	It has been confirmed that Kempas CU 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
	<p>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.</p> <p>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.</p>		
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	YES	It has been confirmed that Kempas CU 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.
	7.7.7 (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	YES	It has been confirmed that Kempas CU 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
	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.		
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	YES	All estates had in place and implemented water management plans. Plans for 2020 were sighted. The water management plans were tailored towards how to reduce rain water collection, to improve user awareness and domestic use.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	Based on stakeholder consultation with local communities and field visit, there was evidence that the CU does not restrict access to clean water or contribute to pollution of water used by communities.
	7.8.1b Workers have adequate access to clean water.	YES	As verified at SOU facilities for workers and through interview with workers, all workers have obtained adequate access to clean water via Syarikat Air Melaka Berhad (SAMB), Syarikat Air Negeri Sembilan and Syarikat Air Johor (SAJ).
	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	During site visit at Tangkah Estate, treated drinking water has been carried out by monthly basis to identified E.Coli and Total Coliform for river water analysis has been carried out 3 monthly basis. Latest analysis has been carried by Sime Darby Research Sdn- R&D Centre –Downstream.
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand	YES	Final discharge analyst complied and quarterly report submitted to DOE.



Clause	Indicators	Comply Yes/No	Findings																																																	
	(BOD), is regularly monitored.																																																			
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Mill management has reviewed and updated the plan by yearly basis. Sighted the record an evidence water consumption for FFB processing by monthly basis.																																																	
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	Plan for efficiency of the use of fossil fuel and to optimise renewable energy was available in the Environmental Management Plan 2020. Among of non-renewable energy has been monitored and documented such as Electricity, Diesel and Fiber & Shell.																																																	
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	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 publicly reported.	YES	<p>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 (data as table below). CU also submitted GHG foot print report to the RSPO and RSPO annual communication of progress (ACOP) (publicly available report) -:</p> <p><a href="https://rspo.org/members/acop/search?name=sime+darby+&amp;member_type=&amp;acopyear=">https://rspo.org/members/acop/search?name=sime+darby+&amp;member_type=&amp;acopyear=</a></p> <p><u>Summary of Net GHG Emissions</u></p> <table><tr><td>Emissions per Product</td><td>tCO2e/tProduct</td><td>Extraction</td><td>%</td></tr><tr><td>CPO</td><td>0.47</td><td>OER</td><td>20.66</td></tr><tr><td>PK</td><td>0.47</td><td>KER</td><td>4.7</td></tr></table> <p></p> <table><tr><td>Land Use</td><td>Ha</td></tr><tr><td>OP planted area</td><td>30425.90</td></tr><tr><td>OP planted on peat</td><td>0</td></tr><tr><td>Conservation (forested)</td><td>0</td></tr><tr><td>Conservation (non-forested)</td><td>0</td></tr><tr><td>Total</td><td>30425.90</td></tr></table> <p></p> <p><u>Summary of Field Emissions and Sinks</u></p> <table><tr><td></td><td colspan="2">Own Crop</td><td colspan="2">Group</td></tr><tr><td></td><td>tCO2e</td><td>tCO2e/tFFB</td><td>tCO2e</td><td>tCO2e/tFFB</td></tr><tr><td>Emissions</td><td></td><td></td><td></td><td></td></tr><tr><td>Land Conversion</td><td>99176.07</td><td>0.48</td><td>10393.03</td><td>0.40</td></tr><tr><td>*CO2 Emissions from Fertiliser</td><td>11084.68</td><td>0.05</td><td>1267.84</td><td>0.05</td></tr></table>	Emissions per Product	tCO2e/tProduct	Extraction	%	CPO	0.47	OER	20.66	PK	0.47	KER	4.7	Land Use	Ha	OP planted area	30425.90	OP planted on peat	0	Conservation (forested)	0	Conservation (non-forested)	0	Total	30425.90		Own Crop		Group			tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB	Emissions					Land Conversion	99176.07	0.48	10393.03	0.40	*CO2 Emissions from Fertiliser	11084.68	0.05	1267.84	0.05
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	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 Kempas CU. 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	YES	SOU Kempas maintained its documented identified wastes and sources of pollution in Waste Management Plan. The Waste Management Plan among others contains information pertaining to mitigate and control the identified wastes and source of pollution.																																																																					

Clause	Indicators	Comply Yes/No	Findings
	implemented and monitored.		<p>Among 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 of processing stations (hydrocyclone / claybath /sterilizer condensate/clarification) and boiler blowdown.</li> <li>Land – Source from generation of solid wastes, including scheduled wastes, domestic waste and industrial/process wastes</li> </ul>
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	Kempas SOU 17 continued to use Sime Darby Plantation Berhad's policy of no open burning. As advocated, all the 4 estates practised Zero burning. In the 2017, 2018 and 2019 replants visited during the audit in the 4 estates, it was evident that all palms were felled, shredded, windrowed and left to decompose.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	Kempas SOU 17 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	Kempas SOU 17 had also established the fire prevention and control measures with adjacent stakeholders through stakeholder meeting and fire drill.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	YES	No new land clearing since Nov 2015 available at SOU Kempas, thus this Indicator was not Applicable.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	SOU Kempas has reviewed their HCV with new assessment conducted in February 2014 Report was reported in April 2015. This new HCV assessment titled is 'HCV Re-Assessment For Strategic Operating Unit (SOU 17 – Kempas) which included both the planted area and relevant wider

Clause	Indicators	Comply Yes/No	Findings
protected or enhanced.	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	YES	landscape-level considerations with villages and forest reserved. For Serkam Estate, HCV Re - Assessment has been conduct on April 2017 titled HCV Re-Assessment For Strategic Operating Unit (SOU 18 – Diamond Jubilee). The total area of HCV area for SOU Kempas is 47.79 ha HCV area.
	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.	YES	No new land clearing. Auditor also verify through records that SOU Kempas always updated regarding their HCV to their stakeholder during stakeholder meeting even though the HCV in SOU Kempas doesn't affect them.
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).	YES	Progress of implementation of the action plans 'Environmental Management Plan FY: 2020 Objectives & Target – for All Estate were reviewed and verified on the ground. The action Plan contains monitoring requirements and updated every year and already consult with stakeholder during stakeholder meeting. Some of action highlighted in the plan are: <ul style="list-style-type: none"> <li>- Planted the Signage</li> <li>- Continuous monitoring</li> <li>- Training</li> <li>- Rehabilitation Buffer zones by planting a beneficial plant</li> <li>- meeting with Government bodies/authorities Department.</li> </ul>

Clause	Indicators	Comply Yes/No	Findings
	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 was done on April 2015. 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	Although there was no RTE species found in the CU, SOU Kempas still conduct programme to regularly educate the workforce about the status of RTE species in Malaysia.
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	YES	Progress of implementation of the action plans 'Environmental Management Plan FY: 2020 Objectives & Target – for All Estate were reviewed and verified on the ground. No RTE species were found within the estates area. Noted the CU had continued to implement planned actions such as awareness to the staffs and public on enhancing biodiversity, posting of relevant information in the Sime Darby webpage and erection of signage at strategically locations. The outcomes of monitoring will be feedback into the next year action plan.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November	YES	Not applicable since there is no new land clearing

Clause	Indicators	Comply Yes/No	Findings
	2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.		

### 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></p> <p><b>PT Sandika Natapalma &amp; PT Budidaya Agro Lestari</b> Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing. As at June 2017, the smallholders with the total of 29,914 Ha (58% from the total Ha, 51,715 Ha) of associated smallholders in Indonesia has been certified. Certification process for the remaining associated smallholder's areas was on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and out growers by end 2020.</p> <p><b>PT Bersama Sejahtera Sakti</b> The new project at KKPA Maju Bersama by the plasma community is currently in nursery stage and not yet due for harvesting, the year of planting was in 2014.</p> <p><b>PT Ladang Rumpun Subu Rubadi</b> SAP 1 Estate PLASMA will be undergone 2<sup>nd</sup> stage audit on 2019.</p> <p><b>PT Guthrie Pecconina</b> Sungai Jernih Estate and the KKPA Estates has undergone audit.</p> <p><b>PT Sime Indo Agro</b> Only East estate not yet certified – land legalization still in progress.</p>

				<p><b><u>Liberia</u></b> SDPL has undergone RSPO Main Certification audit scheduled on 19 to 23/3/2018, but the assessment was only completed conducted and put on-hold due to security &amp; safety issue. After due consideration on the current engagement with the House of Representative in Liberia, SDP management decided to postpone the time bound plan of RSPO Certification to 2019 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process. A letter of Request for Extension of RSPO Certification Time Bound Plan for Sime Darby Plantation dated 22/5/2019 was sent to RSPO Secretariat, Head of Certification, and with response to Sime Darby Plantation on 23/5/2019 with no objections on the extension.</p> <p><b><u>Papua New Guinea (NBPOL)</u></b> Markham Farming Company Limited (MFCL) / Markham Agro Pte. Ltd. Estimate to be certified on year 2020. The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore, the Remediation and Compensation Procedure will be required to be full filled in order to achieve certification. The Disclosure has been has been initiated on 18.10.18. Currently HCV/HCS, SEIA and LUCA are being undertaken in order to submit and mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration. <a href="https://rspo.org/certification/remediation-and-compensation/racp-tracker">https://rspo.org/certification/remediation-and-compensation/racp-tracker</a> no 82</p>
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	YES	Time bound plan was verified by CB and it can be confirmed that there were several changes to the current time bound plan as verified during this audit. Liberia has receive and extension of Timebound Plan which is until 2020 and PT Mitra Austral Sejahtera has been sold to PT Inti Nusa Sejahtera <a href="#">Refer letter dated 27/6/2019 to RSPO Secretariat and announcement at Bursa Malaysia</a> <a href="http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965">http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965</a> .
	(c)	Any revision to the	YES	Time bound plan was verified by CB and it can be confirmed that there were several changes to the

		time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);		current time bound plan as verified during this audit. Liberia has receive and extension of Timebound Plan which is until 2020 and PT Mitra Austral Sejahtera has been sold to PT Inti Nusa Sejahtera <a href="http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965">Refer letter dated 27/6/2019 to RSPO Secretariat and announcement at Bursa Malaysia http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965</a> .
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	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



		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;		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 <a href="http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965">Refer letter dated 27 June 2019 to RSPO Secretariat and announcement at Bursa Malaysia http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965</a>
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	YES	Based on the internal audit report, there were no labour dispute that were not being resolved yet through an agreed process for all uncertified units for all 7 uncertified units of Sime Darby Plantation Sdn Bhd - Indonesia as at June 2019.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	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	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 ben noted that as at June 2019, PT Mitra Austral Sejahtera was sold to PT Inti Nusa Sejahtera. <a href="http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965">Refer letter dated 27/6/2019 to RSPO Secretariat and announcement at Bursa Malaysia http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965</a>

		compliance shall be based on the following approach:					
		<ul style="list-style-type: none"> <li>A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement;</li> </ul>	YES	#	Name of SOU	Name of Units	Positive assurance statement and self-assessment
				1	PT Sime Indo Agro	East Sei Mawang	Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor
				2	PT Ladang Rumpun Subur abadi	Subur Abadi Plasma 1	Internal assessment has been conducted for Subur Abadi Plasma 1 on 22/2/2017. 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=00P9000001OioXOEAZ">https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioXOEAZ</a>
				5	PT Guthrie Pecconina Indonesia	Sungai Jernih Estate and GPI KKPA	Sungai Jernih Estate and GPI KKPA were audited by Mutuagung as verified through Recertification Audit report. The assessment was conducted on 15 – 20/5/2017.
				6	PT Sandika	Karya Palma	Internal assessment was conducted on 10/2/2017.

				7	Nata Palma PT Budidaya Agro Lestari	KKPA SNP Pelanjau (PT BAL) Sungai Putih (PT BAL) Beturus (PT BAL) KKPA BAL	Internal assessment was conducted on 18 – 23/9/2016. This PT also has conducted Stage 1 audit on RSPO Certification System, P&C RSPO (2016) and RSPO Supply Chain Certification Standard on 17 – 22/4/2017.  Smallholder project – targeted for certification by 2020.
		<ul style="list-style-type: none"> <li>Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.</li> </ul>	YES	Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report.			
		<ul style="list-style-type: none"> <li>Desktop study e.g. web check on relevant complaints</li> </ul>	YES	It was evident that in handling uncertified management unit, SDP engaged with TuK-Indonesia and continued to work on direct engagement with PAC in order to achieve the consensus with the PAC to address all unresolved issues.			
		<ul style="list-style-type: none"> <li>If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.</li> </ul>	YES	Further information can be obtained from <a href="https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail">https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail</a> . However, Sighted as at June 2019 PT Mitra Austral Sejahtera has been sold to PT Inti Nusa Sejahtera <a href="#">Refer letter dated 27/6/2019 to RSPO Secretariat and announcement at Bursa Malaysia</a> <a href="http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965">http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965</a>			
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	YES	As it has been mentioned in 2.2.1 of this checklist, The Land Title for All Estate has been verified, for all estates. The Land Title was under the name of Sime Darby Plantation Bhd. Each estate had legal use of the land through Lands and Surveys Department following the payment of premium and Land fee. Based on this, it has been confirmed that there was no such case concerning the rights of local communities or indigenous people in the SOU.			

their free, prior and informed consent and check compliance with the specific terms of such agreements.				
<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
1.1.5 RZ 01 2020	Minor	<p>Finding: Stakeholder lists of Kempas Palm Oil Mill, Kempas Estate, Kemuning Estate and Serkam Estate do not have complete information on stakeholders and the stakeholders' nominated representatives.</p> <p>Objective evidence:</p> <ol style="list-style-type: none"> <li>1. The stakeholder list of Kempas Palm Oil Mill does not contain details of Indonesian and Nepal Embassies despite employing workers from those countries.</li> <li>2. The stakeholder list of Serkam Estate does not contain details of Bangladesh High Commission and Nepal Embassy despite employing workers from those countries.</li> <li>3. The stakeholder list of Kemuning Estate does not contain details of Indian and Bangladesh High Commissioners, Indonesian and Nepal Embassies despite employing workers from those countries.</li> <li>4. The stakeholder lists of Kempas Palm Oil Mill, Kempas, Kemuning and Serkam Estates do not contain details of contractors, vendors, suppliers, and local authorities' nominated representatives.</li> </ol>	<p>The stakeholder list is updated to contain the details of the embassies, contractor/vendor/supplier/local authorities and its nominatives representative.</p> <p>PIC will update and maintain the list of stakeholder regularly.</p>	<p>Corrective action plan was accepted by assessor.</p> <p><b>Status: Open. Will be verify the implementation and effectiveness during next audit.</b></p>
3.5.1 RZ 02 2020	Minor	<p>Finding: The procedures for promotion is not available for workers.</p> <p>Objective Evidence: Employment procedures for promotion is only available for executives and not the local &amp; foreign workers.</p>	<p>HR region has communicated with HR Headquarter on 18th February 2020 to establish the procedure. HR Headquarters will discuss with GSQM department on this.</p> <p>The finalized procedure by Group HR will be disseminated to region level for implementation.</p> <p>Completion Date: December 2020.</p>	<p>Corrective action plan was accepted by assessor.</p> <p><b>Status: Open. Will be verify the implementation and effectiveness during next audit.</b></p>
4.1.1 RZ 03 2020	Major	<p>Finding: Sime Darby Plantations Berhad does not have a documented policy that prohibits retaliation</p>	<p>The Group has established a specific Policy on Human Right Defenders,</p>	<p>Auditor received the policy on the protection of Human Right Defenders dated</p>

		<p>against Human Rights Defenders.</p> <p>Objective Evidence:</p> <p>Sime Darby Plantations Berhad's Human Rights Charter (revised 2019) provides for protection of Human Rights Defenders, whistle blowers, complainants and community spokespersons. However, this Policy is still in a draft stage and yet to be finalized, implemented and communicated to all levels of the workforce, operations, FFB suppliers and local communities.</p>	<p>Whistleblowers and Complainants and the the Policy had been finalised by GSQM on 25 March 2020.</p> <p>The Policy had communicated via briefing session to Estate level, FFB Suppliers and local community in 29 April 2020.</p>	<p>25 March 2020. It was evident that the training was done on 29 April 2020.</p> <p><b>Status: Closed</b></p>
4.2.1 RZ 04 2020	Major	<p>Finding: The dispute and grievance procedure does not prohibit retaliation against Human Rights Defenders, community spokespersons and whistleblowers where requested.</p> <p>Objective Evidence:</p> <p>There existing dispute and grievance procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Procedures for handling Social Issues" dated 1 November 2008 does not prohibit retaliation against Human Rights Defenders, community spokespersons and whistleblowers where requested.</p>	<p>In the Policy on the Protection of Human Rights Defenders (HRDs), it is stated in Section 1.4 that implementation of HRDs shall be in accordance with SDP Whistleblowing Policy, The Group Policies &amp; Authorities (GPA) No. B5 WHISTLEBLOWING POLICY dated 29 AUGUST 2019 has covers on the oversight and responsibilities, reporting process, protection to HRD and whistleblowers confidentiality. Section 7&amp;8 has outlined on the "No retaliation "and "Protection" of HRD &amp; whistleblower respectively.</p> <p>The procedure is communicated via briefing session to Estate level and to inform through letter/ email to stakeholders such as FFB transporters and local community in April 2020.</p>	<p>Auditor has received copy of The Group Policies &amp; 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 the Protection of Human Rights Defenders (HRDs).</p> <p><b>Status: Closed</b></p>
6.5.4 RZ 05 2020	Minor	<p>Finding: The grievance mechanism which respects anonymity and protects complainants have not been effectively communicated to all levels of workforce.</p> <p>Objective Evidence:</p> <p>9 sampled workers and 1 executive at Tangkah Estate were not aware of the mechanism that the Company has which provides anonymity and protects complainants. Therefore, the grievance mechanism and provisions for whistleblowing have not been effectively communicated to all levels of workforce.</p>	<p>1) Retraining on COBC and whistleblowing have been conducted to workers on 17/02/2020.</p> <p>2) The executive and staff have attended training on COBC and whistleblowing on 22nd and 24th February 2020</p> <p>To conduct yearly training and refresher training on whistleblowing to all employee.</p>	<p>Corrective action plan was accepted by assessor.</p> <p><b>Status: Open. Will be verify the implementation and effectiveness during next audit.</b></p>
2.1.3 MAR 01 2020	Minor	<p>Finding: Legal or authorised boundaries are not clearly demarcated and visibly maintained.</p>	<p>Pegging have been erected along the estate boundaries and identified in map.</p>	<p>Corrective action plan was accepted by assessor.</p>

		Objective evidence: Based on site visit at Kemuning Estate (Kru Div), there was not clearly authorized boundaries demarcated between Kru Div and small grower.	(Map has been provided).  Management will maintain the identified pegging at the boundary marker by having maps with GPS location of each boundary pegging.	<b>Status: Open. Will be verify the implementation and effectiveness during next audit.</b>
3.6.2 MAR 02 2020	Major	Finding: Safety risks has not been monitored for worker's quarters (Kemuning Estate-Kru Div) and crèche (Tangkah Estate-Kundong Div). Objective evidence: Based on workplace inspection document reviewed at Kemuning Estate (Kru Div) and crèche (Tangkah Estate-Kundong Div), there was no inspection for worker's quarters in term of broken roof and side floor and fencing around the creche.	i)The necessary parts have been purchased and the repairing work is in progress. ii)Housing inspection checklist have been revised. iii)To use the revised checklist/form for future inspection.	Auditor has received revised inspection checklist which insert on broken roof and floor.  <b>Status: Closed</b>
6.7.2 RAR 01 2020	Minor	Finding : i) First aid kit was not available at worksite at Kempas Estate (Merlimau and Main Div). ii) Assigned operative was not trained for using of first aid kit at Tangkah Estate (Kundong Div). Objective evidence : i) During site visit at Kempas Estate, first aid boxes was not available at spraying and harvesting operation. ii) Based on site visit and documentation review, no evidence of the assigned operative for first aid were attend the training.	Enhacement of the supervision especially field staff to supervise first aid box keep by mandor. To extend first aid training to other operator (head gang).	Corrective action plan was accepted by assessor.  <b>Status: Open. Will be verify the implementation and effectiveness during next audit.</b>

**STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED**

<b>P &amp; C Indicator</b>	<b>Specification Major/Minor</b>	<b>Detail Non-conformances</b>	<b>Verification by Assessor</b>
2.1.2 MRS 01 2019	Minor	<p>Finding : Certain amendment of applicable legal yet to be updated in the legal register.</p> <p>Objective evidence :</p> <p>The legal register at Kempas POM was reviewed on 1/10/17, Kempas Estate on 11/12/2018, Kemuning Estate on 2/1/2019 and Tangkah Estate on 13/1/2019. However, certain applicable legal requirement yet to be updated in the legal register as listed below:</p> <p>1.Children and Young Person (Amendment) Act 2010</p> <p>2.Land Acquisition Act (Amendment) 2016</p>	<p>The documented system for ensuring legal compliance exists in the form of Legal and Other Requirements Register (LORR) File 2 (F23) no QSHE/O4/5.2.4.</p> <p>SOU 17 Kempas have identified, documented and maintained their LORR with written information on legal requirements which related to their operations. The LORR for SOU 17 were updated in February 2020 and compiles relevant laws and regulations and this includes the recently gazetted Minimum Wages Order 2020, Employment Act 1955, Personal Data Protection Act 2010, Employees Provident Fund Act 1951, Employees Social Security Act 1969, Passport Act 1966, Trade Unions Act 1959, Children &amp; Young Person (Employment) (Amendment) 2018, Land Acquisition Act (Amendment) 2016, etc.</p> <p><b>Status: Closed</b></p>
4.4.2 STK 02 2019	Major	<p>Finding :. Protection of water courses as per SDPB SPMS: Appendix Standard Operating Procedure For Water Quality Monitoring – Issue 1/06/2016 was not complied with.</p> <p>Objective evidence :</p> <p>Tangkah Estate Kundong Division – there are 3 natural water ways from which water is flowing out the division but no water analysis have been conducted.</p>	<p>Kundong Division, Tangkah Estate has collected water samples (K1, K2 and K3) on 14 February 2019. Pesticide in water analysis and industrial effluent (water) analysis results for Kundong Div. dated 4/3/2019 and 6/3/2019 were received.</p> <p>Training on water and waste water quality monitoring has been conducted on 25/2/2019.</p> <p><b>Status: Closed</b></p>
4.7.3 STK 01 2019	Major	<p>Findings:</p> <p>1. Not all appropriate protective equipment was used by workers at the place of work.</p> <p>2. Vehicles were not maintained as per Item 7.1.3.3. of SOP 'Transportation System &amp; machinery Safety, OSH procedure Doc:SD/SDP/PEQM(ESH)/201/0517.</p> <p>Objective evidence:</p> <p>1. Workers using Zenoah Blowers for circle raking in Field 1993 on Kempas Estate, Workers</p>	<p>The Kempas Estate has issued PPE for workers using Zenoah blowers on 31/1/2019. Training on PPE was conducted on 4/2/2019.</p> <p>Bolts and nuts is fixed to the tractor TM55 and TM24-2. Daily inspection to tractors will be recorded in the Service Logbook</p> <p>Purchase order for replacement of seat tractor has been issued on 12/2/2019.</p> <p>Kemuning Estate had carried out daily inspection for both tractors</p>



		<p>carrying out spraying in Field 2013B on Kemuning Estate were not using the appropriate PPE.</p> <p>2. (i)Kempas Estate: Bolt and nuts were missing – Tractor TM55 1 each from the left &amp; right rear wheels and 1 from left wheel of trailer. Tractor TM24 – 2 each from both front wheels.</p> <p>(ii)Kemuning Estate: Tractor BKF – Driver's seat rusty and not well secured to the tractor &amp; hydraulic oil leaking and Tractor BJDD7736 – Diesel fuel leaking.</p>	<p>(BKF 8726 &amp; BJD 7736) as verified through daily inspection checklist. Both tractors in good condition.</p> <p><b>Status: Closed</b></p>
5.6.3 HO1	Minor	<p>Finding: The above requirement pertaining regular reporting on progress of GHG emissions from estate and mill operations not conformed.</p> <p>Objective evidence: Regular reporting on progress of GHG emissions from estate and mill operations is yet to evidence.</p>	<p>Reporting GHG as per indicator 7.10.1.</p> <p><b>Status: Closed</b></p>
6.1.4 MZK 01 2019	Minor	<p>Finding : Impacts of replanting at Kempas Estate (Main Division) and Tangkah Estate (Ayer Panas Division) were not taken into account when reviewing the Social Impact Assessment Plans.</p> <p>Objective evidence: The Social Management Plans carried out by Kempas Estate and Tangkah Estate did not take into account the impacts of ongoing replanting activities on affected parties.</p>	<p>SIA management and monitoring plans are also available for each unit within SOU 17 Kempas. There is evidence that the social management and monitoring plans were developed based on inputs received from external stakeholders during stakeholder meetings, union meetings, JCC meetings, and Gender Committee meetings. Among the issues considered with the stakeholders included:</p> <p>a. Kempas Estate on 7 Jan 2020 discussed with the affected harvesters the impact of replanting;</p> <p><b>Status: Closed</b></p>
8.1.1 HO2	Minor	<p>Finding: There are operations / situations observed require improvement plan to mitigate negative impact to environment.</p> <p>Objective evidence: Kemuning Estate: Oil spillage observed outside of workshop; no method to mitigate of potential fall (spill) of stacked chemicals in Chemical Store. Kempas Estate: Oil spillage observed outside of workshop. Tangkah Estate: Potential of wastewater from vehicle cleaning and workshop floor cleaning flow onto soil ground.</p>	<p>During site visit at all estates, chemical and lubricant was placed at the designated store and workshop with proper oil trap, bund, tray, etc to prevent negative impact to environment.</p> <p><b>Status: Closed</b></p>

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

Financial year (July – June)	Targeted	Achieved/Status	Attachments
Jun-08	5 SOUs	<p><b>Achievement of Timebound Plan</b></p> <p>Sime Darby Plantation has had all its SOUs (Malaysian &amp; Indonesian) completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2011, all Malaysian SOUs have been RSPO certified (with the exception of 2 new oil mills commissioned to replace the current oil mills after the initial timebound plan targets).</p> <p>97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes. Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. A new mill in Liberia is planned to be commissioned.</p> <p>Note: Time-bound plan to achieve 100% RSPO certification has shifted to 2015 .</p>	<p>For details please refer to Attachments:</p> <p>i) SDP - RSPO Certification Status for Malaysia Operations</p> <p>ii) SDP- RSPO Certification Status for Indonesia Operations</p> <p>iii) Updates on PT MAS</p> <p>iii) RSPO SCCS status for Sime Darby Plantation (Downstream Operations)</p>
2008/2009	20 SOUs (from Malaysia and Indonesia)		
2009/2010	20 SOUs (from Malaysia and Indonesia)		
2010/2011 (End Dec 2011)	17 SOUs (from Malaysia and Indonesia)		

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

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

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

**SDP - RSPO Certification Status for Malaysia Operations**

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

19	Pagoh	Muar, Johor	28/1/2014	27-Jan-24	RSPO 600305	Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	NA	
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-20	RSPO 548299	
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042	
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	SGS-RSPO/PM-00715, 824 502 16040, BVC-RSPO20170623-01	
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	NA	
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-23	RSPO 537872	
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-20	RSPO 001	
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-20	RSPO 002	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-20	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	
32	Rajawali	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819167, RSPO 0020	
33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	
34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-815150, MUTU-RSPO/054	Mill is mothballed, supply base merged into Lavang effective Dec 2017.

**SDP- RSPO Certification Status for Indonesia Operations**

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

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

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



**SDP - 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				
		Outgrowers – West Zone				
		Outgrowers – Central Zone				
		Outgrowers – MBA East Zone				
		Outgrowers – MBE East Zone				
2	Milne Bay Estates (MBE)	Hagita Oil Mill	NA	Milne Bay Province, Papua New Guinea	Certified	15-Feb-18
		Giligili Estate				
		Waigani Estate				
		Sagarai Estate				
		Padipadi Estate				
		Mariawatte Estate				
		East Gurney Estate				
		West Gurney Estate				
		East Sagarai Estate				
		West Sagarai Estate				
3	Poliamba (POL)	Poliamba Oil Mill	NA	New Ireland Province, Papua New Guinea	Certified	19-Mar-12
		Kara Estate				

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

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

		Ove Estate				
		Tamare Estate				
7	Markham Farming Company Limited (MFCL) / Markham Agro Pte. Ltd.	Munum Estate	Sep-20	Markham Farms,	RaCP	<p>The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore the Remediation and Compensation Procedure will be required to be fulfilled in order to achieve certification.</p> <p>The Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEJIA and LUCA are being undertaken in order to submit and mitigation and remediation plan to RSPO.</p> <p>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>
		Erap Estate	Sep-20		RaCP	

**SDP - RSPO Certification for Time Bound Plan - Liberia Operations**

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