



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

File Ref.: ES10171014

**RSPO PUBLIC SUMMARY REPORT**

**CLIENT : SIME DARBY PLANTATION BERHAD – SOU 32 RAJAWALI**

**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 / Supply Base	GPS Location		Location
		Latitude	Longitude	
SOU 32 Rajawali	Rajawali Palm Oil Mill	N 3° 22' 14.4"	E 113° 24' 1.1"	97011 Bintulu, Sarawak
	Rajawali Estate	N 3.42595°	E 113.37900°	97008 Bintulu, Sarawak
	Samudera Estate	N 3° 28' 55.0"	E 113° 23' 51.0"	97012 Bintulu, Sarawak
	Semarak Estate	N 3.22536°	E 113.35600°	97011 Bintulu, Sarawak
	Bayu Estate	N 3° 28' 56.0"	E 113° 23' 51.0"	97012 Bintulu, Sarawak

**MAP :** See Attachment 1

**AUDIT DATE :** 14-17 October 2019

**DURATION :** 20.0 auditor days

**TYPE OF AUDIT :** ☒ Annual Surveillance Audit No. 03 ☐ Recertification Audit

**STANDARD :** RSPO PRINCIPLE & CRITERIA MYNI 2014, AND RSPO SUPPLY CHAIN CERTIFICATION STANDARD 2014 (REVISED 14 JUNE 2017)

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

**VALIDITY OF RSPO CERTIFICATE :** 30/12/2016 – 29/12/2021

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

Non-conformity Report(s) ☐

List of additional site(s) ☐

**Report by Audit Team Leader**

Name : MOHD ZULFAKAR KAMARUZAMAN

Signature :

Date : 15/1/2020

**Acknowledgement by Client's Representative**

Name : SIME DARBY PLANTATION (SARAWAK) SDN BHD  
(Company No. 179365-M)

Signature :   
SALWA MD. YAZID  
Assistant Manager SQM  
Sarawak Region

Date : 20/1/20

## RSPO PUBLIC SUMMARY REPORT

### SUMMARY OF AUDITS

Stage 2 audit / Recertification audit				
On-site audit date	:	19th – 23rd September 2016	No. of auditor days	: 13.5 Auditor days
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Jagathesan a/l Supiah, Selvasingam T. Kandiah,		
No. of major NCR	:	-	Indicator: -	Closing date : -
No. of minor NCR	:	5	Indicator: 4.1.2, 4.1.3, 4.8.2, 5.2.3, 5.2.4	
Indicate the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers
	:	√		√
	:	Contract workers	NGOs	Govt. agency
	:			Independent growers
	:	Indigenous people	Contractor	Others (Please specify)
	:		√	
Supply base sampled	:	Semarak & Samudera Estate		
Report approved by	:	Aminah Ang	Approval date : 20/12/2016	

Annual Surveillance Audit 1				
On-site audit date	:	9-13 Oct 2017	No. of auditor days	: 13.5 Auditor days
Audit team	:	Rozaimee Ab Rahman (TLA), Mohd Zulfakar Kamaruzaman, Hazani Othman		
No. of major NCR	:	3	Indicator: 2.1.1, 4.4.2 & 4.5.3 (certification system)	Closing date :12/12/17
No. of minor NCR	:	2	Indicator: 2.1.3, 4.6.10	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers
	:	√		√
	:	Contract workers	NGOs	Govt. agency
	:			Independent growers
	:	Indigenous people	Contractor	Others (Please specify)
	:		√	
Supply base sampled	:	Rajawali & Bayu Estate		
Changes since the last audit	:	No change.		
Report approved by	:	Radziah Mohd. Daud	Approval date : 16/01/2018	

Annual Surveillance Audit 2				
On-site audit date	:	18 – 21/9/2018 & 9 -10/10/2018	No. of auditor days	: 13.5 Auditor days
Audit team	:	Selvasingam T. Kandiah (TLA), Rozaimee Ab Rahman, Hazani Othman, Amir B Bahari		
No. of major NCR	:	2	Indicator: 4.7.3 & 6.5.1	Closing date : 28/12/2018
No. of minor NCR	:	1	Indicator : 4.1.2	
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	:	Rajawali, Samudera, Semarak & Bayu Estates		
Changes since the last audit	:	No change.		
Justification of audit planning	:	Total allocation of audit man day for SOU Rajawali were: <ul style="list-style-type: none"> <li>Rajawali POM = 4 auditor days (total workers 120, for safety and health, environment, mill best practices, GHG verification, etc with 1 day for supply chain certification systems)</li> <li>Rajawali, Samudera, Semarak &amp; Bayu Estate = 3 auditor days for each estates (monitoring on critical areas such as buffer zone areas, boundary forest reserve, neighbouring villagers, stakeholder, etc. verified safety and health, environment, good agriculture best practices, GHG verification, etc)</li> </ul>		
Report approved by	:	Radziah Mohd Daud	Approval date : 31/12/2018	

## RSPO PUBLIC SUMMARY REPORT

Annual Surveillance Audit 3				
On-site audit date	: 14-17 October 2019	No. of auditor days	: 20.0 Auditor Days	
Audit team	: Mohd Zulfakar Kamaruzaman (Lead), Mohd Ab Raouf Asis, Rozaimée Ab Rahman, Selvasingam T. Kandiah, Mohd Norddin Abd Jalil			
No. of major NCR	: 1	Indicator: 4.1.2 (Recurrence Minor)	Closing date : 8/01/2020	
No. of minor NCR	: -	Indicator : -		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities	Suppliers
	X		X	X
	Contract workers	NGOs	Govt. agency	Independent growers
				X
	Indigenous people	Contractor	Others (Please specify)	
	X	X		
Supply base sampled	: Rajawali, Samudera, Semarak & Bayu Estates			
Changes since the last audit	: No change.			
Justification of audit planning	Total allocation of audit man day for SOU Rajawali were: <ul style="list-style-type: none"> <li>Rajawali POM = 4 auditor days (total workers 120, for safety and health, environment, mill best practices, GHG verification, etc with 1 day for supply chain certification systems)</li> <li>Rajawali, Samudera, Semarak &amp; Bayu Estate = 4 auditor days for each estates (monitoring on critical areas such as buffer zone areas, boundary forest reserve, neighbouring villagers, stakeholder, etc. verified safety and health, environment, good agriculture best practices, GHG verification, etc)</li> </ul>			
Report approved by	: Kamini Sooriamorthy		Approval date : 15/01/2020	

Annual Surveillance Audit 4				
On-site audit date	:	No. of auditor days		
Audit team	:			
No. of major NCR	:	Indicator:	Closing date :	
No. of minor NCR	:	Indicator :		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities	Suppliers
	Contract workers	NGOs	Govt. agency	Independent growers
	Indigenous people	Contractors	Others (Please specify)	
Supply base sampled	:			
Changes since the last audit	:			
Justification of audit planning	:			
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
<b>Projection Period</b>	Sept 2016 – Aug 2017	Oct 2017 – Sept 2018	Oct 2018 – Sept 2019	Oct 2019 – Sept 2020	
<b>Certified FFB Processed (MT)</b>	174,801.72	175,617.77	149,129.74	149,242.00	
<b>Production of Certified CPO (MT)</b>	38,456.37	44,785.82	33,554.19	35,469.00	
<b>Production of Certified PK (MT)</b>	8,225.39	8,679.21	7,158.23	8,243.00	
<b>Certified Areas (Ha)</b>	14,493.00	*14,315.01	*14,315.01	**14,104.45	
<b>Planted Areas (Ha)</b>	9,851.22	9,851.22	9,851.22	9,790.52	
<b>Production Areas (Ha)</b>	8,676.65	7,961.55	7,331.75	7,198.83	
<b>HCV Areas (Ha)</b>	-	-	**275.40	**275.40	
<b>REMARKS</b>	<p>*177.99 ha certified area has been taken (from 2016 data) by the government to construct Pan Borneo highway and BDA project.</p> <p>**210.56 ha certified area has been taken by the government to construct Pan Borneo highway and BDA project.</p> <p>***The reported areas was determined based on the latest re-assessment; the “High Conservation Value (HCV) Final Report (Version 2.0)”, dated in June 2017.</p>				

TABLE 2

	PO	PK
<b>Last years certified volume (MT)</b>	33,554.19	7,158.23
<b>Last years actual certified sold (MT)</b>	2,600.00	3,450.00
<b>Last years actual sold under other schemes (MT)</b>	0.00	0.00
<b>Last years sold conventional (MT)</b>	25,396.14	3,058.67
<b>New year certified volume (MT)</b>	35,469.00	8,243.00

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## **1.0 AUDIT PROCESS**

### **1.1 Certification Body**

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

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

### **1.2 Qualification of audit team**

<b>Member of the Audit Team</b>	<b>Role/area of RSPO requirements</b>	<b>Qualifications</b>
Mohd Zulfakar Kamaruzaman	Lead Auditor / HCV, Social (Mill), Land Title & Supply Chain	Holds a B.Sc. Forestry from University Putra Malaysia. He had more than 4 years of working experience in the oil palm operation.
Selvasingam T Kandiah	Auditor / Safety and Environment (Estate)	Holds a B. Sc (Hons) in Agriculture. He had worked as a planter with Kumpulan Guthrie Berhad before retiring. He has 28 years of experience including 1 year in Liberia and 2 years in Estate Department of Kumpulan Guthrie.
Rozaimie Ab Rahman	Auditor / Health & Safety, Environment (Mill), GHG and Time Bound Plan	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.
Mohd Ab Raouf Asis	Auditor / Social (Estate)	Obtained qualification in B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM in 2007. He has been in the plantation industry for 7 years assisting Estate Manager managing palm oil estates. He has been trained as RSPO as well as MSPO auditor.
Mohd Nordin Abdul Jalil	Auditor / Good Agriculture Practice	Holds B.Sc. Agriculture (weed management) and had more than 35 years of working experience in plantation management covering rubber and oil palm.

### **1.3 Audit methodology**

The audit covered Rajawali palm oil mill and 4 of its supply base. The sampling of the number of the supply base was using the formula of  $0.8\sqrt{y}$ , however, as the site are more than 4, all site shall be covered. The 4 supply base covered during the audit are Rajawali Estate estate, Samudera Estate, Semarak Estate and Bayu Estate. The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

#### 1.4 Stakeholder Consultation

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

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<p>The following were confirmed during the conduct of audit as there was no evidence to prove otherwise:</p> <ul style="list-style-type: none"> <li>▪ All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in English/Bahasa as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer.</li> <li>▪ They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime.</li> <li>▪ They have been getting salaries above RM1,100 since January 2019. Salaries were paid before the 7th of every month.</li> <li>▪ No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment.</li> <li>▪ No discrimination between migrant workers and local workers, between male and female workers.</li> <li>▪ Comfortable housing with water and electricity provided. Local workers choose to stay in their houses in the nearby villages.</li> <li>▪ Have access to affordable food from the canteen/sundry shops within the estate/mill premises.</li> <li>▪ Entitled to free medical facilities at the estate clinic.</li> <li>▪ Have representatives who attend regular meetings with the management where they can put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects.</li> <li>▪ They knew the types of work offered at mill &amp; estate when they were in their own countries.</li> <li>▪ All migrant workers keep their own passports.</li> </ul>
2) Settlers	Not applicable.
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> <li>▪ Interviewed local communities Representative from neighbouring village. No new land dispute and no issues with SOU Rajawali.</li> </ul>
4) Suppliers	<ul style="list-style-type: none"> <li>▪ Fair dealings with the SOU.</li> <li>▪ Payments are made within 1 months of invoice.</li> </ul>
5) Contract workers	Not available for this audit.
6) Local & national NGOs	<p>It was noted that the company; Sime Darby Plantation (SDP) has received a feedback from one of the NGOs i.e. Sept 2019, claiming that one of SDP's CUs i.e. Derawan, was involved in deforestation and land clearing. The locked coordinate was reported to be at 3.406, 113.361.</p> <p>Upon internal investigation, SDP has confirmed that the land cleared was actually at the location of 3.353, 113.390; approximately a 100m away from the Rajawali estate boundary. This issue was further verified by the audit team during the conduct of onsite</p>

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	<p>audit at Rajawali CU as follows:</p> <ul style="list-style-type: none"> <li>▪ Auditor has verified on the ground based on coordinate received.</li> <li>▪ It was confirmed that cleared area was not in the area of Derawan CU but the location is just near to Rajawali Estate boundary.</li> <li>▪ It was confirmed that neither deforestation nor land clearing occurred within Derawan CU and Rajawali CU.</li> <li>▪ Based on interview with the land owner and onsite observation, the area in discussion was cleared and planted with durian orchard by land owner, themselves.</li> </ul>
7) Government agencies / Statutory bodies	▪ No social issues, harmonious co-existence.
8) Independent growers / Smallholders	▪ There was no third-party FFBs sent to the mill. No contract involved with smallholder.
9) Indigenous people	▪ Interviewed local communities Representative from neighbouring village. No new land dispute and no issues with SOU Rajawali.
10) Contractor	<ul style="list-style-type: none"> <li>▪ Several companies contacted and interviewed and they have been providing services to the SOU between 2 and 5 years period.</li> <li>▪ Signed a contract and understands contractual obligations and the need to comply with legal requirements.</li> <li>▪ Fair dealings with the SOU.</li> <li>▪ Payments are made within 1 months of invoice.</li> <li>▪ The mill and estate staff will verify the work done before his invoice can be approved for payment.</li> <li>▪ Signing of contract was with HQ. Contract terms are clear and fair. Renewal of contract is via tender system.</li> <li>▪ Knows about minimum wages and workers are paid accordingly and make statutory contributions such as EPF and SESCO.</li> <li>▪ Terms and conditions are clear and fair.</li> </ul>
11) Previous land owner (if any)	Refer to Indicator 2.2.1
12) Others (please specify)	Not applicable.

1.5 Audit plan : Refer to Attachment 2

1.6 Date of next audit : The next surveillance audit will be conducted within 12 months but not sooner than 9 months from this audit.

## 2.0 SCOPE OF CERTIFICATION AUDIT

### 2.1 Description of the certification unit

The Rajawali Certification Unit (CU) is one of the the Strategic Operating Unit (SOU) of Sime Darby Plantation Berhad. (SDP). The CU is also known as SOU 32 and consisted of Rajawali Palm Oil Mill (RPOM), Rajawali Estate, Samudera Estate, Semarak Estate and Bayu Estate. The CU is located about 100km from Bintulu town and is accessible via the Bintulu-Miri Road. Rajawali POM commenced its operations in 1993 with a processing capacity of 60 metric tonnes of FFB per hour. The total combined land area of the four estates is 14,104.45 hectares (Ha) of which 9,790.52 Ha had been planted with oil palm. All the estates within the CU have been fully developed before the year of 2005. Hence, Principle 7 of the RSPO P&C is therefore not applicable. The CU has MSPO certification.



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

The FFB is sourced from the company's own estates that were certified. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

**Table 1: Actual FFB production by the supply base for the last reporting period  
(Oct 2018 – Sept 2019)**

Own Estates	FFB Contribution		Certifying CB
	Tonnes	Percentage (%)	
Rajawali Estate	42,242.33	29.21	SIRIM
Semarak Estate	26,766.64	18.51	SIRIM
Samudera Estate	34,717.14	24.0	SIRIM
Bayu Estate	36,049.61	24.93	SIRIM
Damai Estate	2,364.28	1.64	SIRIM
Sahua Estate	2,090.27	1.44	SIRIM
Derawan Estate	233.59	0.16	SIRIM
Takau Estate	128.66	0.1	SIRIM
Rasan Estate	7.89	0.01	SIRIM
<b>Total</b>	<b>144,600.41</b>	<b>100</b>	

**Table 2: Projected FFB production by supply base for the next reporting period  
(Oct 2019 – Sept 2020)**

CU own estates	FFB Contribution	
	Tonnes	Percentage (%)
Rajawali	47,000	31.49
Samudera	37,626	25.22
Semarak	31,616	21.18
Bayu	33,000	22.11
<b>Total</b>	<b>149,242.00</b>	<b>100</b>

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**Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period  
(Oct 2018 – Sept 2019)**

RSPO Supply Chain Model : Identity Preserved	Total (MT)
FFB Received	144,600.41
FFB Processed	144,326.27
CPO Production	28,155.91
PK Production	6,626.10
CPO delivered as RSPO certified	2,600.00
CPO delivered under other scheme	0.00
CPO delivered as non-RSPO certified	25,396.14
PK delivered as RSPO certified	3,450.00
PK delivered under other scheme	0.00
PK delivered as non-RSPO certified	3,058.67
Credits traded through Books and Claim	0.00

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

RSPO Supply Chain Model : Identity Preserved	Total (MT)
FFB Received	149,242.00
FFB Processed	149,242.00
Certified CPO Production	35,469.00
Certified CPO delivered as RSPO	35,469.00
Certified CPO delivered as non-RSPO	0.00
Certified PK Production	8,243.00
Certified PK delivered as RSPO	8,243.00
Certified PK delivered as non-RSPO	0.00

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

Estate	Planted (ha)	Certified (ha)
Rajawali	3,374.71	6,087.27
Samudera	2,050.38	3,308.60
Semarak	2,241.76	2,248.68
Bayu	2,123.67	2,459.90
<b>Total</b>	9,790.52	14,104.45

Table 6 Planting profile summary for the CU

<u>Estate</u>	<u>Year of establishment</u>	<u>Mature (Ha)</u>	<u>Immature (Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Rajawali Estate	1993	2440.82	933.89	3374.71	72.00	28.00
Samudera Estate	1995	1667.07	383.32	2050.38	82.08	17.92
Semarak Estate	1990	1481.51	760.25	2241.76	66.09	33.91
Bayu Estate	1996	1609.43	514.24	2123.67	75.79	24.21
<b>Total</b>		<b>7198.83</b>	<b>2591.69</b>	<b>9790.52</b>	<b>73.53</b>	<b>26.47</b>

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Table 7: Planting profile for Rajawali Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2018	2 <sup>nd</sup>	Immature	346.25	10.26
2017	2 <sup>nd</sup>	Immature	239.45	7.10
2016	2 <sup>nd</sup>	Immature	194.83	5.77
2015	2 <sup>nd</sup>	Mature	188.19	5.58
2015	2 <sup>nd</sup>	Mature	101.40	3.00
2014	2 <sup>nd</sup>	Mature	210.12	6.23
2013	2 <sup>nd</sup>	Mature	206.32	6.11
2004	1 <sup>st</sup>	Mature	56.56	1.68
2003	1 <sup>st</sup>	Mature	41.60	1.23
2002	1 <sup>st</sup>	Mature	39.68	1.18
2000	1 <sup>st</sup>	Mature	85.76	2.54
1997	1 <sup>st</sup>	Mature	354.47	10.50
1996	1 <sup>st</sup>	Mature	1114.32	33.02
1995	1 <sup>st</sup>	Mature	195.76	5.80
<b>Total</b>			<b>3,374.71</b>	<b>100</b>

Table 8: Planting profile for Semarak Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2019	2 <sup>nd</sup>	Immature	106.17	4.74
2018	2 <sup>nd</sup>	Immature	291.98	13.02
2017	2 <sup>nd</sup>	Immature	176.61	7.88
2016	2 <sup>nd</sup>	Immature	185.49	8.27
2016	2 <sup>nd</sup>	Mature	189.90	8.47
2004	1 <sup>st</sup>	Mature	107.50	4.80
1996	1 <sup>st</sup>	Mature	153.19	6.83
1995	1 <sup>st</sup>	Mature	194.58	8.68
1994	1 <sup>st</sup>	Mature	591.23	26.37
1993	1 <sup>st</sup>	Mature	245.11	10.93
<b>Total</b>			<b>2,241.76</b>	<b>100</b>

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Table 8: Planting profile for Samudera Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1998	1 <sup>st</sup>	Mature	570.38	27.82
1999	1 <sup>st</sup>	Mature	214.46	10.46
2000	1 <sup>st</sup>	Mature	824.09	40.19
2016	2 <sup>nd</sup>	Immature	145.72	7.11
2017	2 <sup>nd</sup>	Immature	106.55	5.20
2018	2 <sup>nd</sup>	Immature	189.18	9.23
<b>Total</b>			<b>2,050.38</b>	<b>100</b>

Table 9: Planting profile for Bayu Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2000	1st cycle	Mature	969.07	45.63
1999	1st cycle	Mature	299.65	14.11
2006	1st cycle	Mature	6.9	0.32
2008	2nd cycle	Mature	5.5	0.26
2010	2nd cycle	Mature	15.08	0.71
1998	1st cycle	Mature	313.23	14.75
2017	2nd cycle	Immature	33.88	1.6
2018	2nd cycle	Immature	409.14	19.27
2020	2nd cycle	Immature	71.22	3.35
<b>Total</b>			<b>2123.67</b>	<b>100</b>

### 2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

Name	:	Salwa Md. Yazid
Position	:	Manager, SQM Sarawak Region
Address	:	Sime Darby Regional Office, Rajawali Complex, P.O.Box 673, KM52, Bintulu-Miri Road, 97008, Bintulu Sarawak
Phone no.	:	019-3800533
Fax no.	:	-
Email	:	salwa.yazid@sime-darbyplantation.com

### 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 in accordance to the production since last assessment.

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

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

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

Sime Darby Plantation – Indonesian Operations is in progress to certify all 7 SOUs from 2019 to 2020 as verified through the Time Bound Plan. The SOUs are PT Sime Indo Agro, PT Ladangrumpun Subur Abadi, PT Bersama Sejahtera Sakti, PT Bahari Gembira Ria, PT Guthrie Pecconina Indonesia, PT Sandika Nata Palma & PT Budidaya Agro Lestari.

- ii. Are there any changes to the organization's time bound plan? ☒ Yes ☐ No

If yes, comment in terms of acceptance or non acceptance on the changes in the time-bound plan?

The time bound plan for Sime Darby Plantation Sdn Bhd, updated as at June 2019 is provided in Attachment 7 of this report.

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

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

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

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

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

The new contact person is Salwa Md Yazid. SDPB will be changing its Financial year from July to June to Calendar Year effective January 2019.

- 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)

It has been noted that the company received a feedback from one of the NGOs with regards to deforestation/land clearing. Details provided in section 1.4 of this report – Stakeholder Consultation.

**4.0 DETAILS OF NON-CONFORMITY REPORT**

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

Total no. of minor NCR(s)  
(details refer to Attachment 4 )      List : 0

Total no. of major NCR(s)  
(details refer to Attachment 4 )      List : 1      MN01/2019

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

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

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

**5.0 AUDIT CONCLUSION**

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

## RSPO PUBLIC SUMMARY REPORT

### 6.0 RECOMMENDATION

☐

No NCR recorded. Recommended to continue certification.

☐

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

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

☒

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

☒

Recommended to continue certification.

☐

Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.

*Note: Major NCRs which are not addressed within a further 60 days shall result in the certificate being withdrawn.*

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

Audit Team Leader :

MOHD ZULFAKAR  
KAMARUZAMAN

(Name)



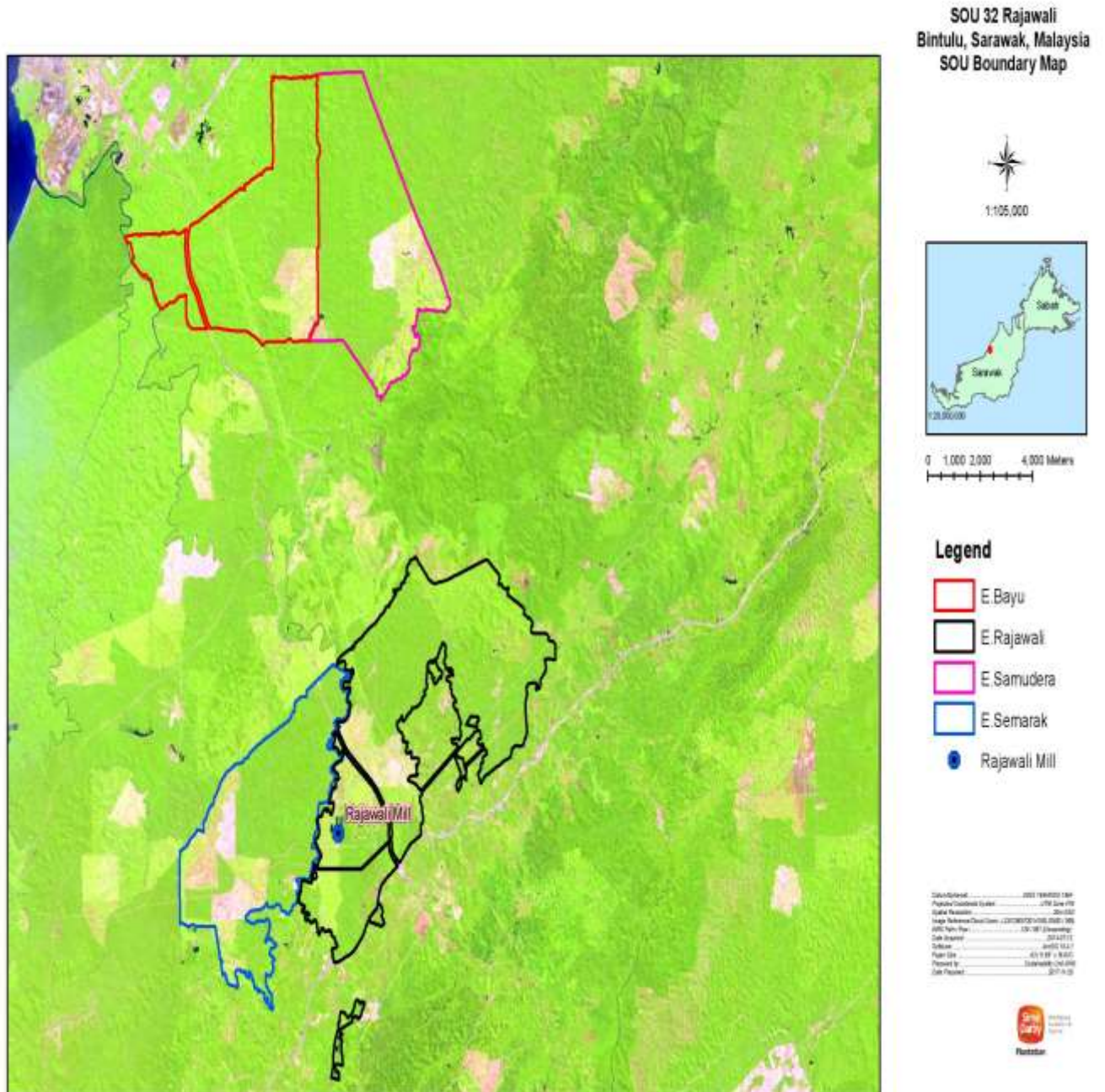
(Signature)

8/1/2020

(Date)

Attachment 1

Location map of Rajawali Certification Unit, Bintulu





### RSPO Surveillance Audit Plan

#### 1. Objectives

The objectives of the audit are as follows:

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

2. **Date of assessment** : 14-17 October 2019

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

- Rajawali Palm Oil Mill
- Rajawali Estate
- Samudera Estate
- Semarak Estate
- Bayu Estate

#### 4. Reference Standard:

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

#### 5. Assessment Team

- a) Lead Auditor : Mohd Zulfakar Kamaruzaman (Social Mill, SC, HCV)
- b) Auditors : Mohd Norddin Abd Jalil (GAP)
- : Rozaimiee Ab Rahman (Safety Mill, Env Mill, TBP)
- : Selvasingam T. Kandiah (Safety Estate, Env Estate)
- : Mohd Ab Raouf Asis (Social Estate, Land Title)

*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.

Recurring major non-compliances on the same indicator in successive surveillance audits will automatically lead to immediate suspension of the certificate. The suspension shall be lifted when the non-compliances are successfully addressed.

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

#### 9. Confidentiality Requirements

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

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

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

## RSPO PUBLIC SUMMARY REPORT

### 11. Reporting

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

### 12. Facilities Required

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

### 13. Assessment Programme Details : As below

## RSPO PUBLIC SUMMARY REPORT

Date / Time	Coverage of assessment / Activity / Site	STK	MZK	RAR	MAR	MNAJ
Day 1-14/10/19 8.30am – 9.15am	Opening Meeting – Venue: Rajawali POM <ul style="list-style-type: none"> <li>Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes</li> <li>Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases. Time bound plan, actions taken to address previous audit findings.</li> </ul>	/	/	/	/	/
9.15am – 12.30pm	<b>Site observation to Rajawali POM</b> <b>P1, P2, P3, P4, P5, P6, P7, P8</b> <ul style="list-style-type: none"> <li>Environment, Occupational safety &amp; health aspects, chemical management</li> <li>HCV &amp; Environment management</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>Environment, Occupational safety &amp; health aspects, chemical management</li> <li>Waste Management</li> <li>Land titles and user rights</li> <li>Laws and regulations</li> <li>Interview with workers, contractors etc.</li> <li>Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the mill</li> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc</li> </ul> <b>RSPO Supply Chain 2017</b> <ul style="list-style-type: none"> <li>RSPO Supply chain standard implementation including model requirements</li> </ul> <b>Site observation to Rajawali Estate</b> <b>P1, P2, P3,P4,P5, P6, P7,P8</b> <ul style="list-style-type: none"> <li>Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching,</li> <li>IPM</li> <li>New planting</li> <li>Environment, Occupational safety &amp; health aspects, chemical management</li> <li>HCV &amp; Environment management</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>Environment, Occupational safety &amp; health aspects, chemical management</li> <li>Waste Management</li> <li>Land titles and user rights</li> <li>Laws and regulations</li> <li>Interview with workers, contractors etc.</li> <li>Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the mill</li> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc</li> </ul>			/		
12.30pm – 1.30pm	Lunch Break					
1.30pm – 5.00pm	Continue assessment at respective sites	/	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	STK	MZK	RAR	MAR	MNAJ
Day 2 – 15/10/19 8.30am – 12.30pm	<b>Site observation to Bayu Estate</b> <b>P1, P2, P3,P4,P5, P6, P7,P8</b> <ul style="list-style-type: none"> <li>Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching,</li> <li>IPM</li> </ul>	/				/

## RSPO PUBLIC SUMMARY REPORT

	<ul style="list-style-type: none"> <li>New planting</li> <li>Environment, Occupational safety &amp; health aspects, chemical management</li> <li>HCV &amp; Environment management</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>Environment, Occupational safety &amp; health aspects, chemical management</li> <li>Waste Management</li> <li>Land titles and user rights</li> <li>Laws and regulations</li> <li>Interview with workers, contractors etc.</li> <li>Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the mill</li> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc</li> </ul>				/	
	<b>Site observation to Rajawali POM</b> <b>P1, P2, P3, P4, P5, P6, P7, P8</b> <ul style="list-style-type: none"> <li>Environment, Occupational safety &amp; health aspects, chemical management</li> <li>HCV &amp; Environment management</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>Environment, Occupational safety &amp; health aspects, chemical management</li> <li>Waste Management</li> <li>Land titles and user rights</li> <li>Laws and regulations</li> <li>Interview with workers, contractors etc.</li> <li>Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the mill</li> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc</li> </ul>		/	/		
12.30pm – 1.30pm	Lunch Break					
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/	/
<b>Date / Time</b>	<b>Coverage of assessment / Activity / Site</b>	<b>STK</b>	<b>MZK</b>	<b>RAR</b>	<b>MAR</b>	<b>MNAJ</b>
Day 3 – 16/10/19 8.30am – 12.30pm	<b>Site observation to Samudera Estate</b> <b>P1, P2, P3,P4,P5, P6, P7,P8</b> <ul style="list-style-type: none"> <li>Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching,</li> <li>IPM</li> <li>New planting</li> <li>Environment, Occupational safety &amp; health aspects, chemical management</li> <li>HCV &amp; Environment management</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>Environment, Occupational safety &amp; health aspects, chemical management</li> <li>Waste Management</li> <li>Land titles and user rights</li> <li>Laws and regulations</li> <li>Interview with workers, contractors etc.</li> <li>Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the mill</li> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc</li> </ul>	/			/	/
	<b>Site observation to Samudera Estate</b> <b>P1, P2, P3,P4,P5, P6, P7,P8</b>		/	/		

## RSPO PUBLIC SUMMARY REPORT

	<ul style="list-style-type: none"> <li>New planting</li> <li>Environment, Occupational safety &amp; health aspects, chemical management</li> <li>HCV &amp; Environment management</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>Environment, Occupational safety &amp; health aspects, chemical management</li> <li>Waste Management</li> <li>Laws and regulations</li> <li>Interview with workers, contractors etc.</li> <li>Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the mill</li> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc</li> </ul>					
12.30pm – 1.30pm	Lunch Break					
1.30pm – 5.00pm	<b>Site observation to Bayu Estate</b> <b>P1, P2, P3,P4,P5,P6,P7,P8</b> <ul style="list-style-type: none"> <li>New planting</li> <li>Environment, Occupational safety &amp; health aspects, chemical management</li> <li>HCV &amp; Environment management</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>Environment, Occupational safety &amp; health aspects, chemical management</li> <li>Waste Management</li> <li>Laws and regulations</li> <li>Interview with workers, contractors etc.</li> <li>Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the mill</li> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc</li> </ul>		/	/		
1.30pm – 5.00pm	Continue assessment at respective site	/			/	/
Date / Time	Coverage of assessment / Activity / Site	STK	MZK	RAR	MAR	MNAJ
Day 4 – 17/10/19 8.30am 12.30pm	<b>Site observation to Semarak Estate</b> <b>P1, P2, P3,P4,P5, P6, P7,P8</b> <ul style="list-style-type: none"> <li>Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching,</li> <li>IPM</li> <li>New planting</li> <li>Environment, Occupational safety &amp; health aspects, chemical management</li> <li>HCV &amp; Environment management</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>Environment, Occupational safety &amp; health aspects, chemical management</li> <li>Waste Management</li> <li>Land titles and user rights</li> <li>Laws and regulations</li> <li>Interview with workers, contractors etc.</li> <li>Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the mill</li> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc</li> </ul>	/			/	/
	<b>Site observation to Semarak Estate</b> <b>P1, P2, P3,P4,P5, P6, P7,P8</b> <ul style="list-style-type: none"> <li>New planting</li> </ul>		/	/		

## RSPO PUBLIC SUMMARY REPORT

	<ul style="list-style-type: none"> <li>• Environment, Occupational safety &amp; health aspects, chemical management</li> <li>• HCV &amp; Environment management</li> <li>• Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• Environment, Occupational safety &amp; health aspects, chemical management</li> <li>• Waste Management</li> <li>• Laws and regulations</li> <li>• Interview with workers, contractors etc.</li> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the mill</li> <li>• Interview with gender committee, safety committee, worker representative, contractors, supplier, etc</li> </ul>					
12.30pm to 1.30pm	Lunch Break					
1.30pm – 4.00pm	<b>Site observation to Rajawali Estate</b> <b>P1, P2, P3,P4,P5, P6, P7,P8</b> <ul style="list-style-type: none"> <li>• New planting</li> <li>• Environment, Occupational safety &amp; health aspects, chemical management</li> <li>• HCV &amp; Environment management</li> <li>• Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• Environment, Occupational safety &amp; health aspects, chemical management</li> <li>• Waste Management</li> <li>• Laws and regulations</li> <li>• Interview with workers, contractors etc.</li> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the mill</li> <li>• Interview with gender committee, safety committee, worker representative, contractors, supplier, etc</li> </ul>		/	/		
1.30pm – 4.00pm	Continue assessment at respective site	/			/	/
4.00pm – 5.00pm	Closing meeting at Semarak Estate	/	/	/	/	/

## RSPO PUBLIC SUMMARY REPORT

### Attachment 3

### RSPO P&C AUDIT CHECKLIST AND FINDINGS

#### Principle 1: COMMITMENT TO TRANSPARENCY

Clause	Indicators		Comply Yes/No	Findings
C 1.1 Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1	There shall be evidence that growers and millers provide adequate information upon request for information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.	YES	Rajawali CU continued to implement their documented communication procedure. As the time the audit is penned there was NIL request for information from the stakeholders. All the estates and mill audited provide availability of management documents i.e. related to environment, and social and legal issues were available to the public except for those prevented by commercial confidentiality or where disclosure of information that would potentially result in negative environmental or social outcomes. SDPB continued to use website for disseminating public information which are available in the company's website <a href="http://plantation.simedarby.com">http://plantation.simedarby.com</a> . Information among others in relation to the following; land titles, safety and health plans, pollution prevention plans & procedure for complaints and grievances.
	1.1.2	Records of requests for information and responses shall be maintained. Major Compliance	YES	SOU Rajawali had identified personnel responsible for handling of complaints. Records of communication were maintained at respective offices. Communication with the authority such as DOSH, DOE and Labour Department were maintained in the communication file. At the point of this assessment, there has been no request for such information by the public.
C 1.2 Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.	1.2.1	Land titles/user rights	YES	The right to use the land at Rajawali CU clearly demonstrated and not disputed by any party. Documents related to land ownership i.e. land titles and payment of quit rent were made available at the respective visited offices.
		Occupational health and safety plans	YES	The OSH plans were made available at all the assessed operating units.
		Plans and impact assessments relating to environmental and social impacts	YES	The management documents in relation to environmental plans and impact assessments were made available and maintained at all audited operating units. The documents among others as listed below; Among the documents were: a) Environmental Aspect Identification (EAI) b) Environmental Impact Evaluation (EIE) registers. It was last reviewed on 1/7/19 and 1/8/19 by respective Managers of the OU. c) Pollution Prevention Plan – FY2019. d) Identification and Management of Wastewater – FY2019. e) Contingency plan during water shortage – FY2019 f) Action plan to reduce fresh water usage -FY2019
		HCV documentation summary	YES	Documentation relating to HCV observed maintained available. Refer to 5.2

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators		Comply Yes/No	Findings
		Pollution prevention and reduction plans	YES	Pollution prevention and reduction plans continued to be made available at all assessed operating units. The documents among others are: a) Pollution Prevention Plan – FY2019. b) Identification and Management of Wastewater – FY2019. c) Contingency plan during water shortage – FY2019 d) Action plan to reduce fresh water usage -FY2019 e) Water management plan – FY2019
		Details of complaints and grievances	YES	Details of complaints can be written in the Complaints Book and to be resolved in accordance with the Complaint & Grievances Resolution Procedure. Two separate Complaints Book for external and internal stakeholders are available for each Mill and Estate.
		Negotiation procedures	YES	Negotiation procedure for the SOU 32 Rajawali is contained in the "Flowchart and Procedures On Handling Land Dispute". This document was made available and sighted during the Surveillance Audit. No land dispute between third parties and any of the units was observed.
		Continual improvement plans	YES	Sime Darby Plantation Bhd continued to utilise the existing established system to regularly monitor and review their key activities at its mills and estates aimed for a better performance. Relevant action plans were initiated for continuous improvement such as in; key areas of operations, environmental, safety, health and welfare of the workers and employee benefits and social contribution to the community.
		Public summary of certification assessment report	YES	Public summary can be assessed through SIRIM QAS International website.
		Human Rights Policy	YES	The CU subscribes to SDPB's Social & Humanity Management Policy dated Jan 2015. The policy was signed by the SDPB's Managing Director and are being displayed on various notice boards at the Mill and the estates offices. The policy states among other things, that the business is to be carried out with a sense of humanity, ensuring they are socially beneficial and do not infringe on basic human rights
C 1.3 Growers and millers commit to ethical conduct in all business operations and transactions.	1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. Minor Compliance	YES	SOU Rajawali is bound by, and observes the Sime Darby Group's "Code of Business Conduct (COBC)". This COBC is also available on its website <a href="http://www.simedarby.com/about-us/governance/">http://www.simedarby.com/about-us/governance/</a> and communicated to all employees. The COBC states the Company's commitment towards fair conduct of business, prohibition of all forms of corruption, bribery and fraudulent use of funds and resources. These policies have been communicated to all level of the workforce through display on notice boards at the mill and estates, memos, morning briefings and trainings.



## RSPO PUBLIC SUMMARY REPORT

### **Principle 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS**

Clause	Indicators		Comply Yes/No	Findings
C 2.1 There is compliance with all applicable local, national and ratified international laws & regulations.	2.1.1	Evidence of compliance with relevant legal requirements shall be available. Major Compliance	YES	Generally, Rajawali CU had demonstrated compliance with local, state, national and ratified international laws and regulations. Relevant licenses and permits such as MPOB license, Energy Commission and Ministry of Domestic Trade for diesel storage were valid and displayed at the estate office. Site audit at operational areas and supporting facilities confirmed evidence of compliance. Foreign Workers had valid work permits and passports. The renewal of work permits was carried by SDPB Foreign Workers Centre.
	2.1.2	A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance	YES	The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them. Each estate and mill had its own Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the person in-charge and approved by the respective managers. The PSQM Department is responsible to track changes and the information was disseminated to all its plantations and Mill department.
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	YES	The CU had a documented system for identifying, updating changes to legal requirements and to monitor the status of legal compliance in their EQMS & MQMS (Estate & Mill Quality Management System) included under the Standard Operation Manual. There was evidence of compliance to legal requirements and that it had been evaluated on an annual basis. These compliances were also ensured by PSQM Internal Audits, PA visits and by RSPO Audits.
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	YES	PSQM department, which is based in Kuala Lumpur, is responsible for tracking any changes to the Acts and Regulations. In addition, the CEO of Sarawak Region also played a role in disseminating new Acts & Regulations to all the mills and estates in the Region.
C 2.2 The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.	2.2.1	Documents showing legal ownership or lease, history of land tenure (confirmation from community leaders based on history of customary land tenure, recognised NCR land) and the actual legal use of the land shall be available. Major Compliance	YES	Assessor has verify and can be confirmed that, The land was belonged to Austral Enterprise Bhd. The land was bought by Golden Hope Plantation Sdn Bhd before the merge with Sime Darby in year of 2008. Original copies of Land titles were kept at SDPB headquarters while Rajawali Mill and Estates maintained photocopies of the relevant land titles.
	2.2.2	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and reserves. Minor Compliance	YES	The legal boundaries of the estates were visibly maintained. This was evidenced by the presence of white and red painted pegs along the boundary, especially the ones adjacent to other plantations.

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Clause	Indicators	Comply Yes/No	Findings
	2.2.3 Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with FPIC. Minor Compliance	YES	<p>As reported in 2.2.1 of this checklist, it has been verified that the land belonged to Austral Enterprise Bhd. The land was bought by Golden Hope Plantation Sdn Bhd before the merge with Sime Darby in year of 2008. The audit team had confirmed that there were no land issues related to previous owners. No land was encumbered by customary rights or dispute from any stakeholder at Rajawali CU.</p> <p>However, there was one issue regarding the land claim at Rajawali Estate. The squatters in Rajawali Estate started during Messrs. Anib Plantation Sdn Bhd (APSB) era. It occupies approximately 3,291 ha. In 1993, the number of reported squatters was 471 and increased to 760 in 1998. The company had taken a lot of time and effort to resolve and compromised on this issue which included offering them a 5 acre plot to each squatters.</p> <p>Based on information gathered by the management Lawyers Messrs Ali Basah &amp; Partners, these squatters do not have any Native Customary Rights (NCR) over the area as no evidence to prove that they have settled and created NCR in the locality prior to 1958 (the cut of date for the creation of NCR). However, after 11 court appearances spanning from 13/2/2008 to 26/9/2008, the application for injunction to stop TR Nyalong and TR Jarau and their 'anakbiak' to harvest FFB from part of the planted area (104 ha) was disallowed by the High Court.</p> <p>Regional Office Bintulu on 14/7/2011 has attended a meeting with Land &amp; Survey Bintulu (L&amp;S) together HIKMAH, the custodian of APSB to discuss on this issue. It was agreed that Sime Darby (SD) making an official application to L&amp;S Bintulu for a land swap at Bukit Tiban area adjacent to the estate (Rajawali &amp; Damai) and the application in the form letter to L&amp;S Bintulu was submitted on 3/8/2011. Sime Darby had decided to go down to some of the longhouses to listen from them and evaluate whether a joint venture could be established in resolving the issue. There were evidence such as photograph showing that the management went to the longhouses. There were 28 longhouses on the land and approximately 3,000 people squatting in the area. Based on a letter dated 11/5/2012 to the HIKMAH Headquarters in Kuching, the management of Sime Darby Plantation have decided to surrender the disputed land of 3,291.40 ha to the HIKMAH. One of the reasons was due to the difficulties for the management to find the land for compensation to replace the land involved.</p> <p>As for this Audit in 2019, the audit team interviewed with local communities Representative from Kg Wawasan Jaya, Kg Wawasan Rajawali, TR Kakong, TR Nyalong, TR Jarau and TR Mujah and confirmed that there was no new land claim made by the Indigenous people since Sime Darby released the disputed land in 2012.</p>
	2.2.4 There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes are implemented and accepted by the parties involved. Major Compliance	YES	<p>The land issue as provided in indicator 2.2.3 of this checklist, already resolved by the SOU Rajawali in 2012. Based on the incident, Sime Darby has followed and implemented its own conflict resolution procedures in handling land claims from the local communities before the claimants proceeded to initiate legal action.</p>

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Clause	Indicators		Comply Yes/No	Findings
	2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (incl. neighbouring communities and relevant authorities where applicable). Minor Compliance	YES	Map to appropriate scale showing extent of claims under dispute area has been mapped out in a participatory way in 2012. Sime Darby has already excluded the area from their side.
	2.2.6	To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations. Major Compliance	YES	Based on documented records, interviews with local communities Representatives and the management of Sime Darby SOU Rajawali, there were no evidences that SOU Rajawali has instigated violence in maintaining peace and order in their current and planned operations.
C 2.3 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior, and informed consent.	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights shall be developed through participatory mapping involving affected parties. Major Compliance	YES	Map to appropriate scale showing extent of claims under dispute area has been mapped out in a participatory way in 2012. Sime Darby has already excluded the area from their side. As reported in indicator 2.2.3 of this checklist, it has been verified that the disputed land was already released to the claimants.

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Clause	Indicators	Comply Yes/No	Findings
	<p>2.3.2 Copies of negotiated agreements detailing the process of FPIC shall be available and shall include:</p> <p>a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision-making;</p> <p>b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken;</p> <p>c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land.</p> <p>Minor Compliance</p>	YES	<p>As reported in 2.2.1 of this checklist, it has been verified that the land belonged to Austral Enterprise Bhd. The land was bought by Golden Hope Plantation Sdn Bhd before the merge with Sime Darby in year of 2008. The audit team had confirmed that there were no land issues related to previous owners.</p> <p>With regards to the land claim, as mentioned in indicator 2.2.3 of this checklist, it has been verified that the disputed land was already released to the claimants. Sime Darby has already excluded the area from their side.</p>
	<p>2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>Minor Compliance</p>	YES	<p>All relevant information at the SOU Rajawali are made available in appropriate forms and languages. The following relevant documents were made available in Bahasa Malaysia, which is a language that every party is conversant in, were made available. Auditor has verified all the documents and also the letter dated in May 2012 to the HIKMAH Headquarters in Kuching. The management of Sime Darby Plantation have surrendered the disputed land of 3,291.40 ha to the HIKMAH which is the representative of the Claimants.</p>
	<p>2.3.4 Evidence shall be available to show that communities are represented through institutions</p>	YES	<p>There was evidence that in the last land disputes involving SOU Rajawali, that the Claimants were able and freely to choose their own representatives to represent their claim and interests in the land disputes. During the negotiations, the Claimants had appointed their Tuai Rumah</p>

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Clause	Indicators	Comply Yes/No	Findings
	or representatives of their own choosing, including legal counsel. Major Compliance		as their Representative, and also HIKMAH as a whole land owner for the claimants as shown in their letter dated in July 2011.

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

Clause	Indicators	Comply Yes/No	Findings
C 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability.	3.1.1 A business or management plan (min 3 yrs) shall be documented. That includes, where appropriate, a business case for scheme smallholders. Major Compliance	YES	Rajawali SOU continued to commit to long-term economic and financial viability. The annual budgets for 2019 to 2023 were sighted. The budget covers activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure and RSPO compliance. The budget also included projections on yield/ha, and total cost of production per m ton & per ha.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, shall be available. Minor Compliance	YES	The replanting programme for the next five years had been prepared. Sighted the Long-Range Replanting Programme (LRRP) 2019 to 2023. This programme reviewed once a year and is incorporated in their annual financial budget.

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

Clause	Indicators		Comply Yes/No	Findings
C 4.1 Operating procedures are appropriately documented, consistently implemented and monitored.	4.1.1	Standard Operating Procedures (SOPs) for estates and mills shall be documented. Major Compliance	YES	The SOPs for Rajawali SOU continued to be documented, consistently implemented and monitored. Brief version of the SOPs were displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. The ARM included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. For all the 4 estates, on top of the EQMS, contents of the Agriculture Reference Manual were disseminated to the workers through morning roll call and trainings. The Manual was also kept in the administration office where everyone can refer to. Site inspection and interview with workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.
	4.1.2	A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	NO	Rajawali SOU had the mechanisms to check the implementation of procedures and were carried out through internal audit, safety and health meeting and routine inspection (workplace inspection) by assistant manager, staff and hospital assistant. During the field visit, we found that in field 99SA, 99SB and 98SL of Samudera Estate, the inter lines were still covered with woody growth Clidemia hirta. Therefore a Major NCR MN01 2019 has raised against this indicator. Since this was a recurring Minor NCR.
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	YES	Records of monitoring and actions taken by the estates continued to be maintained. This is to ensure that the established procedures were consistently implemented. Records of monitoring and actions taken by all the 4 estates were maintained and kept for a minimum of 12 months.
	4.1.4	The mill shall record the origins of all third-party sourced FFB. Major Compliance	YES	The scope for Rajawali POM SC is Identity Preserved. Hence, this indicator is not applicable.
C 4.2 Practices maintain soil fertility at or, where possible, improve oil fertility to a level that ensures optimal and sustained yield.	4.2.1	There shall be evidence that good agriculture practices, as contained in SOPs, are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance	YES	Rajawali SOU continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer recommendations. Fertilizer application, which was of paramount importance for maintenance of soil fertility, were carried out based on the recommendation made by the agronomist from Sime Darby Research Sdn. Bhd. The recommendations by the Agronomist were also available during the inspection and the application of fertilizers had been carried out as recommended and scheduled. Noted from the records that the actual amount of fertilisers applied in 2018 were completed.
	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	YES	Rajawali SOU continued to monitor their fertilizer inputs as recommended by their agronomist, from Sime Darby Research Sdn. Bhd who visited all the 4 estates. Fertiliser application program was monitored using records like manuring master plan, program sheets, bin cards, field cost book,

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Clause	Indicators		Comply Yes/No	Findings
				manuring audits by Planning and Monitoring Department under Upstream Department from headquarters. Records of programs and applications of fertilisers were made available to auditors. Records showed that actual applied in 2018 was in line with recommendations in all 4 estates.
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	YES	Periodic tissue and soil sampling were carried out in Rajawali SOU to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitor the changes in the organic carbon and total nitrogen. For all the 4 estates, agronomic assessment and fertiliser recommendation was conducted by Sime Darby Research Sdn. Bhd to formulate the FY2020 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement.
	4.2.4	A nutrient recycling strategy shall be in place, and may include use of EFB, POME, and palm residues. Minor Compliance	YES	Rajawali SOU had a nutrient recycling strategy where palm fronds were properly stacked in the interrow to decompose and EFB were applied in the mature and immature area of Rajawali, Bayu, Samudera, and Semarak Estates respectively. EFB will help to supplement the inorganic fertilizer thus improving the nutrient status of the field.
C 4.3 Practices minimise and control erosion and degradation of soils.	4.3.1	Maps of any fragile/marginal soils shall be available. Major Compliance	YES	During the field visit and the soil map provided it was observed that no fragile or marginal soils in Rajawali SOU.
	4.3.2	A management strategy shall be in place for plantings on slopes between 9 and 25 degrees unless specified otherwise by the company's SOP. Minor Compliance	YES	Rajawali SOU had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by: <ul style="list-style-type: none"> <li>• Slope &amp; River Protection Policy</li> <li>• Buffer Zone &amp; 25 degree slope and in item 8 Section 4</li> <li>• Land Preparation for Terracing in ARM Manual.</li> </ul> It was observed that practices to minimise and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crop were planted in the replants and in some mature areas. The cover crop <i>Mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>Neprolepis biserrata</i> in the inter rows were sighted during the visit.
	4.3.3	A road maintenance programme shall be in place. Minor Compliance	YES	Rajawali SOU continued to maintain its road, according to the road maintenance programmes. The programs had been supported by adequate provisions in the budgets. For road maintenance, all estates had used motor graders and tractor drawn rollers, back hoes, tractors with back buckets and excavators. For resurfacing crusher run were purchased. Surface run off water from roads is directed into fields and road side drains. De-silting of drains was carried out with excavators. For all Estates, road maintenance programme for 2019 were sighted.
	4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management	YES	At Rajawali estate, subsidence of peat soil has been monitored by monthly basis and recorded in file "peat subsidence record" included water level table. Sighted 4 piezometer has been installed for every 5 ha.

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Clause	Indicators	Comply Yes/No	Findings
	programme shall be in place. Major Compliance		
	4.3.5 Drainability assessments where necessary will be conducted prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. Minor Compliance	YES	During site visit at peat area based on long range replanting program (LRRP) replanting will be conducted for next year. Sighted a manual / SOP for peat area to conduct drain ability assessment such as every inter row will be installed with "4 ft Drain "to retain water table on the field.
	4.3.6 A management strategy shall be in place for other fragile and problem soils (e.g. podzols and acid sulphate soils). Minor Compliance	YES	There were no problematic soils in all the 4 estates.
C 4.4 Practices maintain the quality and availability of surface and ground water.	4.4.1 An implemented water management plan shall be in place. Minor Compliance	YES	For Rajawali POM Water Management plan 2019 was updated in Jan 2019 and explain about Recycling Processing water, recycle condensate water, to use back water treated from POME to cleaning purpose at mill and hydro cyclone operation during water shortage, collection of rain Waters, Linesite Water usage Monitoring, Contingency Plan to covered dry spell/shortage. All estates continued to be guided by the common Water Management Plan which was developed in order to maintain availability of natural water resources.
	4.4.2 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones shall be demonstrated. Major Compliance	YES	Rajawali CU continued to implement its SOP and Policy on maintenance of the riparian zone. The buffers zones had been identified in accordance with Department Irrigation and Drainage. Interviews with the workers revealed that they understood the requirement of keeping the riparian zones free from any agricultural activities such as application of fertilizer and chemical weeding. Site visit was conducted to verify the protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before replanting along all natural waterways within the estate. All Estates continued to maintain the protection on water courses, including maintaining and restoring appropriate riparian buffer zones along all natural waterways within the estate.
	4.4.3 Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national regs. Minor Compliance	YES	Analysis of the final discharge was carried out by third party on monthly basis. Results were submitted to DOE through the quarterly report and indicated in compliance to the regulatory limit.
	4.4.4 Mill water use per tonne of		Mill water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on daily and



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Clause	Indicators		Comply Yes/No	Findings
		FFB shall be monitored. Minor Compliance	YES	monthly basis. A slightly higher water usage noted, probably due to the proportionate reduction in volume of FFB being processed.
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate IPM techniques.	4.5.1	Implementation of IPM plans shall be monitored. Major Compliance	YES	Rajawali SOU continued to implement IPM in all the 4 estates and continue to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Agricultural Reference Manual (ARM) Section 15 -Plant Protection. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma.
	4.5.2	Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	YES	Training related to IPM implementation as per the Agricultural Reference Manual (ARM) Section 15 - Plant Protection was conducted by Assistant Managers. Training records were evident.
C 4.6 Pesticides are used in ways that do not endanger health or the environment.	4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. Major Compliance	YES	Written justification in Standard Operating Procedure (SOP) of all agrochemical was available in Section 15 and 16 of the Agricultural Reference Manual and in the Safety Pictorial Book prepared by Sime Darby Plantation Bhd. The use of selective products that are specific to the target pest, weed or disease were demonstrated in the Agricultural Reference Manual (ARM). Chemical registers indicate the purpose of usage (intended target), hazards signage, trade and generic names.
	4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) shall be provided. Major Compliance	YES	Rajawali SOU had records to show the types of pesticides used with active ingredients and their LD50, where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available for verification.
	4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice. Major Compliance	YES	Rajawali SOU were committed to minimise the usage of agrochemicals by implementing Integrated Pest Management (IPM) plans. Blanket spraying was not practised by this SOU and soft grasses maintained in the field. It had also been the practice that pesticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section 15 -Plant Protection and that no prophylactic use of such pesticides would be permitted.

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Clause	Indicators	Comply Yes/No	Findings
	<p>4.6.4 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in industry's Best Practice. The use of such pesticides shall be minimised and/or eliminated as part of a plan, and shall only be used in exceptional circumstances. Pesticides selected for use are those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). Minor Compliance</p>	YES	<p>All the 4 estates only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Reg. 2000. From the review of the chemical register, it was noted that all pesticides used were of class ii, iii &amp; iv. The use of paraquat had been banned in all Sime Darby Plantation Berhad Estates. There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. From records and interviews with workers, staff and estate assistants, found that they were trained, all precautions taken and all legal requirements met.</p>
	<p>4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers. Major Compliance</p>	YES	<p>Records verified at time of visit at Rajawali SOU estates showed that pesticides were handled, used and applied by trained persons and as per the MSDS of the pesticide. The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involve and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the MSDS training. It was also noted that MSDS are available at all sites during the audit. Training on pesticide handling and spraying technique was carried out by OSH team and by the Assistant Manager. The training included the safety aspects and usage of PPE when handling with pesticides. Record of training was available for verification. All workers involved in pesticides application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. From interviews conducted with workers and staffs in the field and stores clerks it was established that they had been trained and were aware of safe handling procedures.</p>
	<p>4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide</p>	YES	<p>The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). Records of purchase, storage and use were maintained. All of the stores were equipped with locks and keys and the doors</p>

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Clause	Indicators	Comply Yes/No	Findings
	containers shall be properly disposed of and not used for other purposes. Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Regs. Major Compliance		were secured. Only authorized personnel are allowed to handle the chemicals. All the chemicals were segregated accordingly. Empty pesticides containers were triple rinsed, holes punched in them and stored separately in the scheduled wastes store awaiting proper disposal.
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	YES	Pesticide applications were guided by the company's SOPs such as Safety Standard Operating Procedure (SSOP), Pictorial Safety Standards, and Security Guidelines (PSS).and Agriculture Reference Manual (ARM). The chemicals used in the Company's estates are the common chemicals used and established in the palm oil industry. Proper PPE and tools were provided to ensure that the application of pesticides were carried out appropriately and thus minimise risks and impact to health and safety.
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. Major Compliance	YES	Aerial spraying was not practiced by all four estates. There was no evidence to show that any had been carried out. All estates only practices circle spraying and selective spraying which is only for targeted species such as woodies and VOPs.
4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide-handling shall be demonstrated or made available. Minor Compliance	YES	From interviews with the staff and workers such as the storekeepers and workers who applied fertilizers, it was evident that they have been trained and understood the hazards involved and how the chemicals should be used in a safe manner.
4.6.10	Proper disposal of waste material, according to procedures that are fully-understood by workers and managers shall be demo. Minor Compliance	YES	At Rajawali CU the disposal of waste material was guided by the SOPS. Domestic waste was collected every 2 days from the living areas on all estates and disposed at landfills which were more than 3 KM from the living areas. The landfills were managed well.

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Clause	Indicators		Comply Yes/No	Findings
	4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. Major Compliance	YES	Annual medical surveillance had been conducted by DOSH registered Doctors on all 4 Estates visited. In addition, checks-up were made on monthly basis for the chemical handlers internally by the Estate Medical Assistant. All records were sighted and verified. All the examined employees were found FIT to perform duties as declared by the Medical Officer.
	4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. Major Compliance	YES	All the estates and mill in the CU 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> ). The estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.
C 4.7 An occupational health and safety plan is documented, effectively communicated and implemented. The occupational health and safety plan shall cover the following:	4.7.1	An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. Major Compliance	YES	A Group Occupational Safety & Health Management Policy had been established and implemented. The policy was signed by the Managing Director of Sime Darby Plantation dated January 2015 and displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the Regional SQM Executives and monitored by SQM Department at Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors. The implementation of OSH plan was monitored by internal audits conducted by OSH officers from SQM department.
	4.7.2	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance	YES	Both the mill/estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following; a) Change in work process b) Revision/changes in legislative requirement c) Occurrence of accidents HIRARC for the mill and estates was formalised on in 2008 with latest review made in July 2019. Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guards and well protected. Appropriate administrative controls such as safety signage were displayed at all work stations in the mill and estates office and workshop. In general, the control measures were appropriate to the identified risks. A person-in-charge at each site were appointed to monitor the implementation of the control measures through the 5S initiative.
	4.7.3	All workers involved in the		Site visit to the office complex to observe the store management and the chemical mixing area

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Clause	Indicators	Comply Yes/No	Findings
	operation shall be adequately trained in safe working practices. Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. Major Compliance	YES	evidenced that workers on duty were fully equipped with mask, rubber gloves, rubber boots & apron. Auditor also verify at Rajawali Estate and Semarak Estate, and observed work harvesting and sighted the workers already wearing helmets and other PPEs as provided by the management. Harvesting sickles, chisels, axes and parangs were provided with covers. Trainings were provided during musters and also in session held in the estate community hall. The following trainings made for the employees were recorded as follows. Subjects extracted were mainly related to ESH, SOPs, and pesticide handlings. Trainings were provided during musters and also in session held in the estate community hall.
4.7.4	The responsible person/s shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. Major Compliance	YES	The management of Rajawali CU had identified responsible person and conducted regular meetings. Letters of appointment for the Managers signed by the Regional CEO & Regional General Manager was sighted. The Managers subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the estates. Similar appointment was made for all the estates and the mill. All identified Executives were officially given a letter for such an appointment. Each Estate had an OSH and Environmental Committee. All estates and the mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. Minutes of meetings held by the mill and estates were verified.
4.7.5	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and	YES	Accident and emergency procedures based on SDPB policy on 'Crisis Management & Emergency Response' plan, OSH manual and "Accident and Reporting and Investigation Procedure" in chapter 14 of the same manual. Each estate and mill had procedures to act for emergency situations as listed below in the table. ERP Teams for all the identified incidences were available in all Estates and Mill. The organisational chart for the ERP teams were displayed at notice boards for information of the employees. Important telephone contact numbers were also provided therein. Each Estate had an Emergency Response Team headed by the respective Managers. ERT members were trained in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who could demonstrate their suitability to provide training. Record of accident has monitored and recorded and reported to headquarters by monthly basis. Also was sighted total accident record (JKKP 8) has been submitted to DOSH on 03/01/2019. For year 2018 there was no accident has been recorded. For year 2019 there was no accident recorded.

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Clause	Indicators		Comply Yes/No	Findings
		periodically reviewed. Minor Compliance		
	4.7.6	All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	YES	SOU Rajawali provides basic medical care to all workers at its clinics within its premises while serious cases are referred to Hospital Bintulu which is about 50 Km from the Estates and Mill. SOU Rajawali had continued to provide a group insurance for some foreign workers as required under the Workmen Compensation Act 1952. Local workers and some Foreign workers were covered by SOCSO.
	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	YES	Records of all accidents were maintained. All occupational injuries were recorded using LTA. (Lost Man day MC.) This was summarized officially in the JKPP 8. Records were kept for a minimum 10 years in the office. Summary for the year was described in the JKPP 8 which was a mandatory requirement for submission to DOSH by Jan of the subsequent year. All accident cases, if any, were reviewed during safety meetings. Where required submissions of JKPP 6, & 8 to DOSH were complied with under the legislative requirement. Investigations and revision of HIRARC where appropriate were made accordingly. All units submitted the JKPP 8 in January of each year, thus complying with the DOSH statutory requirement.
C 4.8 All staff, workers, smallholders and contract workers are appropriately trained.	4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO P&C, and that includes regular assessments of training needs and documentation of the prog. Major Compliance	YES	Formal training programmes for 2019 that covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs were available for all the audited sites. Training Plan was for each operating unit were established. A training need identification matrix has been established with target dates for the training identified. The training program among others includes the following subjects:
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	YES	Training records maintained accordingly.

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

Clause	Indicators		Comply Yes/No	Findings
C 5.1 Aspects of plantation and mill management, including replanting, that	5.1.1	An environmental impact assessment (EIA) shall be documented. Major Compliance	YES	The EIA is available and being reviewed accordingly. Among others the significant environmental aspects related to the estate operation including the activities from FFB transportation to the mill, Movement of vehicles/transportation of estates machines and tractors, Herbicide/pesticides spraying, Anti-malaria fogging, Road resurfacing & grading, Grass cutting /construction activities, harvesting, pest and disease, upkeep programme, nursery / replanting and Water treatment Plant. Documents are maintained, sighted and verified.

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Clause	Indicators		Comply Yes/No	Findings
have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.				Among others the EAls are divided into the all stations in the mill processing as listed below. The newest added activities being the MDS and ETP (additional dust cyclone being installed, the boiler stack emission, black smoke, palm oil mill effluent (POME) discharge and water contamination, Activities related to managing of scheduled wastes and general waste, Activities of all operations beginning from the mill entrance ending to the effluent, EFB operations. Documents are maintained, sighted and verified.
	5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive action plan. The action plan shall identify the responsible person/s. Minor Compliance	YES	<p>There was no changes in the existing practices required to mitigate negative effects based on identified impacts for both the mill and estates.</p> <ul style="list-style-type: none"> <li>a) The mill and estates had conducted periodical review on the aspects and impacts identified and evaluated as registered.</li> <li>b) The mill and estates have continuously implemented annual programs that were established as part of its individual Pollution Prevention Plan.</li> <li>c) Managers and Assist Managers of mill and estates were identified as person-in-charge of the programs which were established upon review of the aspect and impact register.</li> <li>d) Significant environmental aspect and impact was derived from the environmental impact evaluation (EIE). Those activities evaluated as significant were monitored using the mitigation measures established for each significant activity.</li> </ul> <p>The targets and program/efforts by the Estates in achieving to lower the environmental aspect/impact among others were described in the Environmental Management/Action Plan 2019. The plans were:</p> <ul style="list-style-type: none"> <li>• IPM of Sime Plantations</li> <li>• Action Plan HCV of Sime Plantations</li> <li>• Fossil Fuel Reduction Plan</li> </ul> <p>Records of periodical reporting of the listed issues were available. These were the evidence which showed that the plans been monitored. The plans were reviewed annually during the Management review / ESH meeting where environmental issues were discussed.</p>
	5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a min. every 2yrs to reflect the results of monitoring and where there are operational changes that may have positive & negative env. impacts. Minor Compliance	YES	An environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. Pollution prevention plan and waste management plan was reviewed on yearly basis and was verified at all visited operating units. Sighted and extracted the following environmental management plan for 2017/18.

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Clause	Indicators		Comply Yes/No	Findings
<p>C 5.2 The status of rare, threatened or endangered species other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and ops managed to best ensure that they are maintained and/or enhanced.</p>	5.2.1	Information shall be collated in a HCV assessment that includes both the planted area itself and relevant wider landscape-level considerations. Major Compliance	YES	SOU Rajawali has reviewed their HCV with new assessment conducted on June 2017. The new HCV assessment titled 'HCV Assessment For Sarawak Zone which included both the planted area and relevant wider landscape-level considerations with villages and forest reserved. The total area of HCV area for SOU Rajawali is 275.4ha HCV area and Conservation set aside (CSA) area 29.90 ha.
	5.2.2	Where RTE species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan. Major Compliance	YES	The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird sighted.
	5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instituted in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. Minor Compliance	YES	Although there was no RTE species found in the CU, Sime Darby still established their own disciplinary measures if any of their staff or workers found to capture, harm, collect or kill the RTE species. If found any activities to capture, harm, collect or kill RTE species, the estates will make a report to the Sarawak Wildlife Department immediately. The training for HCV also has been conducted accordingly.
	5.2.4	Where an action plan has been created there shall be ongoing monitoring: The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; Outcomes of monitoring shall be fed back into the action plan. Minor Compliance	YES	An action plan for FY2019 was made available at the Rajawali, Bayu, Semarak and Samudera. The outcomes of monitoring were included in the HCV report. An action plan for FY2019 was made available at the Rajawali, Bayu, Semarak and Samudera Estate. The outcomes of monitoring were included in the HCV report. 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



## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators		Comply Yes/No	Findings
	5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. Minor Compliance	YES	There is no HCV set-asides with existing right of local communities in SOU Rajawali.
C 5.3 Waste is reduced, recycled, re-used, and disposed of in an environmentally and socially responsible manner.	5.3.1	All waste products and sources of pollution shall be identified and documented. Major Compliance	YES	All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2019. The compilation for Financial Year 2019 was made at SOU/Regional level.
	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	YES	Rajawali CU adopted the guidelines provided by DOE & EQA (Scheduled Waste) Reg 2005 on the empty chemicals containers management. All empty chemical containers from all estates and mill were disposed through approved licensed contractor Trienekens (Sarawak) Sdn Bhd.
	5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. Minor Compliance	YES	There are procedures and guidelines in the disposal of wastes and pollutants issued by the SDPB Head Office level to minimise pollution on the routine operation.
C 5.4 Efficiency of fossil fuel use and the use of renewable energy is optimised.	5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. Minor Compliance	YES	A plan for improving the efficiency of the use of fossil fuels was established. It had been incorporated into the Environmental Aspect and Impact activities report for 2019. The document was updated on every Financial Year. Sighted monitoring of diesel consumption tabulated on monthly basis for both the estates and the mill. Ratio litres/mt FFB is calculated to analyse the usage to ensure it falls within the acceptable range.
C 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice	5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Major Compliance	YES	SDPB policy on no open burning was reflected in the EQMS-SOP-Section B2 - Under felling/clearing & land preparation and Carbon Policy. All estates practiced zero burning. During the visit to replant areas, it was evident that all palms were felled, shredded, windrowed left to decompose. Visited 2018 & 2019 replant
	5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled	YES	As per SDPB policy on zero burning during land preparation for replanting, all estates had adhered to this policy. There was no evidence of any burning.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators		Comply Yes/No	Findings
		burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Minor Compliance		
C 5.6 Preamble Growers and millers commit to reporting on operational greenhouse gas emissions. However, it is recognised that these significant emissions cannot be monitored completely or measured accurately with current knowledge and methodology. It is also recognised that it is not always feasible or practical to reduce or minimise these emissions. Growers and millers commit to an implementation period until the end of December 2016 for promoting best practices in reporting to the RSPO, and thereafter to public	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent.	YES	<p>The gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records covers estate and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' – is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly.</p> <p>Among the significant environmental receptors for the estates and mill operations were:</p> <ul style="list-style-type: none"> <li>a) Air emissions –from boiler stack (smoke and particulate), vehicle and generator (smoke and gases), GHG emission from anaerobic processes (ETP, EFB dumping).</li> <li>b) Water discharges – Cleaning water / run-off / process station waters (hydrocyclone / sterilizer condensate/clarification waste) and boiler quenching water and blowdown.</li> <li>c) Land – Scheduled waste, domestic waste and industrial / process waste.</li> <li>d) Clinical wastes – generated from clinics.</li> </ul> <p>An assessment of identified polluting activities is being conducted and monitored. These include gaseous emissions, particulate / soot emissions, effluent discharge and the scheduled wastes and domestic wastes. Rajawali POM has established plans to reduce or minimise GHG emission by:</p> <ul style="list-style-type: none"> <li>• To carry out scheduled maintenance for boiler &amp; machineries to ensure fuel diesel usage is at optimum level.</li> <li>• To create awareness among workers to save electricity and fuel usage</li> <li>• To ensure no spillage and leakages from skid tank</li> <li>• To install electricity from SESCO</li> </ul>
	5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	YES	<p>Rajawali CU had identified emission of GHG from their operations such as emission from their farm tractor and gen set operation. The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment.</p> <p>Pollution Identification Environmental improvement action plan' – is used to identify the waste products and sources of pollution and actions taken to mitigate and reduce them are in place and are being</p>
	5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. Minor Compliance	YES	<p style="text-align: center;"><b><u>Summary of net GHG emissions from PalmGHG calculator</u></b></p> <p style="text-align: center;"><b>PalmGHG calculation option used: Option 2</b></p>

# RSPO PUBLIC SUMMARY REPORT

Clause	Indicators		Comply Yes/No	Findings																																								
reporting. Growers and millers make this commitment with the support of all other stakeholder groups of the RSPO. Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.				<b>Summary of Net GHG Emissions</b>																																								
				<table><tr><th>Emissions per Product</th><th>tCO2e/tProduct</th><th>Extraction</th><th>%</th></tr><tr><td>CPO</td><td>1.58</td><td>OER</td><td>21.43</td></tr><tr><td>PK</td><td>1.58</td><td>KER</td><td>4.77</td></tr><tr><th>Production</th><th>t/yr</th><td></td><td></td></tr><tr><td>FFB Processed</td><td>157768.25</td><td></td><td></td></tr><tr><td>CPO Produced</td><td>33808.29</td><td></td><td></td></tr></table>	Emissions per Product	tCO2e/tProduct	Extraction	%	CPO	1.58	OER	21.43	PK	1.58	KER	4.77	Production	t/yr			FFB Processed	157768.25			CPO Produced	33808.29																		
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Clause	Indicators		Comply Yes/No	Findings					
					Crop Sequestration	-75652.91	-0.51	-6087.36	-0.6
					Conservation Sequestration	0	0	0	0
					Total	23352.46	0.16	1959.58	0.68
					Summary of Mill Emissions and Credits				
						tCO2e	tCo2e/tFFB		
					Emissions				
					POME	38222.93	0.24		
					Fuel Consumption	1789.04	0.01		
					Grid Electricity Utilisation	0	0		
					Credits				
Export of Grid Electricity	0	0							
Sales of PKS	0	0							
Sales of EFB	0	0							
Total	40011.97	0.25							
Palm Oil Mill Effluent (POME) Treatment									
Divert to compost		0%							
Divert to anaerobic digestion		100%							
POME Diverted to Anaerobic Digestion:									
Divert to anaerobic pond		100%							
Divert to methane capture (flaring)		0%							
Divert to methane capture (electricity generation)		0%							

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### **Principle 6: RESPONSIBLE CONSIDERATION OF EMPLOYEES AND OF INDIVIDUALS AND COMMUNITIES BY GROWERS AND MILLERS**

Clause	Indicators	Comply Yes/No	Findings
C 6.1 Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	6.1.1 A social impact assessment incl. records of meetings shall be documented. Major Compliance	YES	SIA Assessment Report for Rajawali CU entitled "Social Impact Assessment, (SIA) Report SOU 32 Rajawali was prepared in Sept 2016. Records of meetings were also sighted and based on the reports reviewed, there is evidence that it was prepared with the participation of Rajawali's relevant stakeholders. These included its own workers, government agencies such as Police Department of Bintulu and National Resources Environmental Board (NREB) Bintulu. Also present was neighboring plantations and local communities. Latest stakeholder meeting was conducted in Sept 2019. It was attended by various stakeholders and among the issues raised were transportation of the pupils to the school to and fro, CSR projects such as to furnish the old furniture at the school and updating of E SWISS by DOE.
	6.1.2 There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	YES	Based on the checking, it was evident that the SIA was done with the participation of the affected parties as evidenced from the report reviewed.
	6.1.3 Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, incl. responsibilities for impl. Major Compliance	YES	There is evidence that the reviews of the Action Plan were developed following inputs and feedbacks from affected parties. The inputs were then incorporated into a document with timetables and names of persons in charge.
	6.1.4 The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. Minor Compliance	YES	It was evident that the SIA plan was reviewed and its include the participation from affected parties.

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Clause	Indicators		Comply Yes/No	Findings
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	YES	There was no smallholder scheme at SOU 32 Rajawali and therefore this indicator is not relevant.
C 6.2 There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties	6.2.1	Consultation & communication procedures shall be documented. Major Compliance	YES	There is a documented consultation and communication procedures identified as Stake-holder Consultation Procedure. This procedure identifies impacts of the Company's operations on its stakeholders based on interview, consultation, discussion and meetings with its stakeholders. The Company also has a Communication Procedure. The document provides the procedures for external and internal stakeholders to lodge a complaint or grievance on matters related to safety, health, cleanliness, environmental, disputes, thefts, and others. These Procedures have been communicated to workers during muster briefings and workers who were interviewed confirmed their understanding of the communication procedures in place.
	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	Management officials responsible for social issues were duly appointed by the management. Their job descriptions are listed in letter of appointment, which specifies their responsibilities as follows: welfare and social needs of stakeholders, periodic visits to line-site and social amenities, periodic visits to neighbouring stakeholders, identifying social issues affecting stakeholders, monitoring creche, acts as a focal point to monitor social trends in surrounding estates and act accordingly.
	6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. Minor Compliance	YES	The stakeholder lists for all the units, namely Rajawali POM, Rajawali, Semarak, Bayu and Samudera Estates, were updated in Sept 2019. It was made available and sighted during the surveillance audit.
C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties	6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants & whistleblowers, where requested. Major Compliance	YES	There is a documented system for dealing with complaints and grievances. This system is open to all affected parties to resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers. The document is known as The Grievance Procedure, and the detailed procedure is known as Reporting of Complaints and Grievances: Internal and Stakeholders (Complaints Flowchart).
	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available.	YES	Documentation of both the process by which a dispute was resolved and the outcome was available. Complaint feedback logbook where complaints are recorded and filed was reviewed. For all the Mill and Estates within Rajawali CU, the logbooks mainly comprise complaints from workers on repairs that need to be done to their houses. The Complaints Book have details such as name of complainant, date

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Clause	Indicators		Comply Yes/No	Findings
		Major Compliance		of complaint, types of complaint, and signature of person receiving the complaint, and an action column which states the actions carried out.
C 6.4 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. Major Compliance	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System document issued on 1/11/2008 (Version 1) entitled: <ul style="list-style-type: none"> <li>• "Procedures for Handling Boundaries Disputes";</li> <li>• "Procedures For Handling Squatters Dispute" (for land issues or ex-workers who remain in housing complex)</li> </ul> The procedures state that ex-workers issues are to be handled by the Employee Relations, and the land issues by the Land Management Department of the Head Office. Both procedures stipulate the negotiation procedures, calculation and distribution of compensation to the affected parties.
	6.4.2	A procedure for calculating and distributing fair compensation established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established comm; and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance	YES	In accordance with the Procedures for Handling Boundaries Disputes (see Indicator 6.4.1 above), the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures. Proposed resolutions in the negotiation process include: <ul style="list-style-type: none"> <li>i) Affected parties to vacate the area.</li> <li>ii) Compensation to be given to affected parties.</li> <li>iii) Resettlement of affected parties to another site proposed by estate management.</li> </ul> As of the date of the audit, the case of negotiation and payment of compensation has been explained at indicator 2.2.3.
	6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. Major Compliance	YES	As of the date of the audit, the case of negotiation and payment of compensation has been explained at indicator 2.2.3.
C 6.5 Pay and conditions for employees and	6.5.1	Documentation of pay and conditions shall be available. Major Compliance	YES	Pay and conditions are documented and made available during the surveillance audit. These are contained in the workers' payslips and employment contracts. Pay slips were sighted and are provided to workers on a monthly basis as confirmed during worker interviews. Pay slips for Mill and Estate field

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Clause	Indicators		Comply Yes/No	Findings
for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages				workers show breakdown for all work done such as allowances received, deductions, no. of days worked and for the Mill, any overtime hours performed.
	6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment. Shall be available in the languages understood by the workers or explained carefully to them by a management official. Major Compliance	YES	Rajawali CU issues out contracts of employment to all its foreign employees, and letters of offer of employment to its Malaysian employees. The contracts detail out payments and conditions of employment (e.g. wages payable, working hours, deductions, overtime, sickness, insurance coverage, retirement age, holiday entitlement, maternity leave, reasons for dismissal, period of termination notice, mutual termination rights, etc). The employment contracts were prepared in Bahasa Malaysia which is the language understood by the Malaysian and Indonesia workforce. The contents of the contract were explained to them by the management representative. Both the workers and the management representative confirmed this during the interview. The workers' understanding were confirmed before they were asked to either sign or thumbprint on their respective employment contracts. The Company was deducting from workers' pay for payments of electricity, acquisition of work tools from the store, payments for processing of travelling documents for workers and dependants, medical expenses for dependants, and dependant's travelling costs to hospital. These deductions were made with the workers' written consent and written permission granted by the Labour Office granted to the POM and Estates.
	6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national stds or above, in acc. with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible. Minor Compliance	YES	The Company provides adequate housing for all their Mill and Estate workers. Workers are also accorded water supplies, electricity, medical, educational and welfare as required under the Workers' Minimum Standard of Housing and Amenities Act 1990. This was observed during field visits to the workers' housing for all the Estates and Mill at Rajawali CU. Among the facilities provided include NEST, Community Learning Centres, free transportation for workers' children to go to school, a centralized health clinic at each estate office complex, places of workshop, playing fields, sundry stores, and a community hall. At the Mill, it was also noted that the workers are also provided with a prayer room, a rest area and separate male and female toilets, all of which are maintained in clean and good condition. Treated water is supplied to all the houses. and the list name was updated as at audit visit. The
	6.5.4	Growers and millers shall make demonstrable efforts to monitor oil and where able, improve workers' access to adequate, sufficient and affordable food. Minor Compliance	YES	The Company has demonstrated efforts to monitor and improve workers' access to adequate, sufficient and affordable food through the shops in the respective estates. Among the items sold were rice, cooking oil, flour, sugar, salt, coffee, eggs, canned drinks, bottled water, etc. Sundry shops are available at all Estates and Mill housing areas. All sundry shops are required to provide a list of prices for all items sold in the shops for price monitoring, and the prices for every item are clearly labelled. Workers interviewed also confirmed that the prices at the sundry shops are reasonable, taking into account the distance between the shops and the nearest town.
C 6.6 The employer respects the rights of all personnel to	6.6.1	A published statement in local languages recognising freedom of assoc shall be available. Major Compliance	YES	Recognition of freedom of association is available in the Sime Darby Plantation Social Policy dated January 2015. The policy states that the company respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. This Social Policy is applicable throughout all operating units and is printed and translated in Bahasa Malaysia and displayed on notice boards.



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Clause	Indicators		Comply Yes/No	Findings
form and join trade unions of their choice and to bargain collectively. Where the right to freedom of assoc & collective bargaining are restricted under law, the employer facilitates parallel means of ind & free assoc & bargaining for all such personnel.	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	YES	The workers in the estates and mill are not unionized. However, Mill have its own Trade Union Committee (workers Representative) where several workers (both local and foreign sit on the Committees. However, worker representatives who sit on the Safety Committees were appointed by the Mill Management respectively seconded by workers. Workers interviewed are aware of who these representatives are. Minutes of the meetings are documented and sighted during this Surveillance Audit.
C 6.7 Children are not employed or exploited.	6.7.1	There shall be documentary evidence that minimum age requirements are met. Major Compliance	YES	The policy on non-employment of children is contained in the Sime Darby Social Policy dated January 2015. There was no evidence that the estates and the mill employ anyone below the age of 18 years. This was verified by examining the master lists of workers. Interviews with workers and staffs, as well as observations made during field visits show that those employed are 18 years and above.
C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	6.8.1	A publicly available equal opportunities policy incl id of relevant/affected groups in the local env. shall be doc. Major Compliance	YES	The equal opportunities policy is contained within the Sime Darby Social Policy dated January 2015, which states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Social Policy was displayed on notice boards in both Bahasa Malaysia and English.
	6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. Major Compliance	YES	Apart from the Social Policy which states that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees. Payment of wages/salaries, provision of housing and access to benefits and amenities is fair based on observation, review of pay checks, contracts of employment, and interviews of staff, local and foreign workers (harvesters, sprayers). Foreign workers are also accorded the same living standards and accommodations as local workers.
	6.8.3	It shall be demo that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. Minor Compliance	YES	Based on interviews with the estates and mill management and documentation review (interview assessment and medical report), recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness appropriate for the job. Candidates submit their application forms followed by interview assessment and medical check-up. Annual appraisal forms are used to determine the employee's skills and capabilities.
C 6.9	6.9.1	A policy to prevent sexual and		Rajawali CU subscribes to the Gender Policy established on January 2015. Additionally, the company

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators		Comply Yes/No	Findings
There is no harassment or abuse in the work place, and reproductive rights are protected.		all other forms of harassment and violence shall be implemented & communicated to all levels of the workforce. Major Compliance	YES	also has a Guideline and Procedure Sexual Harassment which was prepared in Bahasa Malaysia and English. A copy each was distributed to all Gender Committee members. This document contains guarantees of protection against acts of sexual harassment and violence, definitions and complaints procedures. The Company also has a documented SOP for making complaints regarding sexual harassment and violence and abuse. The document is entitled Guidelines/Procedure in Lodging Complaints – Sexual Harassment, Violence and Abuse.
	6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented & communicated to all levels of the workforce. Major Compliance	YES	The Company also has a documented Social and Humanity Management Policy dated January 2015 signed by the Chief Executive – Group Plantations which specifies that the policy aims to preventing sexual harassment and other forms of violence against women and protect their reproductive rights, that the company respects the reproductive rights of women in accordance with national legislation. Female employees have been briefed on their reproductive rights, maternity benefits entitled to them, and requirement that women working with chemicals should inform the company if they are pregnant so they are allocated to other work. The policy documents were sighted at the notice board at the Mill and all Estates and briefed to the female workers during Gender Committee meetings. Interviews held with female employees (in the field and at the office) confirmed their understanding of their reproductive rights, including the rights to be transferred to another job if pregnant and not to deal with chemicals.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented & communicated to all levels of the workforce. Minor Compliance	YES	The company also has a Gender Committee Handbook issued on year 2014 which was prepared in Bahasa Malaysia and English, and a copy each was distributed to all Gender Committee members. This document contains guarantees of protection against acts of sexual harassment and violence, definitions and complaints procedures. The Company also has a documented SOP for making complaints regarding sexual harassment and violence and abuse. The document is entitled Guidelines/Procedure in Lodging Complaints – Sexual Harassment, Violence and Abuse.
C 6.10 Growers and millers deal fairly and transparently with smallholders and other local businesses.	6.10.1	Current and past prices paid for FFB shall be publicly available. Minor Compliance	YES	This Indicator is not applicable because the Rajawali Palm Oil Mill only receives FFB from its own supply within SOU 32 Rajawali, and Diversion crop from another RSPO Certified SOU which is SOU Derawan.
	6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented. Major Compliance	YES	It was evident that the Estates under Rajawali CU have the FFB price mechanism explained to its contractors.
	6.10.3	Evidence shall be available that all parties understand the contractual agreements they	YES	The Company has demonstrated that the contractor i.e. Boiler contractor, Maintenance contractor, FFB transporter, van & lorry rental, provided with a contract document. Interview conducted with the contractor confirmed its understanding on the agreement and payment system. The contractor also

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Clause	Indicators		Comply Yes/No	Findings
		enter into, and that contracts are fair, legal and transparent. Minor Compliance		confirmed that the contract was fair, legal and transparent.
	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance	YES	The contractor confirmed that all payments were made in a timely manner, i.e. approximately within one month of the issuance of invoice.
C 6.11 Growers and millers contribute to local Sustainable development where appropriate.	6.11.1	Contributions to local development that are based on the results of consultation with local comm. shall be demonstrated. Minor Compliance	YES	The contributions were documented in Corporate Social Responsibility Report. All of the event held evidences in the designated file come with photograph and invoices. The activities were held in all estates in Rajawali CU.
	6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. Minor Compliance	YES	Rajawali CU was not involved in any scheme smallholder schemes, and therefore this Indicator was not applicable.
C 6.12 No forms of forced or trafficked labour are used.	6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. Major Compliance	YES	From worker's interviews, there was no evidence of forced labour found. The estate workers interviewed informed that overtime was not excessive and they were not forced to carry out any overtime. It was confirmed also from overtime hours stated on sampled pay slips were within the legal limit of 104 hours per month. Any request for overtime work was mutually agreed with the workers. Foreign workers interviewed did not report of any incidences of trafficking or false information from recruiting agents in order to recruit them. From sample worker's contracts and interviews, there was no evidence of contract substitution found. Based on interview with workers, field observations, review of the employment contracts, records of wages, overtime payments, there is no evidence of any form of forced or trafficked labour within SOU 32 Rajawali.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	YES	The Company has a documented Social Policy and Social & Humanity Management Policy for temporary or migrant Workers dated January 2015 signed by the Managing Director – Group Plantations which states all employees should be treated fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and /or age for foreign workers. The policy was posted on the main estate notice board.
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented.	YES	The SOU 32 Rajawali adopts the Social Policy dated January 2015 which states that "All employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work and representation race, caste, nationality...". There is also a procedure entitled "Sourcing Process for Foreign Workers". Based on observations and interviews of foreign workers (harvesters, sprayers, mill workers), there is no evidence of contract substitution and no discriminatory practices against foreign

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Clause	Indicators		Comply Yes/No	Findings
		Major Compliance		workers. A post-arrival briefing is also given, in particular on the contents of their employment contracts, safety, benefits, etc.
C 6.13 Growers and millers respect human rights	6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations. Major Compliance	YES	The Company has a documented Social Policy and Social & Humanity Management Policy for temporary or migrant Workers dated January 2015 signed by the Managing Director – Group Plantations which states that believes in developing the businesses with a sense of humanity, while ensuring that they are socially beneficial and do not infringe on basic human rights. The paragraph also mentioned that the company recognize the rights of the employees, protect children's right and acknowledge gender privileges as well as the rights of indigenous people, local community and other stakeholders affected by their presence. This policy has communicated to internal and external stakeholder in every stakeholder meeting. The Policy was being displayed near public area such as meeting room, housing area, notice board has/has not been communicated to all level of workers and employee as seen from the muster briefing records.
	6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. Minor Compliance	YES	Rajawali CU provides Community Learning Centres (CLC) for foreign workers' children aged between 5 and 14. The Rajawali CU provides and bear the cost of the premises, houses for the teachers, free maintenance such as water, electricity, and repairs works. Teacher's wages bear by the Consulate. The CLCs within Rajawali CU are located near the Regional Office Bintulu premises and can be assessed by all foreign workers' children who would otherwise not have any formal education due to their citizenship status.

### **Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS**

Rajawali CU has no plan for any new planting and no new development of area was observed during the visit. Thus Principle 7 is not applicable. Auditors has verified through checking the [www.globalforestwatch.com](http://www.globalforestwatch.com), GOOGLE Maps, Estate Maps and also through site visit to all four estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Rajawali CU.

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

Clause	Indicators		Comply Yes/No	Findings
C 8.1 Growers and millers regularly monitor and review their activities, and develop and implement action	8.1.1	The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of		

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators		Comply Yes/No	Findings
plans that allow demonstrable continual improvement in key operations.		indicators covered by these Principles and Criteria. As a minimum, these shall include, but are not necessarily be limited to:		
	a)	Reduction in use of pesticides (Criterion 4.6);	YES	The CU adopted several continuous improvement in reducing of pesticides i.e. increasing planting of beneficial plants mainly <i>Tunera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> and continue to monitor pest through Early Warning System. The CU also adopted planting of <i>Leguminious</i> Cover Crop mainly <i>Pueraria Javanica</i> and <i>Calopogonium Mucunoides</i> at replanting area in order to minimizing circle and selective weeding. <i>Neproliphis biserata</i> was maintained and encouraged to be planted in Rajawali SOU. This can be seen in their continuous improvement plan. This was to suppress growth of noxious weeds and thus reduce the use of pesticides for selective weeding. Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced in order to encourage soft grasses in inter row and frond stacking area
	b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	YES	Environmental impact assessment, management action plans and continuous improvement plan for Rajawali SOU has been updated and monitored by management. Among the improvement actions: (a) construction of sump at chemical and workshop to prevent ground or water contamination. (b) collect back chemicals bags and allocate store for control of misused. (c) use of tray for tractor parking and workshop stations to prevent ground contamination
	c)	Waste reduction (Criterion 5.3);	YES	The management of Rajawali SOU had plan to reduce emission by daily inspection and monitoring for their farm tractor / lorry and genset / water treatment plant to prevent any leakage and problem which can impact on smoke emission.
	d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	YES	The management of both estates and mill had plan to reduce emission by daily inspection and monitoring for their farm tractor / lorry and gen set / water treatment plant to prevent any leakage and problem which can impact on smoke emission. The management of both estates and mill had plan to reduce emission by daily inspection and monitoring for their farm tractor / lorry and gen set / water treatment plant to prevent any leakage and problem which can impact on smoke emission.
	e)	Social impacts (Criterion 6.1);	YES	The CU continued to improve the social impacts with activities like: <ul style="list-style-type: none"> <li>• implementation of retention incentive for foreign workers.</li> <li>• constructing sheltered at morning muster area.</li> <li>• upgraded of <i>surau</i> and audio system.</li> <li>• organized social events for worker and communities, such Workers' Day celebration together with The Best &amp; Beautiful House Competitions.</li> </ul>

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Clause	Indicators	Comply Yes/No	Findings
	f) Encourage optimising the yield of the supply base  Major Compliance	YES	To optimise yields, both estates implemented best agricultural practices, inclusive of: <ul style="list-style-type: none"> <li>timely and proper fertiliser application and EFB &amp; Compost application</li> <li>Improving on accessibility to maximize crop evacuation</li> <li>expanding in field mechanized collection of FFB</li> <li>constructing water bodies and water conservation pits to conserve moisture</li> <li>reducing surface run off to prevent leaching of fertilisers</li> <li>paying harvesters incentives</li> </ul>

### RSPO Certifications Systems for Principles & Criteria June 2017

Clause	Indicators	Comply Yes/No	Findings
4.5.3 Time-bound plan  Note: Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;	(a) As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	Yes	SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.  <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. Socialization with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - <a href="https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioYJEAZ">https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioYJEAZ</a>  <b>PT Sandika Natapalma &amp; PT Budidaya Agro Lestari</b> Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing. As at June 2017, the smallholders with the total of 29,914 Ha (58% from the total Ha, 51,715 Ha) of associated smallholders in Indonesia has been certified. Certification process for the remaining associated smallholder's areas was on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and out growers by end 2020.  <b>PT Bersama Sejahtera Sakti</b> The new project at KKPA Maju Bersama by the plasma community is currently in nursery stage and not yet due for harvesting, the year of planting was in 2014.

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				<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 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. 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> <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 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	Yes	<p>Time bound plan was verified by CB and it can be confirmed that there were several changes to the current time bound plan as verified during this audit. Liberia has receive and extension of Timebound Plan which is until 2020 and PT Mitra Austral Sejahtera has been sold to PT Inti Nusa Sejahtera Refer letter dated 27 June 2019 to RSPO Secretariat and announcement at Bursa Malaysia <a href="http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965">http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965</a> .</p>

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



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		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;		
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6;	Yes	<p>Regular discussion was ongoing between Sime Darby Plantation and the group of community (PAC) through bi-monthly Tim Kerja Perwakilan Petani (TKPP) meeting since November 2012. In October 2013, representatives from two of nine villages (Kerunang and Entapang) left TKPP. These two villagers are supported by and working with TuK and OXFAM. They have then requested SDP to enter into Dispute Settlement Facility (DSF) in June 2014. Hence, there were two groups of communities: The TKPP (7 of 9 villages) and the Kerunang &amp; 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.</p> <p>As per current status (23/01/2019) SDP and affected parties will be resolved all the issues to proceed with legal review. <a href="https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail">https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail</a> However, sighted as at June 2019 PT Mitra Austral Sejahtera has been sold to PT Inti Nusa Sejahtera Refer letter dated 27 June 2019 to RSPO Secretariat and announcement at Bursa Malaysia <a href="http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965">http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965</a>.</p>
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	Yes	Based on the internal audit report, there were no labour dispute that are not being resolved through an agreed process for all uncertified units for all 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	Yes	Based on internal and external audit (ISPO certified) there was no labour disputed recorded at the CU.

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		with the requirements of RSPO P&C criterion 2.1;										
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 4.5.4 (a) – (d) above by the audit team based on self- declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:	Yes	SDP PT Mitral Austral Sejahtera already ISPO certified by MUTU Certification International on 30/11/2017 and there was no issue on legal non-compliance for all uncertified unit. However, Sighted as at June 2019 PT Mitra Austral Sejahtera has been sold to PT Inti Nusa Sejahtera Refer letter dated 27 June 2019 to RSPO Secretariat and announcement at Bursa Malaysia <a href="http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965">http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965</a>								
		<ul style="list-style-type: none"><li>A positive assurance statement is made, based upon self- assessment (i.e. internal audit) by organization. This would require evidence of the self- assessment against each requirement;</li></ul>	Yes	<table><tr><th>#</th><th>Name of SOU</th><th>Name of Units</th><th>Positive assurance statement and self-assessment</th></tr><tr><td>1</td><td>PT Sime Indo Agro</td><td>East Sei Mawang</td><td>Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor</td></tr></table>	#	Name of SOU	Name of Units	Positive assurance statement and self-assessment	1	PT Sime Indo Agro	East Sei Mawang	Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor
#	Name of SOU	Name of Units	Positive assurance statement and self-assessment									
1	PT Sime Indo Agro	East Sei Mawang	Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor									

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				2	PT Ladang rumpun Subur abadi	Subur Abadi Plasma 1	Internal assessment has been conducted for Subur Abadi Plasma 1 on 22 Feb 2017. The Subur Abadi Plasma 1 Scheme is currently undergoing RSPO Certification under PT Ladangrumpun Suburabadi pending certification. RSPO Pre-assessment has been completed on 20-24 March 2017. The contract between the Certification Body (PT Mutuagung Lestari) and PT Ladangrumpun Suburabadi is available (dated 6 March 2017) which includes the scope of the supply base of Subur Abadi Plasma stated under Clause 2, 1a. There is no outstanding land and social conflicts on the ground. HCV Assessment for Subur Abadi Plasma smallholders have been conducted (by Pollito) in July 2011 before commencement of any new planting. Land Use Change Analysis for the Plasma is in progress.
				3	PT Bersama Sejahtera Sakti	KKPA BSS	New smallholder project currently under preparation to undergo RSPO Certification by 2019, internal audit for PT BSS has been undertaken, the latest internal audit has been conducted on 21 Apr 18.
							There is no outstanding social and land conflicts on the ground. The plasma scheme has already undergone HCV Assessment (conducted by Pollito) in July 2011 before commencement of New Planting. Land Use Change Analysis is in progress.
				4	PT Bahari Gembira Ria	Plasma BGR	Confirmation of the status is in progress. Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Land Use Change Analysis has been completed for Plasma BGR.  Refer to RSPO Certificate & Report for PT BGR - <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>

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				5	PT Guthrie Peconina Indonesia	Sungai Jernih Estate and GPI KKPA	Sungai Jernih Estate and GPI KKPA were audited by Mutuagung as verified through Recertification Audit report. The assessment was conducted on 15 – 20 May 2017.	
				6	PT Sandika Nata Palma	Karya Palma KKPA SNP	Internal assessment was conducted on 10 Feb 2017.	
				7	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Sungai Putih (PT BAL) Beturus (PT BAL) KKPA BAL	Internal assessment was conducted on 18 - 23 Sept 2016. This PT also has conducted Stage 1 audit on RSPO Certification System, P&C RSPO (2016) and RSPO Supply Chain Certification Standard on 17 – 22 April 2017.	
							Smallholder project – targeted for certification by 2020.	
		<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 Refer letter dated 27 June 2019 to RSPO Secretariat and announcement at Bursa Malaysia <a href="http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965">http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965</a>				

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<p>4.6.4</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p>		No additional indicators	Yes	<p>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.</p>
<p>Note:</p> <p>1. For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&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>				

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### Attachment 4

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

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
Indicator 4.1.2	Major (Recurrence Minor)	<p><b>#NCR No : MN01/2019</b></p> <p>Requirement: 4.1.2: A mechanism to check consistent implementation of procedures shall be in place. Finding: A mechanism to check consistent implementation of weed control as per Section 16 of Agricultural Reference Manual was not demonstrated.</p> <p>Objective evidence: We found that in field 99SA, 99SB and 98SL of Samudera estate, the interline were still covered with woody growth (<i>Clidemia hirta</i>).</p>	<p><b>Corrective Action:</b></p> <p>To request for approval of additional Budget to complete the required spraying works.</p>	<p><b>Auditor Verification:</b></p> <p>Auditor has received evidence letter additional budget has been applied on 20/10/2019 and has been approved on November 2019. And auditor also verify the picture of block 99SA, 99SB and 98SL has been sprayed</p> <p><b>Status: Closed</b></p>

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Attachment 5

### RSPO SUPPLY CHAIN : AUDIT CHECKLIST

#### SECTION A : GENERAL INFORMATION

1. File Reference No.	: ES10171014
2. Name of facility/ site(s) /entity(ies)	: Sime Darby Plantations Berhad – SOU Rajawali
3. Site Location (single site/multisite/Group)	: KM 52, Jalan Bintulu/ Miri P.O. Box 673, 97008 Bintulu, Sarawak, Malaysia Malaysia
4. SC model	: Identity Preserved
5. Type of entity	: Mill / <del>Crusher</del> / <del>Refinery</del> / <del>Biodiesel plant</del> / <del>Primary Oleochemical</del> / <del>Secondary Oleochemical</del> / <del>End product manufacturer</del>  <i>For oleochemicals and its derivatives, please check the conversion factor against the “RSPO Rules for Oleochemicals and its Derivatives” dated 1st December 2016</i>
6. RSPO Member Number	: 1-0008-04-000-00
7. Annual summary records of certified oil palm products purchased and claimed	: Projected for last year for period of October 18 until September 19 CPO Projected: 33,554.19mt PK Projected: 7,158.23mt CPO Sell: 27,996.14mt CPO Claim as IP: 2,600mt CPO Claim as Non-RSPO: 25,396.14mt PK Sell: 6,508.67mt PK Claim as IP: 3,450.00mt PK Claim as Non-RSPO: 3,058.67mt

#### SECTION B : GENERAL CHAIN OF CUSTODY REQUIREMENTS FOR THE SUPPLY CHAIN

	Requirements	Remarks
<b>1</b>	<b>Applicability of the general chain of custody requirements for the supply chain</b>	
1.1	Organization takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors.	Rajawali POM has legal ownership and physically handles RSPO certified sustainable crude palm oil and palm kernel.

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1.2	Traders and distributors require a licence obtained from RSPO to sell RSPO certified product but do not themselves require certification. When selling RSPO certified product a licensed trader and/or distributor must pass on the certification number of the product manufacturer and the applicable supply chain model.	Not applicable due to Rajawali POM is processing facility.
1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform	Registered under name: Rajawali Oil Mill
1.4	Processing aids do not need to be included within an organization's scope of certification.	No processing aid involved in Rajawali POM scope of certification
<b>2</b>	<b>Supply chain model</b>	
2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	Rajawali POM has aware on the need to downgrading of supply chain model. Incoming FFB and products dispatch record was verified and confirmed no downgrading was implemented.
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Rajawali POM has continued to maintain Identity Preserved model.
<b>3</b>	<b>Documented procedures</b>	
3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:	<p>Rajawali POM had revised their documented procedure title '<i>Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001</i>', version 2, Issue 5 dated April 2019. The procedure described the following:</p> <ul style="list-style-type: none"> <li>• Clause 4.0 ~ the responsibility of for the implementation of RSPO SCC i.e. head of operating unit</li> <li>• Clause 5.0 ~ Control of document &amp; records such as weighbridge tickets, consignment note , training record &amp; contracts. Record retention for 10 years. Define the critical control point (CCP) :estate – weighbridge, mill – weighbridge, admin office, ramp, CPO despatch area, CPO storage tank. Kernel silos.</li> <li>• Clause 6.0 ~ Delivery of FFB from the estate – relevant record involved, flowchart for crop diversion, list of mill and their supply chain model i.e. IP or MB</li> <li>• Clause 7.0 ~ Receiving FFB at the mill – list of supply base, rules for</li> </ul>



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		<p>determining diverted FFB destination, relevant record</p> <ul style="list-style-type: none"> <li>• Clause 8.0 ~ Production of ISCC certified Waste/Residues – Follow SOP Separate Oil Recovery System</li> <li>• Clause 9.0 ~ process monitoring – for IP model mill need to ensure no mixing of RSPO certified and non-certified</li> <li>• 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,</li> <li>• Clause 11.0 ~ Non-conforming material / product – requirement to downgrade the RSPO Product</li> <li>• Clause 12.0 ~ product claim – shall follow RSPO rules on market communication &amp; claim</li> <li>• Clause 13.0 ~ Outsourced contractor - the mill has established list of outsourced contractor. Sighted list of transporter for CPO and PK.</li> <li>• Clause 14.0 ~ Training – the mill shall provide training for relevant personnel carrying the task at tech critical control point (CCP).</li> <li>• 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.</li> <li>• Clause 16.0 ~ Production volume</li> <li>• Clause 17.0 ~ Conversion Factors</li> <li>• Clause 18.0 ~ Internal Audit</li> <li>• Clause 19.0 ~ Complaints</li> <li>• Clause 20.0 ~ Management Review</li> </ul> <p>The procedure was kept in file RSPO Supply Chain Manual (SCM/RSPO/SD) Appropriate changes were also made in the change to include the new clause Production of ISCC certified waste/residues materials at the mill.</p>
a)	Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	Supply chain procedure was revised April 2019 (revision: 5) The Procedure was sighted and found all elements of the RSPO Supply Chain standard were covered.
b)	Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	Sighted CPO and PK production record, weighbridge report, dispatch record and training record was up to date and well maintained.
c)	Identification of the role of the person having overall responsibility for	The Assistant Manager and Weighbridge Operator have the overall responsible and

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	and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard.	authority over the implementation of RSPO supply chain requirement in RSPO Rajawali POM. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements.
3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <ol style="list-style-type: none"> <li>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>Effectively implements and maintains the standard requirements within its organization.</li> </ol> <p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct nonconformities shall be subject to management review at least annually. The organization shall be able to maintain the internal audit records and reports.</p>	RSPO internal audit was conducted in Sept 2019 by the internal auditor. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 1 Major and 2 Minor nonconformance report (NCR) and 3 OFI were raised by auditor. All NCR and OFI has been closed accordingly, auditor has found all of the corrective action has successfully address by the POM. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.
<b>4</b>	<b>Purchasing and goods in</b>	
4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> <li>The name and address of the buyer;</li> <li>The name and address of the seller;</li> <li>The loading or shipment / delivery date;</li> <li>The date on which the documents were issued;</li> <li>A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>The quantity of the products delivered;</li> <li>Any related transport documentation;</li> <li>Supply Chain certificate number of the seller;</li> <li>A unique identification number.</li> </ul> <p>Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents</p>	<p>RPOM 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 RPOM. They were Rajawali, Bayu, Samudera and Semarak Estates. The validity of the certificate of the supplier has been checked accordingly.</p> <p>Sighted FFB consignment note for Rajawali, Bayu, Samudera and Semarak Estates. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number.</p>

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	and specification documentation).	
a)	The site shall have documentation that demonstrate that purchases are made to the material category agreed with their supplier (IP, SG or MB).	<p>RPOM had continued to receive certified FFBs from the CU's own supply bases as well as non-certified FFBs from outsiders. There were four supply bases (estates) sending certified FFBs to RPOM. They were Rajawali, Bayu, Samudera and Semarak Estates.</p> <p>Sighted FFB consignment note for Rajawali, Bayu, Samudera and Semarak Estates. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Rajawali POM certify under the IP Model.</p>
b)	The site ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcement and Shipping Confirmation on the RSPO IT platform on the level of each shipment.	Rajawali POM has registered in IT platform
c)	A check of the validity of the Supply Chain Certification of suppliers for all sites that are SC certified. This shall be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements.	Rajawali POM had continued received FFB supply from own company estate namely Rajawali, Bayu, Samudera and Semarak Estate and diversion Crop from SOU Derawan.
4.2	The site shall have a mechanism in place for handling non-conforming material and/or documents.	<p>RPOM had started implementing the electronic system 'Simeweigh' to trace the volume of in-coming FFBs from the certified supply bases (estates). Every lorry load of certified FFBs leaving the certified estate was accompanied by a 'card'. On arrival at RPOM, the lorry driver surrendered the 'card' to the Weighbridge Clerk. The 'card' was then scanned and the relevant information on the certified FFBs was then captured and stored in a data base.</p> <p>On processing, RPOM still referred to the sales contract issued by the Headquarters office for production planning (Refer 9.0 of the SOP – Process Monitoring).</p>
<b>5</b>	<b>Outsourcing activities</b>	

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5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard.</p> <p><i>This requirement should not apply to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the organization (not the tank farm manager).</i></p>	<p>There is 1 outsource company CPO transporter i.e. agreement sign on 1<sup>st</sup> October 2019. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training was sighted.</p>
5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <ul style="list-style-type: none"> <li>a) The site has legal ownership of all input material to be included in outsourced processes;</li> <li>b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The responsibility is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</li> </ul>	<ul style="list-style-type: none"> <li>a) 1 outsource company CPO transporter i.e. agreement sign on 1<sup>st</sup> October 2019.</li> <li>b) There is contract document between Rajawali POM and the transporters. But there is another attachment stated that the contractor agree that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary on date 10/10/19.</li> <li>c) The RSPO Supply Chain procedure has described on outsource activity and briefed to the contractor on date 10/10/19.</li> <li>d) Inspection was carried out as additional effort to ensure no contamination sighted book at AP Post.</li> </ul>
5.3	<p>The site shall record the names and contact details of all contractors used for the processing or production of RSPO certified materials.</p>	<p>List of contact person for both transporters were made available and up-to-date.</p>
5.4	<p>The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or production of RSPO certified materials.</p>	<p>No new contractors used for the processing or production of RSPO certified materials.</p>
<b>6</b>	<b>Sales and goods out</b>	

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6.1	<p>The organization shall ensure that the following minimum information for RSPO certified products is made available in document form. Information must be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number;</li> <li>• A unique identification number.</li> </ul>	<p>The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Sime Darby Plantations Berhad and Global Trade Marketing Department (HQ) on behalf of Rajawali POM.</p>
<b>7</b>	<b>Registration of transactions</b>	
7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>• are supply chain actors between the mill and final refinery;</li> <li>• take legal ownership and physically handle RSPO Certified Sustainable oil palm products; and</li> <li>• are part of the supply chain of RSPO Certified Sustainable oil palm products</li> </ul> <p>must register their transaction in the RSPO IT platform at the time of physical shipment as required by the rules set by RSPO.</p>	<p>The registration of transaction being carried out by Group Plantation Marketing.</p> <p>Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).</p> <p>Sample of shipping announcement had been verified during the audit.</p>
<b>8</b>	<b>Training</b>	
8.1	<p>The organization shall have a defined training plan, which is subject to on-going review and is supported by records of the training provided to staff.</p>	<p>A defined training plan was established &amp; had been reviewed accordingly by the mill management. It involves various departmental function such as weighbridge, laboratory, production.</p>
8.2	<p>Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification system.</p>	<p>Training was conducted for workers in July 2019 by Manager SQM attended by 33 person including PIC, Clerk, Assistant Engineer, Staff, Weighbridge Operator and Attendance list &amp; photograph was seen.</p>

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	Training shall be specific and relevant to the task(s) performed.	The SQM Manager cum lead auditor has experience regarding SCCS almost 7 years and already trained by internal and external personnel.
<b>9</b>	<b>Record keeping</b>	
9.1	The site shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	Sighted CPO and PK delivery note, weighbridge ticket, production data and internal audit records were found up-to-date.
9.2	Retention times for all records and reports shall be a minimum of two (2) years and must comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Relevant record was maintained for more than 2 years
9.3	The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	Available.
<b>10</b>	<b>Conversion factors</b>	
5.10.1	Where applicable a conversion rate must be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which must be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ). This is in particular relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries. The guidance document for oleochemicals is available on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ).	OER and KER as the conversion rate.
10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	Actual on monthly basis.
<b>11</b>	<b>Claims</b>	
11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO rules on communications and claims.	Relevant information on product claim (including applicable SC model and certificate no.) being correctly indicated in the relevant outgoing paperwork. RPOM has not use any RSPO trademark.

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<b>12</b>	<b>Complaints</b>	
12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Rajawali POM has not receive any complaint from stakeholder Should there be any, they refer to External Communication in PQMS SOM Sub-section 5.5 Appendix 5.5.3.2.
<b>13</b>	<b>Management review</b>	
13.1	The organization is required to hold management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	The Supply Chain Procedure was revised April 2019 (rev. : 5), the said procedure was sighted and found all elements of the RSPO Supply Chain standard were covered which included - 20.0 Management Review. The Procedure was sighted and found all elements of the RSPO Supply Chain standard were covered and defined management review will be conducted once a year.
13.2	The input to management review shall include information on: <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO SCCS</li> <li>• Customer feedback</li> <li>• Status of preventive and corrective actions</li> <li>• Follow-up actions from management reviews</li> <li>• Changes that could affect the management system</li> <li>• Recommendations for improvement</li> </ul>	Management review meeting conducted in Sept 2019 (combine RSPO SC and MSPO traceability) <ul style="list-style-type: none"> <li>• Internal audit – NCR 1 Major, 2 Minor and 3 OF</li> <li>• Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result meet 100%%.</li> <li>• Status of preventive and corrective actions – no issues</li> <li>• Previous meeting – was highlighted</li> <li>• Changes - None</li> <li>• Recommendations – maintain current system with stringent follow up.</li> </ul>
13.3	The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes</li> <li>• Resource needs</li> </ul>	Output Improvement – maintain current practices Resource needs – maintain current practice.

### SECTION C : SUPPLY CHAIN MODELS *(to only use whichever is applicable)*

	<b>Module D – CPO Mills: Identity Preserved</b>	
<b>D.3</b>	<b>Documented procedures</b>	
D.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:  a) Complete and up to date procedures covering the	a) Available. b) The Assistant Manager and Weighbridge Operator have overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Rajawali POM. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements.

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	<p>implementation of all the elements in these requirements;</p> <p>b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p> <p>This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.</p>	
D.3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	Clause 7.0 of <i>SOP for Sustainable Supply Chain and Traceability</i> issue no 5 has described how the Rajawali POM manages the FFB from certified source. It was confirmed that no non-certified FFB was received by Rajawali POM.
<b>D.4</b>	<b>Purchasing and goods in</b>	
D.4.1	The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.	<p>Rajawali POM will only accept the RSPO certified FFB which are from Sime Darby's own estates i.e. Rajawali POM had continued received FFB supply from own company estate namely Rajawali, Bayu, Samudera and Semarak Estate and diversion Crop from SOU Derawan. Monitoring records titled as "RSPO &amp; MSPO Mass Balancing Records for Oil Mills" has recorded the tonnage of certified FFB and its supplying estate.</p> <p>Verified through Rajawali POM weighing system called 'SimeWeigh' and random sample of weighbridge ticket from Rajawali, Bayu, Samudera and Semarak Estate and diversion Crop from SOU Derawan. There was no non-certified FFB received based on the records only Diversion from Certified Estate such as Sahua, Damai Estate (SOU Derawan)</p>
D.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	<p>Based on records of FFB received and CPO &amp; PK produced, there was no overproduction observed.</p> <p>CPO projected : 33,554.19 - CPO produced: 28,155.91</p> <p>PK Projected: 7,158.23 – PK produced 6,626.10</p>
<b>D.5</b>	<b>Record keeping</b>	
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.	Rajawali POM has maintained the three-monthly accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record titled as " <i>RSPO &amp; MSPO Mass Balancing Record FY2019</i> ".
<b>D.6</b>	<b>Processing</b>	



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D.6.1	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from non-certified oil palm product including during transport and storage.	<p>Global Trading &amp; Marketing (GTM) Ara Damansara office informed Sime Darby Plantation Sdn.Bhd – Sime Darby Austral by e-mail on the dispatch of RSPO certified CPO from the supplying POMs (Rajawali). The dispatch of the RSPO certified CPO to SDO by the supplying POMs was made based on a specific contract.</p> <p>The receiving pit, pipelines and tanks in SDO were thoroughly cleaned, swept and flushed before RSPO certified CPO was pumped in to avoid contamination. Dedicated tanks were used to store RSPO certified CPO from Rajawali POM.</p> <p>For traceability of a specific batch of RSPO certified CPO back to the supplying POM, SDO kept the relevant documents such as the weighbridge ticket, CPO dispatch note, Dispatch oil quality ticket, Authorization from transporter, Borang MPOB L3, CPO dispatch authorization issued by the POM.</p>
D 6.2	The objective is for 100 % segregated material to be reached.	Rajawali POM does not accept any non-certified FFB. It was confirmed through summary of weighbridge ticket and interview with weighbridge operator. Therefore, CPO and PK can be considered 100% segregated.

### Module E – CPO Mills: Mass Balance – Not Applicable

## RSPO PUBLIC SUMMARY REPORT

### Attachment 6

#### VERIFICATION OF NON-CONFORMITIES DURING PREVIOUS ASSESSMENT AT RAJAWALI CU

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
Indicator 4.1.2	Minor	<p><b>#NCR No : STK 01 2018</b></p> <p>Finding: 1. A mechanism to check consistent implementation of weed control as per Section 16 of Agricultural Reference Manual was not demonstrated.</p>	<p><b>Corrective Action:</b></p> <p>Management would carry out Field upkeep in both the fields and would a plan for regular upkeep.</p>	<p><b>Auditor Verification:</b></p> <p>During the field visit , we found that in field 99SA, 99SB and 98SL of Samudera Estate, the interline were still covered with woody growth Clidemia hirta. Therefore a Major NCR No : MN01 2019 has raised against this iindicator. Since this was a recurring Minor NCR. <b>Status: Upgraded to Major</b></p>
Indicator 4.7.3	Major	<p><b>#NCR No : STK 02 2018</b></p> <p>Finding: 1. Not all appropriate protective equipment was used by workers at the place of work.</p> <p>Objective evidence: 1. Rajawali Estate and Semarak Estate: Some workers observed harvesting were not wearing helmets.</p>	<p><b>Corrective Action:</b></p> <p>Harvesters concerned will be issued warning letters. Harvesters would be retained on use of PPE.</p>	<p><b>Auditor Verification:</b></p> <p>Evidence of Refresher Training for harvesters conducted by the Estate Assistant Managers on 21.09.2018 on Rajawali Estate and on 25.09.2018 on Semarak Estate has been received. The training covered the use of various type of PPE and the importance in using them. Site visit to the office complex to observe the store management and the chemical mixing area evidenced that workers on duty were fully equipped with mask, rubber gloves, rubber boots &amp; apron. Auditor also verify at Rajawali Estate and Semarak Estate, and observed work harvesting</p>

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				and sighted the workers already wearing helmets and other PPEs as provided by the management Thus Past Major NCR STK02 -2018 was closed. <b>Status: Closed</b>
Indicator 6.5.1	Major	<p><b>#NCR No: HO 2</b></p> <p>Finding: There were pay to employees for wages and overtime payment documented on pay slips could not be confirmed met legal</p> <p>Objective evidence: There were pay of employee wages and overtime payment documented on the pay slips could not be confirmed met legal requirement. E.g.:</p> <ul style="list-style-type: none"> <li>a) Rajawali Estate: Pay for August 2018 – Employee No.: 138808, 138806. Records for confirmation of attendance and overtime yet to evidence.</li> <li>b) Semarak Estate: Pay for August 2018 – Employee No.: 118863, 138674, 45017, 138268. Records of attendance during muster not tally with input form to confirm attendance and overtime. And, paid overtime not tally with calculation.</li> <li>c) Bayu Estate: Employee No.: 127502, 37836, 124966. Paid overtime not tally with calculation.</li> </ul>	<ol style="list-style-type: none"> <li>1. To conduct briefing by HR personnel on the standarization of over time worked to the management teams.</li> <li>2. To show evidence of payment made/allocated for the workers on approved paid over time.</li> </ol>	<p><b>Auditor Verification:</b></p> <p>Pay and conditions are documented and made available during the surveillance audit. These are contained in the workers' payslips and employment contracts. Pay slips were sighted and are provided to workers on a monthly basis as confirmed during worker interviews. Pay slips for Mill and Estate field workers show breakdown for all work done such as allowances received, deductions, no. of days worked and for the Mill, any overtime hours performed.</p> <p>It was also verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages (Amendment) Order 2018 (from January 2019 onwards) and the Sarawak Labour Ordinance. Payslips for the months of January 2019, Jun 2019 and Aug 2019</p> <p><b>Status: Closed</b></p>

## RSPO PUBLIC SUMMARY REPORT

### ATTACHMENT 7 – Timebound Plan

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

Financial year (July – June)	Targeted	Achieved/Status	Attachments
<b>Jun-08</b>	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>
<b>2008/2009</b>	20 SOUs (from Malaysia and Indonesia)		
<b>2009/2010</b>	20 SOUs (from Malaysia and Indonesia)		
<b>2010/2011 (End Dec 2011)</b>	17 SOUs (from Malaysia and Indonesia)		

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

## RSPO PUBLIC SUMMARY REPORT

**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 Sebamban, KKPA Sg. Cengal, and Plasma TGK and SIA (East and West Plasma) are now RSPO certified with a production capacity of 465,602 mt of FFB. Total scheme smallholders hectares are 51,353 and total communities are 22,613.</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>—</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>

## RSPO PUBLIC SUMMARY REPORT

### SDP - RSPO Certification Status for Malaysia Operations

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

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

Legends:

Certification  
Withdrawal

## RSPO PUBLIC SUMMARY REPORT

### SDP- RSPO Certification Status for Indonesia Operations

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



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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	

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21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	28-Dec-22	MUTU-RSPO/018	
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	2-May-23	MUTU-RSPO/026	
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-24	MUTU-RSPO/044	
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab. Sanggau, Kalimantan Barat	NA	NA	NA	

### Legends

Pending Certification by RSPO

Mill closed down/Mothballed

NA - NOT APPLICABLE

## RSPO PUBLIC SUMMARY REPORT

### 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				

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		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				

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		Mamba Estate Mosa Oil Mill Kumbango Oil Mill Kapiura Mill Numundo Mill Waraston Mill Bebere Estate Kumbango Estate Togulo Estate Dami Estate				
6	West New Britain (WNB)	Waisisi Estate Kautu Estate Karausue Estate Moroa Estate Bilomi Estate Loata Estate Haella Estate Garu Estate Daliavu Estate Sapuri Estate Malilimi Estate Rigula Estate Nomundo Estate	NA	Kimbe, West New Britain, Papua New Guinea	Certified	10-Sep-08

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		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>
		Erap Estate	Sep-20		RaCP	<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>

## RSPO PUBLIC SUMMARY REPORT

### 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					