



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

File Ref. : ES10170017

RSPO PUBLIC SUMMARY REPORT

CLIENT : MEROTAI STRATEGIC OPERATING UNIT – SOU 30 MEROTAI

PARENT COMPANY : SIME DARBY PLANTATION BERHAD

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

LOCATION OF THE CERTIFICATION UNIT (MILL AND THE SUPPLY BASE):

(In the case of multisite certification, list additional sites in attachments) :

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
MEROTAI Strategic Operating Unit (SOU 30)	Merotai Palm Oil Mill	4° 23'N	117° 83' E	91007, Tawau, Sabah
	Merotai Estate	4° 23'N	117° 47' E	91007, Tawau, Sabah
	Tiger Estate	4° 25'N	117° 50' E	91007, Tawau, Sabah
	Table Estate	4° 22'N	117° 52' E	91007, Tawau, Sabah
	Imam Estate	4° 20'N	117° 50' E	91007, Tawau, Sabah

MAP : See Attachment 1

AUDIT DATE : 20-24 May 2019

DURATION : 20 auditor days

TYPE OF AUDIT : Annual Surveillance Audit No. 4

Recertification Audit

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

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

VALIDITY OF RSPO CERTIFICATE : 13/07/2015 – 12/07/2020

The following attachments form part of this report:

Non-conformity Report(s)

List of additional site(s)

Report by Audit Team Leader

Name : Rozaimée Bin Ab Rahman

Signature :

Date : 28/08/2019

Acknowledgement by Client's Representative

Name : MUSLIMIN BIN SULTA

Signature :

Date : 3/9/19

SIME DARBY PLANTATION (SINGAPORE) SDN. BHD.
 (Company No. 29959-V)
 MEROTAI ESTATE

MUSLIMIN BIN SULTA
 MANAGER

SUMMARY OF AUDITS

Stage 2 audit / Recertification audit			
On-site audit date :	15-18/12/14	No. of auditor days :	14
Audit team :	Valence (LA), Hazani, Jagathesan		
No. of major NCR :	3	Indicator: 2.1.1, 4.7.1 (g), 6.10.2	Closing date : 20/03/2015
No. of minor NCR :	2	Indicator : 2.1.4, 5.1.2	
Indicate the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers / Local communities
	x		x
	Contract workers	NGOs	Govt. agency
		x	x
Indigenous people	Contractor	Others (Please specify)	
	NA	x	
Supply base sampled :	All 4 Estates (Merotai, Table, Imam, Tiger)		

Annual Surveillance Audit 1			
On-site audit date :	18-21/4/16	No. of auditor days :	13
Audit team :	Hazani (LA), Razman, Selvasingam		
No. of major NCR :	1	Indicator:8.1.1	Closing date :3/6/18
No. of minor NCR :	2	Indicator :5.4.1, 6.5.3	
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers / Local communities
	x		x
	Contract workers	NGOs	Govt. agency
			x
Indigenous people	Contractor	Others (Please specify)	
	NA	x	
Supply base sampled :	Merotai and Tiger Estate		
Changes since the last audit :	Common rotation of managerial and middle management at operating units in the CU.		

Annual Surveillance Audit 2			
On-site audit date :	25-29 April 2017	No. of auditor days :	13.5 Auditor Days
Audit team :	Mohd Zulfakar Kamaruzaman (LA), Rahayu Zulkifli, Rozaimiee Ab Rahman		
No. of major NCR :	3	Indicator: 4.4.2, 5.3.2, 6.5.3	Closing date : 28/06/2017
No. of minor NCR :	3	Indicator :2.1.3, 4.8.2, 6.1.4	
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers
	X		X
	Contract workers	NGOs	Govt. agency
			X
Indigenous people	Contractor	Others (Please specify)	
		X	
Supply base sampled :	Table Estate and Imam Estate		
Changes since the last audit :	No Changes		
Justification of audit planning :			
Report approved by :		Approval date :	

Annual Surveillance Audit 3			
On-site audit date :	4 – 7 June 2018	No. of auditor days :	13.5 auditor day
Audit team :	Ruzita (LA), Razman, Amir, Norddin		
No. of major NCR :	3	Indicator : MRS 01 (4.8.2) , MRS 02 (6.1.4) RAG 01 (5.13.2 and 5.13.3)	Closing date : 30/8/2018
No. of minor NCR :	2	Indicator : MRS 03 (6.2.3) , MRS 04 (6.6.2)	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities
	X		X
	Contract workers	NGOs	Govt. agency
	X		X
	Indigenous people	Contractor	Others (Please specify)
	NA	X	NA
Supply base sampled :	Merotai and Tiger Estate		
Changes since the last audit :	No Changes		
Justification of audit planning :	<p>Total allocation of auditor days for Merotai CU were: 13.5 auditor days Mill = 3 days (2 day for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Merotai Estate = 3 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title. Tiger Estate = 3 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.</p>		
Report approved by :	Radziah Mohd. Daud	Approval date : 16/09/2018	

Annual Surveillance Audit 4			
On-site audit date :	20-24 May 2019	No. of auditor days :	20 days
Audit team :	Rozaimie Bin Ab Rahman (LA), Mohd Zulfakar, Ismail Adnan, Amir Bahari		
No. of major NCR :	2	Indicator: 1.1.2, 6.5.1	Closing date : 16/08/2019
No. of minor NCR :	2	Indicator : 4.1.2, 5.2.4	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities
	x		x
	Contract workers	NGOs	Govt. agency
	x		
	Indigenous people	Contractors	Others (Please specify)
	NA	x	
Supply base sampled :	Merotai Estate, Table Estate, Imam Estate, Tiger Estate		
Changes since the last audit :	No changes		
Justification of audit planning :	<p>Total allocation of auditor days for Merotai CU were: 13.5 auditor days Mill = 4 days (3 day for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Merotai Estate = 4 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title. Tiger Estate = 4 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title. Table Estate = 4 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title. Imam Estate = 4 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.</p>		
Report approved by :	Radziah Mohd Daud	Approval date : 28/08/2019	

SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period			April 2017- March 2018	April 2018 – March 2019	May 2019 – April 2020
Certified FFB Processed (MT)			242,353.75	233,134.12	230,184.84
Production of Certified CPO (MT)			56,347.52	53,478.64	48,118.90
Production of Certified PK (MT)			12,117.75	11,272.04	10,509.41
Certified Areas (Ha)			11,446.69	11,446.69	**11,597.67
Planted Areas (Ha)			10,431.89	*10,453.32	10,453.32
Production Areas (Ha)			9,693.77	9,496.84	9,240.78
HCV Areas / Conservation Areas (Ha)			161.23	161.23	161.23
REMARKS	*The planted area has been revised based on re-survey carried out for Tiger Estate. **Increased on certified areas in accordance with the total land title. Refer to NCR issued on indicator 1.1.2.				

TABLE 2

	PO	PK
Last years certified volume (MT)	53,478.64	11,272.04
Last years actual certified sold (MT)	1,000.48	9,378.20
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	49,619.23	563.49
New year certified volume (MT)	48,118.90	10,509.41

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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 accredited by ASI on 27 September 2014.

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Rozaimée Ab Rahman	Lead Auditor / Environment, GHG & TBP	Holds a B. Sc. in Agriculture from University Putra Malaysia. He had more than 5 years of working experience in the oil palm operation
Amir Bahari	Auditor GAP & Occupational Health and Safety	Possessed B. Sc (Hons) Chemistry from Universiti Sains Malaysia 1985. He has been in the Plantations Industry for 30 years having served Palm Oil Mills and Oil Palm Estates. He was involved in the auditing line since 2014 with experience in GAP, Mill Best Practices, RSPO, and Environmental & OHS.
Mohd Zulfakar Kamaruzaman	Auditor / Safety, HCV and 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.
Ismail Adnan bin Abdul Malek	Auditor HCV & Social	Holds a Master of Forestry degree from University of British Columbia, Canada. He had more than 25 years of working experience in the Natural Forest and Plantation Forest operations and management. He is a qualified Lead Auditor in MC&I (Natural Forest and Forest Plantation). He is also an Auditor for RSPO and MSPO (HCVF, Biodiversity, Social).

1.3 Audit methodology

The audit covered Merotai palm oil mill and 4 of its supply bases, namely Merotai Estate, Table Estate, Imam Estate and Tiger 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

The audit team has conducted interviews with relevant stakeholder during the on-site audit. Among the stakeholders consulted were the local communities from Kg. Hj. Matahir and Kg. Simpang Empat, foreign workers, canteen operator, sundry shops operator, mill suppliers, Department of Environment, estate mandore, gender representative, person in charge of Humana School and child care facilities, FFB transporters, independent smallholders, outgrower and surrounding FFB collection center.

1.5 Audit plan : Refer to Attachment 2

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

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Merotai Certification Unit (Merotai CU) is one of the Strategic Operating Unit (SOU) of Sime Darby Plantation Berhad (SDPB). Located in Tawau, Sabah, East Malaysia, the CU is also known as SOU 30. The CU was initially certified to the RSPO P&C by SIRIM QAS International Sdn Bhd in 2009 until 2014. However, since the renewal was not carried out prior to the expiry of the certificate, a new stage 2 was carried out in 2015 and was later certified again on 13 July 2015.

The Merotai CU comprises of the Merotai Palm Oil Mill (Merotai POM) and four supply base i.e. the Merotai Estate, Tiger Estate, Table Estate and Imam Estate. All the estates are owned by SDPB and were fully developed, hence, the principle 7 of the RSPO Principles & Criteria is not applicable. Merotai POM has a milling capacity of 90 mt/hr.

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

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

Table 1: Actual FFB production by the supply base for the last reporting period April 2018 to March 2019

Estates	FFB Production	
	Tonnes	Percentage (%)
Merotai Estate	78,008.760	23.23
Tiger Estate	48,152.990	14.34
Imam Estate	65,300.920	19.44
Table Estate	43,371.580	12.91
Total	234,834.25	69.92
3 rd Parties FFB Supplier (OCP)	101,031.140	30.08
Overall Total	335,865.390	100.00

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

CU own estates	FFB Contribution	
	Tonnes	Percentage (%)
Merotai Estate	52,871.44	15.32
Tiger Estate	65,012.28	18.83
Imam Estate	59,255.42	17.17
Table Estate	53,045.70	15.37
Total	230,184.84	66.69
Other Supply Bases		
Third parties (non-certified)	115,000.00	33.31
Grand Total	345,184.840	100.00

Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period
April 2018 to March 2019

RSPO Supply Chain Model : MB	Total (MT)
FFB Received	335,865.39
FFB Processed	335,865.39
Certified FFB Processed	234,834.25
Non-certified FFB Processed	101,031.14
Crude Palm Oil (CPO)	
Overall CPO Production	73,262.37
Certified CPO Production	50,619.71
Certified CPO delivered as RSPO certified	1,000.48
Certified CPO delivered as Conventional	49,619.23
Certified CPO delivered under other sustainable schemes	0.00
Credits traded through Books and Claim	0.00
Palm Kernel (PK)	
Overall PK Production	14,744.96
Certified PK Production	9,941.69
Certified PK delivered as RSPO certified	9,378.20
Certified PK delivered as Conventional	563.49
Certified PK delivered under other sustainable schemes	0.00
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
May 2019 to April 2020

RSPO Supply Chain Model : MB	Total (MT)
FFB Received	345,184.84
FFB Processed	345,184.84
Certified FFB Processed	230,184.84
Non-certified FFB Processed	115,000.00
Crude Palm Oil (CPO)	
Overall CPO Production	72,181.90
Certified CPO Production	48,118.90
Certified CPO delivered as RSPO	48,118.90
Certified CPO delivered as non-RSPO	-
Certified CPO delivered under other sustainable schemes	-
Palm Kernel (PK)	
Overall PK Production	15,765.41
Certified PK Production	10,509.41
Certified PK delivered as RSPO	10,509.41
Certified PK delivered as non-RSPO	-
Certified PK delivered under other sustainable schemes	-

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Merotai Estate	2,686.12	3,104.62
Tiger Estate	2,314.16	2,497.86
Table Estate	2,071.76	2,221.63
Imam Estate	3,381.28	3,773.56
Total	10,453.32	11,597.67

Table 6 Planting profile for Merotai Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1992	2nd	Mature	36.18	1.35
1995	1st	Mature	25.03	0.93
1995	2nd	Mature	46.23	1.72
1994	2nd	Mature	32.64	1.22
1996	1st	Mature	51.86	1.93
1998	1st	Mature	71.93	2.68
1999	2nd	Mature	155.87	5.80
2000	1st	Mature	317.16	11.81
2000	2nd	Mature	95.93	3.57
2001	2nd	Mature	234.54	8.73
2002	2nd	Mature	293.71	10.93
2004	3rd	Mature	84.67	3.15
2005	2nd	Mature	298.59	11.12
2007	2nd	Mature	303.06	11.28
2008	3rd	Mature	298.04	11.10
2009	3rd	Mature	193.68	7.21
2010	3rd	Mature	147.00	5.47
Total			2686.12	100

Table 7: Planting profile for Tiger Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1995	1st	Mature	74.13	3.20
1996	1st	Mature	45.89	1.98
1997	1st	Mature	369.02	15.95
1998	1st	Mature	945.04	40.84
1999	2nd	Mature	309.68	13.38
2007	2nd	Mature	109.03	4.71
2010	2nd	Mature	46.75	2.02
2016	2nd	Immature	197.07	8.52
2017	2nd	Immature	217.55	9.40
Total			2314.16	100

Table 8: Planting profile for Table Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1995	1st	Mature	28.08	1.36
1997	1st	Mature	340.16	16.42
1998	1st	Mature	1204.37	58.13
1999	1st	Mature	428.57	20.69
2015	2nd	Mature	70.58	3.41
Total			2071.76	100.00

Table 9: Planting profile for Imam Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1995	2nd	Mature	112.41	3.32
1996	2nd	Mature	4.72	0.14
2000	2nd	Mature	241.76	7.15
2001	2nd	Mature	14.90	0.44
2002	2nd	Mature	220.70	6.53
2004	2nd	Mature	240.60	7.12
2005	2nd	Mature	279.10	8.25
2008	2nd	Mature	230.84	6.83
2009	2nd	Mature	509.00	15.05
2010	2nd	Mature	328.00	9.70
2011	2nd	Mature	288.93	8.54
2014	2nd	Mature	112.40	3.32
2015	2nd	Immature	93.51	2.77
2017	2nd	Immature	259.55	7.68
2018	2nd	Immature	281.49	8.32
2019	2nd	Immature	163.37	4.83
Total			3381.28	100.00

2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

Name	:	Muslimin Sulta
Position	:	Manager / SOU Chairman
Address	:	PO Box 135, 91007 Tawau, Sabah
Phone no.	:	019-380 7332
Fax no.	:	089-902843
Email	:	ldg.merotai@simedarbyplantation.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 since the last assessment.

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

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

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

There was 3 SOU located in Indonesia, Papua New Guinea (NBPOL), and Liberia not yet certified. Details issues related to these were covered in the section - RSPO Certifications Systems for Principles & Criteria June 2017, in this report.

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

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

NA.

- 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 CU.

- 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.)

There were no changes since the last audit.

<p>3.4</p> <p>3.5.</p>	<p>Status of previous non-conformities *</p> <p>* If not closed, minor non conformity will be upgraded to major non conformity</p> <p>Complaint received from stakeholder (if any)</p> <p><u>There was no complaint received from external and internal stakeholders. Interviews covers workers, contractors, suppliers and surrounding communities. In general, all the interviewed stakeholders had given positive feedback on the CU.</u></p>	<p><input checked="" type="checkbox"/> Closed <input type="checkbox"/> Not closed*</p>
<p>4.0 DETAILS OF NON-CONFORMITY REPORT</p>		
<p>4.1</p> <p>4.2</p>	<p>For P&C (Details checklist refer to Attachment 3) :</p> <p>Total no. of minor NCR(s) (details refer to Attachment 4) List :2 RAR 01 2019, MZK 02 2019</p> <p>Total no. of major NCR(s) (details refer to Attachment 4) List :2 MZK 01 2019, IAM/1/2019</p> <p>For SC (Details checklist refer to Attachment 5) :</p> <p>Total no. of minor NCR(s) (details refer to Attachment 5) List :</p> <p>Total no. of major NCR(s) (details refer to Attachment 5) List :</p>	
<p>5.0 AUDIT CONCLUSION</p> <p>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.</p>		

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 90 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 : Rozaimee Bin Ab Rahman



16/08/2019

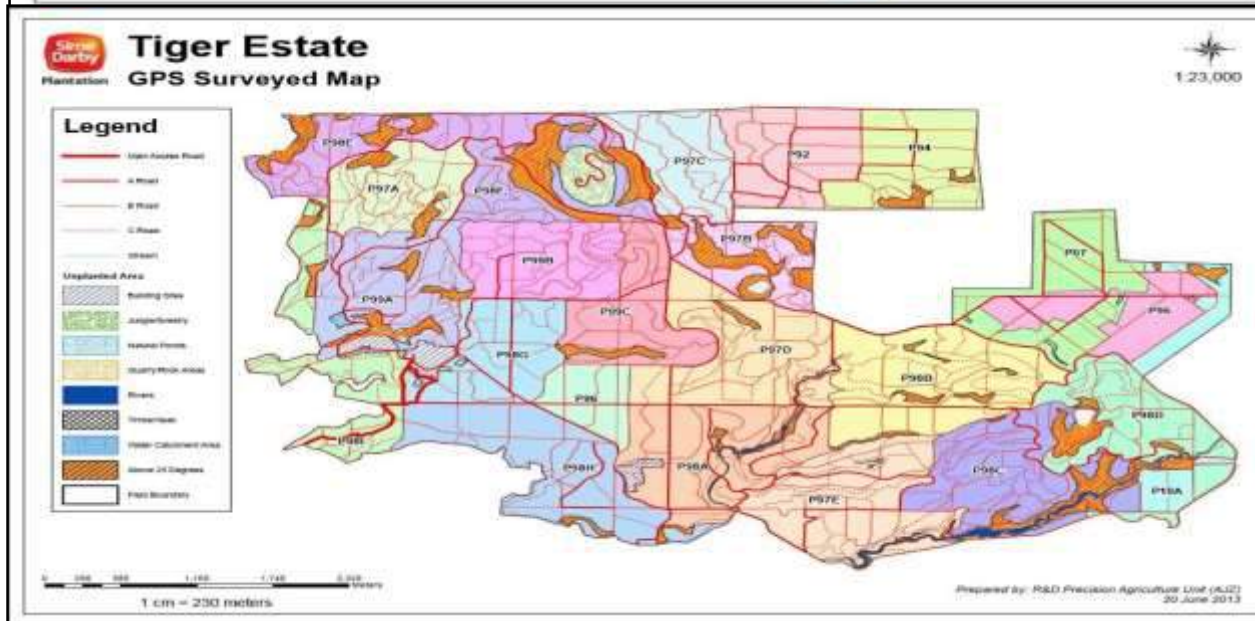
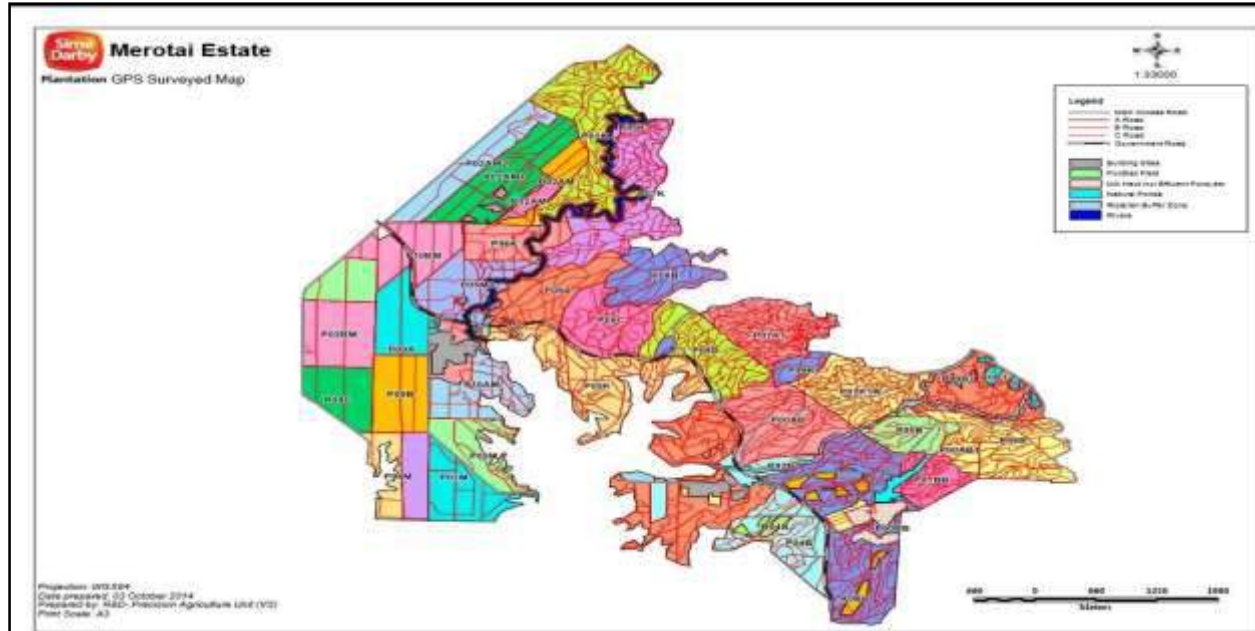
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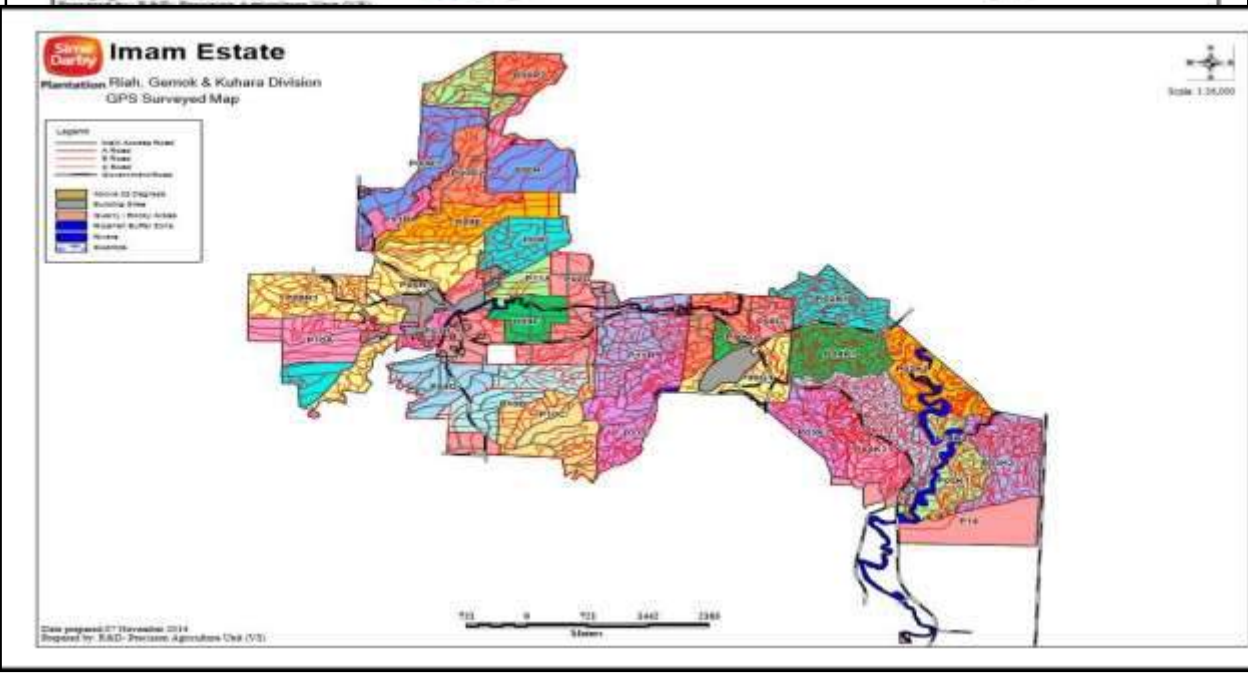
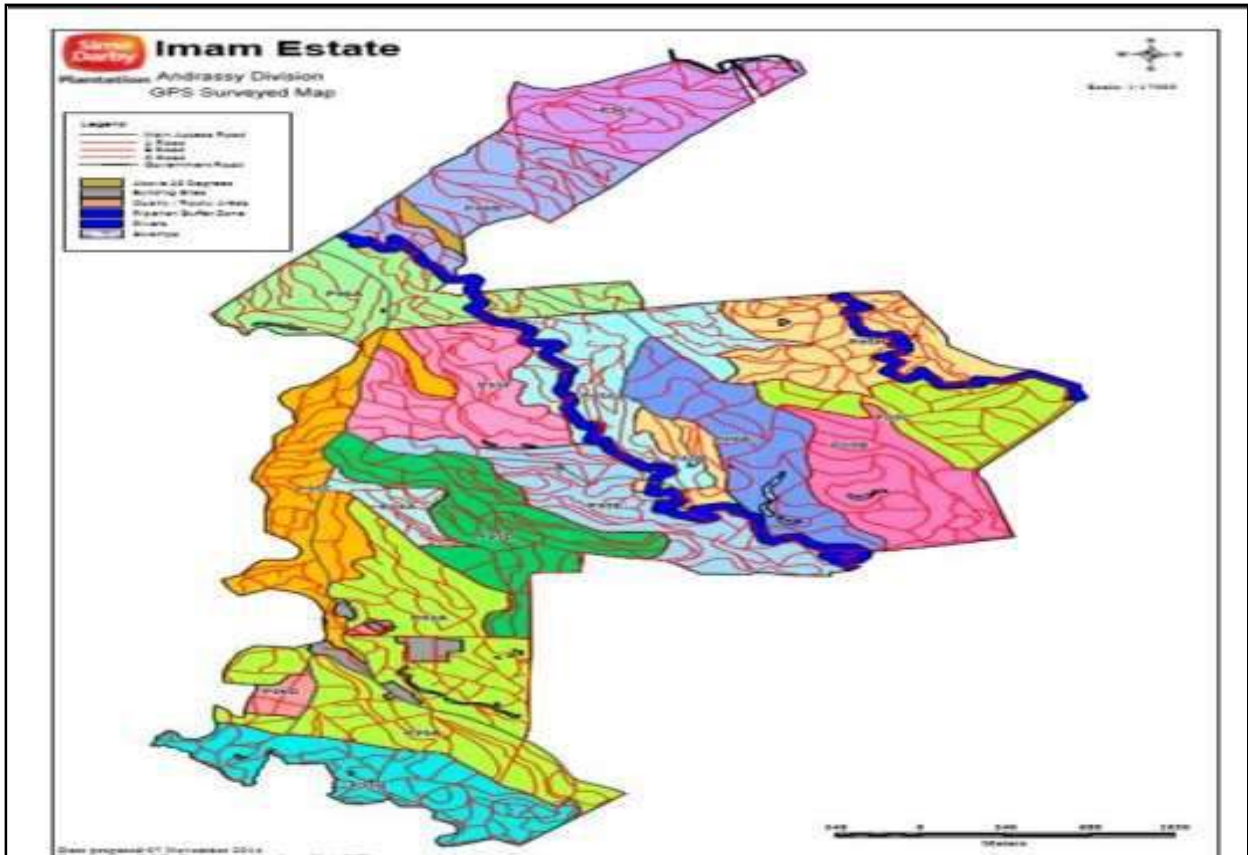
(Signature)

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Map of SOU Merotai

Merotai Estate





SURVEILLANCE 4 AUDIT PLAN

1. Objectives

The objectives of the audit are as follows:

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

2. **Date of assessment** : 20-24 May 2019

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

- Merotai Palm Oil Mill
- Merotai Estate
- Tiger Estate
- Table Estate
- Imam Estate

4. **Scope of Certification** : Production of sustainable crude palm oil and palm kernel using the Mass Balance supply chain model

5. Reference Standard :

- a. RSPO P&C MYNI:2014
- b. RSPO Certification Systems, June 20017
- c. RSPO Supply Chain Standard, 14 June 2017
- d. Company's audit criteria including Company's Manual/Procedures

6. Assessment Team

Assessor: Mr. Rozaimie Bin Ab Rahman (TBP, GHG, Environment) (RAR)
 Mr. Mohd Zulfakar Kamaruzaman (HCV, Environment, Supply Chain,) (MZK)
 Mr. Amir Bahari (GAP, Mill Practices, Safety) (MB)
 Mr. Ismail Adnan (Social) (IA)

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

7. Audit Method

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

8. Audit Findings

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

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

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

9. Confidentiality Requirements

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

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

10. Working Language : English and Bahasa Malaysia

11. Reporting

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

12. Facilities Required

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

13. Assessment Programme Details : As below

Date / Time	Coverage of assessment / Activity / Site	RAR	MZK	AB	IA
Day 0: 19 May 2019 (Sunday)					
14:30 – 17:20	• MH 2664 : Travelling day : KLIA - TAWAU	/	/	/	/
Day 1: 20 May 2019 (Monday)					
8.30am – 9.15am	Opening Meeting – Venue: Merotai POM Meeting Room <ul style="list-style-type: none"> • Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes • Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases , Time bound plan, actions taken to address previous audit findings. 	/	/	/	/
9.15am – 12.30pm	Site observation to Merotai POM P1, P2, P4, P5, P6, P8 <ul style="list-style-type: none"> • Verification of basic information mill • Milling practice • Legal compliance , Land titles user rights • Occupational safety & health aspects , chemical management • Environmental management, waste & chemical management <ul style="list-style-type: none"> • Land titles user rights • Social aspects - SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, safety committee, worker representative, contractors, supplier, contractor ,etc • Mill Practices RSPO Supply Chain 2017 <ul style="list-style-type: none"> • RSPO Supply chain standard implementation including model requirements 	/	/	/	/
12.30pm – 1.30pm	Lunch Break / Zohor Prayer	/	/	/	/
1.30pm – 5.00pm	Continue assessment at respective sites	/	/	/	/
5.00 pm	End of day 1 audit	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	RAR	MZK	AB	IA
Day 2: 21 May 2019 (Tuesday)					
8.30am – 12.30pm	Site observation at Merotai Estate P1, P2, P3, P4,P5, P6, P7, P8 <ul style="list-style-type: none"> • Good Agricultural Practice such as harvesting, spraying, POME application, IPM, New planting • Land titles user rights • Social aspects - SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, safety committee, worker representative, contractors, supplier, contractor ,etc • Occupational safety & health aspects , chemical management • Environmental management, waste & chemical management • Interview with workers, contractors etc. • Verification Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone 	/	/	/	/
12.30pm – 1.30pm	Lunch Break / Zohor Prayer	/	/	/	/
1.30pm – 4.45pm	Continue assessment at respective sites	/	/	/	/
4.45pm- 5.00 pm	Team discussion , End of day 2 audit	/	/	/	/
Day 3: 22 May 2019 (Wednesday)					
8.30am – 12.30pm	Site observation at Tiger Estate P1, P2, P3, P4,P5, P6, P7, P8 <ul style="list-style-type: none"> • Good Agricultural Practice such as harvesting, spraying, POME application, IPM, New planting • Land titles user rights • Social aspects - SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the CU 		/	/	/

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	<ul style="list-style-type: none"> • Interview with gender committee, safety committee, worker representative, contractors, supplier, contractor ,etc • Verification-of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Environmental management, waste & chemical management • Interview with workers, contractors etc. 	/			
12.30pm – 1.30pm	Lunch Break Zohor Prayer	/	/	/	/
1.30pm – 4.45pm	Continue assessment at respective sites	/	/	/	/
4.45pm- 5.00 pm	Team discussion , End of day 3 audit	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	RAR	MZK	AB	IA
Day 4: 23 May 2019 (Thursday)					
8.30am – 12.30pm	Site observation at Table Estate P1, P2, P3, P4,P5, P6, P7, P8 <ul style="list-style-type: none"> • Good Agricultural Practice such as harvesting, spraying, POME application, IPM, New planting • Land titles user rights • Social aspects - SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, safety committee, worker representative, contractors, supplier, contractor ,etc • Occupational safety & health aspects , chemical management • Environmental management, waste & chemical management • Interview with workers, contractors etc. • Verification Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone 	/	/	/	/
12.30pm – 1.30pm	Lunch Break / Zohor Prayer	/	/	/	/
1.30pm – 4.45pm	Continue assessment at respective sites	/	/	/	/
4.45pm- 5.00 pm	Team discussion , End of day 4 audit	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	RAR	MZK	AB	IA
Day 5: 24 May 2019 (Friday)					
8.30am – 12.30pm	Site observation at Imam Estate P1, P2, P3, P4,P5, P6, P7, P8 <ul style="list-style-type: none"> • Good Agricultural Practice such as harvesting, spraying, POME application, IPM, New planting • Land titles user rights • Social aspects - SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, safety committee, worker representative, contractors, supplier, contractor ,etc • Occupational safety & health aspects , chemical management • Environmental management, waste & chemical management • Interview with workers, contractors etc. • Verification Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone 	/	/	/	/
12.30pm – 1.30pm	Lunch Break / zohor prayer	/	/	/	/
1.30pm – 3.00pm	Continue assessment at respective sites	/	/	/	/
3.0pm- 4.00 pm	Team discussion ,	/	/	/	/
4.00 - 5.00 pm	Closing meeting	/	/	/	/

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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	Merotai CU has continued to implement the communication procedure. At the point of audit, there was no request for information from the stakeholders. Merotai POM, Merotai Estate and Tiger Estate management documents relating to environment, social and legal issues were made available to the public except for those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. Furthermore, SDPB had continued to use the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances were available through SDPSB website at http://plantation.simedarby.com
	1.1.2	Records of requests for information and responses shall be maintained. Major Compliance	NO	Merotai POM and all estates had identified personnel responsible for handling of complaints and records of communication were identified and maintained. The internal communication was kept in the Grievance Log Book/House Defect Book/ Summary of Complaint. For, external communication records of minutes of meetings held were maintained. The records such as official letter from authority such as Labour Department and the responses were maintained in the communication file. At the point of this assessment, there has been no request for such information by the public. Merotai CU continued to maintain records of requests for information and responses except for information on certified area. It has been noted that the information given by the CB regarding Certified Area at SOU Merotai was not correct as it did not tally with the Land Title. The Major NCR MZK 01 2018 was issued.
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	Copies of land titles to indicate the use right were available. Original copies of land titles were maintained at the Head Office in Kuala Lumpur.
		Occupational health and safety plans	Yes	SDP continued to use website for disseminating public information. Information relating to safety and health plans was available through SDP website at http://plantation.simedarby.com .
		Plans and impact assessments relating to environmental and social impacts	Yes	Plans and impact assessments relating to social impacts maintained available.
		HCV documentation summary	Yes	HCV documentation maintained available.
		Pollution prevention and reduction plans	Yes	Environmental Improvement Plan 2019. The plan also includes Pollution Prevention Plan which defined the detail actions, and the timeline. The status of the actions taken was monitored.
		Details of complaints and	Yes	Merotai POM, all Estates had identified personnel responsible for handling of complaints

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Clause	Indicators		Comply Yes/No	Findings
		grievances		and records of communication were identified and maintained.
		Negotiation procedures	Yes	Negotiation procedures for the Merotai CU is as described in the "Flowchart and Procedures On Handling Land Dispute".
		Continual improvement plans	Yes	Both the mill and estates established the continual improvement plans. This has been summarised and elaborated in the <i>Merotai</i> Mill Lean Six Sigma FY 2019.
		Public summary of certification assessment report	Yes	Public summary for RSPO certification assessment report can be assessed at the SIRIM QAS webpage.
		Human Rights Policy	YES	Sime Darby Plantation Berhad (SDPB) has developed a Social & Humanity Management Policy in Jan 2015. The policy was signed by the SDPB's Managing Director and copies of the same were observed displayed on various notice boards at the mill and the estates offices.
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	Merotai SOU 30 was bound by the Sime Darby Plantations Sdn Bhd's Code of Business Conduct (COBC). The COBC was printed in booklets for distribution. This policy was displayed at all visited sites such as at office notice board. Based on interview with staff and workers at the POM and all estates, they understand the content of this policy.

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 and regulations.	2.1.1	Evidence of compliance with relevant legal requirements shall be available. Major Compliance	Yes	Generally, SOU Merotai had demonstrated compliance with local, state, national and ratified international laws and regulations. Relevant licenses and permits such as DOE, DOSH, JTK 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. Randomly sampled foreign workers employed within the Merotai CU have valid passports and visit passes issued by the Immigration Department. For other Legal requirement, these legal were reviewed: Permit (JTK) to salary deduction, MPOB license, License "Menggaji pekerja bukan pemastautin", Permit to storage diesel, Trading license, Suruhanjaya Tenaga License, Fire Certificate etc. Other legal requirements were as follows: Steam Boiler and Unfired Pressure Vessel 1970, The Factories and Machinery (Notification, Certificate of Fitness and Inspection), Regulations, 1970 Regulation 10(2), Noise Exposure Regulations 1989, OSH (Use and

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Clause	Indicators		Comply Yes/No	Findings
				Standards Of Exposure of Chemicals Hazardous to Health Regulations 2000), Code of Practice in Confined Space 2010 etc.
	2.1.2	A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance	Yes	Merotai CU have identified and documented their legal register with written information on legal requirements applicable to their operation. PSQM Department, based at Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills.
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	Yes	A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units Merotai CU. SQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance.
	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. a) This was made via communication with the publisher of the documents. b) This mechanism was outlined in its procedure. c) The updating of the legal register is made on a periodical basis. d) Changes in the legal register if any are communicated to the respective CU.
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 Native Customary Right (NCR) land) and the actual legal use of the land shall be available. Major Compliance	YES	The legal ownership and the maps to indicate the boundary stone were sighted at Merotai, Table, Imam and Tiger Estate. The Land Title for All Estate has been verified, for all Estate (Merotai, Table, Imam, Tiger and POM), all the land title is originally from Borneo Abaca Limited and company has change their names to Bal Estates Sdn Bhd on 13/8/1985. The company has bought the land from Colony of North Borneo (Sabah Govt) on 4 th January 1937. The company then merge with Golden Hope Plantations (Sabah) Sdn Bhd on 14/11/1996. And soon after that, Golden Hope has merge with Sime Darby on 1/7/2008.
	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	Physical markers evident in Merotai CU.
	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	Yes	As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by SOU Merotai since 1951. The audit team had confirmed that there were no land issues related to previous owners.

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Clause	Indicators		Comply Yes/No	Findings
		available, and that these have been accepted with FPIC. Minor Compliance		
	2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes are implemented and accepted by the parties involved. Major Compliance	Yes	As reported in 2.2.1 of this checklist, it has been verified that the land is legitimately owned by SOU Merotai since 1951. Hence, there was no land conflict anticipated and no need for acceptable conflict resolution processes.
	2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities and relevant authorities where applicable). Minor Compliance	Yes	As reported in 2.2.1, it has been verified that there is no conflict or dispute over the land. Auditor has verified this through JCC, Gender and Stakeholder Meetings and interviewed with villagers and other oil palm plantation companies that there was no violence action taken by the SOU Merotai in maintaining peace. SOU Merotai has employed Auxiliary Police in order to guard their workers, staffs and children life, their belongings and company properties.
	2.2.6	To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations. Major Compliance	Yes	As reported in 2.2.1 of this checklist, it has been verified that the land is owned by SOU Merotai since 1951. Hence, there was no land conflict anticipated nor the need to avoid escalation of conflict is required. Auditor has verified this through JCC, Gender, SPIEU and Stakeholder Meetings and interview with settlers and other oil palm plantation companies.
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 (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (incl. neighbouring communities where applicable, and relevant authorities). Major Compliance	Yes	As reported in 2.2.1 of this checklist, SOU Merotai has been developed since 1951, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in Sime Darby Plantation HQ Office and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. Hence, there was no need for the establishment of map showing the legal, customary, or user right of other users as required by this indicator.
	2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include:	Yes	As reported in 2.2.1 of this checklist, SOU Merotai has been developed since 1951, after it was bought from the previous land owner; Colony of North Borneo (Sabah Govt). All the related documentation regarding the land acquisition was kept in Sime Darby Plantation HQ Office and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.

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Clause	Indicators		Comply Yes/No	Findings
	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;		
	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;		
	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. Minor Compliance		
2.3.3		All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. Minor Compliance	Yes	As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply SOU Merotai.
2.3.4		Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. Major Compliance	Yes	As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to SOU Merotai.

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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 (minimum three years) shall be documented. That includes, where appropriate, a business case for scheme smallholders. Major Compliance	Yes	The mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning.
	3.1.2	An annual replanting programme projected for a minimum of five years, with yearly review, shall be available. Minor Compliance	Yes	The long-range replanting program (LRRP) until 2024 was sighted for all the estates. This program is reviewed once a year and incorporated into their annual financial budget.

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

Clause	Indicators		Comply Yes/No	Findings
C 4.1 Operating procedures are appropriately documented, consistently implemented and monitored.	4.1.1	SOPs for estates and mills shall be documented. Major Compliance	Yes	Merotai CU adopted the following manuals / guidelines for the day-to day operations of the estates and mill. It includes the operation activities in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security.
	4.1.2	A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	NO	The mechanisms to check the implementation of procedures were carried out through internal audit, safety and health meeting and routine inspection (workplace inspection) by Assistant Managers, Engineers, field and office staff including the Medical Assistant. However, during site visits, Consistent implementation of procedure Schedule Waste (Clinical waste) was not in place. Thus #Minor NCR RAR 01 2019 has been raised.
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	Yes	The monitoring of the SOP implementation was closely made by the all levels of the supervisory personnel with records maintained and checked. The performances were summarized in a monthly report and annually. All the above records were kept for a minimum period of 12 months.
	4.1.4	The mill shall record the origins of all third-party sourced FFB. Major Compliance	YES	Merotai POM has received and recorded third party FFB as well as Sime Darby own FFB. It was confirmed through interviewed with weighbridge operator and sighted weighbridge summary record.
C 4.2 Practices maintain	4.2.1	There shall be evidence that good agriculture practices, as	YES	Merotai CU continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer applications. The

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Clause	Indicators	Comply Yes/No	Findings
soil fertility at or, where possible, improve oil fertility to a level that ensures optimal and sustained yield.	contained in SOPs, are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance		process of the fertilizer application follows a flow chart Fertilizer application, which was of upmost importance for maintenance of soil commencing from an agronomist visit for a leaf sampling to determine the level of nutrient therein. Thereafter the calculation will be made for an input of fertilizer to maintain/improve the nutrient at the desired level. Estates will use this input for the entire requirement in the field identified.
	4.2.2 Records of fertiliser inputs shall be maintained. Minor Compliance	YES	Fertilizer application program was monitored using records such as program sheets, bin cards, Field cost book, fertilizer application monitoring forms and Reconciliation of empty bags versus the issuance. Records of programs and applications of fertilizers were reviewed by auditors. Review of the records showed that the actual fertilizers applied in 2018 were in line with the program.
	4.2.3 There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	YES	The periodic tissue and soil sampling were carried out in the estates to monitor changes in nutrient status. The results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. Soil samplings are made on a 5 year cycle.
	4.2.4 A nutrient recycling strategy shall be in place, and may include use of EFB, POME, and palm residues. Minor Compliance	YES	Effluent application was confined to <i>Merotai Estate</i> being the nearest to the effluent pond. The EFB application records available.
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	The soil series for the 4 estates were identified. No peat.
	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	SDP had a management strategy in place for planting on slopes and to minimize and control erosion and degradation of soils. All the 4 estates had also implemented prevention of soil erosion measures such as construction of moisture conservation pits (MCP) in steep slope areas. Cover crops were observed to be in place as the CU management had generally encouraged the establishment of soft growth.
	4.3.3 A road maint prog shall be in place. Minor Compliance	YES	During the field visit, it was observed that the main and field roads of CU were in satisfactory condition and accessibility was made possible by regular maintenance.
	4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. Major Compliance	YES	All the 4 estates visited possessed NIL peat soil area. Hence this indicator is not applicable.

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Clause	Indicators	Comply Yes/No	Findings
	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	All the 4 estates visited possessed NIL peat soil area. Hence this indicator is not applicable.
	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	All the 4 estates visited possessed NIL peat soil area. Hence this indicator is not applicable.
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	The four estates had established and implemented their water management plans. Plans for 2019 were sighted.
	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	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at the Imam Estate and Table Estate. Riparian buffer zones have been identified and demarcated. No chemicals and fertilizer application observed been used in their maintenance. In some areas <i>vetiver</i> grass had been planted along the river banks. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (<i>Management of River Reserve in Sime Darby Plantation dated April 2014</i>).
	4.4.3 Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national regulations. Minor Compliance	YES	The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily. Merotai POM records of effluent monitoring for DOE submission in the ' <i>Borang Penyata Suku Tahunan</i> '.
	4.4.4 Mill water use per tonne of Fresh Fruit Bunches (FFB) shall be monitored. Minor Compliance	YES	Processing water is obtained from water catchment near to the mill. The mill water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis. Noted the high consumption of water in variation attributed to peak crop and mill cleaning during the monsoon months.
C 4.5 Pests, diseases, weeds and invasive introduced species	4.5.1 Implementation of Integrated Pest Management (IPM) plans shall be monitored. Major Compliance	YES	All the 4 estates in the CU continued to implement Integrated Pest Management (IPM). The estates continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by <i>the ARM</i> .

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Clause	Indicators		Comply Yes/No	Findings
are effectively managed using appropriate IPM techniques.	4.5.2	Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	YES	It was evident that trainings were provided to the employees on the IPM management and procedures.
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	All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II class III & class IV pesticides.
	4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) shall be provided. Major Compliance	YES	Merotai CU had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha.
	4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with IPM plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice. Major Compliance	YES	Merotai CU was committed to minimize the usage of agrochemicals through the implementation of IPM practices.
	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	YES	All the 4 estates confined usage of pesticides were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.

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Clause	Indicators	Comply Yes/No	Findings
	<p>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>		
4.6.5	<p>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>The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that SDS are available at all sites during the audit. Trainings on pesticide handling were available in all the visited estates.</p>
4.6.6	<p>Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes. Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974</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). a) Records of purchase, storage and use were maintained. b) All store buildings were equipped with exhaust fans with the door was secured. c) Only authorized personnel are assigned to handle the chemicals. d) All the chemicals were segregated in storage accordingly. Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Thereafter disposal arrangement will follow accordingly as per procedures</p>

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Clause	Indicators	Comply Yes/No	Findings
	(Act 149) and Regulations. Major Compliance		
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	YES	During the audit, it was noted that Merotai CU had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions. a) <i>Paraquat</i> usage has been prohibited in all units and the entirety of the organization. b) The Safety Procedures for pesticides application were well described in Pictorial Safety Standard.
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. Major Compliance	YES	Aerial application of agrochemicals is not practiced in the CU. This is confirmed through observation during the site visit, estate complex and interview with the employees.
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	Training on pesticide/chemical handling was continuously carried out at the CU. The trainings included the safety aspects and usage of PPE when handling with pesticides and herbicides. 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 involve and how the chemicals should be used in a safe manner. Records of training were sighted and given in 4.7.3
4.6.10	Proper disposal of waste material, according to procedures that are fully-understood by workers and managers shall be demonstrated. Minor Compliance	YES	The procedure on Scheduled Wastes (Hazardous Waste) Management has been established. Collection of SW was made by third party on completion of every vehicle servicing and disposal due date.
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. Major Compliance	YES	The recommendation from the CHRA is mainly on the training for operators working in laboratory, ETP, WTP, Boiler, workshop, scheduled waste and chemical store. In addition the assessor recommended medical surveillance be conducted for the categories of employees in the workshop and laboratory and chemicals handlers. Similar CHRA was compiled for the estates with details provided below. The CHRA report among others described requirement of medical surveillance to be made for the listed category of employees. The mill had plan another medical examination on in June 2019. Merotai Estate scheduled medical examination in May 19 awaiting results. Imam Estate has programmed the medical surveillance in June 19.

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Clause	Indicators		Comply Yes/No	Findings
	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	The 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. In interviews with the workers and staff during the site visit workshop, office compound, workshop, laboratory, engine room, boiler house) revealed that the employees had been briefed and had understood the policy.
	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 for the mill and estates was formalised on in 2008 with latest review made in March 2019 on the conveyor cleaning during slow down.
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practices. Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land	YES	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.

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Clause	Indicators		Comply Yes/No	Findings
		preparation, harvesting and, if it is used, burning. Major Compliance		
	4.7.4	The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. Major Compliance	YES	The letter of appointment for the Managers signed by the Regional CEO was sighted. The Managers subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the estates. Similar appointment was made for all the estates and the mill. All identified Executives were officially given a letter for such an appointment. All estates and the mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. 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 periodically reviewed. Minor Compliance	YES	Accident and emergency procedures are available in adherence to the SDPB policy on 'Crisis Management & Emergency Response' plan - chapter 13 of PQMS, OSH manual and "Accident and Reporting and Investigation Procedure" in chapter 14 of the same manual. Each estates and mill had procedures emergencies situation as listed below in the table. There was formation of ERP Team & ERP for all the identified incidences. The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training.
	4.7.6	All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	YES	SOU 30 Merotai provides medical care to Group Estate workers with Klinik Ladang Merotai established within the premises and more serious cases are referred to Hospital Tawau which is about 20 km from the Estates and Mill. SOU Merotai had continued to provide a group insurance for all workers as required under the Workmen Compensation Act 1992. Sighting of records and cross check with workers showed that they were covered with valid insurance policy. The local workers are covered by SOCSO. Similarly upon expiry of FW insurance coverage all FW will be registered for the coverage of SOCSO under the new Regulations.

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Clause	Indicators		Comply Yes/No	Findings
	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	YES	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKPP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKPP 8 a mandatory requirement for submission to DOSH by Jan of the subsequent year. Cases if any are reviewed during safety meetings.
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 Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. Major Compliance	YES	The training program for 2019 covering all aspects of the RSPO Principles and Criteria and other essential operations activities has been established. Regular assessments of training needs were available and verified. Training needs identification matrix has been established with target dates for of implementation.
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	YES	SOU Merotai had trained their staff, workers and records of training were kept in the RSPO training file. Among others the training held by the units in Merotai CU are listed in 4.7.3 above. Records of training for workers at the POM and all Estates were available during audit at Merotai CU.

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 have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are	5.1.1	An environmental impact assessment (EIA) shall be documented. Major Compliance	YES	Merotai CU EIA was documented.
	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/persons. Minor Compliance	YES	Action plan available.

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Clause	Indicators		Comply Yes/No	Findings
made, implemented and monitored, to demonstrate continual improvement.	5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. Minor Compliance	YES	The plans among others contain actions, responsibilities and timetable. The plans were reviewed annually by the management.
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 operations managed to best ensure that they are maintained and/or enhanced.	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	The report of "HCV Re-Assessment for Strategic Operating Unit (SOU) Sabah Central – South Zone" prepared by the PSQM Department was available to the audit team. The report was completed in January 2014 had covered all the High Conservation Value (HCV) within and adjacent to the CU. Total hectarage for HCV area at SOU Merotai was 23.72ha as per "HCV Re-Assessment for Strategic Operating Unit (SOU) Sabah Central – South Zone". However SOU Merotai management decide to declare their HCV area 161.23 ha by including the Buffer Zones and Planted area > 25 degree into the Conservation area and reported to CB.
	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	There was no RTE observed present in the SOU in the assessment
	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	YES	The CU has regularly educated its employees via morning muster briefing about the need to protect the RTE species. Appropriate disciplinary measures will be taken if found violated. Information pertaining RTE and relevant CU policies were displayed at the morning muster station.

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Clause	Indicators	Comply Yes/No	Findings
	company is found to capture, harm, collect or kill these species. Minor Compliance		
	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	NO	The CU had continued to monitor its HCV areas and presence of RTE. During the field audit, there was no presence of RTE in the areas found and the monitoring records also confirmed that no significant outcomes detected. On-going monitoring of the HCV area at Merotai Estate and Tiger Estate was conducted accordingly. <u>Merotai Estate</u> Auditor has verified the latest HCV monitoring activity for natural pond as recorded in the 'HCV Monitoring' book. It was found that Records of monitoring RTE species that are affected by plantation was not properly documented and reported Thus a Minor NCR MZK 02 2019 has been raised.
	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 were Six villages living nearby. It has been confirmed that that there was no HCV area in the CU area set-asides for local communities.
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 doc. Major Compliance	YES	All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2019.
	5.3.2 All chemicals and their containers shall be disposed of responsibly. Major Compliance	YES	Disposed in accordingly.
	5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented Minor Compliance	YES	There were 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 optimised.	5.4.1 A plan for improving efficiency of the use of FF 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 has 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. Explanatory notes were provided in all analysis if the utilisation surged or the reverse.

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Clause	Indicators		Comply Yes/No	Findings							
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	There was no land preparation in Merotai SOU by burning ever since SDPB practice zero burning as per the policy in EQMS and carbon policy.							
	5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Minor Compliance	YES	There was no evidence that fire had been used to prepare land for replanting in all estates. No open burning at all the visited replanting areas within the estates. Also, no fire was used for waste disposal.							
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	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent.	YES	The "Environmental Aspect & Impact Assessment Identification (EAI)" had included assessment of gaseous emissions, particulate/soot emissions and effluent.							
	5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	YES	Merotai CU had identified significant GHG (methane) emission from their effluent pond. Plan to minimise the emission was carried out through the establishment of the biogas plant. As todate, biogas plant has completed commissioning stage and start operation in May 2018, Gas methane from pond has been used to generate electricity for engine boiler.							
	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	Summary of net GHG emissions from PalmGHG calculator <ul style="list-style-type: none"> PalmGHG calculation option used: Option 1 Summary of Emissions <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Description</th> <th>tCO₂e/tProduct</th> <th>Extraction Rate</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>0.71</td> <td>OER</td> <td>21.57</td> </tr> </tbody> </table>	Description	tCO ₂ e/tProduct	Extraction Rate	%	CPO	0.71	OER
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Clause	Indicators		Comply Yes/No	Findings																																										
<p>reduce or minimise these emissions.</p> <p>Growers and millers commit to an implementation period until the end of December 2016 for promoting best practices in reporting to the RSPO, and thereafter to public reporting. Growers and millers make this commitment with the support of all other stakeholder groups of the RSPO. Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>				PK	0.71	KER	4.29																																							
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Principle 6: RESPONSIBLE CONSIDERATION OF EMPLOYEES AND OF INDIVIDUALS AND COMMUNITIES BY GROWERS AND MILLERS

Clause	Indicators		Comply Yes/No	Findings
C 6.1 Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance	YES	The SIA for CU Merotai was available. The assessment was carried out by PS-RSPO Unit, TQEM Dept, SDSB in Sept 2013. It covered the Merotai Palm Oil Mill, Merotai Estate, Imam Estate, Table Estate and Tiger Estate. The SIA Report was entitled "Baseline Social Impact Assessment (SIA), Sabah Zone, SOU 30" dated Sept 2013. Records of meetings were documented and made available during the audit. Among the stakeholders who attended were workers, staff, workers' union, suppliers, contractors, community heads and teachers.
	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	YES	Review of the SIA report and document review at Merotai POM, Merotai Estate, Tiger Estate, Table Estate and Imam Estate showed that the assessment has been carried out with the participation of the affected parties.
	6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. Major Compliance	YES	There was evidence that the action plans or " <i>Pelan Tindakan Sosial</i> " for 2019 has been developed at all estates and Merotai Palm Oil Mill through consultation with the affected parties as sighted by the auditor. The action plans were documented with timeline of each actions and the person-in charge. At all estates and Merotai POM, negative impacts and promotion of the positive ones, and monitoring of impacts were identified, with consultations with relevant stakeholders as explained in Indicator 6.1.2 and 6.1.4. Each unit within the CU mitigates negative impacts and promote positive ones by calling for meetings with their respective stakeholders. Meetings with the stakeholder included the Gender Committee meetings, OSH meetings and external stakeholders meetings. Based on minutes of the meetings, the issues raised were discussed and documented. These issues were subsequently incorporated into the SIA Action Plan for each unit.
	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	Each estate and Palm Oil Mill in Merotai CU has carried out an update of the SIA in 2018 or 2019 as specified in 6.1.3.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	YES	There was no smallholder schemes related with the CU.
C 6.2	6.2.1	Consultation and communication	YES	Consultation and communications procedures for Merotai CU were documented in the

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Clause	Indicators	Comply Yes/No	Findings	
There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties		procedures shall be documented. Major Compliance	SOP entitled "Procedure for External Communications" and made available at mill and estates.	
	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	Management officials at Estate and POM responsible for these issues were carried out via letters of appointment. Each appointment was for one or two years. The job scope of the appointees state that among other things that they are to investigate complaints, counsel and advice on social issues, assist in carrying out programmes or trainings on social issues.
	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 updated lists of stakeholders for Merotai Palm Oil Mill, Merotai Estate, Imam Estate, Table Estate and Tiger Estate were available and sighted during the audit. The lists were updated as and when there are changes.
C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties	6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. Major Compliance	YES	In Merotai SOU 30, the system used for resolving disputes exists in the procedure called "Procedure in Resolving Social Issues" ("Tatacara Perundingan Dalam Menangani Masalah Sosial"). This SOP is open to all stakeholders and aggrieved parties. Complaints were recorded in the Complaints Book / Laporan / Aduan Kampung Form for workers and Request Book for stakeholders. The book was accessible to all aggrieved parties, internal as well as external. An examination of the book at all Estates and POM showed that all the complaints were from internal stakeholders and related to house repairs. There were no complaints from external stakeholders.
	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance	YES	At all Estates and POM of Merotai SOU30, disputes are being resolved and the outcome made available as verified by the available evidence which included the following: At Merotai POM, all complaints were contained in the Grievance Log Book (internal and External Complaint) and House Defect Log Book (2019), and all complaints were attended to in a timely and appropriate manner.
C 6.4 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system	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. The procedure stipulates that workers issues be handled by Employee Relations, and the land issues by the Land Management Department, at Head Office. Both procedures stipulate the negotiation procedures, calculation and distribution of compensation to affected parties.
	6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be	YES	In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates for

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Clause	Indicators		Comply Yes/No	Findings
<p>that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>		<p>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</p>		<p>negotiation procedures to involve the respective estate management, Land Office, NGOs and the affected parties.</p>
	6.4.3	<p>The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. Major Compliance</p>	YES	<p>As of the date of the audit, no case of negotiation and payment of compensation has been carried out for verification.</p>
<p>C 6.5 Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages</p>	6.5.1	<p>Documentation of pay and conditions shall be available. Major Compliance</p>	NO	<p>For the Merotai Palm Oil Mill, Merotai Estate, Tiger Estate, Table Estate and Imam Estate, documentation of pay is in the form of monthly pay slips. Conditions of pay and employment are contained in the workers' respective employment contracts. Each pay slip documents the name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions (statutory such as EPF, SOCSO and non-statutory such as donation to mosque funds), net salary, annual leave and medical leave taken, etc. Interview with workers at POM and all Estates reveal that they understand the contents of the pay slips and seek explanation from the office whenever they needed any clarifications. It was noted that wages for Daily Rated Worker employed by Contractor (Ooi Trading) at Merotai Palm Oil Mill did not comply with Minimum Wage Order 2018. Also review of employment contract between Contractor "Syarikat Wawasan Merotai" for its workers at Imam Estate found Terms of wages and conditions of employment were not available in the employment contract. Therefore, a Major NCR (IAM-01 2019) against Indicator 6.5.1 is raised.</p>
	6.5.2	<p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions</p>	YES	<p>Contracts for local and Indonesian foreign workers recruited by Sime Darby Sdn Bhd at the Merotai Palm Oil Mill, Merotai Estate, Tiger Estate, Table Estate and Imam Estate were sampled and confirmed that all workers and the management signed a dated</p>

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Clause	Indicators		Comply Yes/No	Findings
		of employment shall be available in the languages understood by the workers or explained carefully to them by a management official. Major Compliance		contract of employment. The terms and conditions of employment are contained in the employment contracts and include duration of employment, place of work, salary, working hours, medical benefits, annual leave, sick leave, termination of service, and other benefits provided (housing, employment cost, etc). The newer version of employment contracts from SDSB which were in dual language (Bahasa Malaysia and English) was used. Workers recruited by Contractors also signed employment contracts prepared by the Contractors themselves which also include nature and duration of employment, place of work, salary, working hours, medical benefits, annual leave, sick leave, termination of service, and other benefits.
	6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible. Minor Compliance	YES	Adequate housing was provided by the Merotai Oil Palm Mill, Merotai Estate, Tiger Estate, Table Estate and Imam Estate. Site visits were carried out at the workers' housing. All houses have constant water supply and electricity which are provided free of charge. The houses were all in good conditions, and each house has between 2 – 3 bedrooms. Among other facilities provided are creche, pre-school, clinic where medical treatment and facilities are provided for free, sundry shops selling daily necessities such as rice, flour, sugar, cooking oil, etc. The workers' housing areas also have a mosque, a church, a community hall, a football field, and badminton/volleyball court. Workers interviewed confirmed that the houses and amenities provided are adequate, comfortable and requests for repairs were attended to in a timely manner.
	6.5.4	Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and affordable food. Minor Compliance	YES	Sundry shops near the workers' housing enabled workers' access to adequate, sufficient and affordable food.
C 6.6 The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of assoc. & collective bargaining are restricted under law, the employer facilitates parallel	6.6.1	A published statement in local languages recognising freedom of association shall be available. Major Compliance	YES	Recognition of freedom of association is available in the Sime Darby Plantation Social Policy dated in Jan 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 exhibited on notice boards.
	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	YES	The union that represents the workers of Merotai Palm Oil Mill, Merotai Estate, Tiger Estate, Table estate and Imam Estate is the Sabah Plantation Industrial Employee Union (SPIEU) Union membership is open to both local and foreign workers.

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Clause	Indicators		Comply Yes/No	Findings
means of independent and free association and bargaining for all such personnel.				
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 mill and estates employed anyone below the age of 18 years as verified in the Master Lists, or list of workers. Interviews with workers and staffs, as well as observations made during field visits show that those employed were above 18 years.
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 including identification of relevant/affected groups in the local environment shall be documented. Major Compliance	YES	The equal opportunities policy was contained within the Sime Darby Social Policy dated January 2015. The policy states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Social Policy was exhibited 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).
	6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. Minor Compliance	YES	Based on interview with management at the Merotai Palm Oil Mill, Merotai Estate, Tiger Estate, Table Estate and Imam Estate as well as sighting of job application forms, medical reports, and job interview notes, there was evidence that hiring selection were based on job vacancies, skills, suitability to the job, capabilities and medical fitness. Recruitments of workers were made based on vacancy, and the job availability is usually made verbally during weekly muster briefing, job advertisement placed near the security post and notice board. The interviews are conducted by Manager or Assistant Manager where an evaluation form is filled up to determine the suitability of the candidate. This form was sighted during the audit. The recruitment process of staff was coordinated at the regional office, who would then recommend to HQ for approval.
C 6.9 There is no harassment or abuse in the work place & reproductive rights are protected.	6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	The policy to prevent sexual and other forms of violence is contained in the Sime Darby Social Policy dated January 2015. This policy is implemented and communicated to all levels of workforce as follows:
	6.9.2	A policy to protect the	YES	The policy to protect reproductive rights of women is contained in the Sime Darby

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Clause	Indicators		Comply Yes/No	Findings
		reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. Major Compliance		Plantation Gender Policy. In addition, Gender Committees have been established at in the Merotai Palm Oil Mill, Merotai Estate, Tiger Estate, Table Estate and Imam Estate to implement and monitor the policy. Record show that all staff and workers on had been briefed by the CU. The Gender Committee meetings are used as an avenue to disseminate information to its members regarding reproductive rights. This was further confirmed during interviews held with female workers which showed their understanding of their reproductive rights.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. Minor Compliance	YES	A grievance mechanism which respects anonymity and protects complaints is in place at Merotai CU, as per the Sime Darby Gender Committee Handbook 1st Edition 2014. Employees are aware of the avenue and mechanism for lodging a complaint.
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	Merotai POM has displayed the current prices paid for FFB at the mill's weighbridge counter.
	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	The mill publicly displayed FFB pricing mechanism at the notice board. Smallholders who were mainly from the surrounding local community will refer to the notice board for the FFB price.
	6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. Minor Compliance	YES	It was evident that all relevant parties understood the content of the terms and condition of Purchase Order between the company and the mill and estates. The supplier had understood the content of the contract and agreed that the contract is fair, legal and transparent.
	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance	YES	All the FFB suppliers including smallholders, spare parts supplier and FFB transporters interviewed confirmed that all agreed payments were made in a satisfactory and timely manner.
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 communities shall be demonstrated. Minor Compliance	YES	Based on records, interviews and site verification, contributions made to local development were made based on the requests from the local communities, as the case may be.
	6.11.2	Where there are scheme smallholders, there shall be	YES	There was no smallholder scheme in the CU.

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Clause	Indicators		Comply Yes/No	Findings
		evidence that efforts and/or resources have been allocated to improve smallholder productivity. Minor Compliance		
C 6.12 No forms of forced or trafficked labour are used.	6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. Major Compliance	YES	Based on interview with workers and review of the employment contracts, records of wages, overtime payment, and rest day payments, there was no evidence of any forms of forced or trafficked labour within audited sites. Further, Sime Darby Plantation Sdn Bhd also adopts the Social and Humanity Management Policy dated January 2015 which committed to safeguarding operations from employing forced labour.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	YES	Based on interviews with foreign workers (kernel plant operator, lab assistants, harvesters, sprayers) at the POM and Estates during the audit, all of them were aware of the types of work they would be doing before they arrived in Malaysia. The actual job undertaken was the same as what they were informed about while they were still in their home country in Indonesia. No contract substitution has therefore occurred.
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance	YES	The Merotai CU adopts the Social Policy which stated that "All employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work and representation race, caste, nationality..". There is also a procedure entitled "Sourcing Process for Foreign Workers". Based on observations and interviews of foreign workers, there was no evidence of contract substitution and no discriminatory practices against foreign workers.
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 policy to respect human rights are documented in the Sime Darby Plantation's Social and Humanity Management Policy. This Policy states among others, that it will develop its businesses with a sense of humanity, ensuring that they are socially beneficial and do not infringe on basic human rights. This Policy was displayed on notice boards of the mill and the estates.
	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	The children of foreign workers at Merotai CU attend either the Humana school, or the Community Learning Centre (CLC), both of which are located at Imam Estate. The buildings were maintained by the Merotai Estate, as well as costs of water and electricity. Teachers' accommodation are provided by Merotai Estate.

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Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Auditors has verified through checking the www.globalforestwatch.com, GOOGLE Maps, Estate Maps and also through site visit to the estate areas i.e. Merotai Estate, Table Estate, Imam Estate, Tiger Estate. Based on the audit findings, it was confirmed that there were no new planting or new development of areas at Merotai CU. Hence, this principle was not applicable to the 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 plans that allow demonstrable continual improvement in key operations.	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 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	Merotai 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 Merotai CU. This can be seen in their continuous improvement plan. This was to suppress growth of noxious weeds and thus reduce the use of pesticides for selective weeding. Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced in order to encourage soft grasses in inter row and frond stacking area
	b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	YES	Merotai to improve continually its environmental management. Environmental action plans continued reviewed and implemented.
	c)	Waste reduction (Criterion 5.3);	YES	Merotai CU continued to have documented and implemented waste management plan. i.e. "Waste Management Action Plan". No wastes chemicals were observed. However, scheduled wastes, including empty agrochemical containers continued to be disposed as per applicable regulation. Domestic wastes continued disposed to landfill. Use of EFB for mulching and POME application as field irrigation.

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Clause	Indicators	Comply Yes/No	Findings
	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.
	e) Social impacts (Criterion 6.1);	YES	Social impacts were constantly updated based on inputs received from stakeholder consultations/meetings. This was evidenced in the minutes of the following meetings, and the updated Action Plans. These stakeholder meetings include Gender Committee meetings, OSH meetings and meetings with external stakeholders.
	f) Encourage optimising the yield of the supply base Major Compliance	YES	To optimise yields, both estates implemented best agricultural practices, inclusive of: timely and proper fertiliser application and EFB & Compost application, Improving on accessibility to maximize crop evacuation, expanding in field mechanized collection of FFB, constructing water bodies and water conservation pits to conserve moisture, reducing surface run off to prevent leaching of fertilisers, paying harvesters incentives

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Clause	Indicators	Comply Yes/No	Findings
4.5.3 Time-bound plan Note: Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;	(a) As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	YES	SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Indonesia PT Mitral Austral Sejahtera PT MAS undergone RSPO Main Assessment in July 2011. The certification body for PT MAS has considered that Sime Darby Plantation still meets the requirements of the RSPO report has been submitted for EB review. A verification audit was conducted by the Certification Body in early 2013 and Sime Darby Plantation will proceed with the next steps of resolution of the matter. Ongoing and regular (bi-monthly) discussions is ongoing between Sime Darby Plantation and the project affected communities. Reports on the progress regular basis since November 2012. The latest progress report submitted to RPSO dated 8 Sept 2017. SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat. As per current status (23/01/2019) SDP and affected parties will be resolved all the issues to proceed with legal review. https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail PT Bahari Gembira Ria Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to

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			<p>undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P9000001OioYJEAZ</p> <p>PT Sandika Natapalma & PT Budidaya Agro Lestari Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing.</p> <p>As at June 2017, the smallholders with the total of 29,914 Ha (58% from the total Ha, 51,715 Ha) of associated smallholders in Indonesia has been certified. Certification process for the remaining associated smallholder's areas was on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and out growers by end 2020.</p> <p>PT Bersama Sejahtera Sakti The new project at KKPA Maju Bersama by the plasma community is currently in nursery stage and not yet due for harvesting, the year of planting was in 2014.</p> <p>PT Ladang Rumpun Subu Rubadi SAP 1 Estate PLASMA will be undergone 2nd stage audit on 2019.</p> <p>PT Guthrie Pecconina Sungai Jernih Estate and the KKPA Estates has undergone audit.</p> <p>PT Sime Indo Agro Only East estate not yet certified – land legalization still in progress.</p> <p><u>Liberia</u> SDP has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was only completed conducted and put on-hold due to security & 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><u>Papua New Guinea (NBPOL)</u> Markham Farming Company Limited (MFCL) / Markham Agro Pte. Ltd. Estimate to be certified on year 2020.</p>
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				<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 full filled in order to achieve certification. The Disclosure has been has been initiated on 18.10.18. Currently HCV/HCS, SEIA and LUCA are being undertaken in order to submit and mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration.</p> <p>https://rspo.org/certification/remediation-and-compensation/racp-tracker no 82</p>
	(b)	<p>Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;</p>	YES	<p>Time bound plan was verified by CB and it can be confirmed that there were no changes to the current time bound plan as verified during this audit.</p>
	(c)	<p>Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);</p>	YES	<p>There were no changes to the current time bound plan as verified during this audit.</p>
4.5.4 Requirements for uncertified management units:	(a)	<p>No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;</p>	YES	<p>Based on internal and external audit (ISPO certified) there was no replacement of primary forest or HCV areas in the uncertified management unit. Except for NBPOL area which have potential liabilities of RSPO grower members and the stages of the Remediation and Compensation Procedures (RaCP) that the management units (MUs) are currently undergoing. https://rspo.org/certification/remediation-and-compensation/racp-tracker no 82</p>

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(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 & Entapang team (2 of 9 villages).</p> <p>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.</p> <p>https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail</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 8 uncertified units of Sime Darby Plantation Sdn Bhd - Indonesia as at December 2017.								
(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	Based on internal and external audit (ISPO certified) there was no labour disputed recorded at the CU.								
(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.								
	<ul style="list-style-type: none"> 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; 	YES	<table border="1"> <thead> <tr> <th>#</th> <th>Name of SOU</th> <th>Name of Units</th> <th>Positive assurance statement and self-assessment</th> </tr> </thead> <tbody> <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> </tbody> </table>	#	Name of SOU	Name of Units	Positive assurance statement and self-assessment	1	PT Sime Indo Agro	East Sei Mawang	Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor
#	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 - https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P9000001OioYJEAZ https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P9000001OioXOEAZ
				5	PT Guthrie Pecco nina Indonesia	Sungai Jernih Estate and GPI KKPA	Sungai Jernih Estate and GPI KKPA were audited by Mutuagung as verified through Recertification Audit report. The assessment was conducted on 15 – 20 May 2017.
				6	PT Mitra Austral Sejahtera (MAS)	MAS 1	Internal assessment was conducted on 9 - 10 Nov 2017 by PSQM Indonesia.
			MAS 2				
			MAS 3				
			Mas Factory Plasma MAS				
				7	PT Sandika Nata Palma	Karya Palma KKPA SNP	Internal assessment was conducted on 10 Feb 2017.
				8	PT Budidaya Agro Lestari	Pelanjau (PT BAL)	Internal assessment was conducted on 18 - 23 Sept 2016. This

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				<table border="1"> <tr> <td></td> <td>Sungai Putih (PT BAL)</td> <td rowspan="2">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.</td> </tr> <tr> <td></td> <td>Beturus (PT BAL)</td> </tr> <tr> <td></td> <td>KKPA BAL</td> <td>Smallholder project – targeted for certification by 2020.</td> </tr> </table>		Sungai Putih (PT BAL)	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.		Beturus (PT BAL)		KKPA BAL	Smallholder project – targeted for certification by 2020.
	Sungai Putih (PT BAL)	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.										
	Beturus (PT BAL)											
	KKPA BAL	Smallholder project – targeted for certification by 2020.										
	<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 	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"> Desktop study e.g. web check on relevant complaints 	YES	It was evident that in handling uncertified management unit, SDP engaged with TuK-Indonesia and continued to work on direct engagement with PAC in order to achieve the consensus with the PAC to address all unresolved issues.									
	<ul style="list-style-type: none"> If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. 	YES	Further information can be obtained from https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail									
<p>4.6.4 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p>	No additional indicators	YES	As it has been mentioned in 2.2.1 of this checklist, it was evident that the land including history of land tenure was verified during this audit. The land was previous own by Golden Hope and after merged with Sime Darby, The Land Title was transferred under the name of Sime Darby Plantation Berhad. Each estate had legal use of the land through an Ownership and Country Lease signed by the Director of Lands and Surveys of Perak following the payment of premium and Land fee.									

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Attachment 4

Details of Non-conformities and Corrective Actions Taken for RSPO P&C MYNI 2014

P & C Indicator	Specification Major/ Minor	Detail Non-conformances	Corrective Action Taken	Verification by Auditor
Indicator 1.1.2 MZK 01 2019	Major	<u>Finding :</u> Records of request and Information regarding Certified Area was found incorrect <u>Objective evidence :</u> The information given to CB regarding Certified Area at SOU Merotai since 2015 (Stage 2 Audit) was not correct due to not tally with stated Land Title.	Current estate hectarage will be referred from the latest updated in SEMUA hectarage system	Auditor has verified the details of information for every each of estates through SEMUA system Status: Closed The effectiveness of implementation will be verified during next audit
Indicator 4.1.2 RAR 01 2019	Minor	<u>Finding:</u> Consistent implementation of procedure Schedule Waste (Clinical waste) was not in place. <u>Objective evidence:</u> Lapse on disposal of waste items (15/12/2017 – 14/01/2019) and contractor (Sedafiat) of clinical waste was not in the DOE approval contractor (list of licensed scheduled waste facility / transporter).	-Management has requested from Sedafiat Sdn Bhd their DOE schedule waste facility and transporter license and has receive their DOE license which is valid until 30/04/2020 -Estate has checked in the Eswiss sytem that Sedafiat Sdn Bhd has a listed as one of DOE registered contractor -Plan / programme for disposal of clinical waste will be included in the estate waste management plan and to be monitored by estate management to ensure the clinical waste to be disposed in timely manner.	Corrective plan accepted. The effectiveness of implementation will be verified during next audit. Status: Open
Indicator 5.2.4 MZK 02 2019	Minor	<u>Finding :</u> Records of monitoring was not properly documented and reported. <u>Objective evidence :</u> Merotai Estate - Records of monitoring RTE species that are affected by plantation was not properly documented and reported	1. Action plan to identify and protect of wildlife (including RTE species) in the estate area will be included in the HCV action plan 2. Any sightings of RTE species in the estate area to be recorded in the HCV monitoring form / logbook.	Corrective plan accepted. The effectiveness of implementation will be verified during next audit. Status: Open

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			3. Training on HCV will be conducted to all workers and person in charge of HCV monitoring.	
Indicator 6.5.1 IAM/1/2019	Major	<p>Finding : Daily & hourly rate workers did not receive wages in compliance with Minimum Wage Order 2018 and details of wages and conditions of employment were not available in the employment contract</p> <p>Objective evidence :</p> <ol style="list-style-type: none"> 1. Wages for Daily Rated Worker of Contractor (Ooi Trading) at Merotai Palm Oil Mill did not comply with Minimum Wage Order 2018 (RM42.31/day) 2. Review of employment contract between Contractor "Syarikat Wawasan Merotai" for its workers at Imam Estate found Terms of wages and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) were not available 	<ol style="list-style-type: none"> 1. The respective contractors (Ooi Trading) provide the explanation on their workers payslips that did not complied with Minimum Wage Order 2018. 2. The respective contractor (Syarikat Wawasan Merotai) to provide with new set copy of revised employment contract for its workers that outline the required details (term wages and condition of employment). 3. Regional SQM to conduct briefing to the respective contractors with estates and mill management representative on the RSPO & MSPO requirement related to contractors. 	<ol style="list-style-type: none"> 1. Auditor has verified the evidence payment has been made by contractor to employees based on daily rates which is RM 35.00 + RM 15.00 = RM 50.00 2. Auditor has verified the employment contract which is indicated the term of wages condition which is meet the minimum wages order 2019. 3. Management has conducted a briefing for both contractors on 18/07/2019. Among of issues has been dissuuced such as minimum wages, contract agreement, PPE, etc. <p>Status: Closed The effectiveness of implementation will be verified during next audit</p>

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Attachment 5

SUPPLY CHAIN : AUDIT CHECKLIST

RSPO SUPPLY CHAIN : AUDIT CHECKLIST (INCLUDING MULTISITE /GROUP CERTIFICATION OPERATIONS)

SECTION A : GENERAL INFORMATION

1. File Reference No.	: ES10170017
2. Name of facility/ site(s) /entity(ies)	: Sime Darby Plantation Berhad – Merotai POM
3. Site Location (single site/multisite/Group)	: 91207 Kunak, Tawau, Sabah
4. SC model	: Identity Preserved
5. Type of entity	: Mill / Crusher / Refinery / Biodiesel plant / Primary Oleochemical / Secondary Oleochemical / End product manufacturer <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	: Actual Crop for last year period of April 18 until March 19 CPO Projected: 53,478.64mt PK Projected: 11,272.04mt CPO Sell: 50,619.71mt CPO Claim as MB : 1,000.48mt CPO Claim as Non-RSPO: 49,619.23mt PK Sell: 9,941.69 mt PK Claim as MB: 9,378.20 mt PK Claim as Non-RSPO: 563.49 mt

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

	Requirements	Remarks
	Audit Process Requirements – FOR STAGE 2 / RECERTIFICATION AUDIT	
5.3.8	The certification audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization seeking or holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard.	N/A

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Audit Process Requirements – SURVEILLANCE AUDIT		
5.3.26	<p>The surveillance audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard.</p> <p>In cases where an organization seeking certification outsources activities to independent third parties, a risk assessment shall be done by the CB to determine whether an audit of the sub-contractor is required. If the outsourced contractor holds RSPO Supply Chain certification, then it does not require an additional audit.</p>	<p>Merotai POM Organizational, management systems and the operational systems, documented policies and procedures of the organization holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard. 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/Residue Materials at the Mill. There was no evidence that Merotai POM seeking certification outsources activities to independent third parties.</p>

SECTION B (ii): GENERAL CHAIN OF CUSTODY REQUIREMENTS FOR THE SUPPLY CHAIN

	Requirements	Remarks
1	Applicability of the general chain of custody requirements for the supply chain	
1.1	<p>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.</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - For client with SG or IP in the scope, check the weighbridge system, packaging, receiving, loading and storage facility area. 	Merotai POM has legal ownership and physically handles RSPO certified sustainable crude palm oil and palm kernel.
1.2	Traders and distributors require a licence obtained from RSPO to sell RSPO certified product but do not themselves require certification. When selling RSPO certified product a licensed trader and/or distributor must pass on the certification number of the product manufacturer and the applicable supply chain model.	Not applicable due to Merotai POM is processing facility.
1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform	RSPO membership no : 1-0008-04-000-00 Registered under parent company: SIME DARBY PLANTATION BERHAD Register under name: Merotai Oil Mill
1.4	Processing aids do not need to be included within an organization's scope of certification.	No processing aid involved in Merotai POM scope of certification
2	Supply chain model	
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	Merotai POM has aware on the need to downgrading of supply chain model. However, this indicator was not applicable since this POM use MB model.

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	done in the following order: Identity Preserved -> Segregated -> Mass Balance. <u>Additional Guidance:</u> - For MB check the conversion factor used and the mass balance table.	
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Merotai POM decided to maintain the MB model for their supply chain system. Therefore, they are being audited against the general chain of custody requirement for the supply chain as well as Module E of the RSPO Supply Chain Standard.
3	Documented procedures	
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:	As above.
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. 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 and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard.	The Assistant Engineer have overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Merotai POM. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements.
3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. ii. Effectively implements and maintains the standard requirements within its organization. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct nonconformities shall be subject to management review at least annually. The organization shall be able to maintain the internal audit records and reports.	RSPO internal audit was conducted in Jan 2019 by internal auditors. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 4 Major 0 Minor nonconformance report (NCR) and 0 OFI were raised by auditor and closed in February 2019 was sighted by auditor.
4	Purchasing and goods in	
4.1	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	Merotai POM had continued to receive certified FFBS from the CU's own supply bases as well as non-certified FFBS from outsiders. Information needed available.

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	<p>form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number. <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 and specification documentation).</p>	
a)	<p>The site shall have documentation that demonstrate that purchases are made to the material category agreed with their supplier (IP, SG or MB).</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Obtain list of all suppliers and list of purchase orders/invoices issued to the suppliers - Check for agreement/contracts signed with suppliers - Sampling of purchase orders/invoices shall be done on a random basis and the minimum number of samples selected shall be based on the square root formula for each suppliers. - Ensure the purchase orders/invoices have the supplier's Supply Chain number. 	<p>Documentation that demonstrate that purchases are made to the material category agreed with their supplier available.</p>
b)	<p>The site ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcement and Shipping Confirmation on the RSPO IT platform on the level of each shipment.</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Request the PIC to demonstrate the use of the RSPO IT platform. 	<p>Merotai POM has registered in IT platform RSPO Palm Trace details are as followed; Member name: Merotai Oil Mill Member ID: RSPO_PO1000000064</p>
c)	<p>A check of the validity of the Supply Chain Certification of suppliers for all sites that are SC certified. This shall be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements.</p> <p><u>Additional Guidance:</u></p>	<p>Merotai POM 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 Merotai POM from own company estate namely Merotai Estate, Table Estate, Imam Estate, Tiger Estate and diversion Crop from SOU Binuang and SOU Giram.</p>

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	<ul style="list-style-type: none"> - Request for list of suppliers - Request the PIC to demonstrate where in the RSPO IT platform this can be found. 	
4.2	The site shall have a mechanism in place for handling non-conforming material and/or documents.	Merotai POM 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 MPOM, 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. On processing, MPOM still referred to the sales contract issued by the Headquarters office for production planning.
5	Outsourcing activities	
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><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Request for list of appointed subcontractors - Check on the availability of signed agreement or contract on the outsourced activity. 	There are 2 outsource company CPO and PK transporter. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training with outsourced transporter was sighted last was in May 2019..
5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <ol style="list-style-type: none"> a) The site has legal ownership of all input material to be included in outsourced processes; b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The 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. c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third 	There are 2 outsource company CPO and PK transporter .The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training was sighted.

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	<p>parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Check the signed agreement has included a provision as required in para (d) of this requirement. 	
5.3	The site shall record the names and contact details of all contractors used for the processing or production of RSPO certified materials.	List of contact person for both transporters were made available and up-to-date in the list of stakeholders.
5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or production of RSPO certified materials.	No new contractors used for the processing or production of RSPO certified materials.
6	Sales and goods out	
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"> • The name and address of the buyer; • The name and address of the seller; • The loading or delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number; • A unique identification number. <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Sampling of shipping documents shall be done on a random basis and the minimum number of samples selected shall be based on the square root formula for each customer - Conduct traceability verification during the audit. 	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 Merotai POM.
7	Registrations	
7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> • are supply chain actors between the mill and final refinery; • take legal ownership and physically handle RSPO Certified 	Merotai POM has legal ownership and physical handle RSPO certified sustainable CPO and PK.

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	<p>Sustainable oil palm products; and</p> <ul style="list-style-type: none"> are part of the supply chain of RSPO Certified Sustainable oil palm products <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>	
8	Training	
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>Additional Guidance:</p> <ul style="list-style-type: none"> - Availability of an approved annual training plan; and - Training record (training attendance list) 	<p>Training plan has included the RSPO Supply chain training scheduled in January 2019 and December 2019 for staff & workers.</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 shall be specific and relevant to the task(s) performed.</p> <p>Additional Guidance:</p> <ul style="list-style-type: none"> - Request the list of personnel involved in managing the RSPO SC system in the company - Check the training identified for the personnel and interview to verify the effectiveness of the training - Request for the training materials and check on the training effectiveness. 	<p>Training was conducted for in Jan 2019, attended by 5 person including QA, Office Clerk, Weighbridge Clerk, Auxiliary Police, and Assistant Engineer. Attendance list & photograph was seen.</p>
9	Record keeping	
9.1	<p>The site shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p>	<p>MPOM maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of the RSPO Supply Chain standard requirements. Also refer para 3.1b of this checklist for details.</p>
9.2	<p>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.</p>	<p>MPOM maintain retention period of more than 2 years (10 years) and this was to also comply with relevant legal and regulatory requirements.</p> <p>MPOM also had established various reporting template to ensure that they will be able to track movement of their certified FFB as well as finished products (CPO & PK).</p>
9.3	<p>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.</p>	<p>Merotai POM has projection record calculated from Black Bunch Census and allocated by the budget and the record was updated by year when do the budget.</p>
10	Conversion factors	

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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 (www.rspo.org). 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 (www.rspo.org). <u>Additional Guidance:</u> - For secondary oleoderivatives – the quantity based on molecular weight relative (refer to table 4 of the RSPO Rules for Oleochemicals and its Derivatives) to the primary oleochemical feedstock	The conversion factors were OER & KER.
10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate. <u>Additional Guidance:</u> - Request client to demonstrate the conversion factor used and check the mass balance table.	Actual performance used. Updated on monthly basis.
11	Claims	
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. MPOM has not use any RSPO trademark.
	RSPO RULES ON COMMUNICATIONS AND CLAIMS – NOT APPLICABLE General corporate communications	
12	Complaints	
12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints. <u>Additional guidance</u> - Procedure shall cover complaints from customers and stakeholders.	Merotai POM has established documented procedure to address collecting and resolving the complaint.
13	Management review	
13.1	The organization is required to hold management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Documented procedure has defined management review will be conducted once a year as stated in clause 20.0 Management Review in the SOP for Supply Chain and Traceability.

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13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO SCCS • Customer feedback • Status of preventive and corrective actions • Follow-up actions from management reviews • Changes that could affect the management system • Recommendations for improvement 	<p>Management review meeting dated in March 2019 : Internal audit – 4 Major</p> <ul style="list-style-type: none"> • Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result achieved. • Previous meeting – was highlighted • Changes • Recommendation for improvement – improve the established system
13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes • Resource needs 	<p>Recommendation for improvement – improve the established system Resource sufficient.</p>

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

	Module E – CPO Mills: Mass Balance	
E.3	Documented procedures	
E.3.1	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</p>	As above.
E.3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	MPOM had continued to implement the procedures it had on receiving and processing of RSPO certified and non-certified FFBs.
E.4	Purchasing and goods in	
E.4.1	The site shall verify and document the volumes of certified and non-certified FFBs received.	Merotai POM 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

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		certified FFBs to Merotai POM from own company estate namely Merotai Estate, Table Estate, Imam Estate, Tiger Estate and diversion Crop from SOU Binuang and SOU Giram. For non-certified FFBs, Merotai POM had received FFB from 25 outsider FFB suppliers.
E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	There was no overproduction of certified FFBs, CSPO and CSPK during the period under review.
E.5	Record keeping	
E.5 E.5.1	Record keeping a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis. b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The site can only deliver Mass Balance sales from a positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short (i.e. product can be sold before it is in stock)	Available.
E 5.2	In cases where a mill outsources activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.	MPOM was not involved in crushing of the kernels. All the kernel produced by MPOM was delivered to Sime Darby Kunak Bulking and Lahad Datu Edible Oil.

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Attachment 6

VERIFICATION OF NON-CONFORMITIES FROM PREVIOUS ASSESSMENT (ASA3)

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor
Indicator 4.8.2 MRS01	Major	<p>Records of training for social aspects were not available during audit at Merotai POM</p> <p>Objective evidence: Training records for social aspects was not available at Merotai POM as listed below:</p> <ol style="list-style-type: none"> 1. Human rights policy 2. Sexual harassment policy 3. Reproductive rights policy 4. Code of ethics 5. Grievance mechanism 	<p>Records of training for workers at the POM and all Estates were available during audit at Merotai CU. Based on training records verified, training on social aspects was implemented at Merotai POM on 17.5.2018, 19/7/2918, 20/7/2018 and 23/7/2018 which included the following topics:</p> <ul style="list-style-type: none"> • Human rights policy • Sexual harassment policy • Reproductive rights policy • Code of ethics • Grievance mechanism <p>Therefore, the NCR raised during the earlier Surveillance Audit is closed.</p>
Indicator 6.1.4 MRS02	Major	<p>Certain issues raised by stakeholders recorded in the Stakeholders Meeting & OSH Meeting were not updated in the SIA Action Plan</p> <p>Objective evidence :</p> <p><u>Merotai Estate</u> The SIA Action Plan titled 'Social Impact Management Programme for FY 2017/2018' was last updated on 14/8/2018. Although the action plan was updated regularly, some issues raised by the stakeholders during Stakeholders Meeting on 4/6/2018 was not incorporated in the SIA Action Plan such as:</p> <ol style="list-style-type: none"> 1. Kg. Simpang Tiga request to construct drain at the end of the village to prevent flooding. 2. Repair/fixing roof for sundry shop - Kedai Shukria 3. Monitoring of loafing culture (<i>budaya lepak</i>) and smoking by teenagers at CLC/Humana. <p><u>Tiger Estate</u> The SIA Action Plan titled 'Social Management Plan FY 2017/2018' was last updated in May 2018. Although the action plan was updated regularly, some issues raised by the stakeholders was not incorporated in the SIA Action Plan such as:</p>	<p>During this Surveillance Audit, a review of the 'Social Impact Management Programme for FY 2018/2019' at both Merotai Estate and Tiger Estate found the abovementioned issues had been incorporated into the Plans and actions had been taken by management in both estates. Hence, no NCR was raised on the issues. Status: Closed</p>

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		<p>1) Request from Sekolah Agama Rakyat Ladang Tiger to fix air conditioner (Stakeholders Meeting).</p> <p>2) Request to provide rubbish bin at Taman Impiana to avoid stray dogs (OSH Meeting – 12/12/2017).</p> <p>3) To repair road slope at housing area (OSH Meeting – 5/9/2017)</p>	
<p>Indicator 6.2.3</p> <p>MRS03</p>	<p>Minor</p>	<p>Stakeholders Meeting was not conducted at Merotai POM to response to the action taken for all issues raised by stakeholders during previous Stakeholders Meeting.</p> <p>Objective evidence : Merotai POM has yet to conduct Stakeholders Meeting with affected parties to response to the action taken for all issues raised during previous Stakeholders Meeting dated 13/4/2017.</p>	<p>In the previous Audit, the auditor has found that Merotai POM has yet to conduct Stakeholders Meeting with affected parties in response to the action taken for all issues raised during previous - gotong royong (Stakeholders Meeting dated 13/4/2017), However, in this Audit, it was evidenced that stakeholders meeting was carried out on 11th January 2019, hence, the Minor NCR MRS 03/2018 raised earlier is therefore, closed.</p>
<p>Indicator 6.6.2</p> <p>MRS04</p>	<p>Minor</p>	<p>Records of meeting between SPIEU or workers representatives with management was not available during audit.</p> <p>Objective evidence : <u>Merotai POM</u> Record of meeting between SPIEU or workers representatives with management for year 2018 was not available during audit. The latest meeting minute verified at mill was dated 6/1/2017.</p>	<p><u>Merotai Estate</u> The meeting between union (SPIEU), workers representatives and other relevant stakeholders with estate management was held on 19th February 2019. The auditor has found minutes of meeting between SPIEU and the estate management at Merotai Estate: <u>Merotai POM</u> The union (SPIEU) has conducted meeting with estate manager and workers representatives on 14th August 2018. <u>Tiger Estate</u> The union (SPIEU) has conducted meeting with estate manager and workers representatives on 14th August 2018. <u>Table Estate</u> The union (SPIEU) has conducted meeting with estate manager and workers representatives on 4th June 2018. <u>Imam estate</u> Estate management meeting with workers representatives was held on 12th July 2018</p> <p>Thus, this NCR is closed.</p>

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Attachment 7

**RSPO Certification Timebound Plan for Sime Darby Plantation (SDP)
As at Oct 2018**

MALAYSIA

No	Management Unit	Supply Base	Location	Certified Date	Remarks
	SOU Name				
1	Sg. Dingin	Sungai Dingin Oil Mill	Karangan, Kedah	12-Aug-11	
		Anak Kulim Estate			
		Sungai Dingin Estate			
		Somme Estate			
		Bukit Selarong Estate			
		Padang Buluh Estate			
		Bukit Hijau Estate			
		Jentayu Estate			
2	Chersonese	Chersonese Oil Mill	Kuala Kurau, Perak	5-Oct-11	
		Chersonese Estate			
		Kalumpong Estate			
		Tali Ayer Estate			
		Holyrood Estate			
3	Elphil	Elphil Oil Mill	Sg Siput, Perak	18-Jun-11	
		Kamuning Estate			
		Elphil Estate			
		Kinta Kellas Estate			
4	Flemington	Flemington Oil Mill	Teluk Intan, Perak	5-Oct-11	
		Flemington Estate			
		Bagan Datoh Estate			
		Sabak Bernam Estate			

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		Sg. Samak Estate			
		Seri Intan Oil Mill			
		Selaba Oil Mill			
		Seri Intan (+ Selaba) Estate			
5	Seri Intan/Selaba	Sabrang Estate	Teluk Intan, Perak	3-Mar-11	
		Sogomana Estate			
		Sg. Wangi Estate			
		Bikam Estate			
		Cluny (+ Bedford) Estate			
6	Tennamaram	Tennamaram Oil Mill	Bestari Jaya, Selangor	3-Mar-11	
		Tennamaram Estate			
		Sungai Buluh Estate			
		Bukit Talang Estate			
7	Bkt Kerayong	Bukit Kerayong Oil Mill	Kapar, Selangor	15-Apr-11	
		Bukit Kerayong Estate			
		Bukit Cheraka Estate			
		Elmina Estate			
8	East	East Oil Mill	Carey Island, Selangor	19-May-10	
		East Estate			
		Sepang Estate			
		Dusun Durian Estate			
9	West	West Oil Mill	Carey Island, Selangor	19-May-10	
		West Estate			
10	Bukit Puteri	Bukit Puteri Oil Mill	Raub, Pahang	7-Jul-11	
		Bukit Puteri Estate			
		Kerdau Oil Mill			
		Kerdau Estate			
11		Jentar Estate			

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	Kerdau	Mentakab Estate	Temerloh, Pahang		
		Chenor Estate		7-Jul-11	
		Sg Mai Estate			
12	Jabor	Jabor Oil Mill	Kuantan, Pahang	7-Jul-11	
		Jabor Estate			
13	Labu	Labu Oil Mill	Nilai, Negeri Sembilan	30-Dec-11	
		Labu Estate			
		New Labu Estate			
14	Tanah Merah	Tanah Merah Oil Mill	Port Dickson, Negeri Sembilan	19-May-10	
		Tanah Merah Estate			
		Bukit Pelandok Estate			
15	Sua Betong	Sua Betong Oil Mill	Port Dickson, Negeri Sembilan	18-Feb-14	
		Sua Betong Estate			
		Sengkang Estate			
		Bradwall Estate			
		PD Lukut Estate			
		Tampin Linggi Estate			
		Sg. Bahru Estate			
		Salak Estate			
		Siliau Estate			
16	Kok Foh	Kok Foh Oil Mill	Bahau, Negeri Sembilan		
		Muar River Estate			
		Sg. Senarut Estate			
		Sg. Gemas Estate			
		Kok Foh Estate			
		Bukit Pilah Estate		7-Jul-11	
		St. Helier Estate			
		Sungai Sabaling Estate			
		Pertang Estate			

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		Kempas Oil Mill			
17	Kempas	Kempas Estate	Jasin, Melaka	19-May-10	
		Tangkah Estate			
		Kemuning Estate			
		Diamond Jubilee Palm Oil Mill			
18	Diamond Jubilee	Serkam Estate	Jasin, Melaka	5-Oct-11	
		Diamond Jubilee Estate			
		Bukit Asahan Estate			
19	Pagoh	Pagoh Oil Mill	Muar, Johor	28-Jan-14	
		Pagoh Estate			
		Welch Estate			
		Lanadron Estate			
		Pengkalan Bukit Estate			
20	Chaah	Chaah Oil Mill	Chaah, Johor	18-Nov-10	
		Chaah Estate			
		Sg. Simpang Kiri Estate			
		North Labis Estate			
21	Gunung Mas	Gunung Mas Oil Mill	Kluang, Johor	19-May-10	* SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bk Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been incorporated in the RSPO Certification Scope of Gng. Mas.
		Gunung Mas Estate			
		Kempas Klebang Estate			
		Bukit Paloh Estate			
		Yong Peng Estate			
22	Bukit Benut	Bukit Benut Oil Mill	Kluang, Johor	5-Oct-11	* SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2018.
		Bukit Benut Estate			

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		Lambak Elaeis Estate			
		CEP Nyior Estate			
23	Ulu Remis	Ulu Remis Oil Mill	Layang-layang, Johor	11-Apr-11	
		Ulu Remis Estate			
		Cenas Estate			
		Bukit Badak Estate			
		Tun Dr. Ismail Estate			
		Pekan Estate			
		Sembrong Estate			
24	Hadapan	Hadapan Oil Mill	Layang-layang, Johor	29-Mar-11	
		Sri Pulau Estate			
		Kulai Estate			
		Layang Estate			
		CEP Renggam Estate			
26	Sandakan Bay	Tun Tan Siew Sin	Sandakan, Sabah	1-Oct-08	
		Tunku Estate			
		Tigowis Estate			
		Sentosa Estate			
		Segaliud Estate			
27	Melalap	Melalap Oil Mill	Tenom, Sabah	21-Jan-11	
		Melalap Estate			
		Sapong Estate			
28	Binuang	Binuang Oil Mill	Kunak, Sabah	16-Jan-09	
		Binuang Estate			
		Sungang Estate			
		Tingkayu Estate			
		Jeleta Bumi Estate			

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29	Giram	Giram Oil Mill	Kunak Sabah	16-Jan-09	
		Giram Estate			
		Mostyn Estate			
30	Merotai	Merotai Oil Mill	Tawau, Sabah	16-Jan-09	
		Merotai Estate			
		Imam Estate			
		Tiger Estate			
		Table Estate			
		Lavang Oil Mill			
		Lavang Estate			
		Rasan Estate			
		Belian Estate			
		Kelida Estate			
31	Lavang	Lavang (Special) Estate	Bintulu, Sarawak	30-Dec-11	
		Pekaka Estate			
		Ruai Estate			
		Dulang Estate			
		Charquest Estate			
		Paroh Estate			
32	Rajawali	Rajawali Oil Mill	Bintulu, Sarawak	30-Dec-11	
		Rajawali Estate			
		Samudera Estate			
		Semarak Estate			
		Bayu Estate			
33	Derawan	Derawan Oil Mill	Bintulu, Sarawak	30-Dec-11	
		Derawan Estate			
		Sahua Estate			
		Takau Estate			
		Damai Estate			

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34	Bintang	Bintang Oil Mill	Johor	NA	* SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1st Oct 2018, the mill has completed the selling off transaction.
Legends NA - NOT APPLICABLE					

INDONESIA

No	Management Unit SOU Name	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
1	PT LAHAN TANI SAKTI	Alur Damai Mill	-	Rokan Hilir District – Riau	Certified	16-Jan-12	
		Mustika Mill	-		Certified		
2	PT SAJANG HEULANG	KKPA-2 PT.SHE Estate	-	Tanah Bumbu District – South Kalimantan	Certified	3-Jul-13	
		KKPA-3 PT.SHE Estate	-		Certified		
		KKPA-5 PT.SHE Estate	-		Certified		
		Angsana Mill	-		Certified		
		Pantai Bonati Estate	-		Certified		
		Gunung Sari Estate	-	Tanah Bumbu District – South Kalimantan	Certified	9-Nov-16	
3	PT LADANGRUMPUN SUBURUBADI	SAP 1 Estate	2019		ST-2		LSI Plasma has been audited by the Certification Body.
		KKPA-1 PT.SHE Estate	-		Certified		
		KKPA-4 PT.SHE Estate	-		Certified		
		Bebunga Mill	-		Certified		
4	PT LANGGENG MUARAMAKMUR	Sungai Cengal Estate	-	Kotabaru District – South Kalimantan	Certified	16-Mar-12	
		Bakau Estate	-		Certified		
		KKPA Sungai Cengal Estate	-		Certified		

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		Sukamandang Mill	-		Certified		
5	PT KRIDATAMA LANCAR	Sapiri Estate	-	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	2-Sep-16	
		Barasdanum Estate	-		Certified		
		Kuala Kuayan Estate	-		Certified		
		Ladang Panjang Mill	-		Certified	9-Jul-12	Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P9000001OioYJEAZ
6	PT BAHARI GEMBIRA RIA	Ladang Panjang	-	Muaro Jambi District – Jambi	Certified		
		Plasma BGR Estate	2020		-		
		Manggala Mill	-		Certified		
		Manggala 1 Estate	-	Rokan Hilir District – Riau	Certified	25-Nov-10	
7	PT TUNGGAL MITRA PLANTATIONS	Manggala 2 Estate	-		Certified		
		Manggala 3 Estate	-		Certified		
		Pondok Labu Mill	-		Certified		
		Pondok Labu	-		Certified		
		Binturung Estate	-	Kotabaru District – South Kalimantan	Certified	16-Mar-12	
8	PT PARIPURNA SWAKARSA	Rampa Estate	-		Certified		
		Sesulung Estate	-		Certified		
		Gunung Aru Mill	-		Certified		

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		Gunung Aru	-		Certified		The new project at KKPA Maju Bersama by the plasma community is currently in
		Gunung Kemasan Estate	-		Certified		
9	PT BERSAMA SEJAHTERA SAKTI			Kotabaru District – South Kalimantan		21-Oct-16	Nursery stage and not yet due for harvesting, the year of planting was in 2014.
		Laut Timur Estate	-		Certified		
		Pantai Timur Estate	-		Certified		
		KKPA MBP	2019		-		
		Rantau Panjang Mill	-		Certified		
		Rantau Panjang	-		Certified		
		Bumi Ayu Estate	-		Certified		
10	PT GUTHRIE PECCONINA	Karang Ringin Estate	-	Musi Banyuasin District – South Sumatera	Certified	16-Mar-12	Sungai Jernih Estate and the KKPA Estates has undergone audit.
		Napal Estate	-		Certified		
		Mangun Jaya Estate	-		Certified		
		Sungai Jernih Estate and GPI					
		KKPA Estate	2020				
		Rantau Mill	-		Certified	30-Dec-11	
		Rantau	-		Certified		
11	PT LAGUNA MANDIRI	Betung	-	Kotabaru District – South Kalimantan	Certified		
		Matalok Estate	-		Certified	1-Apr-14	
		Sekayu Estate	-		Certified		
		Sekunyir Mill	-		Certified		
12	PT INDOTRUBA TENGAH	Sekunyir	-	Seruyan and West Kotawaringin District – Central Kalimantan	Certified	23-Nov-10	
		Seruyan Estate	-		Certified		
		Selabak Mill	-		Certified		
		Selabak	-		Certified		

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13	PT SWADAYA ANDIKA	Randi Estate	-	Kotabaru District – South Kalimantan	Certified	16-Mar-12	
		Sangkoh Estate	-		Certified		
		Lanting Estate	-		Certified		
		Sungai Pinang Mill	-		Certified		
14	PT BINA SAINS CEMERLANG	Sungai Pinang	-	Musi Rawas District – South Sumatera	Certified	11-Sep-12	
		Bukit Pinang Estate	-		Certified		
		Pemantang Mill	-		Certified		
		Pemantang	-		Certified		
15	PT TEGUH SEMPURNA	Kawan Batu Estate	-	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	9-Sep-16	
		Hatan Tiring Estate	-		Certified		
		Batang Garing Estate	-		Certified		
		Teluk Bakau Mill	-		Certified	1-Dec-16	
		Teluk Bakau	-		Certified		
16	PT BHUMIREKSA NUSA SEJATI	Mandah	-	Indra Giri Hilir District – Riau	Certified		
		Nusa Lestari Estate	-		Certified		
		Nusa Perkasa Estate	-		Certified	1-Apr-14	
		Rotan Semelur Estate	-		Certified		
17	PT ANEKA INTIPERSADA	Teluk Siak	-	Pekanbaru, Siak District – Riau	Certified	8-Dec-16	
		Pinang Sebatang Estate	-		Certified		
		Aneka Persada Estate	-		Certified		
18	PT TAMACO GRAHA KRIDA	Ungkaya	-	Morowali District – Sulawesi Tengah	Certified	10-Jul-12	
		Plasma TGK Estate	-		Certified		

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		Bukit Ajong Mill	-		Certified		
		West Estate	-		Certified		
19	PT SIME INDO AGRO	East Estate	-	Sanggau District –West Kalimantan	Certified	18-Jul-16	
		East* Estate	2019		-		Land legalisation process is still in process
		East Plasma Estate	-		Certified		
		West Plasma Estate	-		Certified		
		Blang Simpo Mill	2020		Certified		
		Tamiang (PT PPP) Estate	-		Certified		
20	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	Batang Ara (PT PSK) Estate	-	Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam	Certified	3-May-13	
		Blang Simpo-01 Estate	-		Certified		
		Blang Simpo-02 Estate	-		Certified		
		Lembiru Mill	-		Certified		Perijinan' process is ongoing
		Lembiru	-		Certified		
21	PT SANDIKA NATAPALMA	Awatan Estate	-	Ketapang District – West Kalimantan	Certified		
		Karya Palma Estate	2019		-		
		KKPA SNP Estate	2020		-	3-Jul-14	
		Pelanjau (PT BAL) Estate	2019				Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing
		Sungai Putih (PT BAL) Estate	2019				
22	PT BUDIDAYA AGRO LESTARI			Ketapang District – West Kalimantan	-		
		Beturus (PT BAL) Estate	2019		-		
		KKPA BAL Estate	2020		-		
		MAS Mill	2019		-		The case is under RSPO Complaints Panel
		MAS 1 Estate	2019		-		
23	PT MITRAL AUSTRAL SEJAHTERA	MAS 2 Estate	2019	Sanggau District – West Kalimantan	-	NA	Please find latest information on 'Updates on PT MAS' worksheet
		MAS 4 Estate	2019		-		
		Plasma MAS Estate	2020		-		

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INDONESIA – PT MAS UPDATE

RSPO Certification Target Date for PT MAS	The target date for certification was by 2017 subject to the progress of the matter being resolved.
Overview of RSPO Certification Progress for PT MAS	PT MAS has undergone RSPO Main Assessment in July 2011. The certification body for PT MAS has considered that Sime Darby Plantation still meets the requirements of the RSPO report has been submitted for EB review. A verification audit was conducted by the Certification Body in early 2013 and Sime Darby Plantation will proceed with the next steps of resolution of the matter. Ongoing and regular (bi-monthly) discussions is ongoing between Sime Darby Plantation and the project affected communities. Reports on the progress regular basis since November 2012. The latest progress report submitted to RPSO dated 8 Sept 2017. SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat.
Progress Updates	<p>Progress Update for PT MAS</p> <p>Regular discussion is ongoing between Sime Darby Plantation and the group of community (PAC) through bi-monthly Tim Kerja Perwakilan Petani (TKPP) meeting since November 2013. In October 2013, representatives from two of nine villages (Kerunang and Entapang) left TKPP. These two villagers are supported by and working with TuK and OXFAM. They have Dispute Settlement Facility (DSF) in June 2014. Hence, there are two groups of communities: TKPP (7 of 9 villages) and Kerunang & Entapang (2 of 9 villages). To-date, 28 TKPP meetings have been conducted. Issues related to the 14 demands are closed except for two items related to land matters which is ownership of nucleus plant and allocation of plasma farm within the plasma original village/customary area. The most recent meeting was held on 27 July 2018.</p> <p>SDP is engaging with the local authority on this matter together with TKPP. The latest TKPP meeting discussed mainly on operational issues especially on security issues.</p> <p>Engagement with RSPO: Sime Darby Plantation is submitting a monthly basis report to RSPO on the case. Five monthly updates/ responses have been submitted to RSPO to-date. It is noted that on 26 September 2017, the Complaints Panel has convened and has issued a letter related to the issue of Sime Darby's plans to divest its operations.</p> <p>On 3 October 2017, the Complaints Panel's issued a response on Sime Darby's plans to divest its operations (PT MAS). To-date, Sime Darby Plantation is submitting monthly updates/responses to RSPO Secretariat on the matter with the latest submission on 28 May 2018.</p> <p>RSPO has written to SDP on 17 Aug 2018 mentioning that the Complaints Panel as part of its deliberation had directed both parties, the Communities (supported by TuK) and Sime for a meeting for the purposes of verifying the progress of the complaints, specifically the status of the 14 demands. The tripartite meeting between the communities, SDP and RSPO.</p> <p>Engagement with TuK-Indonesia: SDP continues to work on direct engagement with PAC – working towards a consensus with the PAC to resolve the issues. Further information can be obtained from http://www.rspo.org/members/complaints/status-of-complaints/view/29</p>

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NBPOL

Management Unit	SOU Name	Time Bound Plan	Location	Status	Certified Date	
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	NA	Guadalcanal Province, Solomon Islands	Certified	18-Mar-11
		Tetere Estate				
		Ngalimbiu Estate				
		Mbalisuna Estate				
		Outgrowers – West Zone				
		Outgrowers – Central Zone				
		Outgrowers – MBA East Zone				
		Outgrowers – MBE East Zone				
2	Milne Bay Estates (MBE)	Hagita Oil Mill	NA	Milne Bay Province, Papua New Guinea	Certified	15-Feb-18
		Giligili Estate				
		Waigani Estate				
		Sagarai Estate				
		Padipadi Estate				
		Mariawatte Estate				
		East Gurney Estate				
		West Gurney Estate				
		East Sagarai Estate				
		West Sagarai Estate				
		3				
Kara Estate						
Nalik Estate						
West Coast Estate						
Noatsi Estate						
Madak Estate						

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		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 (Paddock) Estate				
		Surinam Estate				
		Dumpu Estate				
		Ngaru Estate				
		J Estate (Jephcott) Estate				
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	NA	Oro Bay Province, Papua New Guinea	Certified	1-Feb-13
		Mamba Oil Mill				
		Embi Estate				
		Ambogo Estate				
		Sangara Estate				
		Sumbiripa Estate				
		Mamba Estate				
		Mosa Oil Mill				
		Kumbango Oil Mill				
		Kapiura Mill				
		Numundo Mill				
		Waraston Mill				
		Bebere Estate				
		Kumbango Estate				
		Togulo Estate				
		Dami Estate				

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No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date
	SOU Name					
6	West New Britain (WNB)	Waisisi Estate	NA	Kimbe, West New Britain, Papua New Guinea	Certified	10-Sep-08
		Kautu Estate				
		Karausu Estate				
		Moroa Estate				
		Bilomi Estate				
		Loata Estate				
		Haella Estate				
		Garu Estate				
		Daliavu Estate				
		Sapuri Estate				
		Malilimi Estate				
		Rigula Estate				
		Nomundo Estate				
		Navarai / Karato ME /KDC EU Estate				
		Volupai / Lotomgam / Natupi / Goruru Estate				
		Lolokoru Estate				
		Ove Estate				
7	Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Munum Estate	Sep-20	Markham Farms,	RaCP	The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore, the Remediation and Compensation Procedure will be required to be fulfilled in order to achieve certification. The Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEJIA and LUCA are being undertaken in order to submit and

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		Erap Estate	Sep-20		RaCP	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.
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LIBERIA

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Remarks
	SOU Name					
1	Sime Darby Plantation (Liberia) Grand Cape Mount	Grand Cape Mount Mill	2019	Grand Cape Mount County	Not yet Certified	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. *Note: RSPO NPP Announcements can be found at http://www.rspo.org/certification/new-planting-procedures/publicconsultations/page/14? 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 & 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.
		Bomi Estate				
		Lofa Estate				
		Matambo Estate				
		Grand Cape Mount Estate				