



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

File Ref. : ES10171012

RSPO PUBLIC SUMMARY REPORT

CLIENT : SIME DARBY PLANTATION BERHAD – SOU 5 SELABA

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	
SELABA Strategic Operating Unit (SOU 5)	Selaba Oil Mill	3° 59' 20.3"N	101° 04' 52.6"E	36000 Teluk Intan, Perak
	Cluny Estate	3° 50' 32.7"N	101° 26' 13.8"E	35800 Slim River, Perak

MAP : See Attachment 1

AUDIT DATE : 28 to 31 December 2020

DURATION : 12 auditor days

TYPE OF AUDIT : ☐ Annual Surveillance Audit

☒ Recertification Audit

STANDARD : MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

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

VALIDITY OF RSPO CERTIFICATE: 03 March 2016 - 02 March 2021

(extended to 2/06/2021; provided under the provision in addressing the Covid-19 pandemic condition)

The following attachments form part of this report:

Non-conformity Report(s) ☒

List of additional site(s) ☐

Report by Audit Team Leader

Acknowledgement by Client's Representative

Name : Mohd Zulfakar Kamaruzaman

Name : Mohd Asid Mamat

Signature :

Signature :

Date : 24/04/2021

Date : 26/04/2021

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SUMMARY OF AUDIT

Stage 2 audit / Recertification audit				
On-site audit date :	28-31 December 2020		No. of auditor days :	12 auditor days
Audit team :	Mohd Zulfakar Kamaruzaman (LA), Rozaimee Ab Rahman, Rahayu Zulkifli			
No. of major NCR :	4	3.4.3, 3.8.7, 7.2.10, 6.2.3		Closing date : 30/3/2021
No. of minor NCR :	1	3.3.3		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	√		√	√
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
		√		
	Indigenous people	Contractors	Others (Please specify)	
	√	√		
Supply base sampled :	Selaba POM, Cluny Estate.			
Changes since the last audit :	The Certified and planted Ha had been reduced due to Transfer of 1 Supply Base (Bikam Estate) to SOU Seri Intan. Currently only 1 Supply base Remaining which is Cluny Estate			
Justification of audit planning :	Selaba POM – 6 mandays has been located to cover all RSPO P&C MYNI including 2 mandays for SCCS Cluny Estate – 6 mandays for each estate to cover all relevant RSPO indicator such as 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.			
Report approved by :	Kamini Sooriamoorthy		Approval date : 23/04/2021	

Annual Surveillance Audit 4				
On-site audit date :	3 rd to 6 th December 2019		No. of auditor days :	18
Audit team :	Selvasingam T. Kandiah (LA), Mohd Zulfakar Kamaruzaman , Mohd Norddin Abdul Jalil, Rozaimee Ab Rahman			
No. of major NCR :	1	Indicator: 7.8.2		Closing date : 3/3/2020
No. of minor NCR :	1	Indicator : 3.3.2		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	√	√		√
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	√			√
	Indigenous people	Contractors	Others (Please specify)	
	√	√		
Supply base sampled :	Selaba POM, Bikam Estate, Cluny Estate.			
Changes since the last audit :	The Certified and planted Ha had been reduced based on data from the latest GPS Hectare survey conducted in Jan 2020 by Precision Agriculture Unit (PAU, R&D). Certified Ha is now 3,557.35 as against the previous figure of 3,627.03 while Planted Ha is now 3,133.10 as against the previous figure of 3,449.72 Ha.			
Justification of audit planning :	Selaba POM – 4 mandays has been located to cover all RSPO P&C MYNI and 2 mandays for SCCS Bikam & Cluny Estate – 12 mandays for each estate to cover all relevant RSPO indicator such as 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.			
Report approved by :	Kamini Sooriamoorthy		Approval date : 13/03/2020	

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SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Dec 2020 - Nov 2021				Dec 2019 - Nov 2020
Certified FFB Processed (MT)	****2,075.85				68,847.19
Production of Certified CPO (MT)	****434.06				13,571.49
Production of Certified PK (MT)	****103.79				3,299.16
Certified Areas (Ha)	***1,549.75				**3,557.35
Planted Areas (Ha)	***1,282.00				**3,133.10
Production Areas (Ha)	1,085.28				2,204.61
HCV Areas / Conservation Areas (Ha)	*6.49				*6.49
REMARKS	<p>*Decreased in HCV areas in comparison with that reported in 2018 as this was the only area that belongs to Selaba CU under Cluny Estate.</p> <p>**The reduction in HA has been based on data from the latest GPS Hectare survey conducted in the Jan 2020 by Precision Agriculture Unit (PAU, R&D).</p> <p>***Further reduced as Bikam Estate was transferred out to Seri Intan CU.</p> <p>****Lower certified crop production (and lower certified CPO & PK) as this has been based on the projected production from the only ONE estate in Selaba CU, which is Cluny Estate.</p>				

TABLE 2

	CPO	PK
Last years certified volume (MT)	13,571.49	3,299.16
Last years actual certified sold (MT)	509.93	700.00
Last years actual sold under other schemes (MT)	-	-
Last years sold conventional (MT)	13,004.85	2,525.61
New year certified volume (MT)	434.06	103.79

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1.0

AUDIT PROCESS

1.1 Certification Body

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

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Zulfakar bin Kamaruzaman	Lead Auditor / Supply Chain, Social, HCV	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C and RSPO Supply Chain.
Rozaimie bin Ab Rahman	Auditor / GAP, Safety and Environment, GHG	Holds a B. Sc. of Agriculture. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO.
Rahayu binti Zulkifli	Auditor / Social	Graduated with LLB (Hons), a practising lawyer, Head of Legal Dept. for several companies before working with an environmental NGO in 2003 and joined the RSPO in 2014. A freelance expert in social aspect of the RSPO since 2016 and a qualified auditor for RSPO P&C.

1.3 Audit methodology

The scope of the audit was based on a sampling of the supply bases. However, according to the new RSPO Certification system 2017 if the certification unit has 4 or below supply bases, all estates should be audited. For this CU, Selaba palm oil mill is with one supply base only; the Cluny Estate. The audit has included visit to the estate, mill and external stakeholder houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors, and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

SIRIM QAS International had initiated the stakeholder consultation by announcing the invitation in the RSPO and SIRIM QAS International's websites in 26/11/2020. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs). Stakeholder consultation was also carried out during the on-site audit. In general, there was no negative comments made against this Certification Unit. In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below:

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<p>Workers:</p> <ul style="list-style-type: none"> a. Workers work 6 days a week with one rest day (Sunday). They work 8 hours with a minimum of 30 minutes' break in between. b. All workers sampled confirmed that they received the minimum wage. They receive their salaries before 7th of every month. As of the date of this audit, all sampled workers understood on Minimum Wages. c. Any overtime work is mutually agreed between workers and management, and that there is no element of forcing. d. Foreign workers are not subjected to any recruitment fee. Foreign workers who choose to keep their passports at the office have done so with their written consent. e. Workers are generally satisfied with the way complaints lodged are acted upon. Delays in house repairs, if any, are usually due to the need to order repair parts. f. Workers, including foreign workers get to appoint their own representatives. There is no interference of influence exerted by the employer. g. For newly arrived foreign workers who do not understand Bahasa or English, translations are provided during briefings.
2) Settlers	Not applicable.
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> a. Jawatankuasa Pengurusan Komuniti Kampung (JPKK) from Kg. Pekan Trolak, Kg Rasau. b. No land claims/disputes and no social issues. Harmonious co-existence.
4) Suppliers	Fair dealings with the SOU. Payments are made within 1 month of Invoice.
5) Contract workers	At time of visit there were no contract workers.
6) Local & national NGOs	Not available for this audit.
7) Government agencies / Statutory bodies	Not available for this audit.
8) Independent growers / Smallholders	a. No complaints.

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	b. Fair & timely payments for FFB supplied.
9) Indigenous people	Tok Batin from Kg Kuala Bill. No land issues.
10) Contractor	Perniagaan Sinaran Mewah, Liang Pang & Sons Trading Sdn Bhd, Ladang Moccis Sdn Bhd, Sawit Berkat Sdn Bhd, Setia Station Enterprise Sdn Bhd, Sawit Teluk Baru, Gan Kim Teik & Son Sdn Bhd and Law & Yap Sawit Trading Sdn Bhd Mayang Bayumas Sdn Bhd. No issue raised. Payments are received in time.
11) Previous land owner (if any)	No issues
12) Others (please specify)	No issues

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

Selaba POM has a processing capacity of 40 metric tons of FFB per hour. During this Audit, Bikam Estate has been transferred to SOU Seri Intan. Only Cluny Estate maintains as supply base under SOU Selaba and Selaba POM depending on diverted crops from neighboring CU and outside crops. Cluny Estate has been fully developed before the year of 2005. Hence, there is no New Plantings in Cluny Estate. Selaba CU is also certified with MSPO certification.

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

The FFB sourced from company owned estates that are certified and third parties which are not certified. Details of the FFB contribution from each source to the Selaba Palm Oil Mill are shown in the following tables:

Table 1: Actual FFB production by the supply base for the reporting period (Dec 2019 to Nov 2020)

Estates	FFB Production	
	Tonnes	Percentage (%)
Seri Intan Estate	15,101.80	9.44
Sabrang Estate	11,606.69	7.26
Sg Wangi Estate	2,857.24	1.79
Cluny Estate	10,175.17	6.36
Bikam Estate	6,999.57	4.38
Bagan Datoh Estate	4,502.00	2.82
Flemington Estate	4,244.64	2.65
Sg Samak Estate	3,841.39	2.40
Sogomana Estate	2,365.82	1.48
Sabak Bernam Estate	6,955.15	4.35
TOTAL	68,847.19	43.05
Third parties		
VR Plantation	186.07	0.11
Tan Hing	2,457.48	1.54
Chuan Soon	3,315.44	2.07
Sinaran Mewah	10,606.63	6.63
Setia Station	6,089.00	3.81
Sawit Teluk Baru	18,700.07	11.69
Sawit Berkat	5,618.53	3.51
Menara Emas	2,332.83	1.46
Macro Sawit	1,042.49	0.65
Liang Pang	5,553.48	3.47
Law & Yap	4,083.65	2.55
Ladang Moccis	29,144.61	18.23
KWS Changkat	134.49	0.08
KWS Seri Gala	188.86	0.12
Kuala Perak	201.83	0.13
Hiap Thye	257.66	0.16
Green Agro	487.33	0.30
Ban Boon Teng	373.69	0.23
Bagan Pasir	81.41	0.05
TOTAL	91,062.05	56.95
TOTAL	159,909.24	100

Table 2: Projected FFB production by supply base for the reporting period (Dec 2020 to Nov 2021)

CU own estates	FFB Contribution	
	Tonnes	Percentage (%)
Cluny Estate	2,075.85	1.13
Other Supply Bases		
Projected diversion from Seri Intan Estate (certified)	8,107.05	4.40
Projected diversion from Sabrang Estate (certified)	12,744.76	6.91
Projected diversion from Sg Wangi Estate (certified)	6,044.91	3.28
Projected diversion from Bikam Estate (certified)	643.73	0.35

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Projected diversion from Bagan Datoh Estate (certified)	14,055.02	7.62
Projected diversion from Flemington Estate (certified)	9,795.70	5.31
Projected diversion from Sg Samak Estate (certified)	8,282.99	4.49
Projected diversion from Sogomana Estate (certified)	7,281.87	3.95
Projected diversion from Sabak Bernam Estate (certified)	7,339.49	9.98
Third parties (non-certified)	108,000.00	58.58
Grand Total	184,371.37	100

**Table 3: Actual FFB received and CPO & PK dispatch by POM for the last reporting period
(Dec 2019 to Nov 2020)**

RSPO Supply Chain Model : MB	Total (MT)
FFB Received	159,909.24
FFB Processed	159,909.24
Certified FFB Processed	68,847.19
Non-certified FFB Processed	91,062.05
Crude Palm Oil (CPO)	
Overall CPO Production	31,524.95
Certified CPO Production	13,514.78
Certified CPO delivered as RSPO certified	509.93
Certified CPO delivered as Conventional	13,004.85
Certified CPO delivered under other sustainable schemes	-
Credits traded through Books and Claim	-
Palm Kernel (PK)	
Overall PK Production	7,663.56
Certified PK Production	3,225.61
Certified PK delivered as RSPO certified	700.00
Certified PK delivered as Conventional	2,525.61
Certified PK delivered under other sustainable schemes	-
Credits traded through Books and Claim	-

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

RSPO Supply Chain Model : MB	Total (MT)
FFB Received	184,371.37
FFB Processed	184,371.37
Certified FFB Processed (from own CU)	2,075.85
Certified FFB Processed (from other certified CU)	74,295.52
Non-certified FFB Processed	108,000.00
Crude Palm Oil (CPO)	
Overall CPO Production	38,552.05
Certified CPO Production	434.06
Palm Kernel (PK)	
Overall PK Production	9,218.57
Certified PK Production	103.79

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Table 5 Planted and certified area of the SOU Selaba

Estate	Planted (ha)	Certified (ha)
Cluny Estate	1,282.00	1,549.75
Total	1,282.00	1,549.75

Table 6 Planting profile

<u>Estate</u>	<u>Year of planting</u>	<u>Planting Cycle</u>	<u>Mature (Ha)</u>	<u>Immature (Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Cluny	98	2	86.56		86.56	6.75	
	99	2	61.57		61.57	4.80	
	00	2	320.79		320.79	25.02	
	01	2	42.55		42.55	3.32	
	05	2	33.18		33.18	2.58	
	08	2	67.08		67.08	5.23	
	2012	3	66.93		66.93	5.22	
	2013	3	78.46		78.46	6.12	
	2015	3	98.92		98.92	7.72	
	2016	3	111.36		111.36	8.69	
	2017	3	118.08		118.08	9.21	
	2019	3		196.72	196.72		15.34
Total			1,085.28	196.72	1282.00	84.66	15.34

2.3 Organizational Information/Contact Person

The details of the contact person is as shown below:

Name	:	Mohd Asid bin Mamat
Position	:	Mill Manager
Address	:	KKS Selaba, Lot 7376, KM7, Jalan Changkat Jong, 36000 Teluk Intan, Perak.
Phone no.	:	019-380 7417
Fax no.	:	-
Email	:	kks.selaba@sime-darbyplantation.com

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3.0 AUDIT FINDINGS

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

Yes, Bikam Estate was transferred to SOU Seri Intan and resulted in reduced of planted and certified hectarage for Selaba CU.

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

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

If no, comments on the organization's compliance with the RSPO partial certification rules:
Details issues related to these were covered in the section - RSPO Certifications Systems for Principles & Criteria June 2017, in this report.

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

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

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

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

If no, please state reasons NA

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

N/A

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

No

3.4 Status of previous non-conformities * ☒ Closed ☐ Not closed*

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

3.5 Complaint received from stakeholder (if any)

No significant complaints from stakeholders were observed.

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4.0 DETAILS OF NON-CONFORMITY REPORT

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

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

List : 1	RZ 03 2020 (3.3.3)
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Total no. of major NCR(s)
(details refer to Attachment 4)

List : 4	RZ 01 2020 (6.2.3), RZ 02 2020 (3.4.3), RAR 01 2020 (7.2.10), MZK 01 2020 (3.8.7)
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4.2 For SC (Details checklist refer to Attachment 3) :

Total no. of minor NCR(s)
(details refer to Attachment 5)

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

List :-	NA
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5.0 AUDIT CONCLUSION

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

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6.0 RECOMMENDATION

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

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

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

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

☒ Recommended to continue certification.

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

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

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

Audit Team Leader : MOHD ZULFAKAR BIN KAMARUZAMAN
(Name)


(Signature)

30/3/2021
(Date)

Map of SOU 5 Selaba



RECERTIFICATION AUDIT PLAN

1. Objectives

The objectives of the audit are as follows:

- To evaluate **SOU Selaba** continued conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI) and RSPO Supply Chain Requirements
- To verify the effective implementation of corrective actions arising from the findings of last assessment.
- To make appropriate recommendations based on the assessment findings.

2. **Date of assessment** : 28-31 December 2020

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

- Selaba Palm Oil Mill
- Cluny 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:2019
- b. RSPO Certification Systems, 2017
- c. RSPO Supply Chain Standard, 14 June 2017
- d. Company's audit criteria including Company's Manual/Procedures

6. Assessment Team

Assessor: Mohd Zulfakar Kamaruzaman (Social, Land Title, GAP)

Rahayu Zulkifli (Social, HCV)

Rozaimie Ab Rahman (Environment, Safety, Supply Chain)

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

7. Audit Method

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

8. Audit Findings

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

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

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Date / Time	Coverage of assessment / Activity / Site	Zulfakar	Rahayu	Rozaimée
Day 1: 28 December 2020 (Monday)				
9.00am – 9.30am	Opening Meeting – Venue: Selaba POM <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. 	/	/	/
9.30am – 1.00pm	Site observation to Selaba POM RSPO Supply Chain 2017 <ul style="list-style-type: none"> RSPO Supply chain standard implementation including model requirements P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management 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, etc. Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management 	/	/	/
1.00pm – 2.00pm	Lunch Break	/	/	/
2.00pm – 5.00pm	Continue assessment at respective sites	/	/	/
Date / Time	Coverage of assessment / Activity / Site	Zulfakar	Rahayu	Rozaimée
Day 2: 29 December 2020 (Tuesday)				
9.00am – 1.00pm	Site observation to Selaba POM P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management 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, etc. Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management 	/	/	/
1.00pm – 2.00pm	Lunch Break	/	/	/
2.00pm – 5.00pm	Continue assessment at respective sites	/	/	/

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Date / Time	Coverage of assessment / Activity / Site	Zulfakar	Rahayu	Rozaimée
Day 3: 30 December 2020 (Wednesday)				
9.00am – 1.00pm	Site observation to Cluny Estate <ul style="list-style-type: none"> • P1, P2, P3, P4, P5, P6, P7 • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, • New planting • Interview with workers, contractors etc. • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management 	/	/	/
1.00pm – 2.00pm	Lunch Break	/	/	/
2.00pm – 5.00pm	Continue assessment at respective sites	/	/	/
Date / Time	Coverage of assessment / Activity / Site	Zulfakar	Rahayu	Rozaimée
Day 4: 31 December 2020 (Thursday)				
8.30am – 12.30pm	Site observation to Cluny Estate <ul style="list-style-type: none"> • P1, P2, P3, P4, P5, P6, P7 • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, • New planting • Interview with workers, contractors etc. • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Confirmation of time bound plan & review of partial certification 	/	/	/
12.30pm – 1.30pm	Lunch Break	/	/	/
1.30pm – 3.30pm	Continue assessment at respective sites	/	/	/
3.30pm – 4.00pm	<ul style="list-style-type: none"> • Verification on outstanding issues • Audit team discussion, preparation on audit findings and issuance of nonconformity report (if any) 	/	/	/
4.00pm -5.00pm	<ul style="list-style-type: none"> • Closing meeting – venue at Cluny Estate/Selaba POM (whichever convenience) • Presentation of audit findings, positive comment, • Question & answer 	/	/	/

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Attachment 3

MALAYSIA NATIONAL INTERPRETATION 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	Selaba POM and Cluny Estate make available documents specified in the RSPO P&C to the public. These documents are either available via the Company's website www.simedarbyplantation.com , or available at the office, or can be accessible at each operating unit.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	The information is provided in Bahasa Malaysia, and some with English translation. This was evidenced from sighting of the documents. The information is usually provided during stakeholder consultation meetings.
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	The CU had identified personnel responsible for handling of complaints. Records of communication were identified and maintained in different files, internal & external communication, depending on the stakeholder. Among the records inspected were correspondences with the authorities, local communities and employees.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	Sime Darby Plantations Berhad has developed an SOP known as Consultation and Communications procedures documented in the Standard Operating Manual (Version 1 Year 2008) dated 1 April 2008 entitled "Procedure for External Communications".
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	Reviewed during the audit were stakeholder lists for Selaba POM (updated on 30 Nov 2020) and Cluny Estate (updated on 1 August 2020).
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	Units within the SOU 5 Selaba subscribes to the Sime Darby Plantations Group's Code of Business Conduct (COBC) dated March 2018. This Code applies to all its employees, counterparts, business partners, affiliates and associates.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	The system to monitor compliance with of the COBC is in-place.

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Principle 2: Operate legally and respect rights

Implement legal requirements as the basic principles of operation in any jurisdiction.

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	YES	SOU Selaba has continued to comply with all applicable local, national and ratified international laws and regulations. The last update of legal register was in July 2019.
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	YES	SOU Selaba have identified, documented and maintained their legal register with written information on legal requirements which related to their operation. The acts and its regulations were evaluated for compliance annually. Latest evaluation on their legal register titled 'Legal and Other Requirements Register (LORR)' was on 29/09/2020 Selaba CU.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	YES	In general, the mill and estate boundaries were generally demarcated. Boundary lines were indicated on the maps. The locations of boundary stones were also indicated in the estate maps. This was also verified during the site review.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	YES	The list of stakeholders for SOU 5 Selaba are maintained and made available during the audit. The stakeholders list at Selaba POM and Cluny Estate are include the contractors, vendors, neighbouring estates/smallholders, villagers and government agencies with latest review on 2/1/20 and 1/8/20.
	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements as verified through Online Vendor Registration (OVR) and the Vendor Code of Business Conduct (VCOBC) which apply to all contractors for due diligence and meeting legal requirements.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	YES	All sampled contracts contain a provision which refers to compliance with Sime Darby's Policies which include its Human Rights Charter Revised 2020 (HRC 2020).
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> Information on geo-location of FFB origins. Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder 	YES	<p>Selaba POM is currently have the report for the following for the directly source of FFB:</p> <ul style="list-style-type: none"> a) Information on geo-location of FFB origins. b) Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder c) MPOB License <p>The evidence of currently document in is available in the RESPONSIBLE SOURCING GUIDELINE (RSG) BASELINE ASSESSMENT REPORT and Desktop Assessment for New OCP Suppliers and Land Title for all the directly source FFB also verified by the auditor.</p>

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Clause	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> One or more supporting documents for claims Valid MPOB license 		
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	YES	Selaba POM is currently have the report for the following for the indirectly source of FFB: <ul style="list-style-type: none"> d) Information on geo-location of FFB origins (radius 50 km). e) Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder f) MPOB License for traders and OCP supplier

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	YES	The Selaba SOU continued to make commitment to long-term economic and financial viability. The annual budgets for 2020 to 2023 which included Capital and Operating Expenditures in addition to FFB yield/Ha, OER and CPO were sighted. Also cover activities for machinery and plant upkeep, expenditure for mature and immature oil palm upkeep, harvesting and evacuation, welfare, capital expenditure and RSPO compliance.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	The long-range replanting programme (LRRP) until 2025 were sighted for both Estates. This programme is reviewed once a year and is incorporated in the SOU annual financial budget.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	The management review meeting for SOU Selaba which were held by individual site.
3.2 The unit of cert regularly monitors and reviews their economic, social and env performance & develops & implements action plans that allow continuous improvement in key operations.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	The continuous action plan for Selaba POM and Cluny Estate are based on the issues identified in the Social Action Plans which are updated annually. The continuous improvement plans include annual maintenance of monsoon drains, ongoing monitoring of road conditions at workers' housing, etc.
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	N/A	NOT APPLICABLE

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Clause	Indicators	Comply Yes/No	Findings
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	SOU Selaba continued to use the documents established by the Sime Darby Plantation Bhd among others as follows; a) Plantations / Mill Quality Management System (PQMS / MQMS). Manual b) PQMS / MQMS Standard Operating Manual and Procedures (SOP) c) Sustainable Plantation Management System (SPMS) Manual d) RSPO Supply Chain Manual e) ESH Management System Manual f) Occupational Safety and Health Manual g) Pictorial Safety Standards h) Laboratory Process Control Manual i) Security Guidelines. j) SOP for recruitment, selection and hiring of foreign workers k) SOP for hiring and selection of local workers l) SOP for promotion of workers m) SOP of Suara Kami Helpline 2020.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	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.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	NO	Records of monitoring and the actions taken by the estate continued to be maintained and kept for a minimum of 12 months. Monthly Progress, Monthly Costing and Annual Reports on monitoring of all activities were made available during the audit as well as official monthly reporting to MPOB. However, it was found during the recertification audit that: 1. No record of monitoring and action taken against sundry shop at Cluny Estate for not complying with the warning letters issued by Manager dated 11 October 2020 and 10 November 2020 for having breached the following laws: a. Selling LPG without license under Section 16 Control of Supplies Act 1961. b. Operating business without license as required under Section 5(1) Registration of Businesses Act 1956. c. Selling hard liquor within Cluny Estate premises. 2. No record of monitoring and action taken to ensure medical practitioner (VMO) visits Cluny Estate and Trolak Division clinics as per the SOP for Primary Health Care Services in Plantation Doc No. SD/SDP/PSQM (ESH)/202-OH14 dated 1 March 2017. The SOP requires the VMO to visit the estate clinics once a fortnight. Therefore, a Minor Non-Compliance NCR No. RZ03 of 2020 was raised.
3.4 A comprehensive Social and Environmental	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected	YES	A Social Impact Assessment (SIA) and records of meetings were maintained by the CU. The assessment was conducted on 24 Feb – 4 Mar 2014 and addendum has been in placed dated 4 April 2019 by the Social and Environment Projects Unit, PSQM Department. The assessment has covered Selaba POM, Cluny Estate and Bikam Estate.

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Clause	Indicators	Comply Yes/No	Findings
Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.		All data has been gathered with the participation of external and internal stakeholders. The assessment has reported sampling and data collection procedure, demographic information, issues, complaints, suggestion from workers, interview with stakeholders (workers, union, contractors, suppliers, local community, local government and private bodies) and summary analysis. Records of meeting were documented and made available.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	YES	A Social Impact Assessment (SIA) is available. This SIA was conducted on 24 Feb – 4 Mar 2014 by the Social and Environment Projects Unit, PSQM Department covering Selaba POM, Cluny Estate and Bikam Estate. All data has been gathered with the participation of external and internal stakeholders. The assessment has reported sampling and data collection procedure, demographic information, issues, complaints, suggestion from workers, interview with stakeholders (workers, union, contractors, suppliers, local community, local government and private bodies) and summary analysis. Records of meeting were documented, maintained by the CU and made available. Updates to the social action plan is being carried out annually after getting inputs from the meetings of the Gender Committee, NUPW and external stakeholders.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	NO	<p>Environmental management and monitoring plan were implemented at CU basis i.e established the ERP team to control the fire prevention. CU also conduct the stakeholder consultation on 23/11/2020 through invitation letter to comment for improvement of CU. As per to date no negative comment has been issued by stakeholder. All feedback form received stated positive comment for CU.</p> <p>Based on documents reviewed, field observations, interview with affected workers, and management team, it was found during this audit that Selaba POM and Cluny Estate could not demonstrate that the social action plans were implemented, reviewed and updated with participation of affected stakeholders. As a result, the following social-related issues was not been identified and assessed:</p> <p>Selaba POM:</p> <ul style="list-style-type: none"> • Assessment on the impact of reduced overtime hours on workers' income; • Assessment of impacts on workers' amenities (namely, car garage at the housing area) following the budget curtailment; and • Assessment of workers' concern and sentiment towards the challenges posed at the workers' housing by a resident's son. <p>Cluny Estate:</p> <ul style="list-style-type: none"> • Assessment of workers' right to adequate food and food security following the decision to clear vegetables planted behind Block B before providing a readily available alternative site for planting vegetables. <p>Therefore, a Major Non-Compliance NCR No. RZ02 of 2020 was raised.</p>

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Clause	Indicators	Comply Yes/No	Findings
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives.	YES	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and available.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	There is evidence that the employment procedures for local and foreign workers enumerated under Indicator 3.5.1 are being implemented, and employment records are maintained.
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	YES	All routine activities for mill and estate were adequately risked assessed. It covered including chemical usage, boiler operation, FFB sterilization, kernel extraction and oil extraction and clarification in the mill. Appropriate risk control measures had been determined and implemented for the respective activities and operation in the mill. Mitigation plan is properly documented and implemented.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	<u>Selaba POM</u> The effectiveness of implementation health & safety plan has been monitored by daily basis. All the precaution i.e. safety signboard, pictorial safety standards, PPE, etc has been published and display at workplace areas (notice board, muster call, etc). CU also monitored safety risk in workplace operation by monthly basis. Sighted evidence of workplace inspection has been carried out on before each OSH meetings at reception area, fruit handling, sterilizer, thresher, clarification, pressing, depericarper, boiler, power generation, water treatment plan, effluent treatment plan, kernel recovery, etc.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	YES	Formal training programmes for 2020 that covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs were presented to auditors by both estates and mill. The training programmes were also extended to contractors and suppliers. Trainings were either conducted internally by its own staff or by other department within the Sime Darby Group or consultant.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	Records of training is properly maintained.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	YES	Appropriate training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been conducted in Nov 2020 attended by PIC, Clerk, Assistant Engineer, Staff, Weighbridge Operator and Attendance list & photograph was seen and 5/11/20 for transporter contractor.

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SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/ estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	YES	Not applicable since Selaba Mill is MB
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 rd party certified supply base.	YES	SPOM 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 - CPO Mills: Mass Balance. SPOM obtained certified FFB from both certified and non- certified supply base. SPOM also found to be aware of the downgrading procedure. Details as in Table 3 of this report.
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	YES	This has been made available, as in Table 4 of this report.
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	YES	The mill was observed to have met with registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information were: Name: Selaba Oil Mill – Sime Darby Country: Malaysia Member Category: Oil Mil

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
			Products: CPO & Palm Kernel Program: MB
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard. • The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 	YES	Selaba POM had revised their documented procedure title 'Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001', version 2, Issue 5 dated April 2019.
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> • Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. • Effectively implements and maintains the standard requirements within its organisation. • Any non-conformities found as part of the 	YES	As describe under para 18.0 SOP for sustainable Supply Chain and Traceability issue no 5 dated April 2019, MPOM refer to Internal Audit Procedure (SD/SDP/PSQM/IAP) dated 1/11/17 which is following the RSPO Supply Chain Certification Standard Revision 2017 requirements. Internal Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2017 requirements.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.		
3.8.7	The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. The site shall inform the CB immediately if there is a projected overproduction of certified tonnage. The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	NO	SPOM had continued to receive certified FFB from own Estate Which is Cluny Estate diversion certified crop from another SOU. And Uncertified FFB from Surrounding Smallgrower and Small holder which is 22 suppliers. However, it was found that, SOU Selaba already overproduction their certified FFB, CPO and PK due to diversion from their certified SOU e.g Seri Intan Estate, Sabrang Estate, Sg Wangi Estate, Bikam Estate, Bagan Datoh Estate, Flemington Estate, Sg Samak Estate, Sogomana Estate, Sabak Bernam Estate and SOU Selaba has yet to inform the CB regarding this overproduction. Thus, Major NCR MZK 01 2020 has been raised against this indicator. SOU Selaba has a mechanism in place for handling non-conforming oil palm products and/or documents as describe under para 11.0 (non-confirming products and/or Documents) SOP for Sustainable Supply Chain and Traceability issue no 5 dated April 2019.
3.8.8	Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The info shall be complete and can be presented either on a single- documents or across a range of documents issued for RSPO certified oil palm products: a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number	YES	Documented procedures related to sales and goods out were sighted and found adequate. Based on verification during the audit, SPOM has yet to deliver certified materials to end buyer. Therefore, following are sample of non- certified CPO & PK sales which comply to standard requirement except for the notation of Supply Chain model applied & Supply Chain certificate number. For future certified transaction, SPOM will be indicating the 2 items in weighbridge dispatch ticket.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	YES	There are 1 outsource company CPO transporter. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training in nov 2020 for transporter contractor was sighted by the auditor.
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	YES	List of contact person for both transporters were made available and up-to-date in the stakeholder list. And was updated on 7/9/20.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	YES	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	YES	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up-to-date.
	ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	YES	Relevant record was maintained for more than 2 years as per Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001', version 2, Issue 5 dated April 2019
	iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	YES	Selaba POM has maintained the Real Time basis accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record titled as <i>"RSPO Records for Oil Mills"</i> .
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)	YES	From Nov 2019 to Dec 2020, Selaba POM had delivered 509.93MT of CPO MB to 1 buyer (Sime Nuri) From same date 100 MT of PK MB to 1 buyer (Sime Nuri). The records of of the volume purchased (input) and claimed (output) over a period of 12 months was updated in 'RSPO Records for Oil Mill'.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.13	Extraction rate The oil extraction rate(OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	YES	Selaba POM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER).
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	YES	Extraction rates has been updated monthly as per stated in Monthly Production Report (Physical Movement)
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	YES	Not Applicable since this mill is MB Mill
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform	YES	Documented procedures related to sales and goods out were sighted and found adequate. The requirement of sales & goods out especially on notation of applicable Supply Chain model & Certificate number being complied by indicating in weighbridge dispatch ticket.
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	YES	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Selaba POM has not use RSPO corporate logo as well as trademark logo.

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Principle 4: Respect community and human rights and deliver benefits

Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	YES	The Policy to respect human rights exists in Sime Darby Plantation's Human Rights Charter Revised 2020 (HRC 2020). The scope of this HRC 2020 encompasses workers (men, women, migrant, trans-migrant, contract and casual), employees (all levels of the organisation) and parties and communities surrounding SDP operations. The commitments under the HRC 2020 include engaging and empowering local communities, respect and uphold labour rights, respect and uphold children's rights, protection of human rights defenders, whistle blowers, complainants, and community spokespersons. Among others, the HRC 2020 states the Company's commitment to safeguarding the confidentiality of those involved.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	Based on documentation reviewed, interviews conducted, and observations made, there is no evidence of any instigation of violence or use of any form of harassment within the certification unit.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	YES	The system used by SOU 5a Selaba in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Procedures for handling Social Issues" dated 1 Nov 2008. Selaba POM and Cluny Estate each has its own Internal Complaint Book and External Communication Book. The Internal Complaint Book was used for employees to lodge complaint pertaining to their houses, and there is evidence that the complaints were resolved in a timely and appropriate manner. The external book was reviewed and found no complaints against the CU.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	To ensure that illiterate parties also understand the procedures, verbal, practical demonstration and pictorial briefings are given are translated into the language the affected parties understand. This was confirmed by foreign workers interviewed at Cluny Estate and Selaba POM.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	YES	There is evidence that parties to a grievance are kept informed of the progress of the complaints. This was done via progress meetings as evidenced via meeting with NUPW and management dated in October 2020.

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Clause	Indicators	Comply Yes/No	Findings
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	YES	Paragraph 7 of Appendix 5 Sustainable Plantation Management System, Flowchart and Procedure On Handling Social Issues Version 1, Year 2008, Issue No 1, Date 1 Nov 2008 states upon failure of negotiation process involving estate management, representatives from the disputed parties, zone heads, third parties and stakeholders, legal proceedings may follow.
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	YES	The main contribution to community development for both Selaba POM and Cluny Estate is the employment opportunities accorded to the surrounding communities, including the indigenous peoples, the Orang Asli. At Cluny Estate, out of the 35 Malaysian employees, 14 are from the Orang Asli community. Another community contribution was the collaboration with Dept of Environment, Dept of Fisheries and Fishermen's Association in October 2020 where in conjunction with the World River Day celebration, 15,000 silver barbed fish were released in the river and 5,000 released at the HCV pond in Chersonese. The purpose was to populate the local river with local native species and to increase the economy of local fisheries.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a FPIC process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	YES	Evidence of legal ownership of the land including history of land tenure was verified during this audit. The land was previously owned 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.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Selaba since 1985. The audit team had confirmed that there were no land issues related to previous owners.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Selaba since 1985. 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
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Selaba since 1985 The audit team had confirmed that there were no land issues related to previous owners.
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Selaba since 1985 The audit team had confirmed that there were no land issues related to previous owners.
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	YES	As reported in 4.4.1 of this checklists, it has been verified that the land is now legitimately owned by Lam Soon CU since 1986. All the related documentation regarding the land acquisition was kept in Lam Soon HQ Office, Glenmarie, Shah Alam and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	There was no land encumbered by customary rights or dispute from any stakeholder at SOU Selaba.
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	YES	There was no land encumbered by customary rights or dispute from any stakeholder at SOU Selaba.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	There was no land encumbered by customary rights or dispute from any stakeholder at SOU Selaba.
4.5 No new plantings are established on local	4.5.1 (C) Docs showing id and assessment of demonstrable legal, customary and user rights are available.	YES	Based on Social Impact Assessment (SIA) Report for SOU 5 Selaba and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by SOU Selaba.

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Clause	Indicators	Comply Yes/No	Findings
peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a doc, long-term and two-way process of consultation and negotiation.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Selaba. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Selaba. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Selaba. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to info and advice that is independent of the project proponent, concerning the legal, economic, environmental and social	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Selaba. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.

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Clause	Indicators	Comply Yes/No	Findings
	implications of the proposed operations on their lands.		
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Selaba. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Selaba. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System document issued on 1/11/2008 (Version 1) entitled "Procedures for Handling Boundaries Disputes". In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	In accordance with the 'Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan', the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at mill and visited estates.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	YES	There were no scheme small holdings at Selaba SOU.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are doc, with evidence of the participation of affected parties, and made publicly available to them.	YES	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.

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Clause	Indicators	Comply Yes/No	Findings
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System document issued on 1/11/2008 (Version 1) entitled "Procedures for Handling Boundaries Disputes". In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation is in place and documented and made available to affected parties.	YES	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighbouring estate.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	It has been verified that the land is legitimately owned by SOU Selaba and all the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	YES	It has been verified that the land is legitimately owned by SOU Selaba and all the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	YES	There was no land encumbered by customary rights or dispute from any stakeholder at SOU Selaba.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there	YES	There was no land encumbered by customary rights or dispute from any stakeholder at SOU Selaba, it was confirmed through interviews with head of village/Chairman of Jawatankuasa Pengurusan Komuniti Kampung (JPKK) from Kg. Pekan Trolak, Kg Rasau and Tok Batin from Kg Kuala Bill.

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Clause	Indicators	Comply Yes/No	Findings
	remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements.		
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities where applicable).	YES	There was no land encumbered by customary rights or dispute from any stakeholder at SOU Selaba, it was confirmed through interviews with head of village/Chairman of Jawatankuasa Pengurusan Komuniti Kampung (JPKK) from Kg. Pekan Trolak, Kg Rasau and Tok Batin from Kg Kuala Bill.

Principle 5: Support smallholder inclusion

Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Yes	Current and past prices paid for FFB were displayed at the weighbridge counter. Small holder agrees with price because the price is followed by the guidelines by MPOB. The Guideline for Price is printed from MPOB web site.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Yes	Sighted evidence training regarding price mechanism to the Outside Crop Producer (OCP) in Nov 2020.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	Fair pricing, including premium pricing is agreed with smallholders. Small holders agree with price because the price is followed by the MPOB Pricing Mechanism. The Guideline for Price is printed from MPOB web site.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	Yes	Fair pricing, including premium pricing is agreed with smallholders. Small holders agrees with price because the price is followed by the MPOB Pricing Mechanism. The Guideline for Price is printed from MPOB web site.
	5.1.5 Contracts are fair, legal and	YES	The contractors confirmed the fairness of the terms of their agreement, and payments are usually received within 7 to 10 days of invoice issuance. Fresh Fruit Bunches are supplied

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Clause	Indicators	Comply Yes/No	Findings
	transparent and have an agreed timeframe.		from SDPB owned estates which are certified to RSPO and outsider Crop.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	The contractors confirmed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	In Selaba POM has been calibrated in 6 yearly basis using Metrology Corporation Malaysia Sdn Bhd sighted last calibration has been done in Dec 2020.
	5.1.8 The unit of certification supports Independent Smallholders with cert, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	YES	Sime Darby Plantation supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Even Sime Darby SOU Selaba has encourage the smallholder to certify with RSPO, but smallholder don't want to join due to Financial constraint.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	YES	A grievance mechanism which respects anonymity and protects complainants is in place at the SOU Selaba as per the SOM Procedure for External Communication dated 1/8/2008, and as per SOP Carta Aliran Pengendalian Isu Sosial.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	Yes	Sime Darby Plantation supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Even Sime Darby SOU Selaba has encourage the smallholder to certify with RSPO, but smallholder don't want to join due to Financial constraint.
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification.	Yes	Sime Darby Plantation supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Even Sime Darby SOU Selaba has encourage the smallholder to certify with RSPO, but smallholder don't want to join due to Financial constraint.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	Sime Darby Plantation supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Even Sime Darby SOU Selaba has encourage the smallholder to certify with RSPO, but smallholder don't want to join due to

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Clause	Indicators	Comply Yes/No	Findings
			Financial constraint.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Yes	Sighted records of Evidence unit of certification trains Scheme Smallholders on pesticide handling however, smallholder don't want to join RSPO due to Financial constraint
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Yes	Currently SOU Selaba has regularly review and reports the progress if any of smallholder want to join the RSPO.

Principle 6: Respect workers' rights and conditions

Protect workers' rights and ensure safe and decent working conditions.

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	YES	A Policy on equal opportunities and non-discrimination exists in SDP's Human Rights Charter 2020. Paragraph 3.2.5 of the HRC 2020 states that the Company would promote diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. It also states that the Company will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. Interviews conducted with workers confirmed the implementation of this Policy.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Based on documentation reviewed such as employment contracts and letters of offer, pay slips, allocation of housing at the linesite and audit interviews, there is no evidence that local and foreign workers, women and local communities have been discriminated against.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	YES	Selaba POM and Cluny Estate were able to demonstrate that recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness appropriate for the job. Interview of candidates will be done by Manager and the Assistant Managers where an evaluation form is filled up to determine the suitability of the candidate. These documents are contained in the workers' personal files.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated.	YES	As of the date of this audit, and as confirmed by the Gender Committee chairpersons of both Cluny Estate and Selaba POM, as well as Medical Assistant at Cluny Estate and Health Assistant at Selaba Estate clinic, pregnancy testing is not conducted as a discriminatory measure and only carried out on a monthly basis on female workers whose

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Clause	Indicators	Comply Yes/No	Findings
	Alternative equivalent employment is offered for pregnant women.		job is in direct contact with chemicals and those carrying out work as sprayers and manurers. When confirmed pregnant, the said female worker would be assigned an alternative equivalent job.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	A gender committee is in place throughout all the production units within SOU 5a Selaba. The gender committee comprise female employees of all levels, including wives of male employees. Among the activities carried out by the Gender Committee include training on sexual harassment, reproductive rights and opportunities to improve members' income.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	Based on letters of job offer and monthly pay slips reviewed, evidence is available that workers receive equal pay for the same work scope.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	YES	Applicable labour laws, and documentation of pay and conditions are contained in in employment contracts (for foreign workers), letters of employment offer (for Malaysian workers). The contracts contain conditions of pay and terms of employment related to contract duration, regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. The employment contracts are signed in dual language, namely English/Bahasa Indonesia, English/Hindi, English/Bengali as the case may be. This is to enable foreign workers from the respective countries understand the contents of the employment contracts.
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	YES	The employment contracts signed between the estate/mill management contain employment and payment terms and provisions covering duration of employment, place of work, salary, working hours, medical, accommodation, SOCSO, transportation, public holidays, sick leave, annual leave, mutual termination of service, etc. These are all in compliance with the provisions of the Employment Act 1955. The pay slip is the document that give accurate information on compensation for all work performed. It contains the following information: employee name, IC/passport, gang, month of pay, pay description, (basic, price bonus, productivity incentive, allowances, deductions for SOCSO, EIS, KSWP, total income for the month, total deductions, net pay. None of the workers have family members working to help them with their work.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	NO	Generally, there was evidence that regular working hours, deductions, sickness, holiday entitlement, maternity leave, are observed in accordance with the Employment Act 1955. This was verified from the mill workers' employment contracts, punch cards and interviews with the workers themselves. They are also entitled to at least 30 minutes' rest after 5 hours of work. Similarly, workers with medical certificates are given a paid medical leave, and female workers are given 3 months maternity leave. There is no evidence of termination, and so compliance with reasons for dismissal and period of notice could not be verified during this audit. However, Selaba Palm Oil Mill was not able to demonstrate compliance with the conditions for overtime work imposed by the Labour Department under Section 60A(4)(a) Employment Act 1955. Therefore, a Major Non-Compliance NCR RZ01 of 2020 was raised.

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Clause	Indicators	Comply Yes/No	Findings
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	YES	Evidence is available that Selaba POM and Cluny Estate provide adequate housing and facilities to its employees in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. Houses are provided rent free with free water and subsidized electricity. Each house has between 2 to 3 rooms and accommodate between 2 to 5 workers. The houses are generally in a good state of repair. Grass is mowed once a month and domestic waste cleared regularly. All workers interviewed affirmed the same. Foreign workers are provided with accommodation as stated in their employment contracts. Local workers too are offered accommodation, but those who are within the local communities prefer to live outside the estate/mill premises. Among the available amenities include, badminton/takraw/volleyball court, children's playground, places of worship, sundry shops and an activity hall.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	All units have its own canteen and grocery store which sells basic items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within its expiry period. Workers interviewed informed that they purchase items from these stores, but also since the estates and mill are easily accessible to the nearest town, they also go out to the towns. Workers could either pay in cash, or on credit.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following: <ul style="list-style-type: none"> • An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage 	YES	All sampled workers receive at least minimum wages based on Minimum Wages Order 2020 which came into effect on 1 February 2020. SOU 5a have also carried out the calculation of prevailing wages and in-kind benefits. The calculation took into account basic pay, paid leave, incentives, mobile phone top-ups, medical benefits, rice, rental, maintenance and utilities, medical costs, transport, utilities, transport allowance, field and playground maintenance. The breakdown of the prevailing wage calculation is therefore RM1,470.7 (Malaysian workers) and RM1,676.10 (foreign workers).

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Clause	Indicators	Comply Yes/No	Findings
	<p>payment.</p> <ul style="list-style-type: none"> The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>		
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	Based on documents sighted and interviews conducted, Cluny Estate and Selaba POM employ full-time employees. There was no casual, temporary or day labour employed as evidenced by documents sighted and interviews conducted with workers and management.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	YES	Recognition of freedom of association is available in SDP's Human Rights Charter 2020. Paragraph 3.2.4 states commitment to respect freedom of association, respecting the rights of employees to form and join unions and bargain collectively. And in jurisdictions where this right is limited, SDP we will provide alternative means of employee engagement and grievance redressal.
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	YES	Records of meetings between NUPW representatives of Selaba POM and Cluny Estate management were made available and reviewed during the audit. These minutes were prepared in Bahasa Malaysia, and made available upon request. As confirmed by the NUPW representatives from Selaba POM and Cluny Estate who were interviewed, their appointments were made after being freely elected by their co-workers.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	YES	Evidence was available that all worker representatives were freely appointed by the workers as confirmed by the NUPW representatives interviewed at Selaba POM and Cluny Estate.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and	YES	The formal Policy on protection of children and non-employment of children is contained in paragraph 3.3 of SDP's Human Rights Charter 2020. Paragraph 3.3.1 states that the Company would eradicate child labour in its supply chain and would not employ anyone below the age of 18 years.

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Clause	Indicators	Comply Yes/No	Findings
	included into service contracts and supplier agreements.		This undertaking to not hire child labour is included in all service contracts and supplier agreements.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	YES	Documentary evidence is available that minimum age requirements are met. This is based on workers' check roll list and copies of their passport/NRIC details. Based on workers' NRIC and passports, all workers were at least 18 years old when employed.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements are met throughout Selaba POM and Cluny Estate. Personnel files reviewed contain copies of the workers' NRIC or passports with their respective pictures.
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	YES	Selaba POM was able to demonstrate communication about SDP's Human Rights Charter 2020 in Nov 2020 inside the brief that was sent to its stakeholders.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	The formal Policy on prevention of sexual and other forms of harassment and violence exists in SDP's Human Rights Charter 2020. Paragraph 3.2.6 of the HRC Charter 2020 states that the Company would create a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. Based on interviews conducted with female workers at the Selaba POM and Cluny Estate, as well as with the Gender Committee members, this Policy is being implemented as they confirmed that there has been no violence of sexual harassment.
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	YES	The formal Policy on prevention of sexual and other forms of harassment and violence. Paragraph 3.2.5 states that the Company would facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. Based on interviews conducted with female workers at the Selaba POM and Cluny Estate, as well as with the Gender Committee members, this Policy is being implemented as they confirmed that their reproductive rights are assured i.e. freedom to plan their own family, paid maternity leave, right to take time off to nurse their child, and pregnant female workers are given light work.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to	YES	Based on interview conducted with the Gender Committee representatives, the needs of new mothers will be assessed using a form known as the "New Mother Assessment Form". However, during this audit, there has been no evidence of any new mothers and

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Clause	Indicators	Comply Yes/No	Findings
	address the needs that have been identified.		therefore this indicator could not be verified.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	YES	A grievance mechanism which respects anonymity and protects complainants is in place at the CU as per the Sime Darby Gender Committee Handbook 1st Edition 2014. Additionally, SDP has also established Suara Kami which was approved and became effective on 15 April 2020.
6.6 No forms of forced or trafficked labour are used.	<p>6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 	YES	Selaba POM and Cluny Estate were able to demonstrate that all sampled workers have entered into employment voluntarily. Foreign workers (harvesters, sprayers, mill workers), are not subjected to contract substitution and no discriminatory practices against foreign workers was observed.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	Employment procedures for foreign workers exists under SOPP Workforce Management Unit, WMU/LR-SOPP/JAN2016/R1 which provides the procedures for recruitment, selection and hiring. A post-arrival briefing is also given, in particular on the contents of their employment contracts, safety, benefits, etc.
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	YES	Safety and Health Committee organization was established in July 2018. With Workers and Management representation. The Mill & Estate Manager, were appointed as the Chairman of their respective ESH committees. Their letters of appointment were signed by Regional General manager. The safety meetings were held every 3 month. The agenda discussed follows the guidelines provided by regional sustainability unit. Discussions as sighted in the minutes are bilateral involving participation from both employer and employees. Additional issue deemed important by the committee are included in the discussion.
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national	YES	Accident and emergency procedures are available in adherence to the SPSB policy on 'Crisis Management & Emergency Response' plan - chapter 13 of PQMS, OSH manual and "Accident and Reporting and Investigation Procedure" in chapter 14 of the same manual.

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Clause	Indicators	Comply Yes/No	Findings
	languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	YES	All workers involved in potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. From interviews conducted with workers and staffs in the field and stores clerks it was established that they had been trained and were aware of safe handling procedures. Sanitation facilities for spraying and manuring operator was available at the store area with facilities such as shower room, washing machine, PPE rack, soap, etc. All the workers are understood and aware related to SOP after chemical application.
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	YES	All workers had been provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Records of all accidents are kept and filed in the Mill and both Estates for a minimum period of 10 years. All occupational injuries were recorded using LTA (Lost Time Accident). Cases if any are reviewed during safety meetings. The incidences were summarized in the mandatory JKPP 6, JKPP 7 & JKPP 8 forms. The JKPP 8 form a It is also a mandatory requirement that the JKPP 8 form be submitted to DOSH by January of the subsequent year. Records are kept in the office.

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

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

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section 15 -Plant Protection and that no prophylactic use of such pesticides would be permitted.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	There was evidence that species referenced in the Global Invasive Species Database and CABI.org are to be used in managed areas, as per site visited and document review. Management has recorded in the document integrated pest management (IPM) invasive species record.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances i.e. where no other effective methods exist, and with prior approval of government authorities.	YES	Selaba SOU continued to use the Sime Darby Plantation Berhad's policy of no open burning. As advocated, both estates practised Zero burning thus no use of fire for pest control. In the 2020 replants visited during the audit in the estate, it was evident that all palms were felled, shredded, windrowed and left to decompose. Furthermore, there had been no serious outbreak of pest attacks on the Estate.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	Cluny SOU continued to use agrochemicals based on its Agricultural Reference Manual (ARM) Section 15 and 16, SSOP and Pictorial Safety Standard Book (PSS) where written justifications had been provided for various fields operations. The Manual has included a chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estate continued to use pesticides as per the SOPs.
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	YES	Cluny Estate had records to show the types of pesticides used with active ingredients and their LD50, where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	Cluny estate were committed to minimise the usage of agrochemicals by implementing IPM. Blanket spraying was not practised by this SOU and soft grasses maintained in the field. As part of the IPM plans, the management of all the estate had established beneficial plants (<i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> , and <i>Turnera subulata</i>) nurseries for continuous planting in order to attract natural predators and thus reducing the use of insecticides. EFB applied at immature & mature areas was applied in single layers and is not dumped in large amounts to prevent breeding of Rhinoceros Beetles.
	7.2.4 There is no prophylactic use	YES	There was no evidence of any prophylactic use of pesticides except in immature and young fields,

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Clause	Indicators	Comply Yes/No	Findings
	of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.		where prophylactic spraying using diluted cypermethrin was still practiced for the control of Rhinoceros Beetle as per SOP.
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	YES	Cluny Estate only used pesticides that are officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision Pesticides Act 1974 (Act 149) (Section 53A); and in accordance with USECHH Regulations (2000). There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used. The chemical store and chemical list indicated both estates had none of the chemicals. The use of paraquat was banned in all SDPSB estates. Most pesticides used were class III & class IV. All the 4 estates confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	As mentioned above in 7.2.5 of this checklist and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. The Estate had only used Class III and Class IV chemicals. Hence, the need for a judgment of the threat assessment does not apply on the Cluny estate.
	7.2.5b Why there is no other alternative which can be used.	YES	As mentioned above in 7.2.5 of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need for other alternatives does not arise.
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES	As mentioned above in 7.2.5 of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need as to which process was applied to verify why there is no other less hazardous alternative are not required.
	7.2.5d What is the process to limit the negative impacts of the application.	YES	As mentioned above in 7.2.5 of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need to limit the negative impacts of the application does not arise
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	As mentioned above in 7.2.5 of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need to estimation of the timescale of the application and steps taken to limit application to the specific outbreak does not arise.
	7.2.6 (C) Pesticides are only	YES	Records showed that pesticides were handled, used and applied by trained persons and as per the

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Clause	Indicators	Comply Yes/No	Findings
	handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers. Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.		MSDS of the pesticide. The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involve and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the MSDS training. It was also noted that MSDS are available at all sites during the audit. 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).
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149).
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	Disposed through DOE licensed contractors.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	YES	Aerial spraying was not practiced by Cluny Estate. This was also confirmed by interviewed workers.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	NO	CHRA for Cluny Estate was conducted on 05/08/2020 by the competent personnel. As per the recommendation from the CHRA assessment medical surveillance was conducted on yearly basis for foremen operator, monthly health surveillance by estate hospital attendant or VMO. However, annual Medical Surveillance for pesticide operators was not been carried out. Thus, #major NCR RAR 01 2020 has been raised.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other	YES	Cluny Estate complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation whereby no work with pesticides is given to pregnant or breast-feeding women. <i>Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan</i>). During site visits there was no breastfeeding women and under age of 18

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Clause	Indicators	Comply Yes/No	Findings
	people that have medical restrictions and they are offered alternative equivalent work.		workers involved in chemical applications.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	YES	Waste management plan documented and implemented.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	On Selaba CU waste disposal of both Scheduled and Domestic waste were dispesd according to established procedures that were understood by all (confirmed at interviews). The procedures for handling used chemicals classified under Environment Quality Regulation (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by certification & compliance unit.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit at all units of certification, there was no evidence of open burning had been used for waste disposal. Records showed that Domestic Waste was disposed at Majlis Pemandaran Landfill areas.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	Selaba SOU practiced the maintenance of long-term soil fertility by annual application of fertilizers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and some EFB and compost application, water management and by maintaining soft weeds within interlines. The SOP for manuring was in Section 8 of the Agricultural Reference Manual and Section 14 of the EQMS.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	Periodic tissue and soil sampling were carried out in Cluny Estate to monitor changes in nutrient status. Annual foliar sampling for the nutrients N, P, K, Mg, Ca & B had been carried out in Aug 2019. The results of these samplings will form the basis for the fertilizers input recommendation to maintain and improve soil fertility for 2020. The soil analysis provided the indication of soil health and monitor the changes in the organic carbon and total nitrogen. Soil sampling was carried out on a 5 year cycle basis.
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of EFB, POME, palm residues and optimal use of inorganic fertilisers.	YES	Cluny Estate continued to have a nutrient recycling strategy in place which included stacking of pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field and EFB mulching. For EFB application on both estates, priority was given for application in young mature areas and replants.
	7.4.4 Records of fertiliser inputs are maintained.	YES	Cluny Estate continued to monitor their fertilizer inputs as recommended by their agronomist, Sime Darby Research Sdn. Bhd who visited estates during the annual foliar sampling carried out in Aug 2019. Fertiliser application program was monitored using records like manuring master plan, program sheets, bin cards, field cost book, manuring audits by Planning and Monitoring Department under Upstream Department from headquarters. Records of programs and applications of fertilisers were made available to auditors.

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Clause	Indicators	Comply Yes/No	Findings
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	During the field visit and the soil maps provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in Selaba SOU. The soil series available in Cluny Estate are Munchong, Seremban/Munchong, Gajah Mati, Rasau. Alluvium/colluvium, and Telemong / local alluvium.
	7.5.2 No replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	Cluny Estate had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by: <ul style="list-style-type: none"> Slope & River Protection Policy updated on January 2015. Buffer Zone & 25degree slope and in item 8 Section 4 Land Preparation for Terracing in ARM Manual. It was observed that no replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the SOU.
	7.5.3 There is no new planting of oil palm on steep terrain.		It was observed that there was no new planting of oil palm on steep terrain.
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	YES	Cluny Estate had a management strategy for palm oil cultivation, taking into account the soil maps and surveys identifying marginal and fragile soils, including steep terrain for the palm oil long term suitability. The soil maps were provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in the estate.
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	Soils maps prepared in Feb 2015 by Sime Darby Research unit shows that there are no fragile soils in CU. During the field visit and the soil maps provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in Cluny Estate.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	The management of Cluny Estate continued to use Soil surveys and topographic information guide in the planning of drainage and irrigation systems, roads and other infrastructure. Soils maps and slope maps prepared in Feb 2015 by Precision Agriculture Unit of Sime Darby Research unit were used.
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	YES	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to estate. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Cluny Estate. Furthermore, as per the soil maps and site visits there are no peat soils on estate.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November	YES	Based on site visits and the soils maps dated February 2015 prepared by R&D – Precision Agriculture Unit and site visits there are no peat soils on Cluny estate.

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Clause	Indicators	Comply Yes/No	Findings
	2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).		
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	There was no peat soils in Cluny Estate based on the new soils map provided by Precision Agriculture Unit (AJZ) of Sime Darby Research and site visit
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	There was no peat soils in Cluny Estate based on the new soils map provided by Precision Agriculture Unit (AJZ) of Sime Darby Research and site visit
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit	YES	There was no peat soils in Cluny Estate based on the new soils map provided by Precision Agriculture Unit (AJZ) of Sime Darby Research and site visit

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Clause	Indicators	Comply Yes/No	Findings
	other alternate methodologies to be considered by RSPO for recognition.		
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	YES	There was no peat soils in Cluny Estate based on the new soils map provided by Precision Agriculture Unit (AJZ) of Sime Darby Research and during site visit
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.	YES	There was no peat soils in Cluny Estate based on the new soils map provided by Precision Agriculture Unit (AJZ) of Sime Darby Research and site visit
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	YES	All estates had in place and implemented water management plans. Plans for 2020 were sighted. The water management plans were tailored towards how to reduce rainwater collection, to Improve user awareness and domestic use.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.		

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Clause	Indicators	Comply Yes/No	Findings												
	7.8.1b Workers have adequate access to clean water.														
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	YES	During site visit at field at Block 05D unnamed stream was maintained with natural grasses and at field 2016A near Bernama River was maintained the buffer zone as per guidelines. There were no evidence chemical activities has been conducted at buffer zones areas.												
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially BOD, is regularly monitored.	YES	<u>EQ (Prescribed Premise) Crude Palm Oil Regulations 1977</u> <ul style="list-style-type: none"> • License number and validity period – 004235, (valid until 30/06/2021.), 40mt/hr • Discharge method – Water course. • Effluent analysis tests for final discharge were carried out on a monthly basis through internal accredited lab from Sime Darby Research Sdn Bhd, Carey Island. The results were within the limit. 												
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Selaba POM continued to monitor and record water use per tonne of FFB.												
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	<p>Plan for improving efficiency of the use of fossil fuels and to optimize renewable energy has established such as:</p> <table border="1"> <thead> <tr> <th>No.</th><th>Energy</th><th>Action plan</th><th>PIC</th></tr> </thead> <tbody> <tr> <td>1</td><td>Diesel</td><td>-servicing vehicle in timely manner and on contractual basis to ensure efficient use of fuel and preventive maintenance to avoid leakages. -to educate workers by having program on fuel saving practices i.e turn off the engine when vehicle not in used. -no open burning at linesite</td><td>Assistant manager & foremen</td></tr> <tr> <td>2.</td><td>Electricity</td><td>-installing energy saving appliances, replacing energy saving bulb at workers quarters and using photo -ensor to light up street light & compound spotlight. -educate workers on saving energy usage i.e turn off electric switch when not in use</td><td>Assistant Manager & QA</td></tr> </tbody> </table> <p>A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2020, identified in the following</p>	No.	Energy	Action plan	PIC	1	Diesel	-servicing vehicle in timely manner and on contractual basis to ensure efficient use of fuel and preventive maintenance to avoid leakages. -to educate workers by having program on fuel saving practices i.e turn off the engine when vehicle not in used. -no open burning at linesite	Assistant manager & foremen	2.	Electricity	-installing energy saving appliances, replacing energy saving bulb at workers quarters and using photo -ensor to light up street light & compound spotlight. -educate workers on saving energy usage i.e turn off electric switch when not in use	Assistant Manager & QA
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			i) Environmental Aspect Identification Summary FY 2020 reviewed accordingly. ii) Environmental Impact Evaluation Summary FY 2020 reviewed accordingly.																																																										
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	YES	<p>GHG emission has been identified and assessed to the all estates and mill through list of waste, EIA, pollution prevention plan, etc. for year 2019. CU calculated the emission through RSPO Palm GHG calculator version 4 (data as table below). CU also submitted GHG footprint report to the RSPO and RSPO annual communication of progress (ACOP) (publicly available report)</p> <p><u>Summary of net GHG emissions from PalmGHG calculator</u></p> <p>Summary of Emissions</p> <table><tr><th>Description</th><th>tCO₂e/tProduct</th><th>Extraction Rate</th><th>%</th></tr><tr><td>CPO</td><td>1.37</td><td>OER</td><td>19.97</td></tr><tr><td>PK</td><td>1.37</td><td>KER</td><td>5.30</td></tr></table> <table><tr><th>Land Use</th><th>Ha</th></tr><tr><td>OP Planted on mineral soil</td><td>20335.54</td></tr><tr><td>OP Planted on Peat</td><td>0</td></tr><tr><td>Conservation (forested)</td><td>0</td></tr><tr><td>Conservation (non-forested)</td><td>0</td></tr><tr><td>Total</td><td>20335.54</td></tr></table> <p>Summary of Plantation/field emissions and sink</p> <table><tr><th rowspan="2">Description</th><th colspan="3">Own</th><th colspan="3">Group</th></tr><tr><th>tCO₂e</th><th>tCO₂e/ha</th><th>tCO₂e/tFFB</th><th>tCO₂e</th><th>tCO₂e/ha</th><th>tCO₂e/tFFB</th></tr><tr><td>Land conversion</td><td>13754.31</td><td>4.39</td><td>0.79</td><td>10715.89</td><td>0.62</td><td>0.58</td></tr><tr><td>CO₂ emission from fertiliser</td><td>899.22</td><td>0.29</td><td>0.05</td><td>1329.45</td><td>0.08</td><td>0.07</td></tr><tr><td>N₂O emission frm fertilizer</td><td>470.98</td><td>0.15</td><td>0.03</td><td>1035.18</td><td>0.06</td><td>0.06</td></tr></table>	Description	tCO ₂ e/tProduct	Extraction Rate	%	CPO	1.37	OER	19.97	PK	1.37	KER	5.30	Land Use	Ha	OP Planted on mineral soil	20335.54	OP Planted on Peat	0	Conservation (forested)	0	Conservation (non-forested)	0	Total	20335.54	Description	Own			Group			tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/tFFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/tFFB	Land conversion	13754.31	4.39	0.79	10715.89	0.62	0.58	CO ₂ emission from fertiliser	899.22	0.29	0.05	1329.45	0.08	0.07	N ₂ O emission frm fertilizer	470.98	0.15	0.03	1035.18	0.06	0.06
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			Fuel consumption	122.17	0.04	0.01	98.96	0.01	0.01
			Peat Oxidation	0	0	0	0	0	0
			Crop sequestration	-13037.25	-4.16	-0.75	-10155.71	-0.59	-0.55
			Sequestration in conservation area	0	0	0	0	0	0
			Total	2209.43	0.71	0.13	3023.77	0.18	0.16
			Summary of Mill emission and credits						
			Description			tCO2		tCO2e/tFFB	
			POME			31231.47		0.20	
			Fuel Consumption			18.19		0.00	
			Grid Electricity Utilisation			287.94		0.00	
			Export of Excess Electricity to Housing & Grid			0.00		0.00	
			Sale of PKS			0.00		0.00	
			Sale of EFB			0.00		0.00	
			Total			31537.60		0.20	
			Palm Oil Mill Effluent (POME) Treatment						
Diverted to compost			0%						
Diverted to anaerobic digestion			100%						

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Clause	Indicators	Comply Yes/No	Findings																			
			<table><tr><th colspan="2">POME Diverted to Anaerobic Digestion</th></tr><tr><td>Diverted to anaerobic pond</td><td>100%</td></tr><tr><td>Diverted to methane capture (flaring)</td><td>0%</td></tr><tr><td>Diverted to methane capture (electricity generation)</td><td>0%</td></tr></table>	POME Diverted to Anaerobic Digestion		Diverted to anaerobic pond	100%	Diverted to methane capture (flaring)	0%	Diverted to methane capture (electricity generation)	0%											
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	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	YES	Auditors has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at SOU Selaba Hence, RSPO GHG Assessment Procedure for New Development was not applicable.																			
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	<p>Cluny Estate had established the <i>Pollution Prevention Plan 2020/21</i> among others addressing the following environmental issues;</p> <table><tr><th></th><th>Issues</th><th>Mitigation measures</th></tr><tr><td>1</td><td>Leakage of pesticide during chemical mixing</td><td>to recollect water used at chemical mixing area to be recycled during mixing to construct containment sum at chemical mixing area to contain leakages</td></tr><tr><td>2</td><td>Contaminated ground / soil at workshop area</td><td>to replace tray whenever tractors / machines under repairing progress to avoid oil spillage on the ground periodic checking on oil sump to ensure it is well maintained and to avoid any leakages</td></tr><tr><td>3</td><td>Prohibited spraying at line site</td><td>education to workers not to spray at the line site and explain reason for such a directive. periodic checking at the line site</td></tr><tr><td>4</td><td>Prohibited spraying & fertilizer or chemical near the river (buffer zone)</td><td>provide training and create awareness to workers identifying and marking the buffer zones</td></tr></table> <p>The significants pollutants in the mill has been identified in the pollution prevention Plan – FY 2020.</p> <table><tr><th>Environmental issue</th><th>Mitigation measures</th></tr><tr><td>To reduce dark smoke emission</td><td>-Quarterly stack sampling has been carried out bv external bodies</td></tr></table>		Issues	Mitigation measures	1	Leakage of pesticide during chemical mixing	to recollect water used at chemical mixing area to be recycled during mixing to construct containment sum at chemical mixing area to contain leakages	2	Contaminated ground / soil at workshop area	to replace tray whenever tractors / machines under repairing progress to avoid oil spillage on the ground periodic checking on oil sump to ensure it is well maintained and to avoid any leakages	3	Prohibited spraying at line site	education to workers not to spray at the line site and explain reason for such a directive. periodic checking at the line site	4	Prohibited spraying & fertilizer or chemical near the river (buffer zone)	provide training and create awareness to workers identifying and marking the buffer zones	Environmental issue	Mitigation measures	To reduce dark smoke emission	-Quarterly stack sampling has been carried out bv external bodies
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			<div>-Carry out routine maintenance Install CCTV link direct to DOE</div> <div>Waste water discharge through land</div> <div>-Regularly effluent ditches and its surrounding for leakage. -to conduct clean up all the trap regularly</div> <div>Chemical and lubricant spillage</div> <div>-to ensure used oil and rag in drums are properly stacked and well contained -to clean regularly all the sand and oil trap</div>
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	<p>Cluny Estate complied to the strict Zero Burning Replanting Technique practiced in relation to all new plantings, replanting or other development which published in their website http://www.simedarbyplantation.com/sustainability/beliefs-progress/practices-key-initiatives/good-agricultural-practices/zero-burning-replanting-technique.</p> <p>There was no evidence to show that fire had been used for preparing land for replanting. In the 2019 areas. during the audit in both estates, it was evident that all palms were felled, shredded, windrowed and left to decompose</p>
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	Selaba SOU had established fire prevention and control measures for the areas under its direct management.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	Selaba SOU had engaged adjacent stakeholders on fire prevention and control measures via stakeholder meetings. Minutes showed that a Stakeholders meeting was held on 10/12/ 2020. One of the topics discussed was the 5 KM Radius Zero burning Commitment under Fire Prevention and control measure.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	YES	No new land clearing since Nov 2015 available at SOU Selaba, thus this Indicator was not Applicable.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	<p>SOU Selaba has reviewed their HCV with new assessment conducted on December 2015. The new HCV assessment titled 'HCV Re-Assessment For SOU 5 – Seri Intan / Selaba which included both the planted area and relevant wider landscape-level considerations with villages and forest reserved. Based on the HCV assessment report, there is only HCV 4 declare in SOU Selaba, and the total area of HCV area for SOU Selaba is 6.49ha HCV area.</p>
	7.12.2a For existing plantations with an HCV assessment		

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Clause	Indicators	Comply Yes/No	Findings
	<p>conducted by an RSPO-approved assessor and no new land clearing after 15 Nov 2018, the current HCV assessment of those plantations remains valid.</p> <p>7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p>		
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).	YES	Progress of implementation of the action plans 'HCV Management Plan FY: 2020 Objectives & Target were reviewed and verified on the ground.
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and	YES	HCV Re Assessment has been done in Dec 2015, but no rights of local communities have been identified in HCV areas. Thus, this indicator was not applicable.

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Clause	Indicators	Comply Yes/No	Findings
	other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.		
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	YES	Although there was no RTE species found in the CU, SOU Selaba still conduct programme to regularly educate the workforce about the status of RTE species in Malaysia, for Cluny on 5/10/20, for all workers. Sime Darby also still established their own disciplinary measures if any of their staff or workers found to capture, harm, collect or kill the RTE species. If found any activities to capture, harm, collect or kill RTE species, the estates will make a report to the Wildlife Department immediately.
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	YES	Progress of implementation of the action plans 'HCV Management Plan FY: 2020 Objectives & Target – for Cluny Estate were reviewed and verified on the ground. Cluny Estate has conducted an on-going monitoring of their HCV4 the latest conduct by quarterly basis. Noted the CU had continued to implement planned actions such as awareness to the staffs and public on enhancing biodiversity, posting of relevant information in the Sime Darby webpage and erection of signage at strategically locations. The outcomes of monitoring will be feedback into the next year action plan.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	YES	Not applicable since there is no new land clearing

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Clause	Indicators		Comply Yes/No	Findings
<p>4.5.3 Time-bound plan</p> <p>Note: Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;</p>	(a)	<p>As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.</p>	YES	<p>SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.</p> <p>Indonesia</p> <p>PT Bahari Gembira Ria Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%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. 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>Liberia As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI).</p> <p>Papua New Guinea (NBPOL) Markham Farming Company Limited (MFCL) / Markham Agro Pte. Ltd. Estimate to be certified on year 2020. The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore, the Remediation and Compensation Procedure will be required to be full filled in order to achieve certification. The Disclosure has been initiated on 18/10/18. Currently HCV/HCS,</p>

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				SEIA and LUCA are being undertaken in order to submit and mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration. https://rspo.org/certification/remediation-and-compensation/racp-tracker no 82
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	YES	Time bound plan was reviewed by CB and it can be confirmed that there were several changes to the current time bound plan as verified during this audit.
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local	YES	Time bound plan was verified by CB and it can be confirmed that there were several changes to the current time bound plan as verified during this audit. Liberia has receive and extension of Timebound Plan which is until 2020 and PT Mitra Austral Sejahtera has been sold to PT Inti Nusa Sejahtera Refer letter dated 27/6/2019 to RSPO Secretariat and announcement at Bursa Malaysia http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965 .

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		notary or chamber of commerce (or equivalent);		
4.5.4 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1 st January 2010 shall comply with the RSPO NPP. For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	YES	Based on internal and external audit (ISPO certified) there was no replacement of primary forest or HCV areas in the uncertified management unit. Except for NBPOL area which have potential liabilities of RSPO grower members and the stages of the Remediation and Compensation Procedures (RaCP) that the management units (MUs) are currently undergoing. https://rspo.org/certification/remediation-and-compensation/racp-tracker no 82
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6;	YES	Regular discussion was ongoing between Sime Darby Plantation and the group of community (PAC) through bi-monthly Tim Kerja Perwakilan Petani (TKPP) meeting since November 2012. In October 2013, representatives from two of nine villages (Kerunang and Entapang) left TKPP. These two villagers are supported by and working with TuK and OXFAM. They have then requested SDP to enter into Dispute Settlement Facility (DSF) in June 2014. Hence, there were two groups of communities: The TKPP (7 of 9 villages) and the Kerunang & Entapang team (2 of 9 villages). 21 TKPP meetings have been conducted. The most recent one was held on 2/11/2016. Issues related to the 14 demands made by TKPP were closed except for two. As per current status (23/01/2019) SDP and affected parties will be resolved all the issues to proceed with legal review. https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail However, sighted as at June 2019 PT Mitra Austral Sejahtera has been sold to PT Inti Nusa Sejahtera Refer letter dated 27 June 2019 to RSPO Secretariat and announcement at Bursa Malaysia http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in acc. with RSPO P&C criterion 6.3;	YES	Based on the internal audit report, there were no labour dispute that were not being resolved yet through an agreed process for all uncertified units for all 7 uncertified units of Sime Darby Plantation Sdn Bhd - Indonesia as at June 2019.
	(d)	Legal non-compliance, if any, is being	YES	Based on internal and external audit (ISPO certified) there was no legal non-compliance recorded at the CU.

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		addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;																				
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 4.5.4 (a) – (d) above by the audit team based on self- declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:	YES	SDP PT Mitral Austral Sejahtera already ISPO certified by MUTU Certification International on 30/11/2017 and there was no issue on legal non-compliance for all uncertified unit. However, it has ben noted that as at June 2019, PT Mitra Austral Sejahtera was sold to PT Inti Nusa Sejahtera. Refer letter dated 27/6/2019 to RSPO Secretariat and announcement at Bursa Malaysia http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965																		
		<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><tr><th>#</th><th>Name of SOU</th><th>Name of Units</th><th>Positive assurance statement and self-assessment</th></tr><tr><td>1</td><td>PT Sime Indo Agro</td><td>East Sei Mawang</td><td>Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor</td></tr><tr><td>2</td><td>PT Ladang Rumpun Subur abadi</td><td>Subur Abadi Plasma 1</td><td>Internal assessment has been conducted for Subur Abadi Plasma 1 on 22/2/2017. The Subur Abadi Plasma 1 Scheme is currently undergoing RSPO Certification under PT Ladangrumpun Suburabadi pending certification. RSPO Pre-assessment has been completed on 20-24/3/2017. The contract between the Certification Body (PT Mutuagung Lestari) and PT Ladangrumpun Suburabadi is available (dated 6/3/2017) which includes the scope of the supply base of Subur Abadi Plasma stated under Clause 2, 1a. There is no outstanding land and social conflicts on the ground. HCV Assessment for Subur Abadi Plasma smallholders have been conducted (by Pollito) in July 2011 before commencement of any new planting. Land Use Change Analysis for the Plasma is in progress.</td></tr><tr><td>3</td><td>PT Bersama Sejahtera</td><td>KKPA BSS</td><td>New smallholder project currently under preparation to undergo RSPO Certification by 2019. internal audit for PT BSS has been</td></tr></table>	#	Name of SOU	Name of Units	Positive assurance statement and self-assessment	1	PT Sime Indo Agro	East Sei Mawang	Internal assessment was conducted on 29 May – 3 June 2017 by PT Mutuagung Lestari Auditor	2	PT Ladang Rumpun Subur abadi	Subur Abadi Plasma 1	Internal assessment has been conducted for Subur Abadi Plasma 1 on 22/2/2017. The Subur Abadi Plasma 1 Scheme is currently undergoing RSPO Certification under PT Ladangrumpun Suburabadi pending certification. RSPO Pre-assessment has been completed on 20-24/3/2017. The contract between the Certification Body (PT Mutuagung Lestari) and PT Ladangrumpun Suburabadi is available (dated 6/3/2017) which includes the scope of the supply base of Subur Abadi Plasma stated under Clause 2, 1a. There is no outstanding land and social conflicts on the ground. HCV Assessment for Subur Abadi Plasma smallholders have been conducted (by Pollito) in July 2011 before commencement of any new planting. Land Use Change Analysis for the Plasma is in progress.	3	PT Bersama Sejahtera	KKPA BSS	New smallholder project currently under preparation to undergo RSPO Certification by 2019. internal audit for PT BSS has been		
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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 22/2/2017. The Subur Abadi Plasma 1 Scheme is currently undergoing RSPO Certification under PT Ladangrumpun Suburabadi pending certification. RSPO Pre-assessment has been completed on 20-24/3/2017. The contract between the Certification Body (PT Mutuagung Lestari) and PT Ladangrumpun Suburabadi is available (dated 6/3/2017) which includes the scope of the supply base of Subur Abadi Plasma stated under Clause 2, 1a. There is no outstanding land and social conflicts on the ground. HCV Assessment for Subur Abadi Plasma smallholders have been conducted (by Pollito) in July 2011 before commencement of any new planting. Land Use Change Analysis for the Plasma is in progress.																			
3	PT Bersama Sejahtera	KKPA BSS	New smallholder project currently under preparation to undergo RSPO Certification by 2019. internal audit for PT BSS has been																			

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				Sakti		undertaken, the latest internal audit has been conducted on 21/4/2018.
				4	PT Bahari Gembira Ria	Plasma BGR
						There is no outstanding social and land conflicts on the ground. The plasma scheme has already undergone HCV Assessment (conducted by Pollito) in July 2011 before commencement of New Planting. Land Use Change Analysis is in progress.
						Confirmation of the status is in progress. Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servlet.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 Pecconina Indonesia	Sungai Jernih Estate and GPI KKPA
						Sungai Jernih Estate and GPI KKPA were audited by Mutuagung as verified through Recertification Audit report. The assessment was conducted on 15 – 20/5/2017.
				6	PT Sandika Nata Palma	Karya Palma KKPA SNP
						Internal assessment was conducted on 10/2/2017.
				7	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Sungai Putih (PT BAL) Beturus (PT BAL) KKPA BAL
						Internal assessment was conducted on 18 – 23/9/2016. This PT also has conducted Stage 1 audit on RSPO Certification System, P&C RSPO (2016) and RSPO Supply Chain Certification Standard on 17 – 22/4/2017.
						Smallholder project – targeted for certification by 2020.
		<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 	YES	PT Mutuagung Lestari had conducted the consultation with relevant NGO's as verified by audit team through the Mutuagung Assessment Report.		
		<ul style="list-style-type: none"> 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 	YES	Further information can be obtained from https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail . However, Sighted as at June 2019 PT Mitra Austral Sejahtera has been sold to PT Inti Nusa Sejahtera Refer letter dated 27/6/2019 to RSPO Secretariat and announcement at Bursa Malaysia		

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		consultation or field inspection, assessing the risk of any non-compliance with the requirements.		http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965
4.6.4 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.		No additional indicators	YES	As it has been mentioned in 2.2.1 of this checklist, The Land Title for All Estate has been verified, for all estates. The Land Title was under the name of Sime Darby Plantation Bhd. Each estate had legal use of the land through Lands and Surveys Department following the payment of premium and Land fee. Based on this, it has been confirmed that there was no such case concerning the rights of local communities or indigenous people in the SOU.
<p>Note:</p> <p>1. For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&C. For example, if an NC against a major indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless that is actively addressed;</p> <p>2. Failure to address any outstanding NC within uncertified unit(s) regarding 4.5.4 (a)-(d) may lead to certificate suspension(s) to the certified unit(s), in accordance with the provisions of these Certification Systems.</p>				

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Attachment 4

Details of Non-conformities and Corrective Actions Taken

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
3.8.7 MZK 01 2020	Major	<p>Finding : There is projected overproduction of certified tonnage.</p> <p>Objective evidence : Sighted that overproduction Projected FFB, CPO and PK for period Dec 2019 - Nov 2020 which is projected 31,393.81 mt (FFB), 6,379.22 (CPO), 1,594.81 (PK) and actual production of 68,847.19 (FFB), 13,571.49 (CPO), 3,299.16 (PK) which is more than projected, and Selaba POM yet to inform the CB and apply extension to the RSPO.</p>	<p>Correction: To inform and request the approval of the FFB tonnage production extension to Certified Body.</p> <p>Corrective Action: The monitoring of the certified FFB production in line with the projected/budgeted approval on monthly basis. Mill to submit the summary of the FFB process to Regional Sustainability Management for review.</p> <p>Requisition of extension if there are production already achieved 70% of the projection and yet to reach the final quarter of the Financial Year.</p>	<p>Auditor received the evidence Palm Trace extension request on 30 December 2021 and sighted RSPO has approved on 31 December 2021 Auditor also has received evidence of monitoring records for FFB, CPO and PK until February 2021 and found acceptable.</p> <p>Status: Closed The effectiveness of implementation will be verified during next audit</p>
6.2.3 RZ 01 2020	Major	<p>Finding: Selaba Palm Oil Mill was not able to demonstrate compliance with the conditions for overtime work imposed by the Labour Department under Section 60A(4)(a) Employment Act 1955.</p> <p>Objective evidence: The following sampled workers at Selaba Palm Oil Mill were found to have worked as follows:</p> <ol style="list-style-type: none"> 1. Ashik and Worker No. 129826 worked overtime in excess of 4 hours on their rest days. This is contrary to paragraph 2(ii) of the JTK permit dated 2 March 2017 (Ref BHG PU/9/134 JLD 9(11) which states that if the worker is required to work on his rest day, overtime must not exceed 4 hours. 2. No written consent from all sampled workers were obtained. This is contrary to paragraph 2 (iii) of the JTK permit dated 2 March 2017 (Ref BHG PU/9/134 JLD 9(11) which states that a written consent from the workers must be obtained. 	<p>Correction: To cease the unauthorized extra Over Time exceeding JTK approved limit immediately (1/1/2021).</p> <p>Corrective Action Plan: Monitoring the manhours on daily basis by the assistant mill. Additional hours (more than 7 hours/weekday or 4 hours in rest day) is not allowed.</p> <p>The workplan for overtime will be offer to workers a day before commencement of work on the next day.</p> <p>To hire the new workers as per mill's manpower budget.</p>	<p>Auditor received the evidence workplan for overtime, List of workers overtime during rest days/Public Holiday and Borang Permohonan for Overtime all dated 19/2/21 and monitoring records Feb 21 and found acceptable.</p> <p>Status: Closed The effectiveness of implementation will be verified during next audit</p>
3.4.3 RZ 02 2020	Major	<p>Finding: Selaba Palm Oil Mill and Cluny Estate social action management and monitoring plan were not implemented,</p>	<p>Selaba POM : Correction:</p>	<p>Auditor received the evidence meeting with workers representative</p>

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		<p>reviewed and updated with the participation of affected stakeholders.</p> <p>Objective Evidence: Selaba Palm Oil Mill and Cluny Estate could not demonstrate that the social action plans were implemented, reviewed and updated with participation of affected stakeholders. As a result, the following social-related issues was not being identified and assessed:</p> <p>Selaba POM: Assessment on the impact of reduced overtime hours on workers' income; Assessment of impacts on workers' amenities (namely, car garage at the housing area) following the budget curtailment. Assessment of workers' concern and sentiment towards the challenges posed at the workers' housing by a resident's son.</p> <p>Cluny Estate: Assessment of workers' right to adequate food and food security following the decision to clear vegetables planted behind Block B before providing a readily available alternative site for planting vegetables.</p>	<p>a. To conduct a feedback study on the overtime issue affecting on worker's income. The management will be carried out the meeting with availability of worker representative (as observer) to discuss on the feedback. Management will be presenting the outcome to all workers during muster/roll call.</p> <p>b. To conduct the assessment of the worker's need on the house garage (only for those who has a car or based on the house design). To allocate a budget and built the garage.</p> <p>c. To conduct the assessment on worker's sentiment on the issue of aggressiveness of Disabled Person who is a son of a mill's worker.</p> <p>Corrective Action: Establishment of Employee Welfare Committee to cater all social issues in worker housing complex. The social issues raised by the employees will be discussing in EWC meeting on quarterly basis. The action to be taken will be updated in Social Management Plan.</p> <p>Cluny Estate: d) 1) Management already start in February 2021 "Green book" area and start to allocate who workers needed to plant the Vegetable. 2) Management already carry out assessment for every representative block leader to get approval for plant vegetable at "centralized" Green Book Area</p>	<p>regarding the son of workers impact, and evidence of assessment regarding garage and son of workers.</p> <p>Auditor also received evidence Employee Welfare Committee to cater all social issues in worker housing complex has been established, and establishment of Green Book Area and evidence that all block leader has been informed.</p> <p>Auditor also received SIA Management Plan has already updated regarding this Issue.</p> <p>Status: Closed The effectiveness of implementation will be verified during next audit</p>
7.2.10 RAR 01 2020	Major	<p>Finding : Requirement for Specific annual medical surveillance for pesticide operators was not complied with</p> <p>Objective evidence : Specific annual medical surveillance for pesticide operators not yet carried out. Last conducted on 29/10/2019.</p>	<p>Estate to conduct the medical surveillance to pesticide operator as per given NCR and will act accordingly from the recommendation given by the OHD.</p> <p>Estate management to confirm with the Head Office regarding this issue since the estate already followed the CHRA recommendation as per regulatory compliance.</p>	<p>Auditor has received the evidence quotation to do medical surveillance has been offer to Klinik K.S.Tan on 3/3/21 and wokers has gone to do medical Surveillance on 10/3/21. Currently the estate site has been waiting the report from Klinik and will act accordingly from the recommendation.</p>

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			Management will monitor the compliance of medical surveillance in the OSH Committee platform & SQM quarter review (SOU basis)	Status: Closed The effectiveness of implementation will be verified during next audit
3.3.3 RZ 03 2020	Minor	<p>Finding:</p> <ol style="list-style-type: none"> No record of monitoring and action taken against sundry shop at Cluny Estate for not complying with the warning letters issued by Manager dated 10 October 2020 and 10 Nov 2020. No record of monitoring and action taken to ensure medical practitioner (VMO) visits Cluny Estate and Trolak Division clinics as per the SOP for Primary Health Care Services in Plantation Doc No. SD/SDP/PSQM (ESH)/202-OH14 dated 1 March 2017. <p>Objective Evidence:</p> <ol style="list-style-type: none"> The sundry shop operator at Cluny Estate was found not to have complied with warning letters issued by Estate Manager dated 11 October 2020 and 10 November 2020 for having breached the following laws: <ul style="list-style-type: none"> Selling LPG without license under Section 16 Control of Supplies Act 1961. Operating business without license as required under Section 5(1) Registration of Businesses Act 1956. Selling hard liquor within Cluny Estate premises. VMO visits to the Cluny Estate and Trolak Division clinics were carried out only once a month not once a fortnight as per SOP for Primary Health Care Services in Plantation Doc No. SD/SDP/PSQM (ESH)/202-OH14 dated 1 March 2017 as follows: <ul style="list-style-type: none"> 14 Nov 2019, 5 Dec 2019, 17 Feb 2020, 19 June 2020, 1 July 2020, 13 August 2020, 5 Sept 2020, 14 Oct 2020, 16 Dec 2020. 	<p>Cluny Estate:</p> <ol style="list-style-type: none"> <ol style="list-style-type: none"> Sundry shop owners are unable to follow the regulation. Management did not renew the contract expired on 31/12/2020 and has given notice to close the Sundry shop starting 1 January 2021. Management has offered the opening new Sundry shop tender to anyone interested in renting a Sundry shop in accordance with the standard regulations. Periodic monitoring to check goods selling & price will be carried out monthly basis. <ol style="list-style-type: none"> The management has given a reminder letter to VMO to follow the visit twice a month as per SOP for Primary Health Care Services in plantation documents. If VMO still fails to provide cooperation to visit every 2 times a month, the management will find a replacement to new VMO. 	<p>Corrective Action Plan Accepted</p> <p>Status: Open The effectiveness of implementation corrective Action Plan will be verified during next ASA audit.</p>

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Attachment 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor
3.3.2 STK 01	Minor	<p>Finding:.. At time of visit consistent implementation of procedures was not in place</p> <p>Objective evidence: It was observed that during the audit that:</p> <ul style="list-style-type: none"> a) Selaba Oil Palm Mill: A grass cutter was not using all appropriate PPE. Cluny Estate: The foreman at the workshop was not using all appropriate PPE as per CHRA dated 26/06/2019 & 10/07/2019 b) Cluny Estate, Torlak Division: The emergency eye wash & shower had no water. 	<p>CU has monitored all safety precautions and PPE used by the employees during conducted work operation through morning briefing, daily site visit by assistants, staff and mandora, and work permit. Sighted all the employees works at POM & estate were wear appropriate PPE i.e safety helmet, boots, ear plug, glove, etc. Also was sighted all the PPE equipment's i.e helmets, boots, emergency shower, first aid boxes were in good condition. Thus, previous Minor NCR STK 01 2019 was satisfactory closed. Status: Closed</p>
7.8.2 STK 02	Major	<p>Finding:.. Water courses and wetlands were not well protected</p> <p>Objective evidence: It was observed that during the audit that: Bikam Estate, Sungkai Division</p> <ul style="list-style-type: none"> a. Buffer zone along the natural water way in field 2007S – palm circles had been sprayed clean and buffer zone not clearly demarcated. <p>There is no buffer maintained along River Sungai Klah in the 2019 replant.</p>	<p>During site visit at field at Block 05D unnamed stream was maintained with natural grasses and at field 2016A near Bernama River was maintained the buffer zone as per guidelines. There were no evidence chemical activities has been conducted at buffer zones areas. Thus, previous NCR STK 02 2019 was satisfactory closed. Status: Closed</p>

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SIME DARBY PLANTATION TIMEBOUND PLAN AS AT JAN 2020

Attachment 6 – Time bound plan

SDP - RSPO Certification for Time Bound Plan - Malaysia Operations

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

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		Flemington Estate	-		Certified		
		Bagan Datoh Estate	-		Certified		
		Sabak Bernam Estate	-		Certified		
		Sg. Samak Estate	-		Certified		
5	Seri Intan/Selaba	Seri Intan Oil Mill	-	Teluk Intan, Perak	Certified	3-Mar-11	
		Selaba Oil Mill	-		Certified		
		Seri Intan (+ Selaba) Estate	-		Certified		
		Sabrang Estate	-		Certified		
		Sogomana Estate	-		Certified		
		Sg. Wangi Estate	-		Certified		
		Bikam Estate	-		Certified		
		Cluny (+ Bedford) Estate	-		Certified		
6	Tennamaram	Tennamaram Oil Mill	-	Bestari Jaya, Selangor	Certified	3-Mar-11	
		Tennamaram Estate	-		Certified		
		Sungai Buluh Estate	-		Certified		
		Bukit Talang Estate	-		Certified		
7	Bkt Kerayong	Bukit Kerayong Oil Mill	-	Kapar, Selangor	Certified	15-Apr-11	
		Bukit Kerayong Estate	-		Certified		
		Bukit Cheraka Estate	-		Certified		
		Elmina Estate	-		Certified		
8	East	East Oil Mill	-	Carey Island, Selangor	Certified	19-May-10	
		East Estate	-		Certified		

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		Sepang Estate					
		Dusun Durian Estate	-		Certified		
9	West	West Oil Mill	-	Carey Island, Selangor	Certified	19-May-10	
		West Estate	-		Certified		
10	Bukit Puteri	Bukit Puteri Oil Mill	-	Raub, Pahang	Certified	7-Jul-11	
		Bukit Puteri Estate	-		Certified		
11	Kerdau	Kerdau Oil Mill	-	Temerloh, Pahang	Certified	7-Jul-11	
		Kerdau Estate	-		Certified		
		Jentar Estate	-		Certified		
		Mentakab Estate	-		Certified		
No	Management Unit SOU Name	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
		Chenor Estate	-		Certified		
		Sg Mai Estate	-		Certified		
12	Jabor	Jabor Oil Mill	-	Kuantan, Pahang	Certified	7-Jul-11	
		Jabor Estate	-		Certified		
13	Labu	Labu Oil Mill	-	Nilai, Negeri Sembilan	Certified	30-Dec-11	New Labu Estate has become a division of Labu Estate.
		Labu Estate	-		Certified		
14	Tanah Merah	Tanah Merah Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	19-May-10	
		Tanah Merah Estate	-		Certified		
		Bukit Pelandok Estate	-		Certified		
15	Sua Betong	Sua Betong Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	18-Feb-14	Siliao Estate has now been merged into Salak Estate and Bradwall Estate. Siliao Estate has now been merged into Salak Estate and Bradwall Estate.
		Sua Betong Estate	-		Certified		
		Sengkang Estate	-		Certified		

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		Bradwall Estate	-		Certified		
		PD Lukut Estate	-		Certified		
		Tampin Linggi Estate	-		Certified		
		Sg. Bahru Estate	-		Certified		
		Salak Estate	-		Certified		
16	Kok Foh	Kok Foh Oil Mill	-	Bahau, Negeri Sembilan	Certified	7-Jul-11	
		Muar River Estate	-		Certified		
		Sg. Senarut Estate	-		Certified		
		Sg. Gemas Estate	-		Certified		
		Kok Foh Estate	-		Certified		
		Bukit Pilah Estate	-		Certified		
		St. Helier Estate	-		Certified		
		Sungai Sabaling Estate	-		Certified		
		Pertang Estate	-		Certified		
17	Kempas	Kempas Oil Mill	-	Jasin, Melaka	Certified	19-May-10	
		Kempas Estate	-		Certified		
		Tangkah Estate	-		Certified		
		Kemuning Estate	-		Certified		

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

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

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

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

Legends

NA - NOT APPLICABLE

RSPO PUBLIC SUMMARY REPORT

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

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

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4	PT Langgeng Muaramakmur	Bebunga Mill	-		Kotabaru District – South Kalimantan	Certified	16-Mar-12	Previously KKPA Sg. Cengal. Sime Darby Plantation does not have management control over the plasma scheme.
		Bebunga Estate	-			Certified		
		Sungai Cengal Estate	-			Certified		
		Bakau Estate	-			Certified		
		KKPA LMR	2020			-		
5	PT Kridatama Lancar	Sukamandang Mill	-		Seruyan and East Kotawaringin District – Central Kalimantan	Certified	5-Jul-11	
		Sukamandang Estate	-			Certified		
		Sapiri Estate	-			Certified		
		Barasdanum Estate	-			Certified		
		Kuala Kuayan Estate	-			Certified		
6	PT Bahari Gembira Ria	Ladang Panjang Mill	-		Muaro Jambi District - Jambi	Certified	9-Jul-12	Only Division 3 (1200ha) was certified . Division 1 & 2 with 1792 Ha received HGU recently. The unit is getting ready for certification. Plan for certification in 2020. Total Ladang Panjang Estate is 2992 ha. Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR.
		Ladang Panjang Estate	-			Certified	9-Jul-12	
		Plasma BGR Estate	2020	Nov-19		-		

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7	PT Tunggal Mitra Plantations	Manggala Mill	-		Rokan Hilir District – Riau	Certified	25-Nov-10	-
		Manggala 1 Estate	-			Certified		
		Manggala 2 Estate	-			Certified		
		Manggala 3 Estate	-			Certified		
8	PT Paripurna Swakarsa	Pondok Labu Mill	-		Kotabaru District – South Kalimantan	Certified	16-Mar-12	
		Pondok Labu Estate	-			Certified		
		Binturung Estate	-			Certified		
		Rampa Estate	-			Certified		
		Sesulung Estate	-			Certified		
9	PT Bersama Sejahtera Sakti	Gunung Aru Mill	-		Kotabaru District – South Kalimantan	Certified	5-Jul-11	
		Gunung Aru Estate	-			Certified		
		Gunung Kemas Estate	-			Certified		
		Laut Timur Estate	-			Certified		
		Pantai Timur Estate	-			Certified		
		KKPA MBP	2020	Dec-19		-		The new project at KKPA Maju Bersama by the plasma community is currently in nursery stage and not yet due for harvesting, the year of planting was in 2014. Internal Audit for 2019 is planned in Dec 2019.
10	PT Guthrie Pecconina	Rantau Panjang Mill	-		Musi Banyuasin District – South Sumatera	Certified	16-Mar-12	Remarks: Land legalisation process for 4152.70 ha is still in process.
		Rantau Panjang Estate	-			Certified		
		Bumi Ayu Estate	-			Certified		
		Karang Ringin Estate	-			Certified		
		Napal Estate	-			Certified		
		Mangun Jaya Estate	-			Certified		
		Sungai Jernih Estate and GPI KKPA Estate	2020	Oct-19		-		Sungai Jernih Estate and the KKPA Estates(1-5) has undergone audit. Land legalisation process is still in process.

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

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

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					Kalimantan			Lembiru Mill.
		Lembiru Estate	-			Certified		
		Awatan Estate	-			Certified		
		Karya Palma Estate	2020	Jul-19		-		
		KKPA SNP Estate	2020	Jul-19		-		
22	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Estate	-		Ketapang District – West Kalimantan	Certified	3-Jul-19	Perijinan' process is ongoing Perijinan' process is ongoing Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing HGU obtained as per May 2018 Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing
		Sungai Putih (PT BAL) Estate	2020	May-19		-		
		Beturus (PT BAL) Estate	2020	May-19		-		
		KKPA BAL Estate	2020	May-19		-		
23	PT Mitral Austral Sejahtera	MAS Mill	NA	NA	Sanggau District – West Kalimantan	NA	NA	The properties was sold and currently SDP have no control in the management. Please find latest information on 'Updates on PT MAS' worksheet and updates to RSPO Secretariat.
		MAS 1 Estate	NA	NA		NA		
		MAS 2 Estate	NA	NA		NA		
		MAS 4 Estate	NA	NA		NA		
		Plasma MAS Estate	NA	NA		NA		

Legends

Properties was sold.

Mill closed
down/Mothballed

NA - NOT APPLICABLE

RSPO PUBLIC SUMMARY REPORT

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

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

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

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

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

SIME DARBY PLANTATION - RSPO Certification for Time Bound Plan - Liberia Operations

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
1	Sime Darby Plantation (Liberia) Grand Cape Mount	Grand Cape Mount Mill	Not Applicable - Property disposed	Grand Cape Mount County	Not yet Certified	NA	<p>As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI).</p> <p>http://www.simedarbyplantation.com/media/press-releases/sime-darbyplantation-completes-divestment-of-its-liberia-operations</p>
		Bomi Estate					
		Lofa Estate					
		Matambo Estate					
		Grand Cape Mount Estate					