



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

File Ref. : ES10171014

RSPO PUBLIC SUMMARY REPORT

CLIENT : SIME DARBY PLANTATION BERHAD – SOU 32 RAJAWALI

PARENT COMPANY : SIME DARBY PLANTATION BERHAD

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

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

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
Rajawali Certification Unit	Rajawali Palm Oil Mill	N3.37066	E113.4003	Kilang Kelapa Sawit Rajawali, KM52 Jalan Bintulu/Miri P.O Box 2324, 97011 Bintulu Sarawak.
	Rajawali Estate	N3.42595	E113.3792	Rajawali Estate, P. O. Box 673, 97011 Bintulu, Sarawak.
	Semarak Estate	N3.36305	E113.3825	Semarak Estate, P.O Box 2070, KM52, Jalan Bintulu-Miri, 97011 Bintulu, Sarawak.
	Samudera Estate	N3.56449	E113.3733	Samudera Estate, P. O. Box 2330, 97011 Bintulu, Sarawak.
	Bayu Estate	N3.48237	E113.3976	Bayu Estate, P.O. Box 2596, KM 65, Bintulu-Miri Road, 97011 Bintulu, Sarawak.

MAP : See Attachment 1

AUDIT DATE : 29th Nov. – 4th Dec. 2021

DURATION : 27 auditor days

TYPE OF AUDIT : Annual Surveillance Audit 4 – 2020

Recertification Audit – 2021

STANDARD: MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

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

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

(extended to 29/03/2022; provided under the provision in addressing the Covid-19 pandemic condition)

The following attachments form part of this report:

Non-conformity Report(s)

List of additional site(s)

Report by Audit Team Leader

Name : **DZULFIQAR BIN AZMI**

Signature :

Date : 8/03/2022 (Public Summary)
18/02/2022 (Final Report)

Acknowledgement by Client's Representative

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

Signature :

Date : 10/3/22

SALWA MD. YAZID
Manager - SQM
Sarawak Region

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SUMMARY OF AUDITS

Recertification Audit (Combined Audit with SA4)				
On-site audit date	: 29th Nov. – 4th Dec. 2021	No. of auditor days:	27 auditor days	
Audit team	: Dzulfiqar Azmi (LA), Rozaimée Abd. Rahman, Rohazimi Mat Nawi, Rahayu Zulkifli, Mohd Norddin Abd Jalil			
No. of major NCR	: 1	Indicator: 3.4.3	Closing date: 14/02/2022	
No. of minor NCR	: 3	Indicator: 2.1.2, 3.3.2, 3.7.2		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	X		X	
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	X		X	X
	Indigenous people	Contractor	Others (Please specify)	
	NA	X		
Supply base sampled	: Rajawali, Samudera, Semarak & Bayu Estates			
Changes since the last audit	: Changes in planted ha is due to reclamation of fallow area which are no longer consider as CSA area. GPS team had conducted GPS mapping to update more accurate area statement in the SEMUA Field Master Data. The field hectareage has been updated in SAP system in Dec 2020 after approved by Chief Executive Officer, Upstream Malaysia. Latest updated planted area is at 9,926.40 ha (previous reported as 9,790.52 ha).			
Justification of audit planning	: Allocation of mandays during onsite: 8-man days balanced from remote audit ASA 4 and 19-man days RA 2021 to covers 1 POM and 4 estates. Combined audit ASA4-2020 & RA-2021.			
Name of peer reviewer	: Prof. Emeritus Dr Jalani Sukaimi			
Report approved by	: Kamini Sooriamorthy	Approval date :	8/03/2022	

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

Annual Surveillance Audit 2				
On-site audit date	:	No. of auditor days :		
Audit team	:			
No. of major NCR	:	Indicator:	Closing date :	
No. of minor NCR	:	Indicator :		
Indicate by ticking the stakeholders interviewed	Employees / Workers	Settlers	Villagers / Local communities	Suppliers

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during the on-site audit	organizations			
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	Indigenous people	Contractor	Others (Please specify)	
Supply base sampled	:			
Changes since the last audit	:			
Justification of audit planning	:			
Report approved by	:		Approval date :	

Annual Surveillance Audit 3

On-site audit date	: 14-17 October 2019	No. of auditor days :	20.0 Auditor Days	
Audit team	: Mohd Zulfakar Kamaruzaman (Lead), Mohd Ab Raouf Asis, Rozaimiee Ab Rahman, Selvasingam T. Kandiah, Mohd Norddin Abd Jalil			
No. of major NCR	: 1	Indicator: 4.1.2 (Recurrence Minor)	Closing date : 8/01/2020	
No. of minor NCR	: -	Indicator : -		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities	Suppliers
	X		X	X
	Contract workers	NGOs	Govt. agency	Independent growers
	Indigenous people	Contractor	Others (Please specify)	
	X	X		
Supply base sampled	: Rajawali, Samudera, Semarak & Bayu Estates			
Changes since the last audit	: No change.			
Justification of audit planning	: Total allocation of audit man day for SOU Rajawali were: Rajawali POM = 4 auditor days (total workers 120, for safety and health, environment, mill best practices, GHG verification, etc with 1 day for supply chain certification systems) Rajawali, Samudera, Semarak & Bayu Estate = 4 auditor days for each estates (monitoring on critical areas such as buffer zone areas, boundary forest reserve, neighbouring villagers, stakeholder, etc. verified safety and health, environment, good agriculture best practices, GHG verification, etc)			
Report approved by	: Kamini Sooriamorthy		Approval date : 15/01/2020	

Annual Surveillance Audit 4 (Remote Audit)

On-site audit date	: 13-15 October 2020	No. of auditor days:	6 auditor days	
Audit team	: Rozaimiee Ab Rahman (LA), Razman Salim, Mohd Zulfakar Kamaruzzaman			
No. of major NCR	: Nil	Indicator: NA	Closing date: NA	
No. of minor NCR	: Nil	Indicator: NA		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities	Suppliers
	Contract workers	NGOs	Govt. agency	Independent growers
	Indigenous people	Contractors	Others (Please specify)	
Supply base sampled	: Rajawali, Samudera, Semarak & Bayu Estates			
Justification of audit planning	: Remote audit allocated 6 mandays for 4 estates and POM			
Changes since the last audit	: No changes			
Report approved by	: Kamini Sooriamorthy		Approval date: 21/12/2020	

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SUMMARY OF INFORMATION

TABLE 1

	RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Nov. 2021 – Oct. 2022			Oct. 2019 – Sep. 2020	**Oct. 2020 – Oct. 2021
Certified FFB Processed (MT)	154,266.11			149,242.00	144,901.96
Production of Certified CPO (MT)	34,049.07			35,469.00	31,227.06
Production of Certified PK (MT)	7,977.54			8,243.00	7,362.15
Certified Areas (Ha)	14,104.45			14,104.45	14,104.45
Planted Areas (Ha)	*9,926.40			9,790.52	*9,926.40
Production Areas (Ha)	8,155.76			7,198.83	8,155.76
HCV Areas / Conservation Areas (Ha)	275.40			275.40	275.40
REMARKS	*Changes in planted ha is due to reclamation of fallow area which are no longer consider as CSA area. GPS team had conducted GPS mapping to update more accurate area statement in the SEMUA Field Master Data. The field hectareage has been updated in SAP system in Dec 2020 upon approval by Chief Executive Officer, Upstream Malaysia. **Actual reporting period for this audit.				

TABLE 2

	PO	PK
Last years certified volume (MT) – ASA 3 & ASA 4	*73,490.30	*17,145.50
Last years actual certified sold (MT)	43,623.49	11,696.55
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	17,867.05	3,058.67
New year certified volume (MT) – RA	34,049.07	7,977.54

*Extensions of volumes were carried out in Jan & Dec 2021

CSPO = 35,469.00 + 17094.00+ 20927.30 = 73490.30 MT

CSPK = 8,243.00 + 3906.00 + 4996.50 = 17145.50 MT

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1.0 AUDIT PROCESS

1.1 Certification Body

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

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & ISO 45001. 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 2014).

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Dzulfiqar Azmi	Lead Auditor / Safety, Mill Best Practices, TPB, Legal	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He has experience in auditing since 2018. He is trained as an RSPO Lead Auditor.
Rozaimiee Ab Rahman	Auditor / Supply Chain, Social (External)	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.
Rohazimi Mat Nawi	Auditor / Environment, GHG	Hold B. Sc (Hons) Chemical_Gas Engineering from Universiti Teknologi Malaysia. He has been in the Plantations Industry with various company having served in Palm Oil Mill. He was qualified in the auditing line with experienced in Sustainability, QMS, EMS, OHSMS and Supply Chain audit since 2015.
Mohd Nordin Abdul Jalil	Auditor / Good Agriculture Practice	Holds B.Sc. Agriculture (weed management) and had more than 35 years of working experience in plantation management covering rubber and oil palm.
Rahayu Zulkifli	Auditor / Social (Internal) & HCV	Graduated with LLB (Hons), a practising lawyer, Head of Legal Dept. for several companies before working with an environmental NGO in 2003 and joined the RSPO in 2014. A freelance (since 2016), an expert in social aspect of the RSPO and a qualified auditor for RSPO P&C.

1.3 Audit methodology

The audit was conducted combined with Surveillance Audit 4 for year 2020 (balance 70% onsite audit) and Recertification Audit for year 2021. The audit covered the Rajawali POM and Rajawali Estate, Samudera Estate, Semarak Estate and Bayu Estate. The sampling conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

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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 20th October 2021. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs). The stakeholder consultation process is carried out during initial compliance and recertification audit only. So far, no negative feedback was received from stakeholders. 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>The following were confirmed during the conduct of audit as there was no evidence to prove otherwise:</p> <ul style="list-style-type: none"> ▪ All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in English/Bahasa as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer. ▪ They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime. ▪ They have been getting salaries above RM1,100 since January 2019. Salaries were paid before the 7th of every month. ▪ No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment. ▪ No discrimination between migrant workers and local workers, between male and female workers. ▪ Comfortable housing with water and electricity provided. ▪ Have access to affordable food from the canteen/sundry shops within the estate/mill premises. ▪ Entitled to free medical facilities at the estate clinic. ▪ Have representatives who attend regular meetings with the management where they can put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects. ▪ They knew the types of work offered at Rajawali CU (mill & estates) when they were in their countries of origin. ▪ All migrant workers keep their own passports. ▪ Shuttle services FOC once a month for workers go to nearest town. ▪ Monthly recognition for workers i.e. highest harvesting productivity and housing cleanness ▪ Alternate Sunday/Rest Work ▪ Complaint channel via various platform i.e. Suara Kami (Platform by Nestle), Impactt (Ulula), WMU Careline (From Region), Whistleblowing (HQ). ▪ Freedom Decision Movement by worker for medical access and leaving of workplace during rest or public holiday via implemented the Guideline Medical Access Procedure & Guideline of Leaving of Workplace.

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2) Settlers	Not available for this audit.
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> ▪ As for this Audit, the audit team interviewed with local communities and confirmed that there was no new land claim made by the Indigenous people since Sime Darby released the disputed land in 2012. ▪ Occasionally are called to attend meetings by Rajawali CU. The last one was held few months ago. ▪ All stakeholders were Invited to attend RSPO/MSPO briefings and stakeholder meetings. ▪ Rajawali CU is operating harmoniously with surrounding oil palm smallholdings. ▪ No issue about pollution. ▪ Some workers who work at Rajawali CU come from neighbouring places around the mill/estates.
4) Suppliers	<ul style="list-style-type: none"> ▪ Suppliers of hardware and FFB transporters since 1997. ▪ Rajawali CU and supplier contract were signed by both parties. Suppliers would be contacted to supply hardware items as and when the need arises. FFB transporter's service was needed when required. This happens approximately once in two months for suppliers but daily for transporters. ▪ Fair dealings with the units in Rajawali CU. ▪ Payments are made within 1 months of invoice.
5) Contract workers	<ul style="list-style-type: none"> ▪ Contract workers mainly for FFB Drivers. There is one issue highlighted during the audit. NCR was raised under indicator 2.1.2 regarding late salary payment to workers.
6) Local & national NGOs	<ul style="list-style-type: none"> ▪ No issues.
7) Government agencies / Statutory bodies	<ul style="list-style-type: none"> ▪ Harmonious co-existence with relevant stakeholders. ▪ Document review showed officers of the relevant Government agencies especially the Jabatan Tenaga Kerja Bintulu had good working relationship with Rajawali CU. ▪ Government agencies also confirmed no offenses incurred by Rajawali CU.
8) Independent growers / Smallholders	<ul style="list-style-type: none"> ▪ No issues.
9) Indigenous people	<ul style="list-style-type: none"> ▪ As for this Audit, the audit team interviewed with local communities and confirmed that there was no new land claim made by the Indigenous people since Sime Darby released the disputed land in 2012.
10) Contractor	<ul style="list-style-type: none"> • All Contractors had provided services to Rajawali CU mill/estates for the past 4-5 years. Each signed a contract and understands contractual obligations and the need to comply with legal requirements. ▪ Fair dealings with the units in Rajawali CU. ▪ Payments are made within 1 months of invoice. ▪ For transporter contractor, the estate mandore and staff will verify the work the contractor has done before his invoice can be approved for payment. ▪ All contractors' workers had attended MSPO training, signed COBC commitment statement and safety. briefing. The Company provides PPE (vest, goggles, straw hat) ▪ Suppliers of hardware and spare parts invoices were based on agreed quoted prices. ▪ Payment to contractors were made usually within 45 days of invoice. Renewal of contract is via tender system.

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	<ul style="list-style-type: none"> ▪ Contractor and his workers knew about the minimum wages order requirement the workers make statutory contributions such as EPF and SOSCO. Workers details including names, pay slips, were presented for verification. ▪ Contractor removes domestic waste from workers' quarters, provide recycling services. Signs annual contract. Terms and conditions are clear and fair. Payments are received within one month. ▪ All contractors also attended stakeholder meetings. ▪ Contractors must provide to the estate's copies of their worker details and payslips.
11) Previous land owner (if any)	<ul style="list-style-type: none"> ▪ It has been verified that the land belonged to Austral Enterprise Bhd. The land was bought by Golden Hope Plantation Sdn Bhd before the merge with Sime Darby in year of 2008. The audit team had confirmed that there were no land issues related to previous owners. No land was encumbered by customary rights or dispute from any stakeholder at Rajawali CU.
12) Others (please specify)	<ul style="list-style-type: none"> ▪ Sundry shop informed that he allows workers to buy goods either in cash or on credit. Previously there were cases where workers absconded and left the estate/mill without paying their debts. But this is becoming less and less.
1.5 Audit plan : Refer to Attachment 2	
1.6 Date of next audit : The next surveillance audit will be conducted within 12 months but not sooner than 9 months from this audit. (For RA, the next RA will be conducted at least 4 months prior to expiry date of the certificate)	

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2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Rajawali Certification Unit (CU) is one of the Strategic Operating Unit (SOU) of Sime Darby Plantation Berhad. (SDP). The CU is also known as SOU 32 and consisted of Rajawali Palm Oil Mill (RPOM), Rajawali Estate, Samudera Estate, Semarak Estate and Bayu Estate. The CU is located about 100km from Bintulu town and is accessible via the Bintulu-Miri Road.

Rajawali POM commenced its operations in 1993 with a processing capacity of 60 metric tonnes of FFB per hour. The total combined land area of the four estates is 14,104.45 hectares (Ha) of which 9,926.40 Ha had been planted with oil palm.

The Rajawali POM also holds the certificate for MSPO and MSPO SC.

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

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

Table 1: Actual FFB production by the supply base for the period from October 2019 to September 2020 & October 2020 to October 2021

Supply Based	FFB Production (Oct. 2019 to Sep. 2020)		FFB Production (Oct. 2020 to Oct. 2021)		Certifying CB
	Total Mt	Percentage (%)	Total Mt	Percentage (%)	
Rajawali Estate	40,872.51	28.13	37,686.58	26.02	SIRIM
Semarak Estate	29,580.89	20.35	31,908.75	22.03	SIRIM
Samudera Estate	35,347.53	24.32	35,336.42	24.40	SIRIM
Bayu Estate	33,994.07	23.40	36,904.01	25.47	SIRIM
SDPB Sister Estates					
Damai Estate	2,552.39	1.75	1,534.86	1.06	SIRIM
Sahua Estate	2,950.33	2.05	1,219.62	0.84	SIRIM
Derawan Estate	0.00	0.00	122.28	0.08	SIRIM
Takau Estate	0.00	0.00	145.57	0.10	SIRIM
Grand Total	145,297.72	100.00	144,858.09	100.00	

Table 2: Projected FFB production by the supply base for the next reporting period November 2021 to October 2022

Supply Based	FFB Contribution		Certifying CB
	Total Mt	Percentage (%)	
Rajawali Estate	44,217.09	28.66	SIRIM
Semarak Estate	31,365.44	20.33	SIRIM
Samudera Estate	41,902.86	27.16	SIRIM
Bayu Estate	36,780.72	23.84	SIRIM
Grand Total	154,266.11	100.00	

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Table 3: Actual FFB received and CPO & PK dispatch by Rajawali POM for period from October 2019 to September 2020 & October 2020 to October 2021

RSPO Supply Chain Model: Identity Preserved	Oct. 2019 to Sep. 2020 (ASA3)	Oct. 2020 to Oct. 2021 (ASA4)	Total (MT)
FFB Received	145,297.72	144,858.09	290,155.81
FFB Processed	145,297.72	144,858.09	290,155.81
Certified FFB Processed	145,297.72	144,858.09	290,155.81
Crude Palm Oil (CPO)			
Certified CPO Production	30,263.49	31,227.05	61,490.54
Certified CPO delivered as RSPO	30,263.49	13,360.00	43,623.49
Certified CPO delivered as non-RSPO	0.00	17,867.05	17,867.05
Certified CPO delivered under other sustainable schemes	0.00	0.00	0.00
Palm Kernel (PK)			
Certified PK Production	7,522.26	7,362.15	14,884.41
Certified PK delivered as RSPO	7,522.26	4,174.29	11,696.55
Certified PK delivered as non-RSPO	0.00	3,058.67	3,058.67
Certified CPO delivered under other sustainable schemes	0.00	0.00	0.00
Credit traded under Book & Claim	0.00	0.00	0.00

Table 4: Projected FFB received and CPO & PK dispatch by Rajawali POM of next reporting period November 2021 to October 2022

RSPO Supply Chain Model: Identity Preserved	Total (MT)
FFB Received	154,266.11
FFB Processed	154,266.11
Certified CPO Production	34,049.07
Certified PK Production	7,977.54

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Rajawali Estate	3,275.04	6,087.27
Semarak Estate	2,280.99	2,248.68
Samudera Estate	2,233.11	3,308.60
Bayu Estate	2,137.26	2,459.90
Total	9,926.40	14,104.45

Table 6: Planting profile for Rajawali CU

Estate	Year of planting	Planting Cycle	Mature >3 years (Ha)	Immature < 3 years(Ha)	Planted area	% of planted area mature	% of planted area immature
Rajawali Estate	1996	1st	801.57	0.00	801.57		
	1997	1st	133.62	0.00	133.62		
	2000	1st	64.12	0.00	64.12		
	2002	1st	38.22	0.00	38.22		
	2003	1st	41.04	0.00	41.04		
	2004	1st	46.47	0.00	46.47		
	2013	2nd	214.40	0.00	214.40		

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	2014	2nd	210.10	0.00	210.10		
	2015	2nd	275.52	0.00	275.52		
	2016	2nd	185.52	0.00	185.52		
	2017	2nd	229.68	0.00	229.68		
	2018	2nd	324.15	0.00	324.15		
	2019	2nd	0.00	52.41	52.41		
	2020	2nd	0.00	311.87	311.87		
	2021	2nd	0.00	346.62	346.62		
	Total		2,564.14	710.90	3,275.04	78.29	21.71
Semarak Estate	1993	1st	165.02	0.00	165.02		
	1994	1st	511.75	0.00	511.75		
	1995	1st	192.91	0.00	192.91		
	1996	1st	157.98	0.00	157.98		
	2004	1st	95.05	0.00	95.05		
	2016	2nd	369.37	0.00	369.37		
	2017	2nd	183.54	0.00	183.54		
	2018	2nd	111.00	192.05	303.05		
	2019	2nd	0.00	58.59	58.59		
	2020	2nd	0.00	50.35	50.35		
	2021	2nd	0.00	193.38	193.38		
	Total		1,786.62	494.37	2,280.99	78.33	21.67
Samudera Estate	1998	1st	478.82	0.00	478.82		
	1999	1st	219.07	0.00	219.07		
	2000	1st	841.65	0.00	841.65		
	2016	2nd	261.56	0.00	261.56		
	2017	2nd	108.55	0.00	108.55		
	2018	2nd	199.89	0.00	199.89		
	2020	2nd	0.00	123.57	123.57		
	Total		2,109.54	123.57	2,233.11	80.66	19.34
Bayu Estate	1999	1st	157.03	0.00	157.03		
	2000	1st	1,060.65	0.00	1,060.65		
	2006	2nd	10.23	0.00	10.23		
	2008	2nd	5.61	0.00	5.61		
	2010	2nd	15.23	0.00	15.23		
	2017	2nd	236.25	0.00	236.25		
	2018	2nd	210.46	0.00	210.46		
	2019	2nd	0.00	74.49	74.49		
	2020	2nd	0.00	211.44	211.44		
	2021	2nd	0.00	155.87	155.87		
	Total		1,695.46	441.8	2,137.26	79.33	20.67
Sub Total			8,155.76	1,770.64	9,926.40	82.16	17.84

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as shown below:

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

RSPO PUBLIC SUMMARY REPORT

3.0 AUDIT FINDINGS

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

Changes in planted ha is due to reclamation of fallow area which are no longer consider as CSA area. GPS team had conducted GPS mapping to update more accurate area statement in the SEMUA Field Master Data. The field hectarage has been updated in SAP system in Dec 2020 after approved by Chief Executive Officer, Upstream Malaysia. Previous planted ha @ 9,790.52 ha. The updated value is at 9,926.40 ha.

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 certified? 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 P&C and RISS, Nov 2020 in this report.

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

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

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

If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification?

Yes No

If no, please state reasons NA

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

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

No changes so far.

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 negative feedback or comment was received during onsite audit.

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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) List : 3 2.1.2, 3.3.2, 3.7.2
(details refer to Attachment 4)

Total no. of major NCR(s) List : 1 3.4.3
(details refer to Attachment 4)

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

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

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

5.0 AUDIT CONCLUSION

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

6.0 RECOMMENDATION

- No NCR recorded. Recommended to continue certification.
- Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.
Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs .
- Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.
- Recommended to continue certification.
- Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.
Note: Major NCRs which are not addressed within a further 60 days shall result in the certificate being withdrawn.

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

Audit Team Leader :

DZULFIQAR AZMI

(Name)



(Signature)

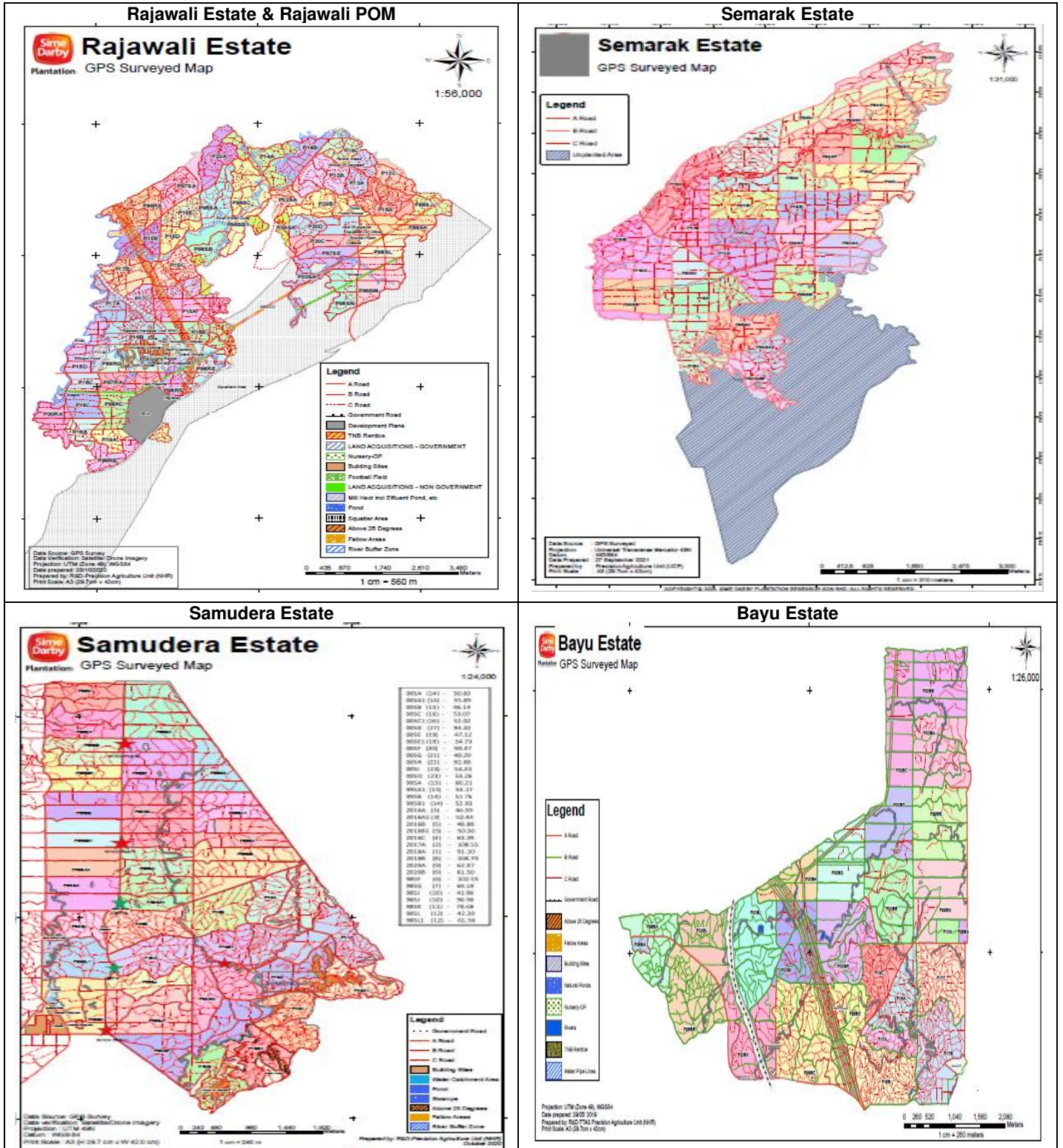
14 / 02 / 2022

(Date)

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Attachment 1 – Map

Map of Rajawali CU



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Attachment 2 – Audit Plan

RSPO MYNI 2019 Surveillance 4 and Recertification Audit Plan

1. Objectives

The objectives of the audit are as follows:

- (i) To determine Certification Unit conformance against the relevant certification standards.
- (ii) To verify the effective implementation of corrective actions arising from the findings of last audit.
- (iii) To make appropriate recommendations based on the audit findings.

2. Date of assessment : 29th November to 4th December 2021

3. Site of assessment : Rajawali CU
1. Rajawali Palm Oil Mill
2. Rajawali Estate
3. Samudera Estate
4. Semarak Estate
5. Bayu Estate

4. Reference Standard:

- a. MYNI 2019 of RSPO P&C 2018 / RSPO Independent Smallholder Standard, Nov 2019 / RSPO Management System Requirements and Guidance for Group Certification of FFB Production, March 2018
- b. RSPO Certification System Documents
- c. Company's audit criteria including Company's Manual/Procedures

5. Assessment Team

Lead Auditor : Dzulfiqar Azmi (GAP, Safety, Environmental)
Auditor : Rozaimée Abd. Rahman (SCCS, Social - External)
Rohazimi Mat Nawi (Environmental)
Rahayu Zulkifli (Social – Internal, HCV)
Mohd Norddin Abd Jalil (GAP)

Observer : N.A.

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 or field checks including observation of practices, interviews with internal and external stakeholders and interested parties (employees, nearby population, etc.), documentation review 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.

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

10. Working Language : English and Bahasa Malaysia
11. Reporting
 - a) Language : English
 - b) Format : Verbal and written
 - c) Expected date of issue : 2 weeks after the closure of the Major NC / or if only minor NC, 30 days from the last day of this audit.
12. Facilities Required
 - a. Room for discussion
 - b. Relevant document and record
 - c. Personnel protective equipment if required
 - d. Photocopy facilities
 - e. A guide for each group
13. RSPO 2018 Principles and Criteria (P&C) Metrics Template

The RSPO 2018 Principles and Criteria (P&C) Metrics Template outlines a set of strategic outcome-based metrics relating directly to the RSPO P&C and is aligned with the RSPO Theory of Change. This Metrics Template comes into effect on 1 June 2021 and all audits against the 2018 P&C or the relevant National Interpretation conducted from 1 June 2021 onwards shall prepare and submit this Metrics Template for the audit team to review during audit.

Please submit the Metrics Template to Lead Auditor according to this period:

 - a) Reporting time frames for economic data are:
 - i. Calendar year (January to December): January 2020 to December 2020, and
 - ii. 12-month period counting up to two months before audit month: Nov. 2020 to Oct. 2021
 - b) Reporting time frames for demographic data:
 - i. For mill and estate workers: as of 31 December 2020
 - ii. For smallholders and outgrowers: January 2020 to December 2020
 - c) Reporting time frame for all other social and environmental data:
 - i. January 2020 to December 2020

The updated Metrics Template (as attached, the version 2.0) will be enforced from 1 August 2021. All audits conducted from 1 August 2021 onwards must use the updated Metrics Template (version 2.0).
14. Assessment Programme Details : As below

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DETAILS OF AUDIT PLAN

Day One: 29/11/2021 (Monday)

Time	Activities / areas to be visited				Auditee
9.00 am	Opening Meeting for Sime Darby Plantation Berhad – Sou 32 Rajawali . Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.				All CU
9.20 am	Briefing on the organization background and implementation of RSPO at CU (including actions taken to address previous audit findings) by company Management Representative.				Management Representative
9.30 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Rajawali POM				Management Representative
9.45 am	To assign each audit team members – site and the P&C requirements				
	Dzul	Rozaimiee	Rohazimi	Rahayu	Hj. Norddin
	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders ▪ Local sustainable development ▪ Support smallholder inclusion ▪ Complaints and grievances ▪ Mill Boundary, adjacent and neighbouring land use ▪ Continuous improvement <p>Other area identified during the assessment</p>	Site visit and assessment on Supply Chain Implementation including the: <ul style="list-style-type: none"> ▪ Model used ▪ General Chain of Custody ▪ System Requirements for the supply chain ▪ Documented procedures ▪ Purchasing and goods in ▪ Outsourcing activity ▪ Sales and goods out ▪ Processing ▪ Records keeping ▪ Registration ▪ Training ▪ Claims 	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of mill management ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ River system and Effluent Treatment/Discharge ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ Continuous improvement <p>Other area identified during the assessment</p>	Coverage of assessment: P1, P2, P4, P5, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union representatives ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Workers Issues ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop & etc) ▪ Continuous improvement <p>Other area identified during the assessment</p>	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Chemical/ fertilizer store, workshop ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ Training and skill development programs ▪ Mill Best Practice ▪ Continuous improvement <p>Other area identified during the assessment</p>
12.30 pm	LUNCH BREAK & ZUHUR PRAYER				
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records				

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5.00 pm	Audit team discussion / Interim closing / End of Day 1 audit
9.00pm	Discussion LA and teams on potential NCRs

Day Two: 30/11/2021 (Tuesday)

Time	Activities / areas to be visited	Auditee									
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Bayu Estate	Management Representative									
9.15 am	To assign each audit team members – site and the P&C requirements										
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Dzul</th> <th style="width: 20%;">Rozaimée</th> <th style="width: 20%;">Rohazimi</th> <th style="width: 20%;">Rahayu</th> <th style="width: 20%;">Hj. Norddin</th> </tr> </thead> <tbody> <tr> <td> Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Chemical/ fertilizer store, workshop ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ River system and Riparian ▪ Training and skill development programs ▪ Continuous improvement Other area identified during the assessment </td> <td> Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders ▪ Local sustainable development ▪ Support smallholder inclusion ▪ Complaints and grievances ▪ Estate Boundary, adjacent and neighbouring land use ▪ Continuous improvement Other area identified during the assessment </td> <td> Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of mill management ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ Continuous improvement Other area identified during the assessment </td> <td> Coverage of assessment: P1, P2, P4, P5, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union representatives, gender committee, worker representative, contractors, supplier, etc. ▪ Workers Issues ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, Humana, Chreche, provision shop & etc.) ▪ Continuous improvement Other area identified during the assessment </td> <td> Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Commitment to long-term economic and financial viability ▪ Good Agricultural Practice-witness activities at site (weeding/ spraying, etc) ▪ EFB mulching, POME application ▪ Nursery (if any) ▪ Plantation on hilly/swampy area ▪ IPM implementation, training and safe use of agro-chemicals. ▪ Training and skill development programs ▪ New planting ▪ Continuous improvement Other area identified during the assessment </td> </tr> </tbody> </table>	Dzul	Rozaimée	Rohazimi	Rahayu	Hj. Norddin	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Chemical/ fertilizer store, workshop ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ River system and Riparian ▪ Training and skill development programs ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders ▪ Local sustainable development ▪ Support smallholder inclusion ▪ Complaints and grievances ▪ Estate Boundary, adjacent and neighbouring land use ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of mill management ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P4, P5, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union representatives, gender committee, worker representative, contractors, supplier, etc. ▪ Workers Issues ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, Humana, Chreche, provision shop & etc.) ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Commitment to long-term economic and financial viability ▪ Good Agricultural Practice-witness activities at site (weeding/ spraying, etc) ▪ EFB mulching, POME application ▪ Nursery (if any) ▪ Plantation on hilly/swampy area ▪ IPM implementation, training and safe use of agro-chemicals. ▪ Training and skill development programs ▪ New planting ▪ Continuous improvement Other area identified during the assessment
Dzul	Rozaimée	Rohazimi	Rahayu	Hj. Norddin							
Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Chemical/ fertilizer store, workshop ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ River system and Riparian ▪ Training and skill development programs ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders ▪ Local sustainable development ▪ Support smallholder inclusion ▪ Complaints and grievances ▪ Estate Boundary, adjacent and neighbouring land use ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of mill management ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P4, P5, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union representatives, gender committee, worker representative, contractors, supplier, etc. ▪ Workers Issues ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, Humana, Chreche, provision shop & etc.) ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Commitment to long-term economic and financial viability ▪ Good Agricultural Practice-witness activities at site (weeding/ spraying, etc) ▪ EFB mulching, POME application ▪ Nursery (if any) ▪ Plantation on hilly/swampy area ▪ IPM implementation, training and safe use of agro-chemicals. ▪ Training and skill development programs ▪ New planting ▪ Continuous improvement Other area identified during the assessment							
12.30 pm	LUNCH BREAK & ZUHUR PRAYER										
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records										
5.00 pm	Audit team discussion / Interim closing / End of Day 2 audit										
9.00pm	Discussion LA and teams on potential NCRs										

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Day Three: 01/12/2021 (Wednesday)

Time	Activities / areas to be visited					Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Samudera Estate					Management Representative
9.15 am	To assign each audit team members – site and the P&C requirements					
	Dzul	Rozaimie	Rohazimi	Rahayu	Hj. Norddin	
	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Chemical/ fertilizer store, workshop ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ River system and Riparian ▪ Training and skill development programs ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders ▪ Local sustainable development ▪ Support smallholder inclusion ▪ Complaints and grievances ▪ Estate Boundary, adjacent and neighbouring land use ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of mill management ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P4, P5, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union representatives, gender committee, worker representative, contractors, supplier, etc. ▪ Workers Issues ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, Humana, Chreche, provision shop & etc.) ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Commitment to long-term economic and financial viability ▪ Good Agricultural Practice-witness activities at site (weeding/ spraying, etc) ▪ EFB mulching, POME application ▪ Nursery (if any) ▪ Plantation on hilly/swampy area ▪ IPM implementation, training and safe use of agro-chemicals. ▪ Training and skill development programs ▪ New planting ▪ Continuous improvement Other area identified during the assessment	
12.30 pm	LUNCH BREAK & ZUHUR PRAYER					
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records					
5.00 pm	Audit team discussion / Interim closing / End of Day 3 audit					
9.00pm	Discussion LA and teams on potential NCRs					

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Day Four: 02/12/2021 (Thursday)

Time	Activities / areas to be visited					Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Semarak Estate					Management Representative
9.15 am	To assign each audit team members – site and the P&C requirements					
	Dzul	Rozaimie	Rohazimi	Rahayu	Hj. Norddin	
	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Chemical/ fertilizer store, workshop ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ River system and Riparian ▪ Training and skill development programs ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders ▪ Local sustainable development ▪ Support smallholder inclusion ▪ Complaints and grievances ▪ Estate Boundary, adjacent and neighbouring land use ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of mill management ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P4, P5, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union representatives, gender committee, worker representative, contractors, supplier, etc. ▪ Workers Issues ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, Humana, Chreche, provision shop & etc.) ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Commitment to long-term economic and financial viability ▪ Good Agricultural Practice-witness activities at site (weeding/ spraying, etc) ▪ EFB mulching, POME application ▪ Nursery (if any) ▪ Plantation on hilly/swampy area ▪ IPM implementation, training and safe use of agro-chemicals. ▪ Training and skill development programs ▪ New planting ▪ Continuous improvement Other area identified during the assessment	
12.30 pm	LUNCH BREAK & ZUHUR PRAYER					
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records					
5.00 pm	Audit team discussion / Interim closing / End of Day 3 audit					
9.00pm	Discussion LA and teams on potential NCRs					

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Day Five: 03/12/2021 (Friday)

Time	Activities / areas to be visited					Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Rajawali Estate					Management Representative
9.15 am	To assign each audit team members – site and the P&C requirements					
	Dzul	Rozaimée	Rohazimi	Rahayu	Hj. Norddin	
	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Chemical/ fertilizer store, workshop ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ River system and Riparian ▪ Training and skill development programs ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders ▪ Local sustainable development ▪ Support smallholder inclusion ▪ Complaints and grievances ▪ Estate Boundary, adjacent and neighbouring land use ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of mill management ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P4, P5, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union representatives, gender committee, worker representative, contractors, supplier, etc. ▪ Workers Issues ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, Humana, Chreche, provision shop & etc.) ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Commitment to long-term economic and financial viability ▪ Good Agricultural Practice-witness activities at site (weeding/ spraying, etc) ▪ EFB mulching, POME application ▪ Nursery (if any) ▪ Plantation on hilly/swampy area ▪ IPM implementation, training and safe use of agro-chemicals. ▪ Training and skill development programs ▪ New planting ▪ Continuous improvement Other area identified during the assessment	
12.00 pm	LUNCH BREAK & FRIDAY PRAYER					
2.00 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records					
5.00 pm	Audit team discussion / Interim closing / End of Day 5 audit					
9.00pm	Discussion LA and teams on potential NCRs					

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Day Six: 04/12/2021 (Saturday)

Time	Activities / areas to be visited				Auditee
9.00 am	To assign each audit team members – site and the P&C requirements				
	Dzul	Rozaimiee	Rohazimi	Rahayu	Hj. Norddin
	Coverage of assessment: P1, P2, P3, P6, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	Coverage of assessment: P1, P2, P3, P6, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	Coverage of assessment: P1, P2, P3, P6, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	Coverage of assessment: P1, P2, P4, P5, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	Coverage of assessment: P1, P2, P3, P6, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records
12.30 pm	LUNCH BREAK & ZUHUR PRAYER				
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records				
3.00 pm	Verification on outstanding issues for CU Auditor to inform auditee on the required document / records Continue Audit Team discussion and preparation of assessment findings.				
3.30 pm	Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager				
4.00 pm	Closing meeting at the CU / End of audit				

Note: This audit plan is subject to change whenever necessary, and the Client's representative will be informed of any

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Attachment 3

RSPO P&C AUDIT CHECKLIST AND FINDINGS (MYNI 2019 FOR RSPO P&C 2018)

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	SOU 32 Rajawali CU continued to use the internet to disseminate public information relating to company policies, land titles, human rights, FPIC, safety and health plans, pollution prevention plans and the procedure for complaints and grievances. The SDPB website address is http://www.simedarbyplantation.com/ . For social programmes on education, environment, community and health, etc, Yayasan Sime Darby as the Foundation has expanded its wings from offering scholarships to outstanding and deserving individuals to funding impactful conservation, outreach and development programmes. The SDPB website address http://www.yayasansimedarby.com/ .
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	Rajawali CU has conducted meeting with the stakeholder to share any new information on RSPO certification, environmental, social, safety and legal requirement applied to all operating units. All the stakeholders have raised some issue and discussed with the management during the meeting, carried out with external and internal stakeholders i.e. government agencies, school, villagers and private sectors (contractors and neighboring estates). The SDPB website address is http://www.simedarbyplantation.com/ .
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	The Rajawali CU continued to maintain the records of requests for information and responses are maintained which included the government agencies/ regulatory bodies, local communities. Management documents relating to environment, social and legal issues, were available to the public except for those prevented by commercial confidential or where disclosure of information would result in negative environmental or social outcomes. The CU has provided relevant information (environmental, social and/or legal) as requested by the relevant stakeholder during the annual stakeholder meeting.
	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, entitled "Procedure for External Communications". A review of the records kept in the internal and external communication files found that the operating units at Rajawali SOU followed the procedures and manuals developed by the company.

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Clause	Indicators	Comply Yes/No	Findings
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	Stakeholder list FY 2021 was established in both mill and estate. Stakeholder such as local communities, authorities, contractors, suppliers, FFB suppliers and NGOs were included in the list. Nominated representative with contact number and address was sighted.
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	The Rajawali certification unit is subjected to Sime Darby Plantations Sdn Bhd's Code of Business Conduct (COBC). The contracts between Sime Darby Plantation Berhad and its recruitment agents in Indonesia also contain a clause which requires the recruitment agents to abide by Sime Darby's COBC.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	The Vendor COBC applies to all its suppliers, consultants, agents, contractors /service providers who have direct dealings with the Group. All vendors are required to declare their compliance through the Sime Darby Berhad Vendor Integrity Pledge which includes a declaration to eradicate all forms of exploitation, including but not limited to modern day slavery and human trafficking.

Principle 2: Operate legally and respect rights

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

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	YES	Generally, Rajawali CU complied with applicable legal requirements.
	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.	NO	The Rajawali CU was tracking any changes to applicable law and had Sime Darby Sustainability Compliance as the person responsible to monitor any changes to the law and to cascade those changes to all sites. Latest review was done on 23/06/2021. However, a documented system for ensuring legal compliance was not in place: (i) Refer to Occupational Safety and Health (Noise Exposure) Regulations 2019 Section 4 (1). This regulation gazette on 01/03/2019 and come into operation on 01/06/2019. The Noise Risk Assessment yet to be carried out for all estates until the audit process. The estates management only managed to get the quotation from Global Green OSH Services Sdn. Bhd. dated 27/10/2021. (ii) Sarawak Labour Ordinance (Chap 76) section 109 payment of wages. At Bayu Estates – Based on verification of pay slips October 21, September 21, August 21 and interview with contractor workers (KSG Enterprise) was informed they received the salary later than 7 days after the expiration of the wage period. <i>Therefore, Minor NCR DA 01 2021 was raised.</i>
	2.1.3 Legal or authorised boundaries are	YES	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there

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Clause	Indicators	Comply Yes/No	Findings
	clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.		is no planting beyond these legal or authorised boundaries.
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 stakeholder lists for all the units, namely Rajawali POM, Rajawali, Semarak, Bayu and Samudera Estates, were all available and sighted during the audit.
	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	Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, were clearly stated in contract between Sime Darby and all interviewed contractors.
	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	Contractors also sign the Vendor Integrity Pledge in which Vendors undertake to comply with the Vendor COBC. The Vendor COBC in turn, contains provisions which state that Vendors shall not employ anyone under the age of 18 or the applicable minimum legal age in the countries they operate, unless in vocational and/ or formal and structured apprenticeship, educational and training programmes.
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 • One or more supporting documents for claims • Valid MPOB license 	YES	Rajawali Palm Oil Mill is an Identity Preserved Mill and therefore only receives and processes FFB from its own internal sources namely Bayu Estate, Samudera Estate, Rajawali Estate and other SD group of estates. No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.
	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	Rajawali Palm Oil Mill is an Identity Preserved Mill and therefore only receives and processes FFB from its own internal sources. These Estates have its own MPOB licenses and information of geo-locations of FFB origins. Therefore, Rajawali Palm Oil Mill does not process any FFB from any collection centers, agents or intermediaries.

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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 business plan for the mill is reflected in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilisation rate and CAPEX. The business or management plan for the estate was presented in the form of annual budget with 5 years projection (2021 – 2025). The annual budget contains the crop projection and the finance allocation for field operation and administrations. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	(Remote & Onsite) Rajawali CU have established a long-range replanting programmed until FY 2026. Replanting is planned for the fields older than 25 years, non-performance field (yields), Ganoderma infection.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	Management review has been planned to conduct yearly basis. Sighted latest management review meeting has been conducted (combine RSPO and MSPO) to discuss issues related to audit findings, estate and mill operations. Among the management review were discussed are: <ol style="list-style-type: none"> 1. Results of internal audits 2. Customer (internal/external) feedback 3. Process performance and product conformity 4. Status of preventive and corrective actions 5. Follow-up actions from management reviews 6. Changes that could affect the management system 7. Recommendations for improvement Management has transparently addressed the continuous suitability, adequacy, and effectiveness of the requirements for effective implementation of RSPO.
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow	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	Action Plan for continuous improvement can be seen from efforts carried out by Sime Darby Plantation to enhance workers' rights and welfare, and covering also the environment and opportunities at the CU.
	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.	YES	The auditor checked the data in the RSPO Metric Templates and figure given was tally with their database system.

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Clause	Indicators	Comply Yes/No	Findings
demonstrable continuous improvement in key operations.			
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	Rajawali CU adopted the following manuals / guidelines for the day-to day operations of the estates and mill. It includes the operation activities in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Both the estate and mill operations are guided through the manuals and SOPs. The procedures as documented in the Agriculture Reference Manual were disseminated to the staff/workers through morning briefings and trainings. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. Field inspection and interviews with the workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs. The SOPs included the operation activities in the estates and the mills from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and dispatch of CPO & PK and security in the Certification Unit.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	NO	Sime Darby has established a system to monitor the mill and estate operation. The Structured Oil Recovery Assessment (SORA) (for Mill) / Structured Crop Recovery Assessment (SCRA) (for estates) and Planning and Monitoring Unit visited the operating units quarterly. Their reports cover on all aspect of operation. In addition, visit by agronomist was made yearly. The report focusing on rainfall, yield [performing and underperforming], palm nutrition status, field observation agronomic matters and fertilizer recommendation has been included in the report. All the reports of monitoring were available at estate and mill office for references. Plantation Advisory Department, Performance Monitoring Unit, Quality Management Unit (PSQM) inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Third party visit/inspection was also done as part legal compliance monitoring. During the audit, random interviews with the estate workers revealed that they understood the requirements stated in the SOPs. For example, it was observed that harvesting standards and pesticides usage had been properly understood by the estate harvesters and sprayers respectively. However, during this audit, the mechanism to check consistent implementation of procedure Personal Protective Equipment (PPE) UM/HSE/OCP/03 2021 was not in place. Site inspection at Nursery of Bayu Estate, it was found out that 5 out of 7 Nursery Workers were not wearing straw hats as procedure. <i>Thus, Minor NCR MN 01 2021 was raised.</i>
	3.3.3 Records of monitoring and any actions taken are maintained and	YES	Plantation Advisory Department, Performance Monitoring Unit, Quality Management Unit (PSQM) inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Third party

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Clause	Indicators	Comply Yes/No	Findings
	available.		visit/inspection was also done as part legal compliance monitoring.
3.4 A comprehensive Social and Environmental 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.	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	YES	There are no new plantings or new operations within Rajawali CU. Nevertheless, each unit has its own EIA and SIA done which have been prepared internally by the Sustainability Department. Details of the EIA and SIA are contained in Indicator 3.4.2 below.
	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) was conducted for SOU 32 Rajawali Operating Units comprising Rajawali POM, Rajawali Estate, Samudera Estate, Bayu Estate and Semarak Estate were done between 5 - 9 Sept 2016 in collaboration with the Sustainability Dept of Plantation Sustainability Quality Management. The SIA was developed with the participation of external and internal stakeholders namely workers representatives, community leaders, workers, related govt agencies, staff, contractors, suppliers. The organization had maintained their Environmental Aspects with latest review carried out between April to Aug 2021.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	NO	The reviews considered issues raised by its internal and external stakeholders. Nevertheless, it was found during the audit that the Social Assessment Action Plans FY2021 were not reviewed and updated regularly, causing some social issues faced by the workers not taken into account. In particular, the following social issues raised by Rajawali POM workers during audit interview were not considered: <ul style="list-style-type: none"> i) Workers had to incur their own costs in replacing light bulbs in the houses. ii) Workers had to rent a van @RM30 per person to go to Bintulu town to withdraw their monthly salaries. The grocery shop which facilitates cash withdrawal sometimes run out of cash. Workers also allege preferential treatment by the shop in favour or selected workers. iii) The change in working hours where the 1st shift ends at 5.00PM has deprived them of time for recreational activities. <p><i>Therefore, a Major Non-Compliance No. RZ 01 of 2021 was raised.</i></p>
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	YES	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and available for review. The procedures were briefed to the workers during their induction course, and also during muster briefings.

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Clause	Indicators	Comply Yes/No	Findings
	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. All local applications are preceded with a job application form, relevant qualifications and certificates, job interview, records of medical check-up, and the issuance of letter of job offer.
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	The Health, Safety & Environment (HSE) Policy Statement by Upstream Malaysia has been revised and signed by the CEO. It is available in Bahasa Malaysia and English language. The policy has been communicated to all employees through briefings and hardcopy of policies were seen displayed at the estates and POM notice boards. Based on interview was conducted to mill workers, harvesters, spraying and manuring operator, observed they are aware and understood regarding occupational health and safety matters. The hazard identification, risk assessment and risk control (HIRARC) procedure was established. Rajawali CU have conducted the risk assessment on all its operation as well as determining their control measures. On overall performance, OSH administrative controls implementation as well as engineering control equipment was found adequate during the assessment.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	Occupational health and safety (OHS) management plan for Rajawali CU had been established. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, audiometric test, use of PPE, OSH Committee meetings, etc. Generally, the OSH plans 2021 were acceptable.
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	The organization had established annual training programmes for 2021 with training subjects includes the following: 1.OSH Act & regulations 2.Environmental Quality Act & regulations 3.Understanding of group policy & authority 4.HIRARC 5.EAI & EIA 6.Hearing Conservation programmes 7.PPE usage 8.Emergency preparedness and response 9.Firefighting & chemical spillage handling
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	NO	Records of training was maintained, where appropriate on an individual basis. However, training which covers applicable aspects of the RSPO P&C, i.e. policy on prohibiting retaliation against Human Rights Defenders, has not been effectively communicated to all levels of the workforce. There is negligible to minimum understanding of the Policy on prohibiting retaliation against Human Rights Defenders in audit interviews of various levels of workforce. <i>Therefore, Minor NCR RZ 02 2021 was issued.</i>

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Clause	Indicators	Comply Yes/No	Findings
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	YES	Training related to SCCS has been conducted in Nov 2021 by regional sustainability to PIC POM handle critical task such as weighbridge operator, document clerk, AP, etc. During interview with PIC handling weighbridge was confirmed he understand related to critical point during received the FFB.

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	Rajawali Palm Oil Mill (RPOM) sourced for their FFB only from estates under the same SOU which involve 4 supply bases (estates). They were Rajawali, Bayu, Samudera and Semarak Estates, and SDPB sister estate such as Damai Estate, Sahu Estate, Derawan Estate, and Takau Estate.
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	Not Applicable, since RPOM is IP Mill.
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	Projection data available as in Table 4.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	YES	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information were: Name: Rajawali Oil Mill Country: Malaysia. Member Category: Oil Mil Core product: Palm Oil
3.8.5	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: <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	POM had revised their documented procedure title 'Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001', version 2, Issue 5 dated April 2019. - The procedure was kept in file RSPO Supply Chain Manual (SCM/RSPO/SD) Appropriate changes were also made in the change to include the new clause Production of ISCC certified waste/residues materials at the mill. Training was conducted in Nov 2021. - The Senior Assistant Manager & weighbridge operator have overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Rajawali POM. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements. - RPOM had continued to implement the procedures it had on receiving and processing of RSPO certified FFBS.
3.8.6	The site shall have a written procedure to conduct annual internal audit to determine whether the organisation; <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 internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall 	YES	As describe under para 18.0 SOP for sustainable Supply Chain and Traceability issue no 5 dated April 2019, RPOM refer to Internal Audit Procedure which follow the RSPO Supply Chain Certification Standard requirements. Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard requirements. RSPO internal audit was conducted by the internal auditors and has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 0 nonconformance report (NCR) were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor. - Documented procedure has defined management review will be conducted once a year.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.		Management review meeting has been conducted in Nov 2021.
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	YES	RPOM had continued to receive certified FFBs from the CU's own supply bases as well as certified FFBs from sister estate. There were 4 supply bases (estates) sending certified FFBs to KPOM. They were Bayu Estate, Samudera Estate, Semarak Estate and Rajawali Estate and sister estate such as Damai Estate, Saha Estate, Derawan Estate, and Takau Estate. The validity of the certificate of the supplier has been checked accordingly. There was no non-certified FFB received based on the records.
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ol style="list-style-type: none"> 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, RPOM has deliver certified materials to end buyer such as Sime Darby Austral KCP for Palm kernel & Sime Darby Oils Bintulu Sdn Bhd for crude palm oil. Therefore, following are sample of certified CPO & PK sales which comply to standard requirement.
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</p>	YES	There are 2 outsource company CPO & PK transporter. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training was available. There is addendum contract document between RPOM and the transporters. stated in that (point (iv) – provide access to the RSPO auditors to contractor's operation site(s) and employees whenever deemed necessary. The contractor

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>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>		<p>agrees that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. Contractor also sign the vendor COBD which contain disallowed child labour, forced labour, trafficking labour, equal opportunity, etc.</p> <p>The RSPO Supply Chain procedure has described on Para 13.0 Outsource Contractor and briefed to the contractor in Nov 2021.</p>
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.
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	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. Relevant record was maintained for more than 2 years as per Standard operating procedure for Sustainability Supply Chain and Traceability.
	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	
	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	Sighted record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.
	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.	YES	Not applicable RPOM used IP model.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)</p>		
3.8.13	<p>Extraction rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	YES	RPOM 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). OER & KER has been updated by daily basis and monthly summary has been used as guidance.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	YES	
3.8.15	<p>Processing</p> <p>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.</p>	YES	Global Trading & Marketing (GTM) office informed RPOM by e-mail on the dispatch of RSPO certified CPO/ PK to relevant buyer. The dispatch of the RSPO certified CPO/PK to buyer by RPOM were made based on a specific contract. The receiving pit, pipelines and tanks in RPOM were thoroughly cleaned, swept and flushed before RSPO certified CPO was pumped in to avoid contamination. Dedicated tanks were used to store RSPO certified CPO produced.
3.8.16	<p>Registration of Transactions</p> <p>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.</p> <p>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</p>	YES	The registration of transaction being carried out by Group Plantation Marketing subordinate using the RSPO Member ID. Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).
3.8.17	<p>Claims</p> <p>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.</p>	YES	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. RPOM 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, 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 is documented in SDPB's Human Rights Charter incorporates, inter alia, commitment to providing equal opportunities, respecting freedom of association, eradicating any forms of exploitation, respecting community rights and rights of indigenous peoples, protecting rights of children, eliminating violence and sexual harassment. The policy to prohibit retaliation against Human Rights Defenders (HRDs) is documented in SDPB's contained in the Policy on the Protection of Human Rights Defenders dated 25 March 2020. Paragraph 3.3 of this Policy provides protection against violence, threats and retaliation to HRDs and individuals acting in good faith to exercise their fundamental human rights, in the course of their engagement with SDP.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	There is no evidence of any use of violence or the instigation of violence within the Rajawali SOU. This was further verified during interviews held with external stakeholders and security personnel.
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 Rajawali CU in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Procedures for handling Social Issues". Each operating unit each has its own Internal and External Complaint Books. 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. Under Sime Darby's Policy on the Protection of Human Rights Defenders specifically provides for the protection of HRDs with the main objective of ensuring our internal mechanisms prevent harm, protect, and respond to complaints made by HRDs. Clause 3.3 of the Policy states that HRDs and individuals acting in good faith to exercise their fundamental human rights, in the course of their engagement with SDP shall be protected from violence, threats and all forms of retaliation. Anonymity of complainants and whistleblowers are ensured under the Sime Darby Code of Business Conduct which provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	Rajawali CU ensures that affected parties including illiterate parties understand the procedures by distributing grievance procedure videos as well as posters and presentation materials in pictorial/infographics format, and scanning a QR code.

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Clause	Indicators	Comply Yes/No	Findings
	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	The Rajawali SOU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. Verified during the audit were complaint received from workers about house defects, date of action taken to rectify the defects which was usually within 48 hours of complaints being lodged, and acknowledgement by the complainants.
	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	In the Sustainable Plantation Management System, Flowchart and Procedure on Handling Social Issues states upon failure of negotiation process involving estate management, representatives from the disputed parties, zone heads, third parties and stakeholders, legal proceedings may follow. The same document on procedures Handling Land Disputes states that "further negotiation processes may involve independent third parties such as representatives from the Land Office or from other NGOs."
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	Contributions were evident.
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 Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	YES	Assessor has verify and can be confirmed that, the land was belonged to Austral Enterprise Bhd. The land was bought by Golden Hope Plantation Sdn Bhd before the merge with Sime Darby in year of 2008. Original copies of Land titles were kept at SDPB headquarters while Rajawali Mill and Estates maintained photocopies of the relevant land titles. Some of the titles were shared by the estate.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC	YES	It has been verified that the land belonged to Austral Enterprise Bhd. The land was bought by Golden Hope Plantation Sdn Bhd before the merge with Sime Darby in year of 2008. The audit team had confirmed that there were no land issues related to previous owners. No land was encumbered by customary rights or dispute from any stakeholder at Rajawali CU.

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Clause	Indicators	Comply Yes/No	Findings
	process are available and include:		<p>However, there was one issue regarding the land claim at Rajawali Estate. The squatters in Rajawali Estate started during Messrs. Anib Plantation Sdn Bhd (APSB) era. It occupies approximately 3,291 ha. In 1993, the number of reported squatters was 471 and increased to 760 in 1998. The company had taken a lot of time and effort to resolve and compromised on this issue which included offering them a 5-acre plot to each squatter. As for this Audit, the audit team interviewed with local communities Representative and they confirmed that there was no new land claim made by the Indigenous people since Sime Darby released the disputed land in 2012.</p>
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	YES	
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	YES	
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	YES	
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where	YES	<p>As for this Audit, the audit team interviewed with local communities, and it has been confirmed that there was no new land claim made by the Indigenous people since Sime Darby released the disputed land in 2012.</p>

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Clause	Indicators	Comply Yes/No	Findings
	applicable, and relevant authorities).		
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	No land dispute as mentioned above, hence this requirement is not needed and not applicable for the CU.
	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	No land dispute as mentioned above, hence this requirement is not needed and not applicable for the CU.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	No land dispute as mentioned above, hence this requirement is not needed and not applicable for the CU.
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	YES	Based on Social Impact Assessment (SIA) Report for SOU Rajawali and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Sime Darby SOU Rajawali since 2008. The audit team had confirmed that there were no land issues related to previous owners.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	YES	Based on Social Impact Assessment (SIA) Report for SOU Rajawali and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Sime Darby SOU Rajawali since 2008. 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
	4.5.3 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	Documents review and interview with representative from adjacent local community and verified that so far, no claim and conflict on tenure and legal/customary use of Rajawali SOU Estate's land had occurred. This Indicator is not applicable.
	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	Documents review and interview with representative from adjacent local community confirmed that so far, no claim and conflict on tenure and legal/customary use of Rajawali SOU Estate's land had occurred. This Indicator is not applicable.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	YES	Documents review and interview with representative from adjacent local community confirmed that so far, no claim and conflict on tenure and legal/customary use of Rajawali SOU Estate's land had occurred. This Indicator is not applicable.
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning	YES	Documents review and interview with representative from adjacent local community confirmed that so far, no claim and conflict on tenure and legal/customary use of Rajawali SOU Estate's land had occurred. This Indicator is not applicable.

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Clause	Indicators	Comply Yes/No	Findings
	phases of the operations prior to the issuance of a new concession or land title to the operator.		
	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	Documents review and interview with representative from adjacent local community confirmed that so far, no claim and conflict on tenure and legal/customary use of Rajawali SOU Estate's land had occurred. This Indicator is not applicable.
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 entitled "Procedures for Handling Boundaries Disputes". In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	In accordance with the "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at mill and visited estates.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	YES	There was no scheme small holdings at Rajawali SOU CU. The Fresh Fruit Bunches are supplied from SDPB owned estates which are certified to RSPO.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and	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
	made publicly available to them.		
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System document entitled "Procedures for Handling Boundaries Disputes". In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	YES	There was no issue regarding compensation (monetary or otherwise) to villagers, local community and neighbouring estate. The audit team has also interviewed with villager representatives and confirmed there was no compensation issue.
	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 Rajawali SOU. 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. The audit team has also interviewed with village representatives and confirmed there was no access and rights issues. Insofar, 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 Rajawali SOU. 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. The audit team has also interviewed with village representatives and confirmed there was no access and rights issues. So far, there were no issues regarding land with villagers, local community and neighbouring estate, it has been verified that the land is now legitimately owned by Sime Darby since 1980. The audit team had confirmed that there were no land issues related to previous owners.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented	YES	Land conflict is not present in the area of the unit of certification. The audit team has also interviewed the village representative and from the interviews, it can be concluded that there was no land conflict at Rajawali SOU.

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Clause	Indicators	Comply Yes/No	Findings
	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.		
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).	YES	Land conflict is not present in the area of the unit of certification. The audit team has also interviewed the village representative and from the interviews, it can be concluded that there was no land conflict at Rajawali SOU.
	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 neighbouring communities where applicable).	YES	Land conflict is not present in the area of the unit of certification. The audit team has also interviewed the village representative and from the interviews, it can be concluded that there was no land conflict at Rajawali SOU.

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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	Rajawali Palm Oil Mill was an Identity Preserved Mill and therefore only receives and processes FFB from its own internal sources namely Samudera Estate, Bayu Estate, Rajawali Estate, Semarak Estate and other SD group of estates. No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	Rajawali Palm Oil Mill was an Identity Preserved Mill and therefore only receives and processes FFB from its own internal sources namely Samudera Estate, Bayu Estate, Rajawali Estate, Semarak Estate and other SD group of estates. No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	Rajawali Palm Oil Mill was an Identity Preserved Mill and therefore only receives and processes FFB from its own internal sources namely Samudera Estate, Bayu Estate, Rajawali Estate, Semarak Estate and other SD group of estates. No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	YES	Rajawali Palm Oil Mill was an Identity Preserved Mill and therefore only receives and processes FFB from its own internal sources namely Samudera Estate, Bayu Estate, Rajawali Estate, Semarak Estate and other SD group of estates. No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	It was evident that contracts entered into with FFB and CPO transporters are fair, legal and transparent. Among others, the contracts are dated, with clear provisions on contract duration, scope of services, payment of fee, obligation and undertaking of parties, provisions related to default and termination, rights and obligations upon termination, clause on dispute, etc. Annex 2 and 3 of the contracts specify schedule of transportation rates and transport rate adjustment mechanism, respectively.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid	YES	Contracts with suppliers contain a provision that payments would be made within one month of invoice.

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Clause	Indicators	Comply Yes/No	Findings
	are given.		
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	Weighing equipment verified through third party and the inspection was done in Nov 2021.
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	YES	Sime Darby Plantation supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.
	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	No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.
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	No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	YES	No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.

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Clause	Indicators	Comply Yes/No	Findings
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	(Onsite) There are no Scheme Smallholders for Rajawali CU, and therefore this Indicator is not applicable.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	(Onsite) Rajawali Palm Oil Mill was an Identity Preserved Mill and therefore only receives and processes FFB from its own internal sources namely Samudera Estate, Bayu Estate, Rajawali Estate, Semarak Estate and other SD group of estates. No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.

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 houses at workers' housing and information obtained during audit interviews, there is no evidence that local and foreign workers, women and local communities have been discriminated against. Review of the contracts entered with recruitment agents also state that no recruitment fee is payable by migrant workers. Interviews conducted with migrant workers from Indonesia also confirmed that there is no discrimination and that they had not paid any recruitment fees.
	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	Rajawali SOU was 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. Among the documents that are needed when applying for a job are job application form, identification documents, relevant certificates, medical test results. 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.

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Clause	Indicators	Comply Yes/No	Findings
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	YES	Based on interviews with female workers, Estate Health Assistants and Medical Assistant, there was no evidence that pregnancy tests are being conducted as a discriminatory measure. Should a worker whose job comes into contact with chemicals, e.g., sprayers, or lab assistants become pregnant, she would immediately be re-assigned to an alternative job employment that doesn't involve contact with chemicals.
	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 at the Mill all the Estates within Rajawali CU. Each gender committee comprise female employees of all levels, including wives of male employees. Among the activities carried out by the Gender Committee include awareness briefings on sexual harassment, reproductive rights, domestic violence, how to lodge complaints 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, documentation of pay and conditions are contained in in employment contracts (for migrant 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 Malaysia. Records of trainings on their contracts of employment and wage calculation were also sighted.
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	YES	The employment contracts signed between the estate/mill management contain employment and payment terms and provisions covering duration of employment, place of work, salary, working hours, medical, accommodation, SOCSO, transportation, public holidays, sick leave, annual leave, mutual termination of service, etc. These are all in compliance with the provisions of the Sarawak Labour Ordinance. 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. Workers interviewed also confirmed that they were briefed on the contents of their employment contract prior to signing, and that they have also attended briefings where the terms and conditions of the employment contract and payslips were explained again. The workers also confirmed that they have understood the same.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday	YES	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 workers' employment contracts, punch cards, payslips and

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Clause	Indicators	Comply Yes/No	Findings
	entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.		interviews with the workers themselves.
	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 Rajawali CU provide adequate housing and facilities to its Mill and Estate employees in accordance with the requirements of the national laws, which is the Workers' Minimum Standard of Housing and Amenities Act 1990. Houses are provided rent free with free water and electricity. Each house generally has 3 rooms and accommodate between 1 to 5 workers, and are generally in a good state of repair. Visits made during the audit to the workers' housing also confirmed that the houses are in a good state of repair and the surrounding areas are clean. All workers interviewed affirmed the same. Domestic water quality sampling were also taken and sent to Sime Darby Plantation Research Sdn Bhd for microbial analysis.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	All units within Rajawali CU have their own canteen/grocery store which sell basic items such as eggs, flour, rice, cooking oil, vegetables, onions, frozen food such as fish, meat, etc. Rajawali Mill has four shops/canteens. Workers' access to their daily needs are from these shops. Items seen in the stores are adequate, clearly labelled and have not expired. To ensure prices of items sold are reasonable, prices of items sold in several supermarkets in Bintulu were compiled by SQM and referred to as a basis for price comparison and monitoring.
	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.	YES	All sampled workers receive at least minimum wages based on Minimum Wages Order 2020 which came into effect on 1 February 2020. Rajawali CU has 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.
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	All workers employed within Rajawali certification unit are fulltime employees with no casual, temporary and day labour.
6.3 The unit of	6.3.1 (C) A published statement recognising freedom of association and	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

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Clause	Indicators	Comply Yes/No	Findings
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.	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.		rights of employees to form and join unions and bargain collectively. This Policy is displayed at the notice boards and explained to workers during Policy trainings.
	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	Although there are no trade unions in Sabah, the workers have elected by way of an election, their own workers' representatives to represent them on various issues.
	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	Based on interviews held with workers, evidence was available that no management interference was present during the election of workers' representatives at Rajawali CU.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	YES	The formal Policy on protection of children and non-employment of children is contained in 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. Review of the contracts entered with recruitment agents' contain provisions on the prohibition of child labour.
	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. Observations made during audit visits also did not reveal the presence of any workers below the 18 years.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	There was no evidence of the employment of any young persons within Rajawali CU.
	6.4.4 The unit of certification demonstrates	YES	The Policy against Child Labour is available in SDPB's Human Rights Charter 2020. This Policy was communicated to its internal and external stakeholders as evidenced by

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Clause	Indicators	Comply Yes/No	Findings
	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.		minutes of stakeholder meetings and trainings.
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. This Policy is displayed at all main notice boards throughout the CU. Based on interviews conducted with workers (both men and women) and members of the Gender Committees, there is awareness of this Policy, and the workers also confirmed that it is being implemented and they have not encountered any incidence of violence or 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 to protect the reproductive rights of all, especially of women exists in SDP's Human Rights Charter 2020. This Policy is displayed at all main notice boards throughout the CU. Communications on this Policy were also done during Gender Committee meetings.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	The needs of new mothers were assessed using a form known as the "New Mother Assessment Form" accordingly.
	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, an alternative independent third-party worker grievance channel with multi-languages and multi-interfaces that assures worker confidentiality unless personal details are required, where in such situations, consent will be sought by the system receiver.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment 	YES	All units within Rajawali CU were able to demonstrate that all sampled workers have entered into employment voluntarily. Foreign workers (harvesters, sprayers, manurers, mill workers etc), have not been subjected to contract substitution and no discriminatory practices against foreign workers was observed.

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Clause	Indicators	Comply Yes/No	Findings
	fees <ul style="list-style-type: none"> • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 		
	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 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	Estate / Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Manager subsequently assigned duties of ESH coordinator to the Assistants or healthcare assistant for the down line implementation of ESH practices in the estate and mill. All identified Executives were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. OSH Committee meetings confirmed that among the agenda discussed, included the following: <ul style="list-style-type: none"> ▪ Passing of previous minutes and arising matters. ▪ Accident report (Monthly Data of Mill/Estate Safety Performance) ▪ Workplace inspection ▪ Safety report and programme ▪ COVID 19 issues / matters
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites.	YES	The procedures for accident and emergencies has been established. There is formation of ERP Team & ERP for all the identified incidences. Besides that, the procedures have been summarized in a chart flow form and displayed for information of all employees in the estate. They include emergencies relating earthquake, fire, chemical spillage, flood, animal attack/poison, and accident at work place. Accident/injury record were recorded using Lost Time Accident (LTA) metrics. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting.

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Clause	Indicators	Comply Yes/No	Findings
	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 staff and workers such as the storekeepers, harvesters and sprayers/manurers were continuously trained in safe working practices including SSOP for PPE related to their job function. Appropriate PPE were given to workers based on HIRARC and SSOP recommendations suitable for the job position or hazardous operation undertaken. Records of PPE issued, and acknowledgement of receipt are maintained individually for all category of workers at mill and estates. Sighted common PPE issued included face masks respirators, goggles, safety shoes, harvesting shoes, rubber boots, nitrile/cotton gloves, apron and hard hat. In addition to basic PPE, special PPE are also provided for workers assigned to dangerous operation such as work at height and in confined space. All workers were provided with appropriate PPE where the cost are bared by the management. Interviews conducted during the site visit at the Mill and Estate showed understanding and approval from the workers that the management bares the cost of all PPEs and the workers are entitled to valid PPE, the importance of using required PPE at all times during work and proper storage and disposal methods of PPE.
	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	Medical care and accident insurance is provided to all employees, both Local and Foreign workers under Employees' Social Security Act 1969 (Act 4).
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Form JKPP 8 for 2020 was submitted to DOSH timely in Jan 2021 via MyKKP System. Accident statistics were being maintained in a satisfactory manner and periodically reviewed.

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	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	Rajawali SOU 32 continued to implement Integrated Pest Management (IPM) in all the 4 estates and continue to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Agricultural Reference Manual (ARM) Section 15 -Plant Protection. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. For bagworm control the program includes the planting of beneficial plants such as <i>Cassia cobanensis</i> ,

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Clause	Indicators	Comply Yes/No	Findings
managed using appropriate Integrated Pest Management (IPM) techniques.			<i>Antigonan leptopus</i> and <i>Turnera subulata</i> and for rhinoceros beetles is by using pheromone traps. Rajawali SOU 32 carried out census on rat damage and diseases like Ganoderma. The IPM technique to control rats includes rearing Barn owls (<i>Tyto alba</i>) and rat baiting was by calendar baiting at 2 campaigns per year. Rat baiting would continue until bait acceptance fell below 20%. The procedure referred was in the Agricultural Reference Manual (ARM) Section 15 - Plant Protection.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	This is not practiced in the all estates. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.
	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	Rajawali SOU 32 continued to use the Agricultural Reference Manual (ARM) policy of no open burning. It was evident that all palms were felled, shredded, windrowed and left to decompose.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	Rajawali SOU 32 continued to use agrochemicals based on its Agricultural Reference Manual (ARM) Section 15 and 16, SSOP and Pictorial Safety Standard Book (PSS) where written justifications had been provided for various fields operations. The Manual has included a chemical register list which indicates the use of selective products that are specific to the target pest, weed or disease.
	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	Rajawali SOU 32 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. All the estates had documented programs for spraying pesticides and for rat baiting. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	Rajawali SOU were committed to minimise the usage of agrochemicals by implementing Integrated Pest Management (IPM) plans. Blanket spraying was not practised by this SOU and soft grasses maintained in the field. It had also been the practice that pesticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section 15 -Plant Protection and that no prophylactic use of such pesticides would be permitted.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	All the 4 estates only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Reg. 2000. From the review of the chemical register, it was noted that all pesticides used were of class ii, iii & iv. The use of paraquat had been banned in all Sime Darby Plantation Berhad Estates. There was no evidence of pesticides that are categorised as World Health

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Clause	Indicators	Comply Yes/No	Findings
			Organisation Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. From records and interviews with workers, staff and estate assistants, found that they were trained, all precautions taken and all legal requirements met.
	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	All the 4 estates only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Reg. 2000. From the review of the chemical register, it was noted that all pesticides used were of class ii, iii & iv. The use of paraquat had been banned in all Sime Darby Plantation Berhad Estates. There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. From records and interviews with workers, staff and estate assistants, found that they were trained, all precautions taken, and all legal requirements met.
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	
	7.2.5b Why there is no other alternative which can be used.	YES	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES	
	7.2.5d What is the process to limit the negative impacts of the application.	YES	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	YES	The estate and mill have the SSOP for use of PPE during working. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. Observed during site visit, the PPE provided to the operators such as google, face respirator, nitrile hand glove, rubber boot and apron. Additionally, the operators have been given training regarding the usage safety and health issue and proper way for chemical application by the plantation executives, manager, and asst. manager and chemical supplier with knowledge on chemical handling and applications.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	Pesticides selected for use were those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with OSH USECHH

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Clause	Indicators	Comply Yes/No	Findings						
			Regulations (2000). At all visited mill and estate the storage of pesticides was in accordance with recognized best practices. They were stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OHS CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were found available in Bahasa Malaysia language understood by workers or explained carefully to them by a plantation management official at operating unit level.						
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	Empty pesticide containers was punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Inventory and consignment documents verified for confirmation of proper management and disposal.						
	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 is not a practice in Rajawali SOU 32 There was no evidence to show that such a method being used in the 4 Estates.						
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	Specific annual medical surveillance for pesticide operators and documented action to treat related health conditions was carried out annually.						
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	YES	Rajawali CU continued to comply with as per SSOP Chemical Spraying / P&D dated 01/11/2021 where no work with pesticides was given to persons under the age of 18, pregnant or breast-feeding women. List workers involved with pesticides were maintained by the estate and mill. Identification of pregnancy was done at the estate's clinics during the monthly medical check-up and interview with female workers. Pregnancy test was conducted on doubtful cases.						
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	YES	<p>The organization had maintained waste management plan for year 2021. The details as per table below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Type of waste</th> <th style="text-align: center;">Location</th> <th style="text-align: center;">Action</th> </tr> </thead> <tbody> <tr> <td>Scheduled waste such Spent Lubricants, Spent hydraulic, used filters,</td> <td>Workshop, Engine room, Chemical mixing area, Clinic</td> <td>As stipulated in SOP handling of Scheduled waste, SOP of triple rinsing</td> </tr> </tbody> </table>	Type of waste	Location	Action	Scheduled waste such Spent Lubricants, Spent hydraulic, used filters,	Workshop, Engine room, Chemical mixing area, Clinic	As stipulated in SOP handling of Scheduled waste, SOP of triple rinsing
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Clause	Indicators	Comply Yes/No	Findings	
manner.			spent chemicals, empty pesticides container, clinical waste and etc.	& SOP on disposing Empty pesticides Container.
			Domestic waste such as rubbish and sewage.	Line site, office, mill plant Allocate landfill away from waterways, recycle programmes and awareness to employees.
			Industrial waste such as POME, EFB, Boiler ash, Decanter cake, scrap metal.	ETP, EFB station, Boiler station, workshop. Monitoring of POME & sell to third party
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	The procedure PSQM Operational Control Procedure–Scheduled Wastes (Hazardous Waste) Management has been established.	
7.3.3 The unit of certification does not use open fire for waste disposal.	YES	Based site inspection, the unit of certification does not use open fire for waste disposal.		
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	Rajawali SOU 32 continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer recommendations. Fertilizer application, which was of paramount importance for maintenance of soil fertility, were carried out based on the recommendation made by the Agronomist from Sime Darby Research Sdn. Bhd based on annual foliar sampling done.	
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	The recommendations by the Agronomist were also available during the inspection and the application of fertilizers had been carried out as recommended and scheduled. Noted from the records that the actual number of fertilisers applied in 2021 were completed. Rajawali SOU 32 practised the maintenance of long-term soil fertility and plant health by annual application of fertilizers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and EFB, POME and compost application, water management and by maintaining soft weeds within interlines.	
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	YES	Rajawali SOU 32 had a nutrient recycling strategy where palm fronds were properly stacked in the interrow to decompose and EFB were applied in the mature and immature area of Samudera, Semarak and Rajawali Estates respectively.	
	7.4.4 Records of fertiliser inputs are maintained.	YES	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	

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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	<p>applications of fertilisers were made available to auditors.</p> <p>During the field visit and the soil map provided it was observed that no fragile or marginal soils in Rajawali SOU32. The soils series were as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Bayu Estate</th> <th style="text-align: center;">Samudera Estate</th> <th style="text-align: center;">Semarak Estate</th> <th style="text-align: center;">Rajawali Estate</th> </tr> </thead> <tbody> <tr> <td>Bekenu</td> <td>Bekenu</td> <td>Derawan</td> <td>Semarak</td> </tr> <tr> <td>Semarak</td> <td>Semarak</td> <td>Semarak</td> <td>Nyalau</td> </tr> <tr> <td>Bedup</td> <td>Derawan</td> <td>Bekenu</td> <td>Bedup</td> </tr> <tr> <td>Derawan</td> <td>Bedup</td> <td>Nyalau</td> <td>Derawan</td> </tr> <tr> <td>Bukit tuku</td> <td>Nyalau</td> <td>Bukit tuku</td> <td>Gong Chenak</td> </tr> <tr> <td>Nyalau</td> <td>Lunas</td> <td>Gong chenak</td> <td>Gali</td> </tr> <tr> <td>Sibuga</td> <td></td> <td>Rasau</td> <td>Tebok</td> </tr> <tr> <td>Gong chenak</td> <td></td> <td>Lunas</td> <td>Bekenu</td> </tr> <tr> <td></td> <td></td> <td>Bedup</td> <td>Marang</td> </tr> <tr> <td></td> <td></td> <td>Unclassified</td> <td>Sibuga</td> </tr> <tr> <td></td> <td></td> <td></td> <td>Durin</td> </tr> <tr> <td></td> <td></td> <td></td> <td>Saratok</td> </tr> <tr> <td></td> <td></td> <td></td> <td>Rasau</td> </tr> <tr> <td></td> <td></td> <td></td> <td>Unclassified</td> </tr> </tbody> </table>	Bayu Estate	Samudera Estate	Semarak Estate	Rajawali Estate	Bekenu	Bekenu	Derawan	Semarak	Semarak	Semarak	Semarak	Nyalau	Bedup	Derawan	Bekenu	Bedup	Derawan	Bedup	Nyalau	Derawan	Bukit tuku	Nyalau	Bukit tuku	Gong Chenak	Nyalau	Lunas	Gong chenak	Gali	Sibuga		Rasau	Tebok	Gong chenak		Lunas	Bekenu			Bedup	Marang			Unclassified	Sibuga				Durin				Saratok				Rasau				Unclassified
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	7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	<p>Rajawali SOU 32 had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ul style="list-style-type: none"> • Slope & River Protection Policy • Buffer Zone & 25 degree slope and in item 8 Section 4 • Land Preparation for Terracing in ARM Manual. <p>It was observed that no replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the SOU.</p>																																																												
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	<p>Rajawali SOU 32 had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. It was observed that there is no new planting of oil palm on steep terrain.</p>																																																												
7.6 Soil surveys and topographic information are used for site planning in the establishment of	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	YES	<p>Rajawali SOU 32 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, and it was observed that no fragile or marginal soils were found in Rajawali SOU 32.</p>																																																												
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in	YES	<p>There were no marginal and fragile soils in the Rajawali SOU 32.</p>																																																												

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new plantings, and the results are incorporated into plans and operations.	accordance with the soil management plan for best practices.		
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	Rajawali SOU 32 had a management strategy for palm oil cultivation taking into account the soil surveys and topographic information in planning of drainage and irrigation systems, roads and other infrastructure. The topographic information was provided and reviewed by the auditors.
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	YES	This is <i>not applicable</i> as there is no peat soil in the entire 4 estates in the Rajawali SOU 32 as supported by the soil maps of respective estates.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	YES	This is <i>not applicable</i> as there is no peat soil in the entire 4 estates in the Rajawali SOU 32 as supported by the soil maps of respective estates.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	This is <i>not applicable</i> as there is no peat soil in the entire 4 estates in the Rajawali SOU 32 as supported by the soil maps of respective estates.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	This is <i>not applicable</i> as there is no peat soil in the entire 4 estates in the Rajawali SOU 32 as supported by the soil maps of respective estates.
	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.	YES	This is <i>not applicable</i> as there is no peat soil in the entire 4 estates in the Rajawali SOU 32 as supported by the soil maps of respective estates.

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	This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.																						
	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	This is <i>not applicable</i> as there is no peat soil in the entire 4 estates in the Rajawali SOU 32 as supported by the soil maps of respective estates.																				
	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	This is <i>not applicable</i> as there is no peat soil in the entire 4 estates in the Rajawali SOU 32 as supported by the soil maps of respective estates.																				
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	<p>The organization had established water management plan for year 2021.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Operating Unit</th> <th style="text-align: center;">Action Plan</th> <th style="text-align: center;">Status</th> </tr> </thead> <tbody> <tr> <td rowspan="2" style="text-align: center;">Rajawali POM</td> <td>Rain water harvesting for cleaning and washing</td> <td style="text-align: center;">On going</td> </tr> <tr> <td>Re stream from sterilizer condensate pit for dilution</td> <td style="text-align: center;">On going</td> </tr> <tr> <td rowspan="4" style="text-align: center;">All Estates</td> <td>Rain water harvesting for cleaning and washing</td> <td style="text-align: center;">On going</td> </tr> <tr> <td>Rain water harvesting for watering at nursery</td> <td style="text-align: center;">On going</td> </tr> <tr> <td>To identified natural waterways in the estates and comply with JPS guideline on minimum width for river reserve.</td> <td style="text-align: center;">Completed</td> </tr> <tr> <td>To place awareness signages</td> <td style="text-align: center;">Completed</td> </tr> <tr> <td></td> <td>To maintain soft grasses in mature plantings at the inter row, field & collection drains edges and roadsides.</td> <td style="text-align: center;">On going</td> </tr> </tbody> </table>	Operating Unit	Action Plan	Status	Rajawali POM	Rain water harvesting for cleaning and washing	On going	Re stream from sterilizer condensate pit for dilution	On going	All Estates	Rain water harvesting for cleaning and washing	On going	Rain water harvesting for watering at nursery	On going	To identified natural waterways in the estates and comply with JPS guideline on minimum width for river reserve.	Completed	To place awareness signages	Completed		To maintain soft grasses in mature plantings at the inter row, field & collection drains edges and roadsides.	On going
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	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	Monitoring of river water quality been conducted by operating units. Specific for estates, river water monitoring thru Environmental Monitoring report which submitted quarterly to Natural Resource and Environment board.												
	7.8.1b Workers have adequate access to clean water.	YES	RPOM had treat raw water to clean water by their own treatment plant and supply for domestic used including to Rajawali estate. Monitoring of treated water quality been done by appointed third party.												
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones	YES	Sighted during site visit the organization had maintained their Water courses and wetlands and also maintaining appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves.												
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	YES	Mill effluent been monitor and reported thru OER.doe.gov.my by Rajawali POM.												
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	The monitoring of mill water usage been conducted accordingly.												
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	The organization had maintained and established Fossil Fuel Reduction Plan with latest updated in June 2021. Among the strategies been plan and executed by the operating units were: 1.Scheduled maintenance for machineries and vehicles. 2.Awareness to employee on reduce fuel usage 3.Ensure nozzle is always locked to avoid unauthorized diesel filling.												
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	The CU had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. For input FY 2020, the report sends via email to RSPO on 29/11/2021 through the Palm GHG calculator and publicly reported. <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Description</th> <th style="text-align: center;">tCO₂e/tProduct</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Year</td> <td style="text-align: center;">FY 2020</td> </tr> <tr> <td style="text-align: center;">CPO</td> <td style="text-align: center;">1.94</td> </tr> <tr> <td style="text-align: center;">PK</td> <td style="text-align: center;">1.94</td> </tr> </tbody> </table> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Production</th> <th style="text-align: center;">t/yr</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Year</td> <td style="text-align: center;">FY 2020</td> </tr> </tbody> </table>	Description	tCO ₂ e/tProduct	Year	FY 2020	CPO	1.94	PK	1.94	Production	t/yr	Year	FY 2020
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Diverted to methane capture (electricity generation)	8%																																																											
	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	Auditor 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 Rajawali CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.																																																									
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	<p>For RPOM, identified significant pollutants been addressed by the management. Sighted the progress of mitigating measures been monitored as per table below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Environmental Issue</th> <th style="text-align: left;">Mitigating Measures</th> <th style="text-align: left;">Status</th> </tr> </thead> <tbody> <tr> <td>Black Smoke emission</td> <td>ESP under construction with new boiler</td> <td>On going</td> </tr> <tr> <td>Effluent discharge</td> <td>Tertiary plant treatment</td> <td>On going</td> </tr> <tr> <td>Scheduled waste</td> <td>Sending it to authorize waste collector for disposal</td> <td>On going</td> </tr> </tbody> </table> <p>For estate identified significant pollutants been addressed by the management. Sighted the</p>				Environmental Issue	Mitigating Measures	Status	Black Smoke emission	ESP under construction with new boiler	On going	Effluent discharge	Tertiary plant treatment	On going	Scheduled waste	Sending it to authorize waste collector for disposal	On going																																										
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Clause	Indicators	Comply Yes/No	Findings															
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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	Guided by SDPB ARM, preparation of replanting using fire is not allowed. Based on site visit at at SOU Rajawali estates, there was no trace of burning observed. Palm trunks were chipped and windrowed at estates conducting replanting.															
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	At the estates level, there are fire prevention team established. Among the mechanisms to prevent fire are training on firefighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump.															
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	During external stakeholder meeting in Nov 2021 that was carried out at Rajawali CU, all stakeholders including neighbour was briefed on fire prevention and control measures.															
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	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 CU since 15 November 2018. Hence, this Indicator is not applicable.															
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	SOU Rajawali has reviewed their HCV with new assessment conducted in June 2017. The new HCV assessment titled 'HCV Assessment for Sarawak Zone which included both the planted area and relevant wider landscape-level considerations with villages and forest reserved. The total area of HCV area for SOU Rajawali is 275.40 ha HCV area.															
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	YES																
	7.12.2b: Any new land clearing (in existing	YES																

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Clause	Indicators	Comply Yes/No	Findings
	plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.		
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains 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	The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan dated in June 2021.
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	YES	Not applicable as no local community was identified in HCV 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	YES	Although there was no RTE species found in the CU, Rajawali SOU still conduct programme to regularly educate the workforce about the status of RTE species in Malaysia. Sime Darby also 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.

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Clause	Indicators	Comply Yes/No	Findings
	and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.		
	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	Rajawali CU conducted an on-going monitoring of their HCV4 areas as evidenced by the records in the 'Monitoring of HCV & Conservation Area' files at all Estates. 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.
	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 no new land clearing without prior HCV assessment since November 2005 and or without prior HCV-HCSA assessment since 15 November 2018 where the Remediation and Compensation Procedure (RaCP) applies.

RSPO Certifications Systems for P&C and RISS, Nov 2020

Clause	Indicators	Comply Yes/No	Findings
<p>5.5.2 Time-bound plan</p> <p>A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.</p>	<p>(a) As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.</p>	YES	<p>SDPB is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.</p> <p><u>Indonesia</u> 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 PT Sandika Natapalma & PT Budidaya Agro Lestari Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing.</p>

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				<p>As of 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</p> <p>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</p> <p>SAP 1 Estate PLASMA will be undergone 2nd stage audit on 2019.</p> <p>PT Guthrie Pecconina PT Bina Sains Cemerlang, PT Sime Indo Agro</p> <p>Land legalization still in progress.</p> <p>PT Bina Sains Cemerlang, PT Sime Indo Agro</p> <p>Issue in getting Surat Perijinan, still in progress.</p> <p><u>Papua New Guinea (NBPOL)</u></p> <p>Markham Farming Company Limited (MFCL) / Markham Agro Pte. Ltd.</p> <p>Estimate to be certified on year 2020.</p> <p>The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore, the Remediation and Compensation Procedure will be required to be full filled in order to achieve certification. The Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEIA and LUCA are being undertaken in order to submit and mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration. https://rspo.org/certification/remediation-and-compensation/racp-tracker no 82</p>
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	YES	<p>It can be confirmed that there were several changes to the current time bound plan as verified during this audit.</p> <p>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.</p> <p>http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965.</p>
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed	YES	<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</p>

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		by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);		Ltd (MPOI). http://www.simedarbyplantation.com/media/press-releases/sime-darbyplantation-completes-divestment-of-its-liberia-operations
	(d)	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.	YES	
5.5.3 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 New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	YES	Based on internal and external audit (ISPO certified) there was no replacement of primary forest or HCV areas in the uncertified management unit. Except for NBPOL area which have potential liabilities of RSPO grower members and the stages of the Remediation and Compensation Procedures (RaCP) that the management units (MUs) are currently undergoing. 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 4.4, 4.5, 4.6, 4.7 and 4.8;	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.

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				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 accordance with RSPO P&C criterion 4.2;	YES	Based on the internal audit report, there were no labour dispute that were not being resolved yet through an agreed process for all uncertified units for all 7 uncertified units of Sime Darby Plantation Sdn Bhd - Indonesia as at June 2019.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	Based on internal and external audit (ISPO certified) there was no legal non-compliance recorded at the CU.
	(e)	<p>The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self- declarations only by the company,</p> <p>with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:</p>	YES	<p>For TBP dated March 2021, there was several CUs located in Indonesia and 1 unit in Papua New Guinea (NBPOL) not yet completed. Summarized as below:</p> <p>Land legalization – PT Guthrie Pecconina, PT Bina Sains Cemerlang, PT Sime Indo Agro (INA)</p> <p>Surat perijinan in progress (Jadual Pematuhan) – PT Sandika Natapalma/PT Budidaya Agro Lestari (INA)</p> <p>NPP – Markham Farming & Markham Agro (NBPOL)</p> <p>Sold off – PT Mitral Austral Sejahtera (INA), Sime Darby Plantation Grand Cape Mount (Liberia).</p>
		<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	
		<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	
		<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 	YES	
		<ul style="list-style-type: none"> If necessary, the audit team may decide 	YES	

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		on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.		
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.	YES	
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.	YES	

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<p>5.6.6 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. The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit. The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>	<p>No additional indicators</p>	<p>YES</p>	<p>As it has been mentioned in 4.4.1 of this checklists, 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>
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Attachment 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
3.4.3 RZ 01 2021	Major	<p>Finding: The Social Assessment Action Plans FY2021 for all operating units within SOU 32 were not reviewed and updated regularly in a participatory way.</p> <p>Objective evidence: The Social Assessment Action Plans FY2021 (SAAP 21) for SOU 32 were not reviewed and updated regularly, causing the following social issues faced by the workers not taken into account. In particular, at Rajawali Palm Oil Mill (SAAP 21 updated on 26 Nov 2021), the following issues were not participatory assessed:</p> <ul style="list-style-type: none"> a) Workers had to incur their own costs in replacing light bulbs in the houses. b) Workers had to rent a van @RM30 per person to go to Bintulu town to withdraw their monthly salaries. The grocery shop which facilitates cash withdrawal sometimes run out of cash. Workers also allege preferential treatment by the shop in favour or selected workers. c) The change in working hours where the 1st shift ends at 5.00PM has deprived them of time for recreational activities. 	<p>Root Cause: The social impact assessments were done in many levels and there was no specific platform to monitor both positive and negative action plans for the OU.</p> <p>Correction: To provide social action plan that entails assessments conducted at OU and regional levels that is currently reviewed every week.</p> <p>Corrective action: To establish Social Dialogue with elected workers representatives to collate issues regarding workers' safety, health and welfare. To include all issues highlighted by the workers representatives into the Social Dialogue Action Tracker</p>	<p>Auditor has verified the SIA management action plan 2022 was reviewed and updated on 09/01/2022 to include all 3 issues highlighted. Mill manager as responsible person to ensure all issues been resolved according to timeline.</p> <p style="text-align: center;">Status: Closed</p>
3.7.2 RZ 02 2021	Minor	<p>Finding: Records of training aspects of the RSPO P&C, i.e. policy on prohibiting retaliation against Human Rights Defenders are maintained, however, the implementation was not effectively communicated by individual basis.</p> <p>Objective evidence: Training which covers applicable aspects of the RSPO P&C, i.e. policy on prohibiting retaliation against Human Rights Defenders, has not been effectively communicated to all levels of the workforce. There is negligible to minimum understanding of the Policy on prohibiting retaliation against Human Rights Defenders</p>	<p>Root Cause: Lack communication and awareness during the time of HRD was communicated.</p> <p>Correction: To conduct refresher training of RSPO/MSPO including the related policies for all levels of employee.</p> <p>Corrective action: Trainings should be done more frequently in smaller groups for effective communication. Updated internal procedure of communication of newly introduced IOM/SOP</p>	<p>Corrective action plan is accepted, and the implementation will be verified during next audit.</p> <p style="text-align: center;">Status: Closed</p>

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<p>3.3.2 MN 01 2021</p>	<p>Minor</p>	<p>in audit interviews of various levels of workforce.</p> <p>Finding: The mechanism to check consistent implementation of procedure Personal Protective Equipment (PPE) UM/HSE/OCP/03 2021 was not in place.</p> <p>Objective evidence: During the site visit at all estates, sighted all workers was wears appropriate PPE, however, site inspection at Nursery of Bayu Estate, it was found out that 5 out of 7 Nursery Workers were not wearing straw hats as procedure.</p>	<p>Root Cause: There was no PPE inspection done prior to commencement of work by the staff/ mandore in-charge. This indicates lack of awareness among the employees to safety & health at the estates.</p> <p>Correction: To ensure all workers have been provided with PPE and monitor compliance at work.</p> <p>Corrective action: Standardization of PPE checklists (daily) and reporting. Online apps for intervention of unsafe acts by the workers to promote awareness to safety & health at work.</p>	<p>Corrective action plan is accepted and the implementation will be verified during next audit.</p> <p>Status: Closed</p>
<p>2.1.2 DA 01 2021</p>	<p>Minor</p>	<p>Finding: The documented system for ensuring legal compliance was not in place.</p> <ol style="list-style-type: none"> 1) Refer to Occupational Safety and Health (Noise Exposure) Regulations 2019 Section 4 (1). This regulation gazette on 01/03/2019 and come into operation on 01/06/2019. 2) Sarawak Labour Ordinance (Chap 76) section 109 payment of wages. <p>Objective evidence: 1) The Noise Risk Assessment yet to be carried out for all estates until the audit process. The estates management only managed to get the quotation from Global Green OSH Services Sdn. Bhd. dated 27/10/2021.</p> <ol style="list-style-type: none"> 2) At Bayu Estates – Based on verification of pay slips October 21, September 21, August 21 and interview with contractor workers (KSG Enterprise) was informed they received the salary later than 7 days after the expiration of the wage period. 	<p>Root Cause:</p> <ol style="list-style-type: none"> (i) The NRA was planned in 2020 however, due to travel restrictions by the Sarawak Disaster Management Committee, trainers could not travel without undergoing mandatory quarantine for 14 days. (ii) The verification of legal compliance by the contractors have been done but yet to cover compliance on SLO. No checklist/guideline to check on the legality of salary payment (based on SLO) to contractors' workers <p>Correction:</p> <ol style="list-style-type: none"> (i) New quotation requested and plan for NRA to be conducted for all SRR estates in 2020. (ii) To inform contractors on the requirement to pay salary to their workers as per the SLO and ensure payment made accordingly starting January 2021. <p>Corrective action:</p> <ol style="list-style-type: none"> (i) To include NRA and its recommended actions into the OSH plan. (ii) To conduct monthly KPI monitoring to contractors as per the C&V SOP. (iii) To develop checklist for KPI monitoring 	<p>Corrective action plan is accepted and the implementation will be verified during next audit.</p> <p>Status: Closed</p>

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Attachment 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Spec. Major/ Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
<p>MYNI 2014 4.1.2 MN 01 2019</p> <p>MYNI 2019 3.3.2</p>	Major	<p>Finding: A mechanism to check consistent implementation of weed control as per Section 16 of Agricultural Reference Manual was not demonstrated.</p> <p>Objective evidence: We found that in field 99SA, 99SB and 98SL of Samudera estate, the interline were still covered with woody growth (<i>Clidemia hirta</i>).</p>	To request for approval of additional Budget to complete the required spraying works.	<p>During site visit at Harvesting Operation (BYE - Block 8, Block 64, SME – B99SA, B99SB, RJE – B2014A, B2013B), Circle Spraying Operation (SME – 21A, RJE – B202D) and Manuring Operation Block (Block 4, Block 71), sighted field condition was satisfactory maintained and no woody growth were observed. Inter line, harvesting path and palm circle free from any unwanted woodies or weeds.</p> <p>Status: Closed</p>

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Attachment 6 – Timebound Plan

Time Bound Plan of Sime Darby Plantation Berhad

SDP - RSPO Certification Status for Malaysia Operations (As at March 2021)

SOU NO	Name of SOU	Location	Date of Certification	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '10	
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	
3	Elphil	Sg Siput, Perak	18 Jun '11	
4	Flemington	Teluk Intan, Perak	5 Oct '11	
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	
5	Selaba	Teluk Intan, Perak	3 Mar '11	
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	
8	East	Carey Island, Selangor	19 May '10	
9	West	Carey Island, Selangor	19 May '10	
10	Bukit Puteri	Raub, Pahang	7 Jul '11	
11	Kerdau	Temerloh, Pahang	7 Jul '11	Jentar Estate has merged with Kerdau Estate and reported to the CB in March/April 2021.
12	Jabor	Kuantan, Pahang	7 Jul '11	
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	New Labu Estate has become a division of Labu Estate.
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	
15	Sua Betong	Port Dickson, Negeri Sembilan	18 Feb '14	Siliau Estate has now been merged into Salak Estate and Bradwall Estate.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '11	Sg. Gemas Estate has now been merged into Sg Senarut Estate.
17	Kempas	Jasin, Melaka	20 May '15	Serkam Estate, previously from SOU18(Diamond Jubilee) is now part of SOU 17(Kempas)
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	Serkam Estate, previously from SOU18(Diamond Jubilee) is now part of SOU 17(Kempas). Welch Estate, previously from SOU 19(Pagoh) is now part of SOU 18(Diamond Jubilee).
19	Pagoh	Muar, Johor	28 Jan '14	
20	Chaah	Chaah, Johor	18 Nov '10	
21	Gunung Mas	Kluang, Johor	19 May '10	SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bk Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been

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				incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018.
22	Bukit Benut	Kluang, Johor	5 Oct '11	SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2018.
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	
24	Hadapan	Layang-layang, Johor	29 Mar '11	
25	Sandakan Bay	Sandakan, Sabah	1 Oct '08	
26	Melalap	Tenom, Sabah	21 Jan '11	
27	Binuang	Kunak, Sabah	16 Jan '09	
28	Giram	Kunak Sabah	16 Jan '09	
29	Merotai	Tawau, Sabah	16 Jan '09	
30	Lavang	Bintulu, Sarawak	30 Dec '11	
31	Rajawali	Bintulu, Sarawak	30 Dec '11	
32	Derawan	Bintulu, Sarawak	30 Dec '11	
33	Pekaka	Bintulu, Sarawak	30 Dec '11	Status: withdrawn. 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 effective Dec 2017.
34	Bintang	Johor		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

SDP- RSPO Certification Status for Indonesia Operations (As at March 2021)

NO	Name of PT	Name of Mill	Location	Date of Certification	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	3-Jul-13	
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	

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5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	Recertification of Bebunga POM is in progress.
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	
7	PT BAHARI GEMBIRA RIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	Recertification of Pondok Labu POM is in progress.
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	Land legalisation process for 4152.70 ha is still in process. Sungai Jernih Estate and the KKPA Estates has undergone audit. Land legalisation process is still in process.
12 13	PT LAGUNA MANDIRI	RANTAU BETUNG	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11 1-April-14	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	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.

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16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	Land legalisation process for 308.35 ha is still in process.
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	
18 19	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU MANDAH	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16 1-April-14	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	Land legalisation process for East Est for 5815.64 ha is still in process. Land legalisation for Sei Mawang is still in process
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru Mill. 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
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	The properties was sold and currently SDP have no control in the management. A letter to RSPO Secretariat has been sent on 27 June 2019 on the confirmation of disposal of PT MAS and reported to Brusa Malaysia accordingly.

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SDP - RSPO Certification Status for NBPOL Operations (As At March 2021)

NO	Management Unit	Location	Date of Certification	Remarks
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Guadalcanal Province, Solomon Islands	18-Mar-11	
2	Milne Bay Estates (MBE)	Milne Bay Province, Papua New Guinea	15-Feb-18	
3	Poliamba (POL)	New Ireland Province, Papua New Guinea	19-Mar-12	
4	Ramu Agricultural Industries Ltd (RAIL)	Morobe Province, Papua New Guinea	5-Aug-10	
5	Higaturu Oil Palm (HOP)	Oro Bay Province, Papua New Guinea	1-Feb-13	
6	West New Britain (WNB)	Kimbe, West New Britain, Papua New Guinea	10-Sep-08	
7	Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Markham Farms	27 March 2020.	There is total area for NPP: 710.30 ha which is currently excluded from the certification scope until the NPP is approved.

SDP - RSPO Certification Status for Liberia Operations (As At March 2021)

NO	Management Unit	Location	Date of Certification	Remarks
1	Sime Darby Plantation (Liberia) Grand Cape Mount	Grand Cape Mount County	NA	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). http://www.simedarbyplantation.com/media/press-releases/sime-darbyplantation-completes-divestment-of-its-liberia-operations