



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

File Ref. : ES10170012

RSPO PUBLIC SUMMARY REPORT

CLIENT : SIME DARBY PLANTATION BERHAD – SOU 5 SELABA

PARENT COMPANY : SIME DARBY PLANTATION BERHAD

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

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

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

MAP : See Attachment 1

AUDIT DATE : 25th to 28th January 2022

DURATION : 12 auditor days

TYPE OF AUDIT : ☒ Annual Surveillance Audit No. 1 ☐ Recertification Audit

STANDARD : MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

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

VALIDITY OF RSPO CERTIFICATE : 03 March 2021 - 02 March 2026

The following attachments form part of this report:

Non-conformity Report(s) ☐

List of additional site(s) ☐

Report by Audit Team Leader

Name : Selvasingam T Kandiah

Signature :

Date : 21/02/2022

Acknowledgement by Client's Representative

Name :

Signature :

Date : 23/2/2022

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SUMMARY OF AUDITS

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

Annual Surveillance Audit 1				
On-site audit date	:	25 th to 28 th January 2022	No. of auditor days	: 12
Audit team	:	Selvasingam T. Kandiah (LA), Mohd Zulfakar Kamaruzaman, Mohd Ab Raouf Asis		
No. of major NCR	:	1	Indicator: Nil	Closing date : NA
No. of minor NCR	:	1	Indicator : Nil	
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees / Workers organizations	Settlers	Villagers / Local communities
		√	√	√
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
		√	√	√
		Indigenous people	Contractors	Others (Please specify)
		√	√	
Supply base sampled	:	Selaba POM, Bikam Estate, Cluny Estate.		
Changes since the last audit	:	The Manager of Cluny Estate Mr. Fazlysham Bin Abdul Majid has been transferred out and replaced by Mr. Ikram Bin Mohd Safian. The contact person is now the Senior Manager of Sabrang Estate, Mr. Francis Ng. He replaced the Mill Manager Mr. Mohd Asid Bin Mamat.		
Justification of audit planning	:	Selaba POM – 3 mandays has been located to cover all RSPO P&C MYNI and 1 mandays for SCCS Cluny Estate – 8 mandays for the estate to cover all relevant RSPO indicator such as verification of safety and health, environment, good agriculture best practices, Social, HCV TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.		
Name of peer reviewer	:	-		
Report approved by	:	Kamini Sooriamorthy	Approval date	: 21/2/2022

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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 during the on-site audit		Employees / Workers organizations	Settlers	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	:			
Name of peer reviewer	:	NA		
Report approved by	:		Approval date :	

Annual Surveillance Audit 3				
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	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	:			
Name of peer reviewer	:	NA		
Report approved by	:		Approval date :	

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SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	*Dec 2020 - Nov 2021	January 2022 December 2022			
Certified FFB Processed (MT)	**2,075.85	20,325.00			
Production of Certified CPO (MT)	**434.06	4,079.23			
Production of Certified PK (MT)	**103.79	1,006.09			
Certified Areas (Ha)	1,549.75	1,549.75			
Planted Areas (Ha)	1,282.00	1,282.00			
Production Areas (Ha)	1,085.28	983.14			
HCV Areas / Conservation Areas (Ha)	6.49	6.49			
REMARKS	<p>ASA 1: *Actual reporting period: Dec 2020 – Dec 2021 **Lower certified crop production (and lower certified CPO & PK) as this has been based on the projected production from the only ONE estate in Selaba CU, which is Cluny Estate.</p>				

TABLE 2

	PO	PK
**Last years certified volume (MT)	**21,906.23	**5,281.09
Last years actual certified sold (MT)	16,943.19	4,095.50
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	0.00	0.00
Last year actual sold CSPO credits (where applicable)	0.00	0.00
New year certified volume (MT)	4,079.23	1,006.09

***With reference to the extension of volume applied and approved by RSPO in July 2021.*

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1.0 AUDIT PROCESS

1.1 Certification Body

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

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Selvasingam T Kandiah	Lead Auditor Safety, GAP, TBP	Holds a B. Sc. (Hons) in Agriculture. He had worked as a planter with Kumpulan Guthrie Berhad before retiring including in Liberia. He has more than 29 years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C & MSPO.
Mohd Zulfakar bin Kamaruzaman	Auditor / Supply Chain, Social, HCV	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C and RSPO Supply Chain.
Mohd Ab Raouf Bin Asis	Auditor Env,GHG, Metric Template	Holds a B. Sc. UHTM in Manufacturing (Production and Operation). He had more than 7 years of working experience in the oil palm operation. He has experience in auditing since 2016. He was successfully attended Quality Management System (ISO 9001:2015) and OHS 18001:2007 lead assessor course in 2016.

1.3 Audit methodology

The audit covered the Selaba palm oil mill and its one (1) supply base. The sampling methodology applies for supply base with higher than four estates. The sampling shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The sole supply base covered during the audit is Cluny Estate. The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

SIRIM QAS International had sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs). 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 (local / foreign / Orang Asli workers / male & female)	<p>Workers:</p> <ul style="list-style-type: none"> a. Workers work 6 days a week with one rest day (Sunday). They work 8 hours with a minimum of 30 minutes' break in between. b. All workers sampled confirmed that they received the minimum wage. They receive their salaries before 7th of every month. As of the date of this audit, all sampled workers understood on Minimum Wages. c. Any overtime work is mutually agreed between workers and management, and that there is no element of forcing. d. Foreign workers are not subjected to any recruitment fee. Foreign workers who choose to keep their passports at the office have done so with their written consent. e. Workers are generally satisfied with the way complaints lodged are acted upon. Delays in house repairs, if any, are usually due to the need to order repair parts. f. Workers, including foreign workers get to appoint their own representatives. There is no interference of influence exerted by the employer. g. For newly arrived foreign workers who do not understand Bahasa or English, translations are provided during briefings.
2) Settlers	Not applicable.
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> a. Jawatankuasa Pengurusan Komuniti Kampung (JPKK) from Kg Glouster Batu 6, Kampung Selabak Dalam, Kg. Pekan Trolak, Kg Rasau b. No land claims/disputes and no social issues. Harmonious co-existence.
4) Suppliers	Fair dealings with the SOU. Payments are made within 1 month of Invoice.
5) Contract workers (local / foreign / Orang Asli workers / male & female)	At time of visit there were no contract workers.
6) Local & national NGOs	Not available for this audit.
7) Government agencies / Statutory bodies	Not available for this audit.
8) Independent growers / Smallholders	<ul style="list-style-type: none"> a. No complaints. b. Fair & timely payments for FFB supplied.
9) Indigenous people	Tok Batin from Kg Sungai Bill and Tok Batin Kuala Bill (through phone call but not details as Tok Batin in a hurry for meeting with JAKOA). No land issues.

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10) Contractor	No issue raised. Payments are received in time.
11) Previous land owner (if any)	No issues
12) Others (please specify)	No issues

1.5 Audit plan : Refer to Attachment 2

1.6 Date of next audit : The next surveillance audit will be conducted within 12 months but not sooner than 9 months from this audit. (For RA, the next RA will be conducted at least 4 months prior to expiry date of the certificate)

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

Selaba POM has a processing capacity of 40 metric tons of FFB per hour. Cluny Estate is the only supply base under SOU Selaba. Selaba POM depends on crop diverted from neighboring CU and outside crop. Cluny Estate has been fully developed before the year of 2005. Hence, there is no New Plantings in Cluny Estate. Selaba CU is also certified with MSPO certification.

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

The FFB sourced from company own estates that are certified and third parties which are not certified. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

Table 1: Actual FFB production by the supply base for the last reporting period (Dec 2020 to Dec 2021)

Estates	FFB Production	
	Tonnes	Percentage (%)
Cluny Estate	7,814.39	9.30%
Seri Intan Estate	18,174.86	21.63%
Sabrang Estate	14,093.17	16.78%
Sg Wangi Estate	8,739.25	10.40%
Bikam Estate	8,089.47	9.63%
Bagan Datoh Estate	4,994.59	5.95%
Flemington Estate	3,921.37	4.67%
Sg Samak Estate	2,406.64	2.86%
Sogomana Estate	5,938.21	7.07%
Sabak Bernam Estate	9,835.51	11.71%
Sub-total certified	84,007.46	48.41%
Third party (non-certified)	89,519.09	51.59%
GRAND TOTAL	173,526.55	100%

Table 2: Projected FFB production by supply base for the next reporting period (Jan 2022 to Dec 2022)

CU own estates	FFB Contribution	
	Tonnes	Percentage (%)
Cluny Estate	20,325.00	
Total	20,325.00	12.15
Other Supply Bases	26,924.30	16.10
Third parties (non-certified)	120,000.00	71.75
Grand Total	167,249.30	100.00

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**Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period
(Dec 2020 to Dec 2021)**

	Total (MT)
FFB Received	173,526.55
FFB Processed	173,526.55
FFB Certified	84,007.46
CPO Production	35,022.09
CPO MB-Certified	16,954.85
PK Production	8,499.69
PK MB-Certified	4,114.86
CPO delivered as Mass Balance	16,943.19
CPO delivered as non-RSPO certified	0.00
PK delivered as Mass Balance	4,095.50
PK delivered as non-RSPO certified	0.00
Product sold under Book & Claim	NA

**Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period
(Jan 2022 to Dec 2022)**

	Total (MT)
FFB Received	167,249.30
FFB Processed	167,249.30
FFB Certified	20,325.00
CPO Production	4,079.23
PK Production	1,006.09

Table 5 Planted and certified area of the CU

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

Table 6 Planting profile for xx CU

<u>Estate</u>	<u>Year of planting</u>	<u>Planting Cycle</u>	<u>Mature (Ha)</u>	<u>Immature (Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Cluny	1998	1	86.56		86.56	6.75	
	1999	1	61.37		61.37	4.79	
	2000	1	230.12		230.12	17.95	
	2001	2	42.55		42.55	3.32	
	2005	2	33.18		33.18	2.59	
	2008	2	53.02		53.02	4.13	
	2012	2	66.93		66.93	5.22	
	2013	2	78.46		78.46	6.12	
	2015	2	98.92		98.92	7.72	
	2016	2	111.36		111.36	8.69	
	2017	2	120.67		120.67	9.41	
	2019	2		205.97	205.97		16.07
	2020	2		92.89	92.89		7.24
Total			983.14	298.86	1282	76.69	23.31

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2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Francis Ng
Position	:	Senior Manager
Address	:	Sabrang Estate 36009 Teluk Intan, Perak
Phone no.	:	05-6221422 / 019-7129030
Fax no.	:	05-6216834
Email	:	Ldg.sabrang@simeidarby.plantation.com

3.0 AUDIT FINDINGS

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

3.1

None

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 for Principles
& Criteria June 2017, in this report

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

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

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.)

The Manager of Cluny Estate Mr. Fazlysham Bin Abdul Majid has been transferred out and replaced by Mr. Ikram Bin Mohd Safian.

The contact person is now the Senior Manager of Sabrang Estate, Mr. Francis Ng. He replaced the Mill Manager Mr. Mohd Asid Bin Mamat.

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3.4 Status of previous non-conformities *

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

☒ Closed

☐ Not closed*

3.5. Complaint received from stakeholder (if any)

No significant complaints from stakeholders were observed

4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s)
(details refer to Attachment 3) List : Nil

Total no. of major NCR(s)
(details refer to Attachment 3) List : Nil

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

Total no. of minor NCR(s)
(details refer to Attachment 3) List : Nil

Total no. of major NCR(s)
(details refer to Attachment 3) List : Nil

5.0 AUDIT CONCLUSION

The audit team concludes that the organization has / ~~has not~~* established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.

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6.0 RECOMMENDATION



No NCR recorded. Recommended to continue certification.



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

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



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



Recommended to continue certification.



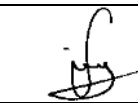
Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.

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 : Selvasingam T Kandiah

(Name)



(Signature)

-

(Date)

Attachment 1 - Map

Map of SOU 5 Selaba



RSPO Surveillance Audit Plan ASA1

1. Objectives

The objectives of the audit are as follows:

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

2. Date of assessment : 25th to 28th January 2022

3. Site of assessment : SOU 5 Selaba Certification Unit

- Selaba Palm Oil Mill
- Cluny Estate

4. Reference Standard:

- a. MYNI 2019 of RSPO P&C 2018
- b. RSPO Certification Systems Documents; Nov 2020
- c. Company's audit criteria including Company's Manual / Procedures

5. Assessment Team

- a) Trainer Lead Auditor : Selvasingam T Kandiah (GAP, Safety TBP)
- b) Auditors : Mohd Zulfakar Kamaruzaman (Social, HCV, SC)
: Mohd Ab Raouf Asis (Env,GHG, Metric Template)
- c) Observer : Nil
- d) Technical Expert : Nil

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

6. Audit Method

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

7. RSPO 2018 Principles and Criteria (P&C) Metrics Template

The RSPO 2018 Principles and Criteria (P&C) Metrics Template outlines a set of strategic outcomes based metrics relating directly to the RSPO P&C and is aligned with the RSPO Theory of Change. This Metrics Template came 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 & Auditor En. Raouf according to this period:

- a) Reporting time frames for economic data are:
 - i. Calendar year (January to December): **January 2021 to December 2021**, and
 - ii. 12 months 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 2021**
- ii. For smallholders and outgrowers: **January 2021 to December 2021**
- c) Reporting time frame for all other social and environmental data:
 - i. January 2021 to December 2021**

The updated Metrics Template (as attached, the version 2.0) was enforced from 1 August 2021

8. Audit Findings

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

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

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

9. Confidentiality Requirements

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

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

10. Working Language:

English and Bahasa Malaysia

11. Reporting

- (i) Language : English
- (ii) Format : Verbal and Written
- (iii) Expected date of issue : 2 weeks after the closure of the Major NC / or if only minor NC, 30 days from the last day of this audit.

12. Facilities Required

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

13. Assessment Programme Details : As below

Day 1: 25/01/2022

Time	Activities / areas to be visited			Auditee
8.30am	Opening Meeting – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.			
8.45am	Briefing on the organization background and implementation of RSPO at CU (including actions taken to address previous audit findings) by company Management Representative. Logistics discussion to the sites to be visited.			Management Representative
9.20am	To assign each audit team members – site and the P&C requirements			
	Selvasingam (SPOM)	Zulfakar (SPOM)	Ab Raouf (SPOM)	
	Site visit and assessment on implementation at Mill: <ul style="list-style-type: none"> Internal Audit Management Review Traceability Milling Practices Occupational safety & health aspects, chemical management 	Site visit and assessment on implementation at Mill: <ul style="list-style-type: none"> Laws and regulations Land titles and user rights Social aspects - SIA, management plan & implementation, workers' quarters. Interview with employees, gender committee, worker representative, union representative, etc Linesite inspection Complaints and grievances HCV management SC requirements 	Site visit and assessment on implementation at Mill: <ul style="list-style-type: none"> Laws and regulations Environment and chemical management Interview with employees, contractor Schedule waste GHG Metric Template 	Guide(s) for Each Auditor
13.00pm	LUNCH BREAK			All
14.00pm	Continue assessment	Continue assessment	Continue assessment	Guide(s) for each auditor
17.00 - 18.00pm	Audit team discussion / End of Day 1 audit			All

Day 2: 26/01/2022

Time	Activities / areas to be visited			Auditee
8.30am	To assign each audit team members – site and the P&C requirements			
	Selvas (Cluny Estate)	Mohd Zulfakar (SPOM)	Ab Raouf (SPOM)	
	Site visit and assessment on implementation <ul style="list-style-type: none"> Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, IPM New planting Occupational safety & health aspects, chemical management Laws and regulations Interview with workers, contractors etc. 	Site visit and assessment on implementation at Mill: <ul style="list-style-type: none"> Linesite inspection Complaints and grievances HCV management SC requirements 	Site visit and assessment on implementation a <ul style="list-style-type: none"> Environment & chemical management Environment management Waste Management Laws and regulations GHG Metric Template plantation boundary, adjacent and neighbouring land use, riparian zone 	Guide(s) for Each Auditor
13.00pm	LUNCH BREAK			All
14.00pm	Continue assessment	Continue assessment	Continue assessment	Guide(s) for each auditor

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17.00 - 18.00pm	Audit team discussion / End of Day 2 audit	All
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Day 3: 27/01/2022

Time	Activities / areas to be visited			Auditee
8.30am	To assign each audit team members – site and the P&C requirements			
	Selva (Cluny Estate)	Zulfakar (Cluny Estate)	Raouf (Cluny Estate)	
	Site visit and assessment on implementation <ul style="list-style-type: none"> • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, • IPM • New planting • Occupational safety & health aspects, chemical management • Laws and regulations • Interview with workers, contractors etc. 	Site visit and assessment on implementation <ul style="list-style-type: none"> • HCV management • Forested area, plantation boundary, adjacent and neighbouring land use, • Land titles and user rights • Laws and regulations • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the mill • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc 	Site visit and assessment on implementation <ul style="list-style-type: none"> • Environment & chemical management • Environment management • Waste Management • Laws and regulations • GHG • Metric Template • plantation boundary, adjacent and neighbouring land use, riparian zone 	Guide(s) for Each Auditor
13.00pm	LUNCH BREAK			All
14.00 pm	Continue assessment			
17.00 - 18.00pm	Audit team discussion / End of Day 3			All

Day 4: 28/01/2022

Time	Activities / areas to be visited			Auditee
	Selva (Cluny Estate)	Zulfakar (Cluny Estate)	Raouf (Cluny Estate)	
8.00am	Overview of current activities of CU by audit team			Client representative
9.20am	Site visit and assessment on implementation <ul style="list-style-type: none"> • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, • IPM • New planting • Occupational safety & health aspects, chemical management • Laws and regulations • Interview with workers, contractors etc. 	Site visit and assessment on implementation <ul style="list-style-type: none"> • HCV management • Forested area, plantation boundary, adjacent and neighbouring land use, • Land titles and user rights • Laws and regulations • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the mill • Interview with gender committee, safety 	Site visit and assessment on implementation <ul style="list-style-type: none"> • Environment & chemical management • Environment management • Waste Management • Laws and regulations • GHG • Metric Template 	Guide(s) for each auditor

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		committee, worker representative, contractors, supplier, etc		
13.00pm	LUNCH BREAK			All
14.00pm	Verification on outstanding issues for CU Continue Audit Team discussion and preparation of assessment findings.			All Auditors
16.00pm	Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager			Auditors, Mill and Plantation / Scheme Managers
16.00 – 17.00pm	Closing meeting at Cluny Estate			All

**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	Selaba POM and Cluny Estate made available documents specified in the RSPO P&C to the public. These documents are either available via the Company's website www.simedarbyplantation.com , or available at the office, or can be accessible at each operating unit.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	The information is provided in Bahasa Malaysia, and some with English translation. This was evidenced from sighting of the documents. The information is usually provided during stakeholder consultation meetings. However, due to the Covid-19 pandemic in 2021, no physical stakeholder meeting was held. Instead, a letter containing a brief was sent to stakeholders either via email or normal post. The letter also sought feedback from stakeholders via an attached stakeholder feedback form.
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	The CU had identified personnel responsible for handling of complaints. Records of communication were identified and maintained in different files, internal & external communication, depending on the stakeholder. Among the records inspected were correspondences with the authorities, local communities and employees.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	Sime Darby Plantations Berhad has developed an SOP known as Consultation and Communications procedures documented in the Standard Operating Manual (Version 1 Year 2008) dated 1 April 2008 entitled "Procedure for External Communications". An examination of the records kept in the internal and external communication files found that the estate and mill followed the procedures and manuals developed by the company. In the case of internal communications, records of meetings, briefings and memos were sighted. Notices and posters / pamphlets observed displayed on notice boards at the office and the muster ground were also used as a means of internal communication.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	Reviewed during the audit were stakeholder lists for Selaba POM and Cluny Estate. This list contains relevant stakeholders and their contact details such as email and postal addresses, telephone numbers and nominated representatives.
1.2 The unit of certification commits	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including	YES	Units within the SOU 5 Selaba subscribes to the Sime Darby Plantations Group's Code of Business Conduct (COBC). This Code applies to all its employees, counterparts, business partners, affiliates and associates. Among the contents of the COBC include

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Clause	Indicators	Comply Yes/No	Findings
to ethical conduct in all business operations and transactions.	recruitment and contracts.		avoiding conflict of interest, guarding against bribery and corruption, ethics on gifts and corporate hospitality, donations and sponsorships, dealing with counterparts and business partners, government agencies and public officials. All levels of employees are required to sign a COBC personal pledge.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	Among the system in place to monitor compliance with of the COBC include: 1. Internal audits conducted by Group Integrity Governance Assurance Department; 2. Tender awards to be decided by tender committee to ensure independence and transparency.

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	In general, SOU Selaba has continued to comply with all applicable local, national and ratified international laws and regulations.
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	YES	SOU Selaba have identified, documented and maintained their legal register with written information on legal requirements which related to their operation in legal register entitled "Legal Requirement Register" File 2 (F23). Sime Darby headquarters, certification & compliance units were responsible to track changes and the information was disseminated to all its plantations and Mill department. The acts and its regulations were evaluated for compliance annually.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	YES	In general, the mill and estate boundaries were generally demarcated. Boundary lines were indicated on the maps. The locations of boundary stones were also indicated in the estate maps.
2.2 All contractors providing operational services and	2.2.1 A list of contracted parties is maintained.	YES	The list of stakeholders for SOU 5 Selaba are maintained and made available during the audit. The stakeholders list at Selaba POM and Cluny Estate are include the contractors, vendors, neighbouring estates/smallholders, villagers and government agencies with latest review in Sept 2021.

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Clause	Indicators	Comply Yes/No	Findings
supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements as verified through Online Vendor Registration (OVR) and the Vendor Code of Business Conduct (VCOBC) which apply to all contractors for due diligence and meeting legal requirements.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	YES	All sampled contracts contain a provision which refers to compliance with Sime Darby's Policies which include its Human Rights Charter Revised 2020 (HRC 2020). Clause 3.2.1 of the HRC 2020 states its respect for rights of workers, by eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking. 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	Selaba POM is currently have the report for the following for the directly source of FFB: <ol 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 MPOB License The evidence of currently document in is available in the RESPONSIBLE SOURCING GUIDELINE (RSG) BASELINE ASSESSMENT REPORT and Desktop Assessment for New OCP Suppliers and Land Title for all the directly source FFB also verified by the auditor. RSPO has provided the timeline which is 1 year from date of launch of MYNI for the mill to obtain and compile the information above.
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	YES	Selaba POM is currently have the report for the following for the indirectly source of FFB: <ol style="list-style-type: none"> Information on geo-location of FFB origins (radius 50 km). Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder MPOB License for traders and OCP supplier The evidence of currently document in is available in the Ground Truthing Assessment for New OCP Suppliers for KKS Selaba and Land Title for all the indirectly source FFB also verified by the auditor. RSPO has provided the timeline which is 1 year from date of launch

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Clause	Indicators	Comply Yes/No	Findings
			of MYNI for the mill to obtain and compile the information above.

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	YES	The Selaba SOU continued to make commitment to long-term economic and financial viability. The annual budgets for 2022 to 2026 which included Capital and Operating Expenditures in addition to FFB yield/Ha, OER and CPO were sighted. The budget provisions cover activities for machinery and plant upkeep, expenditure for mature and immature oil palm upkeep, harvesting and evacuation, welfare, capital expenditure and RSPO compliance.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	The long-range replanting programme (LRRP) until 2026 was sighted. This programme is reviewed once a year and is incorporated in the estate's annual financial budget.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	The management review meetings for SOU Selaba were held at the respective sites, in Nov 2021 for POM and Oct 2021 for Cluny. The meeting chaired by the Manager was attended by executives and staff and the management had highlighted the positive and negative impact based on internal audit conducted in Sept 2021.
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	The continuous action plan for Selaba POM and Cluny Estate are based on the issues identified in the Social Action Plans which are updated annually. The continuous improvement plans include annual maintenance of monsoon drains, ongoing monitoring of road conditions at workers' housing, etc. Management documents in relation to environmental plans and impact assessments implemented by the CU were made available and maintained at all audited operating units. The documents among others as listed below; a) Environmental Aspect Identification (EAI) and Environmental Impact Evaluation (EIE) registers b) Pollution Prevention Plan – FY2021/2022 c) Identification and Management of Wastewater d) Contingency plan during water shortage e) Water management plan

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Clause	Indicators	Comply Yes/No	Findings
operations.	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 RSPO metrics template is provided in this audit.
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	<p>SOU Selaba continued to use the documents established by the Sime Darby Plantation Bhd among others as follows;</p> <ul style="list-style-type: none"> a) Plantations / Mill Quality Management System (PQMS / MQMS). Manual b) PQMS / MQMS Standard Operating Manual and Procedures (SOP) c) Sustainable Plantation Management System (SPMS) Manual d) RSPO Supply Chain Manual e) ESH Management System Manual f) Occupational Safety and Health Manual g) Pictorial Safety Standards h) Laboratory Process Control Manual i) Security Guidelines. j) SOP for recruitment, selection and hiring of foreign workers k) SOP for hiring and selection of local workers l) SOP for promotion of workers m) SOP of Suara Kami Helpline 2020 <p>The Manuals are kept in the administration office to facilitate reference by any interested parties. Site inspection and interview with workers confirmed that the SOP had been implemented and the employees understood the requirements of the SOP. The procedures were communicated to workers through training and infield supervision. Interview with workers showed that the information in the procedures had been effectively communicated.</p>
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	SOU Selaba continued to implement the mechanism to ensure consistent implementation of operation as per SOPs. The mechanisms to check the implementation of procedures were carried out through RSPO/MSPO internal audit report, safety and health meeting and routine inspection (workplace inspection) by assistant manager, staff and hospital assistant. PA's report on visits made to Cluny Estate was made available to the auditors. PA visits have been discontinued on SDB plantations. The Group Corporate Assurance Department (GCAD).
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	Records of monitoring and the actions taken by the estate continued to be maintained and kept for a minimum of 12 months. Monthly Progress, Monthly Costing and Annual Reports on monitoring of all activities were made available during the audit as well as official monthly reporting to MPOB.

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Clause	Indicators	Comply Yes/No	Findings
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	The CU has also established its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) which covers from upstream activities such as FFB reception until downstream processes was sighted during assessment. Identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the significant environmental aspects are the boiler stack emission which is associated with air emission, palm oil mill effluent (POME) discharge (water pollution) and land contamination which related to the management of scheduled wastes and general waste. For estate operations, all activities from harvesting, pest and disease, upkeep program until delivery to mill have been identified.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	YES	A Social Impact Assessment (SIA) is available. This SIA was conducted on 24 Feb – 4 Mar 2014 by the Social and Environment Projects Unit, PSQM Department covering Selaba POM, Cluny Estate and Bikam Estate. All data has been gathered with the participation of external and internal stakeholders. The assessment has reported sampling and data collection procedure, demographic information, issues, complaints, suggestion from workers, interview with stakeholders (workers, union, contractors, suppliers, local community, local government and private bodies) and summary analysis. Records of meeting were documented, maintained by the CU and made available. Updates to the social action plan is being carried out annually after getting inputs from the meetings of the Gender Committee, NUPW and external stakeholders. .
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		Environmental management and monitoring plan were implemented at CU basis i.e established the ERP team to control the fire prevention. CU also conduct the stakeholder consultation on 23/11/2020 through invitation letter to comment for improvement of CU. As per to date no negative comment has been issued by stakeholder. All feedback form received stated positive comment for CU. <u>Selaba POM</u> During audit in Jan 2022, it was verified that social management plan was updating on issues on overtime issues, workers' amenities and challenged posed at the workers' housing by a resident's son. An email dated in Jan 2022 on special budget allocation on CAPEX for car porch (43 units of staff and workers housing involved). <u>Cluny Estate</u> During audit in Jan 2022, it was verified that social management plan was updating on workers' rights to adequate food and has provide new area.
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	YES	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and available as follows: a. SOPP Workforce Management Unit, which provides the procedures for recruitment, selection and hiring. It includes steps to be taken to ensure foreign

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Clause	Indicators	Comply Yes/No	Findings
	workers and their representatives where applicable.		<p>applicants with criminal record are filtered out:</p> <ul style="list-style-type: none"> b. Hiring and selection of local workers, which details out the procedure of fill up job application forms, screening, interview, and medical check-up. c. Employment contracts (for foreign workers) and letters of job offer (for local workers) document the termination procedures; d. Letters of job offer (for local workers) on retirement. Foreign workers is not subjected to retirement process because their employment would be dependant upon issuance of their annual work permits by the Immigration Department. e. Promotion is stipulated under SOP Doc No. SDP/HRUM/2020/SOP01.
	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	<p>All routine activities for mill and estate were adequately risked assessed. It covered including chemical usage, boiler operation, FFB sterilization, kernel extraction and oil extraction and clarification in the mill. Appropriate risk control measures had been determined and implemented for the respective activities and operation in the mill.</p> <p>As for mitigation, all the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative control was sighted with safety signages were displayed at all workstations including mill office and workshop. On overall performance, OSH administrative controls implementation as well as appropriate risk control measures were identified, and a PIC was assigned to monitor the implementation of the control measures during field and site assessment.</p>
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	<p>The effectiveness of implementation health & safety plan has been monitored by daily basis. All the precaution i.e. safety signboard, pictorial safety standards, PPE, etc has been published and display at workplace areas (notice board, muster call, etc). CU also monitored safety risk in workplace operation by monthly basis. Sighted evidence of workplace inspection has been carried out on before each OSH meetings.</p> <p>Note that at Selaba POM the HIRARC document was reviewed in Oct 2021 due to accident i.e., hurt on right hand by falling branch while trimming a tree.</p>
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are	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	YES	Formal training programmes for 2022 that covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs were presented to auditors by both Cluny Estate and mill. The training programmes were also extended to contractors and suppliers. Trainings were either conducted internally by its own staff or by other department within the Sime Darby Group or consultant.

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Clause	Indicators	Comply Yes/No	Findings
appropriately trained.	P&C, in a form they understand, and which includes assessments of training.		
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	Records of training had been maintained by both Estate and Mill.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	YES	Appropriate training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been conducted in June 2021 for 7 person including PIC, Clerk, Assistant Engineer, Staff, Weighbridge Operator and transporter.

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.	NA	Not applicable since Selaba Mill is MB
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those	YES	SPOM decided to maintain the MB model for their supply chain system. Therefore, they are being audited against the general chain of custody requirement for the supply chain as well as Module E - CPO Mills: Mass Balance. SPOM obtained certified FFB from both certified and non- certified supply base (sample as listed below). SPOM also found to be aware of the downgrading procedure.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings																																
	from its own and 3 rd party certified supply base.		<table><tr><th>List of certified supply base</th><th colspan="2">List of non- certified supply base</th></tr><tr><td>Bikam Estate</td><td>Anson Oil</td><td>Liang Pang</td></tr><tr><td>Cluny Estate</td><td>Gan Kim Teik & Sons Sdn Bhd</td><td>Macro Sawit</td></tr><tr><td>Seri Intan Estate (Selaba Division)</td><td>Ladang Moccis</td><td>Menara Emas</td></tr><tr><td></td><td>Perniagaan Sinaran Mewah</td><td>Sawit Berkat</td></tr><tr><td></td><td>Sawit Berkat (Langkap) Sdn Bhd</td><td>Law & Yap</td></tr><tr><td></td><td>VR Plantation</td><td>Ban Boon Teng</td></tr><tr><td></td><td>Chuan Soon</td><td>Green Agro</td></tr><tr><td></td><td>Setia Station</td><td>Hiap Thye</td></tr><tr><td></td><td>Bagan Pasir</td><td>Kuala Perak</td></tr></table>			List of certified supply base	List of non- certified supply base		Bikam Estate	Anson Oil	Liang Pang	Cluny Estate	Gan Kim Teik & Sons Sdn Bhd	Macro Sawit	Seri Intan Estate (Selaba Division)	Ladang Moccis	Menara Emas		Perniagaan Sinaran Mewah	Sawit Berkat		Sawit Berkat (Langkap) Sdn Bhd	Law & Yap		VR Plantation	Ban Boon Teng		Chuan Soon	Green Agro		Setia Station	Hiap Thye		Bagan Pasir	Kuala Perak
List of certified supply base	List of non- certified supply base																																		
Bikam Estate	Anson Oil	Liang Pang																																	
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	Perniagaan Sinaran Mewah	Sawit Berkat																																	
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	Chuan Soon	Green Agro																																	
	Setia Station	Hiap Thye																																	
	Bagan Pasir	Kuala Perak																																	
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	Details as in Table 3 of this report. This has been made available, as in Table 4 of this report.																																
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	YES	The mill was observed to have met with registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information were: Name: Selaba Oil Mill – Sime Darby Country: Malaysia Member ID: RSPO-PC 00110 Member Category: Oil Mil Products: CPO & Palm Kernel Program: MB																																

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard. <p>The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	YES	<p>Selaba POM had revised their documented procedure title 'Standard operating procedure for Sustainability Supply Chain and Traceability'. The procedure described the following:</p> <p>Clause 4.0 ~ the responsibility of for the implementation of RSPO SCC i.e. head of operating unit</p> <p>Clause 5.0 ~ Control of document & records such as weighbridge tickets, consignment note, training record & contracts. Record retention for 10 years. Define the critical control point (CCP): estate – weighbridge, mill – weighbridge, admin office, ramp, CPO despatch area, CPO storage tank. Kernel silos.</p> <p>Clause 6.0 ~ Delivery of FFB from the estate – relevant record involved, flowchart for crop diversion, list of mill and their supply chain model i.e. IP or MB</p> <p>Clause 7.0 ~ Receiving FFB at the mill – list of supply base, rules for determining diverted FFB destination, relevant record</p> <p>Clause 8.0 ~ Production of ISCC certified Waste/Residues – Follow SOP Separate Oil Recovery System</p> <p>Clause 9.0 ~ Process monitoring – for IP model mill need to ensure no mixing of RSPO certified and non-certified</p> <p>Clause 10.0 ~ CPO and PK despatch – [Clause 9.1] all delivery of CPO and PK shall be in accordance with the contract allocated by Global Trading & Marketing (GTM) department</p> <p>Clause 11.0 ~ Non-conforming material / product – requirement to downgrade the RSPO Product</p> <p>Clause 12.0 ~ Product claim – shall follow RSPO rules on market communication & claim</p> <p>Clause 13.0 ~ Outsourced contractor - the mill has established list of outsourced contractor. Sighted list of transporter for CPO and PK.</p> <p>Clause 14.0 ~ Training – the mill shall provide training for relevant personnel carrying the task at tech critical control point (CCP).</p> <p>Clause 15.0 ~ Reclassification of mill's supply chain model - Reclassification of mill's supply chain model may be determined by GTM/ PSQM. CB shall be notified. All communicated shall be recorded.</p> <p>Clause 16.0 ~ Production volume</p> <p>Clause 17.0 ~ Conversion Factors</p> <p>Clause 18.0 ~ Internal Audit</p> <p>Clause 19.0 ~ Complaints</p> <p>Clause 20.0 ~ Management Review</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Effectively implements and maintains the standard requirements within its organisation. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports. 	YES	<p>As describe under para 18.0 SOP for sustainable Supply Chain and Traceability, SPOM refer to Internal Audit Procedure which is follow the RSPO Supply Chain Certification Standard Revision 2017 requirements.</p> <p>Internal Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2017 requirements.</p> <p>RSPO internal audit was conducted in Sept 2021 by a group of internal auditors. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 1 Major NCR were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
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	<p>SPOM had continued to receive certified FFB from own Estate Which is Cluny Estate diversion certified crop from another SOU. And Uncertified FFB from Surrounding Smallgrower and Small holder which is 22 suppliers. The validity of the certificate of the supplier has been checked accordingly. Sighted sample FFB consignment note for Cluny, Seri Intan Estate, Sabrang Estate, Sg Wangi Estate, Bikam Estate, Bagan Datoh Estate, Flemington Estate, Sg Samak Estate, Sogomana Estate, Sabak Bernam Estate for the month of December 2020 – December 2021. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Monitoring records titled as <i>“RSPO & MSPO Mass Balancing Records for Oil Mills”</i> has recorded the tonnage of certified FFB and its supplying estate.</p> <p>SOU Selaba has a mechanism in place for handling non-conforming oil palm products and/or documents as describe under para 11.0 (non-confirming products and/or Documents) SOP for Sustainable Supply Chain and Traceability.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
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> <ul 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	<p>Documented procedures related to sales and goods out were sighted and found adequate. Based on verification during the audit, SPOM has yet to deliver certified materials to end buyer. Therefore, following are sample of non- certified CPO & PK sales which comply to standard requirement except for the notation of Supply Chain model applied & Supply Chain certificate number. For future certified transaction, SPOM will be indicating the 2 items in weighbridge dispatch ticket.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	YES	<p>There are 1 outsource company CPO transporter. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training dated 5/11/2020 for transporter contractor was sighted by the auditor. There is contract document between Selaba POM and the transporters. At clause 5 (d) in the agreement stated that the contractor permit the certification bodies (CBs) appointed by the Company to conduct audit on its or its sub-contractor operations and provide access to all relevant systems, documents and records when requested by the CB.</p>
3.8.10	<p>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.</p>	YES	<p>List of contact person for both transporters were made available and up-to-date in the stakeholder list. And was updated as of Sept 2021.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	YES	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	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.
	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	YES	Relevant record was maintained for more than 2 years as per Standard operating procedure for Sustainability Supply Chain and Traceability.
	iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	YES	Selaba POM has maintained the Real Time basis accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record titled as “ <i>RSPO Records for Oil Mills</i> ”.
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass	YES	The records of the volume purchased (input) and claimed (output) over a period of 12 months was updated in ‘RSPO Records for Oil Mill’.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	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.)		
3.8.13	Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	YES	Selaba POM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER). These figures were monitored on daily & monthly basis by the mill using the prepared template (e.g. Monthly Production Report – Physical Movement) to ensure their accuracy as well as monitoring of their ongoing performance.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	YES	
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	YES	Not Applicable since this mill is MB Mill
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date	YES	Documented procedures related to sales and goods out were sighted and found adequate. The requirement of sales & goods out especially on notation of applicable Supply Chain model & Certificate number being complied by indicating in weighbridge dispatch ticket. The registration of transaction being carried out by Group Plantation Marketing subordinate. Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform		
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	YES	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Selaba POM has not use RSPO corporate logo as well as trademark logo.

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 exists in Sime Darby Plantation's Human Rights Charter Revised 2020 (HRC 2020). The scope of this HRC 2020 encompasses workers (men, women, migrant, trans-migrant, contract and casual), employees (all levels of the organisation) and parties and communities surrounding SDP operations. The commitments under the HRC 2020 include engaging and empowering local communities, respect and uphold labour rights, respect and uphold children's rights, protection of human rights defenders, whistle blowers, complainants, and community spokespersons. Among others, the HRC 2020 is states the Company's commitment to safeguarding the confidentiality of those involved.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	Based on documentation reviewed, interviews conducted, and observations made, there is no evidence of any instigation of violence or use of any form of harassment within the certification unit.

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Clause	Indicators	Comply Yes/No	Findings
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	YES	The system used by SOU 5a Selaba in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Procedures for handling Social Issues". Selaba POM and Cluny Estate each has its own Internal Complaint Book and External Communication Book. The Internal Complaint Book was used for employees to lodge complaint pertaining to their houses, and there is evidence that the complaints were resolved in a timely and appropriate manner. The external book was reviewed and found no complaints against the CU. 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 whistle blowers 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. Additionally, SDP has established Suara Kami Helpline. Suara Kami is an alternative independent third party worker grievance channel with multi-languages and multi-interfaces (toll-free number, SMS and Facebook) that assures worker confidentiality unless personal details are required, where in such situations, consent will be sought.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, incl. by illiterate parties.	YES	To ensure that illiterate parties also understand the procedures, verbal, practical demonstration and pictorial briefings are given are translated into the language the affected parties understand. This was confirmed by foreign workers interviewed at Cluny Estate and Selaba POM.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and comm to relevant stakeholders.	YES	There is evidence that parties to a grievance are kept informed of the progress of the complaints. This was done via progress meetings as evidenced via meeting with NUPW and management in October 2021.
	4.2.4 The conflict resolution mechanism incl. 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 3 rd party mediator.	YES	Paragraph 7 of Appendix 5 Sustainable Plantation Management System, Flowchart and Procedure On Handling Social Issues Version 1, states upon failure of negotiation process involving estate management, representatives from the disputed parties, zone heads, third parties and stakeholders, legal proceedings may follow. Paragraph 8 of Appendix 3 of 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." Therefore, the conflict resolution mechanism includes options to access independent legal and technical advice.

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Clause	Indicators	Comply Yes/No	Findings
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	YES	The main contribution to community development for both Selaba POM and Cluny Estate is the employment opportunities accorded to the surrounding communities, including the indigenous peoples, the Orang Asli. Another community contribution was the collaboration with Dept of Environment, Dept of Fisheries and Fishermen's Association in October 2020 where in conjunction with the World River Day celebration, 15,000 silver barbed fish were released in the river and 5,000 released at the HCV pond in Chersonese. The purpose was to populate the local river with local native species and to increase the economy of local fisheries.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a 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	Evidence of legal ownership of the land including history of land tenure was verified during this audit. The land was previous own by Golden Hope and after merged with Sime Darby, The Land Title was transferred under the name of Sime Darby Plantation Berhad. Each estate had legal use of the land through an Ownership and Country Lease signed by the Director of Lands and Surveys of Perak following the payment of premium and Land fee.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	As reported in 4.4.1 of this check list, it has been verified that the land is legitimately owned by SOU Selaba since 1985 The audit team had confirmed that there were no land issues related to previous owners.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	YES	
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or	YES	

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Clause	Indicators	Comply Yes/No	Findings
	withhold their consent to the operation at the time that these decisions were taken.		
	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 applicable, and relevant authorities).	YES	As reported in 4.4.1 of this check list, it has been verified that the land is legitimately owned by SOU Selaba since 1985 The audit team had confirmed that there were no land issues related to previous owners.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	There was no land encumbered by customary rights or dispute from any stakeholder at SOU Selaba, it was confirmed through interviewed with head of village/representative.
	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	As above.

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Clause	Indicators	Comply Yes/No	Findings
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	There was no land encumbered by customary rights or dispute from any stakeholder at SOU Selaba, it was confirmed through interviewed with head of village/representative.
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 5 Selaba and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by SOU Selaba. The audit team had confirmed that there were no land issues related to previous owners and it was confirmed through interviewed with head of village/representative.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Selaba. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. The audit team has also interviews with head of village/representative.
	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.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Selaba. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. The audit team has also interviews with villager representatives.

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Clause	Indicators	Comply Yes/No	Findings
	Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.		
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Selaba. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. The audit team has also interviews with villager representatives.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	YES	As above.
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	YES	As above.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	YES	As above.

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Clause	Indicators	Comply Yes/No	Findings
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 (Version 1) entitled "Procedures for Handling Boundaries Disputes". In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (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 were no scheme small holdings at Selaba SOU.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	YES	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System document issued (Version 1) entitled "Procedures for Handling Boundaries Disputes". In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation	YES	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighbouring estate. The audit team has also interviews with head of village/representative.

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Clause	Indicators	Comply Yes/No	Findings
relinquishment of rights, subject to their FPIC and negotiated agreements.	(monetary or otherwise) is in place and documented and made available to affected parties.		
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	It has been verified that the land is legitimately owned by SOU Selaba and all the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	YES	As above.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	YES	There was no land encumbered by customary rights or dispute from any stakeholder at SOU Selaba, it was confirmed through interviews with head of village/representative.
	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	YES	As above.

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Clause	Indicators	Comply Yes/No	Findings
	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).		
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities where applicable).	YES	As above.

Principle 5: Support smallholder inclusion

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Yes	Current and past prices paid for FFB were displayed at the weighbridge counter. Small holder agrees with price because the price is followed by the guidelines by MPOB. The Guideline for Price is printed from MPOB web site.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Yes	Sighted evidence training regarding price mechanism to the Outside Crop Producer (OCP) in June & Nov 2021.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	Fair pricing, including premium pricing is agreed with smallholders. Small holders agree with price because the price is followed by the MPOB Pricing Mechanism. The Guideline for Price is printed from MPOB web site.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance,	Yes	Fair pricing, including premium pricing is agreed with smallholders. Small holders agree with price because the price is followed by the MPOB Pricing Mechanism. The Guideline for Price is printed from MPOB web site.

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Clause	Indicators	Comply Yes/No	Findings
	loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.		
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	Interviews conducted with contractors and suppliers, They confirmed the fairness of the terms of their agreement, and payments are usually received within 7 to 10 days of invoice issuance.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	Interviews conducted with contractors and suppliers, confirmed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	SOU Selaba has continued to comply with all applicable local and national laws and regulations (Laws of Malaysia as Section 14(6) under Weights and Measures Act 1972) and were verified by Metrology Corporation Malaysia Sdn. Bhd.
	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. For the current practice SOU Selaba has invited the nearby smallholder Outside Crop Producer (OCP) to training and meeting regarding MSPO and RSPO. Sime Darby SOU Selaba has encourage the smallholder to certify with RSPO, but smallholder don't want to join due to financial constraint.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	Yes	A grievance mechanism which respects anonymity and protects complainants is in place at the SOU Selaba as per the SOM Procedure for External Communication, and as per SOP Carta Aliran Pengendalian Isu Sosial. The procedures have been communicated to all levels of workforce and to all contractors, to-date there is no complaint from stakeholders.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	YES	Sime Darby Plantation supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. For the current practice SOU Selaba has invited the nearby smallholder Outside Crop Producer (OCP) to training and meeting regarding MSPO and RSPO. Sime Darby SOU Selaba has encourage the smallholder to certify with RSPO, but smallholder don't want to join due to financial constraint.
	5.2.2 The unit of certification develops and implements smallholder support program	Yes	Sime Darby Plantation supports Independent Smallholders including women or other partners in their supply base with certification and implements smallholder support

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Clause	Indicators	Comply Yes/No	Findings
	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).		program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification. For the current practice SOU Selaba has invited the nearby smallholder Outside Crop Producer (OCP) to training and meeting regarding MSPO and RSPO. Sime Darby SOU Selaba has encourage the smallholder to certify with RSPO, but smallholder don't want to join due to financial constraint.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	For the current practice SOU Selaba has invited the nearby smallholder Outside Crop Producer (OCP) to training and meeting regarding MSPO and RSPO. Sime Darby SOU Selaba has encourage the smallholder to certify with RSPO, but smallholder don't want to join due to financial constraint.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Yes	For the current practice SOU Selaba has invited the nearby smallholder Outside Crop Producer (OCP) to training and meeting regarding MSPO and RSPO. Sime Darby SOU Selaba has encourage the smallholder to certify with RSPO, but smallholder don't want to join due to financial constraint.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Yes	Sime Darby Plantation supports Independent Smallholders including women or other partners in their supply base with certification. For the current practice SOU Selaba has invited the nearby smallholder Outside Crop Producer (OCP) to training and meeting regarding MSPO and RSPO. Sime Darby SOU Selaba has encourage the smallholder to certify with RSPO, but smallholder don't want to join due to financial constraint. SOU Selaba has regularly review and reports the progress if any of smallholder want to join the RSPO.

Principle 6: Respect workers' rights and conditions

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

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	YES	<p>The policy of Group Sustainability and Quality Policy Statement has been approved by Group Managing Director, Mohamad Helmy Othman Basha. The policy shall be guided by the commitments spelt out in the company's:</p> <ul style="list-style-type: none"> • Responsible Agriculture Charter (RAC) • Human Rights Charter (HRC) • Innovation & Productivity Charter (IPC) <p>Para 3.2.5 in the HRC clearly stated promoting 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</p>

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Clause	Indicators	Comply Yes/No	Findings
			membership, political affiliation or age. SDPB according to the statement, also will facilitate opportunities for advancement for their employees, especially women by removing barriers to progress and respecting reproductive and maternal rights.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Based on documentation reviewed such as employment contracts and letters of offer, pay slips, allocation of housing at the linesite and audit interviews, there is no evidence that local and foreign workers, women and local communities have been discriminated against.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	YES	Selaba POM and Cluny Estate were able to demonstrate that recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness appropriate for the job. Interview of candidates will be done by Manager and the Assistant Managers where an evaluation form is filled up to determine the suitability of the candidate. These documents are contained in the workers' personal files. A job application form was sighted, enclosed relevant school certificate, copy of MyKard, record of interview, medical examination, where they were certified fit for employment, record of induction training and the issuance of the employment letter.
	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	As of the date of this audit, and as confirmed by the Gender Committee chairpersons of both Cluny Estate and Selaba POM, as well as Medical Assistant at Cluny Estate and Health Assistant at Selaba Estate clinic, pregnancy testing is not conducted as a discriminatory measure and only carried out on a monthly basis on female workers whose job is in direct contact with chemicals and those carrying out work as sprayers and manurers. When confirmed pregnant, the said female worker would be assigned an alternative equivalent job. However, there was no record of any female workers who were pregnant during the past 12 months from date of audit, and so this aspect of the indicator could not be verified during this audit.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	A gender committee is in place throughout all the production units within SOU 5a Selaba. The gender committee comprise female employees of all levels, including wives of male employees. Among the activities carried out by the Gender Committee include training on sexual harassment, reproductive rights and opportunities to improve members' income.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	Based on letters of job offer and monthly pay slips reviewed, evidence is available that workers receive equal pay for the same work scope. At Selaba POM, fireman received daily rate pay equal among them. Similarly, at Cluny Estate, general worker received daily rate pay equal among them and same applies to the harvester.

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Clause	Indicators	Comply Yes/No	Findings
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	The employment contracts signed between the estate/mill management contain employment and payment terms and provisions covering duration of employment, place of work, salary, working hours, medical, accommodation, SOCSO, transportation, public holidays, sick leave, annual leave, mutual termination of service, etc. These are all in compliance with the provisions of the Employment Act 1955. The pay slip is the document that give accurate information on compensation for all work performed. It contains the following information: employee name, IC/passport, gang, month of pay, pay description, (basic, price bonus, productivity incentive, allowances, deductions for SOCSO, EIS (Employment Insurance System), KSWP, total income for the month, total deductions, net pay. None of the workers have family members working to help them with their work.
	6.2.2 (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 Employment Act 1955. The pay slip is the document that give accurate information on compensation for all work performed. It contains the following information: employee name, IC/passport, gang, month of pay, pay description, (basic, price bonus, productivity incentive, allowances, deductions for SOCSO, EIS, KSWP, total income for the month, total deductions, net pay. None of the workers have family members working to help them with their work.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	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 mill workers' employment contracts, punch cards and interviews with the workers themselves. They are also entitled to at least 30 minutes' rest after 5 hours of work. Similarly, workers with medical certificates are given a paid medical leave, and female workers are given 3 months maternity leave. There is no evidence of termination, and so compliance with reasons for dismissal and period of notice could not be verified during this audit. Salary deductions are made for statutory deductions such as SOCSO, EPF, and EIS. For non-statutory deductions such as for payment of electricity and water bills, records are available of written permits from the Department of Labour, Peninsular Malaysia.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or	YES	Evidence is available that Selaba POM and Cluny Estate provide adequate housing and facilities to its employees in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. Houses are provided rent free with free water and subsidized electricity. Each house has between 2 to 3 rooms and accommodate between 2 to 5 workers. The houses are generally in a good state of repair.

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Clause	Indicators	Comply Yes/No	Findings
	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.		Foreign workers are provided with accommodation as stated in their employment contracts. Local workers too are offered accommodation, but those who are within the local communities prefer to live outside the estate/mill premises. Among the available amenities include, badminton/takraw/volleyball court, children's playground, places of worship, sundry shops (Cluny Estate and Selaba POM) and an activity hall.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	All units have its own canteen and grocery store which sells basic items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within its expiry period. Workers interviewed informed that they purchase items from these stores, but also since the estate and mill are easily accessible to the nearest town, they also go out to the towns. Workers could either pay in cash, or on credit. The canteen operator at Selaba POM has a contract valid until 31 Dec 2023 to operate from Monday – Saturday (from 7.00AM to 6.00PM) and on Sunday (from 7.30AM to 3.30PM). Visit to the canteen and interviews conducted with the workers confirmed that food and drinks are sold at reasonable prices, as required under the contract.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following: <ul style="list-style-type: none"> An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to 	YES	All sampled workers receive at least minimum wages based on Minimum Wages Order 2020. Selaba POM and Cluny Estate had calculated the prevailing wages and in-kind benefits for their workers. The calculation included housing, electricity, water, transport to work, sports and recreation facilities, education, childcare and healthcare.

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Clause	Indicators	Comply Yes/No	Findings
	<p>workers.</p> <ul style="list-style-type: none"> • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. • The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>		
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	Based on documents sighted and interviews conducted, Cluny Estate and Selaba POM employ full-time employees. There was no casual, temporary or day labour employed as evidenced by documents sighted and interviews conducted with workers and management.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	YES	Recognition of freedom of association is available in SDP's Human Rights Charter 2020. Paragraph 3.2.4 states commitment to respect freedom of association, respecting the rights of employees to form and join unions and bargain collectively. And in jurisdictions where this right is limited, SDP we will provide alternative means of employee engagement and grievance redressal.
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers	YES	Records of meetings between NUPW representatives of Selaba POM and Cluny Estate management were made available and reviewed during the audit. These minutes were

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Clause	Indicators	Comply Yes/No	Findings
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.	representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.		prepared in Bahasa Malaysia, and made available upon request. As confirmed by the NUPW representatives from Selaba POM and Cluny Estate who were interviewed, their appointments were made after being freely elected by their co-workers.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	YES	Evidence was available that all worker representatives were freely appointed by the workers as confirmed by the NUPW representatives interviewed at Selaba POM and Cluny Estate.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and 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. This undertaking to not hire child labour is included in all service contracts and supplier agreements.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	YES	Documentary evidence is available that minimum age requirements are met. This is based on workers' check roll list and copies of their passport/NRIC details. Based on workers' NRIC and passports, all workers were at least 18 years old when employed.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements are met throughout Selaba POM and Cluny Estate. Personnel files reviewed contain copies of the workers' NRIC or passports with their respective pictures.
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	YES	Selaba POM was able to demonstrate communication about SDP's Human Rights Charter 2020 inside the briefing that was sent to its stakeholders.

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Clause	Indicators	Comply Yes/No	Findings
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	The formal Policy on prevention of sexual and other forms of harassment and violence exists in SDP's Human Rights Charter 2020. Paragraph 3.2.6 of the HRC Charter 2020 states that the Company would create a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. Based on interviews conducted with female workers at the Selaba POM and Cluny Estate, as well as with the Gender Committee members, this Policy is being implemented as they confirmed that there has been no violence of sexual harassment.
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	YES	The formal Policy on prevention of sexual and other forms of harassment and violence. Paragraph 3.2.5 states that the Company would facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. Based on interviews conducted with female workers at the Selaba POM and Cluny Estate, as well as with the Gender Committee members, this Policy is being implemented as they confirmed that their reproductive rights are assured i.e. freedom to plan their own family, paid maternity leave, right to take time off to nurse their child, and pregnant female workers are given light work.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	Based on interview conducted with the Gender Committee representatives, the needs of new mothers will be assessed using a form known as the "New Mother Assessment Form". However, during this audit, there has been no evidence of any new mothers and therefore this indicator could not be verified.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	YES	A grievance mechanism which respects anonymity and protects complainants is in place at the CU as per the Sime Darby Gender Committee Handbook 1st Edition 2014. Additionally, SDP has also established Suara Kami. According to the SOP for Suara Kami Helpline, this is an alternative independent third-party worker grievance channel with multi-languages and multi-interfaces (toll-free number, SMS and facebook) 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 fees 	YES	Selaba POM and Cluny Estate were able to demonstrate that all sampled workers have entered into employment voluntarily. Foreign workers (harvesters, sprayers, mill workers), are not subjected to contract substitution and no discriminatory practices against foreign workers was observed. This is based on the following: <ol style="list-style-type: none"> review of sampled employment contracts which contain mutually agreed termination clause; review of documents where workers signed consenting for their passports to be kept at the office; interview with foreign workers who confirmed they could have access to the passports at any time;

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Clause	Indicators	Comply Yes/No	Findings
	<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 		<ul style="list-style-type: none"> d. review of recruitment agency contract between Sime Darby Plantation Berhad and its employment agencies where no recruitment fee is payable by the workers and confirmed by the workers (except for passport, medical in and biometrics in home country). e. records of punch cards and workers confirmation that overtime work is mutually agreeable and not forced on them; f. confirmation from the foreign workers that they received accurate briefing in their home country on the job they would be doing in Malaysia; g. and confirmation from the workers that there is no debt bondage or 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	<p>Safety and Health Committee organization was established with Workers and Management representation. The Mill Manager was appointed as the Chairman of the ESH committee for the Mill, while the Estate Manager is the Chairman for the estate. The communication forum used through the safety meeting (mesyuarat j/kuasa keselamatan & kesihatan pekerjaan) apart from other dialogue session and briefing during the weekly gathering. The safety meeting is held every 3 monthly. The agenda discussed follows the guidelines provided by regional sustainability unit. Discussions as sighted in the minutes are bilateral involving participation from both employer and employees. Additional issue where deemed important by the committee are included in the discussion. The agenda discussed in the safety meeting among others are:</p> <ul style="list-style-type: none"> a) Workplace inspection (workplace inspection are conducted 1 week prior the safety meeting) b) Previous meeting issues c) Line site visit report d) Accident statistics/report e) Unsafe act f) Legislative requirement / update g) SORA/GIGA/ Audit highlight h) Safety & Health Program. i) Environmental j) Report on compliance by Contractors / Employees k) training <p>The agenda discussed in the safety meetings are adequate to address the issue relating to OSH and also to update the new legislative requirement for compliance.</p>

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Clause	Indicators	Comply Yes/No	Findings
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	YES	<p>Accident and emergency procedures are available in adherence to the SPSB policy on 'Crisis Management & Emergency Response' plan - chapter 13 of PQMS, OSH manual and "Accident and Reporting and Investigation Procedure" in chapter 14 of the same manual.</p> <p>The estate and mill had established procedures for accidents and emergencies situations based on guidelines provided by certification & compliance unit department and amended to suit the various situations in the estate and mill. The procedure was available in both Bahasa and English. ERP Teams & ERP for all the identified incidences were available.</p> <p>The organizational charts for each established ERP team were displayed on notice boards at the offices, line sites, muster grounds & etc, for the information of the employees. Important telephone contact numbers of the Police Station, Fire Brigade, Immigration Department, Hospitals etc were also provided therein. In addition the procedures have been summarised in a chart flow form and displayed for information of all employees.</p>
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	YES	<p>All workers involved in potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. From interviews conducted with workers and staffs in the field and stores clerks it was established that they had been trained and were aware of safe handling procedures.</p> <p>Sanitation facilities for spraying and manuring operator was available at the store area with facilities such as shower room, washing machine, PPE rack, soap, etc. All the workers are understood and aware related to SOP after chemical application.</p>
	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	<p>All workers had been provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p>
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	<p>Records of all accidents are kept and filed in the Mill and Estate for a minimum period of 10 years. All occupational injuries were recorded using LTA (Lost Time Accident). Cases if any are reviewed during safety meetings. The incidences were summarized in the mandatory JKKP 6, JKKP 7 & JKKP 8 forms. The JKKP 8 form a It is also a mandatory requirement that the JKKP 8 form be submitted to DOSH by January of the subsequent</p>

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Clause	Indicators	Comply Yes/No	Findings
			year. Records are kept in the office.

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

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

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	It had been the practice that insecticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section 15 -Plant Protection and that no prophylactic use of such pesticides would be permitted. Barn owls was encouraged, as were introduced in Cluny Estate. Total number of barn owl boxes has been installed in the estate was 126 boxes with an occupancy ratio of 75.40%. As part of the IPM plans, the management of the estate had established beneficial plants (Cassia cobanensis, Antigonon leptopus, and Turnera subulata) nurseries for continuous planting in order to attract natural predators and thus reducing the use of insecticides. EFB applied at replants was applied in single layers and is not dumped in large amounts to prevent breeding of Rhinoceros Beetles. However, in replants prophylactic spraying using diluted cypermethrin for immature palms in zero burning of oil palm to oil palm replanting was carried out against Rhinoceros Beetles as per SOP.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	There was evidence that species referenced in the Global Invasive Species Database and CABI.org are to be used in managed areas, as per site visited and document review. Management has recorded in the document integrated pest management (IPM) invasive species record. Among of invasive species has been introduced as per CABI.org were Tyto Alba. It has been brought to the estate to control rats population. However, the species was not harm to the local species and spread quickly. As per current status in Malaysia barn owls has been accepted and has being used for control pest in plantation even in township areas.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	YES	Selaba SOU continued to use the Sime Darby Plantation Berhad's policy of no open burning. As advocated, the Estate practised Zero burning. Thus, there was no use of fire for pest control. In the 2020 replants visited during the audit in the estate, it was evident that all palms were felled, shredded, windrowed and left to decompose. Furthermore, there had been no serious outbreak of pest attacks on the Estate.
7.2 Pesticides are used in ways that do not endanger health of workers, families,	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	Cluny Estate continued to use agrochemicals based on its Agricultural Reference Manual (ARM) Section 15 and 16, SSOP and Pictorial Safety Standard Book (PSS) where written justifications had been provided for various fields operations. The Manual has included a chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estate

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Clause	Indicators	Comply Yes/No	Findings
communities or the environment.			continued to use pesticides as per the SOPs.
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	YES	Cluny Estate had records to show the types of pesticides used with active ingredients and their LD50, where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	Cluny estate was committed to minimise the usage of agrochemicals by implementing IPM. Blanket spraying was not practised by the Estate and soft grasses maintained in the field. It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section 15 -Plant Protection and that no prophylactic use of such pesticides would be permitted.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	There was no evidence of any prophylactic use of pesticides.
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	YES	Cluny Estate only used pesticides that are officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision Pesticides Act 1974 (Act 149) (Section 53A); and in accordance with USECHH Regulations (2000). There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used. The chemical store and chemical list indicated that the estate had none of the chemicals. The use of paraquat was banned in all SDPSB estates. Most pesticides used were class III & class IV. a) The review of the chemical register concluded that all pesticides used were of class III & class IV. The use of <i>paraquat</i> had been prohibited in all SDP estates. b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. c) Sighted from records and interviews with workers, staff and estate assistants, concluded that trainings were held with all precautions being taken and all legal requirements The chemicals used in the estate were recorded in chemical register which were updated in Jan 2022.
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	As mentioned above in 7.2.5 of this check-list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. The Estate had only used Class III and Class IV chemicals. Hence, the need for a judgment of the threat assessment does not apply on the Cluny estate.
	7.2.5b Why there is no other	YES	As above.

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Clause	Indicators	Comply Yes/No	Findings
	alternative which can be used.		
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES	As above.
	7.2.5d What is the process to limit the negative impacts of the application.	YES	As above.
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	As above.
	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	Records showed that pesticides were handled, used and applied by trained persons and as per the MSDS of the pesticide. The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the MSDS training. It was also noted that MSDS are available at all sites during the audit. The chemical store in the estate was found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Thereafter disposal arrangement will follow accordingly as per procedures.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	The chemical store was found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). <ul style="list-style-type: none"> Records of purchase, storage and use were maintained. All store buildings were equipped with exhaust fans with the door secured. Only authorized personnel are assigned to handle the chemicals. All the chemicals were segregated in storage accordingly.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	As at December 2020 there were SW409 and SW 404 stock as per, Fifth Schedule (Regulation 11), Environmental Quality Act 1974, Environmental Quality (Scheduled Waste) Regulations 2005, Inventory of Scheduled Waste. Records sighted showed that empty pesticides containers were disposed as Scheduled Waste SW409, to DOE approved contractor.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This	YES	Aerial spraying was not practiced by Cluny Estate. This was also confirmed by interviewed workers.

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Clause	Indicators	Comply Yes/No	Findings
	requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.		
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	Aerial spraying was not practiced by Cluny Estate. This was also confirmed by interviewed workers. As per the recommendation from the CHRA assessment medical surveillance was conducted on yearly basis for foremen operator, monthly health surveillance by estate hospital attendant or VMO.
	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	Cluny Estate complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation whereby no work with pesticides is given to pregnant or breast-feeding women. <i>Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan</i>). During site visits there was no breastfeeding women and under age of 18 workers involved in chemical applications. The Estate maintained a list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estate and in compliance.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	YES	Selaba SOU has identified all wastes and sources of pollution. The Waste Management Action Plan FY 2021 and 2022 were established to mitigate and control the identified wastes and source of pollution.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	On Selaba CU waste disposal of both Scheduled and Domestic waste were disposed according to established procedures that were understood by all (confirmed at interviews). The procedures for handling used chemicals classified under Environment Quality Regulation (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by certification & compliance unit. The document is SD/SDP/PSQM(ESH)/203-EN1 – Scheduled Wastes (Hazardous Waste) Management dated 26/02/15 and is implemented in all SBPB estates and mills for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows; a) Management of class 1 chemical containers b) Management of class 2 (and higher) chemical containers c) Management of fertilizer bags Interviewed staff and workers confirmed understanding of procedures. Management had conducted trainings and briefings on Domestic and schedule waste handling and disposal.
	7.3.3 The unit of certification does not	YES	During site visit at all units of certification, there was no evidence of open burning had been used

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Clause	Indicators	Comply Yes/No	Findings
	use open fire for waste disposal.		for waste disposal. Records showed that Domestic Waste was disposed to government approved landfills.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	Selaba SOU practiced the maintenance of long-term soil fertility by annual application of fertilizers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and some EFB and compost application, water management and by maintaining soft weeds within interlines. The SOP for manuring was in Section 8 of the Agricultural Reference Manual and Section 14 of the EQMS. Fertilizer application, which was of paramount importance for maintenance of soil fertility, was carried out based on the recommendation made by the agronomist from Sime Darby Research Sdn. Bhd. Annual fertilizer recommendations were made based on annual foliar sampling. Soil sampling was carried out on a 5-year cycle basis last carried out on 21/09/2018 in Cluny Estate by Sime Darby Research Sdn. Bhd. The recommendation by the Agronomist were also available during the inspection and the application of fertilizers had been carried out as recommended and scheduled.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	Periodic tissue and soil sampling were carried out in Cluny Estate to monitor changes in nutrient status. Annual foliar sampling for the nutrients N, P, K, Mg, Ca & B had been carried out on 03/07/2021. The results of these samplings will form the basis for the fertilizers input recommendation to maintain and improve soil fertility for 2022. The soil analysis provided the indication of soil health and monitor the changes in the organic carbon and total nitrogen. Soil sampling was carried out on a 5 year cycle basis, last being on 21/09/2018.
	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	Cluny Estate continued to have a nutrient recycling strategy in place which included stacking of pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field and EFB mulching. For EFB application on the estate, priority was given for application in young mature areas and replants.
	7.4.4 Records of fertiliser inputs are maintained.	YES	Cluny Estate continued to monitor their fertilizer inputs as recommended by their agronomist, Sime Darby Research Sdn. Bhd who visited estate during the annual visit. Fertiliser application program was monitored using records like manuring master plan, program sheets, bin cards, field cost book, manuring audits by Planning and Monitoring Department under Upstream Department from headquarters. Records of programs and applications of fertilisers were made available to auditors. Noted from the records that the actual amounts of fertilisers applied in 2020 and 2021 were completed in Estate.
7.5 Practices minimise and control erosion and	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	Maps identifying marginal and fragile soils, including steep terrain, are available o Cluny Estate. Auditors verified the Soil Map prepared by R & D -RSGA Precision Agriculture Uit (NHS) in Feb 2015. There are no marginal and fragile soils on Cluny Estate. The soils series were as follows:

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Clause	Indicators	Comply Yes/No	Findings	
degradation of soils.			Type	%
			Muchong	33.22
			Seramban/Muchong	26.70
			Seremban	18.72
			Trlemong / Local Alluvium	8.83
			Gajah Mati	4.40
			Rasau	3.93
			Alluvium / Colivium	3.05
			Serdang	0.86
			Unclassified	0.29
	7.5.2 No replanting on steep slopes (above 25 degress) 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	Cluny Estate had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by: <ul style="list-style-type: none">Slope & River Protection Policy updated on January 2015.Buffer Zone & 25degree slope and in item 8 Section 4Land Preparation for Terracing in ARM Manual. It was observed that there was no replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the SOU. It was also observed that practices to minimise and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the immature and in some mature areas. The cover crop Mucuna bracteata had been planted along some slopes by management. Large areas with Neprolepis biserrata in the inter rows were sighted during the visit.	
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	It was observed that there was no new planting of oil palm on steep terrain.	
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	YES	Cluny Estate had a management strategy for palm oil cultivation, taking into account the soil maps and surveys identifying marginal and fragile soils, including steep terrain for the palm oil long term suitability.	
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	Auditors verified the Soil Map prepared by R & D -RSGA Precision Agriculture Unit (NHS) dated Feb 2015. There are no marginal and fragile soils on Cluny Estate.	

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Clause	Indicators	Comply Yes/No	Findings
operations.	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	The management of Cluny Estate continued to use Soil surveys and topographic information guide in the planning of drainage and irrigation systems, roads and other infrastructure.
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.	NA	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to estate. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Cluny Estate. Furthermore, as per the soil maps and site visits there are no peat soils on estate.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 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).	NA	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to estate. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Cluny Estate. Furthermore, as per the soil maps and site visits there are no peat soils on estate.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	NA	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to estate. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Cluny Estate. Furthermore, as per the soil maps and site visits there are no peat soils on estate.
	7.7.4 (C) A documented water and ground cover management programme is in place.	NA	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to estate. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Cluny Estate. Furthermore, as per the soil maps and site visits there are no peat soils on estate.
	7.7.5 (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	NA	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to estate. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Cluny Estate. Furthermore, as per the soil maps and site visits there are no peat soils on estate.

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Clause	Indicators	Comply Yes/No	Findings
	<p>timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>		
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	NA	Based on site visits and the Soil Map prepared by R & D -RSGA Precision Agriculture Unit (NHS) dated Feb 2015, and site visits there are no peat soils on Cluny estate.
	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	NA	Based on site visits and the Soil Map prepared by R & D -RSGA Precision Agriculture Unit (NHS) dated Feb 2015, and site visits there are no peat soils on Cluny estate.

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Clause	Indicators	Comply Yes/No	Findings	
	Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.			
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: 7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. 7.8.1b Workers have adequate access to clean water.	YES	Cluny estate had in place and implemented water management plans. Plans for 2021 and 2022 were sighted. The water management plans were tailored towards how to reduce rainwater collection, to Improve user awareness and domestic use. The water management plans details are as follows;	
			Area / Incident	Action Steps
			Water Shortage/Dry Spell	to purchase water from Lembaga Air Perak to train staff/workers to conserve water
			Severe water pollution/contamination	water to be purchased from Lembaga Air Perak to perform treatment of polluted water with assistance from Lembaga Air Perak
			Rain water collection	Large containers placed at strategic locations Rain water used for washing vehicles
			Monitoring water usage	Monitoring water consumption
			Prevent leakages	Regular checking of pipes and water meters
			Recycle waste water form washings of spraying pumps, PPE and chemical mixing areas Recycle waste water for chemical mixing/spraying	
			Based on stakeholder consultation with local communities and field visit, there was evidence that the CU does not restrict access to clean water or contribute to pollution of water used by communities. As verified at SOU facilities for workers and through interview with workers, all workers have obtained adequate access to clean water via Syarikat Lembaga Air Perak.	
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	YES	SOU Selaba continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estate adopted the existing SDP policy to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management. The signboards were displayed accordingly at the site where applicable. The guideline was issued by the SQM Unit. During the field visit there was no spraying activities or signs left in such an area.	
	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	<u>EQ (Prescribed Premise) Crude Palm Oil Regulations 1977</u> <ul style="list-style-type: none">• License number and validity period – 40mt/hr• Discharge method – Water course.• Effluent analysis tests for final discharge were carried out on a monthly basis through internal accredited lab from Sime Darby Research Sdn Bhd, Carey Island. The results were within the limit.	
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Selaba POM continued to monitor and record water use per tonne of FFB.	

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Clause	Indicators	Comply Yes/No	Findings												
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	<p>Plan for improving efficiency of the use of fossil fuels and to optimize renewable energy has established such as:</p> <table border="1"> <thead> <tr> <th>No.</th><th>Energy</th><th>Action plan</th><th>PIC</th></tr> </thead> <tbody> <tr> <td>1</td><td>Diesel</td><td> -servicing vehicle in timely manner and on contractual basis to ensure efficient use of fuel and preventive maintenance to avoid leakages. -to educate workers by having program on fuel saving practices i.e turn off the engine when vehicle not in used. -no open burning at linesite -To ensure the vehicle engine is turn off during idle time -To record vehicle activity in order to eliminate wasteful activities </td><td>Assistant manager & foremen</td></tr> <tr> <td>2.</td><td>Electricity</td><td> -installing energy saving appliances, replacing energy saving bulb at workers quarters and using photo -censor to light up street light & compound spotlight. -educate workers on saving energy usage i.e turn off electric switch when not in use </td><td>Assistant Manager & QA</td></tr> </tbody> </table>	No.	Energy	Action plan	PIC	1	Diesel	-servicing vehicle in timely manner and on contractual basis to ensure efficient use of fuel and preventive maintenance to avoid leakages. -to educate workers by having program on fuel saving practices i.e turn off the engine when vehicle not in used. -no open burning at linesite -To ensure the vehicle engine is turn off during idle time -To record vehicle activity in order to eliminate wasteful activities	Assistant manager & foremen	2.	Electricity	-installing energy saving appliances, replacing energy saving bulb at workers quarters and using photo -censor to light up street light & compound spotlight. -educate workers on saving energy usage i.e turn off electric switch when not in use	Assistant Manager & QA
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7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	YES	<p>GHG emission has been identified and assessed to the estate and mill through list of waste products, EIA, pollution prevention plan, etc. for year 2021 and 2022. CU calculated the emission through RSPO Palm GHG calculator version 4 (data as table below). CU also submitted GHG footprint report to the RSPO and RSPO annual communication of progress (ACOP) (publicly available report).</p> <p><u>Summary of net GHG emissions (2020) from PalmGHG calculator</u></p> <p>Summary of Emissions</p> <table border="1"> <thead> <tr> <th>Description</th><th>tCO₂e/tProduct</th><th>Extraction Rate</th><th>%</th></tr> </thead> <tbody> <tr> <td>CPO</td><td>1.52</td><td>OER</td><td>19.69</td></tr> <tr> <td>PK</td><td>1.52</td><td>KER</td><td>4.76</td></tr> </tbody> </table>	Description	tCO ₂ e/tProduct	Extraction Rate	%	CPO	1.52	OER	19.69	PK	1.52	KER	4.76
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CPO	1.52	OER	19.69												
PK	1.52	KER	4.76												

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Clause	Indicators	Comply Yes/No	Findings							
			Land Use			Ha				
			OP Planted on mineral soil			24553.50				
			OP Planted on Peat			258.40				
			Conservation (forested)			0				
			Conservation (non-forested)			0				
			Total			24811.90				
			Summary of Plantation/field emissions and sink							
			Description		Own			Group		
					tCO2e	tCO2e/ha	tCO2e/tFFB	tCO2e	tCO2e/ha	tCO2e/tFFB
			Land conversion	6802.70	5.31	0.75	44481.21	1.89	0.70	
			CO2 emission from fertiliser	512.69	0.40	0.06	3709.31	0.16	0.06	
			N2O Emissions from Peat	0	0	0	435.16	0.02	0.01	
			N2O emission frm fertilizer	274.19	0.21	0.03	2203.06	0.09	0.03	
			Fuel consumption	57.40	0.04	0.01	487.00	0.02	0.01	
			Peat Oxidation	0	0	0	3173.96	0.13	0.05	
			Crop sequestration	-6448.05	-5.03	-0.71	-42072.88	-1.79	-0.66	
			Sequestration in conservation area	0	0	0	0	0	0	
			Total	1198.93	0.94	0.13	12416.81	0.53	0.20	

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Clause	Indicators	Comply Yes/No	Findings																																		
			<div>Summary of Mill emission and credits</div> <table><tr><th>Description</th><th>tCO2</th><th>tCO2e/tFFB</th></tr><tr><td>POME</td><td>31471.84</td><td>0.20</td></tr><tr><td>Fuel Consumption</td><td>16.75</td><td>0.00</td></tr><tr><td>Grid Electricity Utilisation</td><td>390.91</td><td>0.00</td></tr><tr><td>Export of Excess Electricity to Housing & Grid</td><td>0.00</td><td>0.00</td></tr><tr><td>Sale of PKS</td><td>0.00</td><td>0.00</td></tr><tr><td>Sale of EFB</td><td>0.00</td><td>0.00</td></tr><tr><td>Total</td><td>31879.51</td><td>0.20</td></tr></table> <div>Palm Oil Mill Effluent (POME) Treatment</div> <table><tr><td>Diverted to compost</td><td>0%</td></tr><tr><td>Diverted to anaerobic digestion</td><td>100%</td></tr></table> <div>POME Diverted to Anaerobic Digestion</div> <table><tr><td>Diverted to anaerobic pond</td><td>100%</td></tr><tr><td>Diverted to methane capture (flaring)</td><td>0%</td></tr><tr><td>Diverted to methane capture (electricity generation)</td><td>0%</td></tr></table>	Description	tCO2	tCO2e/tFFB	POME	31471.84	0.20	Fuel Consumption	16.75	0.00	Grid Electricity Utilisation	390.91	0.00	Export of Excess Electricity to Housing & Grid	0.00	0.00	Sale of PKS	0.00	0.00	Sale of EFB	0.00	0.00	Total	31879.51	0.20	Diverted to compost	0%	Diverted to anaerobic digestion	100%	Diverted to anaerobic pond	100%	Diverted to methane capture (flaring)	0%	Diverted to methane capture (electricity generation)	0%
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	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of	YES	Auditors has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estate areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at SOU Selaba Hence, RSPO GHG Assessment Procedure for New																																		

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Clause	Indicators	Comply Yes/No	Findings															
	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).		Development was not applicable.															
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	<div>Cluny Estate had established the <i>Pollution Prevention Plan 2021/2022</i> among others addressing the following environmental issues;</div> <table><tr><th></th><th>Issues</th><th>Mitigation measures</th></tr><tr><td>1</td><td>Leakage of pesticide during chemical mixing</td><td>to recollect water used at chemical mixing area to be recycled during mixing to construct containment sum at chemical mixing area to contain leakages</td></tr><tr><td>2</td><td>Contaminated ground / soil at workshop area</td><td>to replace tray whenever tractors / machines under repairing progress to avoid oil spillage on the ground periodic checking on oil sump to ensure it is well maintained and to avoid any leakages</td></tr><tr><td>3</td><td>Prohibited spraying at line site</td><td>education to workers not to spray at the line site and explain reason for such a directive. periodic checking at the line site</td></tr><tr><td>4</td><td>Prohibited spraying & fertilizer or chemical near the river (buffer zone)</td><td>provide training and create awareness to workers identifying and marking the buffer zones</td></tr></table>		Issues	Mitigation measures	1	Leakage of pesticide during chemical mixing	to recollect water used at chemical mixing area to be recycled during mixing to construct containment sum at chemical mixing area to contain leakages	2	Contaminated ground / soil at workshop area	to replace tray whenever tractors / machines under repairing progress to avoid oil spillage on the ground periodic checking on oil sump to ensure it is well maintained and to avoid any leakages	3	Prohibited spraying at line site	education to workers not to spray at the line site and explain reason for such a directive. periodic checking at the line site	4	Prohibited spraying & fertilizer or chemical near the river (buffer zone)	provide training and create awareness to workers identifying and marking the buffer zones
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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	Cluny Estate complied to the strict Zero Burning Replanting Technique practiced in relation to all new plantings, replanting or other development which published in their website http://www.simedarbyplantation.com/sustainability/beliefs-progress/practices-key-initiatives/good-agricultural-practices/zero-burning-replanting-technique .															
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	Selaba SOU had established fire prevention and control measures for the areas under its direct management. The estate had established Emergency Response Team for fire fighting and had the necessary equipment to fight fires. Each Estate had Tractor drawn water tanks with pumps and hoses.															
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	Selaba SOU had engaged adjacent stakeholders on fire prevention and control measures via stake holder meetings.															

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Clause	Indicators	Comply Yes/No	Findings
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.	NA	There was No new land clearing since Nov 2005 in Cluny Estate, thus this Indicator was not Applicable.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows: 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. 7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	YES	SOU Selaba has reviewed their HCV with new assessment conducted on December 2015. The new HCV assessment titled 'HCV Re-Assessment For SOU 5 – Seri Intan / Selaba which included both the planted area and relevant wider landscape-level considerations with villages and forest reserved. The total area of HCV area for SOU Selaba is 6.49ha HCV area.
	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	YES	Progress of implementation of the action plans 'HCV Management Plan FY: 2022 Objectives & Target – for Cluny Estate were reviewed and verified on the ground. The action Plan contains monitoring requirements and updated every year, for Cluny Estate HCV Plan including monitoring programmed was updated in January 2022, and already consult with stakeholder on 5/10/2021 by letter to all stakeholders affected.

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Clause	Indicators	Comply Yes/No	Findings
	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).		
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	YES	HCV Re Assessment has been done on December 2015, but no rights of local communities have been identified in HCV areas. Thus, this indicator was not applicable.
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	YES	Although there was no RTE species found in the CU, SOU Selaba 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 estate will make a report to the Wildlife Department immediately.

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Clause	Indicators	Comply Yes/No	Findings
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	YES	Progress of implementation of the action plans 'HCV Management Plan FY: 2022 Objectives & Target – for Cluny Estate were reviewed and verified on the ground. Cluny Estate has conducted an on-going monitoring of their HCV4 the latest conduct by quarterly basis. Noted the CU had continued to implement planned actions such as awareness to the staffs and public on enhancing biodiversity, posting of relevant information in the Sime Darby webpage and erection of signage at strategically locations. The outcomes of monitoring will be feedback into the next year action plan.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	NA	Not applicable since there is no new land clearing
AUDITORS' GUIDE IN REPORTING ORANG ASLI MATTERS (if applicable) – FOR NON-COMPLIANCES, TO RAISE AT SPECIFIC INDICATORS IN THE MYNI CHECKLIST.			
No specific clause – Information related to Orang Asli / Indigenous People:	<p><i>To include details on Orang Asli</i></p> <p><i>1. To report the name of their kampung and placement (penempatan). No. of the residents of Orang Asli.</i></p> <p><i>2. Where they are located (radius within 5km from the CU). Check the estate map and estate boundary on neighboring Orang Asli villages.</i></p> <p><i>3. Verify the stakeholders list on neighboring Orang Asli community with the CU.</i></p> <p><i>4. Read the SIA or SEIA and HCV or HCV-HCSA reports if these assessments had identified potential Orang Asli village(s) that may be affected by the CU operation. If yes, what the issues and recommended mitigation action.</i></p> <p><i>5. Verify if any of estate activities may affected the Orang Asli through consultation with auditor. Get the information from head of village (local & Orang Asli) how they started the village (origin, nomad, or separation from other</i></p>		<ol style="list-style-type: none"> 1. Kampung Sungai Bill (More Than 50 Family and 100 over resident) and Kampung Kuala Bill (More than 40 Family and 100 over residence) 2. There are 2 Orang Asli villages at Cluny Estate which is Kg Kuala Sungai Bill and Kg Sungai Bill. Kg Sungai Bill is nearest to Sungai Bill division and Kampung Kuala Bill is within in the 10 km radius from another division. 3. There are updated stakeholder list inclusive of this 2-village orang asli . 4. The SEIA dated 24 Feb – 4 Mar 2014 and addendum has been in placed dated 4 April 2019 already identified both of this villagers and during this assessment assessor has interviewed with Dollah which is Tok Batin from Kampung Sungai Bill, There is no significant issues since Cluny Estate always helping them in case of anything. They also depend on JAKOA if they have an issue since JAKOA always helping them. For Kampung Kuala Bill The Assessor are trying to reach the Kamarudin (Tok Batin Kuala Bill) but can't reach to tok batin since he have a meeting with JAKOA. 5. Assessor also verify through latest stakeholder meeting dated 5/10/2021 no issues has been highlighted by both Tok Batin. Consultation with Dollah which is Tok Batin from Kampung Sungai Bill, There is no significant issues since Cluny Estate always helping them in case of anything. Tok Batin also said that he will reach to the manager if they need help as both of them had the AM and Manager numbers. They also depend on JAKOA if they have an issue since JAKOA always helping them. For Kampung Kuala Bill. The Assessor are trying to reach the Kamarudin (Tok Batin Kuala Bill) but can't reach to tok batin since he have a meeting with JAKOA

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Clause	Indicators	Comply Yes/No	Findings
	<p><i>orang asli village), their daily needs, roaming area, sacred area, grave, food source, supply of clean water, where they work, and education for their children.</i></p> <p><i>6.Evidence of FPIC had been implemented by the CU and consent given by the Orang Asli communities.</i></p> <p><i>7.What are the CSR from the CU to Orang Asli. Significant CSR for long term development for Orang Asli? Any specific request/needs from Orang Asli from the CU?</i></p> <p><i>8.Consult DFO of Forestry Department and PERHILITAN for any issues related to the Orang Asli.</i></p> <p><i>9.Provide the specific names of Orang Asli representatives sampled during every audit.</i></p>		<p>6. No FPIC needed as no issues related to the land and their daily needs, roaming area, sacred area, grave, food source since they freely to go all around the estate for fishing and hunting. No issues with their education for children since JAKOA are helping them through transportation to school and some of their Parents are send their children by themselves to the school. Half of the Sungai Bill and Kuala Bill villagers are working with Cluny Estate as FFB Collector, Mandore and Sprayer.</p> <p>7. CSR from Cluny are they provide the Job to Orang Asli. And no specific request from orang Asli.</p> <p>8. Consultation with DFO of Forestry Dept Khairul Naim Yaakub no issues related to Orang Asli.</p> <p>9. Dollah From Kampung Sungai Bill and Kamarudin from Kampung Kuala Bill (through Phone)</p>
	<p><u>Common social issues on Orang Asli</u></p> <p>1.Accessibility for Orang Asli from their village to the estate and/or roaming area.</p> <p>2.Protection of cemetery of Orang Asli which located within the estate.</p> <p>3.Opportunity for employment – male & female.</p> <p>4.Do they understand the employment procedures and agreement?</p> <p>5.Are their employment contract complying with the RSPO P&C MYNI 2019?</p> <p>6.Did they receive appropriate trainings & briefings and other necessities (PPE) to work as other local/foreign workers?</p> <p>7.Replanting activity that may affected the Orang Asli community.</p> <p>8.Accessibility for clean water from nearby river or water scarcity.</p> <p>9.Hunting of wild boar/monkey/fish/birds within estate area or at the estate boundary.</p> <p>10.Education for the Orang Asli children.</p>		<p>1. No issues related to accessibility and their daily needs, roaming area, sacred area, grave, food source since they freely to go all around the estate for fishing and hunting. No issues with their education for children since JAKOA are helping them through transportation to school and some of their Parents are send their children by themselves to the school. Half of the Sungai Bill and Kuala Bill villagers are working with Cluny Estate as FFB Collector, Mandore and Sprayer.</p> <p>2. No issues of Protection of cemetery of Orang Asli since no cemetery in the estate.</p> <p>3. Half of the Sungai Bill and Kuala Bill villagers are working with Cluny Estate as FFB Collector, Mandore and Sprayer.</p> <p>4. All orang Asli here are educated and they understand the employment procedure and agreement since all their agreement in Bahasa Malaysia.</p> <p>5. All their agreement is complied with the RSPO P&C MYNI</p> <p>6. They receive the same treatment with all the workers in Cluny Estate, inclusive of Training and briefings and also PPE.</p> <p>7. There are no issues related to Replanting with Orang Asli community</p> <p>8. They receive water at their villages from Lembaga Air Perak. And nearby rive is for their fishing needs.</p> <p>9. For Hunting in the estate there is no issues since Cluny Estate are allowed them to freely roaming surrounding the Estate.</p> <p>10. No issues with their education for children since JAKOA are helping them through transportation to school and some of their Parents are send their children by themselves to</p>

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Clause	Indicators	Comply Yes/No	Findings
			the school.
	<p><u>What CU needs to do to address the issues</u></p> <ol style="list-style-type: none"> 1.FPIC with the affected Orang Asli communities on the estate operation. 2.Annual external stakeholder consultation with Orang Asli representative. 3.Stakeholder consultation with the community had been conducted during initial SIA assessment. 4.Review social action plan with participatory of affected Orang Asli. 5.Brief and circulate grievances/ disputes mechanism/procedure. 6.To offer job opportunity to Orang Asli – male & female. 7.Protection of Orang Asli sacred area or grave. 8.CSR to Orang Asli - grass cutting, LF collection, nursery, road/bridge maintenance, food donation, transport services for Orang Asli children to go to school, etc. 		<ol style="list-style-type: none"> 1. No FPIC needed as no issues related to the land and their daily needs, roaming area, sacred area, grave, food source since they freely to go all around the estate for fishing and hunting. No issues with their education for children since JAKOA are helping them through transportation to school and some of their Parents are send their children by themselves to the school. Half of the Sungai Bill and Kuala Bill villagers are working with Cluny Estate as FFB Collector, Mandore and Sprayer 2. Assessor also verify through latest stakeholder meeting dated 5/10/2021 no issues has been highlighted by both Tok batin. Consultation with Dollah which is Tok Batin from Kampung Sungai Bill, There is no significant issues since Cluny Estate always helping them in case of anything. Tok Batin also said that he will reach to the manager if they need help as both of them had the AM and Manager numbers. They also depend on JAKOA if they have an issue since JAKOA always helping them. Both Tok Batin also highlighted that besides the annual meeting there is also frequently unofficial meeting by the manager as manager always give a 5kg rice per family. 3. The SEIA dated 24 Feb – 4 Mar 2014 and addendum has been in placed dated 4 April 2019 already identified both of this villagers and during this assessment assessor has interviewed with Dollah which is Tok Batin from Kampung Sungai Bill, There is no significant issues since Cluny Estate always helping them in case of anything. They also depend on JAKOA if they have an issue since JAKOA always helping them. For Kampung Kuala Bill The Assessor are trying to reach the Kamarudin (Tok Batin Kuala Bill) but can't reach to tok batin since he have a meeting with JAKOA. 4. The SEIA Plan dated 23 Dec 2021 has updated with orang Asli as verify through stakeholder meeting dated 5/10/2021 and no issues has been highlighted. 5. As of the explanation above, grievances, dispute mechanism procedure are already in place and clearly explain to them as both of the Tok Batin have the AM and Manager Numbers, they also seek clarification and complaints if anything to the Cluny Estate office, but as of to date no issues has been highlighted during interviewed with them. 6. Half of the Sungai Bill and Kuala Bill villagers are working with Cluny Estate as FFB Collector, Mandore and Sprayer 7. No issues of Protection of Orang Asli sacred area or grave of Orang Asli since no Orang Asli sacred area or grave in the estate. 8. As mentioned of the above Half of the Sungai Bill and Kuala Bill villagers are working with Cluny Estate as FFB Collector, Mandore and Sprayer, besides that, Estate also always give them a 5kg rice, and repaired the road and bridge if broke.

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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>	(a)	<p>As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.</p>	YES	<p>SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.</p> <p>Indonesia</p> <p>PT Bahari Gembira Ria Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P9000001OioYJEAZ</p> <p>PT Sandika Natapalma & PT Budidaya Agro Lestari Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing. As at June 2017, the smallholders with the total of 29,914 Ha (58% from the total Ha, 51,715 Ha) of associated smallholders in Indonesia has been certified. Certification process for the remaining associated smallholder's areas was on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and out growers by end 2020.</p> <p>PT Bersama Sejahtera Sakti The new project at KKPA Maju Bersama by the plasma community is currently in nursery stage and not yet due for harvesting, the year of planting was in 2014.</p> <p>PT Ladang Rumpun Subu Rubadi SAP 1 Estate PLASMA will be undergone 2nd stage audit on 2019.</p> <p>PT Guthrie Pecconina PT Bina Sains Cemerlang, PT Sime Indo Agro Land legalization still in progress.</p> <p>PT Bina Sains Cemerlang, PT Sime Indo Agro Issue in getting Surat Perijinan, still in progress.</p> <p>Papua New Guinea (NBPOL) Markham Farming Company Limited (MFCL) / Markham Agro Pte. Ltd. Estimate to be certified on year 2020. The majority of Markham Farms has already been planted by the former</p>

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				owner without following RSPO NPP. Therefore, the Remediation and Compensation Procedure will be required to be full filled in order to achieve certification. The Disclosure has been has been initiated on 18.10.18. Currently HCV/HCS, SEIA and LUCA are being undertaken in order to submit and mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration. https://rspo.org/certification/remediation-and-compensation/racp-tracker no 82
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	YES	<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. http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965 .</p> <p>As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI). http://www.simedarbyplantation.com/media/press-releases/sime-darbyplantation-completes-divestment-of-its-liberia-operations</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 by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	YES	As above.
	(d)	Where there are isolated lapses in	YES	As above.

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		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.		
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 7.12 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. 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

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(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, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:</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; • Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. • Desktop study e.g. web check on relevant complaints • If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non- 	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>

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		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	As above
	(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	As above

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<p>5.6.6</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>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.</p> <p>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>		No additional indicators	YES	<p>As it has been mentioned in 4.4.1 of this checklist, The Land Title for All Estate has been verified, for all estates. The Land Title was under the name of Sime Darby Plantation Bhd. Each estate had legal use of the land through Lands and Surveys Department following the payment of premium and Land fee. Based on this, it has been confirmed that there was no such case concerning the rights of local communities or indigenous people in the SOU.</p>
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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
		NONE	Root cause: Corrective Action:	

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
3.8.7 MZK 01 2020	Major	<p>Finding : There is projected overproduction of certified tonnage. Objective evidence : Sighted that overproduction Projected FFB, CPO and PK for period Dec 2019 - Nov 2020 which is projected 31,393.81 mt (FFB), 6,379.22 (CPO), 1,594.81 (PK) and actual production of 68,847.19 (FFB), 13,571.49 (CPO), 3,299.16 (PK) which is more than projected, and Selaba POM yet to inform the CB and apply extension to the RSPO.</p>	<p>Correction: To inform and request the approval of the FFB tonnage production extension to Certified Body. Corrective Action: The monitoring of the certified FFB production in line with the projected/budgeted approval on monthly basis. Mill to submit the summary of the FFB process to Regional Sustainability Management for review. Requisition of extension if there are production already achieved 70% of the projection and yet to reach the final quarter of the Financial Year.</p>	<p>Sighted during this Assessment SOU Selaba already apply for Volume extension on dates 23/7/2021 from their certified FFB, CPO and PK which is from 2,075.85Mt FFB, 434.06 Mt CSPO, and 103.79 CSPK and the extension of 21, 472.17Mt CSPO, 5,177.3mt CSPK and 107,197.21mt FFB has been approved on 29/7/21 due to diversion from their certified SOU e.g Seri Intan Estate, Sabrang Estate, Sg Wangi Estate, Bikam Estate, Bagan Dato Estate, Flemington Estate, Sg Samak Estate, Sogomana Estate, Sabak Bernam Estate.</p> <p>Status: Closed – Implementation verified.</p>
6.2.3 RZ 01 2020	Major	<p>Finding: Selaba Palm Oil Mill was not able to demonstrate compliance with the conditions for overtime work imposed by the Labour Department under Section 60A(4)(a) Employment Act 1955. Objective evidence: The following sampled workers at Selaba Palm Oil Mill were found to have worked as follows: 1. Ashik and Worker No. 129826 worked overtime in excess of 4 hours on their rest days. This is contrary to paragraph 2(ii) of the JTK permit dated 2 March 2017 (Ref BHG PU/9/134 JLD 9(11) which states that if the worker is required to work on his rest day, overtime must not exceed</p>	<p>Correction: To cease the unauthorized extra Over Time exceeding JTK approved limit immediately (1/1/2021). Corrective Action Plan: Monitoring the manhours on daily basis by the assistant mill. Additional hours (more than 7 hours/weekday or 4 hours in rest day) is not allowed. The workplan for overtime will be offer to workers a day before commencement of work on the next day.</p>	<p>Inter Office Mail (Ref No: CEOUM/076/12/2021) dated 2 Dec 2021 on "HOURS OF WORK AND OVERTIME". Based on interview with sampled employees and documentation review such as checkroll, punch card, payslip and agreement, no OT exceeded 4 hours on rest days. Management has established the consent for OT for each employee.</p>

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		<p>4 hours.</p> <p>No written consent from all sampled workers were obtained. This is contrary to paragraph 2 (iii) of the JTK permit dated 2 March 2017 (Ref BHG PU/9/134 JLD 9(11) which states that a written consent from the workers must be obtained.</p>	To hire the new workers as per mill's manpower budget.	Status: Closed - implementation verified.
3.4.3 RZ 02 2020	Major	<p>Finding: Selaba Palm Oil Mill and Cluny Estate social action management and monitoring plan were not implemented, reviewed and updated with the participation of affected stakeholders.</p> <p>Objective Evidence: Selaba Palm Oil Mill and Cluny Estate could not demonstrate that the social action plans were implemented, reviewed and updated with participation of affected stakeholders. As a result, the following social-related issues was not being identified and assessed:</p> <p>Selaba POM: Assessment on the impact of reduced overtime hours on workers' income; Assessment of impacts on workers' amenities (namely, car garage at the housing area) following the budget curtailment. Assessment of workers' concern and sentiment towards the challenges posed at the workers' housing by a resident's son.</p> <p>Cluny Estate: Assessment of workers' right to adequate food and food security following the decision to clear vegetables planted behind Block B before providing a readily available alternative site for planting vegetables.</p>	<p>Selaba POM :</p> <p>Correction:</p> <p>a. To conduct a feedback study on the overtime issue affecting on worker's income. The management will be carried out the meeting with availability of worker representative (as observer) to discuss on the feedback. Management will be presenting the outcome to all workers during muster/roll call.</p> <p>b. To conduct the assessment of the worker's need on the house garage (only for those who has a car or based on the house design). To allocate a budget and built the garage.</p> <p>c. To conduct the assessment on worker's sentiment on the issue of aggressiveness of Disabled Person who is a son of a mill's worker.</p> <p>Corrective Action: Establishment of Employee Welfare Committee to cater all social issues in worker housing complex. The social issues raised by the employees will be discussing in EWC meeting on quarterly basis. The action to be taken will be updated in Social Management Plan.</p> <p>Cluny Estate: d) 1) Management already start in February 2021 "Green book" area and start to allocate who workers needed to plant</p>	<p>it was verified that social management plan was updating on workers' rights to adequate food and has provide new area i.e Green Book area to plant vegetables after management has cleared the old vegetables behind block B.</p> <p>Status: Closed – Implementation verified</p>

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			the Vegetable. 2) Management already carry out assessment for every representative block leader to get approval for plant vegetable at “centralized” Green Book Area	
7.2.10 RAR 01 2020	Major	Finding : Requirement for Specific annual medical surveillance for pesticide operators was not complied with Objective evidence : Specific annual medical surveillance for pesticide operators not yet carried out. Last conducted on 29/10/2019.	Estate to conduct the medical surveillance to pesticide operator as per given NCR and will act accordingly from the recommendation given by the OHD. Estate management to confirm with the Head Office regarding this issue since the estate already followed the CHRA recommendation as per regulatory compliance. Management will monitor the compliance of medical surveillance in the OSH Committee platform & SQM quarter review (SOU basis)	Medical Surveillance carried out on 19/03/2021 for 18 employees (sprayers 16, Workshop 2). In 2022 Medical Surveillance was carried out for 16 employees (13 Sprayers, 2 Workshop and 1 Store keeper). The surveillance was carried out by Dr. Tan Kim Soon (HQ/08/DOC/00/660) of Klink K. S. Tan.
3.3.3 RZ 03 2020	Minor	Finding: 1. No record of monitoring and action taken against sundry shop at Cluny Estate for not complying with the warning letters issued by Manager dated 10 October 2020 and 10 Nov 2020. 2. No record of monitoring and action taken to ensure medical practitioner (VMO) visits Cluny Estate and Trolak Division clinics as per the SOP for Primary Health Care Services in Plantation Doc No. SD/SDP/PSQM (ESH)/202-OH14 dated 1 March 2017. Objective Evidence: 1. The sundry shop operator at Cluny Estate was found not to have complied with warning letters issued by Estate Manager dated 11 October 2020 and 10 November 2020 for having breached the following laws: • Selling LPG without license under Section 16 Control of Supplies Act 1961. • Operating business without license as required under Section 5(1) Registration of Businesses Act 1956. • Selling hard liquor within Cluny Estate premises. 3. VMO visits to the Cluny Estate and Trolak Division clinics were carried out only once a month not once a fortnight	Cluny Estate: 1) a) Sundry shop owners are unable to follow the regulation. Management did not renew the contract expired on 31/12/2020 and has given notice to close the Sundry shop starting 1 January 2021. b) Management has offered the opening new Sundry shop tender to anyone interested in renting a Sundry shop in accordance with the standard regulations. c) Periodic monitoring to check goods selling & price will be carried out monthly basis. 2) a) The management has given a reminder letter to VMO to follow the visit twice a month as per SOP for Primary Health Care Services in plantation documents. b) If VMO still fails to provide	1.Auditor has verified “Borang D (Kaedah 13), Perakuan Pendaftaran Akta Pendaftaran Perniagaan 1956 (Akta 97) for Casper Resources, No Pendaftaran : 202003032476, which registered on 9 Jun 2020. Based on inventory of the shop, there was no hard liquor and LPG selling at the premise. .2.An annual price checklist was carried out annually on Nov 2021. Based on medical assistant, they will carry out price checking 2 times per year. 3. Latest visit by VMO (Dr Wong Che Hoa) was on 4 Jan 2022, 25 Jan 2022, 27 Dec 2021 and 12 Dec 2021.

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		<p>as per SOP for Primary Health Care Services in Plantation Doc No. SD/SDP/PSQM (ESH)/202-OH14 dated 1 March 2017 as follows:</p> <ul style="list-style-type: none">• 14 Nov 2019, 5 Dec 2019, 17 Feb 2020, 19 June 2020, 1 July 2020, 13 August 2020, 5 Sept 2020, 14 Oct 2020, 16 Dec 2020.	<p>cooperation to visit every 2 times a month, the management will find a replacement to new VMO.</p>	Status: Closed
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ATTACHMENT 6 – Timebound Plan

SDP - RSPO Certification for Time Bound Plan - Malaysia Operations

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

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

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8	East	East Oil Mill	-	Carey Island, Selangor	Certified	19-May-10	
		East Estate	-		Certified		
		Sepang Estate					
		Dusun Durian Estate	-		Certified		
9	West	West Oil Mill	-	Carey Island, Selangor	Certified	19-May-10	
		West Estate	-		Certified		
10	Bukit Puteri	Bukit Puteri Oil Mill	-	Raub, Pahang	Certified	7-Jul-11	
		Bukit Puteri Estate	-		Certified		
11	Kerdau	Kerdau Oil Mill	-	Temerloh, Pahang	Certified	7-Jul-11	
		Kerdau Estate	-		Certified		
		Jentar Estate	-		Certified		
		Mentakab Estate	-		Certified		

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
		Chenor Estate	-		Certified		
		Sg Mai Estate	-		Certified		
12	Jabor	Jabor Oil Mill	-	Kuantan, Pahang	Certified	7-Jul-11	
		Jabor Estate	-		Certified		
13	Labu	Labu Oil Mill	-	Nilai, Negeri Sembilan	Certified	30-Dec-11	New Labu Estate has become a division of Labu Estate.
		Labu Estate	-		Certified		
14	Tanah Merah	Tanah Merah Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	19-May-10	
		Tanah Merah Estate	-		Certified		

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		Bukit Pelandok Estate	-		Certified		
15	Sua Betong	Sua Betong Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	18-Feb-14	Siliao Estate has now been merged into Salak Estate and Bradwall Estate. Siliao Estate has now been merged into Salak Estate and Bradwall Estate.
		Sua Betong Estate	-		Certified		
		Sengkang Estate	-		Certified		
		Bradwall Estate	-		Certified		
		PD Lukut Estate	-		Certified		
		Tampin Linggi Estate	-		Certified		
		Sg. Bahru Estate	-		Certified		
		Salak Estate	-		Certified		
16	Kok Foh	Kok Foh Oil Mill	-	Bahau, Negeri Sembilan	Certified	7-Jul-11	Sg Gemas Estate has now been merged into Sg Senarut Estate
		Muar River Estate	-		Certified		
		Sg. Senarut Estate	-		Certified		
		Sg. Gemas Estate	-		Certified		
		Kok Foh Estate	-		Certified		
		Bukit Pilah Estate	-		Certified		
		St. Helier Estate	-		Certified		
		Sungai Sabaling Estate	-		Certified		
		Pertang Estate	-		Certified		
17	Kempas	Kempas Oil Mill	-	Jasin, Melaka	Certified	19-May-10	Serkam Estate, previously from SOU18(Diamond Jubilee) is now part of SOU 17(Kempas)
		Kempas Estate	-		Certified		
		Tangkah Estate	-		Certified		
		Kemuning Estate	-		Certified		

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

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

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

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

Legends

NA - NOT APPLICABLE

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

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

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

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

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		Sungai Jernih Estate and GPI KKPA Estate	2020	Oct-19		-		Sungai Jernih Estate and the KKPA Estates 1-5) has undergone audit. Land legalisation process is still in process.
11	PT Laguna Mandiri	Rantau Mill	-		Kotabaru District – South Kalimantan	Certified	30-Dec-11	
		Rantau Estate	-			Certified		
		Matalok Estate	-			Certified		
		Betung Mill	-			Certified	1-Apr-14	
		Betung Estate	-			Certified		
		Sekayu Estate	-			Certified		
12	PT Indotruba Tengah	Sekunyir Mill	-		Seruyan and West Kotawaringin District – Central Kalimantan	Certified	23-Nov-10	
		Sekunyir	-			Certified		
		Seruyan Estate	-			Certified		
13	PT Swadaya Andika	Selabak Mill	-		Kotabaru District – South Kalimantan	Certified	16-Mar-12	Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification.
		Selabak Estate	-			Certified		
		Randi Estate	-			Certified		
		Sangkoh Estate	-			Certified		
		Lanting Estate				Certified		
14	PT Bina Sains Cemerlang	Sungai Pinang Mill	-		Musi Rawas District – South Sumatera	Certified	11-Sep-12	Remarks: Land legalisation process for 308.35 ha is still in process.
		Sungai Pinang Estate	-			Certified		
		Bukit Pinang Estate	-			Certified		
15	PT Teguh Sempurna	Pemantang Mill	-		Seruyan and East Kotawaringin District – Central Kalimantan	Certified	5-Jul-11	
		Pemantang Estate	-			Certified		
		Kawan Batu Estate	-			Certified		
		Hatan Tiring Estate	-			Certified		
		Batang Garing Estate	-			Certified		

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

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		Blang Simpo-02 Estate	-			Certified		
21	PT Sandika Natapalma	Lembiru Mill	-		Ketapang District – West Kalimantan	Certified	3-Jul-14	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru Mill.
		Lembiru Estate	-			Certified		
		Awatan Estate	-			Certified		
		Karya Palma Estate	2020	Jul-19		-		
		KKPA SNP Estate	2020	Jul-19		-		
22	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Estate	-		Ketapang District – West Kalimantan	Certified	3-Jul-19	Perijinan' process is ongoing Perijinan' process is ongoing Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing HGU obtained as per May 2018 Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing
		Sungai Putih (PT BAL) Estate	2020	May-19		-		
		Beturus (PT BAL) Estate	2020	May-19		-		
		KKPA BAL Estate	2020	May-19		-		
23	PT Mitral Austral Sejahtera	MAS Mill	NA	NA	Sanggau District – West Kalimantan	NA	NA	The properties was sold and currently SDP have no control in the management. Please find latest information on 'Updates on PT MAS' worksheet and updates to RSPO Secretariat.
		MAS 1 Estate	NA	NA		NA		
		MAS 2 Estate	NA	NA		NA		
		MAS 4 Estate	NA	NA		NA		
		Plasma MAS Estate	NA	NA		NA		

Legends

Properties was sold.

Mill closed down/Mothballed

NA - NOT APPLICABLE

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

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

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

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

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

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

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