



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

File Ref. : ES10171015

RSPO PUBLIC SUMMARY REPORT

CLIENT : SIME DARBY PLANTATION BERHAD – SOU DERAWAN

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	
SOU 33 Derawan Certification Unit	Derawan Palm Oil Mill	3° 23'24.732"N	113° 20'43.500"E	97008 Bintulu, Sarawak
	Derawan Estate	3° 23'59.230"N	113° 20'33.620"E	97008 Bintulu, Sarawak
	Sahua Estate	3° 29'48.264"N	113° 23'13.200"E	97008 Bintulu, Sarawak
	Takau Estate	3° 23'59.230"N	113° 20'33.620"E	97008 Bintulu, Sarawak
	Damai Estate	3° 28'15.564"N	113° 23'52.800"E	97008 Bintulu, Sarawak

MAP : See Attachment 1

AUDIT DATE : 13 to 18 December 2021

DURATION : 28 auditor days

TYPE OF AUDIT :  Annual Surveillance Audit 4 – 2020

Recertification Audit – 2021


STANDARD : MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

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

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

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


The following attachments form part of this report:

Non-conformity Report(s) 

List of additional site(s) 

Report by Audit Team Leader

Name : MOHD ZULFAKAR BIN KAMARUZAMAN

Signature : 

Date : 6/04/2022 (PUBLIC SUMMARY)
9/03/2022 (FINAL)

Acknowledgement by Client's Representative

Name : Salwa Md Yazid

Signature : 

Date : 7/4/22

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SUMMARY OF AUDITS

Recertification audit				
On-site audit date :	8 th – 12 th August 2016		No. of auditor days :	13.5 Auditor days
Audit team :	Mohd Zulfakar Kamaruzaman (LA), Hazani Othman, Selvasingam T. Kandiah, Rozaimee Ab Rahman (Observer)			
No. of major NCR :	2	Indicator: 2.1.1, 4.7.2		Closing date : 11/10/2016
No. of minor NCR :	5	Indicator : 4.1.2, 4.7.5, 4.8.2, 6.6.2, 6.9.3		
Indicate the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers	Suppliers
	√			√
	Contract workers	NGOs	Govt. agency	Independent growers
	Indigenous people	Contractor	Others (Please specify)	
		√		
Supply base sampled :	Derawan Estate and Takau Estate			

Annual Surveillance Audit 1				
On-site audit date :	24 - 27 October 2017		No. of auditor days :	12
Audit team :	Hazani Othman, Rozaimee Ab Rahman, Mohd. Norddin Abd. Jalil			
No. of major NCR :	4	Indicator: 4.2.4 (f), 6.5.1, D3.2, D5.1		Closing date : 26/12/2017
No. of minor NCR :	2	Indicator : 4.1.2, 4.4.2		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers	Suppliers
	√		√	√
	Contract workers	NGOs	Govt. agency	Independent growers
	√			
	Indigenous people	Contractor	Others (Please specify)	
		√		
Supply base sampled :	Damai Estate and Sahua Estate			
Changes since the last audit :	Changed of company name from Sime Darby Plantation Sdn Bhd to Sime Darby Plantation Bhd.			
Report approved by :	Radziah Mohd. Daud		Approval date : 1/02/2018	

Annual Surveillance Audit 2				
On-site audit date :	3 – 7/09/2018		No. of auditor days :	16.0 auditor day
Audit team :	Amir B Bahari (LA), Mohd Zulfakar Kamaruzaman Rozaimee Ab Rahman Rahayu Dzulkifli			
No. of major NCR :	2	Indicator : 6.12.3 & 6.5.2		Closing date : 30/11/18
No. of minor NCR :	4	Indicator : 4.7.5, 4.8.2, 6.5.4 & 6.1.4		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers / Local communities	Suppliers
	√		√	√
	Contract workers	NGOs	Govt. agency	Independent growers
	√		√	
	Indigenous people	Contractor	Others (Please specify)	
	NA	√		
Supply base sampled :	All – Derawan, Sahua, Takau & Damai Estate			
Changes since the last audit :	Derawan CU has converted their POM supply chain model from IP to MB. The verification audit has been carried out on 29/08/2018 and received RSPO EB approval on 2/09/2018.			
Justification of audit planning :	The total allocation of auditor days for Derawan CU were: 16 auditor days Mill = 4 days (3 day for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems). There was four (4) estates audited namely Derawan, Sahua, Takau and Damai			

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	Estates. A three (3) man-day each was allocated for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.	
Report approved by :	Radziah Mohd. Daud	Approval date : 12/12/2018

Annual Surveillance Audit 3

On-site audit date :	7 th – 10 th October 2019	No. of auditor days :	21
Audit team :	Selvasingam T Kandiah, Mohd Zulfakar Kamaruzaman, Rozaimie Ab Rahman, Amir B Bahari & Ismail Adnan Bin Abdul Malek		
No. of major NCR :	2	Indicator: 4.7.3 & 4.7.5	Closing date : 20/12/2019
No. of minor NCR :	0	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	Contractor	Others (Please specify)
		√	Sundry shop operators/restaurants
Supply base sampled :	All: Derawan, Sahua, Takau & Damai Estates		
Changes since the last audit :	There had been major transfers among Managers and Assistant Managers in the Derawan CU in 2019.		
Justification of audit planning :	The total allocation of auditor days for Derawan CU were: 21 auditor days Mill = 5 days (4 day for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems). There was four (4) estates audited namely Derawan, Sahua, Takau and Damai Estates. A three (4) man-day each was allocated for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.		
Report approved by :	Kamini Sooriamoorthy	Approval date : 6/01/2020	

Annual Surveillance Audit 4

On-site audit date :	13-15 October 2020 (Remote)	No. of auditor days :	7
Audit team :	Mohd Ab Raouf bin Asis (LA), Dzulfikar bin Azmi, Mohd Zulfakar bin Kamaruzaman		
No. of major NCR :	-	Indicator: -	Closing date :
No. of minor NCR :	-	Indicator : -	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers organizations	Settlers	Villagers / Local communities
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
			Independent growers / Smallholders
	Indigenous people	Contractors	Others (Please specify)
Supply base sampled :	Derawan Estate, Sahua Estate, Takau Estate, Damai Estate		
Changes since the last audit :	No changes		
Justification of audit planning :	Total allocation of auditor days for Segamaha CU were: <ul style="list-style-type: none"> • Mill = 1 days (For safety and health, environment, mill best practices, GHG verification and for supply chain certification systems) • All estate = 1.5 days each for verification of safety and health, environment, good agriculture best practices, GHG verification. 		
Report approved by :	Kamini a/p M. Sooriamoorthy	Approval date : -	

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Recertification Audit (2021) combine with ASA 4 (2020) onsite				
On-site audit date	:	13-18 December 2021 (Onsite)	No. of auditor days :	28
Audit team	:	Mohd Zulfakar bin Kamaruzaman (LA), Dzulfiqar bin Azmi, Mohd Ab Raouf bin Asis, Amir Bahari, Rohazimi Mat Nawi, Rozaimee Ab Rahman		
No. of major NCR	:	1	Indicator: 3.8.7	Closing date : 7/03/2022
No. of minor NCR	:	2	Indicator : 2.2.2, 3.3.2	
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	Contractor	Others (Please specify)
		✓	Sundry shop operators/restaurants	
Supply base sampled	:	All: Derawan, Sahua, Takau & Damai Estates		
Changes since the last audit	:	There had been major transfers among Managers and Assistant Managers in the Derawan CU in 2020.		
Justification of audit planning	:	<p>The total allocation of auditor days for Derawan were: 28 auditor days (combine with Recertification Audit)</p> <p>Mill = 6 days (5 day for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems).</p> <p>There was four (4) estates audited namely Derawan, Sahua, Takau and Damai Estates. A five and half (5.5) man-day each was allocated for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.</p>		
Name of Peer Reviewer	:	Prof. Emeritus Dr. Jalani Sukaimi		
Report approved by	:	Kamini Sooriamoorthy	Approval date : 6/04/2022	

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SUMMARY OF INFORMATION

TABLE 1

	STAGE 2/ RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Dec 2021 – Nov 2022			Aug 2019 – July 2020	Aug 2020 – Nov 2021
Certified FFB Processed (MT)	140,196.69			121,626.54	140,807.54
Production of Certified CPO (MT)	35,049.17			25,419.95	30,954.554
Production of Certified PK (MT)	7,104.03			5,473.19	7,317.106
Certified Areas (Ha)	*9,528.83			9,528.83	9,528.83
Planted Areas (Ha)	*8,295.59			8,257.93	8,295.59
Production Areas (Ha)	6,972.59			5,900.84	6,754.23
HCV Areas / Conservation Areas (Ha)	333.70			333.70	333.70
REMARKS	Derawan CU has confirmed that these certified areas figures were provided by the SDP Land Management Department. It has been noted that these figures included the portion shared between Derawan CU and estates under Rajawali CU. For information there were 5 titles across Damai, Sahu and Derawan Estates that has shared portion with estates under Rajawali CU. As for RSPO reporting, the total certified area shall follow the total title declared by the Land Management Department's figure and titles recorded at their end as the final figures. The email between the CU and the SDP Land Management was sighted.				

TABLE 2

	PO	PK
**Last years certified volume (MT)	*39,039.75	*9,224.52
Last years actual certified sold (MT)	30,081.294	7,090.515
Last years actual sold under other schemes (MT)	N/A	N/A
Last years sold conventional (MT)	0	0
Last year actual sold CSPO credits (where applicable)	0	0
New year certified volume (MT)	35,049.17	7,104.03

**Volume extension in Dec 2021 CPO (9,880.72MT) and PK (2,413.24MT)*

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1.0 AUDIT PROCESS

1.1 Certification Body

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

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & ISO 45001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and re-accredited by ASI on 3 October 2019 (accredited 2014).

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Zulfakar bin Kamaruzaman	Lead Auditor / Supply Chain, Social, HCV	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C and RSPO Supply Chain.
Mohd Ab Raouf Asis	Auditor / Social, TBP	Obtained qualification in B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM in 2007. He has been in the plantation industry for 7 years assisting Estate Manager managing palm oil estates. He has been trained as RSPO as well as MSPO auditor.
Amir B Bahari	Auditor, Good Agriculture Practice, Occupational health and safety & Environment	Possessed B Sc (Hons) USM and Diploma Palm Oil Milling Technology/Management 1996 MPOB. Working experience for 30 years in the oil palm industry including in the mill and estates. A qualified RSPO P & C Auditor with experience in ISO, EMS and RSPO/MSPO auditing.
Rozaimee Ab Rahman	Auditor / Occupational health and safety & Environment & GHG	Holds a B. Sc. of Agriculture from UPM. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO.
Dzulfiqar Azmi	Auditor / Safety & Environment, Social,	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He has experience in auditing since 2018. He is trained as an RSPO Lead Auditor.
Rohazimi Mat Nawi	Trainee Auditor Safety & Environment	Hold B. Sc (Hons) Chemical_Gas Engineering from Universiti Teknologi Malaysia. He has been in the Plantations Industry with various company having served in Palm Oil Mill more than 5 years. He was qualified in the auditing line with experienced in Sustainability (MSPO), QMS, EMS, OHSMS and RSPO/MSPO Supply Chain audit.

1.3 Audit methodology

The audit covered the Derawan Palm Oil Mill and 4 of its 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 4 supply base are Derawan Estate, Damai Estate, Sahu Estate and Takau 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 initiated the stakeholder consultation by announcing the invitation in the RSPO and SIRIM QAS International's websites in 26/11/2020. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs). The stakeholder consultation process is carried out during initial compliance and recertification audit only.

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> <p>The following were confirmed during the conduct of audit as there was no evidence to prove otherwise:</p> <ol style="list-style-type: none"> All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in English/Bahasa as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer. They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. They have been getting salaries above or at least RM1,200 since Jan 2020. It was depend on the productivity and out turn, however the employees understood on the system. Salaries were paid before the 7th of every month via bank transactions and cash. The company is in progress to fully implemented salary to bank in into each respective employees. No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment. No discrimination between migrant workers and local workers, between male and female workers. Comfortable housing with water and electricity provided. Local workers choose to stay in their houses in the nearby villages. Have access to affordable food from the canteen/sundry shops within the estate/mill premises. Entitled to free medical facilities at the estate clinic. Have representatives who attend regular meetings with the management where they can

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		<p>put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects.</p> <p>j. They knew the types of work offered at mill & estate when they were in their own countries.</p> <p>k. All migrant workers keep their own passports.</p> <p>l. NCR has been issued in indicator 1.1.2 on the monitoring of pregnancy of female employees.</p>	
2) Settlers		Not applicable.	
3) Villagers / Local communities (including women representatives, displaced communities)		<ul style="list-style-type: none"> ▪ Confirmed there is no land dispute between Derawan CU and neighbouring estates. ▪ No social issues arising from estate workers. ▪ Occasionally are called to attend meetings by Derawan mill and estates. The last one was held few months ago. ▪ All stakeholders were Invited to attend RSPO/MSPO briefings and stakeholder meetings. ▪ Derawan CU is operating harmoniously with surrounding oil palm smallholdings ▪ No issue about pollution. ▪ Some workers who work at Derawan CU come from neighbouring places around the mill/estates. 	
4) Suppliers		<ul style="list-style-type: none"> ▪ Derawan CU and supplier contract were signed by both parties. Suppliers would be contacted to supply hardware items as and when the need arises. FFB transporter's service was needed when required. This happens approximately once in two months for suppliers but daily for transporters. ▪ Fair dealings with the units in Derawan CU. ▪ Payments are made within 1 months 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		<ul style="list-style-type: none"> ▪ No indigenous peoples living near the Derawan CU. ▪ No land claims/disputes and no social issues. ▪ Harmonious co-existence with relevant stakeholders. ▪ Document review showed officers of the relevant Government agencies especially the Jabatan Tenaga Kerja Bintulu had good working relationship with Derawan CU. ▪ Government agencies also confirmed no offenses incurred by Derawan CU. 	
8) Independent growers / Smallholders		NA	
9) Indigenous people		NA	
10) Contractor		<p>All Contractors had provided services to Derawan mill/estates for the past 4-5 years. Each signed a contract and understood contractual obligations and the need to comply with legal requirements.</p> <ul style="list-style-type: none"> ▪ Fair dealings with the units in Derawan CU. ▪ Payments are made within 1 months of invoice. ▪ For transporter contractor, the estate mandore and staff will verify the work the contractor has done before his invoice can be approved for payment. ▪ All contractors' workers had attended MSPO training, 	

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	<p>signed COBC commitment statement and safety briefing. The Company provides PPE (vest, goggles, straw hat)</p> <ul style="list-style-type: none"> ▪ Suppliers of hardware and spare parts invoices were based on agreed quoted prices. ▪ Payment to contractors were made usually within 45 days of invoice. Renewal of contract is via tender system. ▪ Contractor and his workers knew about the minimum wages order requirement the workers make statutory contributions such as EPF and SOSCO. Workers details including names, pay slips, were presented for verification. ▪ Contractor removes domestic waste from workers' quarters, provide recycling services. Signs annual contract. Terms and conditions are clear and fair. Payments are received within one month. ▪ All contractors also attended stakeholder meetings. ▪ Contractors provide to the estate's copies of their worker details and payslips.
11) Previous land owner (if any)	No issues
12) Others (please specify)	No issues

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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

The Derawan Certification Unit (CU) is one of the Strategic Operating Unit (SOU) of Sime Darby Plantation Sdn Bhd (SDPSB). The CU is in Bintulu, Sarawak, East Malaysia and known as SOU 33. The CU consisted of one palm oil mill, the Derawan Palm Oil Mill (DPOM) and four supply bases, namely, Derawan Estate, Damai Estate, Sahu Estate and Takau Estate. All Estates belong to SDPB. DPOM commenced operations in 1994 with a processing capacity of 40 metric tonnes of FFB per hour. The total combined land area of the four estates is 9,528.83 hectares (Ha) of which 8,295.59 Ha planted with oil palm. All the estates have been fully developed before 2005, hence Principle 7 of the RSPO P&C is therefore not applicable.

The CU does not have other management system certification other than 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 (Aug 2020 to Nov 2021)

Estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Derawan Estate	36,924.44	25.80	SIRIM
Takau Estate	44,514.94	31.11	SIRIM
Damai Estate	30,596.88	21.38	SIRIM
Sahu Estate	28,771.28	20.11	SIRIM
Subtotal	140,807.54	98.4	
Third parties	2,290.89	1.60	
Total	143,098.43	100	

Table 2: Projected FFB production by supply base for the next reporting period (Dec 2021 to Nov 2022)

CU own estates	FFB Contribution		Certifying CB
	Tonnes	Percentage (%)	
Derawan Estate	32,904.16	23.47	SIRIM
Takau Estate	48,998.74	34.95	SIRIM
Damai Estate	26,959.82	19.23	SIRIM
Sahu Estate	31,333.97	19.29	SIRIM
Total	140,196.69	96.85	
Third parties	3,600.00	3.15	
Grand Total	143,796.69	100	

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**Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period
(Aug 2019 – July 2020 & Aug 2020 to Nov 2021)**

RSPO Supply Chain Model: Mass Balance	Aug 2020 -Nov 2021	Aug 2019-July 2020
FFB Received	143,098.43	119,519.630
FFB Processed	143,098.43	119,519.630
Certified FFB Processed	140,807.54	117,441.29
Non-certified FFB Processed	2,290.89	2,078.34
Crude Palm Oil (CPO)		
Overall CPO Production	30,954.554	25,363.440
Certified CPO Production	30,459.724	24,922.83
Non - Certified CPO Production	494.83	440.61
Certified CPO delivered as RSPO	30,081.294	24,831.26
Certified CPO delivered as non-RSPO	0	0
Certified CPO delivered under other sustainable schemes	0	0
Palm Kernel (PK)		
Overall PK Production	7,317.106	5,713.767
Certified PK Production	7,200.271	5,614.41
Non - Certified PK Production	116.835	99.35
Certified PK delivered as RSPO	7,090.515	5,614.41
Certified PK delivered as non-RSPO	0	0
Certified CPO delivered under other sustainable schemes	0	0
Credits traded through Books and Claim	0	0

**Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period
(Dec 2021 to Nov 2022)**

RSPO Supply Chain Model: Mass Balance	Total (MT)
FFB Received	140,196.69
FFB Processed	140,196.69
Certified FFB Processed	140,196.69
Non-certified FFB Processed	0
Certified CPO Production	35,049.17
Certified PK Production	7,104.03

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Derawan Estate	2244.77	2490.79
Takau Estate	2078.48	2107.00
Damai Estate	1899.05	2287.04
Sahua Estate	2073.29	2644.00
Total	8295.59	9528.83

Table 6 Planting profile for *SOU Derawan*

<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>
Derawan Estate	2020	2 nd cycle		319.35	319.35		14.23
	2019	2 nd cycle		196.50	196.50		8.75
	2018	2 nd cycle	178.93		178.93	7.97	
	2017	2 nd cycle	172.49		172.49	7.68	
	1994	1 st cycle	361.70		361.7	16.11	
	1995	1 st cycle	116.49		116.49	5.19	
	1996	1 st cycle	68.23		68.23	3.04	
	2012	2 nd cycle	179.58		179.58	8.01	

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	2013	2 nd cycle	123.75		123.75	5.51	
	2014	2 nd cycle	239.08		239.08	10.65	
	2015	2 nd cycle	288.67		288.67	12.86	
Sub Total			1728.92	515.85	2244.77	77.02	22.98
Damai Estate	1997	1 st cycle	105.14	0	105.14	5.54	0
	1998	1 st cycle	413.68	0	413.68	21.78	0
	2014	2 nd cycle	97.23	0	97.23	5.12	0
	2015	2 nd cycle	333.19	0	333.19	17.55	0
	2016	2 nd cycle	295.56	0	295.56	15.56	0
	2017	2 nd cycle	239.99	0	239.99	12.64	0
	2018	2 nd cycle	58.87	0	58.87	3.10	0
	2019	2 nd cycle	0	0	0	0	0
	2020	2 nd cycle	0	237.95	237.95	0	12.53
	2021	2 nd cycle	0	117.44	117.44	0	6.18
Sub Total			1543.66	355.39	1899.05	81.29	18.71
Takau Estate	2020	2nd cycle		162.73	162.73		7.83
	2019	2nd cycle		161.44	161.44		7.77
	2018	2nd cycle	236.11		236.11	11.36	
	2017	2nd cycle	201.46		201.46	9.69	
	2016	2nd cycle	172.16		172.16	8.28	
	2014	2nd cycle	181.52		181.52	8.73	
	2013	2nd cycle	185.23		185.23	8.91	
	1995	1st cycle	777.83		777.83	37.42	
Sub Total			1754.31	324.17	2078.48	84.40	15.60
Sahua Estate	2020	2nd cycle		181.59			
	2018	2nd cycle	224.74		224.74	10.84	
	2017	2nd cycle	237.16		237.16	11.44	
	2016	2nd cycle	153.57		153.57	7.41	
	1998	1 st cycle	770.58		770.58	37.17	
	1995	1 st cycle	219.36		219.36	10.58	
	1994	1 st cycle	254.19		254.19	12.26	
	2000	1 st cycle	32.1		32.1	1.55	
Sub Total			1891.7	181.59	2073.29	91.24	8.76
Grand Total			6972.59	1323.00	8295.59		

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

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

3.0 AUDIT FINDINGS

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

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 Systems for P&C and RISS, Nov 2020

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

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

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

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

If no, please state reasons NA

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

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

No changes

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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 4)

List : 2

DA 01 2021 (2.2.2), MAR 01 2021 (3.3.2)

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

List : Nil

4.2 For SC (Details checklist refer to Attachment 3) :

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

List : Nil

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

List : 1

NCR MZK 01 2021 (3.8.7)

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 :

MOHD ZULFAKAR BIN
KAMARUZAMAN

(Name)



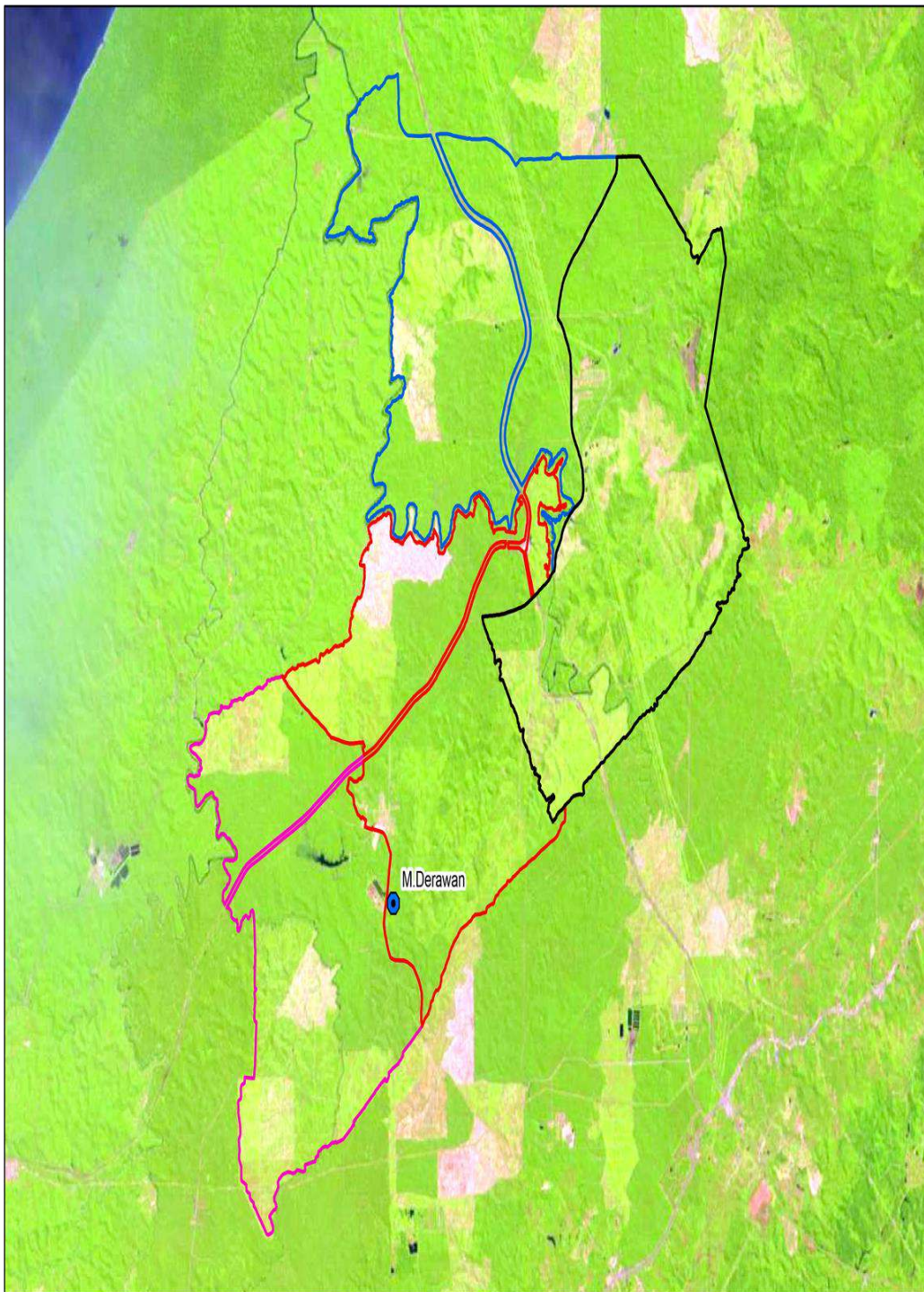
(Signature)

7/03/2022

(Date)

Attachment 1 - Map

Map of SOU Derawan



SOU Boundary Map



1:72,654



0 700 1,400 2,800 Meters

Legend

-  Derawan Mill
-  E. Damai
-  E. Derawan
-  E. Sahua
-  E. Takau

Datum/Spheroid: WGS 1984/WGS 1984
 Projected Coordinate System: UTM Zone 47N
 Spatial Resolution: 30m GSD
 Image Reference/Cloud Cover: LC8106572014RSLDND01 20%
 WGS Point / File: 129 / 057 (Derawangi)
 Date Acquired: 2014-07-02
 Software: ArcGIS 10.4.1
 Paper Size: A3 (11.69" x 16.54")
 Prepared by: Sustainability Unit (SUU)
 Date Prepared: 2017-11-28

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 : 13-18 December 2021

3. Site of assessment : SOU Derawan

- Derawan Palm Oil Mill
- Derawan Estate
- Takau Estate
- Sahu Estate
- Damai 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) Audit Team Leader : **Mohd Zulfakar bin Kamaruzaman (MZK)** - TBP, SCCS, HCV, Social (Mill), Social (External Stakeholder)
- b) Auditors : - Rozaimie Ab Rahman (RAR) - Safety (Mill), Environment (Mill), GHG, Matric Template (Mill)
 - Dzulfikar Azmi (DA) – Safety (Estate), Social (Estate)
 - Amir Bahari (AB) – Safety (Estate), GAP
 - Rohazimi Mat Nawi (RMN) - Safety (Estate), Environment (Estate), Metric Template (Estate)
 - Mohd Ab Raouf bin Asis (MAR) - Social (Estate)
- 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 out come-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 according to this period:

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

The updated Metrics Template (as attached, the version 2.0) 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

Date / Time	Coverage of assessment / Activity / Site	MZK	RAR	AB	MAR	DA	RMN
Day 1-13/12/21 8.30am – 9.00am	Opening Meeting – Venue: Derawan POM <ul style="list-style-type: none"> Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases , Time bound plan, actions taken to address previous audit findings. 	/	/	/	/	/	/
9.00am – 12.30pm	Site observation to Damai Estate P1, P2, P3,P4,P5, P6, P7 <ul style="list-style-type: none"> Verification of basic information estate/Metric templates Confirmation of time bound plan & review of partial certification Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. GHG Calculation New planting 			/	/	/	/
9.00am – 12.30pm	Site observation to Derawan POM P1, P2, P3,P4,P5, P6, P7 <ul style="list-style-type: none"> Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the POM Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Occupational safety & health aspects, chemical management Good Milling Practice Legal & Other requirement RSPO Supply chain standard implementation including model requirements Environmental management, waste & chemical management • GHG Calculation 	/	/				
12.30pm – 1.30pm	Lunch Break						
1.30pm – 5.00pm	Continue assessment at respective sites	/	/	/	/	/	/

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Date / Time	Coverage of assessment / Activity / Site	MZK	RAR	AB	MAR	DA	RMN
Day 2 – 14/12/21 8.30am – 12.30pm	Site observation to Sahua Estate P1, P2, P3,P4,P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. • GHG Calculation • New planting 			/	/	/	/
9.00am – 12.30pm	Site observation to Derawan POM P1, P2, P3,P4,P5, P6, P7 <ul style="list-style-type: none"> • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the POM • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Occupational safety & health aspects, chemical management • Good Milling Practice • Legal & Other requirement • RSPO Supply chain standard implementation including model requirements • Environmental management, waste & chemical management • GHG Calculation 	/	/				
12.30pm – 1.30pm	Lunch Break	/	/	/	/	/	/
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/	/	/

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Date / Time	Coverage of assessment / Activity / Site	MZK	RAR	AB	MAR	DA	RMN
Day 3 – 15/12/21 8.30am – 12.30pm	Site observation to Derawan Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. 			/	/	/	/
	<ul style="list-style-type: none"> • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. • GHG Calculation • New planting 						
8.30am – 12.30pm	Site observation to Damai Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Stakeholder consultation with affected communities surrounding the estate • GHG Calculation 	/	/				
12.30pm – 1.30 pm	Lunch Break	/	/	/	/	/	/

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1.30pm – 5.00pm	Continue assessment at respective site (MZK And RAR go to Sahua Estate) Site observation to Sahua Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Stakeholder consultation with affected communities surrounding the estate • GHG Calculation 	/	/	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	MZK	RAR	AB	MAR	DA	RMN
Day 4 – 16/12/21 8.30am – 12.30pm	Site observation to Takau Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. 			/	/	/	/
	<ul style="list-style-type: none"> • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. • GHG Calculation • New planting 						
12.30pm – 1.30 pm	Lunch Break	/	/	/	/	/	/

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1.30pm – 5.00pm	Continue assessment at respective site (MZK And RAR go to Derawan Estate) Site observation to Derawan Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Stakeholder consultation with affected communities surrounding the estate • GHG Calculation 	/	/	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	MZK	RAR	AB	MAR	DA	RMN
Day 5 – 17/12/21 8.30am – 12.30pm	Auditor continue unfinished assessment at All Estate (will inform at the morning which estate) P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. • GHG Calculation • New planting 	/	/	/	/	/	/
12.30pm – 1.30 pm	Lunch Break (Friday Prayer)	/	/	/	/	/	/
2.30pm –3.00pm	Continue assessment at respective site	/	/	/	/	/	/
2.30pm –4.00pm	Audit Team Discussion	/	/	/	/	/	/
4.00pm – 5.00pm	Closing meeting at Takau/Derawan Estate LA will stay for finising Supply Chain Assessment	/	/	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	MZK	RAR	AB	MAR	DA	RMN
Day 6 – 18/12/21	Site observation to Derawan POM	/	-	-	-	-	-

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8.30am – 12.30pm	P3 <ul style="list-style-type: none"> Legal & Other requirement RSPO Supply chain standard implementation including model requirements 						
12.30pm – 1.30 pm	Lunch Break	/	-	-	-	-	-
2.30pm –3.00pm	Continue assessment at respective site	/	-	-	-	-	-
2.30pm –4.00pm	Audit Team Discussion	/	-	-	-	-	-
4.00pm – 5.00pm	Closing meeting	/	-	-	-	-	-

Note: Please note that the Audit Plan merely serves as a guide and there may be changes as the audit progresses

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Attachment 3

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

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	Documented communication procedure at Derawan CU continued to be implemented. At the time of the audit all requests for information from the stakeholders had being recorded. All the estates and mill audited provide availability of management documents i.e. related to environment, and social and legal issues to the public except for those prevented by commercial confidentiality or where disclosure of information that would potentially result in negative environmental or social outcomes. SDPB continued to use website for disseminating public information which are available in the company's website http://plantation.simedarby.com . Information among others in relation to the following; land titles, safety and health plans, pollution prevention plans and procedure for complaints and grievances.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	SOU Derawan had identified personnel responsible for handling of complaints. Records of communication were maintained at respective offices. Communication with the authority such as DOSH, DOE and Labour Department were maintained in the communication file. At the point of this assessment, there has been no request for such information by the public. Among the records inspected were correspondences with the authorities, local communities and employees. The latest communications sighted in these records, Buku Aduan, was request for repairs at employee housing.
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	SOU Derawan had identified personnel responsible for handling of complaints. Records of communication were maintained. Communication with the authority such as DOSH, DOE and Labour Department were maintained in the google drive. At the point of this assessment, there has been no request for such information by the public. Among the records inspected were correspondences with the authorities, local communities and employees. The latest communications sighted in these records, Buku Aduan, was request for repairs at employee housing.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	The consultation and communication procedures were documented. External and internal communication procedures developed by Sime Darby Plantation for the estates and mill maintained to be followed and available at the audited sites. Consultation and communications procedures for SOU Derawan is documented <i>as above Oil Palm Palm Digital Housing Complaint system, Responsible, Authority & communication System (MQMS)</i> . This document and records were sighted during the audit. An examination of the

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Clause	Indicators	Comply Yes/No	Findings
			records kept in the internal and external communication files found that the estates 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. Regular morning briefings were used by the management to communicate policies, procedures, rules and regulations and other information to its employees. In the case of external communications, they were mainly in the form of correspondence, which were kept in the External Communication File
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	The list of stakeholders for the Mill and Estates in SOU 33 Derawan was maintained by the respective sites. The stakeholders comprise of contractors, vendors/suppliers, neighbouring estates/smallholders, government agencies, clinics, hospitals, etc. The Stakeholders lists for the Mill and Estates in SOU 33 Derawan CU were verified by the auditor.
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	Units within the SOU 33 Derawan 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 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. In addition to the COBC, Sime Darby Plantation Group also has a Vendor COBC (VCOBC). The Vendor COBC applies to all its suppliers, consultants, agents, contractors /service providers who have direct dealings with the Group. The VCOBC outlines the standards of behaviour required of all its vendors which includes in relation to labour and human rights, ethics and management practices. Vendors too are required to sign Vendor Integrity Pledge which includes a declaration to eradicate all forms of exploitation, including but not limited to modern day slavery and human trafficking.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	The system in place to monitor compliance and implementation of the Policy and overall business conducts include trainings and internal audits conducted by the Group Integrity & Group Assurance Unit from HQ. Training for managers, assistant managers and executives which was held for the Derawan region.

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Principle 2: Operate legally and respect rights

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

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	YES	It was evident that Derawan CU continue to comply with most of the applicable laws and regulations.
	s2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	YES	The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them. Each estate and mill had its own Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the person in-charge and approved by the respective managers. The SQM Department is responsible to track changes and the information was disseminated to all its plantations and Mill department.
	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	The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 4 estates, during the field inspection confirmed that they were clearly marked and maintained.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	YES	List of contractor parties were maintained at Estates and Mill at the SOU Derawan. These were all maintained and updated accordingly as of Jan 2021. The list contain details of the stakeholders, addresses and contact details. All operating unit in the SOU 33 Derawan have listed and maintained all contracted parties and documented in the List of Stakeholders as part of their external stakeholders.
	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.	NO	It has been noted that one of the FFB transporter did not comply with Labour Ordinance Sarawak Act A1237 (Amended as at 10/02/2005), Section 105D, 105E. During interview with contractor workers (FFB Lorry Driver), it was not evident that the workers have been paid as per above regulation i.e. Annual leave entitlement pay and Paid Sick Leave. In the meantime, based on verification of pay slips (Sep. 2021 to Nov. 2021), sighted the payment of wages was paid after 7 th of the following month which not complied with for Section 109. Hence, Minor NCR DA 01 2021 was raised.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the	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.

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Clause	Indicators	Comply Yes/No	Findings
	contracts include a clause for their protection.		
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	SOU Derawan has documented the following for the directly source of FFB: <ul style="list-style-type: none"> a) Information on geo-location of FFB origins. b) Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder The evidence of currently document is available in the 'Smallholder Mapping' file. the mill only possessed the valid MPOB licenses for all the directly source FFB as verified by the auditor.
	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	Currently in Derawan POM there is no practice of indirectly source of FFB. All FFB are received direct from the suppliers

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	As per all SDPB, Derawan CU continued to have documented business plans with projections until the financial year 2024. At the estates, the budget provisions covered activities for <ul style="list-style-type: none"> upkeep, cultivation, harvesting & evacuation, welfare, RSPO compliance, etc. CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses Attention was given to crop projection, cost of production, cost per ton and per hectare

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Clause	Indicators	Comply Yes/No	Findings
			<p>indicators to monitor the performance of each operating unit. The cost of production was reviewed and compared against expenditure each year with projections in place for future years</p> <p>The mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains;</p> <ul style="list-style-type: none"> • FFB yield & CPO production forecast • Extraction Ratios – OER / KER, • Cost of production • EVIT running accounts • CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	Derawan CU had established and documented a management plan (budget) inclusive of a long-range replanting (LORR) program from 2020 to 2030. This management plan inclusive of the replanting program was reviewed annually. The decision for replanting was based on factors like FFB crop availability for the mill, Yield, Height & Age of palms, market price of CPO, etc.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	<p>Management has transparent to address continuous suitability, adequacy and effectiveness of the requirements for effective implementation of RSPO. Among others the agenda discussed were:</p> <ol style="list-style-type: none"> a) Internal audit findings b) Stakeholders feedback, c) complaint and grievance d) Status of preventive and corrective actions e) Changes that could affect the management system f) Recommendation for improvement <p>Generally, the meeting discussed on the effectiveness of the present management system and policies. Members also focused on the forthcoming external audit and also the status of previous findings closure.</p>
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental	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	Continuous Improvement Plan has been implemented dated Jan 2020. The improvement plans outlined issues highlighted as per in the EAI as well as other reporting means i.e., internal audit as well as external audit.

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Clause	Indicators	Comply Yes/No	Findings
performance and develops and implements action plans that allow demonstrable continuous improvement in key 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	Submitted to the RSPO metrics template to the audit team accordingly.
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 Derawan continued to use and implement SOPs for each of the processes. Brief version of the SOPs was displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOPs.</p> <ul style="list-style-type: none"> • Agriculture Reference Manual (ARM) dated 01/07/2011, • Estate Quality Management System (EQMS) Manual dated 01/11/2008, • Safety Standard Operating Procedures (SSOP) dated 25/02/2015, • Sustainable Plantation Management System Manual (SPMS), • "Guidelines on River Management" Manual, ESH Management System Manual dated 01/07/2012, • Occupational Safety and Health Manual dated 03/03/2008, • Pictorial Safety Standards, and Security Guidelines (PSS). • Plantations / Mill Quality Management System (PQMS / MQMS) standard operating manual • Laboratory Process Control Manual • Security Guidelines
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	NO	<p>Derawan SOU checks the implementation of procedures were carried out through RSPO internal audit report on visits made in Sept 2020 by RSQM team, safety and health meeting and routine inspection (workplace inspection) by assistant manager, staff and hospital assistant. In addition, the mechanisms to check the implementation of procedures were further carried out in pom through the Mill Structured Oil Recovery Assessment (SORA). However, a mechanism to check consistent implementation of procedures was not in place i.e.,</p> <ol style="list-style-type: none"> 1. Monitoring on pregnancy female employees at Derawan and Takau Estate. 2. Monitoring on employee attendance especially female employees who is give childbirth Interview held with Medical Assistant and verification of records at Takau Estate clinic, no evidence of records on female employees who is currently pregnancy. Based on checkroll records and daily input on 2 female employees, who is just give childbirth on Sep 2021 and Dec 2021, daily outturn (on Sep, Oct and Nov) was key in as working, but in actual

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Clause	Indicators	Comply Yes/No	Findings
			facts they were not working due to maternity leave. Therefore, minor NCR raised as MAR 01 2021.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	<p>The implementation of SOP are monitored on a daily basis by the field staffs and Assistant Managers with overall overview by the Managers. The monitoring is made via supervision and records maintenance. The estates among others maintained the following records.</p> <ul style="list-style-type: none"> a) work program / Field cost books b) bin cards, Harvesting Intervals, c) Monthly Estate Report and Account, d) Monthly Operations, monthly rainfall, e) pest and diseases monthly return, f) agrochemical monthly consumption g) harvesting details i.e. daily inspection report - yield improvement program, h) summary of machinery running hours i) harvesting records detailing the number of bunches harvested j) quantity of loose fruit collected by each harvesters. k) Monthly FFB production, etc.
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	<p>There is no change of current practices required to mitigate negative effects based on identified impacts for both the mill and estates. However, the mill and estates have conducted periodical review on the aspects and impacts identified and evaluated as registered.</p> <p>EIA has been reviewed in Sept 2021 by estate management with RSQM was related to additional for new operation of ESP. Management of POM conducted stakeholder meeting "Mesyuarat Kejiranan" to discuss and briefing related to impacts from mill operation to the environment. Sighted an evidence minute meeting has been carried out in Nov 2021. Meanwhile, management also conducted an internal meeting with employees to discussed related to environmental issues in the EPMC meeting. Among of the issues has been discussed related to SW management, zero burning practices, sustainable environmental management.</p> <p>Derawan CU has established its environmental aspects / impacts register associated with their activities. Environmental aspect and impact which covers form 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 most significant environmental receptors are the boiler stack emission which associated with air emission, palm oil mill effluent (POME) discharge and land contamination which related to managing the schedule waste and general waste. For the estate operation, all activities from harvesting, pest and disease, upkeep programme until delivery to mill has been identified.</p> <p>A Social Impact Assessment (SIA) covering 5 operating units namely Derawan Palm Oil</p>

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Clause	Indicators	Comply Yes/No	Findings
			Mill, Derawan Estate, Sahua Estate, Takau Estate and Damai Estate was carried out in Sept 2016 by the PSQM Unit of the Sime Darby Plantation. Records of meetings were documented and made available during the audit. Among the stakeholders who attended were workers, staff, workers' union, suppliers, contractors, community heads and teachers. Respective estate map, manpower statement, date of focus group discussions held, number of participants who attended each session, number of internal and external stakeholders consulted, stakeholders' perspectives, issues that were raised, and proposed mitigation/enhancement measures were included in the individual report for each estate. Potential impact factors covered included stakeholder mapping, employment conditions, living conditions, health & safety in the workplace, public health & safety, respect for human rights, communication with management, and community relations. Based on demographic assessment, there are 0 nearest villagers.
	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	Derawan CU has established its environmental aspects / impacts register associated with their activities. Environmental aspect and impact 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 most significant environmental receptors are the boiler stack emission which associated with air emission, palm oil mill effluent (POME) discharge and land contamination which related to managing the schedule waste and general waste. For the estate operation, all activities from harvesting, pest and disease, upkeep programme until delivery to mill has been identified.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	YES	Derawan Palm Oil Mill management consultation with stakeholders was held in Nov 2021 included in the attendees list sighted were representatives from contractors, Villagers workers, NGO's, Government Agency. For Estates, it was evident that the reviews of the Action Plan were developed following inputs and feedbacks from affected parties. The inputs were then incorporated into a document with timetables and names of persons in charge. Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, were developed.
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	YES	Employment procedures for recruitment, selection, hiring, are documented. For locals, the procedures are in SOP on Hiring of Local workers, known as Doc No 01-11-19. The procedure details out the process of hiring (application form, screening, interview, requisition approval from Regional GM, medical check-up and issuance of letter of offer). Employment procedures for retirement and termination are available in the local workers' employment contracts. Similarly, foreign workers' contracts also contain provision for mutual termination. Retirement procedure is not applicable to foreign workers.

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Clause	Indicators	Comply Yes/No	Findings																									
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	Employment procedures are available. Evidence of implementation is available from workers' files such as application form, interview, medical test and issuance of letter of offer. Based on interview with employees, there was no issues with the employment procedures as stated in their agreement as when they were entering the company.																									
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	YES	The hazard identification, risk assessment and risk control (HIRARC) procedure has been established. Derawan CU have conducted the risk assessment on all its operation as well as determining their control measures.																									
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	The implementation of OSH plan was monitored by internal audits conducted by OSH officers from RSQM department. The OSHA plan among others initiated by the estates/mill are as follows; <table><tr><td></td><td>Task</td><td>Activity</td></tr><tr><td>1</td><td>OSH Legal Compliance</td><td>Review all relevant legal compliance</td></tr><tr><td rowspan="3">2</td><td rowspan="3">Emergency Response Plan</td><td>ERP Training</td></tr><tr><td>Fire drill</td></tr><tr><td>Enforcement Visit</td></tr><tr><td rowspan="2">3</td><td rowspan="2">OSH Management System</td><td>Review documentation</td></tr><tr><td>HIRARC review</td></tr><tr><td rowspan="3">4</td><td rowspan="3">Risk Management</td><td>Identify High Risk Area</td></tr><tr><td>Maintenance</td></tr><tr><td>Hygiene Tech</td></tr><tr><td rowspan="3">5</td><td rowspan="3">Accident Investigation/ Reporting</td><td>Accident Investigation</td></tr><tr><td>JKKP 8/6 submission</td></tr><tr><td>Chemical Register</td></tr></table>		Task	Activity	1	OSH Legal Compliance	Review all relevant legal compliance	2	Emergency Response Plan	ERP Training	Fire drill	Enforcement Visit	3	OSH Management System	Review documentation	HIRARC review	4	Risk Management	Identify High Risk Area	Maintenance	Hygiene Tech	5	Accident Investigation/ Reporting	Accident Investigation	JKKP 8/6 submission	Chemical Register
		Task	Activity																									
	1	OSH Legal Compliance	Review all relevant legal compliance																									
	2	Emergency Response Plan	ERP Training																									
			Fire drill																									
			Enforcement Visit																									
	3	OSH Management System	Review documentation																									
			HIRARC review																									
	4	Risk Management	Identify High Risk Area																									
Maintenance																												
Hygiene Tech																												
5	Accident Investigation/ Reporting	Accident Investigation																										
		JKKP 8/6 submission																										
		Chemical Register																										
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	YES	The training program for 2020 and 2021 covering all aspects of the RSPO Principles and Criteria and other essential operations activities has been established. Regular assessments of training needs were available and verified. Training needs identification matrix has been established with target dates for of implementation.																									
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	SOU continued to train its executives, staff and workers. Records of training were kept in the training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue.																									
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply	YES	Appropriate training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been conducted in Nov 2021, attended by 5 person including PIC, Clerk, Assistant Engineer, Staff,																									

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Clause	Indicators	Comply Yes/No	Findings
	Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.		Weighbridge Operator and Attendance list & photograph was seen.

SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	YES	Not Applicable, since DPOM is MB Model Mill
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 rd party certified supply base.	YES	Derawan POM received certified FFB from own Estate Which are Derawan, Damai, Sahua and Takau Estates and Uncertified FFB from Surrounding Smallgrower and Small holder. Thus, Derawan POM has qualifies for the Mass Balance chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.
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	YES	This has been made available, as in Table 4 of this report.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	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.		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	YES	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information was: Name: Derawan Oil Mill Country: Malaysia Member Category: Oil Mil Core product: Palm Oil
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable SC model specified. This shall include at min 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 	YES	<p>Derawan POM maintained their documented procedure title 'Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001'. The procedure was kept in file RSPO Supply Chain Manual (SCM/RSPO/SD) Appropriate changes were also made in the change to include the new clause Production of ISCC certified waste/residues materials at the mill. Appropriate training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been conducted in Nov 2021 attended by 5 person including PIC, Clerk, Assistant Engineer, Staff, Weighbridge Operator and Attendance list & photograph was seen.</p> <p>The Assistant Manager and QA had overall responsibility and authority over the implementation of RSPO supply chain requirement for Derawan POM. DPOM had continued to implement the procedures it had on receiving and processing of RSPO certified and non- certified FFBs. (Refer para. 7.0 of the SOP - Receiving FFB at the Mill) it has described how DPOM manages the FFB from certified source.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard.</p> <ul style="list-style-type: none"> The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 		
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, DPOM refer to Internal Audit Procedure, which is follow the RSPO Supply Chain Certification Standard Revision 2017 requirements.</p> <p>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 the internal audit team. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 0 NCR were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.</p> <p>Documented procedure has defined management review will be conducted once a year</p> <p>Management review meeting has been conducted on in Oct 2021 (combine RSPO, RSPO SCCS and MSPO)</p> <ul style="list-style-type: none"> Internal audit – 0 NCR (SCCS only) Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result achieved. Previous meeting – was highlighted Changes – There is no significant changes accept transfer of Assistant Manager. Recommendation for improvement – improve the established system

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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>	NO	<p>Derawan POM had continued to receive certified FFB from own Estate Which is Takau, Derawan, Sahua and Damai Estates. And Uncertified FFB from Surrounding Smallgrower and Smallholders. The validity of the certificate of the supplier has been checked accordingly. Sighted sample FFB consignment note for Takau, Derawan, Sahua and Damai Estates. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Monitoring records titled as “RSPO & MSPO Mass Balancing Records for Oil Mills” has recorded the tonnage of certified FFB and its supplying estate. Assessor has verify the Monitoring records titled as “RSPO & MSPO Mass Balancing Records for Oil Mills” has recorded the tonnage of certified FFB and its supplying estate. However, it was found that, SOU Derawan already overproduced their certified FFB, CPO and PK due to increase of FFB Production and 2 years without RSPO Audit and Sighted evidence there is overproduction of certified tonnage for CPO PK and Derawan POM has yet to inform the CB. The figure as below:</p> <table border="1"> <tr> <th></th><th>FFB</th><th>CPO</th><th>PK</th></tr> <tr> <td>Projected</td><td>140,728.89 mt</td><td>29,159.03 mt</td><td>6,811.28 mt</td></tr> <tr> <td>Actual</td><td>142,642.74 mt</td><td>30,443.114 mt</td><td>7,230.62 mt</td></tr> </table> <p>Thus, Major NCR MZK 01 2021 has been raised against this indicator.</p>		FFB	CPO	PK	Projected	140,728.89 mt	29,159.03 mt	6,811.28 mt	Actual	142,642.74 mt	30,443.114 mt	7,230.62 mt
	FFB	CPO	PK												
Projected	140,728.89 mt	29,159.03 mt	6,811.28 mt												
Actual	142,642.74 mt	30,443.114 mt	7,230.62 mt												

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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>SOU Derawan 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. 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>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	YES	<p>There are 2 outsource company CPO transporter. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. There is a clause regarding Supply chain in the 'annexure 5' of agreement. Record of training was sighted.</p> <p>The RSPO Supply Chain procedure has described on outsource activity and briefed to the contractor in Nov 2020. Inspection was carried out as additional effort to ensure no contamination sighted book from AP Post.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	YES	List of contact person for both transporters were made available and up to date in the stakeholder list.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	YES	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	YES	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up-to-date.
	ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	YES	Relevant record was maintained for more than 2 years as per Standard operating procedure for Sustainability Supply Chain and Traceability.
	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	Derawan POM has maintained the three-monthly accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record titled as <i>"RSPO & MSPO Mass Balancing Records for Oil Mill"</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	YES	The records of the volume purchased (input) and claimed (output) over a period of 12 months was updated in 'RSPO&MSPO Mass Balancing Records for Oil Mill'.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)		
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	Derawan 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	Extraction rates has been updated monthly as per stated in Monthly Production Report (Physical Movement)
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100%	YES	Global Trade Marketing (GTM) personnel updated the RSPO IT platform system upon confirmed contract, normally completed via the system within 3-month period after shipment or within the duration agreed by Mill's respective customer/ buyer. GTM shall updated the system based on input provided by Derawan POM (e.g. of input Projected & Actual FFB Processed template, Mass Balancing Records for Oil Mills (3 monthly), daily production summary report, monthly production summary report etc.)

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	separation.		Based on Derawan POM Palm Trace inventory system, they have sales certified materials to (CSPO & CSPK) to (Sime Darby Oil).
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform</p>	YES	<p>Derawan POM through Global Trade Marketing (GTM) personnel updated the RSPO IT platform system upon confirmed contract, normally completed via the system within 3-month period after shipment or within the duration agreed by Mill's respective customer/ buyer.</p> <p>GTM updated the system based on input provided by Derawan POM (e.g of input Projected & Actual FFB Processed template, RSPO Records for Oil Mills, daily production summary report, monthly production summary report etc.)</p>
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	YES	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Derawan POM has not use RSPO corporate logo as well as trademark logo. But further verification during onsite audit.

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Principle 4: Respect community and human rights and deliver benefits

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

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	YES	SDPB has established Group Sustainability & Quality Policy Statement, where the company is respecting, upholding & no exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC). The HRC was last revised in August 2020. They promote the human rights, safeguard democracy and its institutions and not violate the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, they are committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them. Refer to Policy on the Protection of Human Rights Defenders (HRDs) dated 25/03/2020 for more information. The policies were communicated to stakeholders during stakeholder meetings. It is also being explained during the induction course for the newly arrived workers. The Policy was communicated to stakeholders which included FFB suppliers during stakeholder meeting in Nov 2021. The Group has established a specific Policy on Human Right Defenders, Whistleblowers and Complainants and the Policy had been finalized by GSQM in March 2020.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	YES	There is no evidence that SOU Derawan instigates any violence or use any form of harassment in its operations. This was confirmed from interviews conducted with its employees from all levels (staff, workers, security personnel). This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers. Interviewed with the workers confirmed that no harassment by the management.
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 the SOU 33 Derawan in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Procedures for handling Social Issues". The Mill and Estates within the CU have 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. Anonymity of complainants and whistleblowers are ensured under the Sime Darby Code of Business Conduct which provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ.

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Clause	Indicators	Comply Yes/No	Findings
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	The documented system in dealing with complaints and grievances are briefed during muster briefing. To ensure that illiterate parties also understand the procedures, verbal briefings are given are translated into the language the affected parties understand. SDPB has implemented Flowchart and Procedure on Handling Social Issues. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing . Besides, the company has implemented "Suara Kami (Platform by Nestle)", "Impactt (Ulula)", "WMU Careline (From Region)" as a platform for the workers to raise any issue. The workers in Derawan CU were briefed on the complaint mechanism during morning muster and social dialog. Besides, external stakeholders were briefed during the stakeholder meeting. Interviewed with the internal and external stakeholders confirmed that they have been briefed and understood on the complaint mechanism implemented by the company.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	YES	Sighted the External Complaint Book have the agreed resolution within timeframe. There was no other major complaint other than housing maintenance issues. The complainant will fill in the complaint form and staff will summarize the issue in Rekod Aduan Kerosakan Rumah. The record captured the complainant issue; house no, complainant date, action taken date, contractor, staff and executive house. There is evidence that parties to a grievance are kept informed of the progress of the complaints. At POM Actions taken following complaints on house defects were informed to the complainants.
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	YES	SDPB has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing . Besides, the company has implemented "Suara Kami (Platform by Nestle)", "Impactt (Ulula)", "WMU Careline (From Region)" as a platform for the workers to raise any issue. Furthermore, the company developed the Human Rights Charter to protect Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally. Paragraph 7 of Appendix 5 Sustainable Plantation Management System, Flowchart and Procedure on Handling Social Issues, stated that upon failure of negotiation process involving estate management, representatives from the disputed parties, zone heads, third parties and stakeholders, legal proceedings may follow. 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	There is evidence that contributions to community development was provided based on consultations. There is a donation to the surrounding schools, Mosque and Government agencies. The most important thing is 80% of the staff and non-clerical staff are from surrounding villagers (radius 25km) which is the main Contributions to community development.
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. a) Takau Estate - the land was previous owned by Derawan Sdn Bhd and Sahua Enterprise Sdn Bhd and then transferred to Austral Enterprises Bhd, b) Derawan Sendirian Berhad and Sahua Enterprise Sdn Bhd has bought the land from Sarawak Government on 20 April 1988. c) Derawan Sendirian Berhad and Sahua Enterprise Sdn Bhd are owned by Golden Hope and after merged with Sime Darby in 2007, The Land Title was transferred under the name of Sime Darby Plantation Bhd. Each estate had legal use of the land through an Ownership signed by the Superintendent of Lands and Surveys of Bintulu 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	The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land.
	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	The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighbouring estate only. SDPB has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these	YES	The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighbouring estate only. SDPB has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from

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Clause	Indicators	Comply Yes/No	Findings
	decisions were taken.		conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.
	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 cert.'s title, concession or lease on the land.	YES	The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighbouring estate only. SDPB has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.
	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	The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighbouring estate only. SDPB has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighbouring estate only. SDPB has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.
	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	The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighbouring estate only. SDPB has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighbouring estate only. SDPB has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.

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Clause	Indicators	Comply Yes/No	Findings
			developed.
<p>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.</p>	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	YES	The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighbouring estate only. SDPB has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.
	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	The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighbouring estate only. SDPB has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	YES	The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighbouring estate only. SDPB has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.
	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	YES	The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighbouring estate only.

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Clause	Indicators	Comply Yes/No	Findings
	range of food and water provisioning options are considered. There is transparency of the land allocation process.		
	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	No new plantings are established on local peoples' land.in Derawan CU. The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighbouring estate only.
	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	No new plantings are established on local peoples' land.in Derawan CU. The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighbouring estate only.
	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	No new plantings are established on local peoples' land in Derawan CU. The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighboring estate only.
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	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	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes. The procedure has detailed process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department. The lands occupied by Derawan CU are government provision lease land. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or	YES	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes. The procedure has detailed process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties'

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Clause	Indicators	Comply Yes/No	Findings
express their views through their own representative institutions.	otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.		involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department. The lands occupied by Derawan CU are government provision lease land. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.
	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	The lands occupied by Derawan CU are government provision lease land. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.
	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	The lands occupied by Derawan CU are government provision lease land. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	YES	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes. The procedure has detailed the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department. The lands occupied by Derawan CU are government provision lease land. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	YES	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes. The procedure has detailed the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department. The lands occupied by Derawan CU are government provision lease land. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	The lands occupied by Derawan CU are government provision lease land. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.

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Clause	Indicators	Comply Yes/No	Findings
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	The lands occupied by Derawan CU are government provision lease land. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.
	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	The lands occupied by Derawan CU are government provision lease land. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).	YES	The lands occupied by Derawan CU are government provision lease land. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	YES	The lands occupied by Derawan CU are government provision lease land. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.

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Principle 5: Support smallholder inclusion

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	YES	Derawan POM has displayed the current prices paid for FFB at the mill's weighbridge counter.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	There is evidence that SOU Derawan regularly explains the FFB Pricing to Smallholders surrounding. Latest Training/briefing were conducted. The stakeholder information briefing concerned to FFB qualities, FFB grading, calculation payment by MPOB, oil extraction rate (OER). The calculation method of pricing was made known and given to the Smallholders. Field days were organised monthly by the mill to all the small holders from the supplying list.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	In Derawan POM Price for FFB adopted the MPOB Pricing. All prices are calculated by the MPOB, and the mill take the price and follow what MPOB guided.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	YES	There is no bound contract for FFB outside supplier sending crop to the Derawan POM. The Suppliers are freely to choose the mill choice of theirs. Except contract for payment rate, Quality of crop, and how payment has been made and it was found that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	Contract with FFB suppliers were drafted in the English language, which is understood by the suppliers, as verified during interviews.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	All contractor confirmed that payments were received within a reasonable timeframe which is 7-10 days after submission of invoice. And receipts contain specifying price, weight, deductions and amount paid are given.

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Clause	Indicators	Comply Yes/No	Findings
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	The mill and estate conducted the weighbridge calibration on annually basis base on applicable laws and regulations. Weighing Equipment in Derawan POM has been calibrated by yearly basis using accredited weighing company De Metrology 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 SOU Derawan 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. Sighted that latest Stakeholder meeting in Nov 2021 to promote on RSPO certification. However, currently the Growers and villagers were not in favor in the implementation due to high cost. Their only focus for MSPO first.
	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	There is a document namely "Flowchart and Procedures on Handling Land Disputes", Flowchart and Procedure on Handling Social Issues. The Dispute and Resolution Procedure commences with the receipt of complaint from any party, its investigation, proposed solutions and acceptance of the solutions or otherwise. If the proposed solution was rejected, the dispute will be brought for third party arbitration. Grievance or dissatisfaction and request for services on the part of the smallholder can be conveyed through the "Borang Aduan (Complaints Form)"- and the "Borang Permohonan (Request Form)". Sime Darby Whistleblowing Policy ensures anonymity. The Policy contains the Whistle Blower Complaint Response where the complainant has the option of remaining anonymous by not revealing his/her identity.
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 SOU Derawan 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. Sighted that latest Stakeholder meeting in Nov 2021 to consults with interested smallholders including women or other partners in their supply base to assess their needs for support to improve their livelihoods and to promote on RSPO certification. However, the Growers and villagers were not in favor in the implementation due to high cost. Their only focus for MSPO first.
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	YES	Sime Darby SOU Derawan 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. Sighted that latest Stakeholder meeting in Nov 2021 to consults with interested smallholders including women or other partners in their supply base to assess their needs for support to improve their livelihoods and to promote on RSPO certification. However, the Growers and villagers were not in favor in the implementation due to high cost. Their only focus for MSPO first.

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Clause	Indicators	Comply Yes/No	Findings
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	Sime Darby SOU Derawan 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. Sighted that latest Stakeholder meeting in Nov 2021 to consults with interested smallholders including women or other partners in their supply base to assess their needs for support to improve their livelihoods and to promote on RSPO certification. However, the Growers and villagers were not in favor in the implementation due to high cost. Their only focus for MSPO first.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	Sime Darby SOU Derawan 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. Sighted that latest Stakeholder meeting in Nov 2021 to consults with interested smallholders including women or other partners in their supply base to assess their needs for support to improve their livelihoods and to promote on RSPO certification. However, the Growers and villagers were not in favor in the implementation due to high cost. Their only focus for MSPO first.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	Currently Sime Darby SOU Derawan has created a system to trace their stakeholder around their estates. But so far smallholder and Growers in Sarawak doesn't want to involve because of financial restriction. But Sime Darby SOU Derawan do have a report and always publicly available in their website.

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	The equal opportunities policy is contained within the Sime Darby Social Policy dated January 2015, which states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Social Policy was displayed on notice boards in both Bahasa Malaysia and English. Besides that, 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: <ul style="list-style-type: none"> • Responsible Agriculture Charter (RAC) • Human Rights Charter (HRC)

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Clause	Indicators	Comply Yes/No	Findings
			<ul style="list-style-type: none"> 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 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. The policy shall be guided by the commitments spelt out in the Company's in Human Rights Charter (HRC) where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.</p>
	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	<p>Apart from the indicator 6.1.1 policy which states that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees. As confirmed by the workers during interviews and field observation, payment of wages/salaries, provision of housing and access to benefits and amenities is fair based on observation, review of pay checks, contracts of employment, including charging of recruitment fees for migrant workers.</p> <p>Sighted also evidence that Workers Agent agreement with Sime Darby Plantation dated 22 April 2019 the agreement has been listing detail regarding the fee charges to the workers which is Medical, Passport, Card, Transportation, Insurance, Visa, ISC, Flight Ticket and Shirts. Interviewed with Indonesia workers also they understand regarding these charges and they satisfied with them.</p> <p>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. Interviews conducted with workers (male, female, local and migrant) as well as local communities also confirmed that this is so. There is also no evidence of payment of recruitment fees by migrant workers</p>
	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	<p>Employment procedures for retirement and termination are available in the local workers' employment contracts. Similarly, foreign workers' contracts also contain provision for mutual termination. Retirement procedure is not applicable to foreign workers.</p> <p>Based on interviews with the estate and mill management including documentation review (interview assessment and medical report), recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness appropriate for the job. 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.</p>
	6.1.4 Pregnancy testing is not conducted	YES	<p>As of the date of the audit, it was confirmed by the worker during interview, there is no evidence that pregnancy testing was carried out in a discriminatory manner. Pregnancy test</p>

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Clause	Indicators	Comply Yes/No	Findings
	as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.		was done on the worker own free will. Based on the interview, if there any case of pregnancy, the female worker will be assigned to do light general work.
	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	<p>A gender committee is in place throughout all the production units within SOU Derawan 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. Sampled was a Gender Committee awareness briefing attended by all Gender Committee members of SOU Derawan held at each OU. Among the topics covered were:</p> <ul style="list-style-type: none"> - Rights of pregnant employees to be given alternative jobs, where appropriate, - No discrimination for getting pregnant; - Sprayers or workers who are breastfeeding will not be given jobs dealing with chemicals; - Medical consultation will be given by the estate Medical Assistant; - Domestic violence; - Sexual harassment; and - How to handle social issues, including how to lodge a complaint. - training on women's rights; - counselling for women affected by violence; - child care facilities to be provided by the growers and millers; - women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks; and - women to be given specific break times to enable effective breastfeeding. - Fact on breast cancer - Mammogram test; what is mammogram test.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	The equal opportunities policy is contained within the The policy of Group Sustainability and Quality Policy Statement, which states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Policy of Group Sustainability and Quality Policy Statement was displayed on notice boards in both Bahasa Malaysia and English. Interview with workers local female, migrant (India and Indonesia) and local male, they agreed that they have received equal pay for the work given. For example, sprayer gang has been paid by piece rate and the same gang also receive the piece rate pay. For harvester also they received the same rate for all harvesters in the estate. Any differences for the pay rate will be for tall palm and the short palm. For mill and estate general workers they receive daily payment as per Minimum

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Clause	Indicators	Comply Yes/No	Findings
			Wages Order Amendmend 2020.
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	Pay and conditions are documented and made available during the surveillance audit. These are contained in the workers' payslips and employment contracts. Pay slips were sighted and are provided to workers on a monthly basis as confirmed during interview with management. Pay slips for Mill and Estate field workers show breakdown for all work done such as allowances received, deductions, no. of days worked and for the Mill, any overtime hours performed. It was also verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages (Amendment) Order 2020 (from February 2020 onwards) and the Sarawak Labour Ordinance. Pay slips and employment contracts are prepared in English, Bahasa Malaysia and Bahasa Indonesia. They will also seek clarifications if they need further clarifications on their monthly pay slips.
	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	Derawan CU issues out contracts of employment to all its foreign employees, and letters of offer of employment to its Malaysian employees. a) The contracts detail out payments and conditions of employment (e.g. wages payable, working hours, deductions, overtime, sickness, insurance coverage, retirement age, holiday entitlement, maternity leave, reasons for dismissal, period of termination notice, mutual termination rights, etc). b) The employment contracts were prepared in Bahasa Malaysia which is the language understood by the Malaysian and Indonesia workforce. The contents of the contract were explained to them by the management representative. c) Both the workers and the management representative confirmed this during the interview. The workers' understanding was confirmed before they were asked to either sign or thumbprint on their respective employment contracts. d) The Company was not deducting from workers' pay except for statutory deduction i.e., SOCSO.
	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	There is evidence that workers observe regular working hours including overtime hours within the legal confines of the Sarawak Labour Ordinance. 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, Sarawak.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and	YES	Evidence is available that the Derawan CU 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. Each house has between

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Clause	Indicators	Comply Yes/No	Findings
	welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.		<p>2 to 3 rooms and accommodate between 2 to 5 workers. 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 football fields, badminton/takraw/volleyball court, children's playground, places of worship, sundry shops and an activity hall. There is evidence that housing inspection are being carried out once a week based on housing inspection records. Records of housing inspections was sighted and available. Water and electricity are also provided, and the bills are shared among occupants and deducted from their wages. Free medical treatment above is provided also to all workers and their dependents. The upkeep (sanitation) for all estates linesite visited were observed in good maintained. No water clogging at all. The estates in Derawan CU provided with treated water by water treatment plant and water sampling test was carried out 2 times annually for drinking water for human consumption.</p> <p>It is an opportunity for the management to embrace and drive digitalisation to its growing potential and responsibility. As short, if workers request to lodged a complaint on housing repairs, they just need to scan QR code which directive to put at the workers quarters surrounding and muster ground. There is evidence that housing inspection are being carried out once a week based on housing inspection records.</p> <p>Water and electricity are also provided, and the bills are shared among occupants and deducted from their wages. Free medical treatment above is provided also to all workers and their dependents. A Visiting Medical Officer (VMO) comes and visits the clinics once a fortnight to see patients and supervise the work of the Health Assistants.</p>
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	All units have its own canteen and grocery store which sells basic items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within its expiry period. Workers interviewed informed that they purchase items from these stores, but also since the estates and mill are easily accessible to the nearest town, they also go out to the towns. Workers could either pay in cash, or on credit.
	<p>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.</p> <p>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</p>	YES	All sampled workers receive at least minimum wages based on Minimum Wages Order (Amendmend 2020). Derawan, Takau, Sahua, Damai and Derawan Mill 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. The auditor had verified the calculation and though the calculation was in line with RSPO Guidance on Calculation Prevailing Wages.

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Clause	Indicators	Comply Yes/No	Findings
	<p>targets, and a phased implementation process will be in place, including the following:</p> <ul style="list-style-type: none"> • An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage 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	All the estates and mill employ full-time employees. Foreign workers are full-time employees but have a contractual duration which is stipulated in their employment contracts which is 2 years for Indonesians and 3 years for other nationalities. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department. All workers in SOU Derawan is a Permanent and full time workers and all the workers used for core work such as Harvesting, Manuring, Spraying, Milling Operation, Grading, Engine driver and workshop. There is no temporary workers use in the SOU Derawan.
6.3 The unit of certification respects	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national	YES	<p>Sime Darby Plantation Sdn Bhd subscribes to the documented policy on Social Policy.</p> <p>a) This Policy is available in dual language, i.e. Bahasa Malaysia and English and it recognizes and respects of employees to join trade union of their choice and to</p>

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Clause	Indicators	Comply Yes/No	Findings
the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.		bargain collectively subject to the provisions of relevant national legislations. b) The statement did mention in Point No 5 of the policy. Employment contracts sighted do not contain any prohibitive clause from joining any trade unions. c) The languages used in both Policies were English and Bahasa Malaysia. This was appropriate for workers as most were Malaysians and Indonesians whose main language was Bahasa Melayu.
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	YES	Records of meetings between SOU Derawan and workers representatives are available.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	YES	Based on interview held at all estates in the CU, the representatives for all workers were freely elected and management does not interfere, unless to facilitate the election.
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 policy on protection of children is contained in the Sime Darby Child Protection Policy. There was no evidence that the estates and the mill at SOU Derawan has employed 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	There was no evidence that the estates and the mill at SOU Derawan has employed anyone below the age of 18 years. Auditor also verified through the contractors in the SOU Derawan and confirmed there was no contractor workers available in the estate and mill. This was verified by examining the master lists, personal file, contracts and payslip of each operating unit where details of the workers' IC numbers and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed. At Derawan SOU the youngest workers are age 21.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	There was no evidence that the estates and the mill at SOU Derawan has employed anyone below the age of 18 years or young persons. Auditor also verify through the contractors in the SOU Derawan and confirmed there is no Contractor workers available in the estate and mill. This was verified by examining the master lists, personal file, contracts and payslip of each operating unit where details of the workers' IC numbers and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.

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Clause	Indicators	Comply Yes/No	Findings
	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	The policy protection of children is contained in the Sime Darby Child Protection Policy dated January 2015. There was no evidence that the estates and the mill at SOU Derawan employ anyone below the age of 18 years. Based on the documents sighted, communication about its no child labour Policy was communicated to all levels of employees as evidenced from training records to the workers were done during policy trainings.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	The policy to prevent sexual and other forms of violence is contained in the Sime Darby Social Policy. In addition, awareness on sexual and other forms of harassments are also briefed during muster and Gender Committee meetings held at each Mill and Estates. The Gender Committee Meetings are being held regularly where topics discussed include sexual harassment and violence. Members to lodge complaints if members encounter such incidence. Interviews with female employees confirmed their understanding of what constitutes sexual harassment. Training regarding Sexual Harassment Policy has been briefed to all workers and also during gender meeting.
	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 policy to protect reproductive rights of women is contained in the Sime Darby Plantation Gender Policy. Based on interviews conducted and documents reviewed, there is evidence that the Policy is being implemented. Workers interviewed, especially women employees from all levels of the workforce confirmed their understanding of the Policy.
	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	In the SOU Derawan Gender Committee have been established at the Mill and Estate levels to help disseminate awareness on issues relating to reproductive rights and need of new mothers. Awareness on reproductive rights need of new mothers are also briefed during muster and Gender Committee meetings held at each Mill and Estates. During this audit, there has been no evidence of any new mothers and therefore this indicator could not be verified. However, based on interview conducted with the Gender Committee members at Derawan POM, when she was pregnant, her needs were attended to which included a private room where she could express milk and a fridge for storage were made available. The estate has assessed their needs by interviewing them. The workers have no grievances and needs due to their child was not breastfeed anymore
	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. The procedures have been communicated to all levels of workforce. Training regarding grievance mechanism has been briefed to all workers.
6.6 No forms of forced or	6.6.1 (C) All workers have entered into employment voluntarily , and the following	YES	All workers in SOU Derawan in Estate and Mill have entered into employment voluntarily, it was verify during the interview with Indonesian workers. The workers know they will work in

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Clause	Indicators	Comply Yes/No	Findings
trafficked labour are used.	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 Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty to the workers for termination of employment Debt bondage Withholding of wages 		Oil Palm Sector since from their country. The mill and all visited estates had given passport to foreign workers as verified during interviewed with the workers. Workers also confirmed there is no involuntary overtime as they will work for overtime if management ask to, they also understand their contract which when they resign from Sime Darby which is prior to 8 weeks of notice, and they also don't have debt of bondage. Workers also understanding that they need to do as per the agreement to go to Malaysia, and the agent also already explained to them regarding the work they should get in Malaysia which is in oil palm plantation.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	The SOU Derawan adopts the Social Policy which states that "All employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work and representation race, caste, nationality". There is also a procedure entitled "Sourcing Process for Foreign Workers". Based on observations and interviews of foreign workers (harvesters, sprayers, mill workers), there is no evidence of contract substitution and no discriminatory practices against foreign workers. A post-arrival briefing is also given, in particular on the contents of their employment contracts, safety, benefits, etc.
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	YES	Estate / Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Manager subsequently assigned duties of ESH coordinator to the Assistants or healthcare assistant for the down line implementation of ESH practices in the estate and mill. All identified Executives were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. Occupational Safety Health (OSH) Committee has been established together. The OSH committee organization chart for 2020 was available. The Estate/Mill Manager is the chairman and the Mill Engineer/Assistant Manager is the secretary. OSH Committee meetings were held once in three months. OSH Committee meetings confirmed that among the agenda discussed, included the following: <ul style="list-style-type: none"> Passing of previous minutes and arising matters. Accident report (Monthly Data of Mill/Estate Safety Performance) Workplace inspection Safety report and programme

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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 (Bland/or BM) 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	Accident & Emergency Procedures guidelines were issued by SQM and amended to tailor to the situation differences in the estates and mills. ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training. The trained personnel for the First Aid were among the employees working in the mill on shift and the estates staff/mandores. Similarly, the estates distributed the first aid box to the mandores and brought along to the field during operations. In addition, there are also first aid boxes kept in the office, store and workshops. Accident procedures are available in national languages. Sighted latest procedure "Emergency Preparedness & Response Procedure. The objective of this procedure is to ensure effectiveness preparedness and necessary responses were available to deal with all potential emergency situation and accidents.
	6.7.3 (C) Workers use appropriate 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	Training and briefings on the operations were provided for workers to educate them on safe working practices to ensure applicable precautions are adhered. Training for employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, harvesters, pruners, field workers, 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. Based on the HIRARC carried out at the estates the PPE types for the various activities has been identified and implemented.
	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	SOU Derawan provides medical care to Group Estate workers with Klinik Ladang established within the premises. In addition, all workers are covered by SOCSO.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Procedure for reporting accident and near miss accident has established in procedure called "SOP of Incidents, Accidents & Non-Conformance. The objective of this procedure were: To provide clarity and guidance to ensure all incidents and nonconformance area reported, investigated, corrected, and prevented from recurring, and To ensure compliance with national, regional laws and other requirements. Occupational injuries are recorded using: OSH monthly performance report, Incident detailed report, LTI record, JKKP 6,7,8.

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

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

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	<p>Derawan CU continued to implement Integrated Pest Management (IPM) in all the estates. It continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Agricultural Reference Manual (ARM) Section 15 -Plant Protection. The IPM program among others;</p> <ul style="list-style-type: none"> a) includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. b) For bagworm control the program includes the planting of beneficial plants such as <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i> and <i>Turnera subulate</i> c) In order to minimize use of pesticides the estates had planted beneficial plants mainly <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> with maps indicating areas planted. d) Takau Estate in addition to <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> had well established <i>Euphorbia heterophylla</i>. <p>All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year. Baiting was continued until bait acceptance fell below 20%.</p>
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	This is not practiced in the estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM. The estates have declared this compliance in the status of IPM species invasiveness.
	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	As advocated, the estate practiced zero burning. In the replants visited during the audit in the estate, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estates. No fire was used for waste disposal.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	<p>The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs. Justification of the use of pesticides had been documented. The use of selective products that are specific to the targeted pest, weed or disease had been defined in</p> <ul style="list-style-type: none"> • Agriculture Reference Manual (ARM), • Estate Quality Management System (EQMS) Manual, • Sustainable Plantation Management System Manual (SPMS), • Plantations/Mill Quality Management System (PQMS/MQMS) std operating manual

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Clause	Indicators	Comply Yes/No	Findings																																										
			<p>The Manual had included a chemical register list which indicated the purpose of usage (intended target), hazards signage, trade and generic names. The Estate had maintained chemical registers and were updated periodically. The registers were updated on Mac/Aug 2021. The chemical used in the estate among others as listed below;</p> <table><tr><td></td><td>Chemical name</td><td>Class</td><td></td><td>Chemical name</td><td>Class</td></tr><tr><td>1</td><td>Glyphosate iso p/amine</td><td>III</td><td>7</td><td>Cypermethrin</td><td>III</td></tr><tr><td>2</td><td>Sodium chlorate</td><td>III</td><td>8</td><td>Tric butoxy ester</td><td>III</td></tr><tr><td>3</td><td>Glufosinate ammonium</td><td>III</td><td>9</td><td>Warfarin</td><td>III</td></tr><tr><td>4</td><td>Triclopyr butoxy</td><td>III</td><td>10</td><td>Indaziflam</td><td>III</td></tr><tr><td>5</td><td>Metsulfuron methy 20%</td><td>III</td><td>11</td><td>Bayfolan</td><td>III</td></tr><tr><td>6</td><td>Brodifacuum</td><td>IV</td><td>-</td><td>-</td><td>-</td></tr></table>		Chemical name	Class		Chemical name	Class	1	Glyphosate iso p/amine	III	7	Cypermethrin	III	2	Sodium chlorate	III	8	Tric butoxy ester	III	3	Glufosinate ammonium	III	9	Warfarin	III	4	Triclopyr butoxy	III	10	Indaziflam	III	5	Metsulfuron methy 20%	III	11	Bayfolan	III	6	Brodifacuum	IV	-	-	-
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	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	<p>The estates had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha.</p> <p>a) 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 and verified.</p> <p>b) All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II ,class III & class IV pesticides.</p> <p>c) No illegal agrochemicals (stated by local and international laws) in particular paraquat were used in their estates.</p>																																										
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	<p>The estates are committed to minimize the usage of agrochemicals by implementing IPM with the increased in the planting of beneficial plants such as <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i>. Blanket spraying is also not practiced by the estate and soft grasses were maintained in the field. It had also been the practice that insecticides and rat baits are used only after a threshold level has been exceeded as per the</p> <p>a) Agriculture Reference Manual (ARM),</p> <p>b) Estate Quality Management System (EQMS) Manual,</p> <p>c) Sustainable Plantation Management System Manual (SPMS),</p> <p>d) Plantations/Mill Quality Management System (PQMS/MQMS) std operating manual</p> <p>The chemicals used for the estate are as provided in the SOP, Manuals and where necessary as advised by the RGM/Agronomist during visits.</p>																																										
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	<p>There is no prophylactic use of pesticides. The quantity of agrochemicals required for various field conditions are documented and justified in SDP SOP for estates operations.</p> <p>a) SOU Derawan estates only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in</p>																																										

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Clause	Indicators	Comply Yes/No	Findings
			<p>accordance with USECHH Regulations 2000.</p> <p>b) From the review of the chemical register, it was noted that all pesticides used are of class III & class IV. The use of paraquat had been banned in all estates since 2007.</p>
	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	<p>The estates confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.</p> <p>a) The review of the chemical register concluded that all pesticides used were of class II, III & class IV. The use of paraquat had been prohibited in all SDP estates.</p> <p>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.</p> <p>c) Sighted from records and interviews with workers, staff and estate assistants, concluded that training was held with all precautions being taken and all legal requirements met.</p>
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	
	7.2.5b Why there is no other alternative which can be used.	YES	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES	
	7.2.5d What is the process to limit the negative impacts of the application.	YES	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying	YES	<p>Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the product.</p> <p>a) 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 handled in a safe method.</p> <p>b) The trade and generic names of the chemicals were made known to the workers through the SDS training. SDS was also displayed at all storage areas as observed during the audit.</p>

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Clause	Indicators	Comply Yes/No	Findings
	pesticides must show evidence of regular updates on the knowledge about the activity they carry out.		c) The training included the safety aspects and usage of PPE when handling with pesticides. All workers involved in pesticide application were provided with appropriate PPE and replaced when worn-out. PPE issuance & replacement records were verified by the auditors.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	The chemical stores in the estate were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). a) Records of purchase, storage and use were maintained. b) All store buildings were equipped with exhaust fans with the door secured. c) Only authorized personnel are assigned to handle the chemicals. d) All the chemicals were segregated in storage accordingly. Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Disposal are made together with the scheduled waste disposal under SW410.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	Empty pesticides containers were triple rinsed, holes punched and stored separately in the SW store. Thereafter disposal arrangement will follow accordingly as per procedure in Sustainability Manual procedure SD/SDP/PSQM (ESH)/203-EN1 – Scheduled Wastes (Hazardous Waste). Presently all SW are despatched to Trienekens (Sarawak) Sdn Bhd as the licensed buyer. No containers being used for other purpose in the estates with the exception that some empty chemical containers were recycled for premixing pesticides for onward delivery to field.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	YES	Aerial application of agrochemicals is not practiced in all SDP estates in the CU. This is confirmed through observation during the site visit, estate complex and interview with the employees. Such method is no longer in existence in the estate's practices.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	The CHRA for the estates was within the 5-year validity period. The details of the CHRA for all the units in Derawan CU as shown below. The recommendation from the CHRA is mainly on the training and medical surveillance for operators working in WTP, rat baiting workshop, scheduled waste and chemical store. The CHRA report among others described requirement of medical surveillance to be made for the listed category of employees.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or	YES	The estates in the CU complied with procedure and guidelines provided in the Polisi Pengendalian Racun Perosak Bertoksik Tinggi signed by the CEO whereby no work with pesticides is given to pregnant or breast-feeding women. Tidak dibenarkan pekerja wanita

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	other people that have medical restrictions and they are offered alternative equivalent work.		yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan). The estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.												
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	Derawan CU, sighted Waste and Pollution – Identification, Prevention, Mitigation and Improvement Plan that applicable for all estates. The estates have identified and documented type of waste that generated from its operation in a Waste Management Plan 2021. The waste management plan has also identified source of pollution, possible waste/pollution, effected environment, prevention, mitigation and enhancement. The organization had maintained waste management plan for year 2021. The details as per table below:												
			<table><tr><th>Type of waste</th><th>Location</th><th>Action</th></tr><tr><td>Scheduled waste such Spent Lubricants,Spent hydraulic,used filters,spent chemicals,empty pesticides container, clinical waste and etc.</td><td>Workshop,Engine room,Chemical mixing area,Clinic</td><td>As stipulated in SOP handling of Scheduled waste, SOP of triple rinsing & SOP on disposing Empty pesticides Container.</td></tr><tr><td>Domestic waste such as rubbish and sewage.</td><td>Line site,office,mill plant</td><td>Allocate landfill away from waterways, recycle programmes and awareness to employees.</td></tr><tr><td>Industrial waste such as POME,EFB,Boiler ash,Decanter cake, scrap metal.</td><td>ETP, EFB station,Boiler station,workshop.</td><td>Monitoring of POME & sell to third party</td></tr></table>	Type of waste	Location	Action	Scheduled waste such Spent Lubricants,Spent hydraulic,used filters,spent chemicals,empty pesticides container, clinical waste and etc.	Workshop,Engine room,Chemical mixing area,Clinic	As stipulated in SOP handling of Scheduled waste, SOP of triple rinsing & SOP on disposing Empty pesticides Container.	Domestic waste such as rubbish and sewage.	Line site,office,mill plant	Allocate landfill away from waterways, recycle programmes and awareness to employees.	Industrial waste such as POME,EFB,Boiler ash,Decanter cake, scrap metal.	ETP, EFB station,Boiler station,workshop.	Monitoring of POME & sell to third party
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7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	The procedure PSQM Operational Control Procedure–Scheduled Wastes (Hazardous Waste) Management has been established and implemented accordingly.													
7.3.3 The unit of certification does not use open fire for waste disposal.	YES	Derawan certification unit had dispose waste disposal in the landfill and sighted no sign used of fire for waste disposal spotted during site visit.													
7.4 Practices maintain soil fertility at, or where improve soil	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	All 4 estates in Derawan CU practiced the maintenance of long-term soil fertility by annual application of fertilisers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and some EFB and compost application. Maintaining soil fertility was guided by the following: i) OPAP Chapter 5 – Establishment and Maintenance of Legume Covers												

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Clause	Indicators	Comply Yes/No	Findings
fertility to, a level that ensures optimal and sustained yield.			<ul style="list-style-type: none"> ii) OPAP Chapter 11 – Manuring iii) OPAP Chapter 12 – EFB Application iv) EOMS chapter B8 – Leguminous Cover Crops v) EOMS chapter B14– Manuring vi) ARM Section 8, Etc. <ul style="list-style-type: none"> a) Fertilizer application, which was of paramount importance for maintenance of soil fertility, were carried out based on the recommendation made by the agronomist from Sime Darby Research Sdn. Bhd. Annual fertilizer recommendations were made based on annual foliar sampling while soil sampling was carried out on a 5-year cycle basis 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. Noted from the records that the actual amount of fertilisers applied in 2019 were completed.
	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 the estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. For all the estates Agronomic assessment and fertiliser recommendation was conducted by Sime Darby Research Plant Nutrition & Protection Unit Sarawak Region to formulate the 2021 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been carried out in all estates. All foliar and soil sampling & analysis was conducted by Sime Darby Research Plant Nutrition & Protection Unit. Soil analysis is made on a 5-year cycle.
	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	All Estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of Solid POME. In addition, during replanting, palms were felled, chipped, windrowed and left to decompose.
	7.4.4 Records of fertiliser inputs are maintained.	YES	Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc. Review of the records revealed that the actual fertilizers applied in 2020/21 was in line with the program. The following fertilizers were applied in SOU 33 estates subject to the recommendation by the Agronomist.
7.5 Practices minimise and control erosion and degradation of	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available.

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for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	terrain, are taken into account in plans and operations.		
	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	As mentioned in 7.6.1 of this checklist and based on audit findings, there is no new planting in SOU Derawan. Hence the requirement for the availability of maps identifying marginal and fragile soils does not apply.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	Soil surveys are done and available in a soil map at all estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	YES	As mentioned in 7.6.1 of this checklist and based on audit findings, there is no new planting in SOU Derawan. Hence the requirement for the availability of maps identifying marginal and fragile soils does not apply.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	YES	As mentioned in 7.6.1 of this checklist and based on audit findings, there is no new planting in SOU Derawan. Hence the requirement for the availability of maps identifying marginal and fragile soils does not apply.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	Peat soil is available in Takau Estate. Subsidence of peat soil at this area is being monitored. Equipment/Tools are prepared as per the ARM. The monitoring of peat soil subsidence was guided by the following; a) Item 2 – Optimal Water Levels for Coastal/Peat Soil and b) Item 4 – Water-table monitoring of Chapter 10 of Sime Darby Agricultural Reference Manual – Water Management in Coastal and Peat Plantings. c) Guidance in the “Peat Subsidence Gauge Installation SOP” dated 14/03/2016. The estates monitored water levels using water level markers in drains and water tubes for ground water levels. Records relating to peat management as sampled verified for Takau Estate are as follows; a) Map showing location of peat subsidence pole PSP & Piezometer b) Peat Subsidence Monitoring

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Clause	Indicators	Comply Yes/No	Findings
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	<p>The water and ground cover management programme is documented in the Sime Darby Agricultural Reference Manual (Water Management in Coastal and Peat lands). Details are described in 7.8.1. individual estates and mill had their respective water management plan mainly to monitor among others the following;</p> <ul style="list-style-type: none"> a) Monitor the quality of main water inlet/outlet for pollutants from estate's operations. b) Contingency during water shortage. c) Field water management - side pit construction d) Adequate field drains e) Reuse/recycle wastewater f) Peat soil water management
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.	YES	<p>Records showed that a Pilot Trial on "Peat Drainability Assessment for Sarawak" had been conducted between May 2017 to May 2018 and report was published in October 2018. The assessment covered Belian, Lavang Special, Lavang, Rasan, Dulang, Pekaka and Ruai Estates of SOU 31 & 34 which was of about 4,500Ha. The entire area had been classified into 3 Basins.</p> <ul style="list-style-type: none"> a) Basin 1: Pekaka Estate and Dulang Estate which was drained by Sg. Belenge. b) Basin 2: All of Dulang Estate which was drained by Sg. Paroh. c) Basin 3: Belian, Lavang Special, Lavang, Rasan and Ruai Estates which was drained by Sg. Labang. <p>Based on the above classification, on SOU 31 & 34, Basin 1 & Basin 2 are classified as Class 1, while basin 3 is classified ranging between Class 1 and Class2. Based on this report all peat areas in SOU 31 & SOU 34 can be replanted. During this audit there was another trail/survey was made by STROPI State Government Of Sarawak on 17/11/21 for Lavang, Rasan and Belian Estates. Report and outcome have yet to be produced at time of visit.</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',	YES	<p>There were no other fragile soils other than peat soils as mentioned under indicator 4.3.1. The management strategy in place for peat soil was guided by;</p> <ul style="list-style-type: none"> a) Item 2 – Optimal Water Levels for Coastal/Peat Soil and b) Item 4 – Water-table monitoring of Chapter 10 of Sime Darby Agricultural Reference Manual – Water Management in Coastal and Peat Plantings.

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	version 2 (2018) and associated audit guidance.		c) Guidance in the "Peat Subsidence Gauge Installation SOP". The estates monitored water levels using water level markers in drains and water tubes for ground water levels.
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.	YES	SDP is committed towards no deforestation and new development on peat as described in Responsible Agriculture Charter - revised 2020. In this CU, peat series available in Takau Estate only.
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	YES	Mill /estates had established its Water Management Plan 2021 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as; a) Implementation of rain water harvest, b) Construction of water gate and scheduled water pumping for effective management of field drains and field water level. c) daily monitoring of bund / scheduled maintenance d) Establishment of <i>mucuna bracteata</i> to prevent erosion, e) Side drain at field road to control water, frond stacking, f) Enhancement of ground vegetation at bare ground area.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	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 <ul style="list-style-type: none"> Analysis of river quality was carried out on monthly basis by internal accredited laboratory from Sime Darby Research Sdn Bhd – Chemical Laboratory and external accredited laboratory ESI Laboratory Sdn Bhd. Results were submitted to DOE through the quarterly report. Results indicated in compliance to the regulatory limit Estate Monitoring of river water quality been conducted by operating units. Specific for estates, river water monitoring thru Environmental Monitoring report which submitted quarterly to Natural Resource and Environment board by ESI sampling Sdn Bhd.

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	7.8.1b Workers have adequate access to clean water.	YES	Microbiology water analysis has been carried out by monthly basis. Sighted latest analysis has been carried. Results from the assessment were indicated no E.Coli & total coliform was absent in the water samples.												
	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	Sighted during site visit, all estates had managed to maintain their riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).												
	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	License renewed. According to DOE's license, the disposal method of the final discharge is through water course. The ETP was regularly maintained by desludging of the ponds to ensure its efficiency. Final discharge samples were taken on monthly basis and sent to an accredited laboratory for analysis. Among the parameters required by the DOE to be monitored are bio-oxygen demand (BOD), suspended solid (SS), oil and grease (O&G), ammoniacal nitrogen (AN) total nitrogen (TN), pH and temperature. The results of analysis were submitted to the DOE on quarterly basis. All parameters were within the regulatory limit such as BOD discharged to land irrigation was not more than 20 mg/l. Lab Report for final discharge were carried out by accredited laboratories on monthly basis. The result was within the limit. The last test was carried out on 17/07/2020.												
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Remote Process water is obtained from water catchment near to the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis.												
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>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report.</p> <table border="1"> <thead> <tr> <th>No.</th><th>Target</th><th>Objective</th><th>Action plan</th></tr> </thead> <tbody> <tr> <td>1</td><td>Backhoe, tractor</td><td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td><td>to ensure the vehicle engine is turn off during idle time to record vehicle activity which consume fuel</td></tr> <tr> <td>2</td><td>Van / Supervisory vehicle</td><td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td><td>to record vehicle activity in order to eliminate waste activity which consume fuel. to turn off vehicle engine during idle time.</td></tr> </tbody> </table>	No.	Target	Objective	Action plan	1	Backhoe, tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	to ensure the vehicle engine is turn off during idle time to record vehicle activity which consume fuel	2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	to record vehicle activity in order to eliminate waste activity which consume fuel. to turn off vehicle engine during idle time.
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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>The CU had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. Sighted report sends via email to RSPO on 14/10/2020. Derawan SOU had identified significant pollutants and greenhouse gas (GHG) emissions and continued to maintain its documented plans to mitigate environmental pollution associates to its activities. The environmental aspects for air pollution were identified. The action plan and continuous improvement plan named Action Plan to reduce GHG was established. Example of the action plan that had been plan is to monitor diesel usage.</p> <p>The GHG emission was included in the CU's Environmental Aspect Impact. All estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation. The management from all estates had plan to reduce emission by daily inspection and monitoring for their farm tractor and gen set.</p> <table><tr><th>Description</th><th>tCO₂e/tProduct</th></tr><tr><td>CPO</td><td>1.83</td></tr><tr><td>PK</td><td>1.83</td></tr></table> <table><tr><th>Land Use</th><th>Ha</th></tr><tr><td>OP Planted Area on mineral</td><td>15876.20</td></tr><tr><td>OP Planted on Peat</td><td>13.55</td></tr><tr><td>Conservation (forested)</td><td>0.00</td></tr><tr><td>Conservation (non-forested)</td><td>0.00</td></tr><tr><td>Total</td><td>15889.75</td></tr></table> <p>Mill Emission</p> <table><tr><th colspan="3">Own Crop</th></tr><tr><th>Emission source</th><th>tCO₂e</th><th>tCO₂e/tFFB</th></tr><tr><td>POME</td><td>23326.72</td><td>0.20</td></tr><tr><td>Fuel consumption</td><td>64.07</td><td>0.00</td></tr><tr><td>Grid electricity utilisation</td><td>0</td><td>0</td></tr><tr><td>Credits</td><td></td><td></td></tr><tr><td>Export of excess electricity to housing & grid</td><td>0</td><td>0</td></tr><tr><td>Sale of PKS</td><td>0</td><td>0</td></tr><tr><td>Sale of EFB</td><td>0</td><td>0</td></tr></table>	Description	tCO ₂ e/tProduct	CPO	1.83	PK	1.83	Land Use	Ha	OP Planted Area on mineral	15876.20	OP Planted on Peat	13.55	Conservation (forested)	0.00	Conservation (non-forested)	0.00	Total	15889.75	Own Crop			Emission source	tCO ₂ e	tCO ₂ e/tFFB	POME	23326.72	0.20	Fuel consumption	64.07	0.00	Grid electricity utilisation	0	0	Credits			Export of excess electricity to housing & grid	0	0	Sale of PKS	0	0	Sale of EFB	0	0
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	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	YES	Auditor has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Derawan CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.																																																			
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	<p>The Environmental Impact and Aspect Assessment and Pollution Prevention Plan was used to identify the GHG emissions. Some of the Greenhouse Gas emissions are through Land Conversation, Crop Sequestration, Fertiliser, N₂O from fertiliser, Fuel Consumption, Peat Oxidation. Plans to reduce or minimise them are in place. Derawan CU also plan to reduce GHG by construct Biogas plant to capture Methane gas generated from the Effluent Treatment Plant to generate bio gas engine to produce electricity for mill and domestic use. For estate identified significant pollutants been addressed by the management. Sighted the progress of mitigating measures been monitored as per table below:</p> <table><tr><th>Environmental Issue</th><th>Mitigating Measures</th><th>Status</th></tr><tr><td>Oil/pesticide leakage discharge to the land</td><td>Used of secondary tray and oil trap</td><td>On going</td></tr><tr><td>Contamination of natural watercourse</td><td>Signages of restriction of spraying activities at buffer zone Continuous training & awareness</td><td>On going</td></tr></table>	Environmental Issue	Mitigating Measures	Status	Oil/pesticide leakage discharge to the land	Used of secondary tray and oil trap	On going	Contamination of natural watercourse	Signages of restriction of spraying activities at buffer zone Continuous training & awareness	On going																																										
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			Air pollution from vehicle	Frequently maintenance on the vehicle used for complete combustion	On going
			Scheduled waste	Sending it to authorize collector for disposal	On going
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	As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for the OP cultivation.		
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	The organization had established Emergency preparedness and response Procedures, with extend company zero burning policy to neighbors in areas within 5km radius from estate boundaries. Emergency maintenance of firefighting equipment been conducted by Regional SQM and been close monitor the rectification process by operating unit.		
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	Engagement with stakeholders for SOU 33 had been conducted on 4 th November 2021 and minutes shown agenda on fire prevention and control measures been discussed.		
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	YES	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Derawan CU since Nov 2005.		
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	SOU Derawan has reviewed their HCV with new assessment conducted on June 2017. The new HCV assessment titled 'HCV Assessment For Sarawak Zone. which included both the planted area and relevant wider landscape-level considerations with villages and forest reserved. Based on the HCV assessment report, the total area of HCV area for SOU Derawan is 333.70ha HCV area.		
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	YES			
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15	YES			

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Clause	Indicators	Comply Yes/No	Findings
	November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.		
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).	YES	The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan dated in Dec 2021.
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	YES	Based on HCV report titled 'HCV Assessment For Sarawak Zone. and interviews with stakeholders nearby, it can be concluded that there were no rights of local communities have been identified in HCV areas.
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly	YES	Although there was no RTE species found in the CU, Sime Darby SOU Derawan still established their own disciplinary measures if any of their staff or workers found to capture, harm, collect or kill the RTE species. If found any activities to capture, harm, collect or kill RTE species, the estates will make a report to the Sarawak Wildlife Department

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	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.		immediately.
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	YES	An action plan for FY 2021 was made available at the Takau, Derawan, Sahu and Damai. The outcomes of monitoring were included in the HCV report. An action plan for FY 2021 was made available at the Takau, Derawan, Sahu and Damai Estate. Noted the CU had continued to implement planned actions such as awareness to the staffs and public on enhancing biodiversity, posting of relevant information in the Sime Darby webpage and erection of signage at strategically locations
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) Applies.	YES	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Derawan CU since Nov 2005. Remediation and Compensation Procedure (RaCP) did not apply.

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:	<u>To include details on Orang Asli</u> 1.To report the name of their kampung and placement (penempatan). No. of the residents of Orang Asli. 2.Where they are located (radius within 5km from the CU). Check the estate map and estate boundary on neighboring Orang Asli villages. 3.Verify the stakeholders list on neighboring Orang Asli community with the CU. 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		NA

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	<p><i>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 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><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>		NA

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	<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><u>What CU needs to do to address the issues</u></p> <p>1.FPIC with the affected Orang Asli communities on the estate operation.</p> <p>2.Annual external stakeholder consultation with Orang Asli representative.</p> <p>3.Stakeholder consultation with the community had been conducted during initial SIA assessment.</p> <p>4.Review social action plan with participatory of affected Orang Asli.</p> <p>5.Brief and circulate grievances/ disputes mechanism/procedure.</p> <p>6.To offer job opportunity to Orang Asli – male & female.</p> <p>7.Protection of Orang Asli sacred area or grave.</p> <p>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.</p>		NA

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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>	<p>(a) As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.</p>	YES	<p>SDPB is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.</p> <p><u>Indonesia</u></p> <p>PT Bahari Gembira Ria</p> <p>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</p> <p>Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing.</p> <p>As at June 2017, the smallholders with the total of 29,914 Ha (58% from the total Ha, 51,715 Ha) of associated smallholders in Indonesia has been certified. Certification process for the remaining associated smallholder's areas was on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and out growers by end 2020.</p> <p>PT Bersama Sejahtera Sakti</p> <p>The new project at KKPA Maju Bersama by the plasma community is currently in nursery stage and not yet due for harvesting, the year of planting was in 2014.</p> <p>PT Ladang Rumpun Subu Rubadi</p> <p>SAP 1 Estate PLASMA will be undergone 2nd stage audit on 2019.</p> <p>PT Guthrie Pecconina PT Bina Sains Cemerlang, PT Sime Indo Agro</p> <p>Land legalization still in progress.</p> <p>PT Bina Sains Cemerlang, PT Sime Indo Agro</p> <p>Issue in getting Surat Perijinan, still in progress.</p> <p><u>Papua New Guinea (NBPOL)</u></p> <p>Markham Farming Company Limited (MFCL) / Markham Agro Pte. Ltd.</p> <p>Estimate to be certified on year 2020.</p> <p>The majority of Markham Farms has already been planted by the former owner</p>

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				without following RSPO NPP. Therefore, the Remediation and Compensation Procedure will be required to be full filled in order to achieve certification. The Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEIA and LUCA are being undertaken in order to submit and mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration. https://rspo.org/certification/remediation-and-compensation/racp-tracker no 82
	(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	It can be confirmed that there were several changes to the current time bound plan as verified during this audit. 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 .
	(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 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
	(d)	Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.	YES	
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. Any new	YES	Based on internal and external audit (ISPO certified) there was no replacement of primary forest or HCV areas in the uncertified management unit. Except for NBPOL area which have potential liabilities of RSPO grower members and the stages of the Remediation and Compensation Procedures (RaCP) that the

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		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;		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
	(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)	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,	YES	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: Land legalization – PT Guthrie Pecconina, PT Bina Sains Cemerlang, PT Sime Indo Agro (INA) Surat perijinan in progress (Jadual Pematuhan) – PT Sandika Natapalma/PT

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		with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		<p>Budidaya Agro Lestari (INA)</p> <p>NPP – Markham Farming & Markham Agro (NBPOL)</p> <p>Sold off – PT Mitral Austral Sejahtera (INA), Sime Darby Plantation Grand Cape Mount (Liberia).</p>
		<ul style="list-style-type: none"> A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; 	YES	
		<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 	YES	
		<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 	YES	
		<ul style="list-style-type: none"> If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. 	YES	
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.	YES	
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.	YES	

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<p>5.6.6</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>	<p>No additional indicators</p>	<p>YES</p>	<p>As it has been mentioned in 4.4.1 of this checklists, the Land Title for All Estate has been verified, for all estates. The Land Title was under the name of Sime Darby Plantation Bhd. Each estate had legal use of the land through Lands and Surveys Department following the payment of premium and Land fee. Based on this, it has been confirmed that there was no such case concerning the rights of local communities or indigenous people in the SOU.</p>
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ATTACHMENT 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors												
MZK 01 2021 3.8.7	Major	<p>Requirement : 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> <p>Finding : There is a projected overproduction of certified tonnage for CPO and PK at Derawan POM</p> <p>Objective evidence : Sighted evidence there is overproduction of certified tonnage for CPO PK and Derawan POM has yet to inform the CB. The figure as below:</p> <table><tr><td></td><td>FFB</td><td>CPO</td><td>PK</td></tr><tr><td>Projected</td><td>140,728.89</td><td>29,159.03 mt</td><td>6,811.28 mt</td></tr><tr><td>Actual</td><td>142,642.74</td><td>30,443.114 mt</td><td>7,230.62 mt</td></tr></table>		FFB	CPO	PK	Projected	140,728.89	29,159.03 mt	6,811.28 mt	Actual	142,642.74	30,443.114 mt	7,230.62 mt	<p>Root cause: The overproduction of certified FFB is due to certified volume was based on the amount declared in 2019 audit plus 2 times extension up to September 2021, assuming audit will be done in October 2021 when in actual, audit was only conducted in December 2021 due to pandemic COVID19 and restriction movement imposed by the government. The budget OER for estimated CSPO/CSPK calculation was also low resulting to low total estimated volume for CSPO/CSPK.</p> <p>The extension of time has been done by Head Office (Group Sustainability Department) team and approved by SIRIM/RSPO Secretariat however no extension of FFB production.</p> <p>Correction: To inform and request the approval of the FFB tonnage production extension to Certified Body.</p> <p>Corrective Action: The monitoring of the certified FFB production in line with the projected/budgeted approval on monthly basis. Regional Office (Mill Coordinator) & Head Office to trigger the mill after production achieved 70% of the projection and yet to reach the final quarter of the Certification Surveillance Year or if there are a need to extend the certification</p>	<p>The extension of CPO & PK at Palm Trace has been approved by the RSPO on 22/12/2021. Auditor also verified the appointment letter of PIC Muhammad Amirul Adli bin Ab Razak (Assistant Mill) dated 1/1/2022 who is appointed as the Mill Coordinator and shall be the one responsible in monitoring the certified FFB production, at the same time, CPO & PK production should there be any volume extension needed.</p> <p>Status: CLOSED</p>
	FFB	CPO	PK													
Projected	140,728.89	29,159.03 mt	6,811.28 mt													
Actual	142,642.74	30,443.114 mt	7,230.62 mt													

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			license time. Half year review of certification period will be done by Regional Person In charge in ensuring the mill do not reach the production limit.	
MAR 01 2021 3.3.2	Minor	<p>Requirement :A mechanism to check consistent implementation of procedures is in place.</p> <p>Finding : A mechanism to check consistent implementation of procedures i.e</p> <ul style="list-style-type: none"> - Monitoring on pregnancy female employees at Derawan and Takau Estate. - Monitoring on employee attendance especially female employees who is give childbirth <p>Objective evidence :</p> <ul style="list-style-type: none"> - Interview held with Medical Assistant and verification of records at Takau Estate clinic, no evidence of records on female employees who is currently pregnancy. - Based on checkroll records and daily input on 2 female employees, who is just give childbirth on Sep 2021 and Dec 2021, daily outturn (on Sep, Oct and Nov) was key in as working, but in actual facts they were not working due to maternity leave. 	<p>Root cause:</p> <ol style="list-style-type: none"> 1) wrong interpretation from Female employees at Derawan and Takau Estate which is they think they do not have to check up if they are pregnant . and also mistakes by Assistant until staff because of not verify and identify their own workers. 2) This issue is due to wrongdoing by Staff and not detected earlier by the Assistant Manager due to Staff and Mandore hiding their agenda. <p>Corrective Action:</p> <ol style="list-style-type: none"> 1) To initiate Domestic Inquiry to related personnel 2) To escalate matter to Group HR 3) To increase frequency of detailed verification by Executives to inputs established by staff 4) To provide clear communication and guidelines for maternity benefits for foreign female employees. Female workers on maternity leave shall be coded as M2 in the system. 5) Establishment of Children Welfare Committee at regional level to monitor monthly updates on pregnant female workers. The committee will ensure that all necessary requirements are in place. 6) Refresher training to MAs and on-site verification to clinics' documentation to ensure maternal and child immunization are recorded. 	<p>Corrective action Plan Accepted. The Corrective Action will further verify During next Assessment</p> <p>Status: Open</p>
DA 01 2021 2.2.2	Minor	Requirement: All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal	<p>Root cause:</p> <p>The verification of legal compliance by the</p>	Corrective action Plan Accepted. The Corrective Action will further verify

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		<p>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.</p> <p>Finding: FFB Transportation contractor did not meet the applicable legal requirements and cannot be demonstrated by the third party.</p> <p>Objective evidence: KSG Enterprise Sdn. Bhd. (FFB Transportation) did not complied to Labour Ordinance Sarawak Act A1237 (Amended as at 10/02/2005), Section 105D, 105E. During interview with contractor workers (FFB Lorry Driver), there was no evidences for the workers have been paid as per regulation i.e. Annual Leave Entitlement Pay and Paid Sick Leave. In the meantime, based on verification of pay slips (Sep. 2021 to Nov. 2021), sighted the payment of wages was paid after 7th of the following month which not complied with for Section 109.</p>	<p>contractors have been done but yet to cover compliance on SLO due to COVID 19. No checklist/guideline has been develop to check on the legality of salary payment to contractors' workers.</p> <p>.</p> <p>Corrective Action: 1) To inform contractors on the requirement to pay salary to their workers as per the SLO and ensure payment made accordingly starting January 2021. 2) To conduct monthly KPI monitoring to contractors as per the C&V SOP. 3) To develop checklist for KPI monitoring.</p>	<p>During next Assessment</p> <p>Status: Open</p>
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ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor																																
4.7.3 STK 01	Major	Objective evidence: Derawan Estate: At time of visit it was observed that workers carrying out harvesting in Field P14C and workers applying fertiliser in Field P14A were not wearing the appropriate PPE.	<p>Briefings at muster ground and trainings on the importance of PPE. Training in 2020 will be carried out.</p> <ol style="list-style-type: none">1. PPE Training to Manuring Gang2. Issuance of appropriate PPE for the operators3. Daily PPE inspection by the mandore and close monitoring by the in-charge staff and executive4. PPE inspection checklist/logbook to trace misconduct frequency by the workers for appropriate action <p>Records of training on PPE attended by 18 employees on 15/11/2019 and training program for 2020 (9/03, 15/06, 21/09 & 28/12) received.</p> <p>Will verify during onsite audit.</p>	<p>Derawan Estate, at time of visit it was observed that workers carrying out harvesting in Field P14C and workers applying fertiliser in Field P14A were not wearing the appropriate PPE.</p> <p>The PPE compliance was observed by the workers and staff during the field visits as detailed below;</p> <table><tr><td></td><td>Date</td><td>Estate</td><td>Operations/Activities</td></tr><tr><td>1</td><td>13/12/21</td><td>Damai</td><td>P16C - Harvesting / LF collection</td></tr><tr><td>2</td><td>13/12/21</td><td>Damai</td><td>Nursery</td></tr><tr><td>3</td><td>14/12/21</td><td>Sahua</td><td>P94SK - Spraying / P98 SK Harvesting/LF collection</td></tr><tr><td>4</td><td>14/12/21</td><td>Sahua</td><td>P00SA - Circle spraying</td></tr><tr><td>5</td><td>15/12/21</td><td>Derawan</td><td>P2020C - Weeding / P94 - Harvesting</td></tr><tr><td>6</td><td>15/12/21</td><td>Derawan</td><td>P15 S - Harvesting / Nursery</td></tr><tr><td>7</td><td>16/12/21</td><td>Takau</td><td>P13A - LF collection / P95TH - Harvesting</td></tr></table> <p>As such the previous Major NCR STK 01 2019 in 2019 raised is closed and concluded.</p> <p>Status: Closed</p>		Date	Estate	Operations/Activities	1	13/12/21	Damai	P16C - Harvesting / LF collection	2	13/12/21	Damai	Nursery	3	14/12/21	Sahua	P94SK - Spraying / P98 SK Harvesting/LF collection	4	14/12/21	Sahua	P00SA - Circle spraying	5	15/12/21	Derawan	P2020C - Weeding / P94 - Harvesting	6	15/12/21	Derawan	P15 S - Harvesting / Nursery	7	16/12/21	Takau	P13A - LF collection / P95TH - Harvesting
	Date	Estate	Operations/Activities																																	
1	13/12/21	Damai	P16C - Harvesting / LF collection																																	
2	13/12/21	Damai	Nursery																																	
3	14/12/21	Sahua	P94SK - Spraying / P98 SK Harvesting/LF collection																																	
4	14/12/21	Sahua	P00SA - Circle spraying																																	
5	15/12/21	Derawan	P2020C - Weeding / P94 - Harvesting																																	
6	15/12/21	Derawan	P15 S - Harvesting / Nursery																																	
7	16/12/21	Takau	P13A - LF collection / P95TH - Harvesting																																	

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<p>4.7.5 STK 02</p>	<p>Major (Recurrent Minor)</p>	<p>Objective evidence: At time of visit it was observed that First Aid Boxes were not available at:</p> <ul style="list-style-type: none"> a) Derawan Estate: at the harvesting worksites in Fields P15B & P14C and at the manuring worksite in Field 14A. b) Damai Estate: at EFB application worksite in Field 2017C. 	<ul style="list-style-type: none"> ▪ Warning letter to the mandore ▪ First aid refresher training to first aiders and emphasis on bringing the kit at all times at work. ▪ Ground check by the executive <p>Final warning letter to mandora sighted. Evidence of ground check for First Aid boxes for November 2019 & until 16 December 2019 sighted. Photographs on training of Daily inspection of First aid boxes sighted.</p> <p>Will verify during onsite audit.</p>	<p>The trained personnel for the First Aid were among the employees working in the mill on shift and the estates staff/mandores. The first aid boxes were available at various points in the mill complex including laboratory, office, workshop, process control room etc. Similarly, the estates distributed the first aid box to the mandores and brought along to the field during operations. In addition, there are also first aid boxes kept in the office, store and workshops. During Site visit it was found that First Aid box are available at field at all sites visited at Sahua, Takau, Damai and Rajawali Thus, Past Major NCR STK 02 2019 has successfully closed.</p> <p>Status: Closed</p>
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ATTACHMENT 6 – Timebound Plan

Time Bound Plan of Sime Darby Plantation Berhad

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

SOU NO	Name of SOU	Location	Date of Certification	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '10	
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	
3	Elphil	Sg Siput, Perak	18 Jun '11	
4	Flemington	Teluk Intan, Perak	5 Oct '11	
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	
5	Selaba	Teluk Intan, Perak	3 Mar '11	
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	
8	East	Carey Island, Selangor	19 May '10	
9	West	Carey Island, Selangor	19 May '10	
10	Bukit Puteri	Raub, Pahang	7 Jul '11	
11	Kerdau	Temerloh, Pahang	7 Jul '11	Jentar Estate has merged with Kerdau Estate and reported to the CB in March/April 2021.
12	Jabor	Kuantan, Pahang	7 Jul '11	
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	New Labu Estate has become a division of Labu Estate.
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	
15	Sua Betong	Port Dickson, Negeri Sembilan	18 Feb '14	Siliau Estate has now been merged into Salak Estate and Bradwall Estate.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '11	Sg. Gemas Estate has now been merged into Sg Senarut Estate.
17	Kempas	Jasin, Melaka	20 May '15	Serkam Estate, previously from SOU18(Diamond Jubilee) is now part of SOU 17(Kempas)
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	Serkam Estate, previously from SOU18(Diamond Jubilee) is now part of SOU 17(Kempas). Welch Estate, previously from SOU 19(Pagoh) is now part of SOU 18(Diamond Jubilee).
19	Pagoh	Muar, Johor	28 Jan '14	
20	Chaah	Chaah, Johor	18 Nov '10	
21	Gunung Mas	Kluang, Johor	19 May '10	SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bk Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018.
22	Bukit Benut	Kluang, Johor	5 Oct '11	SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is

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				merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2018.
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	
24	Hadapan	Layang-layang, Johor	29 Mar '11	
25	Sandakan Bay	Sandakan, Sabah	1 Oct '08	
26	Melalap	Tenom, Sabah	21 Jan '11	
27	Binuang	Kunak, Sabah	16 Jan '09	
28	Giram	Kunak Sabah	16 Jan '09	
29	Merotai	Tawau, Sabah	16 Jan '09	
30	Lavang	Bintulu, Sarawak	30 Dec '11	
31	Rajawali	Bintulu, Sarawak	30 Dec '11	
32	Derawan	Bintulu, Sarawak	30 Dec '11	
33	Pekaka	Bintulu, Sarawak	30 Dec '11	Status: withdrawn. Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang effective Dec 2017.
34	Bintang	Johor		SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1st Oct 2018, the mill has completed the selling off transaction

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

NO	Name of PT	Name of Mill	Location	Date of Certification	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	3-Jul-13	
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	Recertification of Bebunga POM is in progress.

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6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	
7	PT BAHARI GEMBIRA RIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	Recertification of Pondok Labu POM is in progress.
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	Land legalisation process for 4152.70 ha is still in process. Sungai Jernih Estate and the KKPA Estates has undergone audit. Land legalisation process is still in process.
12 13	PT LAGUNA MANDIRI	RANTAU BETUNG	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11 1-April-14	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification.
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	Land legalisation process for 308.35 ha is still in process.
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	

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18	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16 1-April-14	
19		MANDAH			
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	Land legalisation process for East Est for 5815.64 ha is still in process. Land legalisation for Sei Mawang is still in process
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru Mill. Perijinan' process is ongoing Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing HGU obtained as per May 2018
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	The properties was sold and currently SDP have no control in the management. A letter to RSPO Secretariat has been sent on 27 June 2019 on the confirmation of disposal of PT MAS and reported to Brusa Malaysia accordingly.

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

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

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

NO	Management Unit	Location	Date of Certification	Remarks
1	Sime Darby Plantation (Liberia) Grand Cape Mount	Grand Cape Mount County	NA	As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI). http://www.simedarbyplantation.com/media/press-releases/sime-darbyplantation-completes-divestment-of-its-liberia-operations