



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

**File Ref. : ES10170016**

**RSPO PUBLIC SUMMARY REPORT**

**CLIENT : SIME DARBY PLANTATION BERHAD – SOU 29 GIRAM**

**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 29 – Giram	Giram POM	4° 35' N	118° 12' E	Kilang Kelapa Sawit Giram, 91207 Kunak, Sabah
	Giram Estate	4° 35' N	118° 12' E	Giram Estate, 91207 Kunak, Sabah
	Mostyn Estate	4° 39' N	118° 07' E	Mostyn Estate, 91207 Kunak, Sabah

**MAP :** See Attachment 1

**AUDIT DATE :** 7th – 10th June 2022

**DURATION :** 18 auditor days

**TYPE OF AUDIT :**

☒ Annual Surveillance Audit No. 1 & 2

☐ Stage 2 Audit

**STANDARD: MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018**

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

**VALIDITY OF RSPO CERTIFICATE :** 13th July 2020 to 12th July 2025

**The following attachments form part of this report:**

Non-conformity Report(s) ☒

List of additional site(s) ☐

**Report by Audit Team Leader**

**Name :** DZULFIQAR AZMI

**Signature :**

**Date :** 15/09/2022

**Acknowledgement by Client's Representative**

**Name :** MOHD SYAFRIE BIN ASIS

**Signature :**

**Date :** 19/09/2022

## RSPO PUBLIC SUMMARY REPORT

### SUMMARY OF AUDITS

Recertification Audit				
On-site audit date	:	1 – 4 September 2020 (10 a.d)	No. of auditor days :	14 Auditor Days
Remote audit date	:	27 – 28 April 2020 (4.0 a.d)		
Audit team	:	Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar bin Kamaruzaman (LA remote), Rozaimee bin Ab Rahman		
No. of major NCR	:	4	Indicator: 2.1.1, 3.4.3, 3.7.1, 6.1.5	Closing date : 24/11/2020
No. of minor NCR	:	3	Indicator : 2.1.3, 3.3.2, 4.3.1	
Indicate the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities
	:	X	N/A	X
	:	Contract workers	NGOs	Govt. agency
	:	N/A		Independent growers
	:	Indigenous people	Contractor	Others (Please specify)
	:	N/A	N/A	
Supply base sampled	:	Mostyn Estate and Giram Estate		
Justification of audit planning	:	Total allocation of auditor days for Giram CU were: Mill = 3 days Mosty Estate and Giram Estate = 3.5 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification plus the verification of Land History and Land Title. Remote audit = 4 days.		
Changes since the last audit	:	No changes		
Report approved by	:	Kamini Sooriamorthy		Date: 24/12/2020

Annual Surveillance Audit 1 (Remote Audit 30%)				
On-site audit date	:	21 – 23 July 2021	No. of auditor days:	5 auditor days
Audit team	:	Dzulfiqar Azmi (LA), Mohd Zulfakar bin Kamaruzaman		
No. of major NCR	:	Nil	Indicator: NA	Closing date: NA
No. of minor NCR	:	Nil	Indicator: NA	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities
	:			
	:	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
	:			Independent growers / Smallholders
	:	Indigenous people	Contractor	Others (Please specify)
	:			
Supply base sampled	:	Mostyn Estate and Giram Estate		
Changes since the last audit	:	Changes of planted areas due to replanting of field and resurvey by R&D Precision and Agriculture Unit (Ms. Vijaya) on March 2021.		
Justification of audit planning	:	Remote Audit (30%).		
Report approved by	:	Kamini Sooriamorthy		Approval date : -

## RSPO PUBLIC SUMMARY REPORT

Annual Surveillance Audit 2 (Combined Audit with SA1)				
On-site audit date :	7th – 10th June 2022		No. of auditor days :	18 auditor days
Audit team :	Dzulfiqar Azmi (LA), Rohazimi Mat Nawi, Mohd Zulfakar Kamaruzaman, Razman Salim, Amir Bahari, Ismail Adnan			
No. of major NCR :	1	Indicator: 7.12.4		Closing date: 9/09/2022
No. of minor NCR :	3	Indicator: 5.2.1, 5.2.2, 7.3.1		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	X		X	X
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	Indigenous people	Contractor	Others (Please specify)	
		X		
Supply base sampled :	Mostyn Estate and Giram Estate			
Changes since the last audit :	Changes in planted ha is due to resurvey and updated GPS hectareage by R&D Precision and Agriculture Unit on March 2022. GPS team had conducted GPS mapping to update more accurate area statement in the SEMUA Field Master Data. The field hectareage has been updated in SAP system in March 2022 upon approval by Chief Executive Officer, Upstream Malaysia.			
Justification of audit planning :	Allocation of mandays during onsite: 6-man days balanced from remote audit ASA 1 and 12-man days ASA 2 to covers 1 POM and 2 estates. Combined audit ASA1-2021 & ASA 2-2022.			
Report approved by :	Kamini Sooriamorthy		Approval date : 15/09/2022	

Annual Surveillance Audit 3				
On-site audit date :			No. of auditor days :	
Audit team :				
No. of major NCR :		Indicator:		Closing date :
No. of minor NCR :		Indicator :		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	Indigenous people	Contractor	Others (Please specify)	
Supply base sampled :				
Changes since the last audit :				
Justification of audit planning :				
Name of peer reviewer :	NA			
Report approved by :			Approval date :	

## SUMMARY OF INFORMATION

## RSPO PUBLIC SUMMARY REPORT

**TABLE 1**

	RA	ASA 1	ASA 2	ASA 3	ASA 4
<b>Projection Period</b>	<b>Sep. 2020 to Aug. 2021</b>	<b>**Sep. 2021 to May 2022</b>	<b>June 2022 to May 2023</b>		
<b>Certified FFB Processed (MT)</b>	130,685.67	90,967.00	113,386.45		
<b>Production of Certified CPO (MT)</b>	31,233.88	19,580.55	24,849.37		
<b>Production of Certified PK (MT)</b>	7,841.14	4,161.40	5,670.88		
<b>Certified Areas (Ha)</b>	8,345.02	8,345.02	8,345.02		
<b>Planted Areas (Ha)</b>	7,471.32	*7,373.32	*7,373.32		
<b>Production Areas (Ha)</b>	5,744.94	5,459.33	5,459.33		
<b>HCV Areas / Conservation Areas (Ha)</b>	89.39	89.39	89.39		
<b>REMARKS</b>	*Changes in planted ha is due to resurvey and updated GPS hectarage by R&D Precision and Agriculture Unit on March 2022. GPS team had conducted GPS mapping to update more accurate area statement in the SEMUA Field Master Data. The field hectarage has been updated in SAP system in March 2022 upon approval by Chief Executive Officer, Upstream Malaysia. **Actual reporting period for this audit.				

**TABLE 2**

	CPO	PK
<b>Last years certified volume (MT)</b>	*44,732.04	*10,768.21
<b>Last years actual certified sold (MT)</b>	780.22	7,288.69
<b>Last years actual sold under other schemes (MT)</b>	0.00	0.00
<b>Last years sold conventional (MT)</b>	34,191.45	833.19
<b>New year certified volume (MT)</b>	24,849.37	5,670.88

\*Extensions of volumes were carried out in April 2022, additional amount PO = 13,498.16 MT & PK = 2,927.07 MT

1.0	AUDIT PROCESS	6
1.1	Certification body	6
1.2	Qualification of audit team	6
1.3	Audit methodology	7
1.4	Stakeholder consultation	7
1.5	Audit plan	9
1.6	Date of next audit	9
2.0	SCOPE OF CERTIFICATION AUDIT	9
2.1	Description of the certification unit	9
2.2	Description of the Supply Base (including planting profile)	9
2.3	Organization Information / Contact Person(s)	12
3.0	AUDIT FINDINGS	13
3.1	Changes to certified products in accordance with the production of the previous year	13
3.2	Progress and changes in time bound plan	13
3.3	Other changes (e.g. organizational structure, new contact person, addresses, etc.)	13
3.4	Status of previous non-conformities * (refer to Attachment 5)	13
3.5	Complaint received from stakeholder (if any)	13
4.0	DETAILS OF NON-CONFORMITY REPORT	13
4.1	For P&C (refer to Attachment 3)	13
4.2	For SC (refer to Attachment 3 – Supply Chain Requirements for Mills)	14
5.0	AUDIT CONCLUSION	14
6.0	RECOMMENDATION	14
	List of Attachment	
Attachment 1	: Map of CU	15
Attachment 2	: RSPO Audit Plan	17
Attachment 3	RSPO P&C Audit Checklist And Findings	24
Attachment 4	: Details of Non-conformities and Corrective Actions Taken	74
Attachment 5	: Status of Non-conformities Previously Identified	76
Attachment 6	: Time-bound Plan	80

## **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**

<b>Member of the Audit Team</b>	<b>Role/area of RSPO requirements</b>	<b>Qualifications</b>
Dzulfiqar Azmi	Lead Auditor / Safety, Environmental & GAP	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 6 years of working experience in the oil palm operation. He was qualified in the auditing line with experienced in Sustainability, EMS, Supply Chain, MSPO and RSPO audit since 2019.
Rohazimi Mat Nawi	Auditor / Environment, GHG	Hold B. Sc (Hons) Chemical_Gas Engineering from Universiti Teknologi Malaysia. He has been in the Plantations Industry with various company having served in Palm Oil Mill. He was qualified in the auditing line with experienced in Sustainability, QMS, EMS, OHSMS and Supply Chain audit since 2015.
Mohd. Zulfakar Kamaruzaman	Auditor / Supply Chain & Social External	Holds a B.Sc. Forestry. He had several years of working experience in the oil palm operation. He is a qualified RSPO P&C and RSPO Supply Chain Lead Auditor.
Mohd Razman Salim	Auditor / Social Internal	Possessed B.Sc.Forestry (Hons) from University Putra Malaysia with more than 6 years of working experience in the Forest Management, forest, HCVF and ecology.
Ismail Adnan Abdul Malek	Auditor / Social External & HCV	Holds a Master of Forestry, University of British Columbia, Canada. One year experience as Sub Assistant Conservator of Forest at the Pahang Forest Department and seven years spent as Forest Officer/Logging Superintendent at an integrated timber complex in Pahang. Currently, he is a Social Auditor for Forest Management System at Food, Agriculture and Forestry Section, SIRIM QAS International Sdn Bhd, since 2016.
Amir Bahari	Auditor / Occupational Health & Safety, GAP	Possessed B.Sc (Hons) USM 1985 and Diploma Palm Oil Milling Technology/Management 1996 MPOB. Working experience of 34 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.

**1.3 Audit methodology**

The audit was conducted combined with Surveillance Audit 1 for year 2021 (balance 70% onsite audit) and Surveillance Audit 2 for year 2022. The audit covered the Giram POM, Giram Estate and Mostyn Estate. The sampling conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

**1.4 Stakeholder Consultation**

SIRIM QAS International had initiated the stakeholder consultation by during the on-site audit. In general, there was no negative comments made against this Certification Unit. In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below:

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<p>The following were confirmed during the conduct of audit as there was no evidence to prove otherwise:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime.</li> <li>▪ They have been getting salaries above RM1,500 since May 2022. Salaries were paid before the 7th of every month.</li> <li>▪ No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment.</li> <li>▪ No discrimination between migrant workers and local workers, between male and female workers.</li> <li>▪ Comfortable housing with water and electricity provided.</li> <li>▪ Have access to affordable food from the canteen/sundry shops within the estate/mill premises.</li> <li>▪ Entitled to free medical facilities at the estate clinic.</li> <li>▪ Have representatives who attend regular meetings with the management where they can put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects.</li> <li>▪ They knew the types of work offered at Giram CU (mill &amp; estates) when they were in their countries of origin.</li> <li>▪ All migrant workers keep their own passports.</li> <li>▪ Shuttle services FOC once a month for workers go to nearest town.</li> <li>▪ Monthly recognition for workers i.e., highest harvesting productivity and housing cleanness</li> <li>▪ Alternate Sunday/Rest Work</li> </ul>

## RSPO PUBLIC SUMMARY REPORT

		<ul style="list-style-type: none"> <li>Complaint channel via various platform i.e., Suara Kami (Platform by Nestle), Impactt (Ulula), WMU Careline (From Region), Whistleblowing (HQ).</li> <li>Freedom Decision Movement by worker for medical access and leaving of workplace during rest or public holiday via implemented the Guideline Medical Access Procedure &amp; Guideline of Leaving of Workplace.</li> </ul>	
2) Settlers		<ul style="list-style-type: none"> <li>Not applicable. There are no settlers within SOU Giram</li> </ul>	
3) Villagers / Local communities (including women representatives, displaced communities)		<ul style="list-style-type: none"> <li>Heads/representatives of Kg. Simpang Empat, Kg. Selamat, Kg Sg Langgas, Kg Mostyn Lama, Kg Seri Bahagia &amp; Kg Kadazan Kg Cocos were interviewed. There were no issues raised by local communities. Outstanding issues had been resolved.</li> </ul>	
4) Suppliers		<ul style="list-style-type: none"> <li>Giram 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.</li> <li>Fair dealings with the units in Giram CU.</li> <li>Payments are made within 1 months of invoice.</li> </ul>	
5) Contract workers (local / migrant / Orang Asli workers / male & female)		<ul style="list-style-type: none"> <li>Contract workers mainly for FFB Drivers. So far, no issues was highlighted.</li> </ul>	
6) Local & national NGOs		<ul style="list-style-type: none"> <li>No issues were raised by local and national NGOs</li> </ul>	
7) Government agencies / Statutory bodies		<ul style="list-style-type: none"> <li>No issues were raised by Government agencies / Statutory bodies.</li> </ul>	
8) Independent growers / Smallholders		<ul style="list-style-type: none"> <li>Not applicable. SOU Giram is surrounded by other plantations, . Independent growers and small holders are located at a distance more than 10 km away from the CU boundaries. SOU Giram plantation boundary is not shared between independent growers and small holders.</li> </ul>	
9) Indigenous people		<ul style="list-style-type: none"> <li>Not applicable. There are no indigenous people living within or in vicinity of SOU Giram</li> </ul>	
10) Contractor		<ul style="list-style-type: none"> <li>All Contractors had provided services to Giram CU mill/estates for the past 4-5 years. Each signed a contract and understands contractual obligations and the need to comply with legal requirements. <ul style="list-style-type: none"> <li>a) Fair dealings with the units in Rajawali CU.</li> <li>b) Payments are made within 1 months of invoice.</li> <li>c) For transporter contractor, the estate mandore and staff will verify the work the contractor has done before his invoice can be approved for payment.</li> <li>d) All contractors' workers had attended RSPO training, signed COBC commitment statement and safety. briefing. The Company provides PPE (vest, goggles, straw hat)</li> <li>e) Suppliers of hardware and spare parts invoices were based on agreed quoted prices.</li> <li>f) Payment to contractors were made usually within 45 days of invoice. Renewal of contract is via tender system.</li> <li>g) Contractor and his workers knew about the minimum wages order requirement the</li> </ul> </li> </ul>	



## RSPO PUBLIC SUMMARY REPORT

		<p>workers make statutory contributions such as EPF and SOSCO. Workers details including names, pay slips, were presented for verification.</p> <p>h) All contractors also attended stakeholder meetings. Contractors must provide to the estates copies of their worker details and payslips.</p>
11) Previous land owner (if any)		<ul style="list-style-type: none"> <li>The Land Titles initially originated from 11 Smallholders and sold to Harrison's Malaysian Plantations Sdn Bhd in 1984-1992. The record of Transfer from the smallholders Harrison's Malaysian Plantations Sdn Bhd were sighted. The land was further sold to Golden Hope plantations in 1991 and after that, was merged by Sime Darby in 2008. The ownership and acquirement of the land titles under Sime Darby are still in progress (verified through the official letter from the Lands and Surveys Department of Sabah dated 17/06/2015 (PPHT/KNK:200-3/1/KLT.15(31)) on the issue. As of to date, some land title has been approved and ownership changed under the name of Sime Darby Plantation (Sabah) Sdn Bhd, however, some are still pending on the ownership name change due to cost restriction.</li> </ul>
12) Others (please specify)		<ul style="list-style-type: none"> <li>Sundry shop informed that he allows workers to buy goods either in cash or on credit. Previously there were cases where workers absconded and left the estate/mill without paying their debts. But this is becoming less and less.</li> </ul>

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 Giram Certification Unit (Giram CU) is one of the Strategic Operating Unit (SOU) of Sime Darby Plantation Sdn. Bhd. (SDPSB). Located in Kunak, Sabah, East Malaysia, the CU is also known as SOU 29. The CU was certified by SIRIM QAS International Sdn Bhd on 13th July 2015.

The Giram CU comprises of the Giram Palm Oil Mill (Giram POM) and two supply base i.e. the Giram Estate and Mostyn Estate. All the estates are owned by SDPB. The Giram POM has a mill capacity of 40 mt/hour. All the estates have been fully developed before 2005.

The CU did not have any certification scheme beside of RSPO/MSPO P&C and Supply Chain.

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

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

## RSPO PUBLIC SUMMARY REPORT

**Table 1: Actual FFB production by the supply base for the period from September 2020 to August 2021 & September 2021 to May 2022**

Supply Based	FFB Production (Sep. 2020 to Aug. 2021)		FFB Production (Sep. 2021 to May 2022)		Certifying CB
	Total Mt	Percentage (%)	Total Mt	Percentage (%)	
Giram Estate	55,325.47	49.80	33,464.35	37.00	SIRIM
Mostyn Estate	40,077.46	36.10	28,061.48	31.00	SIRIM
Sime Darby Sister Estates Segaliud & Sunggang Estate	125.14	0.10	1,319.59	1.00	BSI
OCP (non-certified)	15,558.41	14.00	28,211.38	31.00	N/A
<b>Grand Total</b>	<b>111,086.48</b>	<b>100.00</b>	<b>91,056.80</b>	<b>100.00</b>	

**Table 2: Projected FFB production by the supply base for the next reporting period June 2022 to May 2023**

Supply Based	FFB Contribution		Certifying CB
	Total Mt	Percentage (%)	
Giram Estate	58,691.06	39.00	SIRIM
Mostyn Estate	54,695.39	36.00	SIRIM
OCP (non-certified)	38,463.00	25.00	
<b>Grand Total</b>	<b>151,849.45</b>	<b>100.00</b>	

**Table 3: Actual FFB received and CPO & PK dispatch by Giram POM for period from September 2020 to August 2021 & September 2021 to May 2022**

RSPO Supply Chain Model: Mass Balance	September 2020 to August 2021	September 2021 to May 2022	Total (MT)
FFB Received	111,086.48	91,056.80	202,143.28
FFB Processed	111,122.31	90,967.00	202,089.31
Certified FFB Processed	95,563.90	62,755.62	158,319.52
Non-certified FFB Processed	15,558.41	28,211.38	43,769.79
<b>Crude Palm Oil (CPO)</b>			
Overall CPO Production	24,366.37	19,580.55	43,946.92
Certified CPO Production	21,171.52	13,800.15	34,971.67
Certified CPO delivered as RSPO	780.22	0	780.22
Certified CPO delivered as non-RSPO	20,391.30	13,800.15	34,191.45
Certified CPO delivered under other sustainable schemes	0.00	0.00	0.00
<b>Palm Kernel (PK)</b>			
Overall PK Production	5,636.71	4,161.40	9,798.11
Certified PK Production	5,159.46	2,962.42	8,121.88
Certified PK delivered as RSPO	5,071.60	2,217.09	7,288.69
Certified PK delivered as non-RSPO	87.86	745.33	833.19
Certified CPO delivered under other sustainable schemes	0.00	0.00	0.00
Credit traded under Book & Claim	10,000.00	17,000.00	27,000.00

# RSPO PUBLIC SUMMARY REPORT

**Table 4: Projected FFB received and CPO & PK dispatch by Giram POM of next reporting period  
June 2022 to May 2023**

RSPO Supply Chain Model: Mass Balance	Total (MT)
Certified FFB Processed	113,386.45
Certified CPO Production	24,849.37
Certified PK Production	5,670.88

**Table 5 Planted and certified area of the CU**

Estate	Planted (ha)	Certified (ha)
Giram Estate	3884.42	4166.98
Mostyn Estate	3488.90	4178.04
<b>Total</b>	<b>7373.32</b>	<b>8345.02</b>

Remarks:

Changes of planted areas for Giram Estate due to resurvey and updated GPS hectarage by R&D Precision and Agriculture Unit on March 2022.

**Table 6 Planting profile for Giram CU**

<u>Estate</u>	<u>Year of planting</u>	<u>Planting Cycle</u>	<u>Mature &gt;3 years (Ha)</u>	<u>Immature &lt; 3 years(Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Giram Estate	1995	1st	256.43	0.00	256.43	70.21	29.79
	1996	1st	423.13	0.00	423.13		
	1999	1st	310.61	0.00	310.61		
	2009	2nd	174.20	0.00	174.20		
	2011	2nd	350.30	0.00	350.30		
	2012	2nd	186.13	0.00	186.13		
	2013	2nd	176.71	0.00	176.71		
	2014	2nd	75.20	0.00	75.20		
	2015	2nd	147.71	0.00	147.71		
	2016	2nd	168.63	0.00	168.63		
	2018	2nd	458.32	0.00	458.32		
	2019	2nd	0.00	217.72	217.72		
	2020	2nd	0.00	302.88	302.88		
	2021	2nd	0.00	331.96	331.96		
	2022	2nd	0.00	304.49	304.49		
<b>Total Giram Estate</b>			<b>2727.37</b>	<b>1157.05</b>	<b>3884.42</b>	<b>70.21</b>	<b>29.79</b>
Mostyn Estate	1957	1st	1.88	0.00	1.88	70.21	29.79
	1994	1st	68.74	0.00	68.74		
	1995	1st	20.82	0.00	20.82		
	1996	1st	253.54	0.00	253.54		
	1997	1st	273.06	0.00	273.06		
	2002	1st	261.82	0.00	261.82		
	2003	1st	156.61	0.00	156.61		
	2005	1st	68.96	0.00	68.96		
	2007	2nd	13.52	0.00	13.52		
	2009	2nd	194.00	0.00	194.00		
	2010	2nd	211.82	0.00	211.82		
	2011	2nd	195.21	0.00	195.21		
	2013	2nd	206.86	0.00	206.86		
	2014	2nd	148.27	0.00	148.27		

## RSPO PUBLIC SUMMARY REPORT

	2015	2nd	107.65	0.00	107.65		
	2016	2nd	138.07	0.00	138.07		
	2017	2nd	123.62	0.00	123.62		
	2018	2nd	287.51	0.00	287.51		
	2019	2nd	0.00	180.13	180.13		
	2020	2nd	0.00	285.19	285.19		
	2021	2nd	0.00	200.6	200.6		
	2022	2nd	0.00	91.02	91.02		
<b>Total Mostyn Estate</b>			<b>2731.96</b>	<b>756.94</b>	<b>3488.90</b>	<b>78.30</b>	<b>21.70</b>
<b>Total</b>			<b>5459.33</b>	<b>1913.99</b>	<b>7373.32</b>	<b>74.04</b>	<b>25.96</b>

### 2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Nuqman Ismail Bin Mohamed Nawawi
Position	:	SQM SBR
Address	:	Sime Darby Plantation Sabah Regional Office Sabah, PO Box 135, 91007 Tawau, Sabah
Phone no.	:	012 - 2778404
Email	:	<a href="mailto:nuqman.ismail@sime-darbyplantation.com">nuqman.ismail@sime-darbyplantation.com</a>

### 3.0 AUDIT FINDINGS

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

Changes in planted ha is due to resurvey and updated GPS hectareage by R&D Precision and Agriculture Unit on March 2022. GPS team had conducted GPS mapping to update more accurate area statement in the SEMUA Field Master Data. The field hectareage has been updated in SAP system in March 2022 upon approval by Chief Executive Officer, Upstream Malaysia.

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

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

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

Details issues related to these were covered in the section - RSPO Certifications Systems for P&C and RISS, Nov 2020 in this report.

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

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

## RSPO PUBLIC SUMMARY REPORT

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

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

If no, please state reasons NA

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

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

No changes so far.

3.4 Status of previous non-conformities \* ☒ Closed ☐ Not closed\*  
 \* If not closed, minor non conformity will be upgraded to major non conformity

3.5. Complaint received from stakeholder (if any)

No negative feedback or comment was received during onsite audit.

### 4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s) List : 3 5.2.1, 5.2.2, 7.3.1  
 (details refer to Attachment 4 )

Total no. of major NCR(s) List : 1 7.12.4  
 (details refer to Attachment 4 )

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

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

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

### 5.0 AUDIT CONCLUSION

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

## RSPO PUBLIC SUMMARY REPORT

### 6.0 RECOMMENDATION

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

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

Audit Team Leader :

**DZULFIQAR AZMI**

(Name)

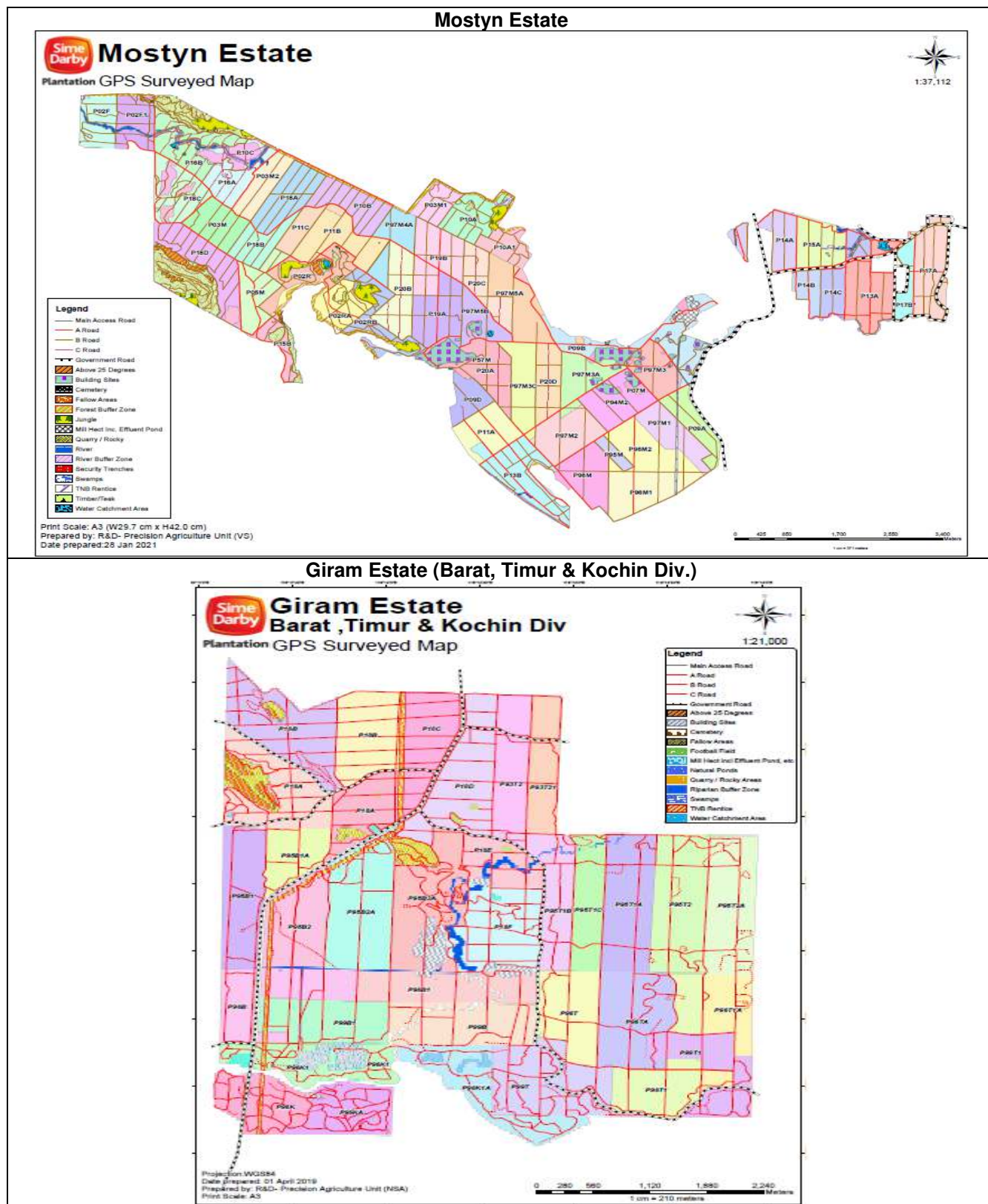


(Signature)

**09 / 09 / 2022**

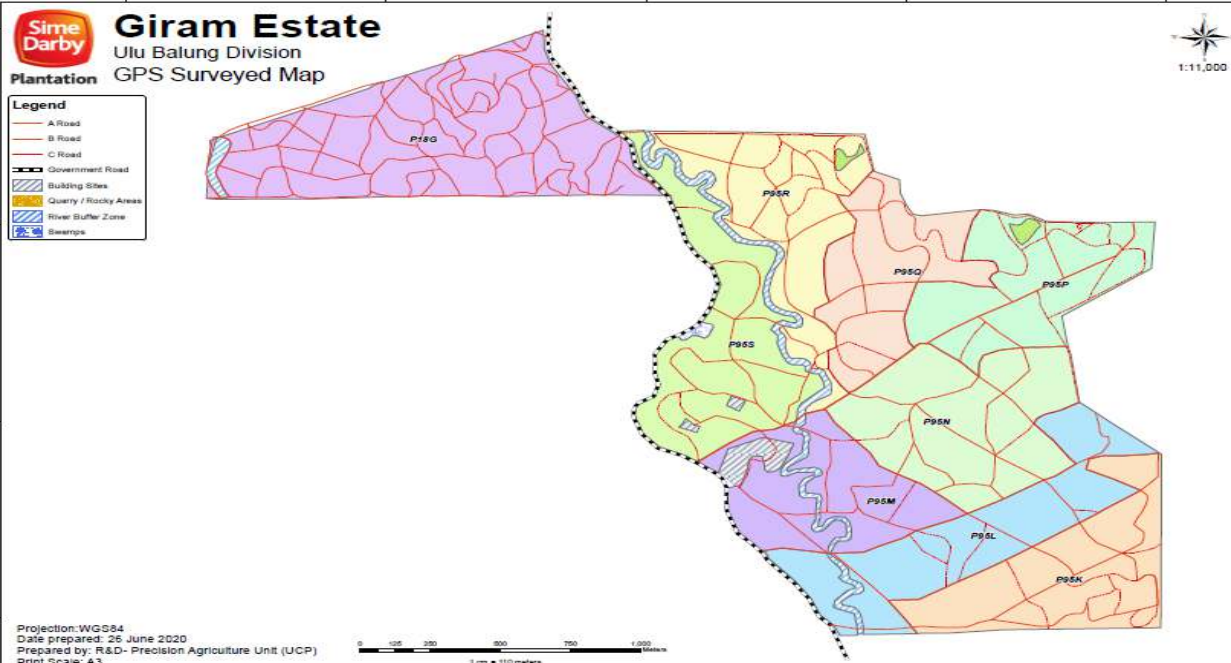
(Date)

Map SOU 29 GIRAM

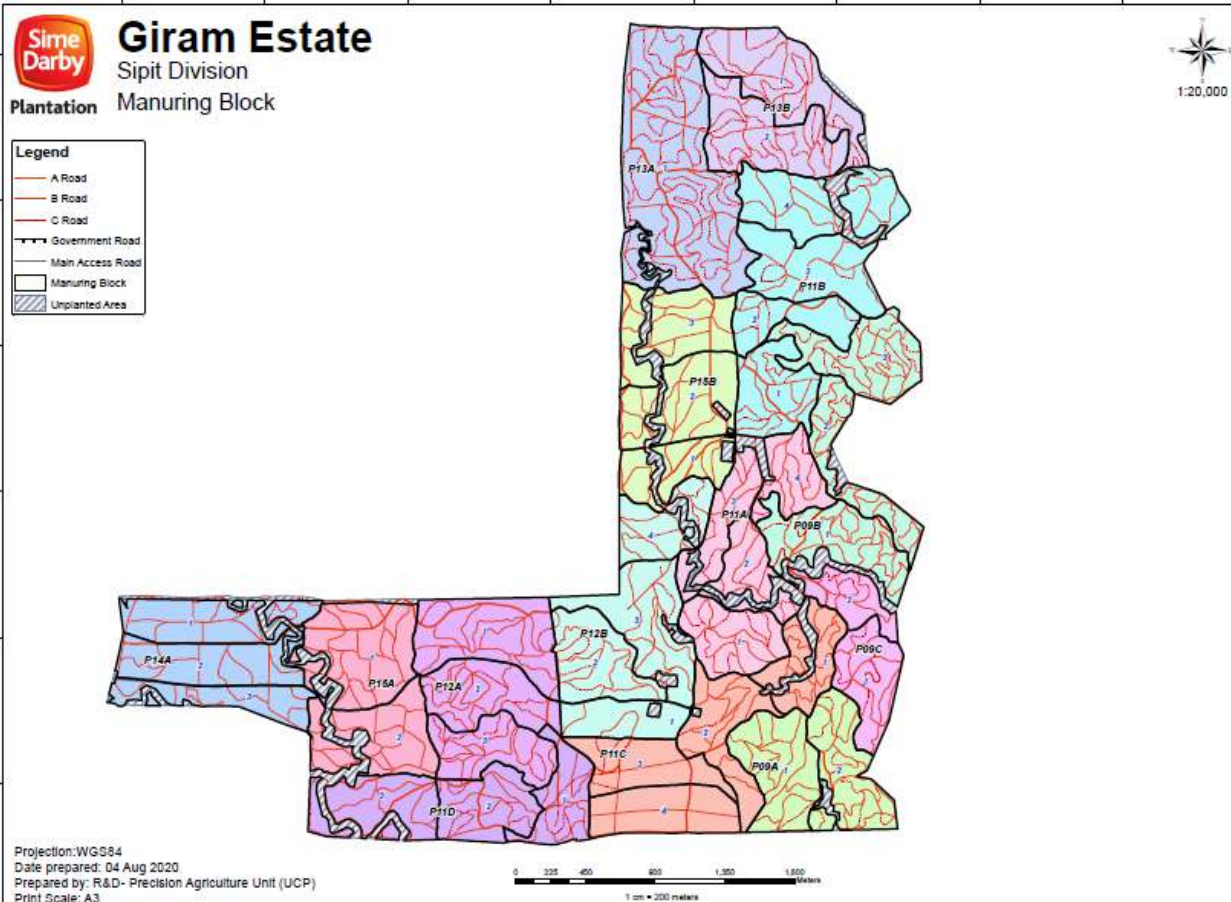




### Giram Estate (Ulu Balung Div.)



### Giram Estate (Sipit Div.)





**SURVEILLANCE  
RSPO AUDIT PLAN**

**a) Objectives**

The objectives of the audit are as follows:

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

e) **Date of assessment** : 7th to 10th June 2021

f) **Site of assessment** : SOU 29 Giram CU:  

- Giram POM
- Giram Estate
- Mostyn Estate

**g) Reference Standard:**

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

**h) Assessment Team**

Lead Auditor : Dzulfikar Azmi (Supply Chain, TPB, Metric Template, GHG)

Auditor : 1) Rohazimi Mat Nawi (Environment)  
 2) Mohd Zulfakar Kamaruzaman (Social – External)  
 3) Mohd Razman Salim (Social – Internal)  
 4) Amir Bahari (GAP, Safety)  
 5) Ismail Adnan (Soical – External, HCV)

Observer : N.A.

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

**i) Audit Method**

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

**j) 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.

**k) 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.

l) **Working Language** : English and Bahasa Malaysia

**m) Reporting**

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

**n) 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

a) **RSPO 2018 Principles and Criteria (P&C) Metrics Template**

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

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

- a) Reporting time frames for economic data are:
  - a) Calendar year (January to December): January 2021 to December 2021, and
  - b) 12-month period counting up to one months before audit month: Apr. 2021 to Mar. 2022
- b) Reporting time frames for demographic data:
  - a) For mill and estate workers: as of 31 December 2021
  - b) For smallholders and outgrowers: January 2021 to December 2021
- c) Reporting time frame for all other social and environmental data:
  - a) January 2021 to December 2021

The updated Metrics Template (as attached, the version 2.0) will be enforced from 1 August 2021. All audits conducted from 1 August 2021 onwards must use the updated Metrics Template (version 2.0).

**13. Assessment program details:** As below

## RSPO PUBLIC SUMMARY REPORT

**Day One: 07/06/2022 (Tuesday)**

Time	Activities / areas to be visited			Auditee
9.00 am	Opening Meeting for <b>Sime Darby Plantation Berhad – Sou 29 Giram</b> . Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.			All CU
9.20 am	Briefing on the organization background and implementation of RSPO at CU (including actions taken to address previous audit findings) by company Management Representative.			Management Representative
9.30 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at <b>Mostyn Estate</b>			Management Representative
9.45 am	To assign each audit team members – site and the P&C requirements			
	<b>Dzul &amp; Razman Mostyn Estate</b>	<b>Rohazimi &amp; Amir Mostyn Estate</b>	<b>Zulfakar &amp; Ismail Mostyn Estate</b>	
	<b>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:</b>	<b>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:</b>	<b>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:</b>	
	<ul style="list-style-type: none"> <li>▪ Facilities provided at line site inspection (i.e. worker quarters, mosque, surau, community center, School/CLC, Humana/Crèche, provision shop &amp; etc.</li> <li>▪ Production area – interview with workers at production area (harvesting, spraying, manuring, OP nursery, replanting area, peat area &amp; etc.)</li> <li>▪ Follow up from previous assessment findings.</li> <li>▪ Laws and regulations</li> <li>▪ Training and skill development programs</li> <li>▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.</li> <li>▪ Interview with Union/workers representatives</li> <li>▪ Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>▪ Workers Issues &amp; welfare</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment.</p>	<ul style="list-style-type: none"> <li>▪ Facilities at workplace inspection (water treatment plant, clinic, stores, workshop, landfill area &amp; etc.</li> <li>▪ Production area field inspections (harvesting, spraying, manuring, OP nursery, replanting area, peat area &amp; etc.)</li> <li>▪ Follow up from previous assessment findings.</li> <li>▪ Laws and regulations</li> <li>▪ Safety &amp; Health practice – witness activities at site</li> <li>▪ Hazard identification and Risk Management</li> <li>▪ Chemical management</li> <li>▪ Waste management including disposal site</li> <li>▪ Aspects/impacts of estate management</li> <li>▪ Pollution mitigating plans</li> <li>▪ Management and disposal of waste including pesticides containers</li> <li>▪ River system and Effluent Treatment/Discharge</li> <li>▪ Buffer/Riparian Zones</li> <li>▪ Controlled/open burning</li> <li>▪ Good Agriculture Practices</li> <li>▪ Training and skill development programs</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment.</p>	<ul style="list-style-type: none"> <li>▪ Interview with external stakeholders i.e. local communities, NGO, smallholders, etc.</li> <li>▪ Site visit at HCV, Mill/Estate Boundary, adjacent and neighbouring land use</li> <li>▪ Follow up from previous assessment findings.</li> <li>▪ Laws and regulations</li> <li>▪ Training and skill development programs</li> <li>▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.</li> <li>▪ Interview with Union/workers representatives</li> <li>▪ Interview with external stakeholders i.e. local communities, contractors, supplier, etc.</li> <li>▪ Consultation with relevant government agencies</li> <li>▪ Local communities and stakeholders</li> <li>▪ Local sustainable development</li> <li>▪ Support smallholder inclusion</li> <li>▪ Complaints and grievances</li> <li>▪ External stakeholders issues &amp; welfare</li> <li>▪ HCV/RTE and action plan</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment.</p>	

## RSPO PUBLIC SUMMARY REPORT

12.30 pm	<b>LUNCH BREAK &amp; ZUHUR PRAYER</b>
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records
5.00 pm	Audit team discussion / Interim closing / End of Day 1 audit
9.00pm	Discussion LA and teams on potential NCRs

### Day Two: 08/06/2022 (Wednesday)

Time	Activities / areas to be visited			Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at <b>Giram Estate</b>			Management Representative
9.15 am	To assign each audit team members – site and the P&C requirements			
	<b>Dzul &amp; Razman Giram Estate</b>	<b>Rohazimi &amp; Amir Giram Estate</b>	<b>Zulfakar &amp; Ismail Giram Estate</b>	
	<b>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:</b> <ul style="list-style-type: none"> <li>Facilities provided at line site inspection (i.e. worker quarters, mosque, surau, community center, School/CLC, Humana/Crèche, provision shop &amp; etc.</li> <li>Production area – interview with workers at production area (harvesting, spraying, manuring, OP nursery, replanting area, peat area &amp; etc.)</li> <li>Follow up from previous assessment findings.</li> <li>Laws and regulations</li> <li>Training and skill development programs</li> <li>Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.</li> <li>Interview with Union/workers representatives</li> <li>Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>Workers Issues &amp; welfare</li> <li>Continuous improvement</li> </ul> <p>Other area identified during the assessment.</p>	<b>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:</b> <ul style="list-style-type: none"> <li>Facilities at workplace inspection (water treatment plant, clinic, stores, workshop, landfill area &amp; etc.</li> <li>Production area field inspections (harvesting, spraying, manuring, OP nursery, replanting area, peat area &amp; etc.)</li> <li>Follow up from previous assessment findings.</li> <li>Laws and regulations</li> <li>Safety &amp; Health practice – witness activities at site</li> <li>Hazard identification and Risk Management</li> <li>Chemical management</li> <li>Waste management including disposal site</li> <li>Aspects/impacts of estate management</li> <li>Pollution mitigating plans</li> <li>Management and disposal of waste including pesticides containers</li> <li>River system and Effluent Treatment/Discharge</li> <li>Buffer/Riparian Zones</li> <li>Controlled/open burning</li> <li>Good Agriculture Practices</li> <li>Training and skill development programs</li> </ul>	<b>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:</b> <ul style="list-style-type: none"> <li>Interview with external stakeholders i.e. local communities, NGO, smallholders, etc.</li> <li>Site visit at HCV, Mill/Estate Boundary, adjacent and neighbouring land use</li> <li>Follow up from previous assessment findings.</li> <li>Laws and regulations</li> <li>Training and skill development programs</li> <li>Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.</li> <li>Interview with Union/workers representatives</li> <li>Interview with external stakeholders i.e. local communities, contractors, supplier, etc.</li> <li>Consultation with relevant government agencies</li> <li>Local communities and stakeholders</li> <li>Local sustainable development</li> <li>Support smallholder inclusion</li> <li>Complaints and grievances</li> <li>External stakeholders issues &amp; welfare</li> <li>HCV/RTE and action plan</li> </ul>	

## RSPO PUBLIC SUMMARY REPORT

		<ul style="list-style-type: none"> <li>Continuous improvement</li> </ul>	<ul style="list-style-type: none"> <li>Continuous improvement</li> </ul>
		Other area identified during the assessment.	Other area identified during the assessment.
12.30 pm	<b>LUNCH BREAK &amp; ZUHUR PRAYER</b>		
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records		
5.00 pm	Audit team discussion / Interim closing / End of Day 2 audit		
9.00pm	Discussion LA and teams on potential NCRs		

### Day Three: 09/06/2022 (Thursday)

Time	Activities / areas to be visited				Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at <b>Giram POM</b>				Management Representative
9.15 am	To assign each audit team members – site and the P&C requirements				
	<b>Dzul Giram POM</b>	<b>Razman Giram POM</b>	<b>Rohazimi &amp; Amir Giram POM</b>	<b>Zulfakar &amp; Ismail Giram POM</b>	
	<b>Site visit and assessment on Supply Chain Implementation including the:</b> <ul style="list-style-type: none"> <li>Model used</li> <li>General Chain of Custody</li> <li>System Requirements for the supply chain</li> <li>Documented procedures</li> <li>Purchasing and goods in</li> <li>Outsourcing activity</li> <li>Sales and goods out</li> <li>Processing</li> <li>Records keeping</li> <li>Registration</li> <li>Training</li> <li>Claims</li> </ul>	<b>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:</b> <ul style="list-style-type: none"> <li>Facilities provided at line site inspection (i.e. worker quarters, mosque, surau, community center, School/CLC, Humana/Crèche, provision shop &amp; etc.</li> <li>Production area – interview with workers at production area (work station, loading ramp, toilet &amp; etc.)</li> <li>Follow up from previous assessment findings.</li> <li>Laws and regulations</li> <li>Training and skill development programs</li> <li>Discussion with relevant management (CSR, community affairs) and view documentation such as SIA,</li> </ul>	<b>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:</b> <ul style="list-style-type: none"> <li>Facilities at workplace inspection (water treatment plant, clinic, stores, workshop, landfill area &amp; etc.</li> <li>Production area field inspections (work station, FFB loading ramp, effluent pond, biogas &amp; etc.)</li> <li>Follow up from previous assessment findings.</li> <li>Laws and regulations</li> <li>Safety &amp; Health practice – witness activities at site</li> <li>Hazard identification and Risk Management</li> <li>Chemical management</li> <li>Waste management including disposal</li> </ul>	<b>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:</b> <ul style="list-style-type: none"> <li>Interview with external stakeholders i.e. local communities, NGO, smallholders, etc.</li> <li>Site visit at HCV, Mill/Estate Boundary, adjacent and neighbouring land use</li> <li>Follow up from previous assessment findings.</li> <li>Laws and regulations</li> <li>Training and skill development programs</li> <li>Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.</li> <li>Interview with Union/workers representatives</li> </ul>	

## RSPO PUBLIC SUMMARY REPORT

		<p>assessment and management plans.</p> <ul style="list-style-type: none"> <li>▪ Interview with Union/workers representatives</li> <li>▪ Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>▪ Workers Issues &amp; welfare</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment.</p>	<p>site</p> <ul style="list-style-type: none"> <li>▪ Aspects/impacts of estate management</li> <li>▪ Pollution mitigating plans</li> <li>▪ Management and disposal of waste including pesticides containers</li> <li>▪ River system and Effluent Treatment/Discharge</li> <li>▪ Buffer/Riparian Zones</li> <li>▪ Controlled/open burning</li> <li>▪ Mill Best Practices</li> <li>▪ Training and skill development programs</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment.</p>	<ul style="list-style-type: none"> <li>▪ Interview with external stakeholders i.e. local communities, contractors, supplier, etc.</li> <li>▪ Consultation with relevant government agencies</li> <li>▪ Local communities and stakeholders</li> <li>▪ Local sustainable development</li> <li>▪ Support smallholder inclusion</li> <li>▪ Complaints and grievances</li> <li>▪ External stakeholders issues &amp; welfare</li> <li>▪ HCV/RTE and action plan</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment.</p>
12.30 pm	<b>LUNCH BREAK &amp; ZUHUR PRAYER</b>			
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records			
5.00 pm	Audit team discussion / Interim closing / End of Day 3 audit			
9.00pm	Discussion LA and teams on potential NCRs			

## RSPO PUBLIC SUMMARY REPORT

### Day Four: 10/06/2022 (Friday)

Time	Activities / areas to be visited			Auditee
9.00 am	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records			Management Representative
9.45 am	To assign each audit team members – site and the P&C requirements			
	<b>Dzul Unfinished area</b>	<b>Rohazimi &amp; Amir Unfinished area</b>	<b>Zulfakar Unfinished area</b>	
	<b>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:</b> Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	<b>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:</b> Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	<b>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:</b> Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	
12.30 pm	<b>LUNCH BREAK &amp; FIRDAY PRAYER</b>			
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records			
3.00 pm	Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager			
4.00 pm	Closing meeting at the CU / End of audit			

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

## RSPO PUBLIC SUMMARY REPORT

### Attachment 3

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

#### **Principle 1: Behave ethically and transparently**

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	SOU 29 Giram CU continued to use the internet to disseminate public information relating to company policies, land titles, human rights, FPIC, safety and health plans, pollution prevention plans and the procedure for complaints and grievances. The SDPB website address is <a href="http://www.simedarbyplantation.com/">http://www.simedarbyplantation.com/</a> . For social programmes on education, environment, community and health, etc, Yayasan Sime Darby as the Foundation has expanded its wings from offering scholarships to outstanding and deserving individuals to funding impactful conservation, outreach and development programmes. The SDPB website address <a href="http://www.yayasansimedarby.com/">http://www.yayasansimedarby.com/</a> .
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	Giram CU has conducted meeting with the stakeholder to share any new information on RSPO certification, environmental, social, safety and legal requirement applied to all operating units. All the stakeholders have raised some issue and discussed with the management during the meeting.
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	Requests for information and responses were maintained accordingly through the inspections book and letters in the mill and supply bases. The procedure for handling request for information is stated in Section 3 – Documentation and Communication of the Plantation Quality Management System Manual dated 01/11/2008. The Giram CU continued to maintain the records of requests for information and responses are maintained which included the government agencies/ regulatory bodies, local communities, etc. Management documents relating to environment, social and legal issues, were available to the public except for those prevented by commercial confidential or where disclosure of information would result in negative environmental or social outcomes. The CU has provided relevant information (environmental, social and/or legal) as requested by the relevant stakeholder during the annual stakeholder meeting.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	Sime Darby Plantation Berhad has developed an SOP known as Consultation and Communications procedures documented in the Standard Operating Manual (Version 1 Year 2008) dated 1 April 2008 entitled "Procedure for External Communications". A review of the records kept in the internal and external communication files found that the operating units at Giram CU followed the procedures and manuals developed by the



## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
			company. For 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. For external communications, they were mainly in the form of correspondence, which were kept in the External Communication File. The Stakeholder Consultation Procedure is another documented which identifies impacts of the Company's operations on its stakeholders based on interview, consultation, discussion and meetings with its stakeholders.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	Stakeholder list FY 2022 was established in both mill and estate. Stakeholder such as internal stakeholder i.e., workers leader, women leader, ethnic leader and external stakeholders i.e., local communities, authorities, contractors, suppliers, FFB suppliers and NGOs were included in the list. Nominated representative with contact number and address was sighted.
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	The Giram certification unit is subjected to Sime Darby Plantation Code of Business Conduct (COBC). It contains, among others, the following aspects of business conduct: Equal opportunity and non-discrimination, Criminal activities, Harassment and violence, Avoiding conflicts of interests, Guarding against bribery and corruption, How to report a violation, Anti-money laundering and anti-terrorism financing.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	Among the system in place to monitor compliance with of the COBC include internal audits conducted by the Group Integrity Governance Assurance Department, tender awards to be decided by tender committee to ensure independence and transparency; and vendor COBC developed to outline the standards of behaviour required by Sime Darby Berhad's vendors which includes expectation to uphold human rights. The Vendor COBC applies to all its suppliers, consultants, agents, contractors /service providers who have direct dealings with the Group. All vendors are required to declare their compliance through the Sime Darby Berhad Vendor Integrity Pledge which includes a declaration to eradicate all forms of exploitation, including but not limited to modern day slavery and human trafficking.

## RSPO PUBLIC SUMMARY REPORT

### **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 Giram CU continue to comply with most of the applicable laws and regulations.
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	YES	Giram CU had documented the Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment. Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4a: Procedure for Legal and Other Requirements. Changes to the law and regulation are monitored by the Sustainability Unit - Manager. Various sources were referred in obtaining information about the updates of legal requirements. This includes checking with the industrial association (e.g., MPOA, EMPA, SECA, etc.), attending seminar/conference, buying of the law books, government agencies websites, etc. The Giram CU was tracking any changes to applicable law and had Sime Darby Sustainability Compliance as the person responsible to monitor any changes to the law and to cascade those changes to all sites.
	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	Onsite verification during this audit, found sampled boundaries between Giram estate and Ulu Kalumpang Reserve Forest (FMU 27) was clearly demarcated and maintained with adequate signages; also the boundary between Block 09b, Mostyn estate and smallholder Lim Boon Sen was found clearly painted with signboards. A drain was also dug to represent the boundary between the estate and the smallholder. The boundary stone 325/30 marking Giram Estate boundary with the Forest Reserve was also sighted in the field.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	YES	The list of contracted parties are available in the stakeholder lists of all units within SOU 29 Giram, and duly updated when necessary with latest updated on January 2022. They include harvesting contractors, suppliers, transporters, replanting contractors, etc.
	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	There is evidence that agreements with third parties contain clauses on meeting applicable requirements. Evidence of legal due diligence carried out include getting the vendors to sign the Vendor Integrity Pledge where they undertake to comply with rules relating to labour and human rights, company ethics and management practices, and would comply with all laws and regulations relating to anti-bribery, fraud and corruption.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	YES	All contracts signed with contractors contain a clause on compliance with employment laws, which would include laws related to employment of children and young persons. Contractors also sign the Vendor Integrity Pledge in which Vendors undertake to comply with the Vendor COBC. The Vendor COBC in turn, contains provisions which state that Vendors shall not employ anyone under the age of 18 or the applicable minimum legal age in the countries they operate, unless in vocational and/ or formal and structured apprenticeship, educational and training programmes. Based on records available, interviews conducted, and observations made during the audit, there was no evidence of any young persons employed within SOU Giram.
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: a) Information on geo-location of FFB origins. b) Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder c) One or more supporting documents for claims d) Valid MPOB license	YES	Giram POM is currently established for the following for the directly source of FFB: <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins.</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>Valid MPOB</li> </ul> The evidence of currently document in the 'Desktop Review Assessment for New OCP Suppliers'. At present the mill possessed the Information on geo-location of FFB origins, valid MPOB licenses and OCP Land Title 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	Giram POM is currently established for the following for the indirectly source of FFB: <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins from smallholder surrounding.</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>Valid MPOB</li> </ul> The evidence of currently document in the 'Desktop Review Assessment for New OCP Suppliers'. At present the mill possessed the Information on geo-location of FFB origins, valid MPOB licenses and OCP Land Title for all the directly source FFB as verified by the auditor.

## RSPO PUBLIC SUMMARY REPORT

### **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	Giram POM and supply base have established and implemented its commitment to a long-term sustainability and financial viability through an operating expenditure /capital expenditure planning. The mill has a budget for financial year Jan - Dec comprises of the following components. <ul style="list-style-type: none"> <li>▪ Crop processed with anticipated extraction ratios including a 5-year forecast.</li> <li>▪ Cost components include the following</li> <li>▪ General charges statement</li> <li>▪ General charges</li> <li>▪ Cost of supervision/Cost of labour</li> <li>▪ Cost of other</li> <li>▪ Cost of RSPO/MSPO &amp; Other Management system</li> <li>▪ Capital expenditure statement</li> <li>▪ Building, utilities, welfare</li> <li>▪ Plant &amp; machinery</li> <li>▪ Office equipment</li> <li>▪ Furniture &amp; fittings</li> <li>▪ Electrical installation</li> <li>▪ Plant /Mill inclusive of processing /dispatch cost</li> </ul>
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	The replanting programs until 2026 were sighted for the estates. This program is reviewed once a year (latest being Jan 2022) and is incorporated in their annual financial budget. The replanting program until year 2026 has been reviewed.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	There were Management Review Meetings to discuss on issues related to sustainability status and compliance held by the estates and the mill. The minutes of meeting was established for all relevant meeting. Among others the agenda discussed were: <ul style="list-style-type: none"> <li>▪ Internal audit findings</li> <li>▪ Stakeholders feedback,</li> <li>▪ complaint and grievance</li> <li>▪ Status of preventive and corrective actions</li> <li>▪ Changes that could affect the management system</li> <li>▪ Recommendation for improvement</li> </ul>
3.2 The unit of certification regularly monitors	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main	YES	Continuous Improvement Plan has been implemented dated January 2022. The improvement plan outlined issues highlighted as per in the EAI as well as other reporting means i.e. internal audit as well as external audit. The management documents in relation to environmental plans and impact assessments were made available and maintained at all audited operating units.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	social and environmental impacts and opportunities of the unit of certification.		
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	YES	The monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template before the audit started. The auditor already verified and checked the data and figure given was tele with their database system.
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	Both the estates and the mill had an established mechanism to perform checking to ensure consistent implementation of procedures. All the records were kept for a minimum period of 12 months. In addition, the management adopted the following check and balances though visit of the following dept /superiors. Internal audit by the Agronomy Dept (Sustainability Unit) scheduled 2x/year for each unit. The exercise is to inspect and monitor compliance on ISCC/MSPO/RSPO standard requirement. Results from assessment of which are tabled and discussed during the Management Review. The mechanisms as established have been implemented. This is verified via the records maintained in all units daily, monthly and annually. Estates are monitored to ensure compliance against the SOP standard and factors relating to ESH.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	Both the estates and the mill had an established mechanism to perform checking to ensure consistent implementation of procedures. The Agronomy and Agricultural Services Department, Sustainability Unit, Plantation Head and relevant Head Office personnel including the Regional CEO/GM inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Other mechanism as described below. Records of PPE issued, and acknowledgement of receipt are maintained individually for all category of workers at mill and estates. Sighted common PPE issued included face masks respirators, goggles, safety shoes, harvesting shoes, rubber boots, nitrile/cotton gloves, apron and hard hat. In addition to basic PPE, special PPE are also provided for workers assigned to dangerous operation such as work at height and in confined space. All workers were provided with appropriate PPE where the cost is borne by the management. Interviews conducted during the site visit at the Mill and both estates showed understanding and approval from the workers that the management bares the cost of all PPEs, and the workers are entitled to valid PPE, the importance of always using required PPE during work and proper storage and disposal methods of PPE.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	The implementation of SOP is 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.
3.4 A comprehensive	3.4.1 (C) In new plantings or operations including mills, an	YES	There was no new planting in Giram CU. Environmental Aspect and Impact (EAI) and Social Impact Assessment (SIA) was conducted internally considering activities associated to estate and mill operations.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
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.	independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.		Thus, this indicator not applicable.
	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	Giram 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. The SIA has been carried out for SOU 29 Giram was sighted during the audit. Based on the sighted SIA report and the stakeholder consultations/meetings attendance records available, there is evidence that the SIA was carried out with the participation of the affected parties. The stakeholder consultations/meetings were attended by local communities, mandores, workers (harvesters, loaders, drivers, loose fruit collectors, watchmen, manurers, sprayers, and security personnel).
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	YES	The organization had established and updated in 2021 and 2022 their Environmental Management programme, Environmental Pollution Prevention Plan, Reduction of Natural resource plan and management and prevention of waterways. Among the action step been plan and implemented were training provided, signage and demarcation, engineering control and timely inspection. Sighted during site visit at mills and estates the control and mitigation action such as in workshop, store, boiler areas, monsoon drain and etc were well control by the operating units. In this audit, the Auditor had verified evidence that the Action Plans for each Estate and Mill had been reviewed (annually or earlier), implemented and updated in a participatory way. The Social Action Plan for FY2021 has been updated ensuing the Stakeholder meeting in June 2021. For FY2022, the SIA action Plan was reviewed after an external stakeholder meeting in May 2022 which had taken into account on the follow up issues regarding stray dogs. Evidence of letter/form of complaints regarding stray dogs had been sent by Giram Estate to the Kunak District Council, latest in Mar 2022 requesting action to resolve this issue. At the same time, Giram Estate had also taken action to assign APs to monitor the stray dog situation. The strays had also been transferred into the field away from housing areas as a safety precaution. For Giram Palm Oil Mill, the latest SIA Action Plan dated in Apr 2022 had in its agenda discussion on unsafe illegal electrical wiring by workers in their houses and activities of the Gender Committee at the POM.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings														
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	YES	Employment procedures for recruitment, selection, hiring, are documented. For locals, the procedures are in SOP on Hiring of Local workers. 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). This procedure was confirmed by a newly recruited worker at the visited mill and estates and verified through the worker's personal file as indicator 6.2.1 and 6.2.2. For migrant worker, the employment procedures are contained in Migrant Worker Responsible Recruitment Procedure date 20 August 2021. Employment procedures for retirement and termination are available in the local workers' employment contracts. Similarly, migrant workers' contracts also contain provision for mutual termination. Retirement procedure is not applicable to migrant workers. Promotion procedures are also stated in the procedure, but they are subject to annual performance indicator.														
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	Employment procedures are contained in internal document (hiring of local workers) and Migrant Worker Responsible Recruitment Procedure (hiring of migrant workers). Evidence of implementation is available from workers' files such as application form, interview, medical test and issuance of letter of offer.														
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	YES	The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following; a) Change in work process b) Revision/changes in legislative requirement c) Occurrence of accidents Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were displayed at all workstations in the mill and estate office and workshop. In general, the control measures were appropriate to the identified risks.														
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	SDP Health and Safety plan among others include the following: a) zero accident case in major accident (class I & class II). b) to achieve > 1,000,000-man hours without LTI c) to enhance OSH awareness through comprehensive ESH Training (target 70%). 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><th>No</th><th>Task</th><th>Activity</th></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></table>	No	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
No	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															

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings			
				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	Formal training programmes for FY 2021/2022 covered all aspects of the RSPO Principles and Criteria. Regular assessments of training needs were presented to auditors by the Giram CU. A training needs identification matrix has been established with target dates for the training to be conducted. Assessment of training consistently conducted after training completed were sighted and verified.			
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	The CU visited has established training plan base on the training need analysis conducted. The training plan covers all job designation including the contractors.			
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	YES	Appropriate training has conducted for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training focus on relevant Supply Chain related procedures and record. Training material was found to be adequate in addressing the standard requirements.			



## RSPO PUBLIC SUMMARY REPORT

### SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	<p>Identity Preserved Module</p> <p>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&amp;C, or against a Group Certification Scheme</p> <p>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.</p>	YES	Not applicable since this mill is Mass Balance.
3.8.2	<p>Mass balance Module</p> <p>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<sup>rd</sup> party certified supply base.</p>	YES	Giram POM received certified FFB from own Estate Which is Giram Estate and Mostyn estate. And Uncertified FFB from Surrounding Smallgrower and Small holder which is unspecified yet due to Mill only just downgraded in March 2020. Thus, Giram 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. Details as in Table 3 of this report
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	YES	This has been made available, as in Table 4 of this report.
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	YES	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information were: Name: Giram Oil Mill - Sime Darby Country: Malaysia. Member Category: Oil Mil Core product: Palm Oil Copy of Shipping Announcement was provided during the audit as evident of compliance to reporting requirement as listed by the standard.
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>- Complete and up to date procedures covering the</li> </ul>	YES	Giram POM had revised their documented procedure title 'Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia'.

## RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>implementation of all the elements of the supply chain model requirements.</p> <ul style="list-style-type: none"> <li>- Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>- Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard.</li> <li>- The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</li> </ul>		<ul style="list-style-type: none"> <li>- The procedure was kept in file RSPO Supply Chain and Traceability. Appropriate changes were also made in the change to include the Latest RSPO SCCS Requirement. Training focus on relevant Supply Chain related procedures and record. Training material was found to be adequate in addressing the standard requirements.</li> <li>- GPOM 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 GPOM manages the FFB from certified source. No issue regarding receiving Non-certified FFB as this mill is a MB Mill.</li> </ul>
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ol style="list-style-type: none"> <li>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>Effectively implements and maintains the standard requirements within its organisation.</li> <li>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.</li> </ol>	YES	<p>Internal audit procedure is available. Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2020 requirements.</p> <p>RSPO internal audit was conducted in March 2022 by 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 1 Major NCR were raised by auditor. Audit Findings, corrective action and root cause has been submitted to the internal auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor. Documented procedure has defined management review will be conducted once a year Management review meeting has been conducted in Apr 2022 (combine RSPO, RSPO SCCS and MSPO).</p>
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	YES	<p>GPOM had continued to receive certified FFB from own Estate Which is Giram Estate, and Mostyn Estate. And Uncertified FFB from Surrounding Smallgrower and Small holder which is 30 suppliers. The validity of the certificate of the supplier has been checked accordingly. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Monitoring records titled as <i>"RSPO &amp; MSPO Mass Balancing Records for Oil Mills"</i> has recorded the tonnage of certified FFB and its supplying estate.</p> <p>There is no overproduction sighted. SOU Giram has a mechanism in place for handling non-conforming oil palm products and/or documents as describe under</p>

## RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
			para 11.0 (non-confirming products and/or Documents) SOP Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia'.
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"> <li>a) The name and address of buyer;</li> <li>a) The name and address of the seller</li> <li>b) The leading or shipment/delivery date;</li> <li>c) The date on which the documents were issued;</li> <li>d) RSPO certificate number;</li> <li>e) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations);</li> <li>f) The quantity of the products delivered;</li> <li>g) Any related transport documentation</li> <li>h) A unique identification number</li> </ul>	YES	<p>The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Sime Darby Plantations Berhad and Global Trade Marketing Department (HQ) on behalf of Giram POM. Sample of deliveries document were sighted during the audit, and it was found all related information were adequate. Giram POM's RSPO certificate number and product name together with model used were stated in the delivery documents.</p>
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> <li>a) 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.</li> <li>b) The mill shall ensure the following: <ul style="list-style-type: none"> <li>c) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>d) 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.</li> <li>e) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>f) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly</li> </ul> </li> </ul>	YES	<p>There are 1 outsource company CPO transporter. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. There is a clause regarding Supply chain in the 'annexure 5' of agreement. Record of training in Sept 2021 for transporter contractor was sighted by the auditor.</p> <p>The RSPO Supply Chain procedure has described on Para 13.0 Outsource Contractor and briefed to the contractor.</p>

## RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	accredited CBs to the respective operations, systems, and all information, when this is announced in advance.		
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	YES	List of contact person for both transporters were made available and up-to-date in the stakeholder list. And was updated on 1/6/22.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	YES	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	YES	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up to date. Relevant record was maintained for more than 10 years as per SOP Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia'.
	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	
	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	Giram POM has maintained the Real Time basis accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record titled as "RSPO & MSPO Mass Balancing Record for Oil Mills".
	a) For Mass Balance Module, the mill: b) 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. c) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. d) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)	YES	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'.
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	Giram 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.

## RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	YES	Extraction rates has been updated monthly as per stated in Monthly Production Report (Physical Movement).
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	YES	Not Applicable since this mill is MB Mill
3.8.16	Registration of Transactions d) 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. e) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform	YES	Documented procedures related to sales and goods out were sighted and found adequate. The requirement of sales & goods out especially on notation of applicable Supply Chain model & Certificate number is being complied with as it was indicated in the weighbridge dispatch ticket. Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in). No remove transaction has been verified during actual period September 2020 to May 2022.
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	YES	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Giram POM has not use RSPO corporate logo as well as trademark logo.

## RSPO PUBLIC SUMMARY REPORT

### **Principle 4: Respect community and human rights and deliver benefits**

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

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	YES	The policy to respect human rights was documented in the Sime Darby Plantation's Human Right Charter Policy. This Policy states among others, that it will develop its businesses with a sense of humanity, ensuring that they are socially beneficial and do not infringe basic human rights. The Policy was communicated to stakeholders which included FFB suppliers during stakeholder meeting.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	There is no evidence that SOU 29 Giram 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).
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 29 Giram in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Procedures for handling Social Issues" dated 1 Nov 2010. The Mill and Estates within SOU 29 each 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.
	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. This was confirmed by foreign workers interviewed at the estates and mill.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is	YES	There is evidence that parties to a grievance are kept informed of the progress of the complaints. Actions taken following complaints on house defects were informed to the complainants and the repair update was acknowledged by the complainant on the same date.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	available and communicated to relevant stakeholders.		
	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	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 are included in the conflict resolution mechanism.
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	YES	The Estate management has identified and conduct a targeted meeting with each village representative to discuss contributions required. Sighted records also showed CSR contribution had been implemented for 2022 and 2021 to local communities. 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 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 FPIC process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	YES	Land titles for Giram Estate and Mostyn Estate are available. Giram POM is located within the land title of Giram Estate. The Land Titles for both Estate were verified.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by SOU Giram since 1984-1992. The audit team had confirmed that there were no land issues related to previous owners.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender	YES	The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kg. Simpang Empat, Kg. Selamat, Kg Sg Langgas, Kg Mostyn Lama, Kg Seri Bahagia & Kg Kadazan Kg Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram, hence the evidence required under this clause was not available.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	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.		
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	YES	
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	YES	
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Giram since 1984-1992. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate, hence the evidence required under this clause was not available. Map requirement is not applicable.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	This requirement in this indicator does not apply to SOU Giram.



## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	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	This requirement in this indicator does not apply to SOU Giram.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	This requirement in this indicator does not apply to SOU Giram.
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	YES	This requirement in this indicator does not apply to SOU Giram.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Giram since 1984-1992. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgas, Kg Selamat, Kg Mostyn Lama, Kg Skim Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram, Hence the evidence required under this clause was not available
	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	YES	As above. There were no issues regarding land with villagers, local community and neighbouring estate.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	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.		
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Giram since 1984-1992. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Giram since 1984-1992. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Giram since 1984-1992. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent	YES	There were no new lands acquired for plantation and mills after 15/11/2018. The current operation area including mill and estates as per stated in the land title.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	domain of the federal and state land acquisition legislations.		
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System, entitled "Procedures for Handling Boundaries Disputes". In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at mill and visited estates.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	YES	There were no scheme small holdings at SOU Giram. The Fresh Fruit Bunches are supplied from SDPB owned estates which are certified to RSPO and surrounding Smallholder which is not bound to Sime Darby and the Smallholder can send their FFB to another mill.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	YES	There was no issue on process and no outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System document, entitled "Procedures for Handling Boundaries Disputes". In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	YES	There was no issue on compensation (monetary or otherwise) with villagers, local community and neighbouring estate. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kg Seri Bahagia, Kg Simpang Ampat, Kg Sg Langgas, Kg Selamat, Kg Mostyn Lama, Kg Skim Cocos. From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram, hence the evidence required under this clause was not available. As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Giram since 1984-1992. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	As above.
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	YES	As above.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes implemented and accepted by the parties involved. In the case of newly acquired plantations, the CU addresses any unresolved conflict through appropriate conflict resolution mechanisms.	YES	As above.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	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 reqs.	YES	From the interviews, it can be concluded that there was no evidence of any land dispute at SOU Giram, hence the evidence required under this clause was not 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.	YES	

### **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	Giram POM has displayed the current prices paid for FFB at the mill's weighbridge counter. The FFB prices (OER) were displayed at the weighbridge.
	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 Giram regularly explains the FFB Pricing to Smallholders surrounding.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	In Giram POM Price for FFB adopted the MPOB Pricing..
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance,	YES	There is no bound contract for FFB outside supplier sending crop to the Giram 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.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.		
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	Consultations with Outsider suppliers confirmed that they understood the salient points in the agreement, namely contract duration, rate of payment, their obligations under the contract, etc. They also confirmed that contract entered into are valid, fair and transparent as the terms of payment are being negotiated upon prior to signing. 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.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	Weighing Equipment in SOU Giram has been calibrated on a yearly basis.
	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 Giram 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. 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. Additionally, there is also the "Whistle Blowing Channel" and Human Rights charter. 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.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
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.	NO	Sime Darby SOU Giram 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. However, no records of consultations 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. <i>Therefore, Minor NCR MZK 01 2022 has been raised against this indicator.</i>
	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).	NO	There were no records of development and implementation smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organizational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder) <i>Therefore, Minor NCR MZK 02 2022 has been raised against this indicator.</i>
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	Sime Darby SOU Giram 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 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. They had expressed their plan to focus on MSPO first.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	As above.
	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 Giram has created a system to trace their stakeholder around their estates. But so far growers and smallholders in Sabah are willing to join the WAGS to get certification but for smallholder in Sarawak doesn't want to involve because of financial restriction. But Sime Darby SOU Giram do have a report and always publicly available in their website.

## RSPO PUBLIC SUMMARY REPORT

### **Principle 6: Respect workers' rights and conditions**

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

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	YES	A Policy on equal opportunities and non-discrimination exists in SDP's Human Rights Charter 2020. Paragraph 3.2.5 of the HRC 2020 states that the Company would promote diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. It also states that the Company will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. Interviews conducted with workers confirmed the implementation of this Policy.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Based on documentation reviewed such as employment contracts and letters of offer, pay slips, allocation of houses at workers' housing and information obtained during audit interviews, there is no evidence that local and migrant workers, women and local communities have been discriminated against. Review of the contracts entered with recruitment agents dated in Apr 2019 stated that no recruitment fee is payable by migrant workers. Interviews conducted with migrant workers from Indonesia also confirmed that there is no discrimination and that they had not paid any recruitment fees.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	YES	Giram SOU was able to demonstrate that recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness appropriate for the job. Among the documents that are needed when applying for a job are job application form, identification documents, relevant certificates, medical test results. Interview of candidates will be done by Manager and the Assistant Managers where an evaluation form was filled up to determine the suitability of the candidate. These documents are contained in the workers' personal files.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	YES	Based on interviews with female workers, Estate Health Assistants and Medical Assistant, there was no evidence that pregnancy tests are being conducted as a discriminatory measure. Should a worker whose job encounters chemicals, e.g., sprayers, or lab assistants become pregnant, she would immediately be re-assigned to an alternative job employment that doesn't involve contact with chemicals.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	Gender Committee is in place at the Mill and all the Estates within Giram CU. The Gender committee comprised of female employees of all levels, including wives of male employees. Among the activities carried out by the Gender Committee include awareness briefings on sexual harassment, reproductive rights, domestic violence, how to lodge complaints and opportunities to improve members' income.
	6.1.6 There is evidence of equal pay for the	YES	Based on letters of job offer and monthly pay slips reviewed, evidence is available that



## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	same work scope.		workers receive equal pay for the same work scope.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	YES	Documentation of pay are available in the form of monthly pay slips, and conditions of pay are contained in employment contracts and letters of employment offer. Copies of these documents are provided to the workers. Briefing on relevant provisions on the Sabah Labour Ordinance (e.g. hours of work, rest day) Minimum Wages Order, were also given to the workers. Sighted were employment contracts of the following workers and their pay slips. Pay slips and employment contracts are prepared in workers language such as Bahasa, English, and Tagalog (Philippines). However, workers interviewed confirmed that they understand their contracts and were briefed to them by management officials before signing. They could seek clarifications if they need further explanation on their pay slips. Applicable labour laws, documentation of pay and conditions are contained in in employment contracts (for migrant workers), letters of employment offer (for Malaysian workers). The contracts contain conditions of pay and terms of employment related to contract duration, regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. The employment contracts are signed in dual language, namely English/Bahasa Malaysia. Records of trainings on their contracts of employment and wage calculation were also sighted during the audit.
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	YES	The employment contracts signed between the estate/mill management contain employment and payment terms and provisions covering duration of employment, place of work, salary, working hours, medical, accommodation, SOCSO, transportation, public holidays, sick leave, annual leave, mutual termination of service, etc. These are all in compliance with the provisions of the Sabah Labour Ordinance. The pay slip is the document that give accurate information on compensation for all work performed. It contains the following information: employee name, IC/passport, gang, month of pay, pay description, basic, price bonus, productivity incentive, allowances, deductions for SOCSO, EIS, KSWP, total income for the month, total deductions, net pay. None of the workers have family members working to help them with their work. Workers interviewed also confirmed that they were briefed on the contents of their employment contract prior to signing, and that they have also attended briefings where the terms and conditions of the employment contract and payslips were explained again. The workers also confirmed that they have understood the same.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday 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 Sabah 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

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
			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, Sabah. There is no evidence of termination, and so compliance with reasons for dismissal and period of notice could not be verified during this audit.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	YES	Evidence was available that Giram CU provide adequate housing and facilities to its Mill and Estate employees in accordance with the requirements of the national laws, which is the Workers' Minimum Standard of Housing and Amenities Act 1990. Each house generally has 3 rooms and accommodate between 1 to 5 workers, and are generally in a good state of repair. Houses at Giram CU are provided rent free with free water and electricity. However, electricity for Giram POM and Mostyn Estate are provided by the Sabah Electricity Sdn Bhd (SESB) and the bills are shared among occupants and deducted from their wages. Free medical treatment above is provided also to all workers and their dependants. A Visiting Medical Officer (VMO) comes and visits the clinics once a fortnight to see patients and supervise the work of the Health Assistants.
	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. Workers' access to their daily needs are from these shops. Items seen in the stores are adequate, clearly labelled and have not expired. To ensure prices of items sold are reasonable, prices of items sold in several supermarkets in Kunak were compiled by SQM and referred to as a basis for price comparison and monitoring.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.  PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living	YES	All sampled workers receive at least minimum wages based on Minimum Wages Order 2022 which came into effect on 1 May 2022. Giram POM, Giram Estate and Mostyn Estate have 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.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	<p>wage” is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following:</p> <ul style="list-style-type: none"> <li>- An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.</li> <li>- There is annual progress on the implementation of living wages</li> <li>- 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.</li> <li>- 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</li> </ul> <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. Migrant workers are full-time employees but have an annual renewal contract which is stipulated in their employment contracts. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	YES	Recognition of freedom of association is available in SDP’s Human Rights Charter 2020. Paragraph 3.2.4 states commitment to respect freedom of association, respecting the rights of employees to form and join unions and bargain collectively.
	6.3.2 Minutes of meetings between the unit	YES	Although there are no trade unions in Sabah, the workers have elected by way of an

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of ind. and free association and bargaining for all such personnel.	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.		election, their own workers' representatives to represent them on various issues.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	YES	Based on interviews held with workers, evidence was available that no management interference was present during the election of workers' representatives at Giram CU. Giram POM: Briefing record of 10 January 2022 was sighted where workers were briefed that they were to elect their own representatives.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	YES	The formal Policy on protection of children and non-employment of children is contained in paragraph 3.3 of SDP's Human Rights Charter 2020. Paragraph 3.3.1 states that the Company would eradicate child labour in its supply chain and would not employ anyone below the age of 18 years.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	YES	Documentary evidence is available that minimum age requirements are met. This is based on workers' check roll list and copies of their passport/NRIC details. Based on workers' NRIC and passports, all workers were at least 18 years old when employed. Observations made during audit visits also did not reveal the presence of any workers below the 18 years.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	There was no evidence of the employment of any young persons within Giram CU.
	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 against Child Labour is available in SDPB's Human Rights Charter 2020. This Policy was communicated to its internal and external stakeholders as evidenced by minutes of stakeholder meetings and trainings.
6.5 There is no harassment or abuse	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all	YES	The formal Policy on prevention of sexual and other forms of harassment and violence exists in SDP's Human Rights Charter 2020. This Policy is displayed at all main notice boards throughout the CU. Paragraph 3.2.6 of the HRC Charter 2020 states that the Company would create a working environment with zero tolerance for sexual harassment

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
in the workplace, and reproductive rights are protected.	levels of the workforce.		and abuse, in which violence is never used to resolve issues or conflict.
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	YES	The formal Policy to protect the reproductive rights of all, especially of women exists in SDP's Human Rights Charter 2020. This Policy is displayed at all main notice boards throughout the CU. Paragraph 3.2.5 states that the Company would facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. Communications on this Policy were also done during Gender Committee meetings. Based on interviews conducted with female workers at all units within Giram CU as well as with the Gender Committee members, this Policy is being implemented as they confirmed that their reproductive rights are assured i.e., freedom to plan their own family, paid maternity leave, right to take time off to nurse their child, and pregnant female workers are given light work.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	The needs of new mothers were assessed using form titled "New Mother Assessment Form".
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	YES	A grievance mechanism which respects anonymity and protects complainants is in place at the CU as per the Sime Darby Gender Committee Handbook 1st Edition 2014. Additionally, SDP has also established Suara Kami. According to the SOP for Suara Kami Helpline, this is an alternative independent third-party worker grievance channel with multi-languages and multi-interfaces (toll-free number, SMS and facebook) that assures worker confidentiality unless personal details are required, where in such situations, consent will be sought by the system receiver.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: a) Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) b) Charging the workers for recruitment fees c) Contract substitution d) Involuntary overtime e) Lack of freedom of workers to resign	YES	All units within Giram CU were able to demonstrate that all sampled workers have entered into employment voluntarily. Migrant workers (harvesters, sprayers, manurers, mill workers etc), have not been subjected to contract substitution and no discriminatory practices against migrant was observed. Giram CU was able to demonstrate that all sampled workers have entered into employment voluntarily. Migrant workers (harvesters, sprayers, mill workers), are not subjected to contract substitution and no discriminatory practices against migrant workers was observed. This is based on the following: <ul style="list-style-type: none"> <li>▪ review of sampled employment contracts which contain mutually agreed termination clause;</li> <li>▪ all migrant workers can keep their own passports.</li> <li>▪ review of recruitment agency contract between passport, medical in and biometrics in home country);</li> <li>▪ records of punch cards and workers confirmation that overtime work is mutually</li> </ul>

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	f) Penalty to the workers for termination of employment g) Debt bondage h) Withholding of wages		agreeable and not forced on them; <ul style="list-style-type: none"> <li>confirmation from the migrant workers that they received accurate briefing in their home country on the job they would be doing in Malaysia;</li> <li>and confirmation from the workers that there is no debt bondage or withholding of wages.</li> </ul>
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	Employment procedures for migrant workers exists under the procedure titled 'Migrant Worker Responsible Recruitment Procedure', was made available which provides the procedures for recruitment, selection and hiring. A post-arrival briefing is also given, in particular on the contents of their employment contracts, safety, benefits, etc. Based on observations and interviews with migrant workers (harvesters, sprayers, mill workers), there was no evidence of contract substitution and no discriminatory practices against migrant workers.
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	All the Estates / Mill Managers were appointed as the Chairman of the ESH committee. The letter of appointment for the Managers signed by the Regional CEO was sighted. The Managers subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the estates. Similar appointment was made for all the estates and the mill. All identified Executives were officially given a letter for such an appointment. The estates and the mill management conduct regular two-way communication with their employees through the quarterly ESH meeting.
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	YES	<p>The accident and emergency procedures are available in adherence to the SDPB policy on '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. Sighted distribution of First Aid Box recorded in both the estates. Procedures guidelines were issued by RSQM and amended to tailor to the situation differences in the estates and mills.</p> <p>ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The training 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. 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.</p>

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	YES	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, Mill workers, 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 and mill the PPE types for the various activities has been identified and implemented. Monitoring via Personal Protective Equipment Card and verified. Bulk of the mill training is organized during the daily briefing prior to work commencement of each shift. Mainly the issues discussed / briefed were related to mill process operations and safety compliance. These training records are maintained in a separate book and were sighted during the audit. Both the estates and the mill and maintained records of PPE issuance to their employees.
	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 Giram provides medical care to Group Estate workers with Klinik Ladang established within the premises. In addition all workers are covered by SOCSO, verified through 'Jadual Caruman Bulanan'. The 'Health Care' is managed by the respective estates. Giram Estate which is 1 km away provides medical facilities and services for Giram Palm Oil Mill's employees.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Accident statistics are being maintained and periodically reviewed (quarterly basis) during 'Health and Safety' committee meeting – minutes reviewed. All Incidences were investigated by the respective OU safety committee with JKKP 6 submitted respectively. Other regulatory documents being forwarded as per requirement. Documentation for all cases were sighted and verified. All units submitted the JKKP 8 in in 2021 and 2022 respectively complying with the DOSH statutory requirement.

## RSPO PUBLIC SUMMARY REPORT

### **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	The estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans. a) The estate had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. b) In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as <i>Turnera subulata</i> , <i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> , along the roadsides and designated points in the fields and also within the nursery perimeter. c) The plan also advocated single layer EFB mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. These monthly detection and observations were carried by staff. d) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year were recommended by the PC / Agronomist. Baiting is continued until bait acceptance threshold level.
	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	There was no land preparation in estates by burning ever since SDP practiced zero burning as specified in Item 5.3.6 on NO OPEN BURNING/USE OF FIRE. 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	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 Jan/April 2022 Mostyn/Giram respectively. The justification of agrochemicals use is available in the Oil Palm circulars, SOP, and Manuals to justify the usage of certain chemical for respective treatment. The justification is also described in the agronomist report.
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area	YES	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



## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	treated, amount of active ingredients applied per ha and number of applications) are provided.		<p>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 &amp; class IV pesticides.</p> <p>c) No illegal agrochemicals (stated by local and international laws) in particular paraquat were used in their estates.</p> <p>d) Variation of chemical usage are attributed to sizes of immature areas, rainfall pattern and the regeneration growth of weeds in different type of soil series. Explanatory notes for the usage vdate.ion was provided in the assessment.</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	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. The chemicals used for the estate are as provided in the SOP, Manuals and where necessary as advised by the RGM/Agronomist during visits.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	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.
	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 &amp; 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> <p>The review of the chemical register concluded that all pesticides used were of class II, III &amp; class IV. The use of paraquat had been prohibited in all SDP estates. 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>
	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	

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	YES	<p>Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the product.</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>c) The training included the safety aspects and usage of PPE when handling with pesticides. Records of training are shown in 3.7.2 and verified.</li> <li>d) All workers involved in pesticide application were provided with appropriate PPE and replaced when worn-out. PPE issuance &amp; replacement records were verified by the auditors.</li> <li>e) From interviews conducted with workers and staffs in the field and stores clerks it was established that they had been trained and were aware of safe handling procedure.</li> </ul>
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	<p>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).</p> <ul style="list-style-type: none"> <li>a) Records of purchase, storage and use were maintained.</li> <li>b) All store buildings were equipped with exhaust fans with the door secured.</li> <li>c) Only authorized personnel are assigned to handle the chemicals.</li> <li>d) All the chemicals were segregated in storage accordingly.</li> </ul> <p>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 SW409.</p>
	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 – Scheduled Wastes (Hazardous Waste).
	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	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.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	48 hours prior to application of aerial spraying.		
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	Medical surveillance as proposed in the CHRA was performed accordingly. The results for the entire team were positive and declared FIT to handle chemical. Giram Palm Oil Mill had delay in medical surveillance in 2021 due COVID outbreak in Aug 2021. Email from the RCEO office in relation to the issue was sighted and verified.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	YES	All the estates and mill in the CU complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation whereby. No work with pesticides is given to pregnant or breast-feeding women. <i>Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan</i> ). The estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.
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.	NO	The organization had maintained waste management plan for year 2021 & 2022. However, the certification unit had not fully adhered to their waste management plan hence <i>Minor NCR RMN 01 had been raised</i> . 1) Sighted at Mostyn Estate water treatment plant store found that hazardous waste such as Used Chemical sacks (PAC), electrical waste (DB board) and damaged knapsack pump were left unattended. 2) Sighted at Giram Estate landfill (Block 2013A) hazardous waste were found dumped inside such as used oil filters, empty paint container and empty lubricant drums.
	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. Records of sample Scheduled waste been sighted.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	Based site inspection, the unit of certification does not use open fire for waste disposal.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	SOU 29 continued to use and implement SOPs for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP 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 SOP. All the estates and mill operations were guided through the manuals and SOPs. The procedures as documented in the Agriculture Reference Manual were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The ARM included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings																																			
			Site inspection and interview with workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.																																			
	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 Sabah 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 the 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. In addition, during replanting, palms were felled, chipped, windowed 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 29 estates subject to the recommendation by the Agronomist.																																			
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. The soil series in the estates were classified as follows:</p> <table><tr><td></td><td colspan="2">Giram Estate</td><td colspan="2">Mostyn Estate</td></tr><tr><td></td><td>Soil series</td><td>Soil series</td><td>Soil series</td><td>Sogomana</td></tr><tr><td>1</td><td>Bedup</td><td>Tg Lipat</td><td>Binuang</td><td>Table</td></tr><tr><td>2</td><td>Jerangan</td><td>Apas</td><td>Bombalai</td><td>-</td></tr><tr><td>3</td><td>Sipit</td><td>Kumamai</td><td>Luba</td><td>-</td></tr><tr><td>4</td><td>Kumansi</td><td>Kanabukan</td><td>-</td><td>-</td></tr><tr><td>5</td><td>Paliu</td><td>-</td><td>-</td><td>-</td></tr></table> <p>There was significant ratio of acid sulphate soils in the SOU 29. Soil map is prepared by SDP R&amp;D -TTAS Precision Agriculture Unit updated in Dec 2021.</p>		Giram Estate		Mostyn Estate			Soil series	Soil series	Soil series	Sogomana	1	Bedup	Tg Lipat	Binuang	Table	2	Jerangan	Apas	Bombalai	-	3	Sipit	Kumamai	Luba	-	4	Kumansi	Kanabukan	-	-	5	Paliu	-	-	-
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## RSPO PUBLIC SUMMARY REPORT

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	7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	Like all SDPB Estates, the estates visited in SOU 29 continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by: b) Slope & River Protection Policy c) Buffer Zone & 25-degree slope and in item 8 Section 4 d) Land Preparation for Terracing in ARM Manual.  It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in some mature areas. The cover crop <i>mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>neprolepis biserrata</i> in the inter rows were sighted during the visit.
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	This compliance being addressed in the “ <i>Slope and River Protection</i> ” signed by the CEO dated Jan 2015 stating the following among others; “Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly”.
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	YES	As mentioned in 7.6.1 of this checklist and based on audit findings, there is no new planting in SOU Giram. Hence the requirement for the availability of maps identifying marginal and fragile soils does not apply.
	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 Giram. 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	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	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 29. The entire estates of SOU 26 had no new planting program during the audit period and forthcoming as recorded.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	YES	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 29. The entire estates of SOU 29 had no new planting program during the audit period and forthcoming as recorded.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
are managed responsibly.	PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat Land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).		
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 29. The entire estates of SOU 29 had no new planting program during the audit period and forthcoming as recorded.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	The water and ground cover management program are documented in the Sime Darby Agricultural Reference Manual (Water Management in Coastal and Peat lands). Individual estates and mill had their respective water management plan mainly to monitor among others the following; 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 waste water. 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	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 29. The entire estates of SOU 29 had no new planting program during the audit period and forthcoming as recorded.

## RSPO PUBLIC SUMMARY REPORT

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	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	YES	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 29. The entire estates of SOU 29 had no new planting program during the audit period and forthcoming as recorded.																			
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.	YES	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 29. The entire estates of SOU 29 had no new planting program during the audit period and forthcoming as recorded.																			
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	<div>The organization had established water management plan for year 2021 &amp; 2022. Among the action been initiated by operating units were:</div> <table><tr><th>Operating Unit</th><th>Action Plan</th><th>Status</th></tr><tr><td rowspan="2">Giram POM</td><td>Rain water harvesting for cleaning and washing</td><td>On going</td></tr><tr><td>Re stream from sterilizer condensate pit for dilution</td><td>On going</td></tr><tr><td rowspan="5">All Estates</td><td>Rain water harvesting for cleaning and washing</td><td>On going</td></tr><tr><td>Rain water harvesting for watering at nursery</td><td>On going</td></tr><tr><td>To identified natural waterways in the estates and comply with JPS guideline on minimum width for river reserve.</td><td>Completed</td></tr><tr><td>To place awareness signages</td><td>Completed</td></tr><tr><td>To maintain soft grasses in mature plantings at the inter row, field &amp; collection drains edges and roadsides.</td><td>On going</td></tr></table>	Operating Unit	Action Plan	Status	Giram POM	Rain water harvesting for cleaning and washing	On going	Re stream from sterilizer condensate pit for dilution	On going	All Estates	Rain water harvesting for cleaning and washing	On going	Rain water harvesting for watering at nursery	On going	To identified natural waterways in the estates and comply with JPS guideline on minimum width for river reserve.	Completed	To place awareness signages	Completed	To maintain soft grasses in mature plantings at the inter row, field & collection drains edges and roadsides.	On going
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	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	Monitoring of river water quality been conducted by operating units. Sighted pesticide analysis test report and water analysis test report conducted. Overall, no sign of pollution from estate operation concludes by external lab.																			
	7.8.1b Workers have adequate access to clean water.	YES	The estate own water treatment plant and been supply to domestic used. Result of microbiology water samples & water analysis were reviewed during audit.																			
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in	YES	The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. The guidelines are detailed in the Responsible Agriculture																			

## RSPO PUBLIC SUMMARY REPORT

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	line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).		Charter Revised 2020 and Guideline on Riparian Reserve Management in Sime Darby Plantations. Sampled during site visit such found well-maintained and protected riparian area with signages and marking during site visit. There was no spraying activities or signs left in such an area.																								
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	YES	The organization had regularly monitored and reported effluent parameter to DOE. Reviewed during audit.																								
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	The monitoring of mill water usage been conducted. Sighted the average water consumption are optimize by the mill.																								
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	The organization had maintained and established Fossil Fuel Reduction Plan with latest updated in May 2022. Among the strategies been plan and executed by the operating units were: 1.Scheduled maintenance for machineries and vehicles. 2.Awareness to employee on reduce fuel usage 3.Ensure nozzle is always locked to avoid unauthorized diesel filling																								
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	YES	<div>The CU had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. For input FY 2021, the report sends to RSPO on 07/06/2022. The input data was verified and the following were determined:</div> <table><tr><th>Description</th><th>tCO<sub>2</sub>e/tProduct</th><th>Production</th><th>t/yr</th></tr><tr><td>CPO</td><td>1.43</td><td>FFB Processed</td><td>124,660.90</td></tr><tr><td>PK</td><td>1.43</td><td>CPO Processed</td><td>27,190.20</td></tr></table> <div><table><tr><th>Land Use</th><th>Ha</th></tr><tr><td>OP Planted on Mineral Soil</td><td>11,747.78</td></tr><tr><td>OP Planted on Peat Soil</td><td>0.00</td></tr><tr><td>Total oil palm planted area</td><td>11,747.78</td></tr><tr><td>Conservation (forested)</td><td>0.00</td></tr><tr><td>Conservation (non-forested)</td><td>89.39</td></tr></table></div>	Description	tCO <sub>2</sub> e/tProduct	Production	t/yr	CPO	1.43	FFB Processed	124,660.90	PK	1.43	CPO Processed	27,190.20	Land Use	Ha	OP Planted on Mineral Soil	11,747.78	OP Planted on Peat Soil	0.00	Total oil palm planted area	11,747.78	Conservation (forested)	0.00	Conservation (non-forested)	89.39
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## RSPO PUBLIC SUMMARY REPORT

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			Milling extraction rate:			
			OER	21.81		
			KER	4.76		
			Mill Emission			
			Emission source	tCO2e	tCO2e/tFFB	
			POME	24,435.65	0.20	
			Fuel consumption	935.35	0.01	
			Grid electricity utilisation	119.92	0.00	
			Credits			
			Export of excess electricity to housing & grid			
			Sale of PKS	0.00	0.00	
			Sale of EFB	0.00	0.00	
			Total	25,490.91	0.20	
			Plantation / field emission			
			Emission sources	tCO2e	Own tCO2e/ha	tCO2e/FFB
			Land Conversion	66,775.99	9.01	0.70
			CO2 Emissions from Fertiliser	4,245.52	0.57	0.04
			N2O Emissions from Peat	0.00	0.00	0.00
			N2O Emissions from Fertiliser	2,436.40	0.33	0.03
			Fuel Consumption	483.61	0.07	0.01
			Peat Oxidation	0.00	0.00	0.00
			Sinks			
			Crop Sequestration	-56,350.79	-7.61	-0.59
			Conservation Sequestration	0.00	0.00	0.00
			Total	17590.72	2.37	0.18
			Palm Oil Mill Effluent (POME) Treatment			
			Diverted to compost	0%		
			Diverted to anaerobic digestion	100%		

## RSPO PUBLIC SUMMARY REPORT

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			<div>Diverted to Anaerobic Digestion</div> <table><tr><td>Diverted to anaerobic pond</td><td>100%</td></tr><tr><td>Diverted to methane capture (flaring)</td><td>0%</td></tr><tr><td>Diverted to methane capture (electricity generation)</td><td>0%</td></tr></table>	Diverted to anaerobic pond	100%	Diverted to methane capture (flaring)	0%	Diverted to methane capture (electricity generation)	0%																					
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	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	YES	Auditor has verified through checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , 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 Giram 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	<div>For GPOM, identified significant pollutants been addressed by the management. Sighted the progress of mitigating measures been monitored as per table below:</div> <table><tr><td>Environmental Issue</td><td>Mitigating Measures</td><td>Status</td></tr><tr><td>Black Smoke emission</td><td>ESP under construction with new boiler</td><td>On going</td></tr><tr><td>Effluent discharge</td><td>Tertiary plant treatment</td><td>On going</td></tr><tr><td>Scheduled waste</td><td>Sending it to authorize waste collector for disposal</td><td>On going</td></tr></table> <div>For estate identified significant pollutants been addressed by the management. Sighted the progress of mitigating measures been monitored as per table below:</div> <table><tr><td>Environmental Issue</td><td>Mitigating Measures</td><td>Status</td></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 &amp; awareness</td><td>On going</td></tr><tr><td>Air pollution from vehicle</td><td>Frequently maintenance on the vehicle used for complete combustion</td><td>On going</td></tr><tr><td>Scheduled waste</td><td>Sending it to authorize collector for disposal</td><td>On going</td></tr></table>	Environmental Issue	Mitigating Measures	Status	Black Smoke emission	ESP under construction with new boiler	On going	Effluent discharge	Tertiary plant treatment	On going	Scheduled waste	Sending it to authorize waste collector for disposal	On going	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	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
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7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	Guided by SDPB ARM, preparation of replanting using fire is not allowed. Based on site visit at at SOU Giram estates, there was no trace of burning observed. Palm trunks were chipped and windrowed at estates conducting replanting.																											
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	The fire prevention and control measures is established in SDPB group level and operating unit level. For Group level, Zero Burning Policy has been established and monitoring of Hotspot using the PLATINUM platform. The monitoring was established since November 2013. The system monitors any possible occurrence of fire within or nearby the concession																											

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
			areas throughout Sime Darby Plantation Upstream operation globally. At the estates level, there are fire prevention team established. Among the mechanisms to prevent fire are training on firefighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	During external stakeholder meeting in May 2022 that was carried out at Giram CU, all stakeholders including neighbor was briefed on fire prevention and control measures.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	YES	No new land clearing since Nov 2015 available at SOU Giram, thus this Indicator is not applicable.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	Identification and assessment of HCV habitats and protected areas within landholdings; and attempt assessments of HCV habitats and protected areas surrounding landholdings was conducted in 2013. A report titled 'HCV Re-Assessment for Strategic Operating Unit (SOU) Sabah Central – South Zone – Jan 2014 (Version II)' was available and verified. The assessment had covered all the High Conservation Value (HCV) within and adjacent to their estates. The SOU Giram had identified the significant HCV as reported in the assessment report, concluded that the total of their HCV area is 89.39 Ha. There was no RTE observed present in the SOU in the Reassessment.
	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 Nov 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	YES	
	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	NO	The CU had a regular programme to educate its employees pertaining to the protection of the RTE as well as the protection of buffer zone. The CU has conducted a regular patrol of HCV areas, access and boundary of estates. Record showed that patrolling of HCV and boundary were conducted accordingly. Signage, such as "No Hunting", "No Fishing", "Buffer Zone" were available. No use of chemicals observed been applied in the buffer zone as prohibited by the CU. The detailed action plan concerning HCV are contained in the "Biodiversity Management Programme for Financial Year 2021" and "Biodiversity Management Programme for Financial Year 2022" for Giram Estate; for Mostyn Estate, the

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	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.		'HCV Action Plan (Continuous)' updated. However, reviewed records and stakeholder's consultation during the audit found the HC/Biodiversity Management/Action Plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas was not fully implemented and adapted by SOU Giram where necessary. The integrated management plan/HCV Action Plan 2022 was not developed in collaboration with other stakeholders. Evidence of attempted collaboration efforts was not documented and available. Besides that, RTE Identification was incomplete: <i>Hence, a Major NCR against Indicator 7.12.4 (ISMA 01/ 2022) was therefore raised.</i>
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 Nov 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	YES	HCV Re Assessment has been done on April 2014, but no rights of local communities have been identified in HCV areas. Thus, this indicator was not applicable.
	7.12.6 RTE species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	YES	The CU has regularly educated its employees via morning muster briefing about the need to protect the RTE species. Appropriate disciplinary measures will be taken if found violated. Information pertaining RTE and relevant CU policies were displayed at the morning muster station. Auditor has verified HCV training record titled 'Taklimat HCV'.
	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	The CU had continued to monitor its HCV areas and presence of RTE. On-going monitoring of the HCV area at Mostyn Estate and Giram Estate was conducted accordingly.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	YES	Not applicable since there is no new land clearing

## RSPO PUBLIC SUMMARY REPORT

### 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>Sime Darby Plantation (SDP) membership is before 2018 and time bound plan maximum up to 30th June 2023. As at January 2022, no deviation of TBP and approval by RSPO Secretariat are not required. SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Currently, only Indonesia operation yet to be certified.</p> <p><b><u>Indonesia Operations – as of January 2022</u></b></p> <p><b>PT Bahari Gembira Ria</b> 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 &amp; Report for PT BGR - <a href="https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioYJEAZ">https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P9000001OioYJEAZ</a></p> <p><b>PT Sandika Natapalma</b> Only Karya Palma Estate yet to be certified - Pending confirmation from Badan Pertanahan National (BPN) on Hak Guna Usaha (HGU) Document.</p> <p><b>PT Budidaya Agro Lestari</b> Only Beturus (PT BAL) Estate yet to be certified – HGU obtained as per May 2018. However never been released by BPN.</p> <p><b>PT Guthrie Pecconina</b> Sg Jernih Estate and KKPA was separated in 2022 and recorded separately. 890.98 Ha – still under Land legalisation process and process Kadastral.</p> <p><b>PT Sime Indo Agro</b> Only East Estate/Sei Mawang Estate yet to be certified – Land legalisation process for East Estate for 5,815.64 ha is still in process.</p> <p><b>PT Bina Sains Cemerlang</b> Sungai Pinang Estate &amp; Bukit Pinang Estate yet to be certified – Land legalisation process for 308.35 ha is still in process.</p>

## RSPO PUBLIC SUMMARY REPORT

				<p><b><u>Liberia Operations – as of January 2020</u></b>  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).  <a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations">http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</a>  <b><u>New Britain Palm Oil (NBPOL) Operations – as of March 2021</u></b>  <b>Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.</b>  Last Certified on 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.</p>
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	Yes	There are six (6) CU in Indonesia Operations highlighted in the time-bound plan and the certification progress consistent with that in the time-bound plan. The progress details as provided in the TBP in Attachment 6. The Sustainability Section team have conducted the periodic internal audit accordingly.
	(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 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	Sime Darby Plantation (SDP) membership is before 2018 and time bound plan maximum up to 30th June 2023. As at January 2022, no deviation of TBP and approval by RSPO Secretarial are not required. SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Currently, only Indonesia operation yet to be certified.
	(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	The details of the Time Bound Plan described as per attachment 6. SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP. As of this audit and Verification of documents and Timebound Plan there are no isolated lapses and fundamental failure to proceed with implementation of the plan in implementation of a time-bound plan

## RSPO PUBLIC SUMMARY REPORT

5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. Any new plantings since 1 <sup>st</sup> January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	Yes	Verification through <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , GOOGLE maps data, estates maps and through HCV assessment report, and planting profile evidenced that there was no new planting and no new development of area observed. Support also with internal and external audit (ISPO certified) there was no replacement of primary forest or HCV areas in the uncertified management unit. Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units.
	(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	No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as both sites was disposed. The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancies between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of 14/07/2021, 10 LUCAs were approved with 0 conservation liability and remaining 9 are still pending from RSPO.
	(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 6 uncertified units of Sime Darby Plantation Sdn Bhd - Indonesia as at January 2022.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	Yes	Sime Darby Plantation maintain corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.
	(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, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:	Yes	The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue are mainly awaiting for Land Titles. The last audit was conducted between July 2020 and August 2021. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.

## RSPO PUBLIC SUMMARY REPORT

		<ul style="list-style-type: none"> <li>● 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;</li> </ul>	Yes	<p>No critical (Major) non-compliance raised against any of the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.</p> <p>Respective sites-maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company.</p> <p>For TBP dated March 2021, there was several CUs located in Indonesia and 1 unit in Papua New Guinea (NBPOL) not yet completed. Summarized as below:</p> <p><b>Land legalization</b> – PT Guthrie Pecconina, PT Bina Sains Cemerlang, PT Sime Indo Agro (INA)</p> <p><b>Surat perijinan in progress</b> (Jadual Pematuhan) – PT Sandika Natapalma/PT Budidaya Agro Lestari (INA)</p> <p><b>NPP</b> – Markham Farming &amp; Markham Agro (NBPOL)</p> <p><b>Sold off</b> – PT Mitral Austral Sejahtera (INA), Sime Darby Plantation Grand Cape Mount (Liberia).</p>
		<ul style="list-style-type: none"> <li>● Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.</li> </ul>	Yes	
		<ul style="list-style-type: none"> <li>● Desktop study e.g. web check on relevant complaints</li> </ul>	Yes	
		<ul style="list-style-type: none"> <li>● If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.</li> </ul>	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	



## RSPO PUBLIC SUMMARY REPORT

<p>5.6.6</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>		No additional indicators	Yes	<p>As it has been mentioned in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by SOU Giram since 1984-1992. 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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## RSPO PUBLIC SUMMARY REPORT

### 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
7.12.4 ISMA 01 2022	Major	<p>Finding: An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas was not fully implemented and adapted where necessary and contains monitoring requirements. The integrated management plan was not developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>Objective evidence: The integrated management plan/HCV Action Plan 2022 was not developed in collaboration with other stakeholders. Evidence of attempted collaboration efforts was not documented and available. Besides that, RTE Identification was incomplete:</p> <ol style="list-style-type: none"> <li>1) An inventory of RTE species in Giram CU was incomplete. Presence of RTE species was evidenced by the following: <ol style="list-style-type: none"> <li>a. During site visit to Mostyn Estate by the auditor, a group of <i>Macaca nemestrina</i> (Pigtail Macaque) was sighted in the field 97M3A. This species is classified as endangered under IUCN Red List and listed under Appendix II under CITES.</li> <li>b. Review of the HCV Monitoring records (2022 and 2021) for Giram Estate showed Hornbill (<i>Enggang</i>), Muntjac (<i>Kijang</i>), Deer (<i>Rusa</i>), Crocodile (<i>Buaya</i>) were sighted and recorded. The sighting was in areas in proximity of boundary between Giram Estate (Block 95R, 2013B, 2009B and 2014A) and Ulu Balung Forest Reserve. These species are protected under the Wildlife Conservation Enactment 1997 for Sabah and CITES for protection.</li> </ol> </li> <li>2) Action Plan to manage RTE species in Giram CU was not comprehensive such as no collaboration with other stakeholders i.e., Wildlife Department, local communities, etc.</li> <li>3) Responsible measures to resolve human-wildlife conflicts was not developed.</li> </ol>	<p>Root cause: No proper engagement made with stakeholders due to limited of information and awareness.</p> <p>Corrective Action: Giram CU management to complete the RTE Identification and engage with Wildlife Department regarding to RTE Action Plan including responsible measures to resolve human wildlife conflicts Later, the endorsed RTE Actions Plan with HCV Action Plan to be communicated with local communities, smallholders and workers.</p>	<p>Auditor have received evidence of HCV &amp; RTE Action Plan dated 15/06/2022. Sighted the action plan was comprehensive to collaborate with other stakeholders i.e., Lahad Datu Wildlife Department, local communities, etc. Besides that, the action plan has inventories of RTE species, frequently monitoring, location, possibility threaten and responsible measures to resolve human-wildlife conflicts.</p> <p><b>Status: Closed</b></p>

## RSPO PUBLIC SUMMARY REPORT

5.2.1	Minor	<p>Finding: SOU Giram did not consult 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.</p> <p>Objective evidence: Sighted Records of RSPO briefing with interested Smallholders during the Stakeholder meeting dated 13/5/2022 at SOU Giram, however no records of consultations 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.</p>	<p>Root cause: No proper engagement made with smallholders due to limited of information and awareness.</p> <p>Corrective Action: To organize an engagement session with smallholders to enhance their awareness and interest in RSPO certification and conduct activity to support in improving smallholders' livelihood.</p>	<p>Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.</p> <p><b>Status: Open</b></p>
5.2.2	Minor	<p>Finding: SOU Giram did not develop 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).</p> <p>Objective evidence: Sighted Records of RSPO briefing with interested Smallholders during the Stakeholder meeting dated 13/5/2022 at SOU Giram, however no records of development and implementation 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).</p>	<p>Root cause: No proper engagement made with smallholders due to limited of information and awareness.</p> <p>Corrective Action: To organize an engagement session with smallholders to enhance their awareness and interest in RSPO certification and conduct activity to support in improving smallholders' livelihood.</p>	<p>Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.</p> <p><b>Status: Open</b></p>
7.3.1	Minor	<p>Finding: The waste management plans were not effectively implemented.</p> <p>Objective evidence:</p> <ol style="list-style-type: none"> <li>1) Sighted at Mostyn Estate water treatment plant store found that hazardous waste such as Used Chemical sacks (PAC), electrical waste (DB board) and damaged knapsack pump were left unattended.</li> <li>2) Sighted at Giram Estate landfill (Block 2013A) hazardous waste were found dumped inside such as used oil filters, empty paint container and empty lubricant drums.</li> </ol>	<p>Root cause: Implementation of waste management plan was not adequate and not effective Awareness on waste management plan did not reach all workers and lack of enforcement of the plan to ensure all disposal made based on its characteristics.</p> <p>Corrective Action: Refresher training to all workers and management on waste identification and disposal method Hazardous waste found in landfill and water treatment plant to be disposed as scheduled waste.</p>	<p>Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.</p> <p><b>Status: Open</b></p>

# RSPO PUBLIC SUMMARY REPORT

## ATTACHMENT 5

### STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor
2.1.1 RAR 01 2020/ MAR 04 2020	Major	<p><b>Findings:</b></p> <ol style="list-style-type: none"> <li>Occupational Safety &amp; Health (USECHH) Regulation 2000 was not complied with.</li> <li>Unit of certification does not comply with applicable legal requirements i.e Workers Minimum Housing Act 1990 Section 23 (B)</li> </ol> <p><b>Objective evidence :</b></p> <ol style="list-style-type: none"> <li>Recommendation made by CHRA assessor for Water treatment plant (Table D3) to install emergency shower was not complied with.</li> <li>Giram Estate does not comply with Workers Minimum Housing Act 1990 Section 23 (B), linesite inspection did not done weekly which last conducted on 7/2/2020 (Taman Seroja) and at Ulu Balung Div the monsoon drain was found clogged with stagnant water and smelly.</li> </ol>	<p>During site visit at water treatment plant at all units, are equip with emergency shower to address any emergency situation and been tested in operation during the audit.</p> <p>Also reviewed were weekly housing/linesite inspection reports carried out by the EHA/MA, VMO, and persons in charge at all the housings:</p> <p>Giram POM: 5/5/2022, 9/5/2022, 16/5/2022 &amp; 23/5/2022 Giram Estate: 6/5/2022, 13/5/2022, 18/5/2022 &amp; 25/5/2022 Mostyn Estate: 5/5/2022, 11/5/2022, 18/5/2022 &amp; 25/5/2022</p> <p>Visits made during the audit to the workers' housing also confirmed that the houses are in a good state of repair and the surrounding areas are clean. Concreate monsoon drain/parameter design was kept in a good state of repair and no water stagnant were observed. All workers interviewed affirmed the same.</p> <p><b>Status: Closed</b></p>
3.4.3 MZK 01 2020/ MAR 01 2020	Major	<p><b>Findings:</b></p> <ol style="list-style-type: none"> <li>Social management and monitoring plans have not implemented, reviewed and updated in a participatory way.</li> </ol> <p><b>Objective evidence:</b></p> <ol style="list-style-type: none"> <li>For Mostyn Estate, The SIA management and monitoring plans have not implemented and reviewed in a participatory way to update the issue: <ul style="list-style-type: none"> <li>Kg Simpang Ampat: issues regarding Land Survey at Lur Malung Land</li> <li>Kg Seri Bahagia: issues regarding Village main road.</li> <li>Kg Mostyn Lama : issues regarding request of water from KGTI to villagers which is villagers willing to pay</li> </ul> </li> </ol> <p>The SIA also did not updated issues:</p> <ul style="list-style-type: none"> <li>Kg Selamat: regarding Land Title</li> </ul> <p>Based on SIA action plan at GIRAM Mill and GIRAM Estate, the issues of stray dogs was not updated in participatory way.</p>	<p>The Auditor had verified evidence that the Action Plans for each Estate and Mill had been reviewed (annually or earlier), implemented and updated in a participatory way as follows:</p> <p>The Giram Estate: Social Action Plan for FY2021 has been updated on 1/7/2021 ensuing the Stakeholder meeting on June 2021. For FY2022, the SIA action Plan was reviewed in 15/5/2022 after an external stakeholder meeting on 13/5/2022 which had taken into account on the follow up issues regarding stray dogs. Evidence of letter/form of complaints regarding stray dogs had been sent by Giram Estate to the Kunak District Council on 25/2/2020 and 3/3/2022 requesting action to resolve this issue. At the same time, Giram Estate had also taken action to assign APs to monitor the stray dog situation. The strays had also been transferred into the field away from housing areas as a safety precaution.</p> <p>For Giram Palm Oil Mill, the latest SIA Action Plan dated 23/4/2022 had in its agenda discussion on unsafe illegal electrical wiring by workers in their houses and activities of the Gender Committee at the POM.</p> <p>In this audit also, the Auditor had consulted representatives of Kg. Simpang Empat, Kg. Selamat, Kg. Sg Langgas, Kg. Mostyn Lama,</p>

## RSPO PUBLIC SUMMARY REPORT

			<p>Kg Seri Bahagia &amp; Kg Kadazan Kg Cocos who confirmed CU's consultation with local communities. The minutes of stakeholder meetings between SOU Giram with MPKK held on 18/9/2020 and meeting with representative from Kg Kadazan on 3/7/2020; meetings with representatives from Kg Selamat, Kg Langgas, Kg Simpang Ampat, Kg Mostyn Lama &amp; Kg Seri Bahagia on 13/11/2022 were also sighted by the Auditor to confirm discussion/resolution of issues.</p> <p>The issues raised and their resolutions were listed as follows:</p> <p>Kampung Simpang Ampat:</p> <ul style="list-style-type: none"> <li>▪ Village boundary survey by the Land Survey Department. The villagers agree with the appointment of land survey crew from the Department for the task.</li> </ul> <p>Kg Seri Bahagia</p> <ul style="list-style-type: none"> <li>▪ Sighted records of stakeholder meeting 8/9/2020, and consultation by the auditor found that the villagers agree that the main road shall be diverted</li> </ul> <p>Kg Mostyn Lama</p> <ul style="list-style-type: none"> <li>▪ Water request. The issue needed approval from the Top Management HQ and sighted letter dated June 2021 from the villagers acknowledged that they agree to wait for confirmation.</li> <li>▪ Request for security drain/trenches as boundary between village and Estate. The drain has been constructed</li> </ul> <p>Kg Selamat and Kg Kadazan</p> <ul style="list-style-type: none"> <li>▪ Land Title release for Kg Selamat and Kg Kadazan. Sighted letters and records confirmed Sime Darby had agreed to release the Land for both villages. Letters dated 7/6/21 and 23/8/1983 to Land Department Sabah from SOU Giram were verified. A letter of resolve for the issue between CU management and Kg Selamat villagers dated 28hb June 2021 signed by both Parties was available. A letter from Land and Survey Department dated 15/7/2019 to SDSB regarding the Land Title for Kg Kadazan was also sighted.</li> </ul> <p>Giram Estate and POM</p> <ul style="list-style-type: none"> <li>▪ With regards to the Stray Dogs issue, Auditor has sighted the Social Action Plan dated 16/11/2020 and 1/7/2021 regarding stray dogs at both POM and Giram Estate and follow up action taken by management. Letters of request/complaints had been sent to Majlis Daerah Kunak on 25/2/21 and June 2021, however, no response to date. Nevertheless, the management has decided to put the issue in the Plan until 31 December 2021 for resolution.</li> </ul>
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## RSPO PUBLIC SUMMARY REPORT

			<p>Nevertheless, the management has taken own initiative to overcome issue by assigning APs to monitor the stray dogs situation. The strays had also been transferred into the field away from housing areas as a safety precaution.</p> <p>In view of the management actions and resolution of issues mentioned in the 'Social Action Plan' for the Estates and Mill in the CU and upon verification that the Social Management and Monitoring Plans for each Estate and Mill had been implemented, reviewed and updated in a participatory way.</p> <p><b>Status: Closed</b></p>
3.7.1 MAR 02 2020	Major	<p><b>Finding:</b> There were no evidence assessments of training was conducted at GIRAM Mill and GIRAM Estate.</p> <p><b>Objective evidence:</b> Based on training sampled dated 18/8/2020 at GIRAM Mill, 7/8/2020, 10/2/2020 at GIRAM Estate and 13/3/2020 at Mostyn Estate, it was found that no assessment of training was conducted to the employee, in a form they understand.</p>	<p>Formal training programmes for FY 2021/2022 covered all aspects of the RSPO Principles and Criteria. Regular assessments of training needs were presented to auditors by the Giram CU. Assessment of training consistently conducted after training completed were sighted and verified.</p> <p><b>Status: Closed</b></p>
6.1.5 MAR 03 2020	Major	<p><b>Finding:</b> The employees were not aware on the opportunities and improvements for women.</p> <p><b>Objective evidence:</b> Based on interview held with 2 female employees at GIRAM Estate, none of them were aware on the gender committee and awareness on opportunities and improvements for women.</p>	<p>During interview session with sampled female workers at Giram POM, Giram Estate and Mostyn Estate, it was found that the female workers were aware of the function of gender committee on their welfare including the opportunities and improvements for women as discussed during Gender Committee series meeting in year 2022.</p> <p><b>Status: Closed</b></p>
2.1.3 RAR 02 2020	Minor	<p><b>Finding:</b> Legal authorized boundaries were not clearly demarcated and visibly maintained.</p> <p><b>Objective evidence:</b></p> <ul style="list-style-type: none"> <li>At Giram Estate (Ulu Balung Division) boundaries between estate and Ulu Kalumpang Reserve Forest was not clearly demarcated and maintained.</li> </ul> <p>At Mostyn Estate boundaries between smallholder at Block 09B was not clearly demarcated and maintained.</p>	<p>On site verification during this audit, found sampled boundaries between Giram estate and Ulu Kalumpang Reserve Forest (FMU 27) was clearly demarcated and maintained with adequate signages; also the boundary between Block 09b, Mostyn estate and smallholder Lim Boon Sen was found clearly painted with signboards. A drain was also dug to represent the boundary between the estate and the smallholder</p> <p>The boundary stone 325/30 marking Giram Estate boundary with the Forest Reserve was also sighted in the field. Based on the evidence verified.</p> <p><b>Status: Closed</b></p>

## RSPO PUBLIC SUMMARY REPORT

<p>3.3.2 RAR 03 2020</p>	<p>Minor</p>	<p><b>Finding:</b> The procedure mentioned as follows was not effectively implemented.</p> <ul style="list-style-type: none"> <li>Operational Control Procedure, - Title Personal Protective Equipment, Document no.: SD/SDP/PSQM(ESH)/201-OS16.</li> <li>SOP EQMS- HIRARDC Procedure- no 7.3 - Risk assessments (b) probability of an occurrence</li> </ul> <p><b>Objective evidence:</b></p> <ul style="list-style-type: none"> <li>During interview at Giram Estate (Ulu Balung Division) with general workers. PPE (rubber boot) has been provided to them once only and also no record of PPE issuance record for all of them.</li> <li>Risk assessments for activities Harvesting – walking palm to palm - Probability of an occurrence value has not been increase to value 4 for repeated case.</li> </ul>	<p>Records of PPE issued and acknowledgement of receipt are maintained individually for all category of workers at mill and estates. Sighted common PPE issued included face masks respirators, goggles, safety shoes, harvesting shoes, rubber boots, nitrile/cotton gloves, apron and hard hat. In addition to basic PPE, special PPE are also provided for workers assigned to dangerous operation such as work at height and in confined space. All workers were provided with appropriate PPE where the cost are bared by the management. Interviews conducted during the site visit at the Mill and both estates showed understanding and approval from the workers that the management bares the cost of all PPEs and the workers are entitled to valid PPE, the importance of using required PPE at all times during work and proper storage and disposal methods of PPE. Additionally, both estates updated the HIRARC with details in 3.6.1.</p> <p><b>Status: Closed</b></p>
<p>4.3.1 MZK 04 2020</p>	<p>Minor</p>	<p><b>Finding:</b> Contributions to community was not based on the results of consultation with local communities.</p> <p><b>Objective evidence:</b> Mostyn Estate: there are records of CSR to the school and government agencies, however, during interviewed with local communities surrounding the Estate from Kg Sri Bahagia, Kg Simpang Ampat, Kg Sg Langgar, Kg Mostyn Lama and Kg Selamat there are no explanations to them regarding Contributions to community development.</p>	<p>In this audit, the Estate management has identified and conduct a targeted meeting with each village representative to discuss contributions required. The meeting held was as follows: 18/9/2020 – Meeting with representative from Kg Mostyn Lama &amp; Kg Seri Bahagia 4/11/2020 – Meeting with representative from Kg. Simpang Empat, Kg. Selamat &amp; Kg Sg Langgas</p> <p>Sighted records also showed CSR contribution had been implemented for 2022 and 2021 to local communities. 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 which is the main Contributions to community development. At Mostyn Estate, there are records of CSR to the school and government agencies</p> <p>Interviewed Head of Kg. Simpang Empat, Kg. Selamat, Kg Sg Langgas, Kg Mostyn Lama, Kg Seri Bahagia &amp; Kg Kadazan Kg Cocos by the Auditor during the audit, confirmed that they had been explained by the CU on CSR contribution relevant to sustainable development during the stakeholder meetings above, the latest being held on 13/5/2022.</p> <p><b>Status: Closed</b></p>

## RSPO PUBLIC SUMMARY REPORT

### ATTACHMENT 6 – Timebound Plan

#### SDP - RSPO Certification for Time Bound Plan - Malaysia Operations (as at April 2021)

No	Management Unit (SOU Name)	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
1	Sg. Dingin	Sungai Dingin Oil Mill	-	Karangan, Kedah	Certified	12-Aug-10	
		Anak Kulim Estate	-		Certified		
		Sungai Dingin Estate	-		Certified		
		Somme Estate	-		Certified		
		Bukit Selarong Estate	-		Certified		
		Padang Buluh Estate	-		Certified		
		Bukit Hijau Estate	-		Certified		
		Jentayu Estate	-		Certified		
2	Chersonese	Chersonese Oil Mill	-	Kuala Kurau, Perak	Certified	5-Oct-11	
		Chersonese Estate	-		Certified		
		Kalumpong Estate	-		Certified		
		Tali Ayer Estate	-		Certified		
		Holyrood Estate	-		Certified		
3	Elphil	Elphil Oil Mill	-	Sg Siput, Perak	Certified	18-Jun-11	
		Kamuning Estate	-		Certified		
		Elphil Estate	-		Certified		
		Kinta Kellas Estate	-		Certified		
4	Flemington	Flemington Oil Mill	-	Teluk Intan, Perak	Certified	5-Oct-11	
		Flemington Estate	-		Certified		
		Bagan Datoh Estate	-		Certified		
		Sabak Bernam Estate	-		Certified		
		Sg. Samak Estate	-		Certified		



## RSPO PUBLIC SUMMARY REPORT

5	Seri Intan/Selaba	Seri Intan Oil Mill	-	Teluk Intan, Perak	Certified	3-Mar-11	
		Selaba Oil Mill	-		Certified		
		Seri Intan (+ Selaba) Estate	-		Certified		
		Sabrang Estate	-		Certified		
		Sogomana Estate	-		Certified		
		Sg. Wangi Estate	-		Certified		
		Bikam Estate	-		Certified		
		Cluny (+ Bedford) Estate	-		Certified		
6	Tennamaram	Tennamaram Oil Mill	-	Bestari Jaya, Selangor	Certified	3-Mar-11	
		Tennamaram Estate	-		Certified		
		Sungai Buluh Estate	-		Certified		
		Bukit Talang Estate	-		Certified		
7	Bkt Kerayong	Bukit Kerayong Oil Mill	-	Kapar, Selangor	Certified	15-Apr-11	
		Bukit Kerayong Estate	-		Certified		
		Bukit Cheraka Estate	-		Certified		
8	East	East Oil Mill	-	Carey Island, Selangor	Certified	19-May-10	
		East Estate	-		Certified		
		Sepang Estate			Certified		
		Dusun Durian Estate	-		Certified		
9	West	West Oil Mill	-	Carey Island, Selangor	Certified	19-May-10	
		West Estate	-		Certified		
10	Bukit Puteri	Bukit Puteri Oil Mill	-	Raub, Pahang	Certified	7-Jul-11	
		Bukit Puteri Estate	-		Certified		
11	Kerdau	Kerdau Oil Mill	-	Temerloh, Pahang	Certified	7-Jul-11	Jentar Estate has merged with Kerdau Estate and reported to the CB in March/April 2021.
		Kerdau Estate	-		Certified		
		Mentakab Estate	-		Certified		
		Chenor Estate	-		Certified		
		Sg Mai Estate	-		Certified		

## RSPO PUBLIC SUMMARY REPORT

12	Jabor	Jabor Oil Mill	-	Kuantan, Pahang	Certified	7-Jul-11	
		Jabor Estate	-		Certified		
13	Labu	Labu Oil Mill	-	Nilai, Negeri Sembilan	Certified	30-Dec-11	New Labu Estate has become a division of Labu Estate.
		Labu Estate	-		Certified		
14	Tanah Merah	Tanah Merah Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	19-May-10	
		Tanah Merah Estate	-		Certified		
		Bukit Pelandok Estate	-		Certified		
15	Sua Betong	Sua Betong Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	18-Feb-14	Siliau Estate has now been merged into Salak Estate and Bradwall Estate.
		Sua Betong Estate	-		Certified		
		Sengkang Estate	-		Certified		
		Bradwall Estate	-		Certified		
		PD Lukut Estate	-		Certified		
		Tampin Linggi Estate	-		Certified		
		Sg. Bahru Estate	-		Certified		
		Salak Estate	-		Certified		
16	Kok Foh	Kok Foh Oil Mill	-	Bahau, Negeri Sembilan	Certified	7-Jul-11	Sg. Gemas Estate has now been merged into Sg Senarut Estate
		Muar River Estate	-		Certified		
		Sg. Senarut Estate + Sg Gemas Estate	-		Certified		
		Kok Foh Estate	-		Certified		
		Bukit Pilah Estate	-		Certified		
		St. Helier Estate	-		Certified		
		Sungai Sabaling Estate	-		Certified		
		Pertang Estate	-		Certified		
17	Kempas	Kempas Oil Mill	-	Jasin, Melaka	Certified	20-May-10	Serkam Estate, previously from SOU18 (Diamond Jubilee) is now part of SOU 17 (Kempas)
		Kempas Estate	-		Certified		
		Tangkah Estate	-		Certified		
		Kemuning Estate	-		Certified		
		Serkam Estate	-		Certified		
18	Diamond	Diamond Jubilee Palm	-	Jasin, Melaka	Certified	5-Oct-11	Serkam Estate, previously from

# RSPO PUBLIC SUMMARY REPORT

	Jubilee	Oil Mill					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)
		Diamond Jubilee Estate	-		Certified		
		Bukit Asahan Estate	-		Certified		
		Welch Estate	-		Certified		
19	Pagoh	Pagoh Oil Mill	-	Muar, Johor	Certified	28-Jan-14	
		Pagoh Estate	-		Certified		
		Lanadron Estate	-		Certified		
		Pengkalan Bukit Estate	-		Certified		
20	Chaah	Chaah Oil Mill	-	Chaah, Johor	Certified	18-Nov-10	
		Chaah Estate	-		Certified		
		Sg. Simpang Kiri Estate	-		Certified		
		North Labis Estate	-		Certified		
21	Gunung Mas	Gunung Mas Oil Mill	-	Kluang, Johor	Certified	19-May-10	* SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bk Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018.
		Gunung Mas Estate	-		Certified		
		Kempas Klebang Estate	-		Certified		
		Bukit Paloh Estate	-		Certified		
		Yong Peng Estate	-		Certified		
22	Bukit Benut	Bukit Benut Oil Mill	-	Kluang, Johor	Certified	5-Oct-11	* SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO. Certification Scope of SOU Bk Benut in 2018.
		Bukit Benut Estate	-		Certified		
		Lambak Elaeis Estate	-		Certified		
		CEP Nyior Estate	-		Certified		
23	Ulu Remis	Ulu Remis Oil Mill	-	Layang-layang, Johor	Certified	11-Apr-11	
		Ulu Remis Estate	-		Certified		
		Cenas Estate	-		Certified		
		Bukit Badak Estate	-		Certified		
		Tun Dr. Ismail Estate	-		Certified		
		Pekan Estate	-		Certified		
		Sembrong Estate	-		Certified		

# RSPO PUBLIC SUMMARY REPORT

24	Hadapan	Hadapan Oil Mill	-	Layang-layang, Johor	Certified	29-Mar-11	
		Sri Pulau Estate	-		Certified		
		Kulai Estate	-		Certified		
		Layang Estate	-		Certified		
		CEP Renggam Estate	-		Certified		
26	Sandakan Bay	Sandakan Bay Oil Mill	-	Sandakan, Sabah	Certified	1-Oct-08	
		Tun Tan Siew Sin Estate	-		Certified		
		Tunku Estate	-		Certified		
		Tigowis Estate	-		Certified		
		Sentosa Estate	-		Certified		
		Segaliud Estate	-		Certified		
27	Melalap	Melalap Oil Mill	-	Tenom, Sabah	Certified	21-Jan-11	
		Melalap Estate	-		Certified		
		Sapong Estate	-		Certified		
28	Binuang	Binuang Oil Mill	-	Kunak, Sabah	Certified	16-Jan-09	
		Binuang Estate	-		Certified		
		Sungang Estate	-		Certified		
		Tingkayu Estate	-		Certified		
		Jeleta Bumi Estate	-		Certified		
29	Giram	Giram Oil Mill	-	Kunak Sabah	Certified	16-Jan-09	
		Giram Estate	-		Certified		
		Mostyn Estate	-		Certified		
30	Merotai	Merotai Oil Mill	-	Tawau, Sabah	Certified	16-Jan-09	
		Merotai Estate	-		Certified		
		Imam Estate	-		Certified		
		Tiger Estate	-		Certified		
		Table Estate	-		Certified		
31	Lavang	Lavang Oil Mill	-	Bintulu, Sarawak	Certified	30-Dec-11	
		Lavang Estate	-		Certified		
		Rasan Estate	-		Certified		

## RSPO PUBLIC SUMMARY REPORT

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

## RSPO PUBLIC SUMMARY REPORT

### SDP - RSPO Certification for Time Bound Plan - Indonesia Operations (as of January 2022)

No	Management Unit (SOU Name)	Mill and Supply Base	Time Bound Plan	Latest Internal / External Audit Date	Location	Status	Certified Date	Remarks (for uncertified unit)
1	PT Lahan Tani Sakti	Alur Dumai Mill	-		Rokan Hilir District – Riau	Certified	16-Jan-12	
		Alur Dumai Estate	-			Certified		
2	PT Sajang Heulang	Mustika Mill	-		Tanah Bumbu District – South Kalimantan	Certified	3-Jul-13	
		Mustika Estate	-			Certified	3-Jul-13	
		Pantai Bonati Estate	-			Certified	6-Jul-11	
3	PT Ladangrumpun Suburabadi	Angsana Mill	-		Tanah Bumbu District – South Kalimantan	Certified	6-Jul-11	
		Angsana Estate	-			Certified		
		Gunung Sari Estate	-			Certified		
4	PT Langgeng Muaramakmur	Bebunga Mill	-		Kotabaru District – South Kalimantan	Certified	16-Mar-12	
		Bebunga Estate	-			Certified		
		Sungai Cengal Estate	-			Certified		
		Bakau Estate	-			Certified		
5	PT Kridatama Lancar	Sukamandang Mill	-		Seruyan and East Kotawaringin District – Central Kalimantan	Certified	5-Jul-11	
		Sukamandang Estate	-			Certified		
		Sapiri Estate	-			Certified		
		Barasdanum Estate	-			Certified		
		Kuala Kuayan Estate	-			Certified		
6	PT Bahari Gembira Ria	Ladang Panjang Mill	-		Muaro Jambi District - Jambi	Certified	9-Jul-12	Only Division 3 is certified (1,202 Ha). Total Areas of Division 1 and 2 (1,796.19 ha) HGU still in process.
		Ladang Panjang Estate	-			Certified	9-Jul-12	

# RSPO PUBLIC SUMMARY REPORT

7	PT Tunggal Mitra Plantations	Manggala Mill	-		Rokan Hilir District – Riau	Certified	25-Nov-10	
		Manggala 1 Estate	-			Certified		
		Manggala 2 Estate	-			Certified		
		Manggala 3 Estate	-			Certified		
8	PT Paripurna Swakarsa	Pondok Labu Mill	-		Kotabaru District – South Kalimantan	Certified	16-Mar-12	
		Pondok Labu Estate	-			Certified		
		Binturung Estate	-			Certified		
		Rampa Estate	-			Certified		
		Sesulung Estate	-			Certified		
9	PT Bersama Sejahtera Sakti	Gunung Aru Mill	-		Kotabaru District – South Kalimantan	Certified	5-Jul-11	
		Gunung Aru Estate	-			Certified		
		Gunung Kemas Estate	-			Certified		
		Laut Timur Estate	-			Certified		
		Pantai Timur Estate	-			Certified		
10	PT Guthrie ecconina	Rantau Panjang Mill	-		Musi Banyuasin District – South Sumatera	Certified	16-Mar-12	890.98 ha – Still under land Legalization process. Sg. Jernih Estate and KKPA Was separated in 2022.
		Rantau Panjang Estate	-			Certified		
		Bumi Ayu Estate	-			Certified		
		Karang Ringin Estate	-			Certified		
		Napal Estate	-			Certified		
		Mangun Jaya Estate	-			Certified		
		Sungai Jernih Estate	2023			Non-Certified		

## RSPO PUBLIC SUMMARY REPORT

11	PT Laguna Mandiri	Rantau Mill	-		Kotabaru District – South Kalimantan	Certified	30-Dec-11	
		Rantau Estate	-			Certified		
		Matalok Estate	-			Certified		
		Betung Mill	-			Certified	1-Apr-14	
		Betung Estate	-			Certified		
		Sekayu Estate	-			Certified		

12	PT Indotruba Tengah	Sekunyir Mill	-		Seruyan and West Kotawaringin District – Central Kalimantan	Certified	23-Nov-10	
		Sekunyir	-			Certified		
		Seruyan Estate	-			Certified		

13	PT Swadaya Andika	Selabak Mill	-		Kotabaru District – South Kalimantan	Certified	16-Mar-12	Mill was closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification.
		Selabak Estate	-			Certified		
		Randi Estate	-			Certified		
		Sangkoh Estate	-			Certified		
		Lanting Estate				Certified		

14	PT Bina Sains Cemerlang	Sungai Pinang Mill	-		Musi Rawas District – South Sumatera	Certified	11-Sep-12	Land legalisation process for 308.35 ha is still in process.
		Sungai Pinang Estate	2023			Non-Certified		
		Bukit Pinang Estate	2023			Non-Certified		



# RSPO PUBLIC SUMMARY REPORT

15	PT Teguh Sempurna	Pematang Mill	-		Seruyan and East Kotawaringin District – Central Kalimantan	Certified	5-Jul-11	
		Pematang Estate	-			Certified		
		Kawan Batu Estate	-			Certified		
		Hatan Tiring Estate	-			Certified		
		Batang Garing Estate	-			Certified		
16	PT Bhumireksa Nusa Sejati	Teluk Bakau Mill	-		Indra Giri Hilir District – Riau	Certified	11-Oct-11	
		Teluk Bakau Estate	-			Certified		
		Nusa Lestari Estate	-			Certified		
		Nusa Perkasa Estate	-			Certified	1-Apr-14	
		Mandah Mill	-			Certified		
		Mandah Estate	-			Certified		
		Rotan Semelur Estate	-			Certified		
17	PT Aneka Intipersada	Teluk Siak Mill	-		Pekanbaru, Siak District – Riau	Certified	11-Oct-11	
		Teluk Siak Estate	-			Certified		
		Pinang Sebatang Estate	-			Certified		
		Aneka Persada Estate	-			Certified		
18	PT Tamaco Graha Krida	Ungkaya Mill	-		Morowali District – Sulawesi Tengah	Certified	10-Jul-12	
		Ungkaya Estate	-			Certified		
19	PT SIME Indo Agro	Bukit Ajong Mill	-		Sanggau District –West Kalimantan	Certified	18-Oct-10	Land legalisation process for East Est for 5,815.64 ha is still in process.
		West Estate	-			Certified		
		East Estate	-			Certified		
		East* Estate /Sei Mawang Estate	2023			Non-Certified		

# RSPO PUBLIC SUMMARY REPORT

20	PT Padang Palma Permai / PT Perkasa Subur Sakti/ PT Perkebunan Industri & Niaga Sri Kuala	Blang Simpo Mill	-		Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam	Certified	3-May-13	Land legalisation process for KKPA PT PPP – Land Permit is still in process.
		Tamiang (PT PPP) Estate	-			Certified		
		Batang Ara (PT PSK) Estate	-			Certified		
		Blang Simpo-01 Estate	-			Certified		
		Blang Simpo-02 Estate	-			Certified		
21	PT Sandika Natapalma	Lembiru Mill	-		Ketapang District – West Kalimantan	Certified	3-Jul-14	PT Sandika Natapalma and PT Budidaya Agro Lestari estates are supplying to one mill i.e. Lembiru Mill (PT SNP).
		Lembiru Estate	-			Certified		
		Awatan Estate	-			Certified		
		Karya Palma Estate	2023			Non-Certified		Pending confirmation from BPN on HGU Document.
22	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Estate	-		Ketapang District – West Kalimantan	Certified	3-Jul-19	HGU obtained as per May 2018. However never been released by BPN.
		Beturus (PT BAL) Estate	2023			Non-Certified		
23	PT Mitral Austral Sejahtera	<b>MAS Mill</b>	NA	NA	Sanggau District – West Kalimantan	NA	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.
		MAS 1 Estate	NA	NA		NA		
		MAS 2 Estate	NA	NA		NA		
		MAS 4 Estate	NA	NA		NA		
		Plasma MAS Estate	NA	NA		NA		

## RSPO PUBLIC SUMMARY REPORT

### SDP - RSPO Certification for Time Bound Plan – New Britain Palm Oil (NBPOL) Operations (as at March 2021)

No	Management Unit (SOU Name)	Supply Base	Time Bound Plan	Location	Status	Certified Date
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	NA	Guadalcanal Province, Solomon Islands	Certified	18-Mar-11
		Tetere Estate				
		Ngalimbiu Estate				
		Mbalisuna Estate				
		Smallholders – West Zone (83)				
		Smallholders – Central Zone (53)				
		Smallholders – MBA East Zone (59)				
2	Milne Bay Estates (MBE)	Smallholders – MBE East Zone (37)	NA	Milne Bay Province, Papua New Guinea	Certified	15-Feb-13
		Hagita Oil Mill				
		Giligili Estate				
		Hagita Estate				
		Waigani Estate				
		Sagarai Estate				
		Padipadi Estate				
		Mariawatte Estate				
		Smallholders - East Gurney Estate (259)				
		Smallholders - West Gurney Estate (231)				
		Smallholders - East Sagarai Estate (156)				
		Smallholders - West Sagarai Estate (212)				

# RSPO PUBLIC SUMMARY REPORT

3	Poliamba (POL)	Poliamba Oil Mill		New Ireland Province, Papua New Guinea	Certified	19-Mar-12
		Kara Estate				
		Nalik Estate				
		West Coast Estate				
		Noatsi Estate				
		Madak Estate				
		Smallholders -North Division (615)				
		Smallholders- South Division (866)				
		Smallholders -West Division (309)				
4	Ramu Agricultural Industries Ltd (RAIL)	Gusap Mill	NA	Morobe Province, Papua New Guinea	Certified	5-Aug-10
		Gusap East (Gusap) Estate				
		Gusap West (Paddox) Estate				
		Surinam Estate				
		Dumpu Estate				
		Ngaru Estate				
		J Estate (Jephcott) Estate				
		Smallholders - Madang VOPs (71)				
		Smallholders - Morobe VOPs (253)				

# RSPO PUBLIC SUMMARY REPORT

No	Management Unit (SOU Name)	Supply Base	Time Bound Plan	Location	Status	Certified Date
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	NA	Oro Bay Province, Papua New Guinea	Certified	1-Feb-13
		Mamba Oil Mill				
		Embi Estate				
		Ambogo Estate				
		Sangara Estate				
		Sumbiripa Estate				
		Mamba Estate				
		Sambogo Estate				
		Scheme Smallholder Sorovi Division(2019)				
		Scheme Smallholder Saiho Division(842)				
		Scheme Smallholder Aeka Division (911)				
		Scheme Smallholder Igora Division (1367)				
		Scheme Smallholder Ilimo Division (671)				
6	West New Britain (WNB)	Mosa Oil Mill	NA	Kimbe, West New Britain, Papua New Guinea	Certified	10-Sep-08
		Kumbango Oil Mill				
		Kapiura Mill				
		Numundo Mill				
		Waraston Mill				
		Bebere Estate				
		Kumbango Estate				
		Togulo Estate				
		Dami Estate				
		Waisisi Estate				
		Kautu Estate				

# RSPO PUBLIC SUMMARY REPORT

No	Management Unit (SOU Name)	Supply Base	Time Bound Plan	Location	Status	Certified Date
7		Karaisu Estate				
		Moroa Estate				
		Bilomi Estate				
		Loata Estate				
		Haella Estate				
		Garu Estate				
		Daliavu Estate				
		Sapuri Estate				
		Malilimi Estate				
		Rigula Estate				
		Nomundo Estate				
		Navarai / Karato ME /KDC EU Estate				
		Volupai / Lotomgam / Natupi / Goruru Estate				
		Lolokoru Estate				
		Ove Estate				
		Tamare Estate				
		Smallholders LSS Mosa (1822)				
		Smallholders VOP East (1817)				
		Smallholders VOP Central (1964)				
		Smallholders VOP West (1279)				
		Smallholders LSS Kapiura (551)				
		Smallholders VOP Kapiura (850)				
		Smallholders Kaulong/Akami/Pushiki/Repamira/Sakapei (20)				
	Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Erap Mill	Sep-20	Markham Farms	Certified	Certified on 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.
		Munum Estate	Sep-20		Certified	
		Maralumi Estate	Sep-20		Certified	
		Erap Estate	Sep-20		Certified	

## RSPO PUBLIC SUMMARY REPORT

### 4) SDP - RSPO Certification for Time Bound Plan – Liberia Operations (as at January 2020)

No	Management Unit (SOU Name)	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
1	Sime Darby Plantation (Liberia) Grand Cape Mount	Grand Cape Mount Mill	Not Applicable - Property disposed	Grand Cape Mount County	Not yet Certified	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). <a href="http://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations">http://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations</a>
		Bomi Estate					
		Lofa Estate					
		Matambo Estate					
		Grand Cape Mount Estate					