

SIRIM QAS INTERNATIONAL SDN. BHD.

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

RSPO PUBLIC SUMMARY REPORT

File Ref.: ES10170017

CLIENT: SIME DARBY PLANTATION BERHAD -SOU 30 MEROTAI

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	Mill and Supply	GPS Location		Location
Unit	Base	Latitude	Longitude	Location
MEDOTAL	Merotai POM	4º 23'N	117º 83' E	91007, Tawau, Sabah
MEROTAI Strategic Operating Unit (SOU 30)	Merotai Estate	4° 23'N	117º 47' E	91007, Tawau, Sabah
	Tiger Estate	4º 25'N	117º 50' E	91007, Tawau, Sabah
	Table Estate	4º 22'N	117º 52' E	91007, Tawau, Sabah
(33300)	Imam Estate	4º 20'N	117º 50' E	91007, Tawau, Sabah

MAP : See Attach	nment 1								
AUDIT DATE :	13-17 June 2022	DURATION : 30 Auditor days							
TYPE OF AUDIT	: Annual Surveillance 1 & 2	e Audit No. Recertification Audit							
STANDARD: MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018									
	SCOPE OF CERTIFICATION: Production of Sustainable Crude Palm Oil and Palm Kernel Using Mass Balance Supply Chain Model								
VALIDITY OF RS	SPO CERTIFICATE: 13 July 2020	– 12 July 2025							
The following at Non-conformity R	tachments form part of this report (s)	t: List of additional site(s)							
Report by Audit	Team Leader	Acknowledgement by Client's Representative							
Name :	SIME DARBY PLANTATION (SABAH) SDN. BHD.								
Signature :	Signature Signature MUHAMAD ASRAF BIN KAMALUDIN								
Date :	26/9/2022	Date : 06/09/2023							

SUMMARY OF AUDITS

	Recertification Audit 2							
On-site audit date	:	10 – 14 August 20		No. of auditor days:	22 Auditor Days			
Remote audit date	:	20 – 23 April 2020						
Audit team	:), Mohd Ab Raouf bin Asi ari (remote team member)				
No. of major NCR	:	1 Indicate	or: 2.1.1		Closing date: 6/11/2020			
No. of minor NCR	:	0 Indicate	or : -					
Indicate the stakeholders	:	Employees	Settlers	Villagers / Local communities	Suppliers			
interviewed during the		$\sqrt{}$	N/A	$\sqrt{}$	$\sqrt{}$			
on-site audit		Contract workers	NGOs	Govt. agency	Independent growers			
		$\sqrt{}$						
		Indigenous people	Contractor	Others (Please specify)				
		N/A	V					
Supply base sampled	:	Merotai Estate, Ti	ger Estate, Imam Es	state and Table Estate				
Justification of audit planning		Mill = 3 days (1 days) for safety and he Certification). Merotai Estate, Ti of safety and hea	ealth, environment, ger Estate, Imam Es th, environment, go be verification of Lan	r for supply chain certifica mill best practices, GHG state and Table Estate = \$	ation systems and 1.5 days a verification, TBP, Partial 3 days each for verification ces, Social, HCV and GHG			
Changes since the last audit	:	No changes						
Report approved by		Kamini Sooriamoo	orthy	Date: 24/11/2020)			

			Annual	Surveillance Aud	it 1	
On-site audit date	:	12 – 14	July 2021		No. of auditor days:	6
(remote)			,		•	
Audit team	:	Rozaime	e Ab Rahm	nan, Mohd Zulfakar	Kamaruzaman	
No. of major NCR	:	Ni	Indicator			Closing date : -
No. of minor NCR	:	Nil	Indicator	:		
Indicate by ticking the stakeholders interviewed	:	Employees		Settlers	Villagers / Local communities	Suppliers
during the on-site audit						
		Contract	workers	NGOs	Govt. agency	Independent growers
		Indigenou	ıs people	Contractors	Others (Please specif	y)
Supply base sampled	:			te, Tiger Estate, Ta	ble Estate and Imam Es	state
Changes since the last	:	No chang	jes			
audit						
Justification of audit planning	:	Remote audit				
Report approved by	:	Kamini S	ooriamoort	thy	Approval date: -	·

			Annual S	urveillance Audit 1	1 & 2	
On-site audit date	:	13-17 June 2022			No. of auditor days:	30 Auditor Days
Audit team	:	Trainee Lead Auditor - Rohazimi Mat Nawi				
		Auditor: N	Nohd Ab R	aouf Asis, Dzulfiqar	Azmi, Mohd Zulfakar k	Kamaruzaman, Amir
		,	lohd Nordii			
No. of major NCR	:	2	Indicator:	3.8.7 & 7.8.2		Closing date: 16/09/2022
No. of minor NCR	:	2	Indicator	: 5.2.1 & 5.2.2		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Settlers Workers organizations		Settlers	Villagers / Local communities	Suppliers
		/			1	/
		Contract workers		Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
		/	/			
		Indigenous people		Contractor	Others (Please specif	y)
				/		
Supply base sampled	:			er Estate, Imam Est	ate and Table Estate	
Changes since the last audit	:	No chang	je			
Justification of audit	:			uditor days for Merc		
planning		Mill = 6 days (3 day for social, 1 day for supply chain certification systems and 2 day				
		for safety and health, environment, mill best practices, GHG verification, TBP, Partia Certification).				
		Merotai Estate, Tiger Estate, Imam Estate and Table Estate = 6 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.				
Name of peer reviewer	:	-				
Report approved by	:	Kamini S	ooriamoort	hy	Approval date :	26/09/2022

SUMMARY OF INFORMATION

TABLE 1

		IADE	- ·			
	RA	ASA 1	ASA 2	ASA 3	ASA 4	
Projection Period	*Aug 2020 – July 2021	*Aug 2021 – May 2022	June 2022 – May 2023			
Certified FFB Processed (MT)	211,166.48	104,788.99	187,655.00			
Production of Certified CPO (MT)	51,148.52	22,332.28	41,940.90			
Production of Certified PK (MT)	11,202.88	5,077.58	9,082.50			
Certified Areas (Ha)	11,545.71	11,545.71	11,545.71			
Planted Areas (Ha)	10,337.20	10,337.20	10,337.20			
Production Areas (Ha)	8,854.54	8,854.54	8,854.54			
HCV Areas / Conservation Areas (Ha)	161.23	161.23	161.23			
REMARKS	*Actual period covered during this reporting period was Aug 2020 to May 2022.					

TABLE 2

	PO	PK
Last years certified volume (MT) – Aug 2020 to May 2022	**63,906.86	**14,158.52
Last years actual certified sold (MT) – Aug 2020 to May 2022	4,439.56	13,445.45
Last years actual sold under other schemes (MT) – Aug 2020 to May 2022	0.00	0.00
Last years sold conventional (MT) – Aug 2020 to May 2022	36,160.95	713.06
New year certified volume (MT) – June 2022 to May 2023	41,940.90	9,082.50

^{**}Palm Trace extension carried out in March 2022, with the total of approved amount of CPO (12,758.34MT) and PK (2,955.68MT)

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1.0 AUDIT PROCESS

1.1 Certification Body

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

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Rohazimi Bin Mat Nawi	Trainee Lead Auditor Enviroment, Safety, Metric Template	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
Mohd Ab Raouf Asis	Auditor Social, GAP	Holds a B.Sc. in Manufacturing (Production and Operation). He had more than 7 years of working experience in the oil palm operation. Currently he qualified as Lead Auditor for RSPO P&C and MSPO Certification.
Mohd Zulfakar Kamaruzaman	Auditor Social – External, HCV	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C, RSPO Supply Chain and MSPO Certification.
Dzulfiqar Azmi	Auditor Enviroment, GHG & TBP	Holds a B. Sc. in Agriculture from University Teknologi Mara (UiTM). He had more than 5 years of working experience in the oil palm operation and experience in auditing since 2017. He was successfully attended Integrated Management System lead assessor course in 2017.
Mohd Nordin Ab Jalil	Auditor GAP	Holds a B. Sc. in Agriculture from Universiti Pertanian Malaysia. He has over 35 years working experience in the oil palm plantation operation. He is qualified auditor for RSPO P&C.

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1.3 Audit methodology

The audit covered Merotai palm oil mill and 4 of its supply bases, namely Merotai Estate, Table Estate, Imam Estate and Tiger Estate. The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

SIRIM QAS International had initiated the stakeholder consultation by 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)	 Workers: a. Workers work 6 days a week with one rest day (Sunday). They work 8 hours with a minimum of 30 minutes' break in between. b. All workers sampled confirmed that they receive their salaries before 7th of every month. As of the date of this audit, all of sampled workers understood on Minimum Wages. c. Any overtime work is mutually agreed between workers and management, and that there is no element of forcing. d. Foreign workers are not subjected to any recruitment fee. Foreign workers who choose to keep their passports at the office have done so with their written consent. e. Workers are generally satisfied with the way complaints lodged are acted upon. Delays in house repairs, if any, are usually due to the need to order repair parts. f. Workers, including foreign workers get to appoint their own representatives. There is no interference of influence exerted by the employer. g. For newly arrived, foreign workers who do understand Bahasa or English, translations are provided during briefings.
Settlers Villagers / Local communities (including women representatives, displaced communities)	Not applicable Generally, the villagers have no issue. This has been based on interviews made with the representatives from Kg Sungai Imam, Kg Pengkalan Bombalai, Kg Seri Bombalai, Kg Nipah Bombalai Kampung Simpang Tiga, Kg Gudang 4, Kg Pitas, Kg Karito and Kg. Hj. Matahir.
4) Suppliers	No issue raised. Payments are received in time.
5) Contract workers	At time of visit there were no contract workers.
6) Local & national NGOs	Not available for this audit.
7) Government agencies / Statutory bodies	No complaints received.
8) Independent growers / Smallholders	No complaints. Fair & timely payments for FFB supplied.
9) Indigenous people	Not applicable
10) Contractor	No issue. Contracts are fair and payments are promptly received within less than one month.
11) Previous land owner (if any)	Not applicable.
12) Others (please specify)	Not applicable

1.5 Audit plan: Refer to Attachment 2

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 Merotai Certification Unit (Merotai CU) is one of the Strategic Operating Unit (SOU) of Sime Darby Plantation Berhad (SDPB). Located in Tawau, Sabah, East Malaysia, the CU is also known as SOU 30. The CU was initially certified to the RSPO P&C by SIRIM QAS International Sdn Bhd in 2009 until 2014. However, since the renewal was not carried out prior to the expiry of the certificate, a new stage 2 was carried out in 2015 and was later certified again on 13 July 2015.

The Merotai CU comprises of the Merotai Palm Oil Mill (Merotai POM) and four supply bases i.e. Merotai Estate, Tiger Estate, Table Estate and Imam Estate. All the estates are owned by SDPB and were fully developed, hence, the principle 7 of the RSPO Principles & Criteria is not applicable. Merotai POM has a milling capacity of 90 mt/hr.

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 Merotai Palm Oil Mill were as follow:

<u>Table 1: Actual FFB production by the supply base for the period from</u>
<u>August 2020 to July 2021 & August 2021 to May 2022</u>

	FFB Production (Aug. 2020 to Jul. 2021)		FFB Production (Aug. 2021 to May 2022)			
Supply Based	Total Mt	Percentag e (%)	Total Mt	Percentage (%)	Certifying CB	
Merotai Estate	58,137.50	24.56	37,698.87	23.35	SIRIM	
Tiger Estate	38,155.04	16.12	19,298.41	11.87	SIRIM	
Imam Estate	50,792.91	21.46	34,882.92	21.76	SIRIM	
Table Estate	21,873.06	9.24	12,908.79	8.12	SIRIM	
Total	168,958.31	100	104,788.99	68.10		
3 rd Party OCP	67,756.46	28.62	56,561.96	31.90	Non-certified	
Grand Total	236,714.97	100	161,350.95	100		

Table 2: Projected FFB production by the supply base for the next reporting period

June 2022 to May 2023

Supply Paged	FFB C	Contribution	Contifuing CP	
Supply Based	Total Mt	Percentage (%)	Certifying CB	
Merotai Estate	66,112	23.31	SIRIM	
Tiger Estate	33,055	11.65	SIRIM	
Imam Estate	62,971	22.20	SIRIM	
Table Estate	25,517	9.00	SIRIM	
Total	187,655	66.16		

3 rd Party OCP	96,000	33.84	Non-certified
Grand Total	283,655	100	

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

RSPO Supply Chain Model: Mass Balance	August 2020 to July 2021	August 2021 to May 2022	Total (MT)
FFB Received	236,714.97	161,350.95	398,065.95
FFB Processed	236,714.97	161,350.95	398,065.95
Certified FFB Processed	168,958.51	104,788.99	273,747.50
Non-certified FFB Processed	67,764.01	56,561,99	124,326.00
	Crude Palm Oil (CPC	D)	
Overall CPO Production	51,396.24	34,365.63	85,761.87
Certified CPO Production	36,710.06	22,332.29	58,942.35
Certified CPO delivered as RSPO	4,439.56	0	4,439.56
Certified CPO delivered as non- RSPO	26,684.18	9,476.77	36,160.95
Certified CPO delivered under	0.00	0.00	0.00
other sustainable schemes			
	Palm Kernel (PK)		
Overall PK Production	10,977.68	7,820.11	18,797.79
Certified PK Production	9,902.88	4,255.63	14,158.51
Certified PK delivered as RSPO	9,831.71	3,613.74	13,445.45
Certified PK delivered as non- RSPO	71.17	641.89	713.06
Certified CPO delivered under other sustainable schemes	0.00	0.00	0.00
Credit traded under Book & Claim	27,600		27,600

Table 4: Projected FFB received and CPO & PK dispatch by Merotai POM of next reporting period

<u>June 2022 to May 2023</u>

RSPO Supply Chain Model: Mass Balance	Total (MT)
FFB Received	283,655.00
FFB Processed	283,600.00
Certified FFB Processed	187,655.00
Certified CPO Production	41,940.90
Certified PK Production	9,082.50

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Merotai Estate	2,683.17	3,052.66
Tiger Estate	2,235.21	2,497.86
Table Estate	2,071.76	2,221.63
Imam Estate	3,347.06	3,773.56
Total	10,337.2	11,545.71

Table 6: Planting profile for Merotai Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	
1999	2 nd	Mature	175.24	6.53
2000	1 st	Mature	355.62	13.25
2000	2 nd	Mature	57.07	2.13
2001	2 nd	Mature	245.88	9.16
2002	2 nd	Mature 286.89		10.69
2004	3 rd	Mature	86.16	3.21
2005	2 nd	Mature 282.80		10.54
2007	2 nd	Mature 290.02		10.81
2008	3 rd	Mature	301.00	11.22
2009	3 rd	Mature	182.73	6.81
2010	3 rd	Mature		
2018	3 rd	Immature	62.97	2.35
2019	2 nd	Immature 230.67		8.60
	Total		2683.17	100

Table 7: Planting profile for Tiger Estate

Year of planting	ng Planting cycle (1st, 2nd, 3rd, etc. Generation) Mature / Immature (ha)		Planted area (ha)	Percentage of planted area (%)	
1995	1 st	Mature	74.13	3.32	
1996	1 st	Mature	45.89	2.03	
1997	1 st	Mature	369.39	16.53	
1998	1 st	Mature	Mature 875.39		
1999	1 st	Mature	308.40	13.80	
2007	2 nd	Mature	109.03	4.88	
2010	2 nd	Mature	46.75	2.09	
2016	2 nd	Mature	193.69	8.67	
2017 2 nd		Immature	Immature 212.54		
	Total		2235.21	100	

Table 8: Planting profile for Table Estate

Year of planting blanting Planting cycle (1st, 2nd, 3rd, etc. Generation)		Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1995	1 st	Mature	28.08	1.36
1997	1 st	Mature	340.16	16.42
1998	1 st	Mature	1204.37	58.13
1999	1 st	Mature	428.57	20.69
2015	2 nd	Mature	70.58	3.41
	Total			100

Table 9: Planting profile for Imam Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	, 3rd, Mature / Immature		Percentage of planted area (%)	
2017	2 nd	Immature	280.88	8.39	
2018	3 rd	Immature	278.41	8.32	
2019	2 nd	Immature	279.12	8.34	
2020	3 rd	Immature	138.07	4.13	
2000	2 nd	Mature	137.17	4.10	
2002	2 nd	Mature	206.04	6.16	
2004	3 rd	Mature	243.54	7.28	
2005	2 nd	Mature	246.59	7.37	
2008	3 rd	Mature	221.67	6.62	
2009	3 rd	Mature	481.79	14.39	
2010	3 rd	Mature	317.97	9.50	
2011	3 rd	Mature 312.75		9.34	
2014	3 rd	Mature	109.02	3.26	
2016	3 rd	Mature	94.04	2.81	
	Total		3347.06	100	

2.3 Organizational Information/Contact Person(s)

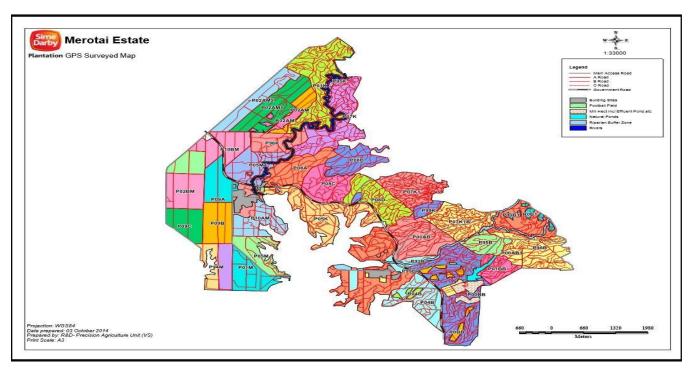
The details of the contact person are as below:

Name	:	Subramaniam Govindasamy
Position		Senior Manager KKS Merotai
Address	:	KM24 Jalan Merotai, Peti Surat 135, 91007 Tawau
Phone no.	:	089 – 762802
Fax no.	:	Nil
Email	:	kks.merotai@simedarbyplantation.com

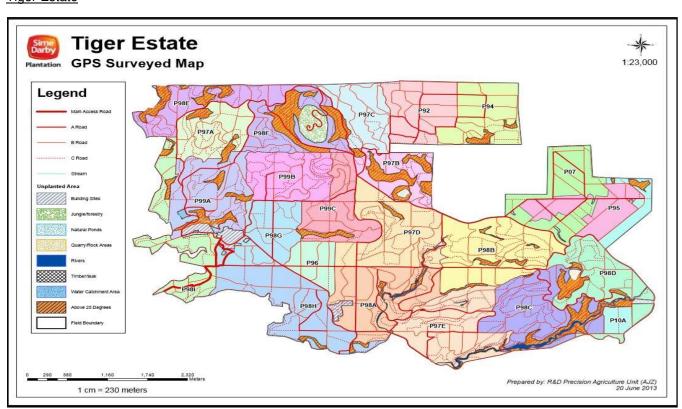
3.0	AUDIT FINDINGS
3.1	Changes to certified products in accordance to the production of the previous year No changes since previous audit.
3.2	Progress and changes in time bound plan (Refer to Attachment 6 for the time bound plan)
i.	Have all the estates under the parent company been certified? Yes No
	If no, comments on the organization's compliance with the RSPO partial certification rules : Sime Darby Platations is progressively undergoing the RSPO Certification process towards 100%.
	RSPO certification of estates/mills. Details provided in the Time Bound Plan described in Att. 6
ii.	Are there any changes to the organization's time bound plan? Yes No
	If yes, comment in terms of acceptance or non acceptance on the changes in the time-bound plan?
iii.	Are there associated smallholders (including scheme smallholders) in the CU
	If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its Certification?
	If no, please state reasons
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 to the organization
3.4	Status of previous non-conformities * * If not closed, minor non conformity will be upgraded to major non conformity * Compleint received from stakeholder (if any)
3.5.	Complaint received from stakeholder (if any) No significant complaints from stakeholders were observed.

4.0	DETAILS OF	NON-CONFORMITY	Y REPORT					
4.1	For P&C (Deta	ails checklist refer to	Attachment	3):				
	Total no. of mi (details refer to	nor NCR(s) o Attachment 3)	List:	2 (MZK 01 2022	2 & MZK 02 2022)			
	Total no. of ma (details refer to	ajor NCR(s) o Attachment 3)	List:	1(DA 01 2022)				
4.2	For SC (Detail	s checklist refer to A	Attachment 5)	:				
		f minor NCR(s) Attachment 3)	List : -					
	Total no. of ma (details refer to	ajor NCR(s) o Attachment 3)	List:	1 (MAR 01 2022	2)			
5.0	AUDIT CONCLUSION The audit team concludes that the organization has / has not* established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.							
6.0 F	RECOMMENDA	TION						
	☐ No No	CR recorded. Recom	nmended to d	ontinue certificat	ion.			
	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.							
	Recor	nmended to continu	e certification	l.				
	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	HAVE BEEN SA ACTIONS PLAI	ATISFACTORILY R NS PROVIDED ON D ACCEPTED. RE	EVIEWED, A	CCEPTED AND CONFORMITIE	VERIFIED AND AS HAVE BEEN SA	ATISFACTORILY		
Audit 7	「eam Leader :	Rohazimi	Mat Nawi	la	January .	16-09-2022		
		(Nar	me)		(Signature)	(Date)		

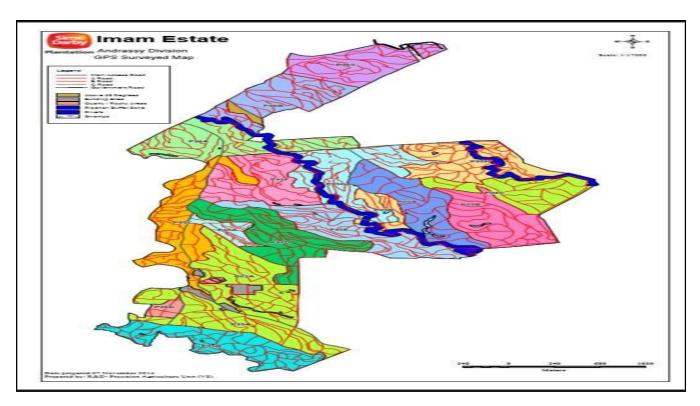
Merotai Estate



Tiger Estate



Imam Estate



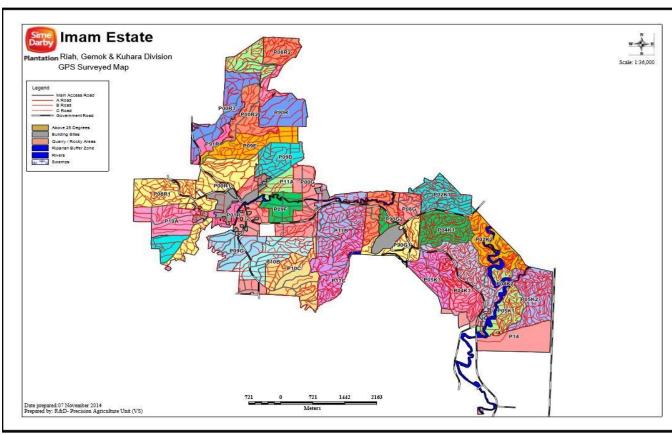
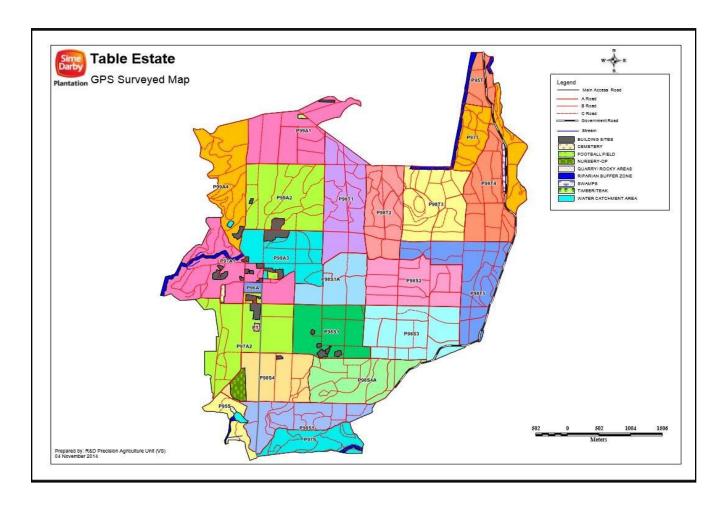


Table Estate



RSPO SURVEILLANCE AUDIT PLAN

1. Objectives

The objectives of the audit are as follows:

(i) To determine Certification Unit conformance against the relevant certification standards.

(ii) To verify the effective implementation of corrective actions arising from the findings of last audit.

(iii) To make appropriate recommendations based on the audit findings.

2. Date of assessment : 13th June 2022 – 17th June 2022

3. Site of assessment : Merotai Palm Oil Mill

Merotai Estate Tiger Estate Table Estate Imam Estate

4. Reference Standard:

a. MYNI 2019 of RSPO P&C 2018 / RSPO Independent Smallholder Standard, Nov 2019 / RSPO Management System Requirements and Guidance for Group Certification of FFB Production, March2018

b. RSPO Certification System Documents

c. Company's audit criteria including Company's Manual/Procedures

5. Assessment Team

Trainee Lead Assessor :Rohazimi Mat Nawi (RMN) – (Environment, Metric Template)

Auditor :Mohd Ab Raouf Asis (MAR)- (Social - Internal, Supply Chain)

Dzulfigar Azmi (DA)- (Enviroment, GHG & TBP)

Mohd Zulfakar Kamaruzaman (MZK) – (Social – External, HCV)

Amir Bahari (AB) (Safety, Environment) Mohd Nordin Abd Jalil (MNAJ) (GAP)

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

6. 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 andevaluation of records.

7. 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.

8. Confidentiality Requirements

SIRIM QAS International shall not disclose any information concerning the company regarding all mattersarising or coming to its attention with the conduct of the programme, which is of confidential in nature otherthan 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.

9. Working Language : English and Bahasa Malaysia

10. 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.

11. 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

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

a) Reporting time frames for economic data are:

i. Calendar year (January to December): January 2021 to December 2021, and

ii. 12-month period counting up to two months before audit month: Apr. 2021 to Mar. 2022

b) Reporting time frames for demographic data:

i. For mill and estate workers: as of 31 December 2021

ii. For smallholders and outgrowers: January 2021 to December 2021

c) Reporting time frame for all other social and environmental data:

i. January 2021 to December 2021

The updated Metrics Template (as attached, the version 2.0) 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 Programme Details : As below

Day 1: 13 June 2022 (N	Monday)	RMN	MAR	DA	MZK	MNAJ	AB
8.30am – 9.15am	Opening Meeting – Venue: Will be decide by client Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings.	/	/	,	/	/	/
9.15am – 12.30pm	Site observation to Merotai POM RSPO Supply Chain RSPO Supply chain standard implementation including model requirements P1, P2, P3, P4, P5, P6, P7 Cocupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Land titles user rights Social aspects - SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management	/	/	/	/	/	1
12.30pm – 1.30pm	Lunch Break						
1.30pm – 5.00pm	Continue assessment at respective sites	1	/	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	RMN	MAR	DA	MZK	MNAJ	AB
Day 2: 14 June 2022 (T	Fuesday)						
8.30am — 12.30pm	Site observation to Tiger Estate P1, P2, P3, P4, P5, P6, P7 Verification of basic information estate Confirmation of time bound plan & review of partial certification Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Cocupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Interview with workers, contractors etc. Cocupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management	/	/	/	/	/	/

12.30pm – 1.30pm	Lunch Break						
1.30pm – 5.00pm	Continue assessment at respective sites	1	/	1	/	/	/
Date / Time	Coverage of assessment / Activity / Site	RMN	MAR	DA	MZK	MNAJ	AB
Day 3: 15 June 2022 (We	(ednesday)						
8.30am – 12.30pm	Site observation to Merotai Estate P1, P2, P3, P4, P5, P6, P7 Cocupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Interview with workers, contractors etc. Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management	/	/	/	1	,	/
12.30pm – 1.30pm	Lunch Break		_		_		
1.30pm – 5.00pm	Continue assessment at respective sites	/	/		/	/	/
Date / Time Day 4: 16 June 2022 (Th	Coverage of assessment / Activity / Site	RMN	MAR	DA	MZK	MNAJ	AB
8.30am – 12.30pm	Site observation to Table Estate P1, P2, P3, P4, P5, P6, P7 Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management						
	 Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Interview with workers, contractors etc. Occupational safety & health aspects, chemical management Interview with workers, contractors etc. 	/	/	/	/	/	1
12.30pm – 1.30pm	 Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Interview with workers, contractors etc. Occupational safety & health aspects, chemical management 	/	/	/	/	,	1

Date / Time	Coverage of assessment / Activity / Site	RMN	MAR	DA	MZK	MNAJ	AB

Day 5: 17 June 2022 (F	riday)						
8.30am – 12.30pm	Site observation to Imam Estate P1, P2, P3, P4, P5, P6, P7 Cocupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Interview with workers, contractors etc. Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Confirmation of time bound plan & review of partial certification	/	/	/	/	/	/
11.30pm – 1.30pm	Lunch Break and Friday prayer						
1.30pm – 3.30pm	Continue assessment at respective sites		1		/	/	/
3.30pm – 4.00pm	 Verification on outstanding issues Audit team discussion, preparation on audit findings and issuance of nonconformity report (if any) 	/	/	/	/	/	/
4.00pm -5.00pm	Closing meeting at respective site (decide by client) Presentation of audit findings, positive comment, Question & answer	/	/	/	/	/	/

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

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	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	Yes	SOU 30 Merotai CU continued to use the internet to disseminate public information relating to company policies, land titles, human rights, FPIC, safety and health plans, pollution prevention plans and the procedure for complaints and grievances. The SDPB website address is http://www.simedarbyplantation.com/ . For social programmes on education, environment, community and health, etc, Yayasan Sime Darby as the Foundation has expanded its wings from offering scholarships to outstanding and deserving individuals to funding impactful conservation, outreach and development programmes. The SDPB website address http://www.yayasansimedarby.com/ .
Criteria, in appropriate appropriate languages and forms to allow for effective appropriate languages and accessible to relevant stakeholders.	Yes	Merotai 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.	
participation in decision making.	1.1.3 (C) Records of requests for information and responses are maintained.	Yes	The Merotai 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 (entitled "Procedure for External Communications". A review of the records kept in the internal and external communication files found that the operating units at Merotai CU followed the procedures and manuals developed by the company.
	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 representative from Social Dialog, 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.

Clause	Indicators	Comply Yes/No	Findings
			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 Merotai 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 ad 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.

<u>Principle 2: Operate legally and respect rights</u>
Implement legal requirements as the basic principles of operation in any jurisdiction.

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance	2.1.1 (C) The unit of certification complies with applicable legal requirements.	Yes	Generally, the CU has complied with applicable legal requirements.
with all applicable local, national and ratified international laws and regulations.	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	Yes	The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them. Each estate and mill had its own Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the person in-charge and approved by the respective managers. The RSQM Department is responsible to track changes and the information was disseminated to all its plantations and Mill department.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained,	Yes	Boundary stones / markers along the legal boundaries observed visibly maintained by the CU. Auditor has verified the boundary stone and pegs at Merotai Estate, Imam Estate,
	and there is no planting beyond these		Table Estate and Tiger Estate. The boundary pegs were visible along the boundary

Clause	Indicators	Comply Yes/No	Findings
	legal or authorised boundaries.		adjacent to another plantation area. All the physical markers/Boundary stones along the legal boundaries between was visibly available.
2.2 All contractors providing operational services and	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 30 Merotai, and duly updated when necessary. They include harvesting contractors, suppliers, transporters, replanting contractors, etc.
comply with 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.	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements as verified through Online Vendor Registration (OVR) and the Vendor Code of Business Conduct (VCOBC) which apply to all contractors for due diligence and meeting legal requirements. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, were clearly stated in contract between Sime Darby and all contractors.		
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	Yes	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 apprentice-ship, educational and training programmes.
2.3 All FFB supplies from outside the unit of certification are from legal sources.	 2.3.1 (C) For all directly sourced FFB, the mill requires: Information on geo-location of FFB origins. Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license 	Yes	Merotai POM is currently established for the following for the directly source of FFB: 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) Valid MPOB License 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	All FFB are received direct from the suppliers.

Principle 3: Optimise productivity, efficiency, positive impacts and resilience Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
The business plan and budget were available and kept in soft copy. The documents were categorised as confidential. Information in the documents were sighted and briefed by the Estates/Mill	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	Yes	The business plan and budget were available and kept in soft copy. The documents were categorised as confidential. Information in the documents were sighted and briefed by the Estates/Mill Managers. Generally, the estates business plan was towards sustainable business and prepared in a 3 to 5 year horizon. The components of the business plan are presented in a budget format comprising of the following. Crop yielding area, Yield statement oil palm, Total upkeep & cultivation, Labour statement/Allocation of wages/Labour benefit summary, Summary of vehicle and running schedule/Job allocation for vehicles, Summary of workshop running schedule, Summary of general charges, Summary cost/ha & cost/mt FFB, CAPEX.
Managers. Generally, the estates business plan was towards	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	Yes	The long-range replanting program (LRRP) until 2025 was sighted for all the estates. This program is reviewed once a year and incorporated into their annual financial budget.
sustainable business and prepared in a 3 to 5 year horizon. The components of the business plan are presented in a budget format comprising of the following. a) Crop yielding area b) Yield statement oil palm c) Total upkeep & cultivation d) Labour statement/Allocat ion of wages/Labour benefit summary e) Summary of vehicle and running schedule/Job allocation for vehicles f) Summary of	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Yes	The organization had conducted management review meeting for each operating unit. Among the agenda been discussed were: 1.Result of Internal Audit 2.Customer feedback 3.Process performance of products 4.Continual improvement 5. Resource needed 6.Etc

Clause	Indicators	Comply Yes/No	Findings
workshop running schedule g) Summary of general charges h) Summary cost/ha & cost/mt FFB			
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	Yes	The management documents in relation to environmental plans and impact assessments were made available and maintained at all audited operating units.
performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	Yes	RSPO metrics template had been updated and completed by the organization.
3.3 Operating procedures are appropriately	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. It was evident that SOPs are in place.
documented, consistently implemented and monitored.	3.3.2 A mechanism to check consistent implementation of procedures is in place.	Yes	The organization had planned internal audit once per year. Internal audit conducted by competence auditor from Sustainability Compliance unit under Group Sustainability Department. 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.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	Yes	The implementation of SOPs 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 Social and Environmental Impact Assessment (SEIA) is undertaken	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is	Yes	There was no new planting in Merotai CU. Environmental Aspect and Impact Assessment (EAI) and Social Impact Assessment (SIA) was conducted internally considering activities associated to estate and mill operations. Thus, this indicator not applicable.

Clause	Indicators	Comply Yes/No	Findings
prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	documented. 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	The Social Impact Assessment (SIA) for CU Merotai was available. The assessment was carried out by PS-RSPO Unit, TQEM Dept, SDSB in September 2013. It covered the Merotai Palm Oil Mill, Merotai Estate, Imam Estate, Table Estate and Tiger Estate. The SIA Report was entitled "Baseline Social Impact Assessment (SIA), Sabah Zone, SOU 30" dated September 2013. Records of meetings were documented and made available during the audit. Among the stakeholders who attended were workers, staff, workers' union, suppliers, contractors, community heads and teachers. Respective estate map, manpower statement as at September 2016, date of focus group discussions held, number of participants who attended each session, number of internal and external stakeholders consulted, stakeholders' perspectives, issues that were raised, and proposed mitigation/enhancement measures were included in the individual report for each estate. Potential impact factors covered included stakeholder mapping, employment conditions, living conditions, health & safety in the workplace, public health & safety, respect for human rights, communication with management, and community relations. The positive impacts and negative impacts was note down and elaborated in indicator 3.4.3 for each estates and POM. Environmental Aspect and Impact Assessment (EAI), Management Action Plans and Pollution Preventive Plan which covers form upstream activities such as FFB reception until downstream processes was sighted during assessment. Last reviewed on 10/02/2022 estate management. Identification and evaluation of environmental aspect 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 to land application. For supply base estates, the assessment was to evaluate and analyse the operations impact on soil, water, and air associated with the organization activities. The EAI review process
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated	Yes	It was evident that the SIA & EIA were reviewed and updated in a participatory way.

Clause	Indicators	Comply Yes/No	Findings
	regularly in a participatory way.		
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, and for foreign worker, the employment procedures are contained in Standard Operating Process & Procedures (SOPP). Employment procedures for retirement and termination are available in the local workers' employment contracts. Similarly, foreign workers' contracts also contain provision for mutual termination. Retirement procedure is not applicable to foreign workers. 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	The recruitment process was clearly stated in the procedure where the recruitment was based age, medical fitness and etc. There is no any discrimination based on religion, gender, nationality and etc during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. Meanwhile, for promotion process are available for the local & foreign workers in the amended procedures under "Title: Career Progression for Workers Level". Records are maintained accordingly.
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; No Task Activity 1 OSH Legal Compliance Review all relevant legal compliance 2 Emergency Response ERP Training Fire drill

Clause	Indicators	Comply Yes/No	Findings					
				3 4	OSH Management System Risk Management Accident Investigation/	Enforcement Visit Review documentation HIRARC review Identify High Risk Area maintenance Hygiene Tech Accident Investigation JKKP 8/6 submission		
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	Yes	The training program for 2022 covering all aspects of the RSPO Principles and Criteria and other essential operations activities has been established. Regular assessments of training needs were available and verified. Training needs identification matrix has been established with target dates for of implementation. The estates and mill will have local adjustment to tailor with individual needs for training program.					
	3.7.2 Records of training are maintained, where appropriate on an individual basis.3.7.3 Appropriate training is provided for	Yes Yes	RSPO training file. The records included information on the title of the train and signature of the attendees, name of the trainer, time and venue.					
	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.		imp Mar	hain Certification Standard (SCCS) has been conducted in el involved in the RSPO SC system and Attendance list & 2022, for transporter contractor.				

SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is	Yes	Not applicable since this mill is Mass Balance.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	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.		
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 rd party certified supply base.	Yes	Merotai POM received certified FFB from own Estate Which is Merotai Estate, Table Estate, Tiger Estate and Imam Estate and non-certified FFB from Surrounding Smallgrower and Small holder total up to 25 suppliers. Thus, Merotai 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: Merotai Oil Mill - Sime Darby Country: Malaysia. Member Category: Oil Mil Core product: Palm Oil Start date: 13/7/2020 End date: 12/7/2025

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard. The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	Yes	"Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia" document ID: SD/SDP/GSD/SCCS/0522/01. The procedure described the following: Clause 3.0 ~ Scope Clause 4.0 ~ The responsibility of for the implementation of RSPO SCC i.e. head of operating unit Clause 5.0 ~ Control of document & records such as weighbridge tickets, consignment note, training record & contracts. Record retention for 10 years. Define the critical control point (CCP): estate — weighbridge, mill — weighbridge, admin office, ramp, CPO despatch area, CPO storage tank. Kernel silos. Clause 6.0 ~ Delivery of FFB from the estate — relevant record involved, flowchart for crop diversion, list of mill and their supply chain model i.e. IP or MB Clause 7.0 ~ Receiving FFB at the mill — list of supply base, rules for determining diverted FFB destination, relevant record Clause 8.0 ~ ISCC Compliant waste / residues materials Clause 9.0 ~ Process monitoring — for IP model mill need to ensure no mixing of RSPO certified and non-certified and MB model Clause 10.0 ~ CPO and PK despatch — [Clause 9.1] all delivery of CPO and PK shall be in accordance with the contract allocated by Global Trading & Marketing (GTM) department Clause 11.0 ~ Non-conforming material / product — requirement to downgrade the RSPO Product Clause 12.0 ~ Product claim — shall follow RSPO rules on market communication & claim Clause 13.0 ~ Outsourced contractor - the mill has established list of outsourced contractor. Sighted list of transporter for CPO and PK. Clause 14.0 ~ Training — the mill shall provide training for relevant personnel carrying the task at tech critical control point (CCP). Clause 15.0 ~ Reclassification of mill's supply chain model may be determined by GTM/ PSQM. CB shall be notified. All communicated shall be recorded. Clause 18.0 ~ Internal Audit Clause 19.0 ~ Conversion Factors Cla

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.6	 The site shall have a written procedure to conduct annual internal audit to determine whether the organisation; Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Effectively implements and maintains the standard requirements within its organisation. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports. 	Yes	Internal audit procedure, document ID: SD/SDP/PSQM/IAP, is available. Audit report has also been established. The audit was conducted against the RSPO Supply Chain requirements. RSPO internal audit was conducted in March 2021 by the internal auditor. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard- RSPO MYNI 2019 and the RSPO Market Communications and Claims Documents. There are 1 major NCR were raised by auditor. Minor NCR has been answered, auditor has found all of the corrective action has successfully address by the POM. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor. Management review meeting has been conducted on dated 24/02/2022 and 23/3/2022 (combine RSPO, RSPO SCCS and MSPO) Internal audit – 1 major on overproduction. Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result achieved. Previous meeting – was highlighted Changes – There is no significant changes accept transfer of Assistant Manager. Recommendation for improvement – improve the established system

Ref. in RSPO SCCS	Indicators	Comply Yes/No		Findings	
3.8.7	The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. The site shall inform the CB immediately if there is a projected overproduction of	No	Table Estate, Tiger Estate Smallgrower and Small ho checked accordingly. Howe of certified tonnage for FFB	e and Imam Estate and rolders. The validity of the over, the site does not inform production at KKS Merotai	own Estate Which is Merotai Estate, non-certified FFB from Surrounding certificate of the supplier has been in the CB on projected overproduction. Based on documentation review on 2, there was over production of FFB
	certified tonnage.		Projected (mt FFB)	Actual (mt FFB)	Variance (mt FFB)
			268,916.48	273, 747.50	+ 4,831.02
	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.		Therefore, major NCR issue		

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.8	Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The 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): a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number	Yes	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 Merotai POM.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification. (ii) The mill shall ensure the following: a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.	Yes	There are 1 outsource company CPO and PK. 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 for transporter contractor was sighted by the auditor. a) There is contract document between Merotal POM and the transporters. But there is another attachment (Annexure 5) stated that the contractor agrees that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. b) The RSPO Supply Chain procedure has described on Para 13.0 Outsource Contractor and briefed to the contractor.
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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Yes	List of stakeholders updated in June 2022 has detailed in all contractors used for the processing or physical handling of RSPO certified oil palm products. Among the contractors verified were Rimbun Hijau which is currently CPO & PK transporter.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Yes	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	Yes	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up-to-date.
	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Yes	Relevant record was maintained for more than 2 years as per Standard operating procedure for 'Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia".
	iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real- time basis.	Yes	Not Applicable since this mill is MB Mill
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by	Yes	Available, sighted during the audit.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)		
3.8.13	Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	Yes	Merotai 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). The figures were monitored on daily & monthly basis by the mill using the prepared template (e.g. Monthly Production Report – Physical Movement) to ensure their accuracy as well as monitoring of their ongoing performance.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Yes	
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from noncertified oil palm products, including during transport and storage to strive for 100% separation.	Yes	Not Applicable since this mill is MB Mill
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date	Yes	Documented procedures related to sales and goods out were sighted and found adequate. The requirement of sales & goods out especially on notation of applicable Supply Chain model & Certificate number being complied by indicating in weighbridge dispatch ticket. The registration of transaction being carried out by Group Plantation Marketing subordinate using the RSPO Member ID. Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).

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

Principle 4: Respect community and human rights and deliver benefits
Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	Yes	Policy to respect human rights is available and documented in the Sime Darby Plantations Human Rights Charter. The Policy was communicated to stakeholders which included FFB suppliers during stakeholder meeting in January 2022. The Group has established a specific Policy on Human Right Defenders, Whistleblowers and Complainants and the Policy had been finalised by GSQM. The Group Policies & Authorities (GPA) No. B5 WHISTLEBLOWING POLICY. At section 4.3 (g) self-explanatory that "For the purposes of this policy, the following improprieties are referred to as 'Wrongdoing' whether committed within the Group or in connection with the Group's business: Breaches of any Group policies and/or COBC which also refer to the Policy on the Protection of Human Rights Defenders (HRDs).
	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 30 Merotai 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).

Clause	Indicators	Comply Yes/No	Findings
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	Yes	The system used by the SOU 30 Merotai in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Procedures for handling Social Issues". The Mill and Estates within SOU 30 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.SDPB have several initiatives to the complaints and grivances and ensuring anonymity of complainants such as SuaraKami and Ulula. SuaraKami organized by SDPB itself in 2018 which employees can lodged the complaint through hotline number 1-800-818-771. The details of SuaraKami can be find through website https://www.simedarbyplantation.com/sustainability/programmes/human-rights-and-decent-work/grievance-mechanism .
	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 available and communicated to relevant stakeholders.	Yes	Paragraph 7 of Appendix 5 Sustainable Plantation Management System, Flowchart and Procedure On Handling Social Issue, states upon failure of negotiation process involving estate management, representatives from the disputed parties, zone heads, third parties and stakeholders, legal proceedings may follow. Paragraph 8 of Appendix 3 of the same document on procedures Handling Land Disputes states that "further negotiation processes may involve independent third parties such as representatives from the Land Office or from other NGOs." Therefore, the conflict resolution mechanism includes options to access independent legal and technical advice.
	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 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.
4.3 The unit of certification contributes to local	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.		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 92% of the staff and non-clerical staff are from surrounding villagers which is the main Contributions to community development.

Clause	Indicators	Comply Yes/No	Findings
sustainable development as agreed by local communities.			
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	Yes	The legal ownership and the maps to indicate the boundary stone were sighted at Merotai, Table, Imam and Tiger Estate. The Land Title for All Estate has been verified, for all Estate (Merotai, Table, Imam, Tiger and POM), all the land title is originally from Borneo Abaca Limited and company has change their names to Bal Estates Sdn Bhd on 13/8/1985. The company has bought the land from Colony of North Borneo (Sabah Govt) on 4th January 1937. The company then merge with Golden Hope Plantations (Sabah) Sdn Bhd on 14/11/1996. And soon after that, Golden Hope has merge with Sime Darby on 1/7/2008.
	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 Merotai since 1951. The audit team had confirmed that there were no land issues related to previous owners.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	Yes	
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or 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	Yes	

Clause	Indicators	Comply Yes/No	Findings
	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.		
	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 Merotai since 1951. 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.
	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 Merotai.
	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 Merotai.
	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 Merotai.
4.5 No new plantings are established on local peoples' land	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	Yes	Based on Social Impact Assessment (SIA) Report for SOU Merotai and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Sime Darby SOU Merotai since 1951. The audit team had confirmed that there were no land issues related to previous owners.

Clause	Indicators	Comply Yes/No	Findings
where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. 4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Merotai since 1951. 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. As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Merotai since 1951. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land	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 Merotai since 1951. 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.

Clause	Indicators	Comply Yes/No	Findings
	allocation process. 4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Merotai since 1951. 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 checklists, it has been verified that the land is now legitimately owned by Sime Darby SOU Merotai since 1951. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	Yes	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
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	Yes	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System document 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.
thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views	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	Yes	In accordance with the 'Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan"/ 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.

Clause	Indicators	Comply Yes/No	Findings
through their own representative institutions.	corrective actions taken as a result of this evaluation.		
	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 Merotai. 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 process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are	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.
compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	Yes	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighbouring estate. It can be concluded that there was no evidence of any land dispute at SOU Merotai, hence the evidence required under this clause was not available.
negotiated agreements.	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 reported in 4.4.1 of these checklists, it has been verified that the land is now legitimately owned by Sime Darby SOU Merotal since 1951. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
4.8 The right to use the land is demonstrated and is not legitimately	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,	Yes	As reported in 4.4.1 of these checklists, it has been verified that the land is now legitimately owned by Sime Darby SOU Merotal since 1951. 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.

Clause	Indicators	Comply Yes/No	Findings
contested by local people who can demonstrate that they have legal, customary, or user rights.	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.		
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	Yes	Land conflict is not present in the area of the unit of certification. The audit team has interviewed relevant stakeholders and it can be concluded that there was no evidence of any land dispute at SOU Merotai, hence the evidence required under this clause was not available.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).	Yes	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. It can be concluded that there was no evidence of any land dispute at SOU Merotai, 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 (including neighboring communities where applicable).	Yes	There was no conflict or dispute over the land. It has been further confirmed through interviewed relevant stakeholders and it can be concluded that there was no evidence of any land dispute at SOU Merotai.

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	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.		Merotai POM has displayed the current prices paid for FFB at the mill's weighbridge counter. The FFB prices (OER) were displayed at the weighbridge were as follows: May 22: RM 65.90 (1% OER) Apr 22: RM 64.71(1% OER) Mar 22: RM 63.87 (1% OER)
(Independent and Scheme) and other local businesses.	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 Merotai regularly explains the FFB Pricing to Smallholders surroundingThe stakeholder information briefing concerned to FFB qualities, FFB grading, calculation payment by MPOB, oil extraction rate (OER). The calculation method of pricing was made known and given to the Smallholders. Field days were organised monthly by the mill to all the small holders from the supplying list.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	In Merotai POM Price for FFB adopted the MPOB Pricing. All prices are calculated by the MPOB and the mill take the price and follow what MPOB guided.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	Yes	There is no bound contract for FFB outside supplier sending crop to the Merotai POM. The Suppliers are freely to choose the mill choice of theirs. Except contract for payment rate, Quality of crop, and how payment has been made and it was found that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	Yes	There is no bound contract for FFB outside supplier sending crop to the Merotai 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,
	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.

Clause	Indicators	Comply Yes/No	Findings
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Yes	It was evident that the weighing Equipment in SOU Merotal 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 Merotai 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 promote on RSPO certification. However, currently the Growers and villagers were not in favor in the implementation due to high cost. Their only focus for MSPO first.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	Yes	There is a document namely "Flowchart and Procedures on Handling Land Disputes", Flowchart and Procedure on Handling Social Issues. Sime Darby Whistleblowing Policy ensures anonymity. The Policy contains the Whistle Blower Complaint Response where the complainant has the option of remaining anonymous by not revealing his/her identity.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	No	Sime Darby SOU Merotai 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 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. Thus, Minor NCR MZK 01 2022 has been raised
	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	Sime Darby SOU Merotai 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 (Mesyuarat Kerjasama Dua Hala) 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 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) Thus, Minor NCR MZK 02 2022 has been raised
	5.2.3 Where applicable, the unit of certification provides support to	Yes	Sime Darby SOU Merotai supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the

Clause	Indicators	Comply Yes/No	Findings
	smallholders to promote legality of FFB production.		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 (Mesyuarat Kerjasama Dua Hala) 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. Their only focus for MSPO first. Refer NCR Above
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Yes	Sime Darby SOU Merotai 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 (Mesyuarat Kerjasama Dua Hala) 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. Their only focus for MSPO first.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Yes	Currently Sime Darby SOU Merotai 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 Sabah doesn't want to involve because of financial restriction.

Principle 6: Respect workers' rights and conditions

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

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	Yes	The policy of Group Sustainability and Quality Policy Statement has been approved by Group Managing Director. Para 3.2.5 in the HRC clearly stated promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. SDPB according to the statement, also will facilitate opportunities for advancement for their employees, especially women by removing barriers to progress and respecting reproductive and maternal rights.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including	Yes	Apart from the indicator 6.1.1 policy which states that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees. As confirmed by the workers during interviews and field observation, payment of wages/salaries, provision of housing and access to benefits and amenities is fair based on observation, review of pay checks, contracts of

Clause	Indicators	Comply Yes/No	Findings
	charging of recruitment fees for migrant workers.		employment, including charging of recruitment fees for migrant workers.
	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	Based on interviews with the estate and mill management including documentation review (interview assessment and medical report), recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness appropriate for the job. Interview of candidates will be done by Manager and the Assistant Managers where an evaluation form is filled up to determine the suitability of the candidate. These documents are contained in the workers' personal files. Among the sampled documents sighted belonged to the following workers as per indicator 6.2.1.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	Yes	As of the date of the audit, it was confirmed by the worker during interview, there is no evidence that pregnancy testing was carried out in a discriminatory manner. Pregnancy test was done on the worker own free will. Based on the interview, if there any case of pregnancy, the female worker will be assigned to do light general work.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	Yes	The committee was established among the female employee, staffs, employees' staffs and executives or staffs wives. Among the issue/suggestion/briefing: 1. Awareness on the sexual harassment. 2. Family day. 3. Give counselling to the workers to whom need a help. 4. Awareness on the social policy and women's right. 5. Awareness on the reproductive rights and human rights charter.
	6.1.6 There is evidence of equal pay for the same work scope.	Yes	Comparisons were made of sampled employment contracts and payslips of harvesters. Evidence is available that sampled workers receive equal pay for equal work.
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	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	Contracts for local and Indonesian foreign workers at the Merotai POM, Table Estate, Merotai Estate, Tiger Estate and Imam Estate were sampled and confirmed that all workers and the management signed a dated contract of employment. The terms and conditions of employment are contained in the employment contracts which include duration of employment, place of work, salary, working hours, medical benefits, annual leave, sick leave, termination of service, and other benefits provided (housing, employment cost, etc.). The contract was available in both languages (English and Bahasa Malaysia). Each paragraph in the contract was explained to the workers by the mill and estate management prior to signing.
decent living wages (DLW).	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.	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. 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

Clause	Indicators	Comply Yes/No	Findings
	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.		description, (basic, price bonus, productivity incentive, allowances, deductions for SOCSO, EIS, KSWP, total income for the month, total deductions, net pay. None of the workers have family members working to help them with their work.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	Yes	There is evidence that workers observe regular working hours including overtime hours within the legal confines of the Sabah Labor Ordinance. This was verified from the mill workers' employment contracts, punch cards and interviews with the workers themselves. They are also entitled to at least 30 minutes' rest after 5 hours of work. Similarly, workers with medical certificates are given a paid medical leave, and female workers are given 3 months maternity leave. There is no evidence of termination, and so compliance with reasons for dismissal and period of notice could not be verified during this audit. Salary deductions are made for statutory deductions such as SOCSO, EPF, and EIS. For non-statutory deductions such as for payment of electricity and water bills, records are available of written permits from the Department of Labour, Sabah.
	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	The Merotai POM and Table, Merotai, Tiger and Imam Estate, have provided adequate housing, water supplies, medical, educational and welfare amenities. These were found to be in accordance with the Workers' Minimum Standard of Housing Standard of Housing and Amenities Act 1990 (Act 446). Workers' housing inspection was carried on weekly as per Section 23(2) of the Workers' Minimum Standards of Housing & Amenities Act 1990 (Act 446). The houses were all in good conditions, and each house has between 2 – 3 bedrooms. Among the facilities provided are creche, CLC school, clinic where medical treatment and facilities are provided for free, sundry shops selling daily necessities such as rice, flour, sugar, cooking oil, etc. The workers' housing areas also have a mosque, a community hall, a football field, and badminton/volleyball court. Workers interviewed confirmed that the houses and amenities provided are adequate, comfortable and requests for repairs were attended to in a timely manner. All houses have constant water supply and electricity which are provided free of charge. Even if the water and electricity supply is not continuous daily, this is not seen as an inconvenience because each house has its own water storage tank.
	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. Merotai Estate – agreement between SDP and Sumarni binti Buhari, shophouse tenancy agreement dated January 2022.

Clause	Indicators	Comply Yes/No	Findings
	 6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following: • An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. • The unit of certification may choose to implement the "living wage" payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation 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. 	Yes	All sampled workers receive at least minimum wages based on Minimum Wages Order 2022. The new Minimum Wages Order 2022 gazetted on May 2022 and came into effect on 1 May 2022. Merotai POM, Tiger Estate, Table Estate, Imam Estate and Merotai Estate had calculated the prevailling wages and in-kind benefits for their workers. The calculation incuded 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.

Clause	Indicators	Comply Yes/No	Findings
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	Yes	All the estates and mill employ full-time employees. Foreign workers are full-time employees but have a contractual duration which is stipulated in their employment contracts which is 2 years for Indonesians and 3 years for other nationalities. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	Yes	Recognition of freedom of association is available in the Sime Darby Plantation Social Policy dated January 2015. The policy states that the company respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. This Social Policy was applicable throughout all operating units and was printed and translated in Bahasa Malaysia and displayed on all notice boards throughout the CU.
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	Yes	Social dialogue done comprises of the employees' representatives. The social dialogue is open for employee to lodge or raised any complaints / suggestions. The management were also recorded briefing during morning muster, where during morning muster the workers are allowed to give suggestions / complaints.
	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	The election was done in Dec 2021 It was evident that the election done through SMS among the workers.
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 the Sime Darby Social Policy. This undertaking to not hire child labour is included in all service contracts and supplier agreements. In addition, para 3.3 of the Human Right Charter respect to the to the children rights whereby company did not take any person/children below 18 years old.
	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	Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements are met throughout SOU 30 Merotai.

Clause	Indicators	Comply Yes/No	Findings
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	Yes	There was no evidence that any young persons were employed in any of the units at SOU 30 Merotai as evidenced from documentation review, field observations and interviews.
	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	Based on the documents sighted, communication about its no child labour Policy was communicated to all levels of employees as evidenced from training records available.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	Yes	The policy to prevent sexual and other forms of violence is contained in the Sime Darby Social Policy dated January. Based on interviews conducted and documents reviewed, there is evidence that the Policy is being implemented. Workers interviewed confirmed their understanding of the Policy, what constitutes sexual harassment and knows how to lodge a complaint. There is no evidence of any sexual harassment, or any form of harassment having occurred. In addition, SDP develop Human Rights Charter revised 2020, para 3.2.5: promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. The company will facilitate opportunities for advancement for our employees, especially women by removing barriers to progress and respecting reproductive and maternal rights. In addition, para 3.2.1 of the Human Rights Charter on prevent any sexual exploitation.
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and comm. to all levels of the workforce.	Yes	The policy to protect reproductive rights of women is contained in the Sime Darby Plantation Gender Policy. Based on interviews conducted and documents reviewed, there is evidence that the Policy is being implemented. Workers interviewed, especially women employees from all levels of the workforce confirmed their understanding of the Policy.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	Yes	During this audit, there has been no evidence of any new mothers and therefore this indicator could not be verified. However, based on interview conducted with the Gender Committee members at Table Estate, two years ago when she was pregnant, her needs were attended to which included a private room where she could express milk and a fridge for storage were made available.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and comm. to all levels of the workforce.	Yes	A grievance mechanism which respects anonymity and protects complainants is in place at the CU as per the Sime Darby Gender Committee Handbook 1st Edition 2014. The grievance mechanism which respects anonymity and protects complainants have been effectively communicated to all levels of workforce. All sampled workers and staffs were aware of the mechanism that the Company has which provides anonymity and protects complainants.

Clause	Indicators	Comply Yes/No	Findings
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: Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty to the workers for termination of employment Debt bondage Withholding of wages 6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established	Yes	Collective evidence is available that all sampled workers have entered into employment voluntarily. This is based on the following: a. review of sampled employment contracts which contain mutually agreed termination clause; b. review of documents where workers signed consenting for their passports to be kept at the office; c. interview with foreign workers who confirmed they could have access to the passports at any time; d. review of recruitment agency contract for Sime Darby Plantation Berhad. Until ASA 2 audit, the new agreement for all recruitment agency yet to endorsed by the management, hence no new foreign workers enter thru recruitment agency. e. records of punch cards and workers confirmation that overtime work is mutually agreeable and not forced on them; f. confirmation from the foreign workers that they received accurate briefing in their home country on the job they would be doing in Malaysia; g. and confirmation from the workers that there is no debt bondage or withholding of wages. The SOU 30 Merotai adopts the Social Policy dated January 2015 which states that "All employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work and representation race, caste, nationality". There is also a procedure
	and implemented.		entitled "Sourcing Process for Foreign Workers". Based on observations and interviews of foreign workers (harvesters, sprayers, mill workers), there is no evidence of contract substitution and no discriminatory practices against foreign workers. A post-arrival briefing is also given, in particular on the contents of their employment contracts, safety, benefits, etc.
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	Yes	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.
neaut.	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	Yes	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

Clause	Indicators	Comply Yes/No	Findings
	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.		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 th estates. Procedures guidelines were issued by RSQM and amended to tailor to the situation differences in the estates and mills. ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The 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
	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.
	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 Merotai 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', Mac & May 2022 for Mill & Estates. The 'Health Care' is managed by the respective estates. Merotai Estate which is 1 km away provides medical facilities and services for Merotai 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.

<u>Principle 7: Protect, conserve and enhance ecosystems and the environment</u>

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	Merotai SOU 30 continued to implement Integrated Pest Management (IPM) in all the 4 estates and continue to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Agricultural Reference Manual (ARM) Section 15 - Plant Protection. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. For bagworm control the program includes the planting of beneficial plants such as <i>Cassia cobanensis</i> , <i>Antigonan leptopus and Turnera subulata</i> and for rhinoceros beetles is by using pheromone traps. Merotai SOU 30 carried out census on rat damage and diseases like Ganoderma. The IPM technique to control rats includes rearing Barn owls (<i>Tyto alba</i>) and rat baiting was by calendar baiting at 2 campaigns per year. Rat baiting would continued until bait acceptance fell below 20%. The procedure referred was in the Agricultural Reference Manual (ARM) Section 15 - Plant Protection.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	Yes	Species referenced in the Global Invasive Species Database and CABI.org. were used in managed areas of the 4 estates. Such as antigonan species for attarack predetor to control population of bagworm. The spread of plant was under control of management of estate. • Antigonon leptopus (Beneficial Plant) – information on the species' invasiveness specifically in Malaysia is not available on CABI.org and GISD websites • Cassia coboanensis (Beneficial Plant) – species is not available on GISD and CABI.org websites • Turnera subulata (Beneficial Plant) - species is not available on GISD and CABI.org websites
	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	Merotai SOU 30 continued to use the Agricultural Reference Manual (ARM) policy of no open burning. As advocated, the 4 estates practised Zero burning thus no use of fire for pest control. In the 2019, 2020 and 2021 replants visited during the audit in the estates, it was evident that all palms were felled, shredded, windrowed and left to decompose
7.2 Pesticides are used in ways that do not endanger health of	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	Merotai SOU 30 continued to use agrochemicals based on its Agricultural Reference Manual (ARM) Section 15 and 16, SSOP and Pictorial Safety Standard Book (PSS) where written justifications had been provided for various fields operations. The Manual has included a chemical register list which indicates the use of selective products that are

Clause	Indicators	Comply Yes/No	Findings
workers, families, communities or the environment.			specific to the target pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs. All the 4 estates confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000. a) The review of the chemical register concluded that all pesticides used were of Class II, III & IV. The use of paraquat had been prohibited in all SDP estates. b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. The chemical used in the estate captured from the chemical register updated on 13/01 2022. Among others as listed below;
			Chemical name Class Chemical name Class Chemical name Class Glyphosate isopropylamine Glyphosate isopropylamine Glyphosate isopropylamine Class Triclopyr butoxy e/ester III Canyon 20G IV Triclopyr butoxy III Metsulfuron methy 20% w/w III Cypermethrin III Tournon 20G IV A Metsulfuron methy 20% w/w III Tournon 20G IV A Metsulfuron methy 20% w/w III Tournon 3-(alpha acetonylbenzyl)-hydroxycoumarin
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	sh pe ai ch pi	All 4 Estates, Merotai Estate, Table Estate, Tiger Estate and Imam Estate had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and Ai/Ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. all estates had documented programs for spraying pesticides and for rat baiting.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Yes	Merotai SOU 30 were committed to minimise the usage of agrochemicals by implementing Integrated Pest Management (IPM) plans. Blanket spraying was not practised by this SOU and soft grasses maintained in the field. It had also been the practice that pesticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section 15 -Plant Protection and that no prophylactic use of such pesticides would be permitted. As part of the IPM plans, the quantity of pesticides required for various field conditions are documented and justified in Sime Darby Plantation Berhad Agriculture Reference Manual (ARM) Section 16.5. The implementation in the field were consistent with the ARM and the following practices were adopted by the estates; a) Established growth of beneficial plants (Cassia cobanensis, Antigonan leptopus and Tunera subulata) to attract natural predators and reduce use of insecticides.

Clause	Indicators	Comply Yes/No	Findings
			During the site visit the auditor observed notable quantity of beneficial plants been planted at average rate of 5.0m/ha. b) The estates in order to reduce the use of pesticides to control rats, Barn Owls (Tyto alba) was encouraged, as indicated by Barn Owl census records. The current ratio is maintained at 1 box/ 10 ha as per the ARM guidelines. In Merotai Estate, Table Estate, Tiger Estate and Imam Estate there were 10,12,11 and 27 Barn Owl Boxes(BOB) respectively. c) In replants of 2019, 2020 and 2021 prophylactic spraying using diluted Cypermethrin for immature palms was carried out against Rhinoceros Beetles as per SOP and the EFB were applied in single layers and is not dumped in large amounts to prevent breeding of Rhinoceros Beetles.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	Yes	Merotai SOU 30 only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Reg. 2000. From the review of the chemical register, it was noted that all pesticides used were of Class II, III & IV. The use of paraquat had been banned in all Sime Darby Plantation Berhad Estates since 07/11/2006. There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. From records and interviews with workers, staff and estate assistants, found that they were trained, all precautions taken and all legal requirements met. There was no evidence of prophylactic use of pesticides in Merotai SOU 30 except in immature and young fields, where prophylactic spraying using diluted Cypermethrin are still practised for the Pest and Diseases management such as control of Rhinoceros Beetle as per SOP.
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	Yes	Merotai SOU 30 only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register, it was noted that all pesticides used are of Class II, III & IV. The use of paraquat had been banned in all Sime Darby Plantation Berhad estates since 07//11/2006. There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions had been used. Methamidophos a was used in 2015 for trunk injection to treat bagworm attack. Since 2016, Sime Darby Plantation Berhad had replaced the usage of Methamidophos a Class 1A chemical to Acephate a Class III chemical. Signboards indicated 'AWAS Dilarang Masuk', block, dates of operation, type of operation and chemical were used were displayed.
	7.2.5a Judgment of the threat and verify why this is a major threat.	Yes	As mentioned above in 7.2.5.of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had not been

Clause	Indicators	Comply Yes/No	Findings
			used. Hence, the need for a judgment of the threat assessment does not apply on the Merotai SOU 30.
	7.2.5b Why there is no other alternative which can be used.	Yes	As mentioned above in 7.2.5.of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had not been used. Hence, the need for a judgment of the threat assessment does not apply on the Merotai SOU 30.
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Yes	As above
	7.2.5d What is the process to limit the negative impacts of the application.	Yes	As above
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Yes	As above
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	Yes	The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that SDS are available at all sites during the audit. Trainings on pesticide handling were available in all the visited estates. The training included the safety aspects and usage of PPE when handling with pesticides.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	Yes	The storage of pesticides at Merotai SOU 30 was found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorized personnel i.e. storekeeper. The stores in estate and mill were ventilated (equipped with exhaust fans). All the chemicals were arranged/segregated according to the type. During site visit in the estates i.e. chemical and fertilizer store, sighted relevant SDS were displayed. Adequate safety signage has been placed at both internal and external of the building. A proper premixing area with eye wash facilities and bathing area is available near to the chemical stores. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. This is to avoid any contamination of chemicals onto the ground. Triple rinsing activities continued to be implemented for empty pesticide

Clause	Indicators	Comply Yes/No	Findings
			containers. The detailed procedure for this purpose is available in SOP for Scheduled Wastes Management and SOP for Triple Rinsing.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Yes	Empty pesticide containers was punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Inventory and consignment documents verified for confirmation of proper management and disposal. The scheduled wastes generated at Merotai SOU 30 not more than 180 days @ 20mt.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	Yes	Aerial spraying is not a practice in Merotai SOU 30. There was no evidence to show that such a method being used in the 4 Estates. This was also supported through interviews with executives, field staffs and workers. No such activities being witnessed during the site/field visit.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Yes	All sprayers, manurers and workshop technician were sent for annual medical surveillance and from the results, all workers fit to handle chemical.
	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 estates complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation whereby no work with pesticides is given to pregnant or breast-feeding women. <i>Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan)</i> . During site visits there was no breastfeeding women and under age of 18 workers involved in chemical applications. All estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	Yes	The organization had established yearly waste management plan with latest updated in January 2022. Among the plan been included and established were: Scheduled waste – Dispose by license contractor Domestic Waste – Disposed by license contractor Recyclable waste – Recycle and collect by contractor Sighted during site visit, all waste identified had been manage accordance to company plan.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is	Yes	Procedure and implementation in place.

Clause	Indicators	Comply Yes/No	Findings
	demonstrated.		
	7.3.3 The unit of certification does not use open fire for waste disposal.	Yes	During site visit at all estates, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at Merotai CU have been disposed via local municipal council.
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	Merotai SOU 30 continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer recommendations. Maintaining soil fertility is guided by its SOPs in a few chapters: Maintaining soil fertility is guided by a few chapters: Maintaining soil fertility is guided by a few chapters: EOMS chapter B8 – Leguminous Cover Crops ARM Section 8- Manuring Fertilizer application, which was of paramount importance for maintenance of soil fertility, were carried out based on the recommendation made by the Chief Agronomist II from Sime Darby Research Sdn. Bhd. Annual fertilizer recommendations were made based on annual foliar sampling while soil samplings were carried out on a 5 year cycle basis last. The recommendations by the Agronomist were also available during the inspection and the application of fertilizers had been carried out as recommended and scheduled. Noted from the records that the actual amount of fertilisers applied in 2021 were completed. Fertiliser application program was monitored using records like program sheets, bin cards, Field Cost book and Manuring Structured Block Supervision (MSBS) forms.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	Yes	The periodic tissue and soil sampling were carried out in the estates to monitor changes in nutrient status. Annual fertilizer recommendations were made based on annual foliar sampling, Merotai Estate, Tiger Estate and Imam Estates respectively. The 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.
	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	Merotai SOU 30 had a nutrient recycling strategy where palm fronds were properly stacked in the interrow to decompose. EFB was applied 30 mt/ha in mature and 40 mt in immature oil palm areas. It was applied on the stacked palm fronds in the mature areas while for immature palm was applied in the circles. EFB will help to supplement the inorganic fertilizer thus improving the nutrient status of the field.
	7.4.4 Records of fertiliser inputs are maintained.	Yes	Merotai SOU 30 continued to monitor their fertilizer inputs as recommended by their Principal Agronomist II, from Plant Nutrition and Protection, Sime Darby Research Sdn. Bhd who visited all the 4 estates during the annual foliar sampling. Fertiliser application program was monitored using records like manuring master plan, program sheets, bin cards, field cost book, manuring audits by Planning and Monitoring Department under Upstream Department from headquarters. Records of programs and applications of fertilisers were made available to auditors.

Clause	Indicators	Comply Yes/No			ndings	
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.	al and Yes	soils in Merotai SOU (Precision Agriculture	30 The Soil maps are	prepared by SDP Re	that no fragile or marginal search and Advisory Dept
			Table Estate	Merotai Estate	Tiger Estate	Imam Estate
			Table	Kinabutan	Table	Brantian
			Mai	Mai	Bombalai	Weston
			Apas	Table	Kg Pusu	Apas
			Kinabutan	Kechor	Tiger	Dagat
			Dagat	Dagat	Kinabatun	Table
			Bombalai	Lubok Kiat	Kechor	Kinabatangan
			Kawa	Jarangan		Sapi
				Gong chenak		Kinabutan
				Bukit Tuku		
				Tebok		
				Apas		
				Bombalai		
				Rasau		
				Hasau		
	7.5.2 No replanting on steep slopes (above 25 degress) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	Yes	erosion and degrada guided by: Slope & Riv. Buffer Zone Land Prepail the was observed that (greater than 25°) land the were in place through spraying, construction interlines. Cover crop Mucuna bracted with Nephrolepis bise	er Protection Policy & 25 degree slope and ration for Terracing in A tt no replanting of any ger than 25 Ha within the practices to minimise gh proper stacking of n of terraces, road mai powere planted in the ata had been planted a perrata in the inter rows	d in item 8 Section 4 ARM Manual. y individual, contiguous he SOU. e and control erosion fronds, EFB application national mainter replants and in some long some slopes by revere sighted during the	
	7.5.3 There is no new planting of oil palm on steep terrain.	Yes				es to minimise and control to new planting of oil palm

Clause	Indicators	Comply Yes/No	Findings
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	Yes	Merotai SOU 30 had a management strategy for palm oil cultivation, taking into account the soil maps and surveys identifying marginal and fragile soils, including steep terrain for the palm oil long term suitability. Soils maps prepared in Jan 2011 by the Precision Agriculture Unit of Sime Darby Research unit shows that there are no fragile soils in all Estates. During the field visit and the soil maps provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in Merotai SOU 30.
the results are incorporated into plans and operations.	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	Yes	The Soils maps prepared in Jan 2011 by the Precision Agriculture Unit of Sime Darby Research unit shows that there are no fragile soils in all Estates in Merotai SOU 30. Hence, the extensive planting on marginal and fragile soils, does not apply on the Merotai SOU 30.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Yes	The management of all Estates in Merotai SOU 30 continued to use Soil surveys and topographic information guide in the planning of drainage and irrigation systems, roads and other infrastructure. Soils maps prepared in Jan 2011 and the Slope maps prepared on 19 April 2018 Precision Agriculture Unit of Sime Darby Research unit were used. On all Estates in Merotai SOU 30 and Slope Maps prepared by the R&D – Precision Agriculture Unit (VS) were available. The slopes were classified as 0° - 2°, 2° - 6°, 6° - 12°, 12° - 20°, 20° - 25° and > 25°.
7.7 No new planting on peat, regardless of depth after 15	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	Based on the soils maps dated January 2011 prepared by the R&D – Precision Agriculture Unit and site visits there are no peat soils on all estates. Hence, this requirement is not applicable.
November 2018 and all peatlands are managed responsibly.	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	Yes	Based on the soils maps dated January 2011 prepared by the R&D – Precision Agriculture Unit and site visits there are no peat soils on all estates. Hence, this requirement is not applicable.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	Yes	Based on the soils maps dated January 2011 prepared by the R&D – Precision Agriculture Unit and site visits there are no peat soils on all estates. Hence, this requirement is not applicable.

Clause	Indicators	Comply Yes/No	Findings
			It has been confirmed that SOU Merotai did not have peat land. It is consistent with the new soils map provided by Precision Agriculture Unit (NHM) of Sime Darby Research. Hence, this requirement is not applicable.
	7.7.4 (C) A documented water and ground cover management programme is in place.	Yes	Based on the soils maps dated January 2011 prepared by the R&D – Precision Agriculture Unit and site visits there are no peat soils on all estates. Hence, this requirement is not applicable.
	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 ii 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	Based on the soils maps dated January 2011 prepared by the R&D – Precision Agriculture Unit and site visits there are no peat soils on all estates. Hence, this requirement is not applicable.
	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	Based on the soils maps dated January 2011 prepared by the R&D – Precision Agriculture Unit and site visits there are no peat soils on all estates. Hence, this requirement is not applicable.
	7.7.7 (C) All areas of unplanted and set- aside peatlands in the managed area	Yes	Based on the soils maps dated January 2011 prepared by the R&D – Precision Agriculture Unit and site visits there are no peat soils on all estates. Hence, this requirement is not

Clause	Indicators	Comply Yes/No	Findings
	(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.		applicable.
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	Water management plan at all the sampled mill and estates were in place and implemented as verified through records of Water Management Plan FY 2022. Generally, the plan was established to focus on minimizing waste and pollution prevention of water sources. Among the action plans are rainwater harvesting, monitoring of pipeline leakage, and establishment of buffer zones at rivers and other water bodies. Workers of all the sampled estates have adequate access to clean water which were supplied through water treatment plant.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Yes	The continued availability of water sources and to avoid negative impacts on other users in the catchment has been conclude in the Environmental Compliance Report (ECR) was conducted by third party consultant.
	7.8.1b Workers have adequate access to clean water.	Yes	In order to ensure supply of clean drinking water to workers treated water sampling was carried out by monthly basis. Drinking water quality has been monitored by Sime Darby Plantation Research Sdn. Bhd. Results from analysis were showed all the parameters within the limits. Based on the result, water quality monitoring is generally within Class IIB of NWQSM at all monitoring points.
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	No	During site inspection at buffer zone area, Merotai Estate (Block P19C between P07K) and Tiger Estate (Block P21C), sighted trace of spraying of agrochemicals was carried out at the area. As a result, Major NCR DA 01 2022 was raised. Furthermore, artificial drainage and waterways channels directly to watercourse, the best practices should be enhanced according to RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is	Yes	The organization had regularly monitored and reported effluent parameter to DOE.

Clause	Indicators	Comply Yes/No		Fi	indings	
	regularly monitored.					
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	Yes		ll water usage been co		
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	updated in May 2022 were: 1.Scheduled mainten 2.Awareness to empl 3.Ensure nozzle is al	 Among the strategien nance for machineries loyee on reduce fuel uways locked to avoid uways 	s been plan and e and vehicles. sage unauthorized diese	uel Reduction Plan with latest executed by the operating units el filling
7.10 Plans to reduce pollution and emissions, including	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	Yes	emissions. For input		sends to RSPO	as a tool to calculate the GHG on 13/06/2022. The input data
greenhouse gases	GHG calculator and publicly reported.		Description	tCO₂e/tProduct		
(GHG), are developed,			СРО	0.51		
implemented and			PK	0.51		
monitored and new developments are					1	
designed to minimise			Production	t/yr		
GHG emissions.			FFB Processed	237,663.26		
			CPO Processed	51,104.90		
			Land Use		На	
			OP Planted on Miner	al Soil	10,450.00	
			OP Planted on Peat S	Soil	0.00	
			Total oil palm planted	d area	10,450.00	
			Conservation (foreste	ed)	0.00	
			Conservation (non-fo	rested)	161.23	
			Milling extraction rate:			
			OER	21.50		
			KER	4.93		

Clause	Indicators	Comply Yes/No		Fir	ndings		
			Mill Emission				
			Emission source		tCO2e	tCO2e/tFFB	
			POME		0.00	0.00	
			Fuel consumption		413.54	0.00	
			Grid electricity utilisation		0.00	0.00	
			Credits		[
			Export of excess electricity to hou	ising &	-2727.38	-0.01	
			grid Sale of PKS		0.00	0.00	
			Sale of EFB		0.00	0.00	
			Total		-2727.38	-0.01	
			Total	l	-2121.30	-0.01	
			Plantation / field emission				_
					Own		
			Emission sources	tCO2e	tCO2e/h		
			Land Conversion	103210.7		.88 0.64	
			CO2 Emissions from Fertiliser N2O Emissions from Peat	9704.7 0.0		.93 0.06 .00 0.00	
			N2O Emissions from Fertiliser	5527.1	-		
			Fuel Consumption	1742.6		.17 0.01	
			Peat Oxidation Sinks	0.0	0 0.	.00 0.00	-
			Crop Sequestration	-97400.5	0 -9	.32 -0.61	-
			Conservation Sequestration	0.0		.00 0.00	
			Total	22784.8		.18 0.14	
			Palm Oil Mill Effluent (POME) Treatr	ment			
			Diverted to o	compost			0%
			Diverted to anaero	obic digestion		1	00%
			Diverted to Anaerobic Digestion	-	-		
			Diverted to anae	erobic pond			0%
			Diverted to methane				32%
			Diverted to methane capture	e (electricity g	eneration)		68%
	7.10.2 (C) Starting 2014, the carbon stock	Yes	Auditor has verified through of Estate Maps and also through si				ı, Google Maps,

Clause	Indicators	Comply Yes/No	Findings
	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).		Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Merotai 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	The Environmental Aspect Impact Assessment and Pollution Prevention Plan was used to identify the GHG emissions. Some of the Greenhouse Gas emissions are through Land Conversation, Crop Sequestration, Fertiliser, N ₂ O from fertiliser, Fuel Consumption, Peat Oxidation. Plans to reduce or minimise them are in place. Merotai CU also plan to reduce GHG via Biogas plant at Merotai POM to capture Methane gas generated from the Effluent Treatment Plant to generate biogas engine to produce electricity for mill and domestic use. Mitigation measure of leakage or spillage of chemical/oil implement as per pollution prevention plan to avoid negative impact to the environmental issues. During site inspection at replanting area Tiger Estate, sighted diesel/lubricant/hydraulic drum contain by metal trays
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	Merotai CU fulfilled to the strict Zero Burning in the Group Sustainability & Quality Policy Statement dated 02/12/2019 under Responsible Agriculture Charter (RAC) point 3.2.5. There was no evidence to show that fire had been used for preparing land for replanting in the year 2021 and 2022 replant visited in Table Estate during the audit. It was also observed that all palms were felled, shredded, windrowed and left to decomposed.
	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 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 dated 29/12/2021 that was carried out at Merotai CU, all stakeholders including neighbour was briefed on fire prevention and control measures.
7.12 Land clearing does not cause deforestation or damage any area	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	Yes	No new land clearing since Nov 2015 available at SOU Merotai, thus this Indicator was not Applicable.

Clause	Indicators	Comply Yes/No	Findings
required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (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.		
forest. HCVs and HCS forests in the managed area are	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	Yes	The report of "HCV Re-Assessment for Strategic Operating Unit (SOU) Sabah Central – South Zone" prepared by the PSQM Department was available to the audit team. The report was completed in January 2014 had covered all the High Conservation Value (HCV)
identified and protected or enhanced.	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	within and adjacent to the CU. The HCV assessment had identified 4 potential HCV in the Merotai CU. The CU observed to maintain its identified HCVs, i.e. natural pond and remnant forest patch ("Bukit Tiger" in Tiger estate), natural pond (in Merotai Estate) and Water Catchment (Table Estate) respectively. The CU has also identified a one big tree name Menggaris (Koompassia Excelsia) as a HCV area within the Table Estate. Total hectarage for HCV area at SOU Merotai is 23.72ha as per "HCV Re-Assessment for Strategic Operating Unit
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	Yes	(SOU) Sabah Central – South Zone" However SOU Merotai management decide to declare their HCV area 161.23 ha to include the Buffer Zones and Planted area > 25 degree into the Conservation area and reported to CB.
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider	Yes	There was no RTE observed present in the SOU in the assessment. The CU had a regular programmes 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. 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. In general, the action plan has been implemented accordingly.

Clause	Indicators	Comply Yes/No	Findings
	landscape level considerations (where these are identified).		
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	Yes	HCV Re Assessment has been done on April 2014, but no rights of local communities have been identified in HCV areas. Thus this indicator was not applicable.
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	Yes	In all 4 estates, the training programs for 2022 has included HCV training programme. HCV briefing were carried out during muster. Attendance lists were available. SOU Merotai management will notify the relevant authorities immediately if any individual working for the company is found to capture, harm, collect or kill these species. This training and implementation will further verify during On site audit. 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.
	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. During the field audit, there was no presence of RTE in the areas found and the monitoring records also confirmed that no significant outcomes detected. On-going monitoring of the HCV area at Merotai Estate and Tiger 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 Certifications Systems for P&C and RISS, Nov 2020

Clause	Indicators		Findings
Time-bound plan 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.	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSP membership. Any new acquisitions shall be certified within a 3-year timeframe. And deviations from these maximum period requires approval by the RSPO Secretariat.) ;	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. Indonesia Operations – as of January 2022 PT Bahari Gembira Ria Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servlet.FileDow nload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P9000001OioYJEAZ PT Sandika Natapalma Only Karya Palma Estate yet to be certified - Pending confirmation from Badan Pertanahan National (BPN) on Hak Guna Usaha (HGU) Document. PT Budidaya Agro Lestari Only Beturus (PT BAL) Estate yet to be certified – HGU obtained as per May 2018. However never been released by BPN. PT Guthrie Pecconina Sg Jernih Estate and KKPA was separated in 2022 and recorded separately. 890.98 Ha – still under Land legalisation process and process Kadastral. PT Sime Indo Agro 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. PT Bina Sains Cemerlang Sungai Pinang Estate & Bukit Pinang Estate yet to be certified – Land legalisation process for 308.35 ha is still in process. Liberia Operations – as of January 2020

				As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI). http://www.simedarbyplantation.com/media/press-releases/simedarby-plantation-completes-divestment-of-its-liberia-operations New Britain Palm Oil (NBPOL) Operations – as of March 2021 Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd. 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.
	(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
5.5.3	(a)	No replacement of primary forest or any area	Yes	Verification through www.globalforestwatch.com, GOOGLE maps

Requirements for uncertified management units:		required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. Any new plantings since 1st 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;		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.
		 A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self- 	Yes	No critical (Major) non-compliance raised against any of the RSPO P&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. Respective sites-maintained stakeholder engagements as part of

			1
	assessment against each requirement;		the estates/mills operations. Especially in Indonesia, socialization of company.
	 Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 	Yes	For TBP dated March 2021, there was several CUs located in Indonesia and 1 unit in Papua New Guinea (NBPOL) not yet completed. Summarized as below:
	Desktop study e.g. web check on relevant complaints	Yes	Land legalization – PT Guthrie Pecconina, PT Bina Sains Cemerlang, PT Sime Indo Agro (INA)
	 If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any 	Yes	Surat perijinan in progress (Jadual Pematuhan) – PT Sandika Natapalma/PT Budidaya Agro Lestari (INA)
	non-compliance with the requirements.		NPP – Markham Farming & Markham Agro (NBPOL)
(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	Sold off – PT Mitral Austral Sejahtera (INA), Sime Darby Plantation Grand Cape Mount (Liberia).
(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	

5.6.6 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.	No additional indicators	Yes	As it has been mentioned in 4.4.1 of this checklists. The legal ownership and the maps to indicate the boundary stone were sighted at Merotai, Table, Imam and Tiger Estate. The Land Title for All Estate has been verified, for all Estate (Merotai, Table, Imam, Tiger and POM), all the land title is originally from Borneo Abaca Limited and company has change their names to Bal Estates Sdn Bhd on 13/8/1985. The company has bought the land from Colony of North Borneo (Sabah Govt) on 4 th January 1937. The company then merge with Golden Hope Plantations (Sabah) Sdn Bhd on 14/11/1996. And soon after that, Golden Hope has merge with Sime Darby on 1/7/2008.
The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.			
The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.			

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
MAR 01 2022 3.8.7	Major	Finding: The site did not inform the CB on projected overproduction of certified tonnage for FFB production at KKS Merotai. Objective evidence: Based on documentation review on Mass Balance template, period Aug 2020 – May 2022, there was over production of FFB production as follows: Projected FFB: 268,916.48 Mt Actual FFB: 273, 747.50 Mt Variace: +4,831.02 Mt	Root cause: Overproduction of certified tonnage of FFB since delay certification process due to MCO and the extension period has been given for 22 month without extending the volume of FFB. Mill has submitted the FFB volume extension to Group Sustainability and notice the PIC was resigned and the case bot been proceed further. Action taken has been made by mill executive with forwarding the email to respective PIC on 10 th June 2022 and on 21 June 2022 mill had received the CSPO/CSPK & FFB volume extension.	Sighted refresher training on RSPO SC and accounting system to mill representatives conducted. Status:Closed.
			Corrective Action: 1.Monitor the CSPO/CSPK & FFB every 3 months by using mass balance template and daily production report. 2.To request extension volume immediately and provide all data & PIC inform the CB for extension. 3.Continously communicate (every 3 days) once application submit with the PIC and CC the email to all responsible parties so everyone can alert the status of application. 4.Refresher training on SCCS and mass balance template.	
DA 01 2022 7.8.2	Major	Finding: Water courses and wetlands was not protected, including not maintaining appropriate riparian and other buffer zones. Objective evidence: During site inspection at buffer zone area, Merotai Estate (Block P19C between P07K) and Tiger Estate (Block P21C), sighted trace of spraying of agrochemicals was carried out at	Root cause: There is chemical spillage during sprayer movement with chemical pump across the wooden culvert next to buffer zone. Corrective Action: Immediate briefing and training to all	Sighted training for sprayer from Merotai and Tiger estate conducted on awareness on the buffer zone ad spray activities. Status: Closed

		the area.	sprayers and relevant workers.	
MZK 01 2022 5.2.1	Minor	Finding: SOU Merotai 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. Objective evidence: Sighted Records of RSPO briefing with interested smallholders during the Stakeholder meeting dated 29/12/21 at SOU Merotai, 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.	Root cause: No proper engagement made with smallholders due to limited information and awareness Corrective Action: To develop smallholders support program and consultation with smallholder to improve their livelihood To organize an engagement session with smallholders.	Status : open Will be verify in next audit.
MZK 02 2022 5.2.2	Minor	Finding: SOU Merotai 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). Objective evidence: Sighted Records of RSPO briefing with interested smallholders during the Stakeholder meeting dated 29/12/21 at SOU Merotai, 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.	Root cause: No proper engagement made with smallholders due to limited information and awareness Corrective Action: To develop smallholders support program and consultation with smallholder to improve their livelihood To organize an engagement session with smallholders.	Status : open Will be verify in next audit.

ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
2.1.1 MAR 01 2020	Major	Finding: Non- compliance against Sabah Labor Ordinance Chapter XIA Employment of Women – Prohibition of Night Work. (Section 75 (1) SLO). Objective evidence: During Site visit and Document review of attendance card at Merotai POM, it was found that female workers who is working at weighbridge are working more than 10.00 pm on 16,17, 30 Jun and 3, 27 of July 2020 without written approval from authority. It contravenes with Sabah Labor Ordinance Chapter XIA Employment of Women – Prohibition of Night Work. (Section 75 (1) SLO).	 Mill management have informed dispatch tankers that they will not allow late arrival of tankers and informed auxiliary police at mill entrance to not allow any late arrival of tankers. Mill management have reminded female weighbridge operators to punch-out before 10 p.m. as it is incompliance to SLO. Any re-occurrence of such incidence will proceed with disciplinary action. Mill executive Tn. Mohd Pahmi will be incharge to monitor compliance of above actions. On long term corrective action, Merotai Mill will obtain JTK Approval for female worker night work. Mill have submitted a follow up letter on the earlier application on 26 August 2020. 	Auditor received the evidence training has been given to all dispatch tankers, women workers including weighbridge workers and AP dated 25/9/2020. And management already prohibit women workers from night work until get approval from JTK. Auditor also received evidence follow up letter to JTK dated 26/8/2020 and another email dated 2/11/20, but JTK only reply through call stated that they couldn't renew the License due to MCO and election and will get back after MCO release. Status: Closed The effectiveness of implementation will be verified during next audit

ATTACHMENT 6 – Timebound Plan

1) 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
		Sungai Dingin Oil Mill	-		Certified		
		Anak Kulim Estate	-		Certified		
		Sungai Dingin Estate	-		Certified		
	On Dissels	Somme Estate	-		Certified	40 4 40	
1	Sg. Dingin	Bukit Selarong Estate	-	Karangan, Kedah	Certified	12-Aug-10	
		Padang Buluh Estate	-		Certified		
		Bukit Hijau Estate	-		Certified		
		Jentayu Estate	-		Certified		
		Chersonese Oil Mill	-		Certified		
	Chersonese	Chersonese Estate	-	Kuala Kurau, Perak	Certified	5-Oct-11	
2		Kalumpong Estate	-		Certified		
		Tali Ayer Estate	-		Certified		
		Holyrood Estate	-		Certified		
		Elphil Oil Mill	-		Certified		
0	El-leil	Kamuning Estate	-	On Chart Bands	Certified	40 1 44	
3	Elphil	Elphil Estate	-	Sg Siput, Perak	Certified	18-Jun-11	
		Kinta Kellas Estate	-		Certified		
		Flemington Oil Mill	-		Certified		
		Flemington Estate	-	Tabili latan Danal	Certified		
4	Flemington	Bagan Datoh Estate	-	Teluk Intan, Perak	Certified	5-Oct-11	
		Sabak Bernam Estate	-		Certified		
		Sg. Samak Estate	-		Certified		

		1		1			
		Seri Intan Oil Mill	-		Certified		
		Selaba Oil Mill	-		Certified		
		Seri Intan (+ Selaba) Estate	-		Certified		
5	Seri	Sabrang Estate	-	Teluk Intan, Perak	Certified	3-Mar-11	
	Intan/Selaba	Sogomana Estate	-	ŕ	Certified		
		Sg. Wangi Estate	-		Certified		
		Bikam Estate	-		Certified		
		Cluny (+ Bedford) Estate	-		Certified		
		Tennamaram Oil Mill	-		Certified		
_	_	Tennamaram Estate	-	Bestari Jaya,	Certified	0.14	
6	Tennamaram	Sungai Buluh Estate	-	Selangor	Certified	3-Mar-11	
		Bukit Talang Estate	-		Certified		
		Bukit Kerayong Oil Mill	-		Certified		
_	51.16	Bukit Kerayong Estate	-		Certified	l . <u>.</u>	
7	Bkt Kerayong			Kapar, Selangor		15-Apr-11	
		Bukit Cheraka Estate	-		Certified		
		East Oil Mill	-		Certified		
		East Estate	-	Carey Island,	Certified	40.84	
8	East	Sepang Estate		Selangor	Certified	19-May-10	
		Dusun Durian Estate	-		Certified		
_		West Oil Mill	-	Carey Island,	Certified		
9	West	West Estate	-	Selangor	Certified	19-May-10	
	1						
10	Duddik Dukani	Bukit Puteri Oil Mill	-	Davih Daham	Certified	7 1 44	
10	Bukit Puteri	Bukit Puteri Estate	-	Raub, Pahang	Certified	7-Jul-11	
11	Kerdau	Kerdau Oil Mill	-	Temerloh, Pahang	Certified	7-Jul-11	
' '	Nordad	Kerdau Estate	-		Certified	, 00. 11	Jentar Estate has merged with Kerdau
		Mentakab Estate	-		Certified		Estate and reported to the CB in March/April 2021.
		Chenor Estate	-		Certified		
		Sg Mai Estate	-		Certified		
	t .	1				1	L .

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40		Jabor Oil Mill	-	D.	Certified	7 1 144	
12	Jabor	Jabor Estate	-	Kuantan, Pahang	Certified	7-Jul-11	
13	Labu	Labu Oil Mill	-	Nilai, Negeri	Certified	30-Dec-11	New Labu Estate has became a division
13	Labu	Labu Estate	-	Sembilan	Certified	30-Dec-11	of Labu Estate.
		Tanah Merah Oil Mill	-	D . D	Certified		
14	Tanah Merah	Tanah Merah Estate	-	Port Dickson, Negeri Sembilan	Certified	19-May-10	
		Bukit Pelandok Estate	-	regen ochlollan	Certified		
		Sua Betong Oil Mill	-		Certified		
		Sua Betong Estate	-		Certified		
		Sengkang Estate	-		Certified		Siliau Estate has now been merged into
15	Sua Betong	Bradwall Estate	-	Port Dickson,	Certified	18-Feb-14	Salak Estate and Bradwall Estate.
15	Sua belong	PD Lukut Estate	-	Negeri Sembilan	Certified	10-Feb-14	
		Tampin Linggi Estate	-		Certified		
		Sg. Bahru Estate	-		Certified		
		Salak Estate	-		Certified		
	T	1	T	T T		T	
		Kok Foh Oil Mill	-		Certified		Ca. Camaa Fatata haa mayy haan maggad
		Muar River Estate	-		Certified		Sg. Gemas Estate has now been merged into Sg Senarut Estate
		Sg. Senarut Estate + Sg Gemas Estate	-		Certified		and og contact Island
16	Kok Foh	Kok Foh Estate	-	Bahau, Negeri Sembilan	Certified	7-Jul-11	
		Bukit Pilah Estate	-	Sembilan	Certified		
		St. Helier Estate	-		Certified		
		Sungai Sabaling Estate	-		Certified		
		Pertang Estate	-		Certified		
		Kempas Oil Mill	-		Certified		
		Kempas Estate	-		Certified	20-May-10	Carkam Fatata provinces tram
17	Kempas	Tangkah Estate	-	Jasin, Melaka	Certified		Serkam Estate, previously from SOU18(Diamond Jubilee) is now part of
		Kemuning Estate	-		Certified		SOU 17(Kempas)
		Serkam Estate	-		Certified		

				•			
	Diamond	Diamond Jubilee Palm Oil Mill	-		Certified		Serkam Estate, previously from SOU18(Diamond Jubilee) is now part of
18		Diamond Jubilee Estate	-	Jasin, Melaka	Certified	5-Oct-11	SOU 17(Kempas).
	Jubilee	Bukit Asahan Estate	-		Certified		Welch Estate, previously from SOU 19(Pagoh) is now part of SOU
		Welch Estate	-		Certified		18(Diamond Jubilee)
		Pagoh Oil Mill	-		Certified		
19	Pagoh	Pagoh Estate	-	Muar, Johor	Certified	28-Jan-14	
	Payon	Lanadron Estate	-	iviual, Johor	Certified	20-Jan-14	
		Pengkalan Bukit Estate	-		Certified		
		Chaah Oil Mill	-		Certified		
00	Chaab	Chaah Estate	-	Ohaah Jahar	Certified	10 Nov 10	
20	Chaah	Sg. Simpang Kiri Estate	-	Chaah, Johor	Certified	18-Nov-10	
		North Labis Estate	-		Certified		
		Gunung Mas Oil Mill	-		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
		Gunung Mas Estate	-		Certified		
21	Gunung Mas	Kempas Klebang Estate	-	Kluang, Johor	Certified		
		Bukit Paloh Estate	-		Certified		
		Yong Peng Estate	-		Certified		Scope of SOU Gunung Mas in 2018.
		Bukit Benut Oil Mill	-		Certified		* SDP acquired Talisman Estate in Johor
		Bukit Benut Estate	-		Certified		in April 2017. Talisman Estate is merged
22	Bukit Benut	Lambak Elaeis Estate	-	Kluang, Johor	Certified	5-Oct-11	into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the
	Bukit Beriut	CEP Nyior Estate	-	Tridang, Johon	Certified	3-001-11	RSPO. Certification Scope of SOU Bk Benut in 2018.
		T =	<u> </u>	T		T	1
		Ulu Remis Oil Mill	-	-	Certified	- 11-Apr-11	
	23 Ulu Remis	Ulu Remis Estate	-	-	Certified		
23		Cenas Estate	-	Layang-layang,	Certified		
		Bukit Badak Estate	-	Johor	Certified		
		Tun Dr. Ismail Estate	-	-	Certified		
		Pekan Estate	-		Certified		

		Sembrong Estate	-		Certified		
		Hadapan Oil Mill	-		Certified		
		Sri Pulai Estate	-		Certified		
24	Hadapan	Kulai Estate	-	Layang-layang,	Certified	29-Mar-11	
	'	Layang Estate	-	Johor	Certified		
		CEP Renggam Estate	-		Certified		
		Sandakan Bay Oil Mill	-		Certified		
		Tun Tan Siew Sin Estate	-		Certified		
00	Canadalian Davi	Tunku Estate	-	Canalakan Cahah	Certified	1 0-1 00	
26	Sandakan Bay	Tigowis Estate	-	Sandakan, Sabah	Certified	1-Oct-08	
		Sentosa Estate	-		Certified		
		Segaliud Estate	-		Certified		
		Melalap Oil Mill	-		Certified		
27	Melalap	Melalap Estate	-	Tenom, Sabah	Certified	21-Jan-11	
		Sapong Estate	-		Certified		
		Binuang Oil Mill	-	Kunak, Sabah	Certified	16-Jan-09	
		Binuang Estate	-		Certified		
28	Binuang	Sungang Estate	-		Certified		
		Tingkayu Estate	-		Certified		
		Jeleta Bumi Estate	-		Certified		
		T	T	Т		Т	
		Giram Oil Mill	-		Certified		
29	Giram	Giram Estate	-	Kunak Sabah	Certified	16-Jan-09	
		Mostyn Estate	-		Certified		
		Merotai Oil Mill	-		Certified		
		Merotai Estate	-		Certified		
30	Merotai	Imam Estate	-	Tawau, Sabah	Certified	16-Jan-09	
		Tiger Estate	-		Certified		
		Table Estate	-		Certified		
		Lavang Oil Mill	-		Certified		
31	Lovene	Lavang Estate	-	Pintulu Carawali	Certified	30-Dec-11	
्र ।	Lavang	Rasan Estate	-	Bintulu, Sarawak	Certified	30-Dec-11	
		Belian Estate	-		Certified		

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		Kelida Estate	-		Certified		
		Lavang (Special) Estate	-		Certified		
		Pekaka Estate	-		Certified		
		Ruai Estate	-		Certified		
		Dulang Estate	-		Certified		
		Charquest Estate	-		Certified		
		Paroh Estate	-		Certified		
		Rajawali Oil Mill	-		Certified		
		Rajawali Estate	-		Certified		
32	Rajawali	Samudera Estate	-	Bintulu, Sarawak	Certified	30-Dec-11	
		Semarak Estate	-		Certified		
		Bayu Estate	-		Certified		
		Derawan Oil Mill	-		Certified		
		Derawan Estate	-		Certified		
33	Derawan	Sahua Estate	-	Bintulu, Sarawak	Certified	30-Dec-11	
		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.

2) 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	Alur Dumai Mill	-	Rokan Hilir	Rokan Hilir	Certified	16-Jan-12	
ı	Sakti	Alur Dumai Estate	-		District – Riau	Certified	16-Jan-12	
		Mustika Mill	-		Tanah Bumbu	Certified	3-Jul-13	
2	PT Sajang	Mustika Estate	-		District –	Certified	3-Jul-13	
	Heulang	Pantai Bonati Estate	-		South Kalimantan	Certified	6-Jul-11	
	PT	Angsana Mill	-		Tanah Bumbu	Certified		
3	Ladangrumpun	Angsana Estate	-		District –	Certified	6-Jul-11	
	Suburabadi	Gunung Sari Estate	-		South Kalimantan	Certified		
		Bebunga Mill -	Certified					
	PT Langgeng	Bebunga Estate	-		Kotabaru	Certified	10.14	
4	Muaramakmur	Sungai Cengal Estate	-		District – South Kalimantan	Certified	16-Mar-12	
		Bakau Estate	-			Certified		
		Sukamandang Mill	-		Seruyan and	Certified		
		Sukamandang Estate	-		East	Certified	1	
5	PT Kridatama Lancar	Sapiri Estate	-		Kotawaringin District –	Certified	5-Jul-11	
	Lancai	Barasdanum Estate	-		Central	Certified	1	
		Kuala Kuayan Estate	-		Kalimantan	Certified	7	
		Ladang Panjang Mill	-			Certified	9-Jul-12	Only Division 3 is certified
6	PT Bahari Gembira Ria	Ladang Panjang Estate	-		Muaro Jambi District - Jambi	Certified	9-Jul-12	(1,202 Ha). Total Areas of Divison 1 and 2 (1,796.19 ha) HGU still in process.
	PT Tunggal	Manggala Mill	-		D	Certified		
7	Mitra	Manggala 1 Estate	-		Rokan Hilir District – Riau	Certified	25-Nov-10	
	Plantations	Manggala 2 Estate	-			Certified		

		Manggala 3 Estate	-]	Certified]	
		Pondok Labu Mill	-			Certified		
	PT Paripurna	Pondok Labu Estate	-		Kotabaru	Certified		
8	Swakarsa	Binturung Estate	-		District – South	Certified	16-Mar-12	
		Rampa Estate	-		Kalimantan	Certified		
		Sesulung Estate	-			Certified		
		Gunung Aru Mill	-			Certified		
		Gunung Aru Estate	-			Certified		
9	PT Bersama Sejahtera Sakti	Gunung Kemasan Estate	-		Kotabaru District – South Kalimantan	Certified	5-Jul-11	
	Cojumora Carti	Laut Timur Estate	-			Certified		
		Pantai Timur Estate	-			Certified		
		Rantau Panjang Mill	-			Certified		
		Rantau Panjang Estate	-		Musi Banyuasin District – South Sumatera	Certified	16-Mar-12	
		Bumi Ayu Estate	-			Certified		
10	PT Guthrie	Karang Ringin Estate	-			Certified		
	ecconina	Napal Estate	-			Certified		
		Mangun Jaya Estate	-			Certified		890.98 ha – Still under land Legalization process.
		Sungai Jernih Estate	2023			Non- Certified		Sg. Jernih Estate and KKPA Was separated in 2022.
		Rantau Mill	-			Certified		
		Rantau Estate	-		Kotabaru District – South Kalimantan	Certified	30-Dec-11	
11	PT Laguna Mandiri	Matalok Estate	-			Certified		
		Betung Mill	-			Certified		
		Betung Estate	-			Certified	1-Apr-14	

		Sekayu Estate	-			Certified		
		<u> </u>			·	_		
		Sekunyir Mill	-		Seruyan and	Certified		
	PT Indotruba	Sekunyir	-		West Kotawaringin	Certified		
12	Tengah	Seruyan Estate	-		District – Central Kalimantan	Certified	23-Nov-10	
		Selabak Mill	-			Certified		Mill was closed down and all
		Selabak Estate	-		Kotabaru District – South Kalimantan	Certified		the supply bases was
		Randi Estate	-			Certified		transferred to Rantau Mill - PT Laguna Mandiri. The
13	PT Swadaya	Sangkoh Estate	-			Certified	16-Mar-12	Selabak Est, Randi Est,
15	Andika	Lanting Estate				Certified	10-iviai-12	Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification.
		Sungai Pinang Mill	-		Musi Rawas District – South Sumatera	Certified		
14	PT Bina Sains Cemerlang	Sungai Pinang Estate	2023			Non- Certified	11-Sep-12	Land legalisation process for 308.35 ha is still in process.
	Cemenang	Bukit Pinang Estate	2023			Non- Certified		300.00 Ha is suil ill process.
	1	T	T	T	1	T	T	1
		Pemantang Mill	-		Seruyan and	Certified	-	
	PT Teguh	Pemantang Estate	-		East Kotawaringin	Certified		
15	Sempurna	Kawan Batu Estate	-		District –	Certified	5-Jul-11	
		Hatan Tiring Estate	-		Central Kalimantan	Certified	4	
		Batang Garing Estate	-		Kalimanian	Certified		
		Teluk Bakau Mill	-		4	Certified	4	
		Teluk Bakau Estate	-		Indra Giri Hilir District – Riau	Certified	11-Oct-11	
16	PT Bhumireksa	Nusa Lestari Estate	-			Certified	1	
	Nusa Sejati	Nusa Perkasa Estate	-			Certified	4	
		Mandah Mill	-		-	Certified	1-Apr-14	
		Mandah Estate	-			Certified	1 / pi-14	

		Rotan Semelur Estate	-			Certified		
		Teluk Siak Mill	-			Certified		
	PT Aneka	Teluk Siak Estate	-		Pekanbaru,	Certified		
17	Intipersada	Pinang Sebatang Estate	-		Siak District –	Certified	11-Oct-11	
		Aneka Persada Estate	-		Riau	Certified		
	DT T	Ungkaya Mill	-		Morowali	Certified		
18	PT Tamaco Graha Krida	Ungkaya Estate	-		District – Sulawesi Tengah	Certified	10-Jul-12	
		Bukit Ajong Mill	-			Certified	18-Oct-10	
		West Estate	-		Sanggau	Certified		
19	PT SIME Indo	East Estate	-		District –West	Certified		
	Agro	East* Estate /Sei Mawang Estate	2023		Kalimantan	Non- Certified		Land legalisation process for East Est for 5,815.64 ha is still in process.
	T	- -			τ	1		
	PT Padang Palma Permai	Blang Simpo Mill	-		Aceh Tamiang and East Aceh District – Nanggroe	Certified		
	/	Tamiang (PT PPP) Estate	-			Certified	3-May-13	
20	PT Perkasa Subur Sakti/	Batang Ara (PT PSK) Estate	-			Certified		Land legalisation process for
	PT Perkebunan	Blang Simpo-01 Estate	-		Aceh	Certified		KKPA PT PPP – Land Permit is still in process.
	Industri & Niaga Sri Kuala	Blang Simpo-02 Estate	-		Darussalam	Certified		
		Lembiru Mill	-			Certified		PT Sandika Natapalma and PT
		Lembiru Estate	-			Certified	3-Jul-14	Budidaya Agro Lestari estates are supplying to one mill i.e.
0.1	PT Sandika	Awatan Estate	-		Ketapang	Certified	3-Jul-14	Lembiru Mill (PT SNP).
21	Natapalma	Karya Palma Estate	2023		District – West Kalimantan	Non- Certified		Pending confirmation from BPN on HGU Document.
00	PT Budidaya	Pelanjau (PT BAL) Estate	-		Ketapang	Certified	3-Jul-19	HGU obtained as per May
22	Agro Lestari	Beturus (PT BAL) Estate	2023		District – West	Non-		2018. However never been

					Kalimantan	Certified		released by BPN.
		MAS Mill	NA	NA	Sanggau District – West	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
		MAS 1 Estate	NA	NA		NA		
	PT Mitral	MAS 2 Estate	NA	NA		NA		
23	Austral	MAS 4 Estate	NA	NA		NA		
	Sejahtera	Plasma MAS Estate	NA	NA	Kalimantan	NA		confirmation of disposal of PT MAS and reported to Brusa Malaysia accordingly.

3) 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	
		Tetere Oil Mill					
		Tetere Estate		Guadalcanal Province, Solomon Islands	Certified		
	Cuadalaanal	Ngalimbiu Estate				18-Mar-11	
1	Guadalcanal Plains Palm Oil	Mbalisuna Estate	NA				
'	Limited (GPPOL)	Smallholders – West Zone (83)	INA		Certified	10-Wai-11	
	, ,	Smallholders – Central Zone (53)					
		Smallholders – MBA East Zone (59)					
		Smallholders – MBE East Zone (37)					
		Hagita Oil Mill					
		Giligili Estate		Milne Bay	Certified	15-Feb-13	
2	Milne Bay Estates	Hagita Estate	NA	Province,			
	(MBE)	Waigani Estate		Papua New Guinea			
		Sagarai Estate		Guillea			

	1		1	T	1	
		Padipadi Estate				
		Mariawatte Estate				
		Smallholders - East Gurney Estate (259)				
		Smallholders - West Gurney Estate (231)				
		Smallholders - East Sagarai Estate (156)				
		Smallholders - West Sagarai Estate (212)				
		Poliamba Oil Mill				
		Kara Estate				
		Nalik Estate				
		West Coast Estate		New Ireland		
3	3 Poliamba (POL)	Noatsi Estate		Province, Papua New	Certified	19-Mar-12
		Madak Estate		Guinea		
		Smallholders -North Division (615)				
		Smallholders- South Division (866)				
		Smallholders -West Division (309)				
		Gusap Mill				
		Gusap East (Gusap) Estate				
		Gusap West (Paddox) Estate				
	Ramu Agricultrual	Surinam Estate		Morobe		
4		Dumpu Estate	NA	Province,	Certified	5-Aug-10
		Ngaru Estate		Papua New Guinea		5
		J Estate (Jephcott) Estate		Guillea		
		Smallholders - Madang VOPs (71)				
		Smallholders - Morobe VOPs (253)				
	1		1	1	1	

No	Management Unit (SOU Name)	Supply Base	Time Bound Plan	Location	Status	Certified Date
		Sangara Oil Mill				
		Mamba Oil Mill				
		Embi Estate				
		Ambogo Estate				
		Sangara Estate				
	11: 1 0:15	Sumbiripa Estate		Oro Bay Province, Papua New	Certified	
5	Higaturu Oil Palm (HOP)	Mamba Estate	NA			1-Feb-13
	(1101)	Sambogo Estate		Guinea		
		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)				
		Mosa Oil Mill				
		Kumbango Oil Mill				
		Kapiura Mill				
		Numundo Mill				
		Waraston Mill		Kimbe, West		
6	West New Britain (WNB)	Bebere Estate	NA	New Britain, Papua New	Certified	10-Sep-08
	(VVIND)	Kumbango Estate		Guinea		·
		Togulo Estate		J. G. G. H. G.		
		Dami Estate				
		Waisisi Estate				
		Kautu Estate				

No	Management Unit (SOU Name)	Supply Base	Time Bound Plan	Location	Status	Certified Date
		Karausu 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	Erap Mill	Sep-20		Certified	Certified on 27 March 2020.
	Farming	Munum Estate	Sep-20	Markham	Certified	There is total area for NPP: 710.30 ha which is
7	Company Limited (MFCL)/Markham	Maralumi Estate	Sep-20	Farms	Certified	currently excluded from the certification scope until the NPP is approved.
	Agro Pte. Ltd.	Erap Estate	Sep-20		Certified	

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
	Sime Darby	Grand Cape Mount Mill					As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its
	Plantation	Bomi Estate	Not Applicable	Grand Cape Mount County	Not yet Certified	NA	disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI).
1	(Liberia)	Lofa Estate					http://www.simedarbyplantation.com/media/pressreleases/sime-
	Grand Cape Mount	Matambo Estate	 Property disposed 				darby-plantation-completesdivestment-of-its-liberia-operations
	iviourit	Grand Cape Mount Estate	-				