



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

File Ref. : ES10171015

RSPO PUBLIC SUMMARY REPORT

CLIENT : SIME DARBY PLANTATION BERHAD – SOU DERAWAN

PARENT COMPANY : SIME DARBY PLANTATION BERHAD

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

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

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

MAP : See Attachment 1

AUDIT DATE : 26/09/2022 – 1/10/2022

DURATION : 20 auditor days

TYPE OF AUDIT : ☒ Annual Surveillance Audit 1– 2022 ☐ Recertification Audit

STANDARD : MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

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

VALIDITY OF RSPO CERTIFICATE : 30/12/2021 – 29/12/2026

The following attachments form part of this report:

Non-conformity Report(s) ☐

List of additional site(s) ☐

Report by Audit Team Leader

Name : Selvasingam T Kandiah

Signature :

Date : 27/12/2022

Acknowledgement by Client's Representative

Name : Amirul Akmal Daud

Signature :

Date : 3/1/2023

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SUMMARY OF AUDITS

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

Annual Surveillance Audit 1				
On-site audit date	:	26/09/2022 – 1/10/2022	No. of auditor days	: 20
Audit team	:	Selvasingam T Kandiah (LA), Mohd Zulfakar Kamaruzaman, Dzulfikar Azmi, Mohd Ab Raouf Asis		
No. of major NCR	:	1	Indicator: 7.8.2	Closing date : 20/12/2022
No. of minor NCR	:	1	Indicator : 3.3.2	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers
		√		√
		Contract workers	NGOs	Govt. agency
		√		
		Indigenous people	Contractor	Others (Please specify)
		NA	√	
Supply base sampled	:	All: Derawan, Sahua, Takau & Damai Estates		
Changes since the last audit	:	Changed planted Ha on Damai Estate from 1899.05 Ha to 1965.78 Ha. That is an increase of 66.73 Ha due to GPS survey in May 2022.		
Justification of audit planning	:	<p>The total allocation of auditor days for Derawan CU were: 20 auditor days</p> <p>Mill = 4 days (3 day for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems).</p> <p>There was four (4) estates audited namely Derawan, Sahua, Takau and Damai Estates. Four (4) man-day each was allocated for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.</p>		
Report approved by	:	Kamini Sooriamoorthy	Approval date : 27/12/2022	

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SUMMARY OF INFORMATION

TABLE 1

	STAGE 2/ RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Dec 2021 – Nov 2022	Oct 2022 – Sept 2023			
Certified FFB Processed (MT)	140,196.69	113,502.09			
Production of Certified CPO (MT)	35,049.17	24,273.54			
Production of Certified PK (MT)	7,104.03	5,594.82			
Certified Areas (Ha)	9,528.83	9,528.83			
Planted Areas (Ha)	*8,295.59	**8,362.32			
Production Areas (Ha)	6,972.59	6,512.89			
HCV Areas / Conservation Areas (Ha)	333.70	333.70			
REMARKS	<p>RA-2021 *Derawan CU has confirmed that these certified areas figures were provided by the SDP Land Management Department. It has been noted that these figures included the portion shared between Derawan CU and estates under Rajawali CU. For information there were 5 titles across Damai, Saha and Derawan Estates that has shared portion with estates under Rajawali CU. As for RSPO reporting, the total certified area shall follow the total title declared by the Land Management Department's figure and titles recorded at their end as the final figures. The email between the CU and the SDP Land Management was sighted.</p> <p>ASA1-2022 **Changed planted Ha on Damai Estate as there is an increase to the total hectareage based on GPS survey in May 2022.</p>				

TABLE 2

	PO	PK
**Last years certified volume (MT)	35,049.17	7,104.03
Last years actual certified sold (MT)	13,540.63	2,547.43
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	2,073.62	891.45
Last year actual sold CSPO credits (where applicable)	0.00	0.00
New year certified volume (MT)	24,273.54	5,594.82

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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
Selvasingam T Kandiah	Lead Auditor GAP/ Safety/Metrics	Holds a B. Sc. (Hons) in Agriculture. He had worked as a planter with Kumpulan Guthrie Berhad before retiring including in Liberia. He has more than 29 years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C & MSPO.
Mohd Zulfakar bin Kamaruzaman	Auditor Supply Chain, Social, HCV,	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C and RSPO Supply Chain.
Dzulfiqar Azmi	Auditor / Safety & Environment,	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He has experience in auditing since 2018. He is trained as an RSPO Lead Auditor.
Mohd Ab Raouf Asis	Auditor / Social, TBP	Obtained qualification in B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM in 2007. He has been in the plantation industry for 7 years assisting Estate Manager managing palm oil estates. He has been trained as RSPO as well as MSPO auditor.

1.3 Audit methodology

The audit covered the Derawan Palm Oil Mill and 4 of its supply base. The sampling methodology applies for supply base with higher than four estates. The sampling shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The 4 supply base are Derawan Estate, Damai Estate, Sahua Estate and Takau Estate. The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

Stakeholder consultation process is carried out during initial compliance and recertification audit only.

During this audit Stakeholders were interviewed during the audit as tabulated below:

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (local / foreign / Orang Asli workers / male & female)	<p>Workers:</p> <p>The following were confirmed during the conduct of audit as there was no evidence to prove otherwise:</p> <ol style="list-style-type: none"> All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in English/Bahasa as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer. They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. They have been getting salaries above or at least RM1,200 since Jan 2020. It was depend on the productivity and out turn, however the employees understood on the system. Salaries were paid before the 7th of every month via bank transactions and cash. The company is in progress to fully implemented salary to bank in into each respective employees. No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment. No discrimination between migrant workers and local workers, between male and female workers. Comfortable housing with water and electricity provided. Local workers choose to stay in their houses in the nearby villages. Have access to affordable food from the canteen/sundry shops within the estate/mill premises. Entitled to free medical facilities at the estate clinic. Have representatives who attend regular meetings with the management where they can put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects. They knew the types of work offered at mill & estate when they were in their own countries. All migrant workers keep their own passports. NCR has been issued in indicator 1.1.2 on the monitoring of pregnancy of female employees.
2) Settlers	Not applicable.
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> Confirmed there is no land dispute between Derawan CU and neighbouring estates. No social issues arising from estate workers.

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	<ul style="list-style-type: none"> ▪ Occassionally are called to attend meetings by Deerawan mill and estates. The last one was held few months ago. ▪ All stakeholders were Invited to attend RSPO/MSPO briefings and stakeholder meetings. ▪ Derawan CU is operating harmoniously with surrounding oil palm smallholdings (Palmhead Sdn. Bhd. and Sarawak Pulp Industries) ▪ No issue about pollution. <p>Some workers who work at Derawan CU come from neighbouring places around the mill/estates.</p>	
4) Suppliers	<ul style="list-style-type: none"> ▪ Suppliers of hardware and FFB transporters since 1997. ▪ Derawan CU and supplier contract were signed by both parties. Suppliers would be contacted to supply hardware items as and when the need arises. FFB transporter's service was needed when required. This happens approximately once in two months for suppliers but daily for transporters. ▪ Fair dealings with the units in Derawan CU. ▪ Payments are made within 1 months of invoice. 	
5) Contract workers (local / foreign / Orang Asli workers / male & female)	At time of visit there were no contract workers.	
6) Local & national NGOs	Not available for this audit.	
7) Government agencies / Statutory bodies	<ul style="list-style-type: none"> ▪ No indigenous peoples living near the Derawan CU. ▪ No land claims/disputes and no social issues. ▪ Harmonious co-existence with relevant stakeholders. ▪ Document review showed officers of the relevant Government agencies especially the Jabatan Tenaga Kerja Bintulu had good working relationship with Derawan CU. ▪ Government agencies also confirmed no offenses incurred by Derawan CU. 	
8) Independent growers / Smallholders	NA	
9) Indigenous people	NA	
10) Contractor	<ul style="list-style-type: none"> • All Contractors had provided services to Derawan mill/estates for the past 4-5 years. Each signed a contract and understands contractual obligations and the need to comply with legal requirements. ▪ Fair dealings with the units in Derawan CU. ▪ Payments are made within 1 months of invoice. ▪ For transporter contractor, the estate mandore and staff will verify the work the contractor has done before his invoice can be approved for payment. ▪ All contractors' workers had attended MSPO training, signed COBC commitment statement and safety briefing. The Company provides PPE (vest, goggles, straw hat) ▪ Suppliers of hardware and spare parts invoices were based on agreed quoted prices. ▪ Payment to contractors were made usually within 45 days of invoice. Renewal of contract is via tender system. ▪ Contractor and his workers knew about the minimum wages order requirement the workers make statutory contributions such as EPF and SOSCO. Workers details including names, pay slips, were presented for verification. 	

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	<ul style="list-style-type: none">▪ Contractor removes domestic waste from workers' quarters, provide recycling services. Signs annual contract. Terms and conditions are clear and fair. Payments are received within one month.▪ All contractors also attended stakeholder meetings. Contractors must provide to the estate's copies of their worker details and payslips.
11) Previous land owner (if any)	No issues
12) Others (please specify)	No issues

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1.5 Audit plan : Refer to Attachment 2

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

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Derawan Certification Unit (CU) is one of the Strategic Operating Unit (SOU) of Sime Darby Plantation Sdn Bhd (SDPSB). The CU is in Bintulu, Sarawak, East Malaysia and known as SOU 33. The CU consisted of one palm oil mill, the Derawan Palm Oil Mill (DPOM) and four supply bases, namely, Derawan Estate, Damai Estate, Sahu Estate and Takau Estate. All Estates belong to SDPB. DPOM commenced operations in 1994 with a processing capacity of 40 metric tonnes of FFB per hour. The total combined land area of the four estates is 9,528.83 hectares (Ha) of which 8,362.32Ha planted with oil palm. All the estates have been fully developed before 2005, hence Principle 7 of the RSPO P&C is therefore not applicable.

The CU does not have other management system certification other than MSPO Certification.

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

The FFB sourced from company own estates that are certified and third parties which are not certified.

Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

Table 1: Actual FFB production by the supply base for the last reporting period (Dec 2021 to Sept 2022)

Estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Derawan Estate	16,243.95	22.04	SIRIM
Takau Estate	23,199.14	31.48	SIRIM
Damai Estate	17,973.90	24.39	SIRIM
Sahu Estate	15,830.65	21.61	SIRIM
Subtotal	73,247.64	99.39	
Third parties	448.63	0.61	
Total	73,696.27	100	

Table 2: Projected FFB production by supply base for the next reporting period (Oct 2022 to Sept 2023)

CU own estates	FFB Contribution		Certifying CB
	Tonnes	Percentage (%)	
Derawan Estate	30,146.18	26.56	SIRIM
Takau Estate	34,197.12	30.13	SIRIM
Damai Estate	24,669.49	21.73	SIRIM
Sahu Estate	23,013.30	20.28	SIRIM
Total	112,026.09	98.70	
Third parties	1,476.00	1.30	
Grand Total	113,502.09	100.00	

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**Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period
(Dec 2021 to Sept 2022)**

RSPO Supply Chain Model: Mass Balance		Dec 2021 – Sept 2022
FFB Received		73,696.27
FFB Processed		73,696.27
Certified FFB Processed		73,247.64
Non-certified FFB Processed		448.63
Overall CPO Production		15,708.72
Certified CPO Production		15,614.25
Non - Certified CPO Production		94.47
Certified CPO delivered as RSPO		13,540.63
Certified CPO delivered as non-RSPO		2,073.62
Certified CPO delivered under other sustainable schemes		0
Overall PK Production		3,459.75
Certified PK Production		3,438.88
Non - Certified PK Production		20.87
Certified PK delivered as RSPO		2,547.43
Certified PK delivered as non-RSPO		891.45
Certified CPO delivered under other sustainable schemes		0
Credits traded through Books and Claim		0

**Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period
(Oct 2022 to Sept 2023)**

RSPO Supply Chain Model: Mass Balance		Total (MT)
FFB Received		113,502.09
FFB Processed		113,502.09
Certified FFB Processed		113,502.09
Non-certified FFB Processed		0
Certified CPO Production		24,273.54
Certified PK Production		5,594.82

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Derawan Estate	2244.77	2490.79
Takau Estate	2078.48	2107.00
Damai Estate	1965.78	2287.04
Sahua Estate	2073.29	2644.00
Total	8362.32	9528.83

Table 6 Planting profile for *SOU Derawan*

<u>Estate</u>	<u>Year of planting</u>	<u>Planting Cycle</u>	<u>Mature (Ha)</u>	<u>Immature (Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Derawan Estate	1994	1 st	166.27		166.27	100	
	1995	1 st	116.49		116.49	100	
	1996	1 st	68.23		68.23	100	
	2012	2 nd	179.58		179.58	100	
	2013	2 nd	123.75		123.75	100	
	2014	2 nd	239.08		239.08	100	
	2015	2 nd	288.67		288.67	100	
	2017	2 nd	172.49		172.49	100	
	2018	2 nd	178.93		178.93	100	

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	2019	2 nd	196.50		196.50	100	
	2020	2 nd		319.35	319.35		100
	2022	2 nd		195.43	195.43		100
Sub Total			1729.99	514.78	2244.77		
Damai Estate	1997	1 st	105.14		105.14	100%	
	1998	1 st	283.47		283.47	100%	
	2014	2 nd	97.23		97.23	100%	
	2015	2 nd	333.19		333.19	100%	
	2016	2 nd	295.56		295.56	100%	
	2017	2 nd	240.00		240.00	100%	
	2018	2 nd	58.87		58.87	100%	
	2020	2 nd		237.95	237.95		100%
	2021	2 nd		117.44	117.44		100%
Sub Total			1413.45	552.33	1965.78		
Takau Estate	1995	1	648.67		648.67	34.01	
	2013	2	185.23		185.23	10.74	
	2014	2	181.52		181.52	10.53	
	2016	2	172.16		172.16	9.98	
	2017	2	201.46		201.46	11.68	
	2018	2	236.11		236.11	13.69	
	2019	2	161.44		161.44	9.36	
	2020	2		162.73	162.73		55.75
	2022	2		129.16	129.16		44.25
Sub Total			1786.59	291.89	2078.48	100	100
Sahua Estate	1994	1 st	166.42	0	166.42	100%	
	1995	1 st	58.48	0	58.48	100%	
	1998	1 st	710.39	0	710.39	100%	
	2000	1 st	32.10	0	32.10	100%	
	2016	2 nd	153.57	0	153.57	100%	
	2017	2 nd	237.16	0	237.16	100%	
	2018	2 nd	224.74	0	224.74	100%	
	2020	2 nd	0	181.59	181.59		100%
Sub Total			1582.86	490.43	2073.29		
Grand Total			6512.89	1849.43	8362.32		

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Amirul Akmal Daud
Position	:	Manager
Address	:	Sime Darby Regional Office, Rajawali Complex, P.O.Box 673, KM52, Bintulu-Miri Road, 97008, Bintulu Sarawak
Phone no.	:	019-662 2831
Fax no.	:	-
Email	:	amirul.akmal.daud@simedarbyplantation.com

3.0 AUDIT FINDINGS

3.1 Changes to certified products in accordance to the production of the previous year
None

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

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

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

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

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

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

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

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

If no, please state reasons NA

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

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

No changes

3.4 Status of previous non-conformities * ☒ Closed ☐ Not closed*

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

3.5. Complaint received from stakeholder (if any)

No significant complaints from stakeholders were observed

4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s)
(details refer to Attachment 4) 1 List : DA 01 2022 (3.3.3)

Total no. of major NCR(s)
(details refer to Attachment 4) 1 List : DA 02 2022 (7.8.2)

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

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

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

5.0 AUDIT CONCLUSION

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

6.0 RECOMMENDATION

☐ No NCR recorded. Recommended to continue certification.

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

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

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

☒ Recommended to continue certification.

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

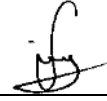
Note: Major NCRs which are not addressed within a further 60 days shall result in the certificate being withdrawn.

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

Audit Team Leader : Selvasingam T Kandiah

(Name)



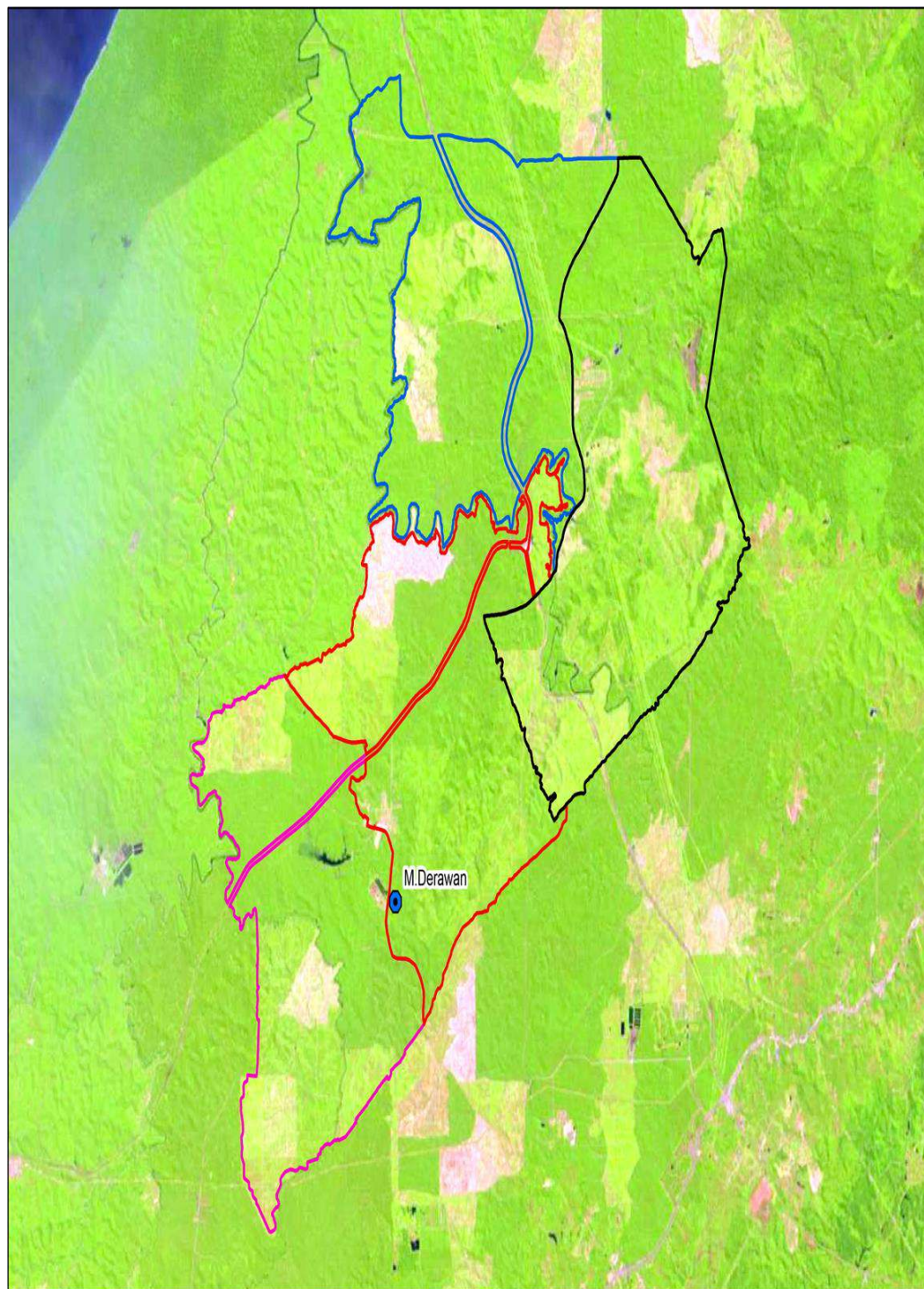
(Signature)

20/12/2022

(Date)

Attachment 1 - Map

Map of SOU Derawan



SOU Boundary Map



1:72,654



0 700 1,400 2,800 Meters

Legend

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

Datum/Spheroid: WGS 1984/WGS 1984
 Projected Coordinate System: UTM Zone 47N
 Spatial Resolution: 30m GSD
 Image Reference/Cloud Cover: LC8126572014RSLDND01 20%
 WGS Point / File: 129 / 057 (Derawangi)
 Date Acquired: 2014-07-02
 Software: ArcGIS 10.4.1
 Paper Size: A3 (11.69" x 16.54")
 Prepared by: Sustainability Unit (SUU)
 Date Prepared: 2017-11-28

Attachment 2 – Audit Plan

RSPO Surveillance Audit Plan ASA1

1. Objectives

The objectives of the audit are as follows:

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

2. Date of assessment : ~~26th to 30th September 2022~~
Revised to 26th to 30th September and 1st October 2022

3. Site of assessment : SOU 33 Derawan Certification Unit

- Derawan Palm Oil Mill
- Derawan Estate
- Sahu Estate
- Takau Estate
- Damai Estate

4. Reference Standard:

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

5. Assessment Team

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

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

6. Audit Method

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

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

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

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

- a) Reporting time frames for economic data are:
 - i. Calendar year (January to December): January 2021 to December 2021, and
 - ii. 12 months period counting up to two months before audit month: May 2021 to June 2022
- b) Reporting time frames for demographic data:

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- i. For mill and estate workers: as of 31 December 2021
- ii. For smallholders and outgrowers: January 2021 to December 2021
- c) Reporting time frame for all other social and environmental data:
 - i. January 2021 to December 2021

The updated Metrics Template (as attached, the version 2.0) was enforced from 1 August 2021. We also need the master list of all workers showing name, gender, date of birth, date joined, NRIC, Passport & Work permits numbers, etc. Please submit at the soonest.

8. Audit Findings

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

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

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

For both Major and Minor non conformities the root cause and corrective action plan should be submitted with 30days.

9. Confidentiality Requirements

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

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

10. Working Language: English and Bahasa Malaysia

11. Reporting

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

12. Facilities Required

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

13. Assessment Programme Details : As below

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Revised Audit Plan Derawan CU

Date / Time	Coverage of assessment / Activity / Site	STK	MZK	DA	
Day 1-26/09/2022 8.30am – 9.00am	Opening Meeting – Venue: Derawan POM <ul style="list-style-type: none"> Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases , Time bound plan, actions taken to address previous audit findings. 	/	/	/	
9.00am – 12.30pm	Site observation to Derawan POM P1, P2, P3,P4,P5, P6, P7 & MSPO SC <ul style="list-style-type: none"> Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the POM Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Occupational safety & health aspects, chemical management Good Milling Practice Legal & Other requirement RSPO Supply chain standard implementation including model requirements Environmental management, waste & chemical management • GHG Calculation 	/	/	/	
12.30pm – 1.30pm	Lunch Break				
1.30pm – 5.00pm	Continue assessment at respective sites	/	/	/	
Date / Time	Coverage of assessment / Activity / Site	STK	MZK	DA	MAR

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Day 2-27/09/2022 9.00am – 12.30pm	Site observation to Derawan Estate P1, P2, P3,P4,P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. • GHG Calculation • New planting 	/	/	/	/
12.30pm – 1.30pm	Lunch Break	/	/	/	/
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/

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Date / Time	Coverage of assessment / Activity / Site	STK	MZK	DA	MAR
Day 3- 28/09/2022 8.30am – 12.30pm	Site observation to Sahau Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. 	/	/	/	/
	<ul style="list-style-type: none"> • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. • GHG Calculation • New planting 				
12.30pm – 1.30 pm	Lunch Break	/	/	/	/
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/

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Date / Time	Coverage of assessment / Activity / Site	STK	MZK	DA	MAR
Day 4- 29/09/2022 8.30am – 12.30pm	Site observation to Takau Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. 	/	/	/	/
	<ul style="list-style-type: none"> • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. • GHG Calculation • New planting 				
12.30pm – 1.30pm	Lunch Break	/	/	/	/
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	STK	MZK	DA	MAR
Day 5- 30/09/2022 8.30am – 12.30pm	Site observation to Damai Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management Interview with workers, contractors etc.	/	/	/	/
12.30pm – 1.30pm	Lunch Break	/	/	/	/
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/

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Date / Time	Coverage of assessment / Activity / Site	STK	MZK	DA	MAR
Day 6-01/10/2022 8.30am – 12.30pm	Auditor continue unfinished assessment at All Estate (will inform at the morning which estate) P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. • GHG Calculation • New planting 	/	/	/	/
12.30pm – 1.30 pm	Lunch Break (Friday Prayer)	/	/	/	/
2.30pm –3.00pm	Continue assessment at respective site	/	/	/	/
2.30pm –4.00pm	Audit Team Discussion	/	/	/	/
4.00pm – 5.00pm	Closing meeting at Lawang Complex (please arrange transport Auditor to Bintulu Airport for Flight)	/	/	/	/

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

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Attachment 3

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

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	Documented communication procedure at Derawan CU continued to be implemented. At the time of the audit all requests for information from the stakeholders had being recorded. All the estates and mill audited provide availability of management documents i.e. related to environment, and social and legal issues to the public except for those prevented by commercial confidentiality or where disclosure of information that would potentially result in negative environmental or social outcomes. SDPB continued to use website for disseminating public information which are available in the company's website http://plantation.simedarby.com . Information among others in relation to the following; land titles, safety and health plans, pollution prevention plans and procedure for complaints and grievances.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	The CU continued to maintain stakeholders for contractors, vendors/suppliers, government agencies, schools, local communities, etc. It was noted that Sime Darby Plantations has revised their website, www.simedarbyplantation.com to include all management documents relating to the unit's environmental, social and legal issues demonstrating commitment towards compliance to RSPO criteria via Sime Darby Plantation Sustainability Report.
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	SOU Derawan had identified personnel responsible for handling of complaints. Records of communication were maintained. Communication with the authority such as DOSH, DOE and Labour Department were maintained in the google drive. At the point of this assessment, there has been no request for such information by the public.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	The consultation and communication procedures were documented. External and internal communication procedures developed by Sime Darby Plantation for the estates and mill maintained to be followed and available at the audited sites. In the case of internal communications, records of meetings, briefings and memos were sighted. Notices and posters / pamphlets observed displayed on notice boards at the office and the muster ground were also used as a means of internal communication. Regular morning briefings were used by the management to communicate policies, procedures, rules and regulations and other information to its employees. In the case of external communications, they were mainly in the form of correspondence, which were kept in the External Communication File.

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Clause	Indicators	Comply Yes/No	Findings
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	The list of stakeholders for the Mill and Estates in SOU 33 Derawan was maintained by the respective sites. The stakeholders comprise of contractors, vendors/suppliers, neighbouring estates/smallholders, government agencies, clinics, hospitals, including internal stakeholders.
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	Units within the SOU 33 Derawan subscribes to the Sime Darby Plantations Group's Code of Business Conduct (COBC). This Code applies to all its employees, counterparts, business partners, affiliates and associates. Among the contents of the COBC include avoiding conflict of interest, guarding against bribery and corruption, ethics on gifts and corporate hospitality, donations and sponsorships, dealing with counterparts and business partners, government agencies and public officials.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	Sime Darby Plantations also has an Online Vendor Registration (OVR) and the Vendor Code of Business Conduct (VCOBC) which has been developed to outline the standards of behaviour required by Sime Darby Plantations vendors which includes expectation to uphold human rights. The Online Vendor Registration (OVR) and the Vendor Code of Business Conduct (VCOBC) applies to all its suppliers, consultants, agents, contractor's/service providers who have direct dealings with the Sime Darby. SDPB also has implemented Whistle Blowing Policy to help all stakeholders raise concern, without fear of retaliation on any wrongdoing that they may observe in SDPB Group. The channel of whistleblowing is such as E-form that could be downloaded http://www.simedarbyplantation.com/corporate/whistleblowing or through email, call or write letter to the whistleblowing unit in Head Office. Besides that, the company established Internal Audit to monitor the compliance and implementation of the policy throughout the plantations.

Principle 2: Operate legally and respect rights

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

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	YES	It was evident that Derawan CU continue to comply with most of the applicable laws and regulations.
	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.

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Clause	Indicators	Comply Yes/No	Findings
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	YES	The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 4 estates, during the field inspection confirmed that they were clearly marked and maintained.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	YES	List of contractor parties were maintained at Estates and Mill at the SOU Derawan. These were all maintained and updated accordingly on 2/1/2022. The list contain details of the stakeholders, addresses and contact details.
	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	All contracts contain specific clauses on meeting applicable legal requirements as verified through Online Vendor Registration (OVR) and the Vendor Code of Business Conduct (VCOBC) which apply to all contractors for due diligence and meeting legal requirements.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	YES	All 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.
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> Information on geo-location of FFB origins. Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license 	YES	Derawan POM has documented the following for the directly source of FFB: <ul style="list-style-type: none"> a) Information on geo-location of FFB origins. b) Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder The evidence of currently document is available in the 'Smallholder Mapping', Desktop Review Assessment for new OCP Suppliers, sighted the Land Title, MPOB License, during the conduct of audit.
	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	YES	Currently in Derawan POM there is no practice of indirectly source of FFB. All FFB are received direct from the suppliers.

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Clause	Indicators	Comply Yes/No	Findings
	Indicator 2.3.1.		

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	YES	The CU continued to have documented management projection plans up to 2027. Some of the parameters covered were: <ul style="list-style-type: none"> • Management Cost • Mill Operation Cost like Reception, Fruit handling, Sterilization, Power Generation and Etc. • Power Generation • Water Treatment • Administration • Capex
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	Derawan CU had established and documented a management plan (budget) inclusive of a long-range replanting (LORR) program from 2020 to 2030. This management plan inclusive of the replanting program was reviewed annually. The decision for replanting was based on factors like FFB crop availability for the mill, Yield, Height & Age of palms, market price of CPO, etc.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	Derawan CU continued to conduct Management reviews after their Annual RSPO/MSPO Internal audits. The Internal Audits were conducted by Sustainability Compliance Unit, Group Sustainability Department. The audit reports are made available to the management for their review. Management Review meetings were conducted by the respective Managers.
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	Continuous Improvement Plan has been implemented. The improvement plan outlined issues highlighted as per in the EAI as well as other reporting means i.e. internal audit as well as external audit. Example of the items outlined are as follows: <ol style="list-style-type: none"> a) Social Impact Assessment b) Management Plan on Social Impact Assessment c) Environmental Aspect Identification (EAI) and Environmental Impact Evaluation (EIE) registers. d) Pollution Prevention Plan e) Identification and Management of Wastewater f) Contingency plan during water shortage g) Action plan to reduce freshwater usage

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Clause	Indicators	Comply Yes/No	Findings
continuous improvement in key operations.			h) Water management plan
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	YES	Submitted to the RSPO metrics template to the audit team accordingly.
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	SOU Derawan continued to use and implement SOPs for each of the processes. Brief version of the SOPs was displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOPs.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	Both the estates and the mill had established mechanisms to ensure consistent implementation of procedures. Some of the mechanisms are internal audit, management review, regulatory visit, Agronomic advisory report, etc.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	NO	Records of monitoring and actions taken by the estates continued to be maintained. This is to ensure that the established procedures were consistently implemented. Records of monitoring and actions taken by all 3 estates were maintained and kept for a minimum of 12 months. However, records of monitoring and any actions taken for the following were not maintained and available: 1) DOE License 003014 for Derawan POM – Environmental Quality (Amendment) Act 2012 (Regulation 49A) 2) SOM – Environmental Aspect/Impacts Evaluation Procedure dated 25/05/2015 3) Audiometric Test Programme Report # GGOSH/PUA-KKSD/2021/01 dated 20/09/2021 As a result, Minor NCR DA 01 2022 was raised.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	YES	There are no new plantings or new operations within Derawan CU. A Social Impact Assessment (SIA) covering 5 operating units namely Derawan Palm Oil Mill, Derawan Estate, Sahua Estate, Takau Estate and Damai Estate was carried out from 5 th to 9 th September 2016 by the PSQM Unit of the Sime Darby Plantation. Records of meetings were documented and made available during the audit. Among the stakeholders who attended were workers, staff, workers' union, suppliers, contractors, community heads and teachers. Respective estate map, manpower statement as of 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

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Clause	Indicators	Comply Yes/No	Findings
monitoring plan is implemented and regularly updated in ongoing operations.			mapping, employment conditions, living conditions, health & safety in the workplace, public health & safety, respect for human rights, communication with management, and community relations. Based on demographic assessment, there are 0 nearest villagers.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	YES	For Derawan CU, the SIA and EAI reports separated. Environmental Aspect and Impact, Management Action Plans and Pollution Preventive Plan which covers from upstream activities such as FFB reception until downstream processes was sighted during assessment. Identification and evaluation of environmental aspect impact was done for all activities and processes related to the mill operation. The EAI was reviewed on 20/07/2022 regarding installation of ESP System. Among the most significant environmental receptors are the boiler stack emission which associated with air emission, palm oil mill effluent (POME) discharge to waterways. 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 had included stakeholders' consultation with regards to environmental aspects, impacts, and pollution control, and ERT, HCV and land usage issues. The reviews done had involved respective internal stakeholders such as workers representative, estate management and involvement with external stakeholders such as from Govt. agencies, neighboring estates, local villagers, suppliers and contractors. So far, no issues related to environmental has been highlighted during stakeholders meeting.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		Review of the SIA report and document review at Derawan POM showed that the assessment has been carried out with the participation of the affected parties. So far, no negative impact issues related to environmental have been highlighted during stakeholders meeting.
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. 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.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	Employment procedures available. Evidence of implementation is available from workers' files such as application form, interview, medical test and issuance of letter of offer. Based on interview with employees, there was no issues with the employment procedures as stated in their agreement as when they were entering the company.
3.6 An occupational health and safety	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and	YES	The hazard identification, risk assessment and risk control (HIRARC) procedure has been established. Derawan CU have conducted the risk assessment on all its operation as well as determining their control measures.

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Clause	Indicators	Comply Yes/No	Findings
(H&S) plan is documented, effectively communicated and implemented.	implemented.		
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	Health, Safety and Environment Policy for Sime Darby Plantation Berhad have been established for Upstream and Group dated 01/06/2020 and 05/05/2022. The policy had been communicated to all levels of the organization through morning briefings and also being displayed prominently in Bahasa Malaysia and English on notice boards at mill and estates office and Muster Ground. During interviews with the foreign/local workers and staff during the site visit estates field operation, mill operation, workshop, office compound, workshop, laboratory, engine room, boiler house revealed that the employees had been briefed and understood the policy. At Derawan CU on the OHS management plan has established for 2022 to addressed issues related to hazards and risks, legal register and its requirements for compliance, incident reporting, ERP, chemical safety management, risk management, noise management, contractor safety management, communication, inspection, awareness and competency training, DOSH visit and inspection/audit, etc. Generally, the OSH plans were acceptable.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	YES	The operating units visited has conducted training need analysis for all employee, management and contractors. The need analysis was conducted based on the job designation and training required by the job type. Trainings was identified for management, employee and contractors and programmed throughout FY 2021 and 2022. The training identified covers the safety and health, environmental and social aspect. The trainings were sighted to have included Gender Specific Training and involves staffs and workers.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	Records of training was maintained, where appropriate on an individual basis. Sighted the training record for 2021 and 2022 during the conduct of audit.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	YES	Appropriate training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been conducted on 18/8/22 attended by 27 person including PIC, Clerk, Assistant Engineer, Staff, Weighbridge Operator and Attendance list & photograph was seen.

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SUPPLY CHAIN REQUIREMENTS FOR MILLS

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

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	YES	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information was: Name: Derawan Oil Mill Country: Malaysia. Member Category: Oil Mil Core product: Palm Oil
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard. 	YES	<p>"Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia", approved on May 2022 and effective 1 Jun 2022.</p> <p>The procedure described the following:</p> <p>Clause 3.0 ~ Scope</p> <p>Clause 4.0 ~ The responsibility of for the implementation of RSPO SCC i.e. head of operating unit</p> <p>Clause 5.0 ~ Control of document & records such as weighbridge tickets, consignment note, training record & contracts. Record retention for 10 years. Define the critical control point (CCP): estate – weighbridge, mill – weighbridge, admin office, ramp, CPO despatch area, CPO storage tank. Kernel silos.</p> <p>Clause 6.0 ~ Delivery of FFB from the estate – relevant record involved, flowchart for crop diversion, list of mill and their supply chain model i.e. IP or MB</p> <p>Clause 7.0 ~ Receiving FFB at the mill – list of supply base, rules for determining diverted FFB destination, relevant record</p> <p>Clause 8.0 ~ ISCC Compliant waste / residues materials</p> <p>Clause 9.0 ~ Process monitoring – for IP model mill need to ensure no mixing of RSPO certified and non-certified and MB model</p> <p>Clause 10.0 ~ CPO and PK despatch – [Clause 9.1] all delivery of CPO and PK shall be in accordance with the contract allocated by Global Trading & Marketing (GTM) department</p> <p>Clause 11.0 ~ Non-conforming material / product – requirement to downgrade the RSPO Product</p> <p>Clause 12.0 ~ Product claim – shall follow RSPO rules on market communication & claim</p> <p>Clause 13.0 ~ Outsourced contractor - the mill has established list of outsourced contractor. Sighted list of transporter for CPO and PK.</p> <p>Clause 14.0 ~ Training – the mill shall provide training for relevant personnel carrying the task at tech critical control point (CCP).</p> <p>Clause 15.0 ~ Reclassification of mill's supply chain model - Reclassification of mill's supply chain model may be determined by GTM/ PSQM. CB shall be notified. All communicated shall be recorded.</p> <p>Clause 16.0 ~ Production volume</p> <p>Clause 17.0 ~ Conversion Factors</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 		<p>Clause 18.0 ~ Internal Audit Clause 19.0 ~ Complaints Clause 20.0 ~ Management Review</p> <p>The Assistant Manager had the overall responsibility and authority over the implementation of RSPO supply chain requirement for Derawan POM. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements.</p> <p>DPOM had continued to implement the procedures it had on receiving and processing of RSPO certified and noncertified FFBs. (Refer para. 7.0 of the SOP - Receiving FFB at the Mill) it has described how DPOM manages the FFB from certified source. No issue regarding receiving Noncertified FFB as this mill is a MB Mill.</p>
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Effectively implements and maintains the standard requirements within its organisation. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports. 	YES	<p>As describe under para 18.0 SOP for Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia, audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2020 requirements.</p> <p>RSPO internal audit was conducted in May 2022 by the internal appointed auditors. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 0 NCR were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	YES	<p>Derawan POM had continued to receive certified FFB from own Estate Which is Takau, Derawan, Sahua and Damai Estates. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Monitoring records titled as <i>"RSPO & MSPO Mass Balancing Records for Oil Mills"</i> has recorded the tonnage of certified FFB and its supplying estate.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number 	YES	<p>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 Derawan POM.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	YES	<p>There are 2 outsource company CPO transporter. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. There is a clause regarding Supply chain in the 'annexure 5' of agreement. Record of training was sighted.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	YES	List of contact person for both transporters were made available and up-to-date in the stakeholder list. And was updated on 3/1/22.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	YES	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	YES	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up-to-date.
	ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	YES	Relevant record was maintained for more than 2 years as per '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	Derawan POM has maintained the three-monthly accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record titled as " <i>RSPO & MSPO Mass Balancing Records for Oil Mill</i> ".
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified	YES	The records of the volume purchased (input) and claimed (output) over a period of 12 months was updated in 'RSPO&MSPO Mass Balancing Records for Oil Mill'.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)		
3.8.13	Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	YES	Derawan POM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER). These figures were monitored on daily & monthly basis by the mill using the prepared template (e.g. Monthly Production Report – Physical Movement) to ensure their accuracy as well as monitoring of their ongoing performance. Derawan POM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER). These figures were monitored on daily & monthly basis by the mill using the prepared template (e.g. Monthly Production Report – Physical Movement) to ensure their accuracy as well as monitoring of their ongoing performance.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	YES	Extraction rates has been updated monthly as per stated in Monthly Production Report (Physical Movement)
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100%	YES	Not Applicable

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

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Principle 4: Respect community and human rights and deliver benefits

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

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	YES	Sime Darby Plantations Berhad's Human Rights Charter (revised 2019) provides for protection of Human Rights Defenders, whistle blowers, complainants and community spokespersons. The Group has established a specific Policy on Human Right Defenders, Whistleblowers and Complainants and the Policy had been finalized by GSQM on 25 March 2020. There is also Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC). The HRC was last revised in August 2020. They promote the human rights, safeguard democracy and its institutions and not violate the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, they are committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them. Refer to Policy on the Protection of Human Rights Defenders (HRDs) dated 25/03/2020 for more information. The policies were communicated to stakeholders during stakeholder meetings.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	YES	SDPB has implemented Group Sustainability and Quality Policy Statement where the management is committed to contributing to a better society: 1. Respecting, upholding & no-exploitation of fundamental human rights. 2. Providing safe and healthy workplaces and protecting workers' welfare. 3. Engaging and empowering communities. There is no evidence that SOU Derawan instigates any violence or use any form of harassment in its operations. This was confirmed from interviews conducted with its employees from all levels (staff, workers, security personnel). This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers. Interviewed with the workers confirmed that no harassment by the management.
4.2 There is a mutually agreed and documented system for dealing with complaints and	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	YES	The system used by the SOU 33 Derawan in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Procedures for handling Social Issues". The Mill and Estates within SOU 33 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

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Clause	Indicators	Comply Yes/No	Findings
grievances, which is implemented and accepted by all affected parties.	requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.		external book was reviewed and found no complaints against the CU. Anonymity of complainants and whistle-blowers are ensured under the Sime Darby Code of Business Conduct which provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ. Auditor has received copy of The Group Policies & Authorities (GPA) No. B5 WHISTLEBLOWING POLICY dated 29 AUGUST 2019. 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). SDPB also has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognize the important role Human Rights Defenders, whistleblowers, complainants and community spokespersons play by lodging complaints in confidence. Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	SDPB has implemented Flowchart and Procedure on Handling Social Issues. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing . Besides, the company has implemented "Suara Kami (Platform by Nestle)", "Impactt (Ulula)", "WMU Careline (From Region)" as a platform for the workers to raise any issue. The workers in Derawan CU were briefed on the complaint mechanism during morning muster and social dialog. Besides, external stakeholders were briefed during the stakeholder meeting. Interviewed with the internal and external stakeholders confirmed that they have been briefed and understood on the complaint mechanism implemented by the company.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	YES	Sighted the External Complaint Book have the agreed resolution within timeframe. There was no other major complaint other than housing maintenance issues. The complainant will fill in the complaint form and staff will summarize the issue in Rekod Aduan Kerosakan Rumah. The record captured the complainant issue; house no, complainant date, action taken date, contractor, staff and executive house. There is evidence that parties to a grievance are kept informed of the progress of the complaints. At POM Actions taken following complaints on house defects were informed to the complainants.
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice,	YES	SDPB has implemented Flowchart and Procedure on Handling Social Issues. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels

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Clause	Indicators	Comply Yes/No	Findings
	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.		where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing . Besides, the company has implemented "Suara Kami (Platform by Nestle)", "Impactt (Ulula)", "WMU Careline (From Region)" as a platform for the workers to raise any issue. Furthermore, the company developed the Human Rights Charter to protect Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	YES	There is evidence that contributions to community development was provided based on consultations. There is a donation to the surrounding schools, Mosque and Government agencies. The most important thing is 80% of the staff and non-clerical staff are from surrounding villagers (radius 25km) which is the main Contributions to community development. And also SOU Derawan has set Place for Vaccination Program for surrounding villagers. Derawan CU have contributed to the internal and external stakeholders. As a group, the CSR was included in: http://www.yayasansimedarby.com/our-projects/community-health .
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	YES	Evidence of legal ownership of the land including history of land tenure was verified during this audit. <ul style="list-style-type: none"> a) Takau Estate - the land was previous owned by Derawan Sdn Bhd and Sahua Enterprise Sdn Bhd and then transferred to Austral Enterprises Bhd, b) Derawan Sendirian Berhad and Sahua Enterprise Sdn Bhd has bought the land from Sarawak Government on 20 April 1988. c) Derawan Sendirian Berhad and Sahua Enterprise Sdn Bhd are owned by Golden Hope and after merged with Sime Darby in 2007, The Land Title was transferred under the name of Sime Darby Plantation Bhd. Each estate had legal use of the land through an Ownership signed by the Superintendent of Lands and Surveys of Bintulu following the payment of premium and Land fee.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighboring estate only. Auditor has verified this through external stakeholder meetings and interviewed with estate management and neighboring estates that there was no violence action taken by the Derawan CU in maintaining peace. Derawan CU only employed Auxiliary Police in order to guard their workers, staffs and children life, their belongings and company properties.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected	YES	The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighboring estate only.

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Clause	Indicators	Comply Yes/No	Findings
	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.		SDPB has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	YES	The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighboring estate only. SDPB has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	YES	As above.
	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 above.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	As above.

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Clause	Indicators	Comply Yes/No	Findings
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	YES	As above.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	As above.
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	YES	There is no plan of new development in Derawan CU. The lands occupied by Derawan CU are government provision lease land. As reported in 4.4.1, it has been verified that there is no conflict or dispute over the land. There are no local communities surrounding Derawan CU, all surrounding by SDPB sister estates and neighboring estate only. SDPB has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	YES	No new plantings are established on local peoples' land.in Derawan CU. As above.
	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	YES	No new plantings are established on local peoples' land.in Derawan CU. As above.

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Clause	Indicators	Comply Yes/No	Findings
	certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.		
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	YES	No new plantings are established on local peoples' land.in Derawan CU. As above.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	YES	No new plantings are established on local peoples' land.in Derawan CU. As above.
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	YES	No new plantings are established on local peoples' land.in Derawan CU. As above.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	YES	No new plantings are established on local peoples' land.in Derawan CU. As above.
4.6 Any negotiations concerning compensation for	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes. The procedure has detailed the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third

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

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Clause	Indicators	Comply Yes/No	Findings
	and rights to land for plantation expansion are given opportunities to benefit from plantation development.		estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	YES	The lands occupied by Derawan CU are government provision lease land. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	YES	The lands occupied by Derawan CU are government provision lease land. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements.	YES	The lands occupied by Derawan CU are government provision lease land. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (incl. neighboring communities where applicable).	YES	The lands occupied by Derawan CU are government provision lease land. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.

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Principle 5: Support smallholder inclusion

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

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

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Clause	Indicators	Comply Yes/No	Findings
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	YES	Sime Darby SOU Derawan supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Sighted that latest engagement meeting namely Engagement with smallholders by Group Sustainability in Aug 2022 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 and grievances. Sime Darby Whistleblowing Policy ensures anonymity. The Policy contains the Whistle Blower Complaint Response where the complainant has the option of remaining anonymous by not revealing his/her identity.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	YES	Sime Darby SOU Derawan supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	YES	Sighted that latest Engagement meeting namely Engagement with smallholders by Group Sustainability in Aug 2022 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.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	As above. The CU has bought FFBs from smallholders.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	Sime Darby SOU Derawan supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.

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Clause	Indicators	Comply Yes/No	Findings
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	Currently Sime Darby SOU Derawan has created a system to trace their stakeholder around their estates.

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 'Polisi Kesamarataan Hak' was established in the estate and POM. The policy statements emphasized on worker information, recruitment and selection, training, employee development, terms of service and records of service. This policy is posted on notice boards in the estates/mill office.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Apart from the indicator 6.1.1 policy which states that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees. As confirmed by the workers during interviews and field observation, payment of wages/salaries, provision of housing and access to benefits and amenities is fair based on observation, review of pay checks, contracts of employment, including charging of recruitment fees for migrant workers.
	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	Employment procedures for recruitment, selection, hiring, are documented. For locals, the procedures are in SOP on Hiring of Local workers. The procedure details out the process of hiring (application form, screening, interview, requisition approval from Regional GM, medical check-up and issuance of letter of offer). 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.
	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.

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Clause	Indicators	Comply Yes/No	Findings
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	<p>A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. Meetings were held by the committee. The meetings discussed various issues pertaining to the welfare of the gender committee members. Based on Gender Committee Meeting minute at Derawan POM, Derawan Estate, Takau Estate, Sahu Estate and Damai Estate, it was noted that the committee had discussed the following matters:</p> <ul style="list-style-type: none"> - training on women's rights; - counselling for women affected by violence; - child care facilities to be provided by the growers and millers; - women to be allowed to breastfeed up to nine months before resuming chemical spraying or - usage tasks; and - women to be given specific break times to enable effective breastfeeding.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	<p>The equal opportunities policy is contained within the policy of Group Sustainability and Quality Policy Statement, which states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Policy of Group Sustainability and Quality Policy Statement was displayed on notice boards in both Bahasa Malaysia and English.</p> <p>Comparisons were made of sampled employment contracts and payslips of workers from Indonesia and local workers at SOU Derawan. Evidence is available that sampled workers receive equal pay for equal work.</p>
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	YES	<p>Pay and conditions are documented and made available during the surveillance audit. These are contained in the workers' payslips and employment contracts. Pay slips were sighted and are provided to workers on a monthly basis as confirmed during interview with management. Pay slips for Mill and Estate field workers show breakdown for all work done such as allowances received, deductions, no. of days worked and for the Mill, any overtime hours performed. It was also verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages (Amendment) Order 2020 (from February 2020 onwards) and the Sarawak Labour Ordinance.</p>
	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	<p>Derawan CU issues out contracts of employment to all its foreign employees, and letters of offer of employment to its Malaysian employees.</p> <ol style="list-style-type: none"> a) The contracts detail out payments and conditions of employment (e.g. wages payable, working hours, deductions, overtime, sickness, insurance coverage, retirement age, holiday entitlement, maternity leave, reasons for dismissal, period of termination notice, mutual termination rights, etc). b) The employment contracts were prepared in Bahasa Malaysia which is the

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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.		<p>language understood by the Malaysian and Indonesia workforce. The contents of the contract were explained to them by the management representative.</p> <p>c) Both the workers and the management representative confirmed this during the interview. The workers' understanding was confirmed before they were asked to either sign or thumbprint on their respective employment contracts.</p> <p>d) The Company was not deducting from workers' pay except for statutory deduction i.e SOCSO.</p> <p>Contracts and conditions of employment are contained in employment contracts signed between the Mill and respective estates on one hand, and their workers on the other. The employment contracts sampled were prepared in either Bahasa Indonesia or in dual-language, namely English and the language commonly used in the worker's country of origin. Among others, the contracts defined the period of employment, wage rate, work benefits, overtime, annual leave, public holidays, contract termination, etc. Details on monthly salary and deductions for every worker and staff are reflected in their pay slips which are issued to the workers during pay day. For the local workers, there is evidence that the payment of statutory contributions such as EPF, SOCSO and Employment Insurance Scheme are being made in accordance with the relevant legal provisions.</p>
	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	<p>There is evidence that workers observe regular working hours including overtime hours within the legal confines of the Sarawak Labour Ordinance. This was verified from the mill workers' employment contracts, punch cards and interviews with the workers themselves. They are also entitled to at least 30 minutes' rest after 5 hours of work.</p> <p>Similarly, workers with medical certificates are given a paid medical leave, and female workers are given 3 months maternity leave. There is no evidence of termination, and so compliance with reasons for dismissal and period of notice could not be verified during this audit. Salary deductions are made for statutory deductions such as SOCSO, EPF, and EIS. For non-statutory deductions such as for payment of electricity and water bills, records are available of written permits from the Department of Labour, Sarawak.</p>
	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	YES	<p>Evidence is available that the Derawan CU provide adequate housing and facilities to its employees in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. Houses are provided rent free. Each house has between 2 to 3 rooms and accommodate between 2 to 5 workers. Foreign workers are provided with accommodation as stated in their employment contracts. Local workers too are offered accommodation, but those who are within the local communities prefer to live outside the estate/mill premises. Among the available amenities include football fields, badminton/takraw/volleyball court, children's playground, places of worship, sundry shops and an activity hall. There is evidence that housing inspection are being carried out once a week based on housing inspection records. Records of housing inspections was sighted and available. Water and electricity are also provided, and the bills are shared among occupants and deducted from their wages. Free medical treatment above is provided also</p>

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Clause	Indicators	Comply Yes/No	Findings															
	reasonable time (5 years) is allowed to upgrade the infrastructure.		to all workers and their dependents. The upkeep (sanitation) for all estates linesite visited were observed in good maintained. No water clogging at all. The estates in Derawan CU provided with treated water by water treatment plant and water sampling test was carried out 2 times annually for drinking water for human consumption.															
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	All units have its own canteen and grocery store which sells basic items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within its expiry period. Workers interviewed informed that they purchase items from these stores, but also since the estates and mill are easily accessible to the nearest town, they also go out to the towns. Workers could either pay in cash, or on credit.															
	<p>6.2.6 A “DLW” is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a “decent living wage” is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following:</p> <ul style="list-style-type: none">• An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.• There is annual progress on the implementation of living wages• Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment.• The unit of certification may choose to	YES	<p>All sampled workers receive at least minimum wages based on Minimum Wages Order (Amendmend 2022). Derawan, Takau, Sahua, Damai and Derawan Mill had calculated the prevailing wages and in-kind benefits for their workers. The calculation included housing, electricity, water, transport to work, sports and recreation facilities, education, childcare and healthcare. The breakdown of the prevailing wages calculation as follows:</p> <table><tr><th colspan="3">Derawan CU</th></tr><tr><th></th><th>Local worker (RM)</th><th>Foreign worker (RM)</th></tr><tr><td>Total cost of in-kind benefits per worker</td><td>397.49</td><td>328.84</td></tr><tr><td>Average monthly take-home salary per worker</td><td>1,630.99</td><td>1,748.93</td></tr><tr><td>Total prevailing wages</td><td>2,028.48</td><td>2,077.77</td></tr></table> <p>The auditor had verified the calculation and though the calculation was in line with RSPO Guidance on Calculation Prevailing Wages.</p>	Derawan CU				Local worker (RM)	Foreign worker (RM)	Total cost of in-kind benefits per worker	397.49	328.84	Average monthly take-home salary per worker	1,630.99	1,748.93	Total prevailing wages	2,028.48	2,077.77
Derawan CU																		
	Local worker (RM)	Foreign worker (RM)																
Total cost of in-kind benefits per worker	397.49	328.84																
Average monthly take-home salary per worker	1,630.99	1,748.93																
Total prevailing wages	2,028.48	2,077.77																

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Clause	Indicators	Comply Yes/No	Findings
	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.		
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	All the estates and mill employ full-time employees. Foreign workers are full-time employees but have a contractual duration which is stipulated in their employment contracts which is 2 years for Indonesians and 3 years for other nationalities. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department. All workers in SOU Derawan is a Permanent and full time workers and all the workers used for core work such as Harvesting, Manuring, Spraying, Milling Operation, Grading, Engine driver and workshop. There are no temporary workers use in the SOU Derawan.
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	Records of meetings between SOU Derawan and workers representatives are available.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	YES	Based on interview held at all estates in the CU, the representatives for all workers were freely elected and management does not interfere, unless to facilitate the election. Sighted also latest selection has been done in December 2021 for local and foreign workers.

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Clause	Indicators	Comply Yes/No	Findings
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	YES	The policy on protection of children is contained in the Sime Darby Child Protection Policy dated January 2015. There was no evidence that the estates and the mill at SOU Derawan has employed anyone below the age of 18 years. This undertaking to not hire child labour is included in all service contracts and supplier agreements. Auditor also verify through the contractors in the SOU Derawan and confirmed there was no contractor workers available in the estate and mill. This was verified by examining the master lists of each operating unit where details of the workers' IC numbers and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	YES	There was no evidence that the estates and the mill at SOU Derawan has employed anyone below the age of 18 years. Auditor also verified through the contractors in the SOU Derawan and confirmed there was no contractor workers available in the estate and mill. This was verified by examining the master lists, personal file, contracts and payslip of each operating unit where details of the workers' IC numbers and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed. At Derawan SOU the youngest workers are age 21.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	There was no evidence that the estates and the mill at SOU Derawan has employed anyone below the age of 18 years or young persons. Auditor also verify through the contractors in the SOU Derawan and confirmed there is no Contractor workers available in the estate and mill. This was verified by examining the master lists, personal file, contracts and payslip of each operating unit where details of the workers' IC numbers and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.
	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 to the workers were evident. The training was also given to external stakeholders during stakeholder meeting. Apart from this, there was no evident of child labour in the CU.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	The policy to prevent sexual and other forms of violence is contained in the Sime Darby Social Policy. In addition, awareness on sexual and other forms of harassments are also briefed during muster and Gender Committee meetings held at each Mill and Estates. The Gender Committee Meetings are being held regularly where topics discussed include sexual harassment and violence. Members to lodge complaints if members encounter such incidence. Interviews with female employees confirmed their understanding of what constitutes sexual harassment. Training and awareness program evident.

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Clause	Indicators	Comply Yes/No	Findings
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	YES	The policy to protect reproductive rights of women is contained in the Sime Darby Plantation Gender Policy. Based on interviews conducted and documents reviewed, there is evidence that the Policy is being implemented. Workers interviewed, especially women employees from all levels of the workforce confirmed their understanding of the Policy.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	In the SOU Derawan Gender Committee have been established at the Mill and Estate levels to help disseminate awareness on issues relating to reproductive rights and need of new mothers. Awareness on reproductive rights need of new mothers are also briefed during muster and Gender Committee meetings held at each Mill and Estates. During this audit, there has been no evidence of any new mothers and therefore this indicator could not be verified. However, based on interview conducted with the Gender Committee members at Derawan POM, when she was pregnant, her needs were attended to which included a private room where she could express milk and a fridge for storage were made available. The estate has assessed their needs by interviewing them. The workers have no grievances and needs due to their child was not breastfeed anymore
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	YES	A grievance mechanism which respects anonymity and protects complainants is in place at the CU as per the Sime Darby Gender Committee Handbook. The procedures have been communicated to all levels of workforce. Training regarding grievance mechanism has been briefed to all workers and also during the gender committee.
6.6 No forms of forced or trafficked labour are used.	<p>6.6.1 (C) All workers have entered into employment voluntarily , and the following are prohibited:</p> <ul style="list-style-type: none"> Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty to the workers for termination of employment Debt bondage Withholding of wages 	YES	<p>All workers in SOU Derawan in Estate and Mill have entered into employment voluntarily, it was verify during the interview with Indonesian workers. The workers know they will work in Oil Palm Sector since from their country. The mill and all visited estates had given passport to foreign workers as verified during interviewed with the workers. Workers also confirmed there is no involuntary overtime as they will work for overtime if management ask to, they also understand their that if they want to resign from Sime Darby, the requirement is to give 8 weeks of notice and they also don't have any debt of bondage.</p> <p>Workers also understanding that they need to do as per the agreement to go to Malaysia, and the agent also already explained to them regarding the work they should get in Malaysia which is in oil palm plantation. According to the interviewed workers, the Agent had explained and show picture to them that they are going to work in oil palm plantation and the workers were satisfied with their earning at Sime Darby.</p> <p>Migrant workers recruitment procedure para 3.3, no charging of recruitment fees from the migrant workers. In the procedure, they stressed on the following official costs and SDP pay for the following:</p> <ol style="list-style-type: none"> 1. Levy (work permit) 2. Calling visa (PLKS+processing fee+visa fee) 3. Bestinet (Online medical + visa fee + [processing fee])

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Clause	Indicators	Comply Yes/No	Findings
			4. Medical examination (FOMEMA) 5. Immigration Security Clearance 6. One Stop Centre (applicable in India only) 7. Transport from origin to Malaysia (round trip) 8. Agent fees
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	The SOU Derawan adopts the Social Policy which states that "All employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work and representation race, caste, nationality". There is also a procedure entitled "Sourcing Process for Foreign Workers". Based on observations and interviews of foreign workers (harvesters, sprayers, mill workers), there is no evidence of contract substitution and no discriminatory practices against foreign workers. A post-arrival briefing is also given, in particular on the contents of their employment contracts, safety, benefits, etc.
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	YES	Estate / Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Manager subsequently assigned duties of OSH coordinator (secretary) to the Assistant Manager or Healthcare Assistant for the down line implementation of OSH practices in the estate and mill. All identified committee were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. OSH Committee meetings were held once in three months. Review of the minutes of the meeting carried out during audit. OSH Committee meetings confirmed that among the agenda discussed, included the following: <ul style="list-style-type: none"> ▪ Passing of previous minutes and arising matters ▪ OSH objective and program ▪ Workplace inspection ▪ OSH act & regulation implementation ▪ Safety tools & PPE enforcement ▪ Accident report (Monthly Data of Mill/Estate Safety Performance) ▪ Internal & external complaint ▪ Trainings and competency
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned	YES	Emergency Response Plans and Procedures were available in the estates and mills to address potential emergencies such as Flood, Fire, Chemical Spillage, Poisoning, Earthquake/landslide, Accidents, Storm and Wild/ Poisonous Animal Attacks. The plans have been posted at notice boards in the mills and estates and communicated to the workers. Emergency contact numbers have been posted at the notice boards and provided to the workers as well. Interview with the workers such as mandores and store attendants indicated that the workers are aware on the available emergency response plans. Trainings were conducted in the mill and estates to provide awareness to the workers on emergency

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Clause	Indicators	Comply Yes/No	Findings
	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.		responses. SOP of incident, accidents & non-conformance management dated 30/05/2019. Covering Crisis management and Emergency Response Plan. Master list of first aid box of all estates which is available at the office was checked and verified. Observed that, first aid box is well provided for all the field mandores whose involved in harvesting, manuring and spraying works. The content of first box which is held by harvesting, manuring and spraying mandore was verified. The content such as bandage, gauze, triangular bandage, cotton wool, plaster, handy plaster, flavin lotion, antiseptic cream, surgical gloves and scissor were well equipped. Site inspection evidence that first aid kit is available at all works place with complete contents. The stock of first aid box is regularly check and refill, when necessary, by estate Medical Assistant. Telephone numbers and names of the members of the Emergency Response Team (ERT) were communicated to all employees and displayed at notice boards. Telephone numbers of the PIC, Police Station, Fire Brigade, and Government Clinic were also included. Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury record were recorded using Lost Time Accident (LTA) metrics. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting.
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	YES	All staff and workers such as the storekeepers, mill workers/operators, harvesters and sprayers/manurers, machineries driver, etc. were continuously trained in safe working practices as per Safety Work Procedure (SWP) for PPE related to their job function. PPE were given to workers based on HIRARC and SWP recommendations suitable for the job position or hazardous operation undertaken. During field inspection at Mill Workstation, Harvesting Operation, Manuring Operation, Circle Spraying Operation and OP Nursery Operations, sighted they were seen to wearing PPE such as face masks respirators, goggles, harvesting shoes, rubber boots, nitrile/cotton gloves, apron and safety helmet/straw hat, to cover all potentially hazardous operations. The condition of each PPE item and their validity lifespan were found good. Records of PPE issued, and acknowledgement of receipt are maintained individually for all category of workers at mill and estates. In addition to basic PPE, special PPE are also provided for workers assigned to dangerous operation such as work at height and in confined space. All workers were provided with appropriate PPE where the cost is bared by the management. Interviews conducted during the site visit at the mill and all estates showed understanding and approval from the workers that the management bares the cost of all PPEs and the workers are entitled to valid PPE, the importance of using required PPE at all times during work and proper storage and disposal methods of PPE. Additionally, sighted sanitation facilities for those applying pesticides were available near to chemical store area, after completed spraying activities, the workers will change out of PPE, wash and put on their personal clothing at the area. Clothing lockers are provided for mill and estate workers to change their street clothing to work clothing and vice versa at the end of their work shift.

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Clause	Indicators	Comply Yes/No	Findings
			Meanwhile, during site inspection estate and mill workshop, most of the moving part and rotating machinery were installed with machine guarding and properly covered. Noted also the set of oxygen and acetylene cylinders in the workshop available with “flash back arrestors”.
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	YES	Medical care and accident insurance is provided to all employees, both Local and Foreign workers under Employees’ Social Security Act 1969 (Act 4). Sighted the last three months’ payment made to SOCSO on Form 8A for foreign and local workers at the POM and all estates were available for reviewed.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	SOP of incident, accidents & non-conformance management as guidance and mechanism. Occupational injuries are recorded using Lost Time Accident (LTA) metrics via monthly data of estate/mill safety performance via Rapid4 System. Sighted the Derawan CU has maintained and updated the LTA Summary by monthly basis. For accidents records 2021, The CU managed to submit the JKKP 8 form to DOSH before 31/01/2022, via MyKKP System.

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

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

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	<p>As for all SDPB estates, Derawan Estate, SahauEstate, Takau Estate and Damai Estate had in place documented integrated pest management (IPM) systems. The procedure referred was in 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. The IPM technique for rats includes rearing barn owls (<i>tyto alba</i>), bagworm control includes the planting of beneficial plants such as <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i> and <i>Turnera sublata</i> and for rhino beetles is by using pheromone trap.</p> <p>All estates carried out monthly detection and observation of leaf eating pests, rat damage and diseases like Ganoderma. These detection and observations were carried by staff. When damaged/disease was observed, proper census was then carried out. Records showed no outbreak had been taken place.</p> <p>During the audit, it was observed a number of beneficial plants had been planted and all estates had plants in polybags, ready for planting in the Nursery. Records showed that beneficial plants were continuously planted in by all estates visited.</p> <p>Rat damage census is carried by the Mill for all Estates on harvested bunches while the Estates carried Ganoderma Census. Rat baiting was by calendar baiting at 2 campaigns per year. Baiting was carried until the acceptance less than 20%</p>

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Clause	Indicators	Comply Yes/No	Findings
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	There was no evidence that species referenced in the Global Invasive Species Database and CABI.org are to be used in managed areas, as per site visited and as per the stakeholder consultation with relevant workers.
	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	All 4 Estates in Derawan CU continued to use the Sime Darby Plantation Berhad's policy of no open burning. As advocated, all estates practiced Zero burning thus no use of fire for pest control. Furthermore, there had been no serious pest damage in all 4 Estates visited.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	Justification of all pesticides used is demonstrated on Derawan CU. Selective products and application methods that are specific to the target pest, weed or disease are prioritized Tennamaram CU continued to use agrochemicals based on its Agricultural Reference Manual (ARM): <ul style="list-style-type: none"> • Section 7, - Field Upkeep, Sub section 6 – Weeding Guidelines, • Section 15 – Crop Protection and • Section 16 – Weed Control, • Section 17 – LCC establishment - Sub section – 7 weeding • SSOP and • Pictorial Safety Standard Book (PSS) where written justifications had been provided for various fields operations. The Manual has included a chemical register list which indicates the use of selective products that are specific to the target pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs.
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	YES	All 4 estates continued to have records to show the types of pesticides used with active ingredients and their LD50, where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan,	YES	All estates continued to minimise the usage of agrochemicals by implementing IPM. Blanket spraying was not practiced by this CU and soft grasses maintained in the field. It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the Agricultural Reference

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	eliminated where possible, in accordance with IPM plans.		Manual (ARM) Section 15 -Plant Protection. As part of the IPM plans, management of all estates had established nectariferous beneficial plants (<i>Cassia cobanensis</i> , <i>Antigonan leptopus</i> and <i>Turnera sublata</i>) nurseries for continuous planting in order to attract natural predators and thus to reduce use of insecticides. During the visit it was observed a number of beneficial plants had been planted and all 3 estates had plants ready for planting in the nurseries.																																				
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	Prophylactic use of pesticides as identified in national best practice guidelines was in use in replanting areas and in Oil Palm Nurseries. In immature oil palm areas prophylactic spraying using diluted cypermethrin was carried out against Rhinoceros beetles 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	Based on chemical register, chemical bin cards, chemical stock purchase, and chemical stores it was noted that the estates confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000. a) The review of the chemical register concluded that all pesticides used were of class II, III & class IV. The Chemical registers were updated accordingly. b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. c) Sighted from records and interviews with workers, staff and estate assistants, concluded that training was held with all precautions being taken and all legal requirements met. The chemical used in the estates among others as listed below; <table><tr><th></th><th>Chemical name</th><th>Class</th><th></th><th>Chemical name</th><th>Class</th></tr><tr><td>1</td><td>Glyphosate iso p/amine</td><td>III</td><td>6</td><td>Cypermethrin</td><td>III</td></tr><tr><td>2</td><td>Sodium chlorate</td><td>III</td><td>7</td><td>Tric butoxy ester</td><td>III</td></tr><tr><td>3</td><td>Glufosinate ammonium</td><td>III</td><td>8</td><td>Canyon 20G</td><td>IV</td></tr><tr><td>4</td><td>Triclopyr butoxy</td><td>III</td><td>9</td><td>Caumatetrayl 0.03</td><td>III</td></tr><tr><td>5</td><td>Metsulfuron methy 20%</td><td>III</td><td>10</td><td>Bayfolan</td><td>III</td></tr></table>		Chemical name	Class		Chemical name	Class	1	Glyphosate iso p/amine	III	6	Cypermethrin	III	2	Sodium chlorate	III	7	Tric butoxy ester	III	3	Glufosinate ammonium	III	8	Canyon 20G	IV	4	Triclopyr butoxy	III	9	Caumatetrayl 0.03	III	5	Metsulfuron methy 20%	III	10	Bayfolan	III
	Chemical name	Class		Chemical name	Class																																		
1	Glyphosate iso p/amine	III	6	Cypermethrin	III																																		
2	Sodium chlorate	III	7	Tric butoxy ester	III																																		
3	Glufosinate ammonium	III	8	Canyon 20G	IV																																		
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5	Metsulfuron methy 20%	III	10	Bayfolan	III																																		

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	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	<p>7.2.5 a-e. As mentioned above in 7.2.5 of this checklist and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. The Estates had only used Class III and Class IV chemicals. Hence, the need</p> <p>a) for a judgment of the threat and verification as to it being a major threat does not apply in Derawan CU.</p> <p>b) to assess other alternatives is not required.</p> <p>c) to which process was applied to verify why there is no other less hazardous alternative are not required</p> <p>d) to limit the negative impacts of the application does not arise.</p> <p>e) to estimate timescale of the application and steps taken to limit application to the specific outbreak does not arise.</p>
	7.2.5b Why there is no other alternative which can be used.	YES	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES	
	7.2.5d What is the process to limit the negative impacts of the application.	YES	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	YES	<p>Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the product.</p> <p>a) The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were all trained and that they had understood the hazards involved and how the chemicals should be handled in a safe method</p> <p>b) The trade and generic names of the chemicals were made known to the workers through the SDS training. SDS was also displayed at all storage areas as observed during the audit.</p> <p>c) The training included the safety aspects and usage of PPE when handling with pesticides. All workers involved in pesticide application were provided with appropriate PPE and replaced when worn-out. PPE issuance & replacement records were verified by the auditors.</p> <p>d) Training in relation to pesticides & chemical handling among others as shown under indicator 3.7.2. The estates and mill had a SOP for handling of chemical/pesticide management. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. It was also observed that PPE was used by workers working in the fields. The trade and generic names of the chemicals were made known to them through the SDS training. It was also noted that SDS are available at chemical and fertilizers during the audit.</p>
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	<p>The chemical stores in the estate were found to be in compliant with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149).</p> <p>a) Records of purchase, storage and use were maintained.</p> <p>b) All stores were well secured and equipped with exhaust fans.</p> <p>c) Only authorized personnel are assigned to handle the chemicals.</p> <p>d) All the chemicals were segregated in storage accordingly.</p>

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Clause	Indicators	Comply Yes/No	Findings
			<p>Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Disposal are made together with the scheduled waste disposal under SW410. Pesticides selected for use were those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with OSH USECHH Regulations (2000). At all visited mill and estates the storage of pesticides was in accordance with recognized best practices. They were stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OHS CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were found available in Bahasa Malaysia language understood by workers or explained carefully to them by a plantation management official at operating unit level. 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 to the ground. Triple rinsing activities continued to be implemented for empty pesticide containers. The detailed procedure for this purpose is available in SOP for Scheduled Wastes Management and SOP for Triple Rinsing.</p> <p>At all estates and POM visited, their chemical stores were inspected, and it was noted that they all comply with the relevant act as well as best practice.</p>
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	Standard Operating Procedure Scheduled Waste Disposal of empty pesticide containers were carried out as per established procedures. Triple rinsing procedures was continually implemented for empty pesticide containers and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Records on usage and disposal were well recorded and documented.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	YES	Aerial application of agrochemicals is not practiced in all SDP estates in the CU. This was confirmed through observation during the site visit and interview with the employees.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and	YES	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions was demonstrated and implemented.

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Clause	Indicators	Comply Yes/No	Findings
	documented action to treat related health conditions, is demonstrated.		
	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	<p>The estates in the CU complied with procedure and guidelines provided in the Polisi Pengendalian Racun Perusak Bertoksik Tinggi signed by the CEO dated 02/12/2019 whereby no work with pesticides is given to pregnant or breast-feeding women. Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan).</p> <p>The estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.</p> <p>Derawan CU has established Human Right Carter revised 2020 under point number 3.2.5, where respecting reproductive right and maternal rights. All estates and POM visited prohibited all confirmed pregnant and breast-feeding woman to work with pesticides as per internal memo signed by the Assistant Manager. The memo has been displayed on the notice board at few strategic places in the estate. The identification of pregnancy was done by the MA/HA based on interview with their women workers on the last menstrual period dates. This interview was done during the monthly medical check-up. Pregnancy test was carried on doubtful cases. Monthly medical check-up for women sprayer was also being carried out by VMO. There was no evidence that the work with pesticides was undertaken by pregnant or breast-feeding women. This has also been confirmed through interviewed with workers.</p>
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	<p>Waste management plan is developed based on the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. Generally, the scheduled wastes were disposed through licensed vendors, organic wastes were disposed through estate landfill and recyclable wastes were sent to recycle centers. Besides, industrial waste such as POME, EFB, boiler ash, decanter cake and scrap metal were applied to field application, monitoring of POME and sell to third party.</p> <p>The collected waste being segregated at the waste collection site for recyclable and non-recyclable. During field assessment at the waste collection centers / landfills, it was observed that all waste are completely buried. No waste scattered at the surrounding area.</p> <p>At waste storage area, it was found that recyclable and hazardous waste were kept separate at designated storage area. Scheduled wastes are completely labelled and stored with secondary containment and spill kits. No evidence of spills observed during site visit. Moreover, sighted that there is no practice of open fires within all estates. Monitoring is done weekly in both domestic waste collection areas.</p>
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	<p>The disposal of type of waste are as per the waste management plan dated FY 2021. Interview with the waste disposal site workers confirmed that they understand about the waste segregation. For the hazardous waste, disposal waste made by DOE's license contractor. Sime Darby Industries (SDI) is contracted to perform vehicle maintenance and upon completing the maintenance, the wastes are being collected. The DOE approval for such activity by SDI was sighted. Other waste of waste such process/biomass waste (fibre/shell) is being fully optimised for boiler fuel whereas EFB is used for</p>

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Clause	Indicators	Comply Yes/No	Findings
			mulching and sent to Derawan and Takau Estate. It was found that scheduled wastes generated at the mill stored more than 180 days, and sighted approval letter of extension scheduled wastes stored more than 180 days from DOE.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit at all estates and POM, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at Derawan CU have been disposed via estate landfill.
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	All 3 estates practiced the maintenance of long-term soil fertility by annual application of fertilisers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and some EFB and compost application. Maintaining soil fertility was guided by the following: i) ARM Section 2 – Nursery Techniques ii) ARM Section 4 – Land Preparation iii) ARM Section 8 - Manuring. iv) ARM Section 17 – Leguminous Cover Crop Establishment In addition, Fertilizer application, which was of paramount importance for maintenance of soil fertility, were carried out based on the recommendation made by the agronomist from Sime Darby Research Sdn. Bhd. Annual fertilizer recommendations were made based on annual foliar sampling while soil sampling was carried out on a 5-year cycle basis by Sime Darby Research Sdn. Bhd. The recommendation by the Agronomist were also available during the inspection and the application of fertilizers had been carried out as recommended and scheduled.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	Periodic tissue and soil sampling were carried out in the Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitor the changes in the organic carbon and total nitrogen. For all estates Agronomic assessment and fertiliser recommendation was conducted by Sime Darby Research Sdn. Bhd. to of formulate the FY2023 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been carried out in all estates.
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	YES	All 4 estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of compost. In addition, during replanting, palms were felled, chipped, windowed and left to decompose.
	7.4.4 Records of fertiliser inputs are maintained.	YES	Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc. Review of the records revealed that the actual fertilizers applied in 2021/2022 was in line with the program.

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Clause	Indicators	Comply Yes/No	Findings																																																																																																																																								
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	<p>Soil Maps prepared by Precision Agriculture Unit of SDPB R & D. were made available to auditors. There were no fragile/marginal soils in all estates, except for 3.78 Ha with Peat Soil (Gali soil series) on Takau Estate in P95TG (1.05 Ha) and P95 TH (2.73 Ha). As per the soil maps provided the soil series and % were as follows:</p> <table><tr><td>Derawan</td><td></td><td>Damai</td><td></td><td>Sahua</td><td></td><td>Takau</td><td></td></tr><tr><td>Soil</td><td>%</td><td>Soil</td><td>%</td><td>Soil</td><td>%</td><td>Soil</td><td>%</td></tr><tr><td>Bedup</td><td>36.29</td><td>Bedup</td><td>18.67</td><td>Bedup</td><td>19.59</td><td>Bedup</td><td>25.50</td></tr><tr><td>Bekenu</td><td>42.26</td><td>Bekenu</td><td>42.23</td><td>Bekenu</td><td>72.69</td><td>Bekenu</td><td>25.33</td></tr><tr><td>Derawan</td><td>1.99</td><td>Derawan</td><td>15.28</td><td>Bukit Tuku</td><td>1.42</td><td>Bukit Tuku</td><td>1.86</td></tr><tr><td>Marang</td><td>0.49</td><td>Nyalau</td><td>5.02</td><td>Derawan</td><td>4.05</td><td>Derawan</td><td>15.10</td></tr><tr><td>Nyalau</td><td>4.99</td><td>Saratok</td><td>0.02</td><td>Marang</td><td>0.31</td><td>Gali</td><td>0.18</td></tr><tr><td>Saratok</td><td>0.82</td><td>Semerak</td><td>16.82</td><td>Nyalau</td><td>1.49</td><td>Gong Chenak</td><td>1.55</td></tr><tr><td>Semerak</td><td>10.73</td><td>Sibuga</td><td>1.23</td><td>Saratok</td><td>0.41</td><td>Kampong Pusu</td><td>5.23</td></tr><tr><td>Sibuga</td><td>0.51</td><td>DLD</td><td>0.73</td><td>Sibugay</td><td>0.04</td><td>Nyalau</td><td>10.93</td></tr><tr><td>DLD</td><td>1.92</td><td></td><td></td><td></td><td></td><td>Organic Clay</td><td>0.46</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td><td>Saratok</td><td>2.21</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td><td>Semerak</td><td>9.22</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td><td>Sibuga</td><td>1.49</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td><td>Unclassified</td><td>0.94</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td></td><td>100.00</td><td></td><td>100.00</td><td></td><td>100.00</td><td></td><td>100.00</td></tr></table> <p>DLD - Disturbed land</p> <p>Subsidence of peat in this small area of 3.78 Ha of Peat soil series found in Takau Estate in Blocks P95TH 2.73 Ha & P95TG 1.05 Ha is being monitored. Topography/slope/elevation Maps dated March 2019 prepared by R&D Precision Agriculture Unit of Sime Darby Research unit showed that there were no steep terrain in Derawan, Sahau and Takau Estates while on Damai there was only very small area with terrain above 25 degrees.</p>	Derawan		Damai		Sahua		Takau		Soil	%	Soil	%	Soil	%	Soil	%	Bedup	36.29	Bedup	18.67	Bedup	19.59	Bedup	25.50	Bekenu	42.26	Bekenu	42.23	Bekenu	72.69	Bekenu	25.33	Derawan	1.99	Derawan	15.28	Bukit Tuku	1.42	Bukit Tuku	1.86	Marang	0.49	Nyalau	5.02	Derawan	4.05	Derawan	15.10	Nyalau	4.99	Saratok	0.02	Marang	0.31	Gali	0.18	Saratok	0.82	Semerak	16.82	Nyalau	1.49	Gong Chenak	1.55	Semerak	10.73	Sibuga	1.23	Saratok	0.41	Kampong Pusu	5.23	Sibuga	0.51	DLD	0.73	Sibugay	0.04	Nyalau	10.93	DLD	1.92					Organic Clay	0.46							Saratok	2.21							Semerak	9.22							Sibuga	1.49							Unclassified	0.94										100.00		100.00		100.00		100.00
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	Total	100.00	100	100.00	100.00																																																			
7.5.2 No replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	On all 4 Estates no replanting on steep slopes were observed. There is only a very small area of above 25 degrees slopes on Damai Estate – 0.19%. Thus this Indicator is not applicable.																																																						
7.5.3 There is no new planting of oil palm on steep terrain.	YES	On all 4 Estates no replanting on steep slopes were observed. There is only a very small area of above 25 degrees slopes on Damai Estate – 0.19%. Thus, this Indicator is not applicable.																																																						
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	YES	As per all SDPB Estates, to demonstrate the long-term suitability of land for palm oil cultivation, Derawan CU have conducted soil surveys identifying marginal and fragile soils, and terrain surveys including steep terrain, As mentioned under indicator 7.5.1 soil maps and slope classification maps had been prepared by Precision Agriculture Unit of SDPB R & D.																																																					
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	As mentioned in 7.6.1 of this checklist and based on audit findings, there is no new planting in SOU Derawan. Hence the requirement for the availability of maps identifying marginal and fragile soils does not apply.																																																					
	7.6.3 Soil surveys and topographic information guide	YES	The management of all 4 Estates continued to use Soil surveys and topographic information guide, from Soil & Slope Maps prepared by R & D Precision Agriculture Unit, in the planning of drainage and																																																					

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	the planning of drainage and irrigation systems, roads and other infrastructure.		irrigation systems, roads and other infrastructure..
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	YES	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and through site visit to estate. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Estates in Derawan CU.
	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	Areas of peat within the managed area have been inventoried, documented and reported to RSPO Secretariat.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	Soil Maps prepared by Precision Agriculture Unit of SDPB R & D. were made available to auditors. As per the latest survey there is only a very small area, 3.19 Ha of Peat Soil (Gali soil series) on Takau Estate in P95TG (1.05 Ha) and P95 TH (2.37 Ha). Subsidence of peat soil at this area is being monitored. Equipment/Tools are prepared as per the ARM. The monitoring of peat soil subsidence was guided by the following; <ul style="list-style-type: none"> a) Item 2 – Optimal Water Levels for Coastal/Peat Soil and b) Item 4 – Water-table monitoring of Chapter 10 of Sime Darby Agricultural Reference Manual – Water Management in Coastal and Peat Plantings. c) Guidance in the “Peat Subsidence Gauge Installation SOP” dated 14/03/2016 <p>Though the peat area was very small Takau Estate also continued to monitored water levels using water level markers in drains and water tubes.</p>
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	Takau Estate continued to have in place water and ground cover management. The water and ground cover management program are maintained as per the document in the Sime Darby Agricultural Reference Manual (Water Management in Coastal and Peat lands).
	7.7.5 (C) For plantations planted	YES	Records showed that a Pilot Trial on “Peat Drainability Assessment for Sarawak” had been conducted

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	<p>on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>		<p>between May 2017 to May 2018 and report was published in October 2018. The assessment covered Belian, Lavang Special, Lavang, Rasan, Dulang, Pekaka and Ruai Estates of SOU 31 & 34 which was of about 4,500Ha. The entire area had been classified into 3 Basins.</p> <ul style="list-style-type: none"> a) Basin 1: Pekaka Estate & Field 2012A of Dulang Estate which was drained by Sg. Belenge. b) Basin 2: All of Dulang Estate except Field 2012A which was drained by Sg. Paroh. c) Basin 3: Belian, Lavang Special, Lavang, Rasan and Ruai Estates which was drained by Sg. Labang. <p>For the conclusion, on SOU 31 & 34, Basin 1 & Basin 2 are classified as Class 1, while basin 3 is classified ranging between Class 1 and Class 2. Based on this report all peat areas in SOU 31 & SOU 34 can be replanted. During this audit there was another trail/survey was made by STROPI State Government of Sarawak in Nov 2021 for Lavang, Rasan and Belian Estates. Report and outcome have yet to be produced at time of visit.</p>
	<p>7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and</p>	YES	<p>There were no other fragile soils other than peat soils as mentioned under indicator 4.3.1. The management strategy in place for peat soil was guided by;</p> <ul style="list-style-type: none"> a) Item 2 – Optimal Water Levels for Coastal/Peat Soil and b) Item 4 – Water-table monitoring of Chapter 10 of Sime Darby Agricultural Reference Manual – Water Management in Coastal and Peat Plantings. c) Guidance in the "Peat Subsidence Gauge Installation SOP" dated 14/03/2016.

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	associated audit guidance.		The estates monitored water levels using water level markers in drains and water tubes for ground water levels.
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2018) and associated audit guidance.	YES	Not applicable as there are no unplanted and set-aside peatlands in the Derawan CU.
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 estates and POM 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. The continued availability of water sources and to avoid negative impacts on other users in the catchment and watercourse has been conclude in the Environmental Monitoring Report (EMR) was conducted by ESI Sampling Sdn. Bhd.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	Based on stakeholder consultation with local communities and field visit, there was evidence that the CU does not restrict access to clean water or contribute to pollution of water used by communities. 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.
	7.8.1b Workers have adequate access to clean water.	YES	As verified at Derawan CU facilities for workers and through interview with workers, all workers have obtained adequate access to treated clean water. Cleanliness of drinking water supplied to worker was ensured by carrying water analysis. Drinking water quality has been monitored by Sime Darby Plantation Research Sdn. Bhd. by monthly basis. Based on the result, water quality monitoring is generally within Class IIB of NWQSM at all monitoring points.

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	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 Derawan Estate (Field P14A/P14D), Sahu Estate (Field P18C), sighted chemical spraying activities was carried out close to the water edge at the artificial drainage and waterways that directly channel to riparian reserve (Sg. Takau/Sg. Similajau). This practice was not in line with RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). As a result, Major NCR DA 01 2022 was raised.
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	YES	Mill effluent is treated operation was in compliance with national regulations. Effluent license renewal application for year 2022/2023 and letter from Department of Environmental Sighted License signed by Director of DOE. Effluent Treatment Plant (ETP) and Polishing Plant are available at Derawan POM to treat the POME. Effluent treatment process flow sighted in the Lay Out Effluent Pond. Stated in the process flow is the maximum mill capacity per hour is 40mt ffb/hr. According to DOE's license, the disposal method of the final discharge is through watercourse – Sg. Takau. The ETP was regularly maintained by desludging of the ponds to ensure its efficiency. Final discharge samples were taken on monthly basis and sent to an accredited laboratory for analysis. Among the parameters required by the DOE to be monitored are bio-oxygen demand (BOD), suspended solid (SS), oil and grease (O&G), ammoniacal nitrogen (AN) total nitrogen (TN) and pH value. The results of analysis were submitted to the DOE on quarterly basis. All parameters were within the regulatory limit such as BOD discharged to land irrigation was not more than 20 mg/l. Lab Report for final discharge were carried out by accredited laboratories (ESI Laboratory Sdn. Bhd.) on monthly basis. The result was within the limit. The last test was carried out on 06/09/2022. The quarterly report was sent to DOE accordingly and the last was sent on 06/07/2022 for second quarter (April to June 2022).
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Process water is obtained from water catchment near to the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis. The following were sampled: A slight inconsistent trend was noted. This was due to process cleaning of the mill.
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	<p>The plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented. Record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Among the plan for improving fossil fuel are:</p> <ul style="list-style-type: none"> ▪ Closely monitored operation of tractors ▪ Minimise the electricity usage at workers housing ▪ Replace light bulb with energy saving bulb ▪ To switch off and unplug all the electrical equipment after used ▪ Minimise the lubricant oil usage through using small tractor for FFB evacuation <p>There is no genset operator applied at all operating unit. Mostly electricity supplied at operating unit via SESCO (Sarawak Energy). Derawan CU, showed evident that they are compiling the data by monthly</p>

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			basis and document it for further action to improve on their efficiency of using the renewable and non-renewable energy.																																																							
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	YES	<p>The CU had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. For input FY 2021, the report sends to RSPO on 26/06/2022. The input data was verified, and the following were determined:</p> <table><tr><th>Description</th><th>tCO₂e/tProduct</th><th>Production</th><th>t/yr</th></tr><tr><td>CPO</td><td>0.96</td><td>FFB Processed</td><td>125,407.00</td></tr><tr><td>PK</td><td>0.96</td><td>CPO Processed</td><td>26,962.39</td></tr></table> <table><tr><th>Land Use</th><th>Ha</th></tr><tr><td>OP Planted on Mineral Soil</td><td>18185.04</td></tr><tr><td>OP Planted on Peat Soil</td><td>37.15</td></tr><tr><td>Total oil palm planted area</td><td>18222.19</td></tr><tr><td>Conservation (forested)</td><td>210.50</td></tr><tr><td>Conservation (non-forested)</td><td>398.60</td></tr></table> <p>Milling extraction rate:</p> <table><tr><td>OER</td><td>21.50</td></tr><tr><td>KER</td><td>5.11</td></tr></table> <p>Mill Emission</p> <table><tr><th>Emission source</th><th>tCO₂e</th><th>tCO₂e/tFFB</th></tr><tr><td>POME</td><td>0.00</td><td>0.00</td></tr><tr><td>Fuel consumption</td><td>32.13</td><td>0.00</td></tr><tr><td>Grid electricity utilisation</td><td>0.00</td><td>0.00</td></tr><tr><td colspan="3">Credits</td></tr><tr><td>Export of excess electricity to housing & grid</td><td>0.00</td><td>0.00</td></tr><tr><td>Sale of PKS</td><td>0.00</td><td>0.00</td></tr><tr><td>Sale of EFB</td><td>0.00</td><td>0.00</td></tr><tr><td>Total</td><td>32.13</td><td>0.00</td></tr></table>	Description	tCO ₂ e/tProduct	Production	t/yr	CPO	0.96	FFB Processed	125,407.00	PK	0.96	CPO Processed	26,962.39	Land Use	Ha	OP Planted on Mineral Soil	18185.04	OP Planted on Peat Soil	37.15	Total oil palm planted area	18222.19	Conservation (forested)	210.50	Conservation (non-forested)	398.60	OER	21.50	KER	5.11	Emission source	tCO ₂ e	tCO ₂ e/tFFB	POME	0.00	0.00	Fuel consumption	32.13	0.00	Grid electricity utilisation	0.00	0.00	Credits			Export of excess electricity to housing & grid	0.00	0.00	Sale of PKS	0.00	0.00	Sale of EFB	0.00	0.00	Total	32.13	0.00
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			<div>Plantation / field emission</div> <table><tr><td></td><td colspan="3">Own</td></tr><tr><td>Emission sources</td><td>tCO2e</td><td>tCO2e/ha</td><td>tCO2e/FFB</td></tr><tr><td>Land Conversion</td><td>66342.80</td><td>8.00</td><td>0.54</td></tr><tr><td>CO2 Emissions from Fertiliser</td><td>3187.13</td><td>0.38</td><td>0.03</td></tr><tr><td>N2O Emissions from Peat</td><td>99.19</td><td>0.01</td><td>0.00</td></tr><tr><td>N2O Emissions from Fertiliser</td><td>1976.51</td><td>0.24</td><td>0.02</td></tr><tr><td>Fuel Consumption</td><td>630.93</td><td>0.08</td><td>0.01</td></tr><tr><td>Peat Oxidation</td><td>643.95</td><td>0.08</td><td>0.01</td></tr><tr><td colspan="4">Sinks</td></tr><tr><td>Crop Sequestration</td><td>-60830.55</td><td>-7.33</td><td>-0.50</td></tr><tr><td>Conservation Sequestration</td><td>-2325.24</td><td>-0.28</td><td>-0.02</td></tr><tr><td>Total</td><td>9724.71</td><td>1.17</td><td>0.08</td></tr></table> <div>Palm Oil Mill Effluent (POME) Treatment</div> <table><tr><td>Diverted to compost</td><td>0%</td></tr><tr><td>Diverted to anaerobic digestion</td><td>100%</td></tr></table> <div>Diverted to Anaerobic Digestion</div> <table><tr><td>Diverted to anaerobic pond</td><td>100%</td></tr><tr><td>Diverted to methane capture (flaring)</td><td>0%</td></tr><tr><td>Diverted to methane capture (electricity generation)</td><td>0%</td></tr></table>		Own			Emission sources	tCO2e	tCO2e/ha	tCO2e/FFB	Land Conversion	66342.80	8.00	0.54	CO2 Emissions from Fertiliser	3187.13	0.38	0.03	N2O Emissions from Peat	99.19	0.01	0.00	N2O Emissions from Fertiliser	1976.51	0.24	0.02	Fuel Consumption	630.93	0.08	0.01	Peat Oxidation	643.95	0.08	0.01	Sinks				Crop Sequestration	-60830.55	-7.33	-0.50	Conservation Sequestration	-2325.24	-0.28	-0.02	Total	9724.71	1.17	0.08	Diverted to compost	0%	Diverted to anaerobic digestion	100%	Diverted to anaerobic pond	100%	Diverted to methane capture (flaring)	0%	Diverted to methane capture (electricity generation)	0%
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	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	YES	Auditor has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Derawan CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.																																																										

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Clause	Indicators	Comply Yes/No	Findings
	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.
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	As mentioned in 7.6.1 of this checklist and based on audit findings, there is no new planting in SOU Derawan. There was no land preparation of existence or new planting in the entire estates in SOU 33 by burning ever since SDB practiced zero burning as per the policy in: a) EQMS-SOP-SectionB2 - Under felling/clearing & land preparation b) Carbon Policy As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for the OP cultivation.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	The organization had established Emergency preparedness and response with extend for the company zero burning policy to neighbors in areas within 5km radius from estate boundaries. Emergency maintenance of firefighting equipment been conducted by Regional SQM dept in July 2021 and been close monitor the rectification process by operating unit. Sighted the Fire emergency drill 2021 for each estate carried out within the month of Nov 2021.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	Engagement with stakeholders for SOU 33 had been conducted on 4 th November 2021 and minutes shown agenda on fire prevention and control measures been discussed.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	YES	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Derawan CU since Nov 2005.
	7.12.2 (C) HCVs, HCS forests and other conservation areas	YES	SOU Derawan has reviewed their HCV with new assessment conducted on June 2017. The new HCV assessment titled 'HCV Assessment For Sarawak Zone. which included both the planted area and

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Clause	Indicators	Comply Yes/No	Findings
identified and protected or enhanced.	are identified as follows:		relevant wider landscape-level considerations with villages and forest reserved. Based on the HCV assessment report, there is only HCV 4 declare in SOU Derawan. The total area of HCV area for SOU Derawan is 333.70ha HCV area.
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	YES	
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 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	
	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 reqs. 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	YES	The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan made available in all estates. There is an update of HCV Plan collaboration with UPM, Forest Department Sarawak, Sarawak Forest corporation and Nestle detailing plan for Planting the tree, Conservation of Forest, Peat rehab, and Crocodile conservation and it was reviewed with participation of stakeholders, in Sept 2022. The visited estates have maintained its HCV4 which is the Stream, Mill Water Catchment, (Derawan Estate), River Reserve (Sg Samudera), Stream (Sahua Estate), River Reserve (Sg Takau) Mill Water Catchment (Takau Estate, Stream (Sg Samudera) River Reserve (Sg Similajau), Water Catchment area, Isolated Remnant forest, Waterfall (Damai Estate)

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Clause	Indicators	Comply Yes/No	Findings
	directly managed area and any relevant wider landscape level considerations (where these are identified).		
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	YES	Based on HCV report titled 'HCV Assessment for Sarawak Zone. and interviews with stakeholders nearby, it can be concluded that there were no rights of local communities have been identified in HCV areas.
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	YES	Although there was no RTE species found in the CU, Sime Darby SOU Derawan still established their own disciplinary measures if any of their staff or workers found to capture, harm, collect or kill the RTE species. If found any activities to capture, harm, collect or kill RTE species, the estates will make a report to the Sarawak Wildlife Department immediately.
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and	YES	An action plan for FY 2022 was made available at the Takau, Derawan, Sahua and Damai. The outcomes of monitoring were included in the HCV report. An action plan for FY 2022 was made available at the Takau, Derawan, Sahua and Damai Estate. Noted the CU had continued to implement planned actions such as awareness to the staffs and public on

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Clause	Indicators	Comply Yes/No	Findings
	RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.		enhancing biodiversity, posting of relevant information in the Sime Darby webpage and erection of signage at strategically locations
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) Applies.	YES	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Derawan CU since Nov 2005. Remediation and Compensation Procedure (RaCP) did not apply.

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

Clause	Indicators	Comply Yes/No	Findings
<p>5.5.2 Time-bound plan</p> <p>A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.</p>	<p>(a) As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.</p>	YES	<p>SDPB is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.</p> <p><u>Indonesia</u> PT Bahari Gembira Ria Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P9000001OioYJEAZ PT Sandika Natapalma & PT Budidaya Agro Lestari Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing. As at June 2017, the smallholders with the total of 29,914 Ha (58% from the total Ha, 51,715 Ha) of associated smallholders in Indonesia has been</p>

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				<p>certified. Certification process for the remaining associated smallholder's areas was on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and out growers by end 2020.</p> <p>PT Bersama Sejahtera Sakti</p> <p>The new project at KKPA Maju Bersama by the plasma community is currently in nursery stage and not yet due for harvesting, the year of planting was in 2014.</p> <p>PT Ladang Rumpun Subu Rubadi</p> <p>SAP 1 Estate PLASMA will be undergone 2nd stage audit on 2019.</p> <p>PT Guthrie Pecconina PT Bina Sains Cemerlang, PT Sime Indo Agro</p> <p>Land legalization still in progress.</p> <p>PT Bina Sains Cemerlang, PT Sime Indo Agro</p> <p>Issue in getting Surat Perijinan, still in progress.</p> <p>Papua New Guinea (NBPOL)</p> <p>Markham Farming Company Limited (MFCL) / Markham Agro Pte. Ltd.</p> <p>Estimate to be certified on year 2020.</p> <p>The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore, the Remediation and Compensation Procedure will be required to be full filled in order to achieve certification. The Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEIA and LUCA are being undertaken in order to submit and mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration.https://rspo.org/certification/remediation-and-compensation/racp-tracker no 82</p>
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	YES	<p>It can be confirmed that there were several changes to the current time bound plan as verified during this audit.</p> <p>PT Mitra Austral Sejahtera has been sold to PT Inti Nusa Sejahtera. Refer letter dated 27/6/2019 to RSPO Secretariat and announcement at Bursa Malaysia. http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965.</p>
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB	YES	<p>As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI).</p> <p>http://www.simedarbyplantation.com/media/press-releases/sime-darbyplantation-completes-divestment-of-its-liberia-operations</p>

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		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);		
	(d)	Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.	YES	
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. Any new plantings since 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	YES	Based on internal and external audit (ISPO certified) there was no replacement of primary forest or HCV areas in the uncertified management unit. Except for NBPOL area which have potential liabilities of RSPO grower members and the stages of the Remediation and Compensation Procedures (RaCP) that the management units (MUs) are currently undergoing. https://rspo.org/certification/remediation-and-compensation/racp-tracker no 82
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;	YES	Regular discussion was ongoing between Sime Darby Plantation and the group of community (PAC) through bi-monthly Tim Kerja Perwakilan Petani (TKPP) meeting since November 2012. In October 2013, representatives from two of nine villages (Kerunang and Entapang) left TKPP. These two villagers are supported by and working with TuK and OXFAM. They have then requested SDP to enter into Dispute Settlement Facility (DSF) in June 2014. Hence, there were two groups of communities: The TKPP (7 of 9 villages) and the Kerunang & Entapang team (2 of 9 villages). 21 TKPP meetings have been conducted. The most recent one was held on 2/11/2016. Issues related to the 14 demands made by TKPP were closed except for two. As per current status (23/01/2019) SDP and affected parties will be resolved all the issues to proceed with legal review. https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail However, sighted as at June 2019 PT Mitra Austral Sejahtera has been sold to PT Inti Nusa Sejahtera Refer letter dated 27 June 2019 to RSPO Secretariat and announcement at Bursa Malaysia

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				http://www.bursamalaysia.com/market/listed-companies/company-announcements/6202965
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	YES	Based on the internal audit report, there were no labour dispute that were not being resolved yet through an agreed process for all uncertified units for all 7 uncertified units of Sime Darby Plantation Sdn Bhd - Indonesia as at June 2019.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	Based on internal and external audit (ISPO certified) there was no legal non-compliance recorded at the CU.
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self- declarations only by the company,	YES	<p>For TBP dated March 2021, there was several CUs located in Indonesia and 1 unit in Papua New Guinea (NBPOL) not yet completed. Summarized as below:</p> <p>Land legalization – PT Guthrie Pecconina, PT Bina Sains Cemerlang, PT Sime Indo Agro (INA)</p> <p>Surat perijinan in progress (Jadual Pematuhan) – PT Sandika Natapalma/PT Budidaya Agro Lestari (INA)</p> <p>NPP – Markham Farming & Markham Agro (NBPOL)</p> <p>Sold off – PT Mitral Austral Sejahtera (INA), Sime Darby Plantation Grand Cape Mount (Liberia).</p>
		with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		
		• A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement;	YES	
		• Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.	YES	
		• Desktop study e.g. web check on relevant complaints	YES	
		• If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.	YES	
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as	YES	

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		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.		
	(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	
<p>5.6.6</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>		No additional indicators	YES	As it has been mentioned in 4.4.1 of this checklist, the Land Title for All Estate has been verified, for all estates. The Land Title was under the name of Sime Darby Plantation Bhd. Each estate had legal use of the land through Lands and Surveys Department following the payment of premium and Land fee. Based on this, it has been confirmed that there was no such case concerning the rights of local communities or indigenous people in the SOU.

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ATTACHMENT 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
3.3.3 DA 01 2022	Minor	<p>Requirement: Records of monitoring and any actions taken are maintained and available.</p> <p>Finding: Records of monitoring and any actions taken was not maintained and available:</p> <ol style="list-style-type: none"> 1) DOE License 003014 for Derawan POM – Environmental Quality (Amendment) Act 2012 (Regulation 49A) 2) SOM – Environmental Aspect/Impacts Evaluation Procedure dated 25/05/2015 3) Audiometric Test Programme Report # GGOSH/PUA-KKSD/2021/01 dated 20/09/2021 4) Human Right Charter para 3.2 for Freedom of Association. 5) Housing inspection dated 5/9/2022 at Derawan POM workers quarters Block B <p>Objective evidence:</p> <ol style="list-style-type: none"> 1) Previous competent person Certified Environmental Professional in Scheduled Waste Management (CePSWaM) was transferred to another premise in March 2022. As at audit time, there is no record and evidence of appointment competent person were employed to handle the scheduled wastes at Derawan POM. 2) Mechanise Terrace Fertilizer Application (MTFA) and Hasrul 	<p>The root cause:</p> <ol style="list-style-type: none"> 1. The nomination for competent person Certified Environmental Professional in Scheduled Waste Management (CePSWaM) in Derawan POM has been identified but yet to attend the training scheduled in November 2022. 2. The environmental aspect impact for Mechanise Terrace Fertilizer Application (MTFA) and Hasrul Fertilizer Lift (HFL) as a new operation at Sahu Estate are still in draft stage and pending final review from the management 3. Annual audiometric test was done late because pending confirmation of quotation from the vendor. 4. Lack of PMU employee understanding on the grievance channels provided by the company. 5. Lack of training conducted to the person in charge of 	<p>Corrective action Plan Accepted. The Corrective Action will further verify During next Assessment</p> <p style="text-align: center;">OPEN</p>

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		<p>Fertilizer Lift (HFL) as a new operation at Sahu Estate yet to be record and assessed in the identification of environmental aspect impact.</p> <p>3) Based on report, the annual audiometric test shall be conducted on 20/09/2022 for 64 workers. During the audit time at POM, There is no records of evidence that the mill management has conducted the audiometric test for 64 workers as per Occupational Health Doctor (OHD) recommendation.</p> <p>4) No record for grievances from PMU employees of Derawan POM was available.</p> <p>5) There is a records housing checklist at Derawan POM, However the records are inaccurate as evidence During site visit at Derawan POM, it was found that 1 house (B7) has some broken i.e roofing and mosquito net not attended. Monsoon drain also was found broken, reported in the housing inspection</p>	<p>accommodation</p> <p>Correction:</p> <ol style="list-style-type: none"> 1. To follow up with EiMAS on the confirmation course scheduled in November 2022. 2. Management to conduct final review from for the environmental aspect impact for Mechanise Terrace Fertilizer Application (MTFA) and Hasrul Fertilizer Lift (HFL). 3. Management sent 64 workers to annual audiometric test on 7/10/2022. 4. To train and evaluate PMU employee for grievance channels training. 5. To conduct refresher training and evaluation for person in charge of accommodation to ensure the linesite inspection is effectively done. 	
7.8.2 DA 02 2022	Major	<p>Requirement: 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)</p> <p>Finding:</p>	<p>Root cause:</p> <ol style="list-style-type: none"> 1. Lack of supervision by the management on spraying activities near the water edge at the artificial drainage and waterways that directly channel to riparian reserve. 2. Faded demarcation of buffer zone at certain area was not 	<p>Records of training, photos and attendance list, conducted on 11/10/2022 and circle spraying on 17/11/2022 had been received. The training on 11/10/2022 was attended by 7 staff, 1 mandor and 5 sprayers while the training on 17/11/2022 was attended by 1 Assistant Manager, 1 Staff, 1 mandore and 5 workers.</p> <p>Power point presentation of Buffer Zone signages</p>

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		<p>Water courses and wetlands was not protected, including not 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).</p> <p>Objective evidence: During site inspection at Derawan Estate (Field P14A/P14D), Sahu Estate (Field P18C), sighted chemical spraying activities was carried out close to the water edge at the artificial drainage and waterways that directly channel to riparian reserve (Sg. Takau/Sg. Similajau). This practice was not in line with RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p>	<p>repainted.</p> <p>3. Lack of on-site chemical spraying training conducted to the sprayers gang.</p> <p>Corrective action:</p> <ol style="list-style-type: none"> 1. Management to monitor and supervise the spraying activities especially near the water edge at the artificial drainage and waterways that directly channel to riparian reserve. 2. To conduct on-site chemical spraying training and evaluation to the sprayers gang more frequently in smaller groups. 3. To monitor the effectiveness of buffer zone signage and demarcation. 	<p>installed and markings on palm trees had been provided.</p> <p style="text-align: center;">Closed</p>
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ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

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

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			license time. Half year review of certification period will be done by Regional Person In charge in ensuring the mill do not reach the production limit.	
MAR 01 2021 3.3.2	Minor	<p>Requirement :A mechanism to check consistent implementation of procedures is in place.</p> <p>Finding : A mechanism to check consistent implementation of procedures i.e</p> <ul style="list-style-type: none"> - Monitoring on pregnancy female employees at Derawan and Takau Estate. - Monitoring on employee attendance especially female employees who is give childbirth <p>Objective evidence :</p> <ul style="list-style-type: none"> - Interview held with Medical Assistant and verification of records at Takau Estate clinic, no evidence of records on female employees who is currently pregnancy. - Based on checkroll records and daily input on 2 female employees, who is just give childbirth on Sep 2021 and Dec 2021, daily outturn (on Sep, Oct and Nov) was key in as working, but in actual facts they were not working due to maternity leave. 	<p>Root cause:</p> <ol style="list-style-type: none"> 1) wrong interpretation from Female employees at Derawan and Takau Estate which is they think they do not have to check up if they are pregnant, and also mistakes by Assistant until staff because of not verify and identify their own workers. 2) This issue is due to wrongdoing by Staff and not detected earlier by the Assistant Manager due to Staff and Mandore hiding their agenda. <p>Corrective Action:</p> <ol style="list-style-type: none"> 1) To initiate Domestic Inquiry to related personnel 2) To escalate matter to Group HR 3) To increase frequency of detailed verification by Executives to inputs established by staff 4) To provide clear communication and guidelines for maternity benefits for foreign female employees. Female workers on maternity leave shall be coded as M2 in the system. 5) Establishment of Children Welfare Committee at regional level to monitor monthly updates on pregnant female workers. The committee will ensure that all necessary requirements are in place. 6) Refresher training to MAs and on-site verification to clinics' documentation to ensure maternal and child immunization are recorded. 	<p>The management has put the effort to monitor on the pregnancy female employees and attendance especially female employees who given childbirth. Verified the records at Derawan and Takau Estate, recorded 2 and 3 gave childbirth respectively with completed on maternity leave and payment during maternity leave.</p> <p>CLOSED</p>
DA 01 2021 2.2.2	Minor	Requirement: All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal	<p>Root cause:</p> <p>The verification of legal compliance by the</p>	Letter dated 27/12/2021 and records of training for KSG Enterprise had

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		<p>requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>Finding: FFB Transportation contractor did not meet the applicable legal requirements and cannot be demonstrated by the third party.</p> <p>Objective evidence: KSG Enterprise Sdn. Bhd. (FFB Transportation) did not comply with Labour Ordinance Sarawak Act A1237 (Amended as at 10/02/2005), Section 105D, 105E. During interview with contractor workers (FFB Lorry Driver), there was no evidences for the workers have been paid as per regulation i.e. Annual Leave Entitlement Pay and Paid Sick Leave. In the meantime, based on verification of pay slips (Sep. 2021 to Nov. 2021), sighted the payment of wages was paid after 7th of the following month which not complied with for Section 109.</p>	<p>contractors have been done but yet to cover compliance on SLO due to COVID 19. No checklist/guideline has been developed to check on the legality of salary payment to contractors' workers.</p> <p>.</p> <p>Corrective Action: 1) To inform contractors on the requirement to pay salary to their workers as per the SLO and ensure payment made accordingly starting January 2021. 2) To conduct monthly KPI monitoring to contractors as per the C&V SOP. 3) To develop checklist for KPI monitoring.</p>	<p>been conducted on 27/12/2022 were verified by auditors. Payments records for the months of June, July and August 2022 were verified and found to be in compliance with SLO.</p> <p>CLOSED</p>
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ATTACHMENT 6 – Timebound Plan

Time Bound Plan of Sime Darby Plantation Berhad

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

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

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

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

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

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

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

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

NO	Management Unit	Location	Date of Certification	Remarks
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Guadalcanal Province, Solomon Islands	18-Mar-11	

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2	Milne Bay Estates (MBE)	Milne Bay Province, Papua New Guinea	15-Feb-18	
3	Poliamba (POL)	New Ireland Province, Papua New Guinea	19-Mar-12	
4	Ramu Agricultural Industries Ltd (RAIL)	Morobe Province, Papua New Guinea	5-Aug-10	
5	Higaturu Oil Palm (HOP)	Oro Bay Province, Papua New Guinea	1-Feb-13	
6	West New Britain (WNB)	Kimbe, West New Britain, Papua New Guinea	10-Sep-08	
7	Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Markham Farms	27 March 2020.	There is total area for NPP: 710.30 ha which is currently excluded from the certification scope until the NPP is approved.

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

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