

SIRIM QAS INTERNATIONAL SDN. BHD.

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

RSPO PUBLIC SUMMARY REPORT

File Ref.: ES10170028

CLIENT : SIME DARBY PLANTATION BERHAD – SOU 31 LAVANG

PARENT COMPANY: SIME DARBY PLANTATION BERHAD

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

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

Certification	Mill and Supply	GPS	Location	Location
Unit	Base	Latitude	Longitude	Location
	Lavang POM	N 3º 25' 58.6"	E 113º 36' 0.3"	
	Lavang and	N 3º 13' 13"	E 113º 21' 11"	
	Lavang Special	N 3º 33' 16"	E 113º 37' 15"	
SOU 31	Belian	N 3º 31' 37"	E 113º 38' 31"	
	Rasan	N 3º 15' 34"	E 113º 21' 37"	97008 Bintulu, Sarawak
Lavang Certification	Kelida	N 3º 32' 19"	E 113º 40' 51"	
Unit	Pekaka	N 3º 36' 03"	E 113º 38' 41"	
	Ruai	N 3º 26' 45"	E 113º 39' 03"	
	Paroh	N 3º 35' 23	E 113º 42' 25"	
	Dulang	N 3º 35' 23"	E 113º 43' 11"	97011 Bintulu, Sarawak
	Chartquest	N 3º 37' 24"	E 113º 37' 11"	97010 Bintulu, Sarawak

MAP: See Attachment 1 AUDIT DATE : 3-7 October 2022 DURATION : 22 auditor days **TYPE OF AUDIT: Annual Surveillance Audit No. 1 Recertification Audit** STANDARD: MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018 SCOPE OF CERTIFICATION: Production of Sustainable Crude Palm Oil and Palm Kernel Using Identity Preserved (IP) Supply Chain Model VALIDITY OF RSPO CERTIFICATE: 30/12/2021 - 29/12/2026 The following attachments form part of this report: Non-conformity List of additional site(s) Report(s) Acknowledgement by Client's Representative Report by Audit Team Leader Amirul Akmal Daud Name Rohazimi Mat Nawi Name Signature Signature Date 3/1/2023 Date 16/1/2023

SUMMARY OF AUDITS

Annual Surveillance Audit 1						
On-site audit date	:	3-7 October 2022 No. of auc		No. of auditor days:	22.0 auditor day	
Audit team	:	TLA:Roh	TLA:Rohazimi Mat Nawi			
					aimee Ab Rahman, Mo	hd Nordin Abd Jalil,
		Selvasing	gam T. Ka	ndiah and Mohd Ab	Raouf Asis	
No. of major NCR	:	2	Indicator	: 7.10.1,7.8.2		Closing date :
						27/12/2022
No. of minor NCR	:	1	Indicator	1	T	
Indicate by ticking the stakeholders	:	Employe	es	Settlers	Villagers / Local communities	Suppliers
interviewed during the		1	V		V	V
on-site audit		Contract	workers	NGOs	Govt. agency	Independent growers
		٦	$\sqrt{}$			
		Indige	enous	Contractor	Others (Please specify)
		pec	ple			
		N	Α			
Supply base sampled	:	Kelida Estate, Lavang Estate, Chartquest Estate, Dulang Estate.			ate.	
Changes since the last audit	:	No changes				
Justification of audit planning	:	The total allocation of auditor days for SOU Lavang Pekaka were: 22.0 auditor days Mill = 5 days (covering for safety and health, environment, mill best practices, GHG verification, social and supply chain certification systems).				
		There were four (4) estates audited namely Kelida Estate, Lavang Estate, Chartquest Estate, Dulang Estate. A total 17-days were 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.				
		The total for the entire CU is therefore 22 man-day which justified the no of auditors			stified the no of auditors and	
				s for this audit.		
Report approved by	:	Kamini S	ooriamoor	thy	Approval date: 9/	1/2023

Annual Surveillance Audit 4 / Recertification Audit						
On-site audit date	:	6-10 December 2021			No. of auditor days:	35 days
Audit team	:	Rozaimee Ab Rahman, Dzulfiqar Azmi,			i, Rohazimi Mat Nawi, A	Amir B Bahari , Mohd
		Zulfakar k	Kamaruza	man , Selvasingam	T. Kandiah and Mohd	Ab Raouf Asis
No. of major NCR	:	3	Indicator	: 3.8.7, 7.3.2, 7.7.6	3	Closing date :23/02/2022
No. of minor NCR	:	3	Indicator	: 3.3.2, 3.4.2, 6.7.3	3	
Indicate by ticking the stakeholders	:	Employee	es	Settlers	Villagers / Local communities	Suppliers
interviewed during the		Х	(Х	X
on-site audit		Contract	workers	NGOs	Govt. agency	Independent growers
					Х	
		Indige peo		Contractor	Others (Please specify)
				Х		
Supply base sampled	:	Rasan Es	state, Belia	an Estate, Paroh E	state, Pekaka Estate, I	Lavang Estate, Ruai Estate,
·		Charques	t Estate			-
Changes since the last audit	:	1-Supply Chain Model changed to IP, since 1/12/2021. Refer to verification report dated 6/12/2021.			r to verification report dated	
		2-Lavang	Special E	state merged with	Lavang Estate	
Justification of audit planning	:	The total allocation of auditor days for SOU Lavang Pekaka were: 35.0 auditor days Mill = 5 days (4 day for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems). There were seven (7) estates audited namely, Rasan Estate, Belian Estate, Paroh Estate, Pekaka Estate, Lavang Estate, Ruai Estate, Charquest Estate A 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 (1.0) plus the verification of Land History and Land Title (1.0).				
Name of peer reviewer	:	Prof. Dzolkhifli bin Omar				
Report approved by	:	Kamini So	ooriamoor	thy	Approval date: 30)/03/2022

SUMMARY OF INFORMATION

TABLE 1

	RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	December 2021- November 2022	October 2022- September 2023			
Certified FFB Processed (MT)	264,074.13	255,977.21			
Production of Certified CPO (MT)	60,948.31	57,466.88			
Production of Certified PK (MT)	15,131.45	13,464.40			
Certified Areas (Ha)	24,836.54	24,836.54			
Planted Areas (Ha)	20,357.51	20,425.12			
Production Areas (Ha)	14,816.21	14,546.16			
HCV Areas / Conservation Areas (Ha)	354.07ha	354.07 ha			
REMARKS	Changes at Dulan on Dec 21	g Estate – planted h	ectarage vary due	to resurvey by PAU	R&D conducted

TABLE 2

	РО	PK
**Last years certified volume (MT)	60,948.31	15,131.45
Last years actual certified sold (MT)	25,747.40	6,969.14
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	0.00	0.00
Last year actual sold CSPO credits (where applicable)	0.00	0.00
New year certified volume (MT)	57,466.88	13,464.40

^{**}With reference to the extension of volume applied and approved by RSPO
*Please stated palm trace extension approval date and quantity.

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1.0 AUDIT PROCESS

1.1 Certification Body

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

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Rohazimi Mat Nawi	Lead Auditor Environment, metric template and GHG	Hold B. Sc (Hons) Chemical_Gas Engineering from Universiti Teknologi Malaysia. He has been in the Plantations Industry with various company having served in Palm Oil Mill. He was qualified in the auditing line with experienced in Sustainability, QMS, EMS, OHSMS and Supply Chain audit.
Mohd Nordin Abd Jalil	Auditor GAP	Holds a B. Sc. in Agriculture from Universiti Pertanian Malaysia. He has over 35 years working experience in the oil palm plantation operation. He is qualified auditor for RSPO P&C.
Rozaimee Ab. Rahman	Auditor SC, Safety and TBP	Holds a B. Sc. of Agriculture. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO.
Selvasingam T Kandiah	Auditor Safety, GAP	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 / Social, HCV	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C and RSPO Supply Chain.
Mohd Ab Raouf Bin Asis	Auditor Social and GAP	Holds a B. Sc. UHTM in Manufacturing (Production and Operation). He had more than 7 years of working experience in the oil palm operation. He has experience in auditing since 2016. He was successfully attended Quality Management System (ISO 9001:2015) and OHS 18001:2007 lead assessor course in 2016.

1.3 Audit methodology

The scope of the audit was based on a sampling of the supply bases. In total there were 9 (nine) estates i.e., Lavang Estate, Belian Estate, Rasan Estate, Kelida Estate, Pekaka Estate, Ruai Estate, Paroh Estate, Dulang Estate and Chartquest Estate. Audit team used the 0.8√y from sampling-based formula to determine the management units sampling to be focused on and also considered the issues raised by stakeholder. Based on this formula, the team of auditors determined that the sampling locations are Lavang Palm Oil Mill and 4 estates i.e., Kelida Estate, Lavang Estate, Dulang Estate and Charquest Estate.

1.4 Stakeholder Consultation

In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below:

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (local / foreign / Orang Asli workers / male & female)	The following were confirmed during the conduct of audit as there was no evidence to prove otherwise: a. 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. b. They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime. c. They have been getting salaries above RM1,500 since May 2022. Salaries were paid before the 7th of every month. d. No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment. e. No discrimination between migrant workers and local workers, between male and female workers. f. Comfortable housing with water and electricity provided. g. Have access to affordable food from the canteen/sundry shops within the estate/mill premises. h. Entitled to free medical facilities at the estate clinic. i. 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. j. They knew the types of work offered at Lavang Pekaka SOU 31 (mill & estates) when they were in their countries of origin. k. All migrant workers keep their own passports. l. Shuttle services FOC once a month for workers go to nearest town. m. Reactivation / Registration Maybank account for all workers, no more cash salary payment by Jan 2022. n. Monthly recognition for workers i.e. highest harvesting productivity and housing cleanness o. Alternate Sunday/Rest Work p. Complaint channel via various platform i.e. Suara Kami (Platform by Nestle), Impactt (Ulula), WMU Careline (From Region), Whistleblowing (HQ). q. Freedom Decision Movement by worker for medical access and

2) Settlers	Not applicable.
Villagers / Local communities (including women representatives, displaced communities)	Tuai Rh Edward, Tuai Rh Robert and Tuai Rh Sating – no issues CU has a good relationship with the villagers.
4) Suppliers	No issue raised. Payments are received in time.
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	No complaints received.
8) Independent growers / Smallholders	No smallholder supply FFB to the CU
9) Indigenous people	NA
10) Contractor	The contractors confirmed the fairness of the terms of their contract, and payments are usually received in time.
11) Previous land owner (if any)	NA
12) Others (please specify)	Provision shop available at the estates visited. No issues raised on the pricing and services.

1.5 Audit plan: Refer to Attachment 2

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

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Lavang Pekaka 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 31. The CU consisted of one palm oil mill, the Lavang Palm Oil Mill (LPOM) and 9-supply bases, namely, Lavang Estate (Lavang Special Estate merged), Belian Estate, Rasan Estate, Kelida Estate, Pekaka Estate, Ruai Estate, Paroh Estate, Dulang Estate and Chartquest Estate. All Estates belong to SDPB. LPOM commenced operations in 1993 with a processing capacity of 90 metric tonnes of (FFB) per hour. Lavang POM obtained certified FFB from own certified supply base and as well as external supplier i.e., Subis Plantation (non-certified). However, the Supply Chain Model changed and approved from MB to IP-certified, since 1/12/2021. The total combined land area of all estates is 24,836.54 hectares (Ha) of which 20,425.12 Ha planted with oil palm. All the estates have been fully developed before 2005.

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.

<u>Table 1(a): Actual FFB production by the supply base for the last reporting period</u> (December 2021-September 2022)

	FFB P	roduction		
Estates	Tonnes	Percentage (%)	Certifying CB	
·	S0U 31	- LAVANG	•	
BELIAN	11,090.05	8.12	SIRIM	
KELIDA	19,228.21	14.08	SIRIM	
LAVANG	15,712.91	11.51	SIRIM	
RASAN	16,600.53	12.16	SIRIM	
·	SOU 34	– PEKAKA	•	
CHARTQUEST	7,599.89	5.57	SIRIM	
DULANG	16,305.08	11.94	SIRIM	
PAROH	15,810.89	11.58	SIRIM	
PEKAKA	19,262.16	14.11	SIRIM	
RUAI	14,541.87	10.65	SIRIM	
SOU 33 - DERAWAN				
TAKAU	374.47	0.27	SIRIM	
DERAWAN	12.68	0.01	SIRIM	
Total	136,538.74	100		

<u>Table 2: Projected FFB production by supply base for the next reporting period</u>
(October 2022 to September 2023)

	FFB Contribution		
Estates	Tonnes	Percentage (%)	
SOU 31 - LAVANG			
RASAN	30,001.49	11.72	
KELIDA	26,631.46	10.40	
LAVANG	35,541.13	13.88	
BELIAN	31,371.21	12.26	
SOU 34 - PEKAKA			
PEKAKA	41,497.39	16.21	
RUAI	29,098.75	11.37	
DULANG	26,155.63	10.22	
PAROH	21,023.19	8.21	
CHARTQUEST	14,656.96	5.73	
Grand Total	255,977.21	100%	

Table 3: Actual FFB received and CPO & PK dispatch by Lavang POM for period from December 2021 – September 2022

RSPO Supply Chain Model : IP	Total (MT)
FFB Received	136,545.08
FFB Processed	136,538.74
Certified FFB Processed	136,538.74
Non-certified FFB Processed	0
Crude Palm Oil (CPC	0)
Overall CPO Production	29,621.54
Certified CPO Production	29,621.54
Certified CPO delivered as RSPO	25,747.40
Certified CPO delivered as non-RSPO	0
Certified CPO delivered under other sustainable schemes	0
Palm Kernel (PK)	
Overall PK Production	7,086.35
Certified PK Production	7,086.35
Certified PK delivered as RSPO	6,969.14
Certified PK delivered as non-RSPO	0
Certified PK delivered under other sustainable schemes	0
Credit traded under Book & Claim	0

<u>Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period</u>
(October 2022 – September 2023)

RSPO Supply Chain Model : Identity Preserved	Total (MT)
FFB Received	255,977.21
FFB Processed	255,977.21
Certified CPO Production	57,466.88
Certified PK Production	13,464.40

Remark: Low of FFB production regarding shortage of labour, shortage of tall palm skill harvester and abandoned area due to shortage of workers.

Table 5: Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Lavang + Lavang Special	2583.47	4363.83
Rasan	2947.65	3454.00
Kelida	1925.04	2460.00
Pekaka	2614.00	2626.14
Belian	2360.13	2847.00
Dulang	2278.40 (2346.01 - NEW)	2548.00
Chartquest	1312.00	1448.71
Paroh	2043.20	2627.90
Ruai	2293.62	2460.96
Total	20425.12	24836.54

Table 6: Planting profile for Lavang + Lavang Special Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1997	1st	mature	614.53	23.79
2011	2 nd	mature	152.43	5.90
2013	2 nd	mature	67.58	2.62
2015	2 nd	mature	93.64	3.62
2016	2 nd	mature	333.98	12.93
2017	2 nd	mature	202.19	7.83
2018	2 nd	mature	212.51	8.23
2019	2 nd	immature	750.57	29.05
2021	2 nd	immature	156.04	6.04
Total			2583.47	100%

Table 7: Planting profile for Rasan Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1997	1 st	Mature	1265.59 Ha	42.94
1998	1 st	Mature	342.58 Ha	11.62
2016	2 nd	Mature	352.39 Ha	11.95
2017	2 nd	Mature	271.76 Ha	9.22
2018	2 nd	Immature	192.63 Ha	6.54
2020	2 nd	Immature	205.11 Ha	6.96
2021	2nd	Immature	317.59 Ha	10.77
Total			2947.65	100%

Table 8: Planting profile for Pekaka Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1992	1 st Generation	Mature	92.82	3.55
1993	1 st Generation	Mature	62.49	2.39
2012	2 nd Generation	Mature	480.24	18.37
2014	2 nd Generation	Mature	246.60	9.43
2015	2 nd Generation	Mature	513.46	19.64
2016	2 nd Generation	Mature	352.27	13.48
2017	2 nd Generation	Mature	255.03	9.76
2018	2 nd Generation	Mature	273.35	10.46
2020	2 nd Generation	Immature	240.12	9.19
2021	2 nd Generation	Immature	97.62	3.73
Total			2614.00	100%

Table 9: Planting profile for Kelida Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1998	1 st	Mature	174.22	9.05
2009	2 nd	Mature	104.66	5.44
2010	2 nd	Mature	193.97	10.08
2011	2 nd	Mature	208.84	10.85
2012	2 nd	Mature	176.19	9.15
2013	2 nd	Mature	80.53	4.18
2014	2 nd	Mature	250.67	13.02
2015	2 nd	Mature	108.93	5.66
2017	2 nd	Mature	202.60	10.52
2018	2 nd	Immature	61.74	3.21
2019	2 nd	Immature	53.46	2.78
2020	2 nd	Immature	309.23	16.06
Total	Total			100%

Table 10: Planting profile for Belian Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2004	1 st	Mature	44.37	1.88
2012	2 nd	Mature	213.53	9.05
2013	2 nd	Mature	201.40	8.53
2014	2 nd	Mature	192.01	8.14
2015	3 rd	Mature	184.37	7.81
2016	2 nd	Mature	295.61	12.53

2018	2 nd	Mature	126.16	5.35
2019	2 nd	Immature	655.91	27.79
2020	2 nd	Immature	271.89	11.52
2021	2 nd	Immature	174.88	7.41
Total			2360.13	100%

Table 11: Planting profile for Dulang Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2021	2 nd	Immature	263.61	8.60
2020	2 nd	Immature	203	8.91
2019	2 nd	Immature	160	7.02
2018	2 nd	Mature	279	12.25
2017	2 nd	Mature	155	6.80
2015	2 nd	Mature	154.12	6.76
2014	2 nd	Mature	190	8.34
2013	2 nd	Mature	99	4.35
2012	2 nd	Mature	132	5.79
1992	1 st	Mature	119.01	5.22
1993	1 st	Mature	320.63	14.07
1994	1 st	Mature	104	4.56
1995	1st	Mature	166.64	7.31
Total			2346.01	100%

Table 12: Planting profile for Chartquest Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1997	1ST	MATURE	643.63	49.06
2016	2 ND	MATURE	209.43	15.96
2017	2 ND	MATURE	114.85	8.75
2018	2 ND	IMMATURE	91.1	6.94
2020	2 ND	IMMATURE	160.32	12.22
2021	2 ND	IMMATURE	92.67	7.06
Total			1312	100%

Table 13: Planting profile for Paroh Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1994	1 st	Mature	311.77	15.28
1995	1 st	Mature	141.68	6.93
2014	2 nd	Mature	175.33	8.58
2015	2 nd	Mature	160.19	7.84
2016	2 nd	Mature	406.18	19.88
2017	2 nd	Mature	155.14	7.59
2018	2 nd	Mature	62.41	3.05
2019	2 nd	Immature	103.84	5.08
2020	2 nd	Immature	282.8	13.84
2021	2 nd	Immature	243.86	11.93
Total			2043.20	100%

Table 14: Planting profile for Ruai Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1992	1 st	Mature	157.69	6.88

1993	1 st	Mature	156.85	6.84
2012	2 nd	Mature	145.12	6.33
2013	2 nd	Mature	161.11	7.02
2014	2 nd	Mature	276.67	12.06
2017	2 nd	Mature	278.59	12.15
2018	2 nd	Mature	326.67	14.24
2019	2 nd	Immature	82.68	3.60
2020	2 nd	Immature	399.28	17.41
2021	2 nd	Immature	308.96	13.47
Total			2293.62	100%

		<u>.</u>	
2.3	Organizational Inform	ation/Contact Person(s)	
	The details of the contr	not norman are as helevu	
		act person are as below: Zalizan Mohd Tahir	
	Name : Position :	Mill Manager	
	Address :	Lavang Palm Oil Mill, KM72, Jln Bintulu-Miri, 97008, Bintulu,	
	Address .	Sarawak	
	Phone no. :	019-8538388	
	Fax no. :	-	
	Email :	zalizan.mohd.tahir@simedarbyplantation.com	
•	ALIDIT FINIDINGS		
3.0	AUDIT FINDINGS		
3.1	Changes to certified pro	oducts in accordance to the production of the previous year:	
0		to processing activities.	
	to organization arranged	10 p. 10 00 00 11 11 11 11 11 11 11 11 11 11	
2.2	Dragges and shares	in time hound alon (Defeate Attachment C for the time hound alon)	
3.2	Progress and changes	in time bound plan (Refer to Attachment 6 for the time bound plan)	_
i.	Have all the estates un	der the parent company been certified?	No
	If no comments on the	organization's compliance with the RSPO partial certification rules :	
	As provided in RSPO C	ertifications 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 term	s of acceptance or non acceptance on the changes in the time-bound plan?	
iii.		nallholders (including scheme smallholders) in the	No
	CU		
	Maria hava All Haras	Yes	No
		sociated smallholders (including scheme heir fruit supply is included, by the mill, in its	
	certification?	Tion truit supply is infoluted, by the film, in its ———	_
		one NA	
	If no, please state rease	ons IV.	

Any new acquisition which has replaced primary forests or HCV areas

iv.

No

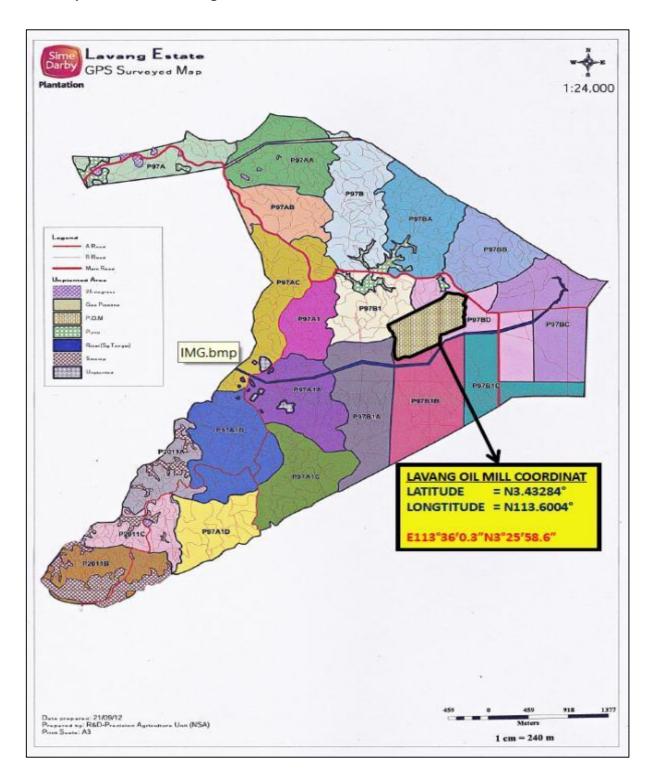
Yes

3.3	Other changes (e.g. organizational structure, new contact person, addresses, etc.)					
	Changes to new Lavang Palm Oil Mill Manager, Mr Zalizan Mohd Tahir effective 15/8/2022.					
3.4	Status of previous non-conformities * * If not closed, minor non conformity will be upgraded to major non conformity Not closed*					
3.5.	Complaint received from stakehold No complaints from stakeholders v		ed.			
4.0	DETAILS OF NON-CONFORMITY	Y REPORT				
4.1	For P&C (Details checklist refer to	Attachment	3) :			
	Total no. of minor NCR(s) (details refer to Attachment 3)	List: 1	RMN 02 2022			
	Total no. of major NCR(s) (details refer to Attachment 3)	List: 2	RMN 01 2022 & MZK 01 2022			
4.2	For SC (Details checklist refer to A	Attachment 5)):			
	Total no. of minor NCR(s) (details refer to Attachment 3)	List : Nil				
	Total no. of major NCR(s) (details refer to Attachment 3)	List :Nil				
5.0		he RSPO P&	ation has / has not* established and maintained its according to the standard and demonstrated the agreed criterion & requirements.			

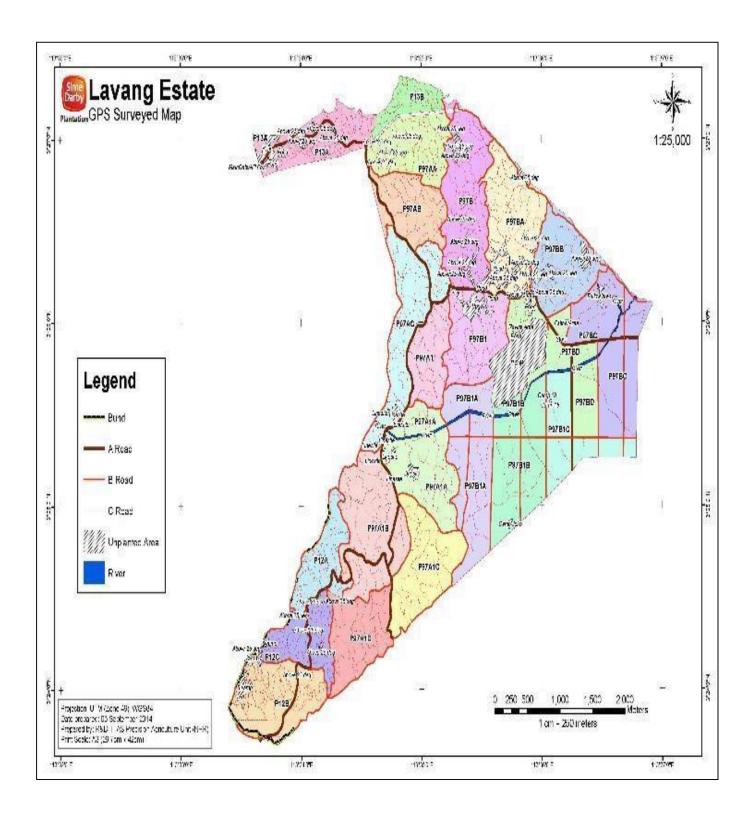
6.0	RECOMM	ENDATIO)N					
		No NCF	R recorded. Recommended to contin	nue certification.				
		Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.						
		Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs.						
			ICR(s) recorded. Evidence of impdiand accepted by the audit team. T					
	-	Recomr	nended to continue certification.					
		provide	NCR(s) recorded. Evidence of impd but not fully accepted by the audit but within 60 days of the audit. Reco	it team. NCR(s) have not l	been satisfactorily			
			Major NCRs which are not addres te being withdrawn.	ssed within a further 60 days s	shall result in the			
7.0	HAVE B ACTION REVIEW	SEEN SAT	D THAT ALL CORRECTIVE ACTION IN THE PROPERTY OF THE PROPERTY O	EPTED AND VERIFIED AND ALL NFORMITIES HAVE BEEN SATI	CORRECTIVE SFACTORILY			
Aud	it Team Lea	ider :	ROHAZIMI MAT NAWI	Catherina	02/01/2023			
			(Name)	(Signature)	(Date)			

Attachment 1

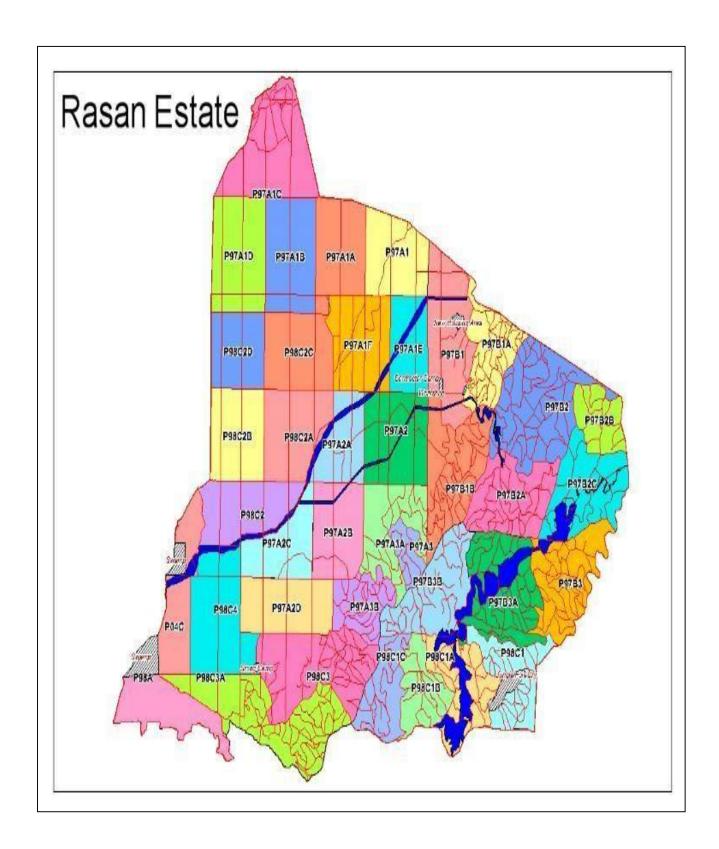
Location Map of SOU 31- Lavang POM



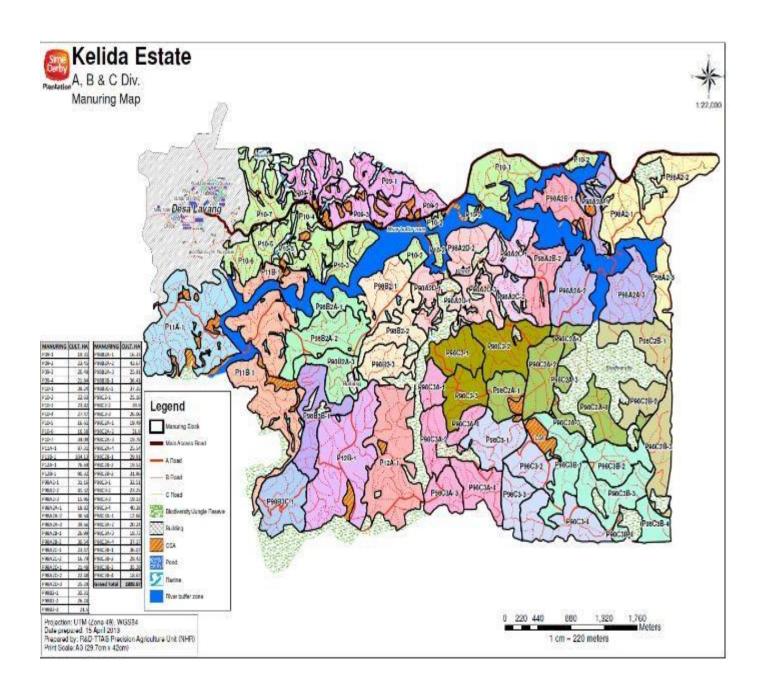
Map of Lavang Estate



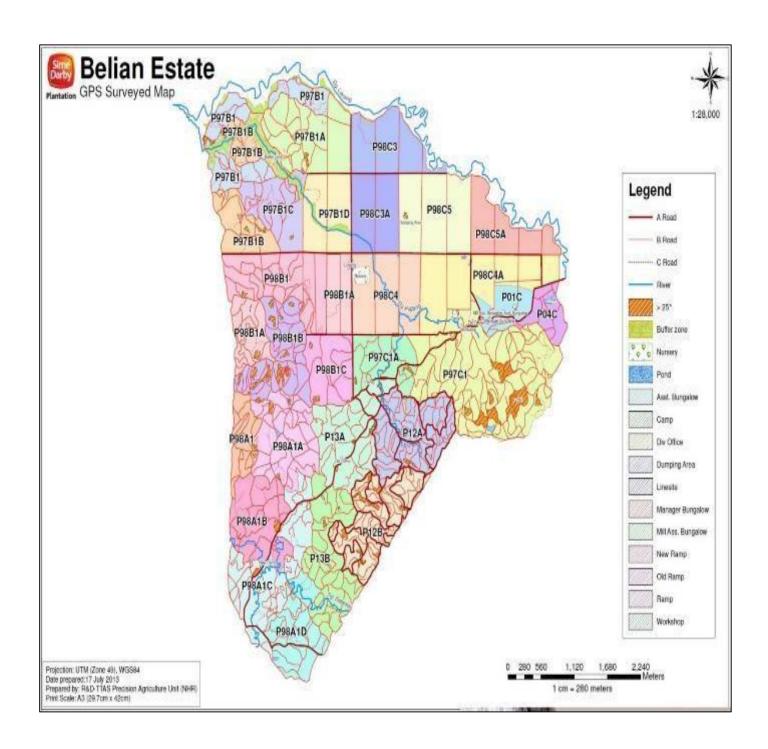
Map of Rasan Estate



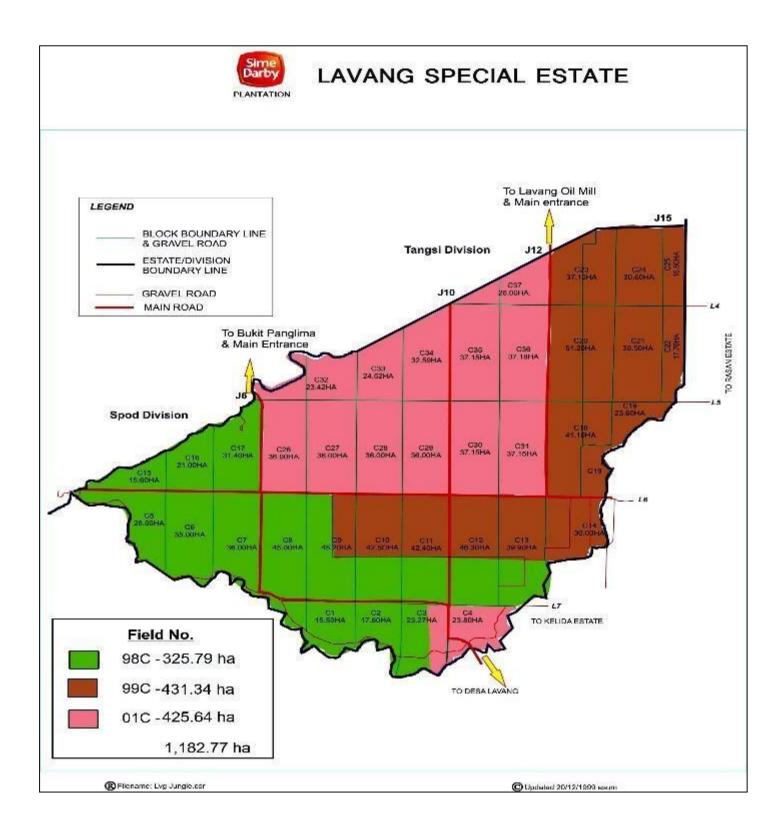
Map Of Kelida Estate



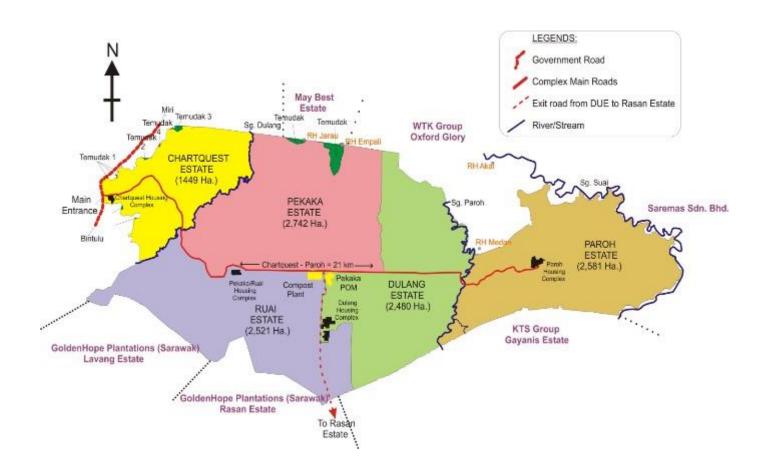
Map of Belian Estate



Map of Lavang Special Estate (merged into Lavang Estate)



Map of Pekaka Estate , Dulang Estate, Chartquest Estate, Paroh, Dulang Estate, Ruai Estate



Attachment 2

RSPO SURVEILLANCE AUDIT PLAN

1. Objectives

The objectives of the audit are as follows:

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

2. Date of assessment : 3rd October 2022 – 7th October 2022

3. Site of assessment : Lavang Palm Oil Mill

Lavang Estate including Lavang Special

Dulang Estate Kelida Estate Chartquest Estate

3a. Scope: Production Of Sustainable Crude Palm Oil And Palm Kernel Using The Identity Preserved (IP) Supply Chain Model

4. Reference Standard:

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

5. Assessment Team

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

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

Rozaimee Ab Rahman(RAR)- (GHG & SC)

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

Selvasinggam T.Kandiah (STK) (Safety, GAP)

Mohd Nordin Abd Jalil (MNAJ) (GAP)

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

7. Audit Method

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

8. Audit Findings

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

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

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

9. Confidentiality Requirements

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

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

10. Working Language : English and Bahasa Malaysia

11. Reporting

a) Language : English

b) Format : Verbal and written

c) Expected date of issue : 2 weeks after the closure of the Major NC / or if

only minor NC, 30 days from the last day of this

audit.

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

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

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

Oct. 2021 to Sept. 2022 or Sept 2021 to Aug 2022

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

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

14. Assessment Programme Details : As below

Day 1: 3 October 2022 (RMN	MAR	RAR	MZK	MNAJ	STK
8.30am – 9.15am	 Opening Meeting – Venue: Will be decide by client Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings. 	/	/	/	/		
9.15am – 12.30pm	Site observation to Dulang Estate P1, P2, P3, P4, P5, P6, P7 Coccupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Interview with workers, contractors etc. Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management	/	/	/	/		
12.30pm – 1.30pm	Lunch Break						
1.30pm – 5.00pm	Continue assessment at respective sites	/	/	/	/		
Date / Time	Coverage of assessment / Activity / Site	RMN	MAR	RAR	MZK	MNAJ	STK
Date / Time Day 2: 4 October 2022 (• • • • • • • • • • • • • • • • • • • •	RMN	MAR	RAR	MZK	MNAJ	STK
Day 2: 4 October 2022 (8.30am – 12.30pm	Site observation to Lavang Estate P1, P2, P3, P4, P5, P6, P7 Verification of basic information estate Confirmation of time bound plan & review of partial certification Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Interview with workers, contractors etc. Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management	/	/	/	MZK	MNAJ	STK
Day 2: 4 October 2022 (Site observation to Lavang Estate P1, P2, P3, P4, P5, P6, P7 Verification of basic information estate Confirmation of time bound plan & review of partial certification Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Interview with workers, contractors etc. Occupational safety & health aspects, chemical management Interview with workers, contractors etc.	/	/		/	MNAJ	STK

Date / Time	Coverage of assessment / Activity / Site	RMN	MAR	RAR	MZK	MNAJ	STK
Day 3: 5 October 2022	(Wednesday)						
8.30am – 12.30pm	Site observation to Dulang Estate					/	
	• P6, P7						
	 Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting 						
	Interview with workers, contractors etc.						
8.30am – 12.30pm	Site observation to Lavang POM						
	RSPO Supply Chain						
	RSPO Supply chain standard implementation including model requirements						
	P1, P2, P3, P4, P5, P6, P7 Occupational safety & health aspects, chemical management						
	Occupational safety & nearth aspects , chemical management Interview with workers, contractors etc.						
	Environmental management, waste & chemical management						
	Land titles user rights	,	,	,	/		1
	Social aspects - SIA, management plan & implementation, workers' quarters,	,	,	,	,		,
	 Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. 						
	 Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, 						
	New planting						
	Occupational safety & health aspects, chemical management						
	Interview with workers, contractors etc.						
	Environmental management, waste & chemical management						
12.30pm – 1.30pm	Lunch Break						
	Continue aggregates at respective sites	,	,	,	,	,	,
1.30pm – 5.00pm	Continue assessment at respective sites	/ DD401	/	/	/ DAZK	/	/ CTV
1.30pm – 5.00pm Date / Time	Coverage of assessment / Activity / Site	/ RMN	/ MAR	/ RAR	/ MZK	/ MNAJ	/ STK
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022	Coverage of assessment / Activity / Site (Thursday)	/ RMN	/ MAR	/ RAR	/ MZK	/ MNAJ	/ STK
1.30pm – 5.00pm Date / Time	Coverage of assessment / Activity / Site	/ RMN	/ MAR	/ RAR	/ MZK	/ MNAJ	/ STK /
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022	Coverage of assessment / Activity / Site (Thursday) Site observation to Lavang Estate	/ RMN	/ MAR	/ RAR	/ MZK	/ MNAJ	/ STK /
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022	Coverage of assessment / Activity / Site (Thursday) Site observation to Lavang Estate P6, P7 Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting	/ RMN	/ MAR	/ RAR	/ MZK	/ MNAJ	/ STK /
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022 8.30am – 12.30pm	Coverage of assessment / Activity / Site (Thursday) Site observation to Lavang Estate	/ RMN	/ MAR	/ RAR	/ MZK	/ MNAJ	/ STK /
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022	Coverage of assessment / Activity / Site (Thursday) Site observation to Lavang Estate	/ RMN	/ MAR	/ RAR	/ MZK	/ MNAJ	/ STK /
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022 8.30am – 12.30pm	Coverage of assessment / Activity / Site (Thursday) Site observation to Lavang Estate	/ RMN	/ MAR	/ RAR	/ MZK	/ MNAJ	/ STK /
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022 8.30am – 12.30pm	Coverage of assessment / Activity / Site (Thursday) Site observation to Lavang Estate	/ RMN	/ MAR	/ RAR	/ MZK	/ MNAJ	/ STK /
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022 8.30am – 12.30pm	Coverage of assessment / Activity / Site (Thursday) Site observation to Lavang Estate	/ RMN	/ MAR	/ RAR	/ MZK	/ MNAJ	/ STK /
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022 8.30am – 12.30pm	Coverage of assessment / Activity / Site (Thursday) Site observation to Lavang Estate	/ RMN	/ MAR	/ RAR	/ MZK	/ MNAJ	/ STK /
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022 8.30am – 12.30pm	Coverage of assessment / Activity / Site (Thursday) Site observation to Lavang Estate P6, P7 Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Interview with workers, contractors etc. Site observation to Kelida Estate P1, P2, P3, P4, P5, P6, P7 Cocupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects - SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate	/ RMN	/ MAR	/ RAR	/ MZK	/ MNAJ	/ STK /
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022 8.30am – 12.30pm	Coverage of assessment / Activity / Site (Thursday) Site observation to Lavang Estate	/ RMN	/ MAR	/ RAR	/ MZK	/ MNAJ	/ STK /
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022 8.30am – 12.30pm	Thursday) Site observation to Lavang Estate P6, P7 Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Interview with workers, contractors etc. Site observation to Kelida Estate P1, P2, P3, P4, P5, P6, P7 Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights	/ RMN	/ MAR	/ RAR		/ MNAJ	/ STK /
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022 8.30am – 12.30pm	Thursday) Site observation to Lavang Estate P6, P7 Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, hew planting Interview with workers, contractors etc. Site observation to Kelida Estate P1, P2, P3, P4, P5, P6, P7 Cocupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM,	/ RMN	/ MAR	/ RAR		/ MNAJ	/ STK /
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022 8.30am – 12.30pm	Thursday) Site observation to Lavang Estate P6, P7 Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Interview with workers, contractors etc. Site observation to Kelida Estate P1, P2, P3, P4, P5, P6, P7 Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM,	/ RMN	/ MAR	/ RAR		/ MNAJ	/ STK /
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022 8.30am – 12.30pm	Coverage of assessment / Activity / Site	/ RMN	/ MAR	/ RAR		/ MNAJ	/ STK /
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022 8.30am – 12.30pm	Coverage of assessment / Activity / Site	/ RMN	/ MAR	/ RAR		/ MNAJ	/ STK /
1.30pm – 5.00pm Date / Time Day 4: 6 October 2022 8.30am – 12.30pm	Coverage of assessment / Activity / Site	/ RMN	/ MAR	/ RAR		/ MNAJ	/ STK /

1.30pm – 5.00pm Continue assessment at respective sites / / / / / /

Date / Time	Coverage of assessment / Activity / Site	RMN	MAR	RAR	MZK	MNAJ	STK
Day 5: 7 October 2022 ((Friday)						
8.30am – 12.30pm	Site observation to Chartquest Estate P1, P2, P3, P4, P5, P6, P7 Cocupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Interview with workers, contractors etc. Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Confirmation of time bound plan & review of partial certification	/	/	/	/	/	,
11.30pm – 1.30pm	Lunch Break and Friday prayer						
1.30pm – 3.30pm	Continue assessment at respective sites	/	/	/	/	/	/
3.30pm – 4.00pm	Verification on outstanding issues Audit team discussion, preparation on audit findings and issuance of nonconformity report (if any)		/	/	/	/	/
4.00pm -5.00pm	 Closing meeting at respective site (decide by client) Presentation of audit findings, positive comment, Question & answer 	/	/	/	/	/	/

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. 1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders. AUDITORS' GUIDE: 1) Appropriate language means apart from Bahasa Malaysia & English, information needs to be made available in languages deem suitable to ensure ALL stakeholders understand the content/information.	Yes	Documented communication procedure at SOU Lavang 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 confidentially 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. 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. SOU Lavang Pekaka had identified personnel responsible for handling of complaints. Records of communication were maintained at respective offices. Communication with the authority such as DOSH, DOE and Labour Department were maintained in the communication file. At the point of this assessment, there has been no request for such information by the public. Among the records inspected were correspondences with the authorities, local communities and employees. However, the handling and retained documented information need to be improved as per highlighted in Minor NCR RMN 02 2022.
	1.1.3 (C) Records of requests for information and responses are maintained.	Yes	Requests for information and responses were maintained accordingly through the inspections book and letters in the mill and supply bases. Sighted the latest external stakeholders' minutes meeting for whole SOU 31 Lavang & SOU 34 Pekaka conducted on Sept 2022. It was attended by both external and internal stakeholders i.e., government agencies, school, villagers and private sectors (contractors and neighboring estates).

Clause	Indicators	Comply Yes/No	Findings
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. AUDITORS' GUIDE: 1) Do the stakeholders include Orang Asli or indigenous people? Refer to AUDITORS' GUIDE IN REPORTING ORANG ASLI MATTERS at the end of this checklist. 2) Make sure relevant consultation and communication are properly documented and available for review during audit. The process description shall be clear for reference. 3) Obtain information on how relevant procedures were circulated to employees and the awareness process i.e. a) Type of contract – daily rate or piece rate. Overtime? b) Mechanism for handling of complaint from internal/external stakeholders. c) Workers understanding and awareness. d) Other workers samples including Orang Asli (if any), contract workers, foreign contract workers.	Yes	The consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative at Lavang CU. The procedures were Doc: SDP Quality Management System (SOM) Section 5 Sub-section 5.5, Appendix 5.5.3.2 for External Communication and Doc: SDP Quality Management System (SOM) Sub-section 5.5, Responsibility, Authority & Communication for Internal Communication. Notices and posters / pamphlets observed displayed on notice boards at the office of the estate and the mills and the muster ground were also used as a means of internal communication. For external communication, this was explained to all stakeholders at the Stakeholders Meetings.
	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 Lavang was maintained by the respective sites. The list of stakeholders comprises of the address, contact number, nominated representatives which included the contractors, vendors/suppliers, foreign recruitment agencies, embassy, government agencies, schools, local communities, CPO/PK customers, etc.
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	SDPB has developed and implemented Code of Business Conduct (August 2020) where the company implemented the integrity, respect & responsibility, enterprise and excellence during any business process. The policy was developed in Bahasa Malaysia, English and Bahasa Indonesia which can be downloaded via http://www.simedarbyplantation.com/corporate/ethical-business-practices . It was noted that the contractors and suppliers have signed on the Vendor Integrity Pledge where Code of Business Conduct has outlined in the pledge. It was also explained during the induction course for the newly arrived workers.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	Yes	Lavang CU have issued a "Vendor Integrity Pledge" that is to be signed by all contractors, suppliers and vendors. The Pledge states that the undersigned has read, understood and will comply to The Vendor Code of Business Conduct (includes Ethics and Management Practices).

Clause	Indicators	Comply Yes/No	Findings
			SDPB 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/whitsleblowing 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. The contractors and vendors signed on the Vendor Integrity Pledge where they complied with the COBC and other law and regulation. The overall ethical business practice was regularly monitored through the internal audit conducted by the RSQM team. Based on the Code of Business Conduct, it explains where to get guidance, raising a concern or reporting a violation. This is being briefed to the workers during morning muster and internal/external stakeholder meeting.
			The SOU Lavang subscribes to Sime Darby Plantations Sdn Bhd's Code of Business Conduct (COBC) dated August 2020. It contains, among others, the following aspects of business conduct: • Equal opportunity and non-discrimination • Criminal activities • Harassment ad violence • Avoiding conflicts of interests • Guarding against bribery and corruption • How to report a violation. • Anti-money laundering and anti-terrorism financing For recruitment of foreign workers (through agents), the 'SOPP - Workforce Management Unit, WMU-SOPP', Online Vendor Registration (OVR) and the Vendor Code of Business Conduct (VCOBC) were applied.

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

Clause	Indicators	Comply Yes/No	Findings
2.1	2.1.1 (C) The unit of certification complies	Yes	It was evident that SOU 31 continues to comply with most of the applicable laws and
There is compliance with all applicable	with applicable legal requirements. AUDITORS' GUIDE:		regulations. The CU had obtained and renewed license and permits as required by the law. Among others the licenses/permit for the machineries and equipment at Lavang
local, national and ratified international	Relevant legal requirement might differs between states in Malaysia i.e. peninsular,		Palm Oil Mill were viewed.

Clause	Indicators	Comply Yes/No	Findings
laws and regulations.	Sabah & Sarawak. 2) Give focus on social related legal requirement such as Sabah Labour Ordinance, Child Rights & Protection, Human Rights, Immigration Act, Passport Act, etc. 3) Please note on the process of the following during audit (where applicable): i) foreign workers legalization (Program Pemutihan), ii) foreign workers recruiting through agent and quota basis vs walk-in application iii) Immigration permit renewal process.		 (a) Factory and Machinery Act 1967 (b) EQ (Prescribed Premise) Crude Palm Oil Regulations 1977 (c) Air Monitoring (d) Audiometric Test Programme (OSHA (Noise Exposure) regulation 2019 Reg.9(1) and 9(9a). (e) Chemical Health Risk Assessment (CHRA) (f) Annual Medical surveillance
	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	Lavang 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. a) 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. b) The RSQM Department is responsible to track changes and the information was disseminated to all its plantations and Mill department. c) The latest legal register was update by RSQM on 30/08/2022 to include the following. • Employees' Social Security (Amendment) Bil 2022 • Employment Insurance System (Amendment) Act 2022 • Anti-Sexual Harassment Act 2021 • Fire Service (Fire Certificate) Amendment Regulations 2020 • Pembangunan Sumber Manusia Berhad Act 2001 • Minimum Wages Order 2022
	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. All the physical markers/Boundary stones along the legal boundaries between was visibly available
2.2 All contractors providing operational services and supplying labour and	2.2.1 A list of contracted parties is maintained.	Yes	List of contractor parties were maintained at Estates and Mill at the SOU Lavang. These were all maintained and updated accordingly. The list contains details of the stakeholders, addresses and contact details. A list of contracted parties is maintained in the List of Stakeholders 2021 at SOU Lavang and updated in Jan 2022 and Sept 2022.

Clause	Indicators	Comply Yes/No	Findings
Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	Yes	All contracts 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: 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	Sime Darby Lavang POM is currently have established the following for the directly source of FFB: a) Information on geo-location of FFB origins. b) Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder The evidence of the current document is available in the 'Smallholder Mapping' and Desktop review. At present the mill only possessed the valid MPOB licenses and Land Title for all the directly source FFB and Report as verified by the auditor.
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	NA	Currently in Lavang POM there is no practice of indirectly source of FFB. All FFB are received direct from the suppliers (own estates)

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 business plan and budget were available and kept in soft copy. The documents were categorised as confidential. Information in the documents were sighted and briefed by the Estates/Mill Managers. Generally, the estates business plan was towards sustainable business and prepared in a 3-to-5-year horizon. The components of the business plan are presented in a budget format comprising of the following. a) Crop yielding area b) Yield statement oil palm c) Total upkeep & cultivation d) Labour statement/Allocation of wages/Labour benefit summary e) Summary of vehicle and running schedule/Job allocation for vehicles f) Summary of workshop running schedule g) Summary of general charges h) Summary cost/ha & cost/mt FFB i) CAPEX The cost of production was reviewed and compared against expenditure each year with projections in place for future years. While provisions at mill, include the activities for milling process, general charges, RSPO compliance and capital expenditure.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	Yes	Long-Range Replanting Programs (LRRP) up to 2027 were made available. The program was reviewed once a year and was incorporated in their annual financial budget. The current year plus 5 years replanting programs in Hectares were sighted accordingly.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken. AUDITORS' GUIDE: 1) Check the management review agenda. Confirm that the meeting has discussed and addressed all the required. 2) Should there be any internal audit carried out internally, check on the findings, the closure and the completeness of actions taken to address the internal audit findings.	Yes	Lavang 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. Among the management review were discussed are: Internal audit findings Stakeholders feedback, complaint and grievance Status of preventive and corrective actions Changes that could affect the management system Recommendation for improvement

Clause	Indicators	Comply Yes/No	Findings
			Management has transparent to address continuous suitability, adequacy and effectiveness of the requirements for effective implementation of RSPO Generally, the meeting discussed the effectiveness of the present management system and policies. Members also focused on the forthcoming external audit and also the status of previous findings closure.
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations. 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. AUDITORS' GUIDE: 1) Apart from operational procedures to the mill & plantation, ask for procedures on how the company manage their foreign workers ercuitment through contractors as these issues were considered as high-risk i.e. recruitment process, training, benefits, probation, payment of permit/passport etc.	Yes	The action plan for continuous improvement was implemented, based on consideration of the main social impacts and opportunities of Lavang CU. CAPEX Project to improve living condition of all workers: Furthermore, sighted several mechanisms to improve on social impacts and opportunities was implemented.	
	Verification by the audit team on the RSPO metrics template which includes all the operating units under SOU 31 was found to be acceptable.		
	Lavang SOU 31 adopted the following Manuals and Standard Operating Procedures (SOPs) for the day to day operations of the estates and mill. It includes the operation activities in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. At Lavang Palm Oil Mill, the mill processing systems documented in the Sustainability Plantation Management System MQMS/SQM/08 dated 01/11/2008 which includes the Mill SOP, and Mill Quality Management Manual 2008/MQMS/QMM/08. These documents provide guidelines and standards in the mill operations. The Standard Operating procedures (SOPs) described details from the reception, sterilization, threshing, pressing, clarification, nut polishing station, effluent, laboratory, workshop, dispatches etc. In addition, there are also manuals available within the industry and MPOB that are used as guidelines. The Quality Management System SOPS and Standard Mill Operations also come with pictorial work instructions (PWI) which are displayed and briefed to workers.		
			The SOPs for Lavang SOU 31 continued to be documented, consistently implemented and monitored. 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 and employees had followed the established SOPs.

Clause	Indicators	Comply Yes/No	Findings
			All the estates and mill operations were guided through the manuals and SOPs. The procedures as documented in the Agriculture Reference Manual were disseminated to the staff/workers through morning briefings and trainings. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The procedures were communicated to workers through training and infield supervision. Interview with workers showed that the information in the procedures had been effectively communicated. The SOPs for the SOU 31 are being maintained, documented and kept in the respective CU offices.
	3.3.2 A mechanism to check consistent	Yes	The the estates and the mill had established mechanisms to ensure consistent
	implementation of procedures is in place.		implementation of procedures. Some of the mechanisms are internal audit, management
			review, regulatory visit, Agronomic advisory report, etc. The organization had planned
			internal audit once per year. Internal audit conducted by trained internal auditor from
			Group Sustainability Department. Information of internal audit as per below: Operating Unit Date
			Dulang 23/5/2022
			Lavang 26/5/2022
			Lavang POM 25/5/2022
			Chartquest 26/5/2022
			Kelida 28/5/2022
			Rasan 24/5/2022
			Belian 18/5/2022
			Pekaka 24/5/2022
			Ruai 27/5/2022
			Paroh 19/5/2022
			Both the estates and the mill had established mechanisms to ensure consistent implementation of procedures. All the above records were kept for a minimum period of
			12 months.
			All sampled estate and mill line site have been visited and the found no breeding ground
			for mosquitoes at housing areas, drainage was well maintained, and PPE provided free of charge.
			Thus, previous NCR was satisfactorily closed.
	3.3.3 Records of monitoring and any	Yes	Lavang Palm Oil Mill had an established mechanism to perform checking to ensure
	actions taken are maintained and		consistent implementation of procedures. The mechanisms to check the implementation
	available. AUDITORS' GUIDE:		of procedures were carried out through RSPO internal audit report on visits made by RSQM team, safety and health meeting and routine inspection (workplace inspection) by
	1) Records are essential evidence for		assistant manager, staff and hospital assistant. In addition, the mechanisms to check the

Clause	Indicators	Comply Yes/No		Findings		
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	implementation. 2) Some records related to migrant workers employment were; a) the monitoring of fees that migrant workers pay before they depart from their home country, b) demand letters, c) MoUs and agreements between recruitment agents the CH and the consulates/embassies for the migrant workers. 3) The company should provide relevant records as evidence on how they manage and monitor their contractors' compliance against the RSPO requirements e.g. legality of the workers, appropriate license, employment contract, insurance and wages, for the workers employed thru the contractors. 4) Records of new workers recruitment process, training, benefits, probation, renewal of permit/passport shall be sampled and reviewed. 3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	Yes	The their activ asse activ Oper	CU acritice: essreritice: a) b) c) d) e)	Lavang Palm Oil Mareas Daily Schedule Annual J has also establistivities. Environments such as FFB ment. Identifications and processes of an and impact ents for both establistivities. Environments for both establistivities and processes of an and impact ents for both establistic	Action/Activities Supervision by staff/Assist Manager Report of daily activities/costings/variation Quarterly ESH meeting Internal audits by RSQM – 25/05/2022 Region safety officer 2x/year visits External audit RSPO /MSPO Regional CEO / GM visit. Annual EPMC Medical surveillance shed its environmental aspects/impacts register associated with nental aspect and impact (EAI) which covers from upstream reception until downstream processes was sighted during on and evaluation of environmental impact was done for all related to the mill operation. assessments relating to environmental impacts based on state and mill. The register covers the estate and milling the significant environmental aspects related to the estate ctivities from. and disease, upkeep programme, spraying, manuring tion to the mill.

Clause	Indicators	Comply Yes/No	Findings
	2.4.2 For the unit of contification, a SEIA in		Social Impact Assessment (SIA) Report for Lavang CU (SOU 31 Lavang & SOU 34 Pekaka) was verified. The assessment was carried out at SOU Pekaka on 26 – 29 September 2016 and SOU Lavang on 20 – 27 September 2016. The SIA was done by Social & Environmental Project Unit, PSQM Department. Internal and external stakeholders were consulted during the assessment. The assessments were used methodology of interview workers based on workstation, harvesters, sprayers, worker representatives, gender committee, contractor, supplier, local community (Rumah Panjang), neighboring estate/smallholders, government agencies, NREB Bintulu & CLC/school. The SIA Report also included the baseline for socio economic data of all estates and mills and the social profile, as well as their stakeholders. The report also contained the estates and mill's background information, labour policies, grievance procedures (internal and external), sexual harassment policies, facilities and amenities offered by the estates, and the social impact assessment procedures and results. The secondary data collection – document review/file checking also been made. The report includes both positive and negative impact and its recommendation.
	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. AUDITORS' GUIDE: 1) To ensure adequate stakeholder involvement", auditors can look for evidence that the CH considers internal/external input i.e. union minutes, JCC meetings, workers	Yes	The organization had made available their EAI as per stated in <i>indicator 3.4.1</i> . Latest updated for EAI and Social action plan has been reviewed with certain action has been taken. Each CU i.e Lavang POM, Chartquest Estate, Pekaka complex and Paroh Estate has been noted in their SIA action plan on issues has been brought up. Therefore, previous NCR was satisfactorily closed.
	complaint log book and any other sources apart from stakeholder meeting as the sources of stakeholders input and to demonstrate their involvement. 2) Do the stakeholders include Orang Asli or indigenous people? Refer to AUDITORS' GUIDE IN REPORTING ORANG ASLI MATTERS at the end of this checklist.		
	3)To ensure participation of internal stakeholder like workers are with appropriate representatives – all races, job scopes, male & female etc. 4) To ensure that replanting activities and workers involved sampled. 5) To ensure available positive impacts were identified, included, and promoted into the SEIA by the CH.		

Clause	Indicators	Comply Yes/No	Findings
	6) To ensure negative impacts were identified and mitigated appropriately. 7) Mechanism to monitor the plans established shall be evident.		
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. AUDITORS' GUIDE: 1) Please check any changes that may trigger the renewal of the SEIA assessment i.e. change of stakeholders composition, current situation and condition in comparison with the baseline year.	Yes	Environmental Aspect and Impact Assessment (EAI), Management Action Plans and Pollution Preventive Plan which covers form upstream activities such as FFB reception until downstream processes was sighted during assessment. Last reviewed on 16/04/2022 for the estate management. Identification and evaluation of environmental aspect impact was done for all activities and processes related to the mill operation. 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. At all estate visited, field activities that includes fertilizing, spraying, transportation of FFB, garbage disposal, landfill management, road maintenance, wildlife and land conservation activities. The mitigation measures were continued to be implemented to minimize the negative impacts. Sighted the latest external stakeholders' minutes meeting for whole SOU 31 Lavang & SOU 34 Pekaka conducted on 18/9/2022 & 02/8/2022 at Desa Lavang Community Hall & Dewan Sri Dulang was carried out to external and internal stakeholders i.e., government agencies, school, villagers and private sectors (contractors and neighboring estates). Evidence of the above stakeholder consultation conducted are available and the stakeholder feedback were recorded in the SIA action plan.
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. AUDITORS' GUIDE: 1) Appropriate language is used for the employment procedures – Bahasa Malaysia, English and language understood by all workers or their representative.	Yes	SDPB has developed Workforce Management Unit Liaison & Recruitment (LR) Procedure: Hiring local workers - SOP Hiring of Local Workers, Doc. No. 01-11-19. Hiring foreign workers - SOPP Workforce Management Unit, WMU-SOPP Termination – Industry Relation Manual – 08. Misconduct and Discipline. The recruitment process was clearly stated in the procedure where the recruitment was based age, medical fitness and etc. Meanwhile, for promotion process are available for the local & foreign workers in the amended procedures under "Title: Career Progression for Workers Level", dated 01/01/2020.

Clause	Indicators	Comply Yes/No	Findings
	2)Workers – local/ foreign/ contractors/ Orang Asli/ male & female 3)Get confirmation from workers (as stated above) that they understand the employment procedures content.		SDPB also has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2nd December 2019, where the management is committed to contributing to a better society includes respecting, upholding & no-exploitation of fundamental human rights, providing safe and healthy workplaces and protecting workers' welfare and engaging and empowering communities.
	3.5.2 Employment procedures are implemented, and records are maintained.	Yes	The employment procedure as described above are implemented, and records were maintained. Due to the shortage of workers, Lavang CU have implemented Local Requirement Project starting October 2020 to employ local workers i.e., Iban & Penan from Kapit, Belaga and Murum as this is the engagement between Sime Darby and the government i.e. District Officer & JTK. The personal file and employment contracts for local worker was sighted. Based on interview with employees, no contradiction in term of procedures compliance.
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. AUDITORS' GUIDE: 1) Apart from updating the HIRARC based on accident/incidence repot, auditor needs to further enhance this activity to ensure details in the HIRARC is appropriate. 2) As for reporting, review the correctness and effectiveness of details in the HIRARC.	Yes	The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subjected for a review in event of the following; a) Change in work process b) Revision/changes in legislative requirement c) Occurrence of accidents The estates had list of review on HIRARC respectively for the estates and mill. All operations are risk assessed to identify H&S issues as per SDPB OSH Risk Management Procedure Doc: UM/HSE/SP/01 approved date 09/03/2021. Mitigation plans and procedures are documented in the HIRARC and implemented. HIRARC for the mill was formalized on in 2008 with review made annually; the latest being on 19/03/2022. Safety procedure has been established to assists CU related to implementation on i.e ESH compliance management, doc. No: SD/SDP/PSQM(ESH)/2014-OD11 and Pictorial Safety Standard. Among the objective of the procedure to ensure CU compliance with all the regulation and minimize the risk of noncompliance.

Clause	Indicators	Comply Yes/No				Findings	
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	Yes	a) b) c) The	impl ers		ss I & class II.	
					Task	Activity	
				1	OSH Legal Compliance	Review all relevant legal compliance	
			-	•	Oor Legal Compilaries	ERP Training	
				2	Emergency Response Plan	Fire drill	
					3, 3, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,	Enforcement Visit	
				3	OCI I Management System	Review documentation	
				3	OSH Management System	HIRARC review	
						Identify High Risk Area	
				4	Risk Management	maintenance	
			-			Hygiene Tech	
				_	Accident Investigation/	Accident Investigation	
					Reporting	JKKP 6/7/8 submission Chemical Register	
3.7 All staff, workers, Scheme Smallholders, outgrowers, and	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	Yes	esser availa	ntial able a	operations activities has been eand verified. Training needs idenentation. Some of the training solutions	all aspects of the RSPO Principles and Criteri established. Regular assessments of training atification matrix has been established with targ	needs were
contract workers are appropriately trained.	covers applicable aspects of the RSPO			2	Environmental	Quality Act & Regulations 1974	
appropriatory trained.	P&C, in a form they understand, and which includes assessments of training.			3	Factorie	es & Machinery Act 1967	
	AUDITORS' GUIDE: 1) Sample training for everyone – staffs, workers, contractors.			4		ental, Safety & Health Policy	
				5	Understanding of	Group Policy & Authority (GPA B.4)	
				6		sure Of Chemical Hazardous to Health (USECHH) 2000	
				7		HIRARC	
				8	Notification of Ac	cidents and Dangerous Occurance	
				9	OSH Commi	ittee Function & Responsibility	
				10	OSH Coordin	ators Function & Responsibility	

Clause	Indicators	Comply Yes/No		Findings
			11	Foreign Workers Induction Programme
			12	Harvesting Induction Training
			13	Accident Investigation Techniques
			14	Chemical & Spraying Safe Operating Procedures
			15	First Aid Training
			16	Safe Driving Technique
			17	Guidelines (Highly Toxic Pesticides) Reg 1996
			18	Emergency Respond Plan (e.g Chemical Spill, poisoning, fire, lighting)
			19	Scheduled Wastes Management - Inventory, labelling, disposal, handling
			20	What is SDS
			21	Environmental Rsponsibility & Biodiversity - Environmental Aspect Impact Assessment
			22	Fire Drill Training
			23	Effective Work Place Inspection/Audit
			24	Personal Hygiene and Health
			25	OHSAS 18001
			26	5S House Keeping
			27	RSPO Training
			28	Maintenance of Spray Equipment & Calibration
			29	PPE Training & Demonstration
			30	Preventive Maintenance Vehicle Training
			31	RB Spraying Method
			32	Triple Rising Training and Demonstration
			33	Townhall Briefing
			34	Global Gap (CP&CC)

Clause	Indicators	Comply Yes/No		Findings	
			35	International Labour Organizational	
			36	Passport Keeping	
			37	Housing & Amenities Procedures	
			38	Human Rights Defender Policy	
			39	Grievances Channels	
			40	Social Dialog Function & Responsibility	
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	Yes	RSPO trair and signatu	avang had trained their staff, workers and records of training were kening file. The records included information on the title of the training ure of the attendees, name of the trainer, time and venue. The training Mill and Estates.	ng, name
	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	implementa on 18/08/2 photograph	training for personnel carrying out the tasks critical to the tion of the Supply Chain Certification Standard (SCCS) has been of 022 by Group Sustainability Department (GSD) and Attendance was seen. Internal training also has been conducted by Engineer t and 20/05/2022. Training for contractor transporter has been carried 022.	conducted ce list & to PIC on

SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating	N/A	Lavang Palm Oil Mill (LPOM) sourced for their FFB only from estates under the same SOU which involve 9 supply bases (estates). They were Lavang, Rasan, Kelida, Pekaka, Belian, Dulang, Chartquest, Paroh, Ruai Estate another certified and another SOU Estate Derawan and Takau Estates. 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.

a, the inly MB Module is cable. Is balance Module Il is deemed to be MB is the process FFB from both RSPO fied and uncertified tations/estates. A mill may be g delivery of FFB from partified growers, in addition to	Yes	Not applicable since LPOM used Identity Preserved Model					
Il is deemed to be MB is the process FFB from both RSPO fied and uncertified tations/estates. A mill may be g delivery of FFB from partified growers, in addition to	Yes	Not applicable since LPOM used Identity Preserved Model					
e from its own and 3 rd party fied supply base.		Not applicable since LPOM used Identity Preserved Model					
The estimated tonnage of CPO and PK products that could potentially be produced		As provided in the report above – Table 3 (actual) & 4 (projection) as per below: Table 3: Actual FFB received and CPO & PK dispatch by Lavang POM for period from					
		<u>December 2021 – September</u>	2022				
public summary of the P&C		RSPO Supply Chain Model : IP	Total (MT)				
		FFB Received	136,545.08				
		FFB Processed	136,538.74				
		Certified FFB Processed	136,538.74				
		Non-certified FFB Processed	0				
)				
		Overall CPO Production	29,621.54				
actual tonnage produced		Certified CPO Production	29,621.54				
then be recorded in each		Certified CPO delivered as RSPO	25,747.40				
equent annual		Certified CPO delivered as non-RSPO	0				
		Certified CPO delivered under other sustainable schemes	0				
siliarios report.		Palm Kernel (PK)					
		Overall PK Production	7,086.35				
		Certified PK Production	7,086.35				
		Certified PK delivered as RSPO	6,969.14				
		Certified PK delivered as non-RSPO	0				
		Certified PK delivered under other sustainable schemes	0				
		Credit traded under Book & Claim	0				
d de receive	estimated tonnage of and PK products that potentially be produced be certified mill shall be ded by the CB in the commany of the P&C cation report. This figure sents the total volume of ed oil palm product (CPO PK) that the certified mill owed to deliver in a year actual tonnage produced	estimated tonnage of and PK products that potentially be produced e certified mill shall be ded by the CB in the summary of the P&C cation report. This figure sents the total volume of ed oil palm product (CPO PK) that the certified mill owed to deliver in a year. actual tonnage produced then be recorded in each equent annual	As provided in the report above – Table 3 (actual) & 4 (projection) Table 3: Actual FFB received and CPO & PK dispatch December 2021 – September RSPO Supply Chain Model : IP RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September RSPO Supply Chain Model : IP December 2021 – September December 2021				

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings	
			Table 4: Projected FFB received and CPO & PK dispatch	by the Mill of the next reporting period
			(October 2022 – Septemb	<u>er 2023)</u>
			RSPO Supply Chain Model : Identity Preserved	Total (MT)
			FFB Received	255,977.21
			FFB Processed	255,977.21
			Certified CPO Production	57,466.88
			Certified PK Production	13,464.40
	requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).		Member name Member Name: Lavang Oil Mill Palm Trace Account ID: RSPO_AC1000000313 Website: www.simedarbyplantation.com Holding Name: SIME DARBY FUTURES TRDNG SDN BHD GPS Coordinates (Latitude, Longitude): 3.4283333, 113.600 License Information Commodity: Palm Oil Palm Trace Member ID: RSPO_PO1000000304 RSPO Membership Number: 1-0008-04-000-00 Type of Business: Oil mill License Status: Active (30.04.2022, 30.13.2023)	

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's	Yes	Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia" document ID: SD/SDP/GSD/SCCS/0522/01, approved in May 2022 and effective 1 Jun 2022. The procedure described the following: Clause 3.0 ~ Scope Clause 4.0 ~ The responsibility of for the implementation of RSPO SCC i.e. head of operating unit Clause 5.0 ~ Control of document & records such as weighbridge tickets, consignment note, training record & contracts. Record retention for 10 years. Define the critical control point (CCP): estate — weighbridge, mill — weighbridge, admin office, ramp, CPO despatch area, CPO storage tank. Kernel silos. Clause 6.0 ~ Delivery of FFB from the estate — relevant record involved, flowchart for crop diversion, list of mill and their supply chain model i.e. IP or MB Clause 7.0 ~ Receiving FFB at the mill — list of supply base, rules for determining diverted FFB destination, relevant record Clause 8.0 ~ ISCC Compliant waste / residues materials Clause 9.0 ~ Process monitoring — for IP model mill need to ensure no mixing of RSPO certified and non-certified and MB model Clause 10.0 ~ CPO and PK despatch — [Clause 9.1] all delivery of CPO and PK shall be in accordance with the contract allocated by Global Trading & Marketing (GTM) department Clause 11.0 ~ Non-conforming material / product — requirement to downgrade the RSPO Product Clause 12.0 ~ Product claim — shall follow RSPO rules on market communication & claim Clause 13.0 ~ Outsourced contractor - the mill has established list of outsourced contractor. Sighted list of trasporter for CPO and PK. Clause 14.0 ~ Training — the mill shall provide training for relevant personnel carrying the task at tech critical control point (CCP). Clause 15.0 ~ Reclassification of mill's supply chain model - Reclassification of mill's supply chain model may be determined by GTM/ PSQM. CB shall be notified. All communicated shall be recorded. Clause 16.0 ~ Production volume Clause 19.0 ~ Complaints Clause 19.0 ~ Complaints Clause 19.0 ~ Complaints Clause 19.0 ~ Complaints Clau

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	procedures for the implementation of this standard. The site shall have documented procedures for receiving and processing certified and non-certified FFBs.		The Assistant Engineer had overall responsibility and authority over the implementation of RSPO supply chain requirement for Lavang POM. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements. LPOM had continued to implement the procedures it had on receiving and processing of RSPO certified and non- certified FFBs. (Refer para. 7.0 of the SOP - Receiving FFB at the Mill) it has described how LPOM manages the FFB from certified source. No issue regarding receiving Noncertified FFB as this mill is an IP Mill.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.6	The site shall have a written procedure to conduct annual internal audit to determine whether the organisation; Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Effectively implements and maintains the standard requirements within its organisation. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.	Yes	As describe under para 18.0 SOP for Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia issue no 5 dated 1 Jun 2022, DPOM refer to this procedure which is follow the RSPO Supply Chain Certification Standard Revision 2020 requirements. Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2020 requirements. RSPO internal audit was conducted on 25/05/2022.The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents Audit Attendance sheet, audit plan, audit notes and NCR findings were sighted by auditor. Documented procedure has defined management review will be conducted once a year Management review meeting has been conducted on dated 10/06/2022 (combine RSPO, RSPO SCCS and MSPO) Internal audit Customer feedback – data analysis show result from customer survey (i.e., RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result achieved. Previous meeting – was highlighted Changes – There is no significant changes accept transfer of Assistant Manager and changes on supply chain model. Recommendation for improvement – improve the established system

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.7	The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	Yes	Lavang POM had continued to receive certified FFB from own SOU Estate, which is Lavang, Rasan, Kelida, Pekaka, Belian, Dulang, Chartquest, Paroh, Ruai Estate and another certified SOU Estate Derawan and Takau Estates. The validity of the certificate of the supplier has been checked accordingly. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Monitoring records titled as "RSPO & MSPO Mass Balancing Records for Oil Mills" has recorded the tonnage of certified FFB and its supplying estate. Verified through LPOM weighing system called 'Sime Weigh' and random sample of weighbridge ticket from. Among the information available i.e.
	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.		Assessor has verified the Monitoring records titled as "RSPO & MSPO Mass Balancing Records for Oil Mills" has recorded the tonnage of certified FFB and its supplying estate. Sighted that, LPOM no overproduction for all certified product as verified in the accounting system
	Obtain list of all suppliers and list of purchase orders/invoices/ documentation issued between the mill and the suppliers. Check for agreement/contracts signed with suppliers (if necessary). Sampling of purchase orders/invoices shall be done on a random basis and the minimum number of samples selected shall be based on the square root formula for each supplier. Ensure the purchase orders/invoices have the correct supplier's information.		Thus, Past Major NCR RAR 01 2021 has been successfully closed.

Ref. in RSPO	Indicators	Comply	Eindinge
SCCS		Yes/No	Findings
3.8.8	Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation): a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification	Yes	Documented procedures related to sales and goods out were sighted and found adequate. Based on verification during the audit, LPOM has deliver certified materials to end buyer such as Sime Darby Austral KCP for Palm Kernel & Sime Darby Oils Bintulu Sdn Bhd for crude palm oil. Therefore, the records of certified CPO & PK sales activities which comply to standard requirement. .
	number		

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

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 in January 2022.
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 3 years as per Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/GSD/SCCS/0522/01, effective date: 01/06/2022- 5.0 control of documents & records
	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.	N/A	Sighted record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries	Yes	Not applicable CU used IP model

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass 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	LPOM 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). Lavang 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. OER & KER has been updated by daily basis and monthly summary has been used as guidance.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Yes	
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO	N/A	Global Trading & Marketing (GTM) office informed LPOM by e-mail on the dispatch of RSPO certified CPO/ PK to relevant buyer. The dispatch of the RSPO certified CPO/ PK to buyer by LPOM were made based on a specific contract.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.		The receiving pit, pipelines and tanks in LPOM were thoroughly cleaned, swept and flushed before RSPO certified CPO was pumped in to avoid contamination. Dedicated tanks were used to store RSPO certified CPO produced. For traceability of a specific batch of RSPO certified CPO back to the supplying POM, LPOM kept the relevant documents such as the weighbridge ticket, CPO dispatch note, Dispatch oil quality ticket, Authorization from transporter, Borang MPOB L3, CPO dispatch authorization issued by their site.
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform	Yes	ii-Based on verification through RSPO IT Platforms - Palm Trace transaction report -Certificate Allocation Log - there was no activity removed for RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	Yes	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. LPOM has not use RSPO corporate logo as well as trademark logo.

Principle 4: Respect community and human rights and deliver benefits

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

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	Yes	The policy to respect human rights was documented in the Human Rights Charter - http://www.simedarbyplantation.com/sustainability/human-rights-charter . This Policy states among others, that it will develop its businesses with a sense of humanity, ensuring that they are socially beneficial and do not infringe basic human rights. This policy was communicated to all levels of the workforce and operations in Lavang CU dated 30/9/2022. While for FFB suppliers, local communities, and contracted services had been briefed on prohibits intimidation and harassment by the unit of certification during stakeholders meeting at Lavang POM, Dulang Estate and Lavang Estate (18/9/22).
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	Yes	It has been verified that the land is now legitimately owned by SOU Lavang since 18 December 1985. The audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed with the communities. From the interviews, it was confirmed that there is no evidence that the oil palm operations have instigated violence or use any form of harassment in maintaining peace and order in their current and planned operations.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	Yes	The system used by the SOU 31 Lavang in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Tatacara Perundingan Dalam Menangani Masalah Sosial". The Mill and Estates within SOU 31 each has its own Internal Complaint Book and External Communication Book. The Internal Complaint Books are for employees to lodge complaint pertaining to their houses. The external book was reviewed and found no complaints against the CU. When ensuring anonymity of complainants, Human Rights Defenders (HRD), community spokesperson and whistle blowers, the Sime Darby Code of Business Conduct provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ. There is also new channel to complaint, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD name Suara Kami, Ulula, and Whistle blowing Channel.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Yes	The documented system in dealing with complaints and grievances are briefed during muster briefing. At the Lavang Palm Oil Mill, this briefing was given on 30 Sep 2022, and at Dulang Estate on 3 June 2022. To ensure that illiterate parties also understand the procedures, verbal briefings are given are translated into the language the affected parties understand.
	AUDITORS' GUIDE: 1)Appropriate language is made available		Based on interview with stakeholders the system was understood by the affected parties.

Clause	Indicators	Comply Yes/No	Findings
	- Bahasa Malaysia, English and language understood by all workers or their representative. 2) Workers – local/ foreign/ contractors/ Orang Asli, ALL. 3) Get confirmation from workers (as stated above) and other affected stakeholders sampled during the audit that they understand the procedures content – complaint/grievance.		SOU Lavang keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders during stakeholders meeting for the whole SOU on 18/9/2022.
	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	The system used by the SOU Lavang in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Tatacara Perundingan Dalam Menangani Masalah Sosial". The Mill and Estates within the CU each has its own Internal Complaint Book and External Communication Book. The Internal Complaint Books are for employees to lodge complaint pertaining to their houses. The external book was reviewed and found no complaints against the CU. The conflict resolution mechanism includes the option of access to independent legal and technical advice. The complainants may choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. When ensuring anonymity of complainants and whistle blowers, the Sime Darby Code of Business Conduct provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ. However, based on interviews conducted, Sime Darby's whistle-blower policy is not widely known to the workers.
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	Yes	Based on interview with stakeholders the system was understood by the affected parties.
4.3 The unit of certification contributes to local	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	Yes	Contributions to community development that are based on the results of consultation with local communities are demonstrated.

Indicators	Comply Yes/No	Findings
AUDITORS' GUIDE: Do the stakeholders include Orang Asli or indigenous people? Refer to AUDITORS' GUIDE IN REPORTING ORANG ASLI MATTERS at the end of this checklist.		
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. AUDITORS' GUIDE: Do the stakeholders include Orang Asli or indigenous people? Refer to AUDITORS' GUIDE IN REPORTING ORANG ASLI MATTERS at the end of this checklist.	Yes	Evidence of legal ownership of the land including history of land tenure was verified during this audit. For Lavang Dulang, Chartquest and Kelida Estates, the land was previous owned by Wangsa Mujur Sdn Bhd and Golden Hope Plantations (Sarawak) Sdn Bhd. Thereafter to Sime Darby after merging with Sime Darby in 2007. Wangsa Mujur Sdn Bhd and Golden Hope Plantations (Sarawak) Sdn Bhd has bought the land from Sarawak Government on 18 December 1985. 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: 4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. 4.4.2b Evidence that the unit of certification has respected communities' decisions to give or	Yes	As reported in 4.4.1, it has been verified that the land is legitimately owned by SOU Lavang Pekaka. The audit team had confirmed that there were no land issues related to previous owners.
	AUDITORS' GUIDE: Do the stakeholders include Orang Asli or indigenous people? Refer to AUDITORS' GUIDE IN REPORTING ORANG ASLI MATTERS at the end of this checklist. 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. AUDITORS' GUIDE: Do the stakeholders include Orang Asli or indigenous people? Refer to AUDITORS' GUIDE IN REPORTING ORANG ASLI MATTERS at the end of this checklist. 4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include: 4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. 4.4.2b Evidence that the unit of	AUDITORS' GUIDE: Do the stakeholders include Orang Asli or indigenous people? Refer to AUDITORS' GUIDE IN REPORTING ORANG ASLI MATTERS at the end of this checklist. 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. AUDITORS' GUIDE: Do the stakeholders include Orang Asli or indigenous people? Refer to AUDITORS' GUIDE IN REPORTING ORANG ASLI MATTERS at the end of this checklist. 4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include: 4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. 4.4.2b Evidence that the unit of certification has respected communities' decisions to give or

Clause	Indicators	Comply Yes/No	Findings
	operation at the time that these decisions were taken.		
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.		
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	Yes	As reported in 4.4.1, it has been verified that the land is legitimately owned by SOU Lavang Pekaka. The audit team had confirmed that there were no land issues related to previous owners. Consultation with villager representatives found such issues does not occur in Peninsular Malaysia. All local communities had their own land title. There were no issues regarding land with villagers, local community, and neighboring estate
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	NA	This requirement in this indicator does not apply to SOU Lavang Pekaka
	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.	NA	This requirement in this indicator does not apply to SOU Lavang Pekaka
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	NA	This requirement in this indicator does not apply to SOU Lavang Pekaka

Clause	Indicators	Comply Yes/No	Findings
4.5 No new plantings are established on local peoples' land	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	Yes	Based on Social Impact Assessment (SIA) Report for SOU Lavang Pekaka and as reported in Indicator 3.4, there was no new plantings are established in this CU.
where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and twoway process of consultation and negotiation.	Yes	As reported in 4.4.1, it has been verified that the land is legitimately owned by SOU Lavang Pekaka. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. Consultation with villager representatives found there was no new planting operations on villagers' land at SOU Lavang Pekaka.
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are noncoercive and entered into voluntarily and carried out prior to new operations.	Yes	As reported in 4.4.1, it has been verified that the land is legitimately owned by SOU Lavang Pekaka. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. Consultation with villager representatives found there was no new planting operations on villagers' land at SOU Lavang Pekaka.
	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	Yes	As reported in 4.4.1, it has been verified that the land is legitimately owned by SOU Lavang Pekaka. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. Consultation with villager representatives found there was no new planting operations on villagers'

Clause	Indicators	Comply Yes/No	Findings
	provisioning options are considered. There is transparency of the land allocation process.		land at SOU Lavang Pekaka.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	Yes	As reported in 4.4.1, it has been verified that the land is legitimately owned by SOU Lavang Pekaka. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. Consultation with villager representatives ound there was no new planting operations on villagers' land at SOU Lavang Pekaka.
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	Yes	As reported in 4.4.1, it has been verified that the land is legitimately owned by SOU Lavang Pekaka. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. Consultation with villager representatives found there was no new planting operations on villagers' land at SOU Lavang Pekaka.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	Yes	There were no new lands acquired for plantation and mills after 15 November 2018. The current operation area including mill and estates as per stated in the land title.
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	Yes	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System document issued on 1 November 2008 (Version 1) entitled "Procedures for Handling Boundaries Disputes". In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
system that enables indigenous peoples, local communities and other	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or	Yes	In accordance with the 'Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at mill and visited estates.

Clause	Indicators	Comply Yes/No	Findings
stakeholders to express their views through their own representative institutions.	otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.		
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	Yes	There were no scheme small holdings at Lavang CU. The Fresh Fruit Bunches are supplied from SDPB owned estates which are certified to RSPO.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	Yes	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	Yes	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System document issued on 1 November 2008 (Version 1) entitled "Procedures for Handling Boundaries Disputes". In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	Yes	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighbouring estate. This has been confirmed through the interviews with villager representatives, who were present during the consultation.
agreements.	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	Yes	It has been verified that the land is legitimately owned by SOU Lavang Pekaka since 18 December 1985. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. Consultation with villager representatives found such issues does not occur in SOU Lavang Pekaka. All local communities had their own land title.
4.8 The right to use the land is demonstrated and is not legitimately	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal,	Yes	It has been verified that the land is legitimately owned by SOU Lavang Pekaka since 18 December 1985. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. Consultation with villager representatives found such issues does not occur in SOU Lavang Pekaka. All local communities had their own land title.

Clause	Indicators	Comply Yes/No	Findings
contested by local	customary, or user rights at the time		
people who can	of acquisition is available and		
demonstrate that	provided to parties to a dispute, and		
they have legal, customary, or user	that any compensation was accepted		
rights.	following a documented process of FPIC.		
	4.8.2 (C) Land conflict is not present	Yes	Land conflict is not present in the area of the unit of certification. Consultation with villager
	in the area of the unit of certification.		representatives found such issues does not occur in SOU Lavang Pekaka. All local communities
	Where land conflict exists, acceptable		had their own land title.
	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.		
	4.8.3 Where there is evidence of	Yes	There was no evidence of acquisition through dispossession or forced abandonment of customary
	acquisition through dispossession or		and user rights prior to the current operations. Consultation with villager representatives found such issues does not occur in SOU Lavang Pekaka. All local communities had their own land title.
	forced abandonment of customary		Such issues does not occur in 500 Lavang Ferana. All local confindinties had their own land title.
	and user rights prior to the current		
	operations and there remain parties with demonstrable customary and		
	land use rights, these claims will be		
	settled using the relevant		
	requirements (Indicators 4.4.2, 4.4.3		
	and 4.4.4).		
	4.8.4 For any conflict or dispute over	Yes	There was no conflict or dispute over the land. It has been further confirmed through Consultation
	the land, the extent of the disputed	100	with villager representatives found such issues does not occur in SOU Lavang Pekaka. All local
	area is mapped out in a participatory		communities had their own land title.
	way with involvement of affected		
	parties (including neighboring		
	communities where applicable).		

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	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders. 5.1.2 (C) Evidence is available that the unit of certification regularly explains the	Yes	Fresh Fruit Bunches were supplied from SOU Lavang Pekaka owned estates, which is Lavang Estate, Belian Estate, Rasan Estate, Kelida Estate, Pekaka Estate, Ruai Estate, Dulang Estate, Paroh Estate, and Chartquest Estate. Thus, This Indicator is not applicable as Lavang Pekaka Palm Oil Mill only receives FFB from its own supply within SOU Lavang Pekaka, and none from third party suppliers. Fresh Fruit Bunches were supplied from SDPB owned estates (Lavang Estate, Belian Estate, Rasan Estate, Kelida Estate, Pekaka Estate, Ruai Estate, Dulang Estate, Paroh
local businesses.	FFB pricing to smallholders. 5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	Estate, and Chartquest Estate) which are certified to RSPO. There was no third-party FFB's sent to the mill. Thus, no contract involved with smallholder. Fresh Fruit Bunches were supplied from SDPB owned estates (Lavang Estate, Belian Estate, Rasan Estate, Kelida Estate, Pekaka Estate, Ruai Estate, Dulang Estate, Paroh Estate, and Chartquest Estate) which are certified to RSPO. There was no third-party FFB's sent to the mill. Thus, no contract involved with smallholder.
	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	Fresh Fruit Bunches were supplied from SDPB owned estates (Lavang Estate, Belian Estate, Rasan Estate, Kelida Estate, Pekaka Estate, Ruai Estate, Dulang Estate, Paroh Estate, and Chartquest Estate) which are certified to RSPO. There was no third-party FFB's sent to the mill. Thus, no contract involved with smallholder.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	Yes	The SOU has demonstrated that the contractors (CPO&PK transporter) has been provided with a contract document. Based on documents review, there is evidence that the contractor company understand the contractual agreements entered into. These include the payment terms and mechanism for the calculation of price, including their rights and obligations. The contractor also confirmed that the contract was fair, legal and transparent.

Clause	Indicators	Comply Yes/No	Findings
			Consultation with contractors and suppliers' representatives confirmed they are understood of their rights and obligations under the contract. Consultation was made with the contractors confirmed the fairness of the terms of their contract, and payments are usually received within the required timeline. There was no third-party FFB sent to the mill. Thus, no contract involved with smallholder.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Yes	These contractors interviewed confirmed that payments are made in a timely manner,. Fresh Fruit Bunches are supplied from SDPB owned estates (Lavang Estate, Belian Estate, Rasan Estate, Kelida Estate, Pekaka Estate, Ruai Estate, Dulang Estate, Paroh Estate, and Chartquest Estate) which are certified to RSPO. There is no third-party FFB sent to the mil, Thus, no contract involved with smallholder. The contractors and Suppliers are quite satisfied with the payment using MEX System.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Yes	Weighing Equipment in Lavang POM has been calibrated by yearly basis using accredited weighing company Metrology Corporation Malaysia Sdn Bhd on 21/6/2022. And for Dulang Estate on 17/12/2021.
	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 Lavang Pekaka 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 (GS) on 19/8/22 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. While for FFB suppliers and contracted services had been briefed on prohibits intimidation and harassment by the unit of certification during stakeholders meeting at Rajawali Hall on 10 August 2022.
	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 a) Additionally, there is also the "Whistle Blowing Channel" and Human Rights charter which was revised on 2020). b) The Dispute and Resolution Procedure commences with the receipt of complaint from any party, its investigation, proposed solutions and acceptance of the solutions or otherwise. If the proposed solution was rejected, the dispute will be brought for third party arbitration. c) Grievance or dissatisfaction and request for services on the part of the smallholder can be conveyed through the "Borang Aduan (Complaints Form)"-and the "Borang Permohonan (Request Form)" Sime Darby Whistleblowing Policy ensures anonymity. The Policy contains the Whistle Blower Complaint Response where the complainant has the option of remaining anonymous by not revealing his/her identity.

Clause	Indicators	Comply Yes/No	Findings
			A grievance procedure is also contained in the Social Impact Assessments for SOU Lavang which defines what a grievance is. It also states that it is the responsibility of the Estates and Mill together with the respective Social Liaison Officers to educate staff and workers about the grievance procedure, and that the workers must be well aware of the grievance procedure and their rights to complaint their grievances. The grievance mechanism identifies who can submit complaints (public, staff, workers, villagers), who can receive the complaints (clerk, chief clerk, assistant manager, manager). There is also a flowchart on how the dispute is to be handled.
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 Lavang Pekaka 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 Sighted that latest Engangement meeting namely Engagement with smallholders by Group Sustainability (GS) on 19/8/22 to promote on RSPO certification 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.
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	Yes	Sime Darby SOU Lavang Pekaka 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 Sighted that latest Engagement meeting namely Engagement with smallholders by Group Sustainability (GS) on 19/8/22 to promote on RSPO certification 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, there was no response from stakeholder related to RSPO certification. This was related to the cost of the certification.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	Sime Darby SOU Lavang Pekaka provides support to smallholders to promote legality of FFB production Sighted that latest Engagement meeting namely Engagement with smallholders by Group Sustainability (GS) on 19/8/22 to promote on RSPO certification 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, there was no response from stakeholder related to RSPO certification. This was related to the cost of the certification. The attendance was from nearby villagers such as Tuai Rh Edward, Rh Robert, Rh Satin.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Yes	Fresh Fruit Bunches were supplied from SDPB owned estates. There was no third-party FFB, or scheme smallholders sent to the mill

Cla	ause	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	Fresh Fruit Bunches were supplied from SDPB owned estates which are certified to RSPO. There is no third-party FFB, or scheme smallholders sent to the mill

<u>Principle 6: Respect workers' rights and conditions</u>
Protect workers' rights and ensure safe and decent working conditions.

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	Yes	The equal opportunities policy is contained within the Sime Darby Social Policy dated January 2015, which states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. The Social Policy was displayed on notice boards in both Bahasa Malaysia and English. To further verify the understanding during onsite audit. The policy of Group Sustainability and Quality Policy Statement has been approved by Group Managing Director, Mohamad Helmy Othman Basha, dated 2/12/2019. The policy shall be guided by the commitments spelt out in the company's: Responsible Agriculture Charter (RAC) Human Rights Charter (HRC) Innovation & Productivity Charter (IPC) Para 3.2.5 in the HRC clearly stated promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. SDPB according to the statement, also will facilitate opportunities for advancement for their employees, especially women by removing barriers to progress and respecting reproductive and maternal rights. SDPB has implemented new Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/09/2019. The policy shall be guided by the commitments spelt out in the Company's in Human Rights Charter (HRC) where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age. The policy was communicated via ILO Briefing through the muster briefing to Dulang Estate, by Manager

Clause	Indicators	Comply Yes/No	Findings
Clause	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. AUDITORS' GUIDE: 1) Foreign and migrant workers should not pay anything that a local worker is not required to pay, unless mandated by law. 2) Evidence is available that all statutory payments have been made by the employer. 3) CU will comply and pay for all statutory payments listed, recruitment fees and processing documentation by registered/accredited recruitment agent at the respective source country, and transportation (flight ticket) from sending country to entry point, and return upon completion of the contract. 4) Check the details of contract agreement between employer & agency and the workers & agency.		on 29/1/2022 in Chartquest Estate and by Assistant Manager on 25/1/2022 at Lavang Estate. During the housing inspection, an interview session was conducted, and it was found that the workers were aware on the policy communicated during muster briefing and placed publicly in the notice board at housing area and office. It is also being explained during the induction course for the newly arrived workers. Interviewed with the workers comprises of different gender and nationalities as well as the local workers (Penan & Iban) confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers, no charging of recruitment fees for the foreign workers and offered job based on capability. The worker can request for job transfer if they found they unfit for the job assigned to them.
	5) CU needs to have clear company policy on this, and it may be provided in the company recruitment procedure.		
	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	SDPB has established the Career Progression for Workers Level (both local and foreign workers), Doc. No.: SDP/HRUM/2020/SOP01 where the promotion of workers is based on the work performance, suitability and the leadership quality of the worker. For requirement, SDPB has established the Hiring of Local Workers procedure and Workforce Management Unit Liaison & Recruitment procedure to explain the recruitment processes for both local workers.
			Based on interviews with the estate and mill management including documentation review (interview assessment and medical report), recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness

Clause	Indicators	Comply Yes/No	Findings
			appropriate for the job. Interview of candidates will be done by Manager and the Assistant Managers where an evaluation form is filled up to determine the suitability of the candidate. Noted the evidence during the audit.
			There is no discrimination based on religion, gender, nationality etc., during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder's consultation, worker's interview, complaint book and trade union meeting. Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste.
	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	Pregnancy test conducted in Lavang CU only when the female worker seeks Medical Assistant for treatment. If the workers confirmed pregnant, Medical Assistant would issue a recommendation letter to Assistant Manager for work change to light work and not involved in any chemical. Confirmed through the interview session to female workers, Medical Assistant and Gender Committee Minute of Meeting.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	Yes	The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly. Lavang CU have implemented Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. It explained the types of gender-based violence & grievance procedures. Meetings were conducted quarterly according to the handbook. Gender Committee were established by the mill and estates management.
			Gender Committee was established in Lavang CU. Interviewed with the Chairman of Gender Committee in Lavang POM and estates confirmed no case of sexual harassment or violence reported. Activity such as hiking was organized by the committee which involved the family members as well.
			The gender committees throughout the Lavang CU are known as the 'Gender Committee' comprise female employees. Based on interviews of the committee members and review of meeting minutes, the committees' main activities are to provide awareness to its members on issues of concern. Meetings are generally held once a year. It was noted that the committee had discussed the following matters: • training on women's rights. • counselling for women affected by violence. • childcare facilities to be provided by the growers and millers; • women to be allowed to breastfeed up to nine months before resuming chemical spraying or

Clause	Indicators	Comply Yes/No	Findings
			 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	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. Interview with workers local female, migrant) and local male, they agreed that they have received equal pay for the work given. For example, sprayer gang has been paid by piece rate and the same gang also receive the piece rate pay. For harvester also they received the same rate for all harvesters in the estate. Any differences for the pay rate will be for tall palm and the short palm. For mill and estate general workers they receive daily payment as per Minimum Wages Order Amendment 2020.Based on interview and documentation records, there is evidence that equal pay for the same scope of the job. There is no discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder's consultation, worker's interview, complaint book and meeting with worker representative. Sighted the job description of each worker mention the same regardless of skin colour, religion, race or caste. The equal pay can be seen through the pay slip reviewed for both female and male in clause 6.2.2 and 6.2.3.
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. AUDITORS' GUIDE: 1) Appropriate language is made available – Bahasa Malaysia, English and language understood by all workers or their representative. 2) Workers – local/ foreign/ contractors/ Orang Asli, male & female. 3) Get confirmation from workers that the above	Yes	For the Lavang CU documentation of pay is in the form of monthly pay slips. Conditions of pay are contained in the workers' respective employment contracts. Samples of the monthly pay slips and employment contracts were made available and reviewed during the remote audit. Labour laws, union and/or other collective agreements detailing payments and other conditions, was made available in the languages understood by the workers and explained to them by a management during induction. Each pay slip documents the name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions (statutory such as EPF, SOCSO, EIS), net salary, annual leave and medical leave taken, etc. Samples of payslips for worker (Local and Foreign) were sighted and verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages Order (Amendment) 2020 and Employment Act 1955. For the SOU Lavang documentation of pay is in the form of monthly pay slips. Conditions of pay are contained in the workers' respective employment contracts. Samples of the

Clause	Indicators	Comply Yes/No	Findings
	documentation is made available to them, and they understand the content.	Tes/NO	monthy pay slips and employment contracts were made available and reviewed during the audit. Labour laws, union and/or other collective agreements detailing payments and other conditions, was made available in the languages understood by the workers and explained to them by a management during induction. Each pay slip documents the name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions (statutory such as EPF, SOCSO and nonstatutory such as donation to mosque funds, Temple funds), net salary, annual leave and medical leave taken, etc. Interview with workers reveal that they understand the contents of the pay slips and seeks explanation from the office whenever they needed any clarifications. Samples of payslips were also sighted and verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages Order (Amendment) 2020 and Sarawak Labor Ordinance.
	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,	Yes	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 Malaysia/Indonesia or in dual-language, namely English and the language commonly used in the worker's country of origin.

Clause	Indicators	Comply Yes/No	Findings
	reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members. AUDITORS' GUIDE: 1) To request for the CH to prepare contracts/employment records between recruitment agencies and the employer (HQ). The document is needed during the audit. 2) To review contracts/employment offer letters signed by migrant workers in their respective country at the time of hiring. 3) Contract agreement must be available in the workers national language. 4) If (3) is not available, seek documented evidence that the contract agreement has been explained by the management official via interview with workers, training records etc. 5) Consider several job positions in overtime sampling e.g. harvesters, creche nanny, nursery, bunch grader. 6) Maternity leave shall be applicable to every workers, be it local or foreign female employees.		Among others, the contracts defined the place of work, wages, working hours, medical, accommodation, reasons for dismissal/termination, SOSCO, recruitment free, holiday entitlement, rest day, sick leave, annual leave, maternity leave (for local worker only) workplace transportation, resignation, safety & health, others Labour regulation and compliance, complaint and others term and conditions. For the all workers, there is evidence that the payment of statutory contributions such as EPF (for local worker only), SOCSO and Employment Insurance Scheme (for local worker only), are being made in accordance with the relevant legal provisions. Among the sampled contracts sighted during the audit were as the indicator 6.2.1.
	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	The Lavang CU have implemented same as SDPB to complied with legal requirements and MAPA/NUPW Agreement 2021, Sarawak Labour Ordinance and Minimum Wages Order (Amendment) 2020 on regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. The working hours as per Sarawak Labor Ordinance were, working hours for 8 hours and 0.5 hours break in the between the time. The time for break at the all Estate is 1030-1100am. For overtime, it has been mutually agreed upon between the management and workers and met the legal requirements. Overtime will be offered when there is additional job and no discrimination observed. Permits from the Department of Labour Sarawak were sighted as follows: a. Letter dated 30 July 2015 (issued to Human Resources Manager, Sime Darby Plantations (Sarawak) Sdn. Bhd. (Lavang POM) under Section 105 (7) Labour Ordinance Sarawak for overtime work up to 120 hours per month. There is no evidence that any worker works more than the allowable 120 hours per month. Each pay slip documents the name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions (statutory such as EPF, SOCSO, EIS), net

Clause	Indicators	Comply Yes/No	Findings
			salary, annual leave and medical leave taken, etc. Samples of payslips were sighted and verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages Order (Amendment) 2020 and Sarawak Labour Ordinance:
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure. AUDITORS' GUIDE: 1) Medical care and facilities shall be available for the employees, be it local or foreigners i.e. medical assistance, pregnancy checkup, child delivery through registered medical practitioner and vaccination. 2) HUMANA or Child Learning Centre is available for workers' children who are ineligible to attend government school. 3) Recreational facilities such as children playground, football/futsal field, badminton court, praying facilities etc shows the employer considerations to good living condition for the workers and their families.	Yes	The Lavang CU provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to all workers. Linesite inspection was conducted weekly by the Medical Assistant in Lavang POM and all estates using the Housing Complex/ Nest/ Community Hall Weekly Inspection Checklists. Any issues found during the inspection was remarked in the checklist and action will be taken accordingly. There was a quarterly Housing Unit Inspection (EWR) carried out by the Employees Welfare Committee. During the linesite inspection at Lavang POM, Dulang Estate, Lavang Estate and Chartquest Estate, the cleanliness and up-keeping of the housing compound and workers' house are found satisfactory. For workers with family, each will be given a house while for single workers, it will be given shared house of 2 people per room. For all workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilizes) and FOC for repairing house. Other amenities such as community hall, place of worship sport facilities are provided. Government schools/ CLC are available within or near by the estate complex while crèche is made available in the estate. Seen the Budget for housing repairs, sanitation, garden upkeep and CAPEX & OPEX from all operating units. SDPB has initiated Operational Control Procedure established by Plantation Sustainability and Quality Management (POSQM) dated 26/2/2015. Doc no SD/SDP/PSQM (ESH)/204-OD6. Page 5 of 12, point 6.2 on communicable disease control, 6.2.1, no breeding ground for mosquitoes / flies / rodents. SDPB has also initiated a creche inspection report in accordance with Standard Operating Procedure for Primary Health Care Services in Plantation. Doc No SD/SDP/PSQM(ESH)/202-OH14 Rev 1. Sighted the creche inspection records for the sampled estates and the mill.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	Yes	All the workers were provided with 10kg of rice once every two months as per company's policy. Seen the records of distribution of rice. Interviewed with the workers confirmed that they are easily access to adequate, sufficient and affordable foods where the mill and estate sundry shop. A visit to the estate's sundry shop had confirmed that the price of the daily needs is reasonable considering the size and location of the grocery store.

Clause	Indicators	Comply Yes/No	Findings
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following: • An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. • The unit of certification may choose to implement the "living wage" payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation Until such time where the Malaysian version of "decent living wage" has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.	Yes/No Yes	Based on the suggested method(s) by RSPO guideline, an assessment of the Prevailing Wage was conducted in an RSPO Certified Unit in Lavang CU and the Prevailing Wage was identified as per the benefits below" for Local and Foreign worker. In-kind Benefits

Clause	Indicators	Comply Yes/No	Findings
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	Yes	There are no casual workers hired in Lavang POM and supply bases. All employees are permanent employee (for locals) and contracted employee (for foreign workers). All permanent and fulltime employment or contract workers used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2
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	The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below: We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to: • Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. • Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. SDPB has developed Human Rights Charter where they respect Freedom of Association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, they will provide alternative means of employee engagement and grievance redressal. The policy was communicated via ILO Briefing through the muster briefing to all workers on 03/1/2022 by RCE in Lavang POM, by Assistant Manager on 26/1/2022 in Dulang Estate, by Manager on 29/1/2022 in Chartquest Estate and by Assistant Manager on 25/1/2022 at Lavang Estate. During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join any organizations.
	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	In practice, there was no trade union/workers' union. However, the Lavang CU have implemented and formed a meeting with management representative and worker representative. Recently, Social Dialog was introduced and implemented at Lavang POM, Lavang Estate, Dulang Estate and Chartquest and Estate to comprising POM/estate management and worker representatives who have been elected by the workers themselves as a communication channel between management and workers. The interval meeting was carried out by forthrightly basis. This also been implemented due to impact assessment. Main reason to gather the information such as feedback from the workers in term of Social, Safety, Environmental, Welfare issues, etc. All the feedbacks were highlighted in the minutes meeting and Social Dialog Online Tracker (SDTS) for tracking system and action plan.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected	Yes	Based on the worker's and management interview, the selection of representative workers made from the election among the member without management interference. Foreign workers included in the committee formation and appointment letter sighted at each OU.

Clause	Indicators	Comply Yes/No	Findings
	representatives for all workers including migrant and contract workers.		
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	Yes	The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below: We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to: • Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. • Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. • Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations. • Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities. • Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use. • Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees. • Protecting the Rights of Children: We seek to promote the wellbeing of children and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography.
	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 Lavang CU has employed anyone below the age of 18 years. 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. More evidence that minimum age requirements are met will be verified during onsite audit.
	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 Lavang has employed anyone below the age of 18 years or young persons. Auditor also verify through the contractors in the SOU Lavang 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.

Clause	Indicators	Comply Yes/No	Findings
			The policy protection of children is contained in the Sime Darby Child Protection Policy dated January 2015. There was no evidence that the estates and the mill at SOU Lavang employ anyone below the age of 18 years.
	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. AUDITORS' GUIDE: 1) No child is allowed at workplace. 2) Sampled relevant communication records between the employer, workers and the nursery/creche PICs. 3) Check operating hours of the nursery/rcreche.	Yes	The policy protection of children is contained in the Sime Darby Child Protection Policy dated January 2015. There was no evidence that the estates and the mill at SOU Lavang employ anyone below the age of 18 years.
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. AUDITORS' GUIDE: 1) There must be a policy statement and the communication shall be evident. Interview shall be carried out to confirm understanding and awareness.	Yes	The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below: We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to: • Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims. • Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation. The policy was communicated through the Gender Committee meeting. During the housing inspection, an interview session was conducted, and it was found that the workers were aware on the policy communicated during muster briefing and placed publicly in the notice board at housing area and office. It has also been explained during the induction course for the newly arrived workers.
	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. AUDITORS' GUIDE: 1) There must be a policy statement and the communication shall be evident. Interview shall be carried out to confirm understanding and	Yes	SDPB has established the Human Rights Charter where they respect and uphold reproductive and maternity rights. The Charter is a commitment of the Group Sustainability and Quality Policy Statement. The charter was communicated to mill's workers on 15/08/2022. The policy is also published on notice board within the mill and estate. Interview with mill female staffs and maternity records confirms that there is no reproductive restriction. Training regarding Reproductive Rights Policy has been briefed to all workers on 23/9/2022 for the whole region.

Clause	Indicators	Comply Yes/No	Findings
	awareness. 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	Gender committee is in place as a channel where expecting mothers and new mothers are consulted and advised on actions to be taken including discussion with the management on reassigning them to work that has risk and hazard during their pregnancy and breast-feeding period. Interview with workers and GCC chairperson confirmed that mothers are given the rights to breast feed, seek for rest during work hours (if required) and assigned to task that is not imposed any hazard to them.
	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	Lavang CU has established and implemented the Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where an e-Form, email address and toll-free number / hotline can be found in www.simedarbyplantation.com/corporate/governance/whistleblowing. Furthermore, SDPB had developed the Policy on Protection of Human Rights Defenders (HRDs) where if any 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. Training regarding grievance mechanism has been briefed to all workers on 23/9/2022 (Lavang POM). For Lavang Estate, the briefing was conducted on 15/8/2022. For Chartquest Estate, training has been conducted during morning briefing on 21/8/2022.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty to the workers for termination of employment	Yes	Lavang CU has implemented dedicated passport locker for safe keeping and easily accessible by workers. Interview with workers confirm that they can access to their passport when they required. Review of the payslips and productivity sheets at the estates confirmed that there is no withholding of wages. There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia was same with the employment contract signed between worker and estate/mill. Based on the workers interview, the overtime was given voluntarily if any work offered. The termination of service is clearly stated. Interview with the workers confirmed that there is no forced and trafficked labour in Lavang CU. The terms and conditions offered by the company were similar in their home country and when arrived in the plantations. No contract substitution has occurred, and no involuntary overtime was observed. Sampled of the employment contracts includes the terms and conditions for resignation/ termination of contract is clearly outlined and acknowledged by the workers. Workers who want to terminate the contract shall give between 4 – 8 weeks notices depending on the years of service.

Clause	Indicators	Comply Yes/No			Findir	ngs		
	Debt bondage							
	Withholding of wages							
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented. AUDITORS' GUIDE: 1) To check the policy statement of the labour policy and to confirm the employer commitment and the implementation in safeguarding this policy. 2) To request for "Procedure in Handling Foreign Workers". Check whether the establish procedure is practical and complying to the legal requirements i.e. recruitment process, training, benefits, probation, payment of wages, renewal and management of permit/passport etc. 3) The implementation of the policy and procedure shall be supported with appropriate	Yes	via www.simedarb a. Providing equal b. Respecting free c. Eradicating any d. Ensuring favour e. Enhancing Safe All the local and Besides, they wen The workers info contract substitution	yplantation.co opportunity dom of asso form of explorable working ty and Healt foreign work e provided worked that the on has occurrived the for	com where they ciation potation potations conditions cers will be proviith decent living ney were treate red through inte	vided with ing condition and equally wriewed with	nduction training prior to wo nd free from any discriminati vithout any discrimination. the workers. uitment agency. Each esta	ork. ion. No
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	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	The letter of apport The Managers support the down line import made for all the letter for such an two-way commundates of meeting. Ope. Unit	pointment for absequently elementation estates and appointmen ication with held by the elementation with a 18/03/22 a 30/03/22 a 28/03/22 a 22/03/22	the Managers sassigned duties of ESH practice the mill. All ide to the metal idea identities and the metal idea idea idea idea idea idea idea idea	signed by the sof ESH cores in the estatentified Executed the mill as through the ecorded below 23/09/22 27/09/22 10/09/22 27/9/22	Appointment letter 27/10/2021 & 01/05/2022 18/08/22 & 01/03/22 15/08/2022 27/1/2021	ed. for as a lar
			LPOM	30/03/22	30/06/22	27/9/22	15/8/2022	
			Workers during safety. All units				n mainly on housing and	

Clause	Indicators	Comply Yes/No	Findings
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites.	Yes	The accident and emergency procedures are available in adherence to the SDPB policy on 'The trained personnel for the First Aid were among the employees working in the mill on shift and the estates staff/mandores. The first aid boxes were available at various points in the mill complex including laboratory, office, workshop, process control room etc. Similarly, the estates distributed the first aid box to the mandores and brought along to the field during operations. In addition, there are also first aid boxes kept in the office, store and workshops. Sighted distribution of First Aid Box recorded in Dulang Estate.Lavang estate, Charquest Estate Kelida Estate and Lavang POM. Procedure's guidelines were issued by RSQM and amended to tailor to the situation differences in the estates and mills.
	Records of all accidents are kept and		Emergencies Situation Mill Estate
	periodically reviewed.		1 Fire hazrad / /
	Ferrometry resistant		2 Injury At Site / /
			3 CPO spillage / -
			4 Dieseline spillage / /
			5 Explosion / -
			6 Poisonous animals attack - /
			7 Flood - /
			8 Workers' Strike / /
			9 Electrocution / Electric shock / /
			10 Gas Release/Leaks / -
			11 Explosion Incident / -
			12 Rescueretrieval Worker – Confined Space / -
			ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The training are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training. The trained personnel for the First Aid were among the employees working in the mill on shift and the estates staff/mandores. The first aid boxes were available at various points in the mill complex including laboratory, office, workshop, process control room etc. Similarly, the estates distributed the first aid box to the mandores and brought along to the field during operations. In addition, there are also first aid boxes kept in the office, store and workshops. In addition, the mill had the Document Palm Oil Mills, SDPB Incidents, Accidents and Non-Compliance Management Procedures Doc: UM/HSE/SP/03 Records of all accidents are kept and periodically reviewed and reported monthly in the LTI Monthly Rapid 4 System.
	6.7.3 (C) Workers use appropriate personal	Yes	Training and briefings on the operations were provided for workers to educate them on
	protective equipment (PPE), which is		safe working practices to ensure applicable precautions are adhered. Training for

Clause	Indicators	Comply Yes/No	Findings
	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.		employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, Mill workers, harvesters, pruners, field workers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. Based on the HIRARC carried out at the estates and mill the PPE types for the various activities has been identified and implemented. Monitoring via Personal Protective Equipment Card and verified. Job category
	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. AUDITORS' GUIDE: 1) To ensure that there is no gap in between the period of the renewal of permit and the actual submission of application. It is to confirm that the workers, including foreign are covered by insurance at all times. 6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	Yes	SOU Lavang provides medical care to Group Estate workers with Klinik Ladang established within the premises. The Mill workers are treated at the Clinic at Lavang Estate. Serious cases sent to Bintulu. In addition, all workers are covered by SOCSO, verified through 'Jadual Caruman Bulanan. All sample operating units continued to maintain Accident statistics and periodically reviewed them (quarterly basis) during 'Health and Safety' committee meeting – minutes reviewed. The f accident records were sampled:

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. AUDITORS' GUIDE: 1) To ensure IPM activities are viewed and sampled during the onsite visit. 2) Pay attention to potential pest issues and indicators such as the use of rat baits, bagworm infestation, barn owl and the use of beneficial plants at site.	Yes	Lavang SOU 31 continued to implement Integrated Pest Management (IPM) in all the 4 estates and continue to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Agricultural Reference Manual (ARM) Section 15 -Plant Protection. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. For bagworm control the program includes the planting of beneficial plants such as <i>Cassia cobanensis</i> , <i>Antigonan leptopus and Turnera subulata</i> and for rhinoceros beetles is by using pheromone traps. Lavang SOU 31 did carried out census on rat damage and diseases like Ganoderma. The IPM technique to control rats includes rearing Barn owls (<i>Tyto alba</i>) and rat baiting was by calendar baiting at 2 campaigns per year. Rat baiting would continue until bait acceptance fell below 20%. The procedure referred was in the Agricultural Reference Manual (ARM) Section 15 - Plant Protection. During the audit, it was observed a number of beneficial plants had been planted in order to attract natural predators and thus reducing the use of pesticides and the estates had seedlings in polybags, ready for planting in the Nursery. Records showed that beneficial plants were continuously planted in by the 4 estates visited at the average rate of 5.0m/ha. Empty Fruit Bunch (EFB) was applied in single layers and is not dumped in large amounts to prevent breeding of Rhinoceros Beetles. Barn owls was encouraged, by installing Barn Owls boxes in the fields.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	Yes	 Species referenced in the Global Invasive Species Database and CABI.org. were used in managed areas of the 4 estates. Such as Antigonon species for attract predator to control population of bagworm. The spread of plant was under control of management of estate. Antigonon leptopus (Beneficial Plant) – information on the species' invasiveness specifically in Malaysia is not available on CABI.org and GISD websites Cassia coboanensis (Beneficial Plant) – species is not available on GISD and CABI.org websites Turnera subulata (Beneficial Plant) - species is not available on GISD and CABI.org websites 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	Yes	Lavang SOU 31 continued to use the Sime Darby Plantation Berhad's policy of no open burning ever since Sime Darby Plantation Berhad's practised zero burning as specified in Item 5.3.6 on NO OPEN BURNING/USE OF FIRE sign by Board of Directors dated 17/11/2020. As advocated, the estates practised Zero burning thus no use of fire for pest control. In the 2019, 2020 & 2021 replants visited during the audit in all the estates, it was evident that all palms were felled, shredded, windrowed and left to decompose.

Clause	Indicators	Comply Yes/No	Findings
	authorities.		Furthermore, there had been no serious outbreak of pest attacks in all the Estates.
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 Lavang CU. Selective products and application methods that are specific to the target pest, weed or disease are prioritized. Lavang CU continued to use agrochemicals based on its Agricultural Reference Manual (ARM): 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. The chemical used in the estate captured from the chemical register updated on 21/07 2022
	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 in Lavang SOU 31 had records to show the types of pesticides used with active ingredients and their LD50, where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. 7.2.4 There is no prophylactic	Yes	As part of the IPM plans, the quantity of pesticides required for various field conditions are documented and justified in Sime Darby Plantation Berhad Agriculture Reference Manual (ARM) Section 16. The implementation in the field were consistent with the ARM and the following practices were adopted by the estates; a) Established growth of beneficial plants (<i>Cassia cobanensis, Antigonan leptopus and Tunera subulata</i>) to attract natural predators and reduce use of insecticides. During the site visit the auditor observed notable quantity of beneficial plants been planted at average rate of 5.0m/ha. b) The estates to reduce the use of pesticides to control rats, uses Barn Owls (<i>Tyto alba</i>) is being introduced. c) Where possible, Close Ended Conservation Trenches (CECT) is being carried out in flat areas inorder to control RB. EFB is applied in single areas to prevent breeding of RB. There was no evidence of any prophylactic use of pesticides except in immature and young fields, where

Clause	Indicators	Comply Yes/No	Findings
	use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.		prophylactic spraying using diluted cypermethrin was still practiced for the control of Rhinoceros Beetle as per SOP. a) Lavang SOU 31 estates only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. b) From the review of the chemical register, it was noted that all pesticides used are of class III & class IV. The use of paraguat had been banned in all estates since 2007.
	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	Lavang SOU 31 were committed by not using pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat. The chemical store and chemical list indicated both estates had none of the chemicals. The use of <i>paraquat</i> was banned in all Sime Darby Plantation Berhad's estates since 2007. Most pesticides used were class II, III & class IV. All the 4 estates confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000. a) The review of the chemical register concluded that all pesticides used were of class II, III & class IV. The use of <i>paraquat</i> had been prohibited in all Sime Darby Plantation Berhad's estates since 2007. b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. c) Sighted from records and interviews with workers, staff and estate assistants, concluded that trainings were held with all precautions being taken and all legal requirements The chemical used in the estates were recorded in chemical registers which were updated on 21/07/2022.
	7.2.5a Judgment of the threat and verify why this is a major threat.	Yes	As mentioned above in 7.2.5 of this 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 Estate had only used Class III and Class IV chemicals. Hence, the need for a judgment of the threat and verification as to it being a major threat does not apply in Lavang CU.
	7.2.5b Why there is no other alternative which can be used.	Yes	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. Hence, the need to assess other alternatives is not required.
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Yes	As mentioned above in 7.2.5 of this checklists 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. Hence, the need as to which process was applied to verify why there is no other less hazardous alternative are not required.
	7.2.5d What is the process to limit the negative impacts of the application.	Yes	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. Hence, the need to limit the negative impacts of the application does not arise.
	7.2.5e Estimation of the	Yes	As mentioned above in 7.2.5 of this check list and based on audit findings, there was no evidence of

Clause	Indicators	Comply Yes/No	Findings
	timescale of the application and steps taken to limit application to the specific outbreak.		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. Hence, the need to estimation of the timescale of the application and steps taken to limit application to the specific outbreak does not arise.
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	Yes	 Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the product. a) The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be handled in a safe method. 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. 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. d) Training in relation to pesticides & chemical handling among others as shown under indicator 3.7. 2
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	Yes	The storage of pesticides at Lavang SOU 31 was found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. The chemical and fertilizer stores (with cemented floors and roofing) are locked & handled only by authorized personnel i.e. storekeeper. The stores in estate and mill were ventilated (equipped with exhaust fans). All the chemicals were arranged/segregated according to the type. During site visit in the estates i.e. chemical and fertilizer store, sighted relevant SDS were displayed. Adequate safety signage has been placed at both internal and external of the building. A proper premixing area with eye wash facilities and bathing area is available near to the chemical stores. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. This is to avoid any contamination of chemicals onto the ground. Triple rinsing activities continued to be implemented for empty pesticide containers. The detailed procedure for this purpose is available in SOP for Scheduled Wastes Management and SOP for Triple Rinsing.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Yes	Empty pesticide containers were stored before being disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Empty pesticides containers were triple rinsed, holes punched and stored separately in the SW store. Inventory and consignment documents verified for confirmation of proper management and disposal. Thereafter disposal arrangement will follow accordingly as per procedure in Sustainability Manual procedure SD/SDP/PSQM (ESH)/203-EN1 — Scheduled Wastes (Hazardous Waste). Presently all SW are dispatched to the licensed buyer. No containers being used for other purpose in the estates with the exception that some empty chemical

Indicators	Comply Yes/No	Findings
		containers were recycled for premixing pesticides for onward delivery to field. The containers were disposed as SW409.
7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	Yes	Aerial spraying is not a practice in Lavang SOU 31. There was no evidence to show that such a method being used in the 4 Estates. This was also supported through interviews with executives, field staffs and workers. No such activities being witnessed during the site/field visit.
7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. AUDITORS' GUIDE: 1) Please note that this requirement is mandatory and not depending on the recommendation made by a CHRA assessor.	Yes	Lavang POM LPOM CHRA was conducted on 15/01/2020 Medical Surveillance On Lavang Lavang Palm Oil Mill was conducted on 12/11/2021. Lavang Estate CHRA for Lavang Estate was conducted on 15/01/2020. As per the recommendation from the CHRA assessment, medical surveillance was conducted on yearly basis. The latest surveillance was by conducted on 26/10/2021. The results from the assessments indicated that all the employees were fit to handle the chemical. Dulang Estate CHRA for Dulang Estate was conducted on 16/01/2020. As per the recommendation from the CHRA assessment, medical surveillance was conducted on yearly basis. The latest surveillance was on 02/11/2021. The results from the assessments indicated that all the employees were fit to handle the chemical. Chartquest Estate CHRA for Chartquest Estate was conducted on 16/01/2020. As per the recommendation from the CHRA assessment, medical surveillance was conducted on yearly basis. The latest surveillance was conducted on 11/08/2022. The results from the assessments indicated that all the employees were fit to handle the chemical. Kelida Estate CHRA for Dulang Estate was conducted on 17/01/2020 operator.

Clause	Indicators	Comply Yes/No	Findings
			The latest surveillance was by conducted by on 26/08/2022. The results from the assessments indicated that all the employees were fit to handle the chemical.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	Yes	All estates complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organization whereby no work with pesticides is given to pregnant or breast-feeding women. <i>Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan)</i> . During site visits there was no breastfeeding women and underage of 18 workers involved in chemical applications. All estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	Yes	The organization had established yearly waste management plan with latest updated in January 2022. Among the plan been included and established were: Scheduled waste – Dispose by license contractor Domestic Waste – Disposed by license contractor Recyclable waste – Recycle and collect by contractor Sighted during site visit, all waste identified had been manage accordance to company plan.
manner.	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	Yes	Estate Standard Operating Procedure Scheduled Waste Disposal including empty pesticide containers were carried out as per established procedures. Triple rinsing procedures was continually implemented for empty pesticide containers. The rinsed containers were then pierced and stored prior disposal. Records on usage and disposal were well recorded and documented. It was found that scheduled waste generated at all estates been manage by the operating units. Inventory (5 th schedule) was up-to-date and tally with the physical stock at the storage area. The schedule waste record was updated in the E-Swiss.
			Mill It was found that scheduled waste generated at all estates been manage by the operating units. At the moment mill had posed with special approval letter until 31/12/2022. Handling and management of scheduled waste have been improved and in accordance with company waste management plan and procedure. Hence previous MINOR NCR RMN 01 satisfactory closed.
	7.3.3 The unit of certification does not use open fire for waste disposal.	Yes	During site visit at Lavang SOU units, there were no evidence on waste material has been disposed using fire. All the waste material (domestic & scheduled waste) has been disposed accordingly.
7.4 Practices maintain soil	7.4.1 Good agriculture practices, as contained in SOPs, are followed to	Yes	Lavang SOU 31 continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer recommendations. Maintaining soil fertility is guided by its SOPs in a few chapters:

Clause	Indicators	Comply Yes/No	Findings
fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	manage soil fertility to optimise yield and minimise environmental impacts. AUDITORS' GUIDE: 1) Be observant. 2) To ensure that site sampling includes GAP activities and indicators such as soil erosion, absence of vegetative growth (bare land), nutrient deficiency, upkeep of furrow and watering system, nutrient recycling activities, road condition etc.		a) Agriculture Reference Manual (ARM) dated 01/07/2011, Section 8 - Manuring b) Estate Quality Management System (EQMS) Manual dated 01/11/2008, Chapter B14 - Manuring c) Sustainable Plantation Management System Manual (SPMS), d) "Guidelines On River Management" Manual, ESH Management System Manual dated 01/07/2012, e) Plantations Quality Management System (PQMS) All the estates operations were guided through the manuals and SOPs. The procedures as documented in the Agriculture Reference Manual were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The ARM included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment. Fertilizer application, which was of paramount importance for maintenance of soil fertility, were carried out based on the recommendation made by the Chief Agronomist II from Plant Nutrition & Protection Unit Sarawak Region of Sime Darby Plantation Research Sdn. Bhd. Annual fertilizer recommendations were made based on annual foliar sampling, while soil samplings were carried out on a 5-year cycle basis by Plant Nutrition & Protection Unit Sarawak Region of Sime Darby Plantation Research Sdn. Bhd. The recommendations by the Chief Agronomist II were also available during the inspection and the application of fertilizers had been carried out as recommended and scheduled. Noted from the records that the actual amount of fertilizers applied in 2021 were completed.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	Yes	Periodic tissue/leaf and soil sampling were carried out in Lavang SOU 31 to monitor changes in nutrient status. Annual foliar sampling for the nutrients N, P, K, Mg, Ca & B had been carried out The results of these samplings will form the basis for the fertilizers input recommendation to maintain and improve soil fertility for FY2023. The soil analysis provided the indication of soil health and monitor the changes in the organic carbon and total nitrogen. Soil sampling was carried out on a 5 year cycle basis respectively by Plant Nutrition & Protection Unit Sarawak Region of Sime Darby Plantation Research Sdn. Bhd. For the estates, agronomic assessment and fertiliser recommendation was conducted by Plant Nutrition & Protection Unit Sarawak Region of Sime Darby Plantation Research Sdn. Bhd. to formulate the manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Soil maps were made available and reviewed by the auditors.
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent	Yes	Lavang SOU 31 continued to have a nutrient recycling strategy in place which included stacking of pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field and EFB mulching. For EFB application on the estates, priority was given for application in young mature areas and replants.

Clause	Indicators	Comply Yes/No			F	indings		
	(POME), palm residues and optimal use of inorganic fertilisers.							
	7.4.4 Records of fertiliser inputs are maintained.	Yes	Plant Nutrition and during the annual form. Fertiliser application cards, field cost both from headquarters.	Protection of Soliar sampling on program wasok, manuring Records of pro	Sime Darby Planta s monitored using audits by Planning ograms and applica	nputs as recommended by tion Research Sdn. Bhd we records like manuring me and Monitoring Departmentations of fertilisers were me with recommendations	tho visited all the 4 estated master plan, program shent under Upstream De made available to auditor	neets, bin
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	The Soil maps are prepared in January 2011 by Sime Darby Plantation Berhad Research and Advisory De (Precision Agriculture Unit). During the field visit and the soil maps provided and reviewed by the auditors it was observed that no fragile marginal soils were found in Lavang SOU 31. The soil series were as follows:					
				Lavang	Dulang	Chartquest	Kelida	
			1	Bedup	Bedup	Bedup	Bedup	
			2	Bekenu	Bekenu	Semarak	Bekenu	
			3	Derawan	Bukit Tuku	Melugu	Derawan	
			4	Karap	Derawan	Derawan	Nyalau	
			5	Kaya	Gong Chenak	Bekenu	Derawan	
			6	Liku	Melugu	G Chenak	Semarak	
			7	Medang	Nyalau		Kuah	
			8	Ruai	Semarak			
			9	Stass				
	7.5.2 No replanting on steep slopes (above 25 degress) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	Yes	degradation of soils Slope & R Buffer Zor Land Prep It was observed that than 25 Ha within t	s. The plantings tiver Protection he & 25 degree paration for Ter at no replanting he SOU.	s on slopes between Policy slope and in item racing in ARM Mar g of any individual,		guided by: terrain (greater than 25 gradation of soils were	5°) larger

Clause	Indicators	Comply Yes/No	Findings
			road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in some mature areas. The cover crop <i>Mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>Nephrolepis biserrata</i> in the inter rows were sighted during the visit.
	7.5.3 There is no new planting of oil palm on steep terrain.	Yes	Lavang SOU 31 had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. It was observed that there is no new planting of oil palm on steep terrain.
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and 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. AUDITORS' GUIDE: 1) To ensure that site sampling includes various land topography from low land to very steep land.	Yes	Lavang SOU 31 had a management strategy for palm oil cultivation,taking into account the soil maps and surveys identifying marginal and fragile soils, including steep terrain for the palm oil long term suitability. The soil maps prepared in January 2011 by the Precision Agriculture Unit of Sime Darby Plantation Research Sdn.Bhd. were provided and reviewed by the auditors and it was observed that no fragile or marginal soils were found in all estates in Lavang SOU 31.
	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	Soils maps prepared in Jan 2011 by the Precision Agriculture Unit of Sime Darby Research Sdn.Bhd. shows that there are no fragile soils in all Estates During the field visit and the soil maps provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in Lavang SOU 31.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Yes	The management of all Estates in Lavang SOU 31 continued to use Soil surveys and topographic information guide in the planning of drainage and irrigation systems, roads and other infrastructure. Soils maps prepared in January 2011 and Slope maps prepared on 19 April 2018 Precision Agriculture Unit of Sime Darby Plantation Research Sdn. Bhd. were used. On all Estates, Slope Maps prepared by R&D – Precision Agriculture Unit (VS) dated 19 April 2018 were available.
7.7 No new planting on peat, regardless of	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new	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 Lavang CU.

Clause	Indicators	Comply Yes/No	Findings
depth after 15 November 2018 and all peatlands are managed responsibly.	development areas. 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	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 Lavang CU.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	Yes	Lavang Estate continued to monitor, document and minimise Subsidence of peat areas. The monitoring of peat soil subsidence was guided by the following. a) Item 2 – Optimal Water Levels for Coastal/Peat Soil and b) Item 4 – Water-table monitoring of Chapter 10 of Sime Darby Agricultural Reference Manual – Water Management in Coastal and Peat Plantings. c) Guidance in the "Peat Subsidence Gauge Installation SOP" dated 14/03/2016. Lavang estate monitored water levels using 10 numbers of water level markers in drains and 17 water tubes for ground water levels. Maps, records of water level readings in drains and water tubes and subsidence readings were verified.
	7.7.4 (C) A documented water and ground cover management programme is in place.	Yes	The water and ground cover management program were guided by Section 10 - Water Management in Coastal and Peat lands, in the Sime Darby Agricultural Reference Manual issue2 dated June 2021.
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting.	Yes	Records showed that a Pilot Trial on "Peat Drainability Assessment for Sarawak" had been conducted between May 2017 to May 2018 and report was published in October 2018. The assessment covered Belian, Lavang Special, Lavang, Rasan, Dulang, Pekaka and Ruai Estates of SOU 31 & 34 which was of about 4,500Ha. The entire area had been classified into 3 Basins. 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.

Clause	Indicators	Comply Yes/No			Findings							
	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,		According to Siong 2004, "Drainability is defined as the technical feasibility of sustainable drainage by gravity the excess water from the basin peat swamps". This definition was supported by Melling et al 2007, whereby "sustainable drainability in peat soil area, can only be achieved if the mineral subsoil level is above the mean water level at the drainage discharge point." drainability has been classified as follows:									
	or two cycles, whichever is greater, before reaching the		Class 1	Status Good	Remark Excess water in the field can be drained by gravity even							
	natural gravity drainability limit for peat. When oil palm is phased out, it ii is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.	natural gravity drainability limit for peat. When oil palm is phased out, it ii is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment								2	Moderately Good	during the highest tide and/or during the wet periods. Excess water in the field can be drained by gravity >50% of the tidal cycle, sometimes with the help of bunds and flapgates and/or where water in the plantation can be drained during the wet period before the oil palms start to suffer.
			3	Poor	Excess water in the field can be drained by gravity <50% of the tidal cycle and/or where water in the plantation cannot sufficiently be drained during the wet period; oil palms start to buffer.							
	(5 years: 2019 to 2025) arrangement stated in the Drainability Assessment		4	Very Poor	Excess water in the field cannot be drained by gravity even at lowest tide and/or where water in the plantation cannot sufficiently be drained during the wet period; oil palms start to die.							
	Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. 7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	Based on the above classification, on SOU 31 & 34, Basin 1 & Basin 2 are classified as Class is classified ranging between Class 1 and Class2. Based on this report all peat areas in SC can be replanted. During this audit there was another trail/survey was made by STROPI State Government 17/11/21 for Lavang, Rasan and Belian Estates. Report and outcome have yet to be produced There were no other fragile soils other than peat soils as mentioned under indicator 4.3.1. The strategy in place for peat soil was guided by. a) Item 2 – Optimal Water Levels for Coastal/Peat Soil and b) Item 4 – Water-table monitoring of Section 10 of Sime Darby Agricultural Reference Management in Coastal and Peat Plantings. c) Guidance in the "Peat Subsidence Gauge Installation SOP" dated 14/03/2016. Lavang Estate continued to monitor, document, and minimize Subsidence of peat areas. To										
			a) Item 2 – b) Item 4 - Mana	Optimal Water - Water-table r gement in Coas	ided by the following. Levels for Coastal/Peat Soil and monitoring of Section 10 of Sime Darby Agricultural Reference Manual – Water stal and Peat Plantings. Subsidence Gauge Installation SOP" dated 14/03/2016.							

Clause	Indicators	Comply Yes/No	Findings
			The estates monitored water levels using water level markers in drains and water tubes for ground water levels. Lavang estate monitored water levels using 10 numbers of water level markers in drains and 17 water tubes for ground water levels. Maps, records of water level readings in drains and water tubes and subsidence readings were verified. Thus, the closure of Major NCR STK 01 2021 is verified and effectively closed. Dulang Estate continued to manage peat area with proper facilities and equipment such as water weirs, water table, piezometer and subsidence pole. All of these facilities were regularly monitored and reported to the estate manager on monthly basis. The monitoring reports are in place and has been verified by auditor.
	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	The areas of unplanted peatlands, are continued to be protected.
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	Yes	Water management plan at all the sampled mill and estates were in place and implemented as verified through records of Water Management Plan FY 2022. Generally, the plan was established to focus on minimizing waste and pollution prevention of water sources. Among the action plans are rainwater harvesting, monitoring of pipeline leakage, and establishment of buffer zones at rivers and other water bodies. Workers of all the sampled estates have adequate access to clean water which were supplied through water treatment plant.

Clause	Indicators	Comply Yes/No					Findings		
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Yes	been cor Verified monitorii Lavang Result of Based of	tinued availability of notude in the Environ the latest EMR Rang points. OM Upstream and D	nmental Monit eport, water o ownstream la r quality shov	toring I quality test co	Report (EMR) we monitoring is a conducted on 16	as conducted generally with	other users in the catchment has by ESI Sampling Sdn. Bhd. nin Class IIB of NWQSM at all 22 by ESI Laboratory Sdn Bhd. I. Furthermore, Lavang Mill are
	7.8.1b Workers have adequate access to clean water.	Yes	basis. D analysis Sampling (end of the Sighted, except	rinking water quality were showed all the g Point: Raw Wate iser). result of analysis	has been mode parameters or (before treats) that parameters or the parameters of the	onitore within t tment) aramet dresse	d by Sime Darb the limits. The w , Buffer Tank (a ers were not co	y Plantation Rater analysis vafter treatmen	npling was carried out by monthly Research Sdn. Bhd. Results from verified. It) and Staff/Worker House Pipe he water sample for all estates gement plan and pending the
	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	No The Estates continued to protect the water courses, including maintaining and restoring appropria buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain by restricting agrochemical application and left undeveloped during replanting. Water courses and are protected including maintaining and restoring appropriate riparian buffer zones. The guide detailed in the River Reserve Management (Management of River Reserve in Sime Darby Planta April 2014). The buffer zones established are as follows:					SDP policy to maintain the buffering. Water courses and wetlands lifter zones. The guidelines are		
	for the management and rehabilitation of riparian		No	River width	Buffer zone	No	River width	Buffer zone	
	reserves' (April 2017).		1	> 40 meters	50 meters	4	5 - 10 meters	10 meters	
			3	20 - 40 meters 10 - 20	40 meters 20 meters	5	< 5 meters	5 meters	
			activities fertilizer Among (a)	. Water samples fr	om the intake the water cou plan taken: at buffer/HCV	point irses. I	are taken for p Extracted record	hosphate and	arising from the mill and estates I nitrate analysis for detection of states with details below.

Clause	Indicators	Comply Yes/No	Findings
	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	Yes	c) Track, measure and report all activities around river Train and educate workers However, it was found that During site inspection at Dulang Estate Field 2021 D sighted chemical spraying activities was carried out close to the water edge at the artificial drainage and waterways that directly channel to riparian reserve. This practice was not in line with RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). Thus, Major NCR MZK 01 2022 has been raised. Mill had treated their POME and sample monitoring submitted to DOE via "Laporan Suku Tahun" and details result for BOD as per below was found to be within the limit. Suku Tahun Date submission 1st 21/4/2022 2nd 15/7/2022
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	monitored. 7.8.4 Mill water use per tonne of FFB is monitored and recorded. 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	Lavang POM had monitored their water usage and recorded as per table below: Water Usage 2021 2022 1.57 liter/Mt The organization had maintained and established Fossil Fuel Reduction Plan with latest updated in May 2022. Among the strategies been plan and executed by the operating units were: 1.Scheduled maintenance for machineries and vehicles. 2.Awareness to employee on reduce fuel usage 3.Ensure nozzle is always locked to avoid unauthorized diesel filling Monitoring of diesel consumption been done by the operating unit and as per table below:
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and	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.	NO	Data verification as part of audit assessment for Mill SOU 31 Lavang POM 2021 received date 4/10/2022, information on total hectarage, planted on peat, mill fuel and POME were not accurately input inside the PalmGHGHence Major NCR RMN 1 had been raised.
monitored and new developments are designed to minimise GHG	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result	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 Lavang CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.

Clause	Indicators	Comply Yes/No			Findings					
emissions.	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).									
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	Yes	emissions. Fertilizer, N place.	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, Fertilizer, N ₂ O from fertilizer, Fuel Consumption, Peat Oxidation. Plans to reduce or minimise them are in place. Among others the significant environmental receptors for the estates and mill operations were:						
			No	Environmental Receptors	Source					
			1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).					
			2	Water	Water discharges – Cleaning water/run- off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down					
			3	Land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.					
			acceptable audit team h a) Sci b) Do	limit. The mill was als has verified the condition heduled wastes – were mestic wastes are dis	ed boiler stack sampling for each of the boiler stack. Results were within the co equipped with a Continuous Emission Monitoring System (CEMS). The contractor of the CEMS during the audit. Other action taken by CU were: disposed through DOE contractor. posed at respective estates landfill twice/thrice weekly at designated area complexes and waterways. urning practices.					
7.11 Fire is not used for preparing land and is prevented	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	Yes								

Clause	Indicators	Comply Yes/No	Findings
in the managed area.			There was no evidence to show that fire had been used for preparing land for replanting. In the 2020, 2021 & 2022 areas. during the audit in the estate, it was evident that all palms were felled, shredded, windrowed and left to decompose.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	Yes	This is established in the ERP procedure <i>Kertas Kerja Program Simulasi Kebakaran</i> dated 12/09/2021. Therein containing a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill The procedure was formalised by RGSM for use in all operating units in SDP Estates and mills. Training related to fire drill are conducted annually.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Yes	Both the estates and the mill in SOU Lavang held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure <i>Kertas Kerja Program Simulasi Kebakaran</i> dated 12/9/2021 and Fire Prevention and Control Measure. Therein containing a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill All stakeholders being briefed in the respective stakeholders' meetings: Whole SOU 31 Lavang & SOU 34 Pekaka conducted on 29/09/2022, on 1/09/2022 at Lavang Estate and on 1/1/2022 on Kelida Estate Trainings carted out for Sou 31 & SOU34 on 9/09/2022 on RSPO/MSPO/ILO/ERP/ Fire Drill/First aid.
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	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 SOU Lavang since Nov 2005.
managed area	7.12.2 (C) HCVs, HCS	Yes	SOU Lavang Pekaka has reviewed their HCV with new assessment conducted on June 2017. The new HCV

Clause	Indicators	Comply Yes/No	Findings
are identified and protected or enhanced.	forests and other conservation areas are identified as follows:		assessment titled 'HCV Assessment for Sarawak Zone, which included both the planted area and relevant wider landscape-level considerations with villages and forest reserved. Based on the HCV assessment report, there is only HCV 4 declare in SOU Lavang Pekaka as below:
	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	The total area of HCV area for SOU Lavang Pekaka is 354.07 ha HCV area.
	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 landscapelevel 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 requirements. The integrated	Yes	The SOU has established and reviewed the action plan and monitoring programme for HCVs area after consultation with relevant stakeholders. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action. There were no major changes to the integrated management plan, except awareness training, continuous monitoring for HCVs area. SDPB also has established an SOP for Human – Wildlife Conflict (HWC) Mitigation in Plantation for continuous improvement on conservation & biodiversity. Based on this SOP, most common/identified human-wildlife conflicts are Asian elephant, wild boar, long-tailed macaque, pig-tailed macaque, snake, crocodile and bat. No RTE species found in the SOU Lavang. However, the SOU still maintain the plan for HCV area titled 'HCV Management Plan FY2022' and update of HCV Plan collaboration with UPM, Forest department Sarawak, Sarawak Forest corporation, Nestle detailing plan for Planting the tree, Conservation of Forest, Peat rehab, and Crocodile conservation and it was reviewed with participation of stakeholders during stakeholders meeting September /2022. The appropriate measures to maintain and/or enhance them were implemented through an

Clause	Indicators	Comply Yes/No	Findings
	management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).		action plan. The visited estates have maintained its HCVs.
	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	Auditors has verified through checking through <u>www.globalforestwatch.com</u> , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no new land clearing in existing plantations or new plantings at the SOU Lavang Pekaka after 15 November 2015.
	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	Yes	Although there was no RTE species found in the CU, Sime Darby 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.
	workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and		SOU Lavang Pekaka management will notify the relevant authorities immediately if any individual working for the company is found to capture, harm, collect or kill these species.

Clause	Indicators	Comply Yes/No	Findings	
	national law if any individual			
	working for the company is			
	found to capture, harm,			
	collect, trade, possess or kill			
	these species.			
	7.12.7 The status of HCVs,	Yes	Progress of implementation of the action plans 'HCV Action Plan (continuous) for FY: 2022 for All Estates	
	HCS forests after 15		were reviewed and verified on the ground. No RTE species were found within the estates area.	
	November 2018, other			
	natural ecosystems, peatland			
	conservation areas and RTE			
	species is monitored.		Noted the CU had continued to implement planned actions such as awareness to the staffs and public on	
	Outcomes of this monitoring		enhancing biodiversity, posting of relevant information in the Sime Darby webpage and erection of signage at	
	are fed back into the		strategically locations.	
	management plan.		onategically resultance	
	AUDITORS' GUIDE:			
	Reviewing HCV Management Plan			
	a) Review the plan.			
	b) Review the appropriateness of			
	the action taken identified to			
	address the issue in the plan. c) Look into the monitoring of the			
	action taken and the			
	effectiveness of the			
	implementation of the action			
	plan.			
	d) Update the management plan in accordance with the			
	monitoring and implementation			
	evaluation outcome.			
	e) Provided overall conclusion for			
	the management plan			
	established by the CH.		And the second of the second o	
	7.12.8 (C) Where there has	Yes	Auditors has verified through checking through <u>www.globalforestwatch.com</u> , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no new land clearing in	
	been land clearing without		existing plantations or new plantings at the SOU Lavang Pekaka after 15 November 2015.	
	prior HCV assessment since			
	November 2005, or without			
	prior HCV-HCSA assessment			
	since 15 November 2018, the			
	Remediation and			
	Compensation Procedure			

Clause	Indicators	Comply Yes/No	Findings
	(RaCP)		
	applies.		
AUDITORS' GUIDE	IN REPORTING ORANG ASLI MAT	TERS (if app	licable) – FOR NON-COMPLIANCES, TO RAISE AT SPECIFIC INDICATORS IN THE MYNI CHECKLIST.
No specific	To include details on Orang		Not applicable since there is no orang Asli affected in this Assessment.
clause –	Asli 1.To report the name of their		
Information	kampung and placement		
related to Orang	(penempatan). No. of the		
Asli / Indigenous	residents of Orang Asli.		
People:	2.Where they are located		
	(radius within 5km from the		
	CU). Check the estate map and		
	estate boundary on		
	neighboring Orang Asli villages.		
	3. Verify the stakeholders list		
	on neighboring Orang Asli		
	community with the CU.		
	4.Read the SIA or SEIA and		
	HCV or HCV-HCSA reports if		
	these assessments had identified potential Orang Asli		
	village(s) that may be affected		
	by the CU operation. If yes,		
	what the issues and		
	recommended mitigation		
	action.		
	5. Verify if any of estate activities may affected the		
	Orang Asli through		
	consultation with auditor. Get		
	the information from head of		
	village (local & Orang Asli)		
	how they started the village		
	(origin, nomad, or separation		
	from other orang asli village), their daily needs, roaming		
	area, sacred area, grave, food		
	source, supply of clean water,		
	where they work, and		
	education for their children.		
	6.Evidence of FPIC had been		
	implemented by the CU and consent given by the Orang		
	Asli communities.		
	7.What are the CSR from the		

Clause	Indicators	Comply Yes/No	Findings
	CU to Orang Asli. Significant CSR for long term development for Orang Asli? Any specific request/needs from Orang Asli from the CU? 8.Consult DFO of Forestry Department and PERHILITAN for any issues related to the Orang Asli. 9.Provide the specific names of Orang Asli representatives sampled during every audit.		
	Common social issues on Orang Asli 1.Accessibility for Orang Asli from their village to the estate and/or roaming area. 2.Protection of cemetery of Orang Asli which located within the estate. 3.Opportunity for employment – male & female. 4.Do they understand the employment procedures and agreement? 5.Are their employment contract complying with the RSPO P&C MYNI 2019? 6.Did they receive appropriate trainings & briefings and other necessities (PPE) to work as other local/foreign workers? 7.Replanting activity that may affected the Orang Asli community. 8.Accessibility for clean water from nearby river or water scarcity. 9.Hunting of wild boar/monkey/fish/birds within estate area or at the estate boundary. 10.Education for the Orang		Not applicable since there is no orang Asli affected in this Assessment.

Clause	Indicators	Comply Yes/No	Findings
	Asli children.		
	What CU needs to do to		Net applicable since there is no even a Asli effected in this Assessment
	address the issues		Not applicable since there is no orang Asli affected in this Assessment.
	1.FPIC with the affected Orang		
	Asli communities on the estate		
	operation.		
	2.Annual external stakeholder		
	consultation with Orang Asli representative.		
	3.Stakeholder consultation		
	with the community had been		
	conducted during initial SIA		
	assessment.		
	4.Review social action plan with participatory of affected		
	Orang Asli.		
	5.Brief and circulate		
	grievances/ disputes		
	mechanism/procedure.		
	6.To offer job opportunity to		
	Orang Asli – male & female. 7.Protection of Orang Asli		
	sacred area or grave.		
	8.CSR to Orang Asli - grass		
	cutting, LF collection, nursery,		

Clause	Indicators	Comply Yes/No	Findings
	road/bridge maintenance, food		
	donation, transport services		
	for Orang Asli children to go to		
	school, etc.		

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

Clause	Indicators	Comply Yes/No Findings	
Time-bound plan A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.	(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.	Yes Sime Darby Plantation (SDP) membership is before 2018 and tir plan maximum up to 30th June 2023. As at January 2022, no de TBP and approval by RSPO Secretarial are not required. progressively undergoing the RSPO Certification process towa RSPO certification of estates/mills. Currently, only Indonesia yet to be certified. Indonesia Operations – as of January 2022 PT Bahari Gembira Ria Sime Darby Plantation does not have management control plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has becertified. And all KUD is planned to undergo RSPO Certification as reported in the timebound plan. Socialisation with the entir currently ongoing. Land Use Change Analysis has been complasma BGR. Refer to RSPO Certificate & Report for PT BGR-https://rspo.secure.force.com/membership/servlet/servlet.FileDoetURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00010ioYJEAZ PT Sandika Natapalma Only Karya Palma Estate yet to be certified - Pending confirmated Badan Pertanahan National (BPN) on Hak Guna Usah. Document. PT Budidaya Agro Lestari Only Beturus (PT BAL) Estate yet to be certified – HGU obtain. May 2018. However never been released by BPN. PT Guthrie Pecconina Sg Jernih Estate and KKPA was separated in 2022 and separately. 890.98 Ha – still under Land legalisation process and Kadastral. PT Sime Indo Agro Only East Estate/Sei Mawang Estate yet to be certified legalisation process for East Estate for 5,815.64 ha is still in process.	eviation of SDP is rds 100% operation over the en RSPO by 2020 re KUD is pleted for whole

		PT Bina Sains Cemerlang Sungai Pinang Estate & Bukit Pinang Estate yet to be certified – Land legalisation process for 308.35 ha is still in process. Liberia Operations – as of January 2020 As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI). http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations New Britain Palm Oil (NBPOL) Operations – as of March 2021 Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd. Last Certified on 27 March 2020. There is total area for NPP: 710.30 ha which is currently excluded from the certification scope until the NPP is approved.
(b) Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	Yes	There are six (6) CU in Indonesia Operations highlighted in the time-bound plan and the certification progress consistent with that in the time-bound plan. The progress details as provided in the TBP in Attachment 6. The Sustainability Section team have conducted the periodic internal audit accordingly.
(c) Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	Yes	Sime Darby Plantation (SDP) membership is before 2018 and time bound plan maximum up to 30th June 2023. As at January 2022, no deviation of TBP and approval by RSPO Secretarial are not required. SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Currently, only Indonesia operation yet to be certified.

	(d)	Where there are isolated lapses in implementation of a time-bound plan, a minor non- compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.	Yes	The details of the Time Bound Plan described as per attachment 6. SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP. As of this audit and Verification of documents and Timebound Plan there are no isolated lapses and fundamental failure to proceed with implementation of the plan in implementation of a time-bound plan
5.5.3 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 1st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	Yes	Verification through www.globalforestwatch.com , GOOGLE maps data, estates maps and through HCV assessment report, and planting profile evidenced that there was no new planting and no new development of area observed. Support also with internal and external audit (ISPO certified) there was no replacement of primary forest or HCV areas in the uncertified management unit. Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;	Yes	No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as both sites was disposed. The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancies between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of 14/07/2021, 10 LUCAs were approved with 0 conservation liability and remaining 9 are still pending from RSPO.
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	Yes	Based on the internal audit report, there were no labour dispute that were not being resolved yet through an agreed process for all uncertified units for all 6 uncertified units of Sime Darby Plantation Sdn Bhd - Indonesia as at January 2022.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	Yes	Sime Darby Plantation maintain corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.

(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of	Yes
	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;	
	Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.	
	Desktop study e.g. web check on relevant complaints	
	If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any noncompliance with the requirements.	
(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively	

The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue are mainly awaiting for Land Titles. The last audit was conducted between July 2020 and August 2021. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.

No critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.

Respective sites-maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company.

	(g)	addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available. 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.					
5.6.6 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.		No additional indicators AUDITORS' GUIDE: 1. Identify (and document) the identification of the previous users and owners of the land; 2. Identify (i.e., locate a written copy of) the agreements/promises made at the time of the relevant land transfers and/or land use agreements; 3. Determine whether the previous users/owners can now be contacted, and do so, as applicable; 4. Interview the previous owners/users to assess whether the land transfer and land use agreements were entered into with their free, prior, informed consent; 5. Evaluate whether there is ongoing compliance with the agreements (e.g., if promises were made at the original transfer date, to transfer developed land	Yes	Estate has be name of Similand through premium and was no such indigenous previdence of was verified Estates, the Golden Hope after mergin Golden Hope Sarawak Goof the land the surveys	een verified, for the Darby Plantation Lands and Survey Land fee. Base case concerning the SOI legal ownership during this audit land was previous Plantations (Soig with Sime Date Plantations (Soig with Soig wit	4.4.1 of this checklist, the La all estates. The Land Title won Bhd. Each estate had legeys Department following the don this, it has been confing the rights of local commund. of the land including history for Lavang Dulang, Charbus owned by Wangsa Mularawak) Sdn Bhd. Thereaft arby in 2007. Wangsa Mularawak) Sdn Bhd. Thereaft arby in 2007. Wangsa Mularawak) Sdn Bhd has bound December 1985. Each estarship signed by the Superirying the payment of premiting others as shown below:	vas under the gal use of the ne payment of med that there nities or or or of land tenure tquest and Kelida upur Sdn Bhd and er to Sime Darby jur Sdn Bhd and ght the land from ate had legal use ntendent of Lands
The CB shall have a mechanism in		back to communities at a later date, were these promises kept in full?):		Estate	Area (Ha)	Ownership/Country lease	Period
place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.		6. Identify and follow up any disputes.		Pekaka Ruai/Dula ng Paroh	(4,707.4) 2673.18/804.3 6 988.00/288.90	04-LCPLC-030-036-00003	Until 17 Dec 2045
The CB shall keep track which party that has been interviewed in				Paroh Estate Ruai/Dula ng	(5555.6) 2,339.00/1,656 .60 1,560.00	04-LCPLC-030-036-00005	Until 17 Dec 2045
the previous audits to ensure proper coverage of the parties				Lavang Sp	(5907.00) 1,178.29	09-LCLS-037-002-00012	Until 6 Jan 2055
throughout the certification cycle.				Chartquest	(13,200) 1,448.71	Provisional Lease of Crown Land, Code Number 304//33	Until 17 Dec 2045

		Lavang and Belian	(5907) (110.10	09-LCLS-037-002-00012 (Lot 12) 09-LCLS-037-002-00011 (Lot 11)	Until 6 Jan 2055 Until 6 Jan 2055
		Kelida and Rasan	(5810) 2460	09-LCLS-040-001-00002	Until 6 Jan 2055
		Rasan	104	04-LCLS-030-035-00027	31 October 2000 – 30 October 2060

ATTACHMENT 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
7.10.1 RMN 01 2022	Major	Finding: Data for GHG emissions were not accurately identified Objective evidence: Based on data verification as part of audit assessment for Mill SOU 31 Lavang POM 2021 received date 4/10/2022, information on total hectarage, planted on peat, mill fuel and POME were not accurately input inside the PalmGHG.	The issue: Information on total hectarage, planted on peat, mill fuel and POME were not accurately input inside the PalmGHG. The root cause: Lack of understanding and training to key in information into PalmGHG system by person in charge. Correction: (The correction shall address the objective evidence) HQ to immediately rectify the issue by furnishing the correct information into PalmGHG system. Corrective action: (The corrective action shall address the root cause of this NC) To train person in charge in SRR on PalmGHG system.	Submission by person in charge thru PalmGHG on 27/12/2022 verified on the same date. Input was found reliable and accurate. Verified training attendant for person in charge for GHG dated 23/12/2022 including training materials and found relevant with GHG information. Status: Closed.
7.8.2 MZK 01 2022	Major	Finding: 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). Objective evidence: During site inspection at Dulang Estate Field 2021 D sighted chemical spraying activities was carried out close to the water edge at the artificial drainage and waterways that directly channel to riparian reserve. This practice was not in line with RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	The issue: Chemical spraying activities was carried out close to the water edge at the artificial drainage and waterways that directly channel to riparian reserve. The root cause: 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 repainted. 3. Lack of on-site chemical spraying training conducted to the sprayers gang Correction: (The correction shall address the objective evidence)	Photos erect of signages at selected areas sighted. Training attendant completed with training evaluation form for sprayer on the restriction of spray at buffer zone dated 13/10/2022 sighted and verified. Status: Closed

			 Management to repaint the faded demarcation of buffer zone. To conduct on-site chemical spraying training and evaluation to the sprayers gang. Corrective action: (<i>The corrective action shall address the root cause of this NC</i>) 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. To conduct on-site chemical spraying training and evaluation to the sprayers gang more frequently in smaller groups. To monitor the effectiveness of buffer zone signage and demarcation. 	
1.1.2 RMN 02 2022	Minor	Finding: Not all related information was accessible during the audit. Objective evidence: Sighted during site visit at: a. 2 units in operation sand filter (UPV) regulatory documented information transfer from Pekaka Mill to Dulang Estate were not retrievable during the audit. b. 2 units air compressor at Lavang POM (Belt Press Station and Boiler Station) regulatory documented information transfer from Pekaka Mill (Boiler Station) and contractor (Belt Press Station) were not retrievable during the audit.	The issue: Related information was not retrievable during the audit. The root cause: No proper handover of documentation from Pekaka Mill management to Dulang Estate and Lavang Mill. Correction: (The correction shall address the objective evidence) To immediately cease the operation of machineries stated in objective evidence. Corrective action: (The corrective action shall address the root cause of this NC) To engage with authority to obtain proper legal documentation.	Sighted the mill had stop work the highlighted machineries and letter application for exemption with DOE (letter date 7/10/2022) sighted. The progress of these machineries will be verified in next audit. Status: Open

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
3.3.2 MAR 01 2021	Minor	Finding: 1. The mechanism to check consistent implementation of procedures (Operational Control Procedure – Worker's Minimum Standards of Housing and Social Amenities) which was established on 26/2/2015 was not in place. 2. The mechanism for ensuring the washing facilities compliance by chemical handlers was ineffective. 3. Mechanism to check consistence implementation on PPE stock was not in place Objective evidence: Based on site visit at the following sites, there were found that: 1At Lavang Estate found breeding ground for mosquitoes at behind of the housing area, which was not covered well. At Paroh Estate – drain was not well maintained at certain block of the quarters resulted some obstruction and stagnant water. 2. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. On audit date 08/12/21 Pekaka Estate - washing facilities at the estate are stored with store items/hardware items thus unable to support fact that the facilities being used by chemical handlers for washing and changing of attire upon work completion. 3. Paroh Estate – According to the workers and management, sometime the shoes were not in stock, so that they need to buy themselves.	Root cause: Reporting of PIOA on linesite checks was not effectively done. Understanding on how to escalate issues was poor. Corrective Action: 1) Gotong royong perumahan 2) To clear clogged drains 3. To revive the washing facilities for chemical handlers 4)Provide training to PIOA and staff incharge & chemical handlers	All sampled estate and mill line site have been visited, found no breeding ground for mosquitoes at housing areas, drainage was well maintained, and PPE provided free of charge. Thus, previous NCR was satisfactorily closed.
3.4.2 DA 01 2021	Minor	Finding: The Social Assessment Action Plans FY2021 for all operating units within Lavang CU were not fully developed with participation of affected stakeholders. Objective evidence: The social assessment action plans FY2021 for Lavang CU were not reviewed and updated regularly, causing the following social issues faced by the	Root cause: The social impact assessments were done in many levels and there was no specific platform to monitor both positive and negative action plans for the OUs. Corrective Action:	Social action plan has been reviewed with certain action has been taken. Previous highlighted issues been included for each CU i.e Lavang POM, Chartquest Estate, Pekaka complex and Paroh Estate has been noted in their SIA action plan on

		issues were not participatory as Lavang POM 1.The salary through bank a workers to withdraw the money Chartquest Estate 1.Limitation estate transportat children from estate to CLC at F 2.The salary through bank a workers to withdraw the money Paroh Estate	and the transportation for the at nearest town. ion for workers to send their Pekaka Complex. and the transportation for the at nearest town and the transportation for the	To include all issues highlighted by the workers representatives into the Social Dialogue Action Tracker To establish Social Dialogue with elected workers representatives to collate issues regarding workers' safety, health and welfare.	issues has been brought up. Therefore, previous NCR was satisfactorily closed.			
3.8.7 RAR 01 2021	Major	overproduction of certified tonnal Objective evidence:	duction of certified volume was	Root cause: The 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. The budget OER for estimated CSPO & CSPK Sighted application on vol extension to RSPO and approved on 22/12/2021. Sighted application on vol extension to RSPO and approved on 22/12/2021. Status: closed				
		Period: October 2019	until November 2021	calculation was also low resulting to low				
		Certified Volume	Actual Produce	total estimated volume for CSPO/CSPK.				
		CSPO: 106,534.23 mt	CSPO: 115,784.484 mt	Corrective Action:				
		CSPK: 26,397.13 mt	CSPK: 30,342.556 mt	monthly monitoring of over processing of				
				FFB through real time basis in the mass balance accounting system				
6.7.3 STK 02 2021	Major Finding: Some workers were observed not using the appropriate PPE as per SDPB Prosedur Operasi Standard, Operasi Ladang Kelapa Sawit dated 01/11/2021 and UM/HSE/OCP/03 dated 09/03/2021.		Root cause: There was no PPE inspection done prior to commencement of work by the staff/mandore in-charge. This indicates lack of awareness among the employees to safety & health at the estates	Sighted an evidence Safety briefing to all the harvesting related workers and general workers during morning muster. Executives, Supervisors and Mandores to ensure workers				
		Objective evidence: During the audit it was observed that on: •Lavang Estate: Harvester in Field 2016G was without safety helmet and rubber boots and tractor driver of tractor TF011without safety shoes. •Paroh Estate: Harvester in Field 2014B was without safety helmet and rubber boots, tractor driver of tractor TF013 without		Corrective action: Standardization of PPE checklists (daily) and reporting. Online apps for intervention of unsafe acts by the workers to promote awareness to safety & health at work.	wearing proper PPE during work, with OPP-Safety Whistle issued for any non-compliance. 3. Sighted established checklist of PPE inspection daily and stock			

		safety shoes and FFB loaders loading FFB into trailer of tractor No. TF013 without safety helmet and rubber boots	to ensure all workers have been provided with PPE and monitor compliance at work	inspection. 4. Sighted Training records on 08/12/2021 for PPE Refreshment Training (Tractor drivers & loaders) 5. Storekeeper will monitored Bin card of PPE stock by daily basis Status: closed
7.3.2 RMN 01	Minor	Finding: The waste disposal method was not in line with waste management plan. Objective evidence: Sighted during site visit at below estates: 1.Lavang Estate Based on 5th Schedule; storage of scheduled waste was found exceeding 180 days without special approval. (SW 404 & SW 409 since May 2021). Sighted also at landfill empty pesticides container, used tires and Electrical waste been left unattended. 2.Belian Estate Storage of SW 305 & SW 410 were found exceeding 180 days without special approval.	Root cause: Lack monitoring and awareness on Schedule waste management Corrective action: Immediately conduct training scheduled waste management to each CU	Handling and management of scheduled waste have been improved and in accordance with company waste management plan and procedure. Hence previous MINOR NCR RMN 01 satisfactory closed.
7.7.6 STK 01 2021	Major	Finding: Existing plantings on peat were not managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance Objective evidence: At time of visit there were no weirs in Fields 2019A and 2019B on Lavang Estate, in 2021replant on Ruai Estate. While some of the sand bag weirs were not maintained (found leaking and over grown with weeds e.g. weirs nos. 2,3,&4). At Ruai Estate in the peat soil areas in the 2021 replant there were no poles established for measurement of peat subsidence indicating that peat subsidence was currently not monitored.	Root cause: The PSP in Ruai Estate were inadvertently taken down during the replanting activities due to no proper marking and lack of knowledge among the replanting team. The weirs in Lavang Estate were not maintained for some time due to flood mitigation project in Belian & Lavang Estates which will eventually resolve the flooding issue at Lavang peat areas. The whole project includes upgrading of weirs at Lavang Estate. Corrective action: 1) Appointment of person in-charge of peat in Ruai Estate	Sighted appointment letter for person incharge (assistant manager) for monitoring of peat planting management on date 09/12/2021. Also sighted the established a gant chart for monitoring and for installation weirs / soil bags, peat subsidence pole at peat area. Mangent also established weirs/ soil bags maps and peat subsidence pole & piezometer location maps for esasily monitoring. Replacement of damage weirs / sandbags has stated on 16/12/2021 Status: closed

RSPO PUBLIC SUMMARY REPORT						
2) Comprehensive budget for water management in Lavang Estate FY2022 3) Refresher training on peat management for RUE & LVE Team 4)Re-install PSP at Ruai Estate 5)Repair/upgrade weirs at Lavang Estate						

ATTACHMENT 6 - Timebound Plan as of March 2021

SDP - RSPO Certification for Time Bound Plan - Malaysia Operations

No	Management Unit SOU Name	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
		Sungai Dingin Oil	-		Certified		
		Mill Anak Kulim Estate	-		Certified		
		Sungai Dingin Estate	-		Certified		
		Somme Estate	-		Certified		
1	Sg. Dingin	Bukit Selarong Estate	-	Karangan, Kedah	Certified	12-Aug-11	
		Padang Buluh Estate	-		Certified		
		Bukit Hijau Estate	-		Certified		
		Jentayu Estate	-		Certified		
		Chersonese Oil Mill	-	Kuala Kurau, Perak	Certified	5-Oct-11	
		Chersonese Estate	-		Certified		
2	Chersonese	Kalumpong Estate	-		Certified		
		Tali Ayer Estate	-		Certified		
		Holyrood Estate	ı		Certified		
		Elphil Oil Mill	-		Certified		
2	Flak:I	Kamuning Estate	-	Sg Siput, Perak	Certified	10 1 14	
3	Elphil	Elphil Estate	ı		Certified	18-Jun-11	
		Kinta Kellas Estate	ı		Certified		
4	Flemington	Flemington Oil Mill	ı	Teluk Intan, Perak	Certified	5-Oct-11	

		Flemington Estate	-		Certified		
		Bagan Datoh Estate	-		Certified		
		Sabak Bernam Estate	-		Certified		
		Sg. Samak Estate	-		Certified		
		Seri Intan Oil Mill	-		Certified		
		Selaba Oil Mill	-		Certified		
		Seri Intan (+ Selaba) Estate	-		Certified		
-	Seri	Sabrang Estate	1	Teluk Intan, Perak	Certified	2.1444	
5	Intan/Selaba	Sogomana Estate	1		Certified	3-Mar-11	
		Sg. Wangi Estate	-		Certified		
		Bikam Estate	-		Certified		
		Cluny (+ Bedford) Estate	-		Certified		
		Tennamaram Oil Mill	-	Bestari Jaya, Selangor	Certified		
6	Tennamaram	Tennamaram Estate	1		Certified	3-Mar-11	
		Sungai Buluh Estate	-		Certified		
		Bukit Talang Estate	-		Certified		
		Bukit Kerayong Oil Mill	-		Certified		
7	Bkt Kerayong	Bukit Kerayong Estate	-	Kapar, Selangor	Certified	15-Apr-11	
		Bukit Cheraka Estate	-		Certified	13 / (р. 11	
		Elmina Estate	-		Certified		
0	Foot	East Oil Mill	ı	Communicated Colors	Certified	10 May 10	
8	East	East Estate	ı	Carey Island, Selangor	Certified	19-May-10	

		Sepang Estate					
		Dusun Durian Estate	-		Certified		
		West Oil Mill	-		Certified	40.14 40	
9	9 West	West Estate	-	Carey Island, Selangor	Certified	19-May-10	
40		Bukit Puteri Oil Mill	-		Certified	7.1.144	
10	Bukit Puteri	Bukit Puteri Estate	-	Raub, Pahang	Certified	7-Jul-11	
		Kerdau Oil Mill	-		Certified		
		Kerdau Estate	-		Certified		
		Jentar Estate	-		Certified		
11	Kerdau	Mentakab Estate	-	Temerloh, Pahang	Certified	7-Jul-11	

No	Management Unit	Supply Base	Time Bound	Location	Status	Certified Date	Remarks
	SOU Name		Plan				
		Chenor Estate	-		Certified		
		Sg Mai Estate	-		Certified		
42		Jabor Oil Mill	-	, , D.	Certified	7.1.144	
12	Jabor	Jabor Estate	-	Kuantan, Pahang	Certified	7-Jul-11	
42		Labu Oil Mill	-	Nilai, Negeri Sembilan	Certified	30-Dec-11	
13	Labu	Labu Estate	-		Certified		New Labu Estate has became a division of Labu Estate.
		Tanah Merah Oil Mill	-		Certified		
14	Tanah Merah	Tanah Merah Estate	-	Port Dickson, Negeri	Certified	19-May-10	
		Bukit Pelandok Estate	-	Sembilan	Certified	,	
45		Sua Betong Oil Mill	-	Port Dickson, Negeri	Certified	40.5-1-44	Cilias Fatata has now have married into Calal.
15	Sua Betong	Sua Betong Estate	-	Sembilan	Certified	18-Feb-14	Siliao Estate has now been merged into Salak Estate and Bradwall Estate. Siliao Estate has now

		Sengkang Estate	-		Certified		been merged into Salak Estate and Bradwall	
		Bradwall Estate	-		Certified		Estate.	
		PD Lukut Estate	-		Certified			
		Tampin Linggi Estate	-		Certified			
		Sg. Bahru Estate	-		Certified			
		Salak Estate	-		Certified			
		Kok Foh Oil Mill	-		Certified		Sg Gemas Estate has now been merged into Sg Senarut Estate	
		Muar River Estate	-		Certified			
		Sg. Senarut Estate	-		Certified			
		Sg. Gemas Estate	-	Bahau, Negeri Sembilan	Certified			
16	Kok Foh	Kok Foh Estate	-		Certified	7-Jul-11		
		Bukit Pilah Estate	-		Certified			
		St. Helier Estate	-		Certified			
		Sungai Sabaling Estate	-		Certified			
		Pertang Estate	-		Certified			
		Kempas Oil Mill	-		Certified		Serkam Estate, previously from SOU18(Diamond Jubilee) is now	
47		Kempas Estate	-		Certified	40.14	part of SOU 17(Kempas)	
17	Kempas	Tangkah Estate	-	Jasin, Melaka	Certified	19-May-10		
		Kemuning Estate	-		Certified			
		Diamond Jubilee Palm Oil Mill	-	Jasin, Melaka	Certified			
40	Diamond	Serkam Estate	-		Certified	50.44		
18	Jubilee	Diamond Jubilee Estate	-		Certified	5-Oct-11		
		Bukit Asahan Estate	-		Certified			

		Pagoh Oil Mill	-		Certified		Serkam Estate, previously from SOU18(Diamond Jubilee) is now
		Pagoh Estate	-		Certified		part of SOU 17(Kempas)
19	Pagoh	Welch Estate	-	Muar, Johor	Certified	28-Jan-14	Welch Estate, previously from SOU 19(Pagoh) is now part of SOU 18(Diamond Jubilee)
19	Ŭ	Lanadron Estate	-	,	Certified		18(Diamond Jubilee)
		Pengkalan Bukit Estate	-		Certified		
		Chaah Oil Mill	-	Chaah, Johor	Certified		
		Chaah Estate	-		Certified	18-Nov-10	
20	Chaah	Sg. Simpang Kiri Estate	-		Certified		
		North Labis Estate	-		Certified		
		Gunung Mas Oil Mill	-		Certified		* SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng
		Gunung Mas Estate	-		Certified		Estate is merged into Bk Paloh Estate of SOU 21 Gunung Mas, Lian
21	Gunung Mas	Kempas Klebang Estate	-	Kluang, Johor	Certified	19-May-10	Seng has been incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018.
		Bukit Paloh Estate	i		Certified		
		Yong Peng Estate	-		Certified		

No	Management Unit SOU Name	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
22	Bukit Benut	Bukit Benut Estate	-	Kluang, Johor	Certified	5-Oct-11	* SDP acquired Talisman Estate in Johor in April 2017. Talisman
		Bukit Benut Oil Mill	-		Certified		Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut
		Lambak Elaeis Estate	-		Certified		in 2018.
		CEP Nyior Estate	-		Certified		

		Ulu Remis Oil Mill	-		Certified		
		Ulu Remis Estate	-		Certified		
		Cenas Estate	-		Certified		
23	Ulu Remis	Bukit Badak Estate	-	Layang-layang, Johor	Certified	11-Apr-11	
		Tun Dr. Ismail Estate	-		Certified		
		Pekan Estate	-		Certified		
		Sembrong Estate	-		Certified		
		Hadapan Oil Mill	-	Layang-layang, Johor	Certified		
		Sri Pulai Estate	-		Certified	29-Mar-11	
24		Kulai Estate	-		Certified		
		Layang Estate	-		Certified		
		CEP Renggam Estate	-		Certified		
		Sandakan Bay	-		Certified		
		Tun Tan Siew Sin	-	Sandakan, Sabah	Certified		
26		Tunku Estate	-		Certified	1-Oct-08	
26	ŀ	Tigowis Estate	-		Certified		
		Sentosa Estate	=		Certified		
		Segaliud Estate	-		Certified		

					1		
		Melalap Oil Mill	-		Certified		
27	Melalap	Melalap Estate	-	Tenom, Sabah	Certified	21-Jan-11	
		Sapong Estate	-		Certified		
		Binuang Oil Mill	-		Certified		
		Binuang Estate	-		Certified		
28	Binuang	Sungang Estate	-	Kunak, Sabah	Certified	16-Jan-09	
		Tingkayu Estate	-		Certified		
		Jeleta Bumi Estate	-		Certified		
		Giram Oil Mill	-		Certified		
29	Giram	Giram Estate	-	Kunak Sabah	Certified	16-Jan-09	
	Merotai	Mostyn Estate	-	Tawau, Sabah	Certified		
		Merotai Oil Mill	-		Certified		
		Merotai Estate	-		Certified		
30		Imam Estate	-		Certified	16-Jan-09	
		Tiger Estate	-		Certified		
		Table Estate	-		Certified		
		Lavang Oil Mill	-		Certified		
		Lavang Estate	-		Certified		
		Rasan Estate	-		Certified		
		Belian Estate	-		Certified		
		Kelida Estate	-		Certified		
31	Lavang	Lavang (Special) Estate	-	Bintulu, Sarawak	Certified	30-Dec-11	
		Pekaka Estate	-		Certified		
		Ruai Estate	-		Certified		
		Dulang Estate	-		Certified		
		Charquest Estate	-		Certified		

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

Legends

NA - NOT APPLICABLE

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

No	Management Unit	- Mill and Supply Base	Time Bound Plan	Latest Internal /	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name	,		External Audit Date				,
1	PT Lahan Tani Sakti	Alur Dumai Mill	-		Rokan Hilir	Certified	16-Jan-12	
1	PT Lanan Tani Sakti	Alur Dumai Estate	-		District – Riau	Certified	10-Jan-12	
		Mustika Mill	-			Certified		
		Mustika Estate	-		Tanah Bumbu _ District – South	Certified		
2	PT Sajang Heulang	KKPA-2 PT.SHE Estate	-			Certified	3-Jul-13	
		KKPA-3 PT.SHE Estate	-		Kalimantan	Certified		
		KKPA-5 PT.SHE Estate	-			Certified		
		Angsana Mill	-			Certified		
		Angsana Estate	-			Certified	6-Jul-11	
		Pantai Bonati Estate	-			Certified	p-Jul-11	
		Gunung Sari Estate	-			Certified		
3	PT Ladangrumpun Suburabadi	Subur Abadi Plasma 1 Estate	2020	Jul-19	Tanah Bumbu District – South Kalimantan	Stage Two		PT LSI Plasma has been audited by the Certification Body in 2017. The identified legal issue on HGU is being address.
		KKPA-1 PT.SHE Estate	-			Certified	C 1l 11	
		KKPA-4 PT.SHE Estate	-			Certified	6-Jul-11	

		Bebunga Mill	-			Certified		
		Bebunga Estate	-			Certified		
	PT Langgeng	Sungai Cengal Estate	-		Kotabaru	Certified		
4	Muaramakmur	Bakau Estate	-		District – South Kalimantan	Certified	16-Mar-12	
		KKPA LMR	2020		Kammantan	-		Previously KKPA Sg. Cengal. Sime Darby Plantation does not have management control over the plasma scheme.
		Sukamandang Mill	-		Seruyan and	Certified		
		Sukamandang Estate	-		East	Certified		
5	PT Kridatama Lancar	Sapiri Estate	-		Kotawaringin District –	Certified	5-Jul-11	
		Barasdanum Estate	-		Central	Certified		
		Kuala Kuayan Estate	-		Kalimantan	Certified		
		Ladang Panjang Mill	-			Certified	9-Jul-12	
		Ladang Panjang Estate	-			Certified	9-Jul-12	Only Division 3 (1200ha) was certified. Division 1 & 2 with 1792 Ha received HGU recently. The unit is getting ready for certification. Plan for certification in 2020. Total Ladang Panjang Estate is 2992 ha.
6	PT Bahari Gembira Ria	Plasma BGR Estate	2020	Nov-19	Muaro Jambi District - Jambi	-		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.

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

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

	1	T			T			
		Teluk Bakau Mill	-		_	Certified		
		Teluk Bakau Estate	-			Certified	11-Oct-11	
		Nusa Lestari Estate	-		<u> </u>	Certified	11-001-11	
16	PT Bhumireksa Nusa Sejati	Nusa Perkasa Estate	-		Indra Giri Hilir District – Riau	Certified		
	36juti	Mandah Mill	-			Certified		
		Mandah Estate	-			Certified	1-Apr-14	
		Rotan Semelur Estate	-			Certified		
		Teluk Siak Mill	-			Certified		
17	7 DT Anaka Intinarcada	Teluk Siak Estate	-		Pekanbaru, Siak	Certified	11 0-+ 11	
17	PT Aneka Intipersada	Pinang Sebatang Estate	-		District – Riau	Certified	11-Oct-11	
		Aneka Persada Estate	-			Certified		
		Ungkaya Mill	-		Morowali	Certified		
18	PT Tamaco Graha Krida	Ungkaya Estate	-		District – Sulawesi	Certified	10-Jul-12	
		Plasma TGK Estate	-	Mar-20	Tengah	-		Perijinan' process is ongoing
		Bukit Ajong Mill	-			Certified		
		West Estate	-			Certified	18-Oct-10	Land legalisation process for East Est for 5815.64 ha is still in process.
		East Estate	-		Sanggau District - -West Kalimantan	Certified		3013.04 fld i3 still ill process.
19	PT SIME Indo Agro	East* Estate /Sei Mawang Estate	2020	Jul-19		-		Land legalisation for Sei Mawang is still in process
		East Plasma Estate	-			Certified	10 1 1 1 6	
		West Plasma Estate	-			Certified	18-Jul-16	
		Blang Simpo Mill	-			Certified		
	PT Padang Palma	Tamiang (PT PPP) Estate	-		Aceh Tamiang	Certified		
20	Permai / PT Perkasa Subur	Batang Ara (PT PSK) Estate	-		and East Aceh District – Nanggroe Aceh	Certified	3-May-13	
	Sakti	Blang Simpo-01 Estate	-		Darussalam	Certified		
		Blang Simpo-02 Estate	-			Certified		
21	PT Sandika Natapalma	Lembiru Mill	-		Ketapang District – West	Certified	3-Jul-14	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e.

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

Legends

Properties was sold.

Mill closed down/Mothballed

NA - NOT APPLICABLE

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

No	Management Unit	Supply Base	Time Bound	Location	Status	Certified Date	
140	SOU Name	Supply base	Plan	Location	Status	Certified Date	
		Tetere Oil Mill					
		Tetere Estate					
		Ngalimbiu Estate					
1	Guadalcanal Plains Palm Oil Limited	Mbalisuna Estate	NA NA	Guadalcanal Province, Solomon	Certified	18-Mar-11	
-	(GPPOL)	Smallholders – West Zone (83)	IVA	Islands	Certified	10 Wai 11	
		Smallholders – Central Zone (53)					
		Smallholders – MBA East Zone (59)					
		Smallholders – MBE East Zone (37)					
		Hagita Oil Mill					
		Giligili Estate					
		Hagita Estate					
		Waigani Estate					
		Sagarai Estate		Milno Pay Province			
2	Milne Bay Estates (MBE)	Padipadi Estate	NA	Milne Bay Province, Papua New Guinea	Certified	15-Feb-18	
		Mariawatte Estate					
		Smallholders - East Gurney Estate (264)					
		Smallholders - West Gurney Estate (229)					
		Smallholders - East Sagarai Estate (157)					
		Smallholders - West Sagarai Estate (221)					

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

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

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

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

	Management Unit	ertification for Time Bound Plan - Libe					
No	SOU Name	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
1	Sime Darby Plantation (Liberia) Grand Cape Mount	Grand Cape Mount Mill	Not Applicable - Property disposed	Grand Cape Mount County	Not yet Certified		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.co m/media/press-releases/sime- darbyplantation-completes- divestment-of-its-liberia-operations
		Bomi Estate					
		Lofa Estate					
		Matambo Estate					
		Grand Cape Mount Estate					