



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

**File Ref. : ES10171014**

**RSPO PUBLIC SUMMARY REPORT**

**CLIENT : SIME DARBY PLANTATION BERHAD – SOU 32 RAJAWALI**

**PARENT COMPANY : SIME DARBY PLANTATION BERHAD**

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

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

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
Rajawali Certification Unit	Rajawali Palm Oil Mill	N3.37066	E113.4003	Kilang Kelapa Sawit Rajawali, KM52 Jalan Bintulu/Miri P.O Box 2324, 97011 Bintulu Sarawak.
	Rajawali Estate	N3.42595	E113.3792	Rajawali Estate, P. O. Box 673, 97011 Bintulu, Sarawak.
	Semarak Estate	N3.36305	E113.3825	Semarak Estate, P.O box 2070, KM52, Jalan Bintulu-Miri, 97011 Bintulu, Sarawak.
	Samudera Estate	N3.56449	E113.3733	Samudera Estate, P. O. Box 2330, 97011 Bintulu, Sarawak.
	Bayu Estate	N3.48237	E113.3976	Bayu Estate, P.O.Box 2596, KM 65, Bintulu-Miri Road, 97011 Bintulu, Sarawak.

**MAP :** See Attachment 1

**AUDIT DATE : 11 – 14 OCTOBER 2022**

**DURATION : 22 auditor days**

**TYPE OF AUDIT :** ☒ Annual Surveillance Audit 1

☐ Recertification Audit

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

**SCOPE OF CERTIFICATION:** Production of Sustainable Crude Palm Oil and Palm Kernel Using the Identity Preserved Supply Chain Model.

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

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

Non-conformity Report(s) ☒

List of additional site(s) ☐

**Report by Audit Team Leader**

**Acknowledgement by Client's Representative**

Name : MOHD ZULFAKAR KAMARUZAMAN

Name : Amirul Akmal Daud

Signature :

Signature :

Date : 25/01/2023

Date : 26/1/2023

## SUMMARY OF AUDITS

Recertification Audit (Combined Audit with SA4)				
On-site audit date :	29th Nov. – 4th Dec. 2021		No. of auditor days:	27 auditor days
Audit team :	Dzulfiqar Azmi (LA), Rozaimee Abd. Rahman, Rohazimi Mat Nawi, Rahayu Zulkifli, Mohd Norddin Abd Jalil			
No. of major NCR :	1	Indicator: 3.4.3		Closing date: 14/02/2022
No. of minor NCR :	3	Indicator: 2.1.2, 3.3.2, 3.7.2		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	√		√	
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	√		√	√
	Indigenous people	Contractor	Others (Please specify)	
	NA	√		
Supply base sampled :	Rajawali, Samudera, Semarak & Bayu Estates			
Changes since the last audit :	Changes in planted ha is due to reclamation of fallow area which are no longer consider as CSA area. GPS team had conducted GPS mapping to update more accurate area statement in the SEMUA Field Master Data. The field hectareage has been updated in SAP system in Dec 2020 after approved by Chief Executive Officer, Upstream Malaysia. Previous planted ha @ 9,790.52 ha.			
Justification of audit planning :	Allocation of mandays during onsite: 8-man days balanced from remote audit ASA 4 and 19-man days RA 2021 to covers 1 POM and 4 estates. Combined audit ASA4-2020 & RA-2021.			
Name of peer reviewer :	Prof. Emeritus Dr Jalani Sukaimi			
Report approved by :	Kamini Sooriamoorthy		Approval date : 8/03/2022	

Annual Surveillance Audit 1				
On-site audit date :	11-14 October 2022		No. of auditor days :	22 auditor days
Audit team :	Mohd Zulfakar Kamaruzaman, Mohd Ab Raouf Asis, Amir Bahari, Dzulfiqar Azmi, Ismail Adnan Abdul Malek, Mohd Norddin Abdul Jalil.			
No. of major NCR :	1	Indicator: 3.7.1		Closing date : 13/01/2023
No. of minor NCR :	1	Indicator : 3.7.3		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	√		√	
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	√		√	√
	Indigenous people	Contractor	Others (Please specify)	
	NA	√		
Supply base sampled :	Rajawali, Samudera, Semarak & Bayu Estates			
Changes since the last audit :	**Changes is planted areas (0.20 ha) in Semarak Estate due to miscalculation from last year planted areas.			
Justification of audit planning :	Allocation of mandays during onsite: 22 days to covers 1 POM and 4 estates.			
Report approved by :	Kamini Sooriamoorthy		Approval date : 25/01/2023	

## SUMMARY OF INFORMATION

**TABLE 1**

	RA	ASA 1	ASA 2	ASA 3	ASA 4
<b>Projection Period</b>	Nov. 2021 – Oct. 2022	Oct 2022 – Sept 2023			
<b>Certified FFB Processed (MT)</b>	154,266.11	133,778.76			
<b>Production of Certified CPO (MT)</b>	34,049.07	29,431.33			
<b>Production of Certified PK (MT)</b>	7,977.54	6,688.94			
<b>Certified Areas (Ha)</b>	14,104.45	14,104.45			
<b>Planted Areas (Ha)</b>	9,926.40	**9,926.60			
<b>Production Areas (Ha)</b>	8,155.76	8,224.36			
<b>HCV Areas / Conservation Areas (Ha)</b>	275.40	275.40			
<b>REMARKS</b>	**Changes is planted areas (0.20 ha) in Semarak Estate due to miscalculation from last year planted areas.				

**TABLE 2**

	CPO	PK
Last years certified volume (MT)	34,049.07	7,977.54
Last years actual certified sold (MT)	0.00	850.00
Last years actual sold under other schemes (MT)	0.00	0.00
Last year's sold conventional (MT)	19,001.66	3,426.23
Last year actual sold CSPO credits (where applicable)	0.00	0.00
New year certified volume (MT)	29,431.33	6,688.94

<b>Table of contents</b>	<b>Page</b>
1.0 AUDIT PROCESS	5
1.1 Certification body	5
1.2 Qualification of audit team	5
1.3 Audit methodology	6
1.4 Stakeholder consultation	6
1.5 Audit plan	9
1.6 Date of next audit	9
2.0 SCOPE OF CERTIFICATION AUDIT	9
2.1 Description of the certification unit	9
2.2 Description of the Supply Base (including planting profile)	9
2.3 Organization Information / Contact Person(s)	11
3.0 AUDIT FINDINGS	12
3.1 Changes to certified products in accordance to the production of the previous year	12
3.2 Progress and changes in time bound plan	12
3.3. Other changes (e.g. organizational structure, new contact person, addresses, etc.)	12
3.4 Status of previous non-conformities * (refer to Attachment 5)	12
3.5 Complaint received from stakeholder (if any)	12
4.0 DETAILS OF NON-CONFORMITY REPORT	13
4.1 For P&C (refer to Attachment 3)	13
4.2 For SC (refer to Attachment 3 – Supply Chain Requirements for Mills)	13
5.0 AUDIT CONCLUSION	13
6.0 RECOMMENDATION	13
List of Attachment	
Attachment 1 : Map of CU	15
Attachment 2 : RSPO Audit Plan	16
Attachment 3 RSPO P&C Audit Checklist And Findings	24
Attachment 4 : Details of Non-conformities and Corrective Actions Taken	76
Attachment 5 : Status of Non-conformities Previously Identified	78
Attachment 6 : Time-bound Plan	80

## 1.0 AUDIT PROCESS

### 1.1 Certification Body

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

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and re-accredited by ASI on 3 October 2019 (accredited 2014).

### 1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Zulfakar bin Kamaruzaman	Lead Auditor / Supply Chain, TBP,	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C, RSPO Supply Chain and MSPO Certification.
Mohd. Ab Raouf bin Asis	Auditor / Social (Mill & Plantation Employees),	Holds a B.Sc. in Manufacturing (Production and Operation). He had more than 7 years of working experience in the oil palm operation. Currently he qualified as Lead Auditor for RSPO P&C and MSPO Certification.
Dzulfiqar Azmi	Auditor / Environment, GHG	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He starts auditing in the sustainable scheme since 2018 and has successfully passed the RSPO Lead Auditor and ISO Integrated Management System lead assessor course in 2018.
Amir B Bahari	Auditor, Occupational health and safety	Possessed B Sc (Hons) USM and Diploma Palm Oil Milling Technology/Management 1996 MPOB. Working experience for 30 years in the oil palm industry including in the mill and estates. A qualified RSPO P & C Auditor with experience in ISO, EMS and RSPO/MSPO auditing.
Mohd Norddin Abd Jalil	Auditor / Good Agricultural Practices (GAP)	Holds a B.Sc.in Agriculture from Universiti Pertanian Malaysia. He has over 35 years working experience in the oil palm plantation operation.
Ismail Adnan bin Abdul Malek	Auditor / Social (Land Title & External Stakeholders), HCV	Holds a Master of Forestry, University of British Columbia, Canada. experience as Sub Assistant Conservator, involved with Forest Administration/Management and Enforcement. seven years as Forest Officer/Logging Superintendent. Senior Lecturer, UPM. A qualified RSPO P & C Auditor with experience in Forest, Social and MSPO auditing.

### 1.3 Audit methodology

The audit covered the SOU Rajawali inclusive of Binuang POM and Four (4) of its supply base. The sampling methodology applies for supply base with higher than four estates. The sampling shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The Four (4) supply base covered during the audit are Rajawali Estate, Semarak Estate, Samudera Estate and Bayu Estate. The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

### 1.4 Stakeholder Consultation

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

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<p>The following were confirmed during the conduct of audit as there was no evidence to prove otherwise:</p> <ul style="list-style-type: none"><li>▪ All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in English/Bahasa as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer.</li><li>▪ They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime.</li><li>▪ They have been getting salaries above RM1,500 since May 2022. Salaries were paid before the 7th of every month.</li><li>▪ No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment.</li><li>▪ No discrimination between migrant workers and local workers, between male and female workers.</li><li>▪ Comfortable housing with water and electricity provided.</li><li>▪ Have access to affordable food from the canteen/sundry shops within the estate/mill premises.</li><li>▪ Entitled to free medical facilities at the estate clinic.</li><li>▪ Have representatives who attend regular meetings with the management where they can put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects.</li><li>▪ They knew the types of work offered at Rajawali CU (mill &amp; estates) when they were in their countries of origin.</li><li>▪ All migrant workers keep their own passports.</li><li>▪ Shuttle services FOC once a month for workers go to nearest town.</li><li>▪ Monthly recognition for workers i.e. highest harvesting productivity and housing cleanness</li><li>▪ Alternate Sunday/Rest Work</li><li>▪ Complaint channel via various platform i.e. Suara Kami (Platform by Nestle), Impactt (Ulula), WMU Careline (From Region), Whistleblowing (HQ).</li><li>▪ Freedom Decision Movement by worker for medical</li></ul>

		access and leaving of workplace during rest or public holiday via implemented the Guideline Medical Access Procedure & Guideline of Leaving of Workplace.
2) Settlers		No settlers living in Rajawali CU
3) Villagers / Local communities (including women representatives, displaced communities)		<ul style="list-style-type: none"> <li>As for this Audit, the audit team interviewed with local communities Representative from Kg Wawasan Jaya, Tuai Rumah Seliong, Tuai Rumah Kedi and Ketua Kampung Nyalau confirmed that there was no new land claim made by the Indigenous people since Sime Darby released the disputed land in 2012.</li> <li>Occasionally are called to attend meetings by Rajawali CU. The last one was held 15 September 2022.</li> <li>All stakeholders were Invited to attend RSPO/MSPO briefings and stakeholder meetings.</li> <li>Rajawali CU is operating harmoniously with surrounding oil palm smallholdings.</li> <li>No issue about pollution.</li> <li>Some workers who work at Rajawali CU come from neighbouring places around the mill/estates.</li> </ul>
4) Suppliers		<ul style="list-style-type: none"> <li>Suppliers of hardware and FFB transporters since 1997.</li> <li>Rajawali CU and supplier contract were signed by both parties. Suppliers would be contacted to supply hardware items as and when the need arises. FFB transporter's service was needed when required. This happens approximately once in two months for suppliers but daily for transporters.</li> <li>Fair dealings with the units in Rajawali CU.</li> <li>Payments are made within 1 months of invoice.</li> </ul>
5) Contract workers		<ul style="list-style-type: none"> <li>Contract workers mainly for FFB Drivers. There is no issue on contract workers highlighted during the audit. No late salary payment to contract workers found.</li> </ul>
6) Local & national NGOs		<ul style="list-style-type: none"> <li>No issues.</li> </ul>
7) Government agencies / Statutory bodies		<ul style="list-style-type: none"> <li>Harmonious co-existence with Government agencies / Statutory bodies.</li> <li>Document review and consultation showed officers of the relevant Government agencies such as the Jabatan Tenaga Kerja Bintulu, Sarawak Forest Department and Sarawak Forestry Corporation had good working relationship with Rajawali CU.</li> <li>Government agencies consulted also confirmed no offenses incurred by Rajawali CU.</li> </ul>
8) Independent growers / Smallholders		<ul style="list-style-type: none"> <li>No issues.</li> </ul>
9) Indigenous people		<ul style="list-style-type: none"> <li>As for this Audit, the audit team interviewed with local communities and they confirmed that there was no new land claim made by the Indigenous people since Sime Darby released the disputed land in 2012.</li> </ul>
10) Contractor		<ul style="list-style-type: none"> <li>All Contractors had provided services to Rajawali CU mill/estates for the past 4-5 years. Each signed a contract and understands contractual obligations and the need to comply with legal requirements.</li> <li>Fair dealings with the units in Rajawali CU.</li> <li>Payments are made within 1 months of invoice.</li> <li>For transporter contractor, the estate mandore and staff will verify the work the contractor has done before his invoice can be approved for payment.</li> <li>All contractors' workers had attended MSPO training, signed COBC commitment statement and</li> </ul>

		<p>safety. briefing. The Company provides PPE.</p> <ul style="list-style-type: none"> <li>▪ Suppliers of hardware and spare parts invoices were based on agreed quoted prices.</li> <li>▪ Payment to contractors were made usually within 45 days of invoice. Renewal of contract is via tender system.</li> <li>▪ Contractor and his workers knew about the minimum wages order requirement the workers make statutory contributions such as EPF and SOSCO. Workers details including names, pay slips, were presented for verification.</li> <li>▪ Contractor removes domestic waste from workers' quarters, provide recycling services. Signs annual contract. Terms and conditions are clear and fair. Payments are received within one month.</li> <li>▪ All contractors also were invited and attended stakeholder meetings.</li> <li>▪ Contractors must provide to the estate's copies of their worker details and payslips for reference/verification.</li> </ul>
	11) Previous land owner (if any)	<ul style="list-style-type: none"> <li>▪ It has been verified that the land belonged to Austral Enterprise Bhd. The land was bought by Golden Hope Plantation Sdn Bhd before its merge with Sime Darby in year of 2008. The audit team had confirmed that there were no land issues related to previous owners. No land was encumbered by customary rights or dispute from any stakeholder at Rajawali CU.</li> </ul>
	12) Others (please specify)	<ul style="list-style-type: none"> <li>▪ Sundry shop interviewed acknowledged that workers buy goods either in cash or on credit. Cases of workers absconding i.e. leaving the estate/mill without paying their debts are not prevalent.</li> </ul>



1.5 Audit plan : Refer to Attachment 2

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

## 2.0 SCOPE OF CERTIFICATION AUDIT

### 2.1 Description of the certification unit

The Rajawali Certification Unit (CU) is one of the the Strategic Operating Unit (SOU) of Sime Darby Plantation Berhad. (SDP). The CU is also known as SOU 32 and consisted of Rajawali Palm Oil Mill (RPOM), Rajawali Estate, Samudera Estate, Semarak Estate and Bayu Estate. The CU is located about 100km from Bintulu town and is accessible via the Bintulu-Miri Road.

Rajawali POM commenced its operations in 1993 with a processing capacity of 60 metric tonnes of FFB per hour. The total combined land area of the four estates is 14,104.45 hectares (Ha) of which 9,926.60 Ha had been planted with oil palm.

The Rajawali POM also holds the certificate for MSPO and MSPO SC.

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

The FFB is sourced from company owned estates that are certified. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables

**Table 1: Actual FFB production by the supply base for the last reporting period (Nov. 2021 – Sept. 2022)**

Estates	FFB Production	
	Tonnes	Percentage (%)
SOU 32		
Rajawali Estate	21,509.87	25.22
Semarak Estate	16,915.22	19.83
Samudera Estate	18,978.96	22.25
Bayu Estate	26,508.59	31.08
Diversification Crop from Certified unit SOU 33		
Damai Estate	499.61	0.59
Derawan Estate	141.48	0.17
Sahua Estate	439.86	0.52
Takau Estate	306.25	0.36
<b>Total</b>	<b>85,299.84</b>	<b>100.00</b>

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

CU own estates	FFB Contribution	
	Tonnes	Percentage (%)
Rajawali Estate	37,749.81	28.22
Semarak Estate	24,441.82	18.27
Samudera Estate	37,487.90	28.02
Bayu Estate	34,099.23	25.49
<b>Total</b>	<b>133,778.76</b>	<b>100.00</b>

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

	Total (MT)
FFB Received	*85,299.84
FFB Processed	85,299.84
CPO Production	19,001.66
PK Production	4,276.23
CPO delivered as RSPO certified	0.00
CPO delivered as non-RSPO certified	19,001.66
PK delivered as RSPO certified	850.00
PK delivered as non-RSPO certified	3,426.23
Credits traded through Books and Claim	0.00

\*Low FFB production due to shortage of labour

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

	Total (MT)
FFB Received	133,778.76
FFB Processed	133,778.76
CPO Production	29,431.33
PK Production	6,688.94

**Table 5: Planted and certified area of the SOU 32 Rajawali**

Estate	Planted (ha)	Certified (ha)
Rajawali Estate	3,275.04	6,087.27
Semarak Estate	2,281.19	3,308.60
Samudera Estate	2,233.11	2,459.90
Bayu Estate	2,137.26	2,248.68
<b>Total</b>	<b>9,926.60</b>	<b>14,104.45</b>

**Table 6: Planting profile for SOU 32 Rajawali**

<u>Estate</u>	<u>Year of planting</u>	<u>Planting Cycle</u>	<u>Mature &gt;3 years (Ha)</u>	<u>Immature &lt; 3 years(Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Rajawali Estate	1996	1st	801.57	0.00	801.57		
	1997	1st	133.62	0.00	133.62		
	2000	1st	64.12	0.00	64.12		
	2002	1st	38.22	0.00	38.22		
	2003	1st	41.04	0.00	41.04		
	2004	1st	46.47	0.00	46.47		
	2013	2nd	214.40	0.00	214.40		
	2014	2nd	210.10	0.00	210.10		
	2015	2nd	275.52	0.00	275.52		
	2016	2nd	185.52	0.00	185.52		
	2017	2nd	229.68	0.00	229.68		
	2018	2nd	324.15	0.00	324.15		
	2019	2nd	0.00	52.41	52.41		
	2020	2nd	0.00	311.87	311.87		
	2021	2nd	0.00	346.62	346.62		
<b>Total</b>			<b>2,564.14</b>	<b>710.90</b>	<b>3,275.04</b>	<b>78.29</b>	<b>21.71</b>
Semarak	1993	1st	81.86	0.00	81.86		

Estate	1994	1st	412.67	0.00	412.67		
	1995	1st	192.91	0.00	192.91		
	1996	1st	157.98	0.00	157.98		
	2004	1st	95.05	0.00	95.05		
	2016	2nd	369.37	0.00	369.37		
	2017	2nd	183.54	0.00	183.54		
	2018	2nd	303.25	0.00	303.25		
	2019	2nd	58.59	0.00	58.59		
	2020	2nd	0.00	50.35	50.35		
	2021	2nd	0.00	193.38	193.38		
	2022	2nd	0.00	182.24	182.24		
<b>Total</b>			<b>1,855.23</b>	<b>425.97</b>	<b>2,281.19</b>	<b>81.33</b>	<b>18.67</b>
Samudera Estate	1998	1st	478.82	0.00	478.82		
	1999	1st	219.07	0.00	219.07		
	2000	1st	841.65	0.00	841.65		
	2016	2nd	261.56	0.00	261.56		
	2017	2nd	108.55	0.00	108.55		
	2018	2nd	199.89	0.00	199.89		
	2020	2nd	0.00	123.57	123.57		
<b>Total</b>			<b>2,109.54</b>	<b>123.57</b>	<b>2,233.11</b>	<b>80.66</b>	<b>19.34</b>
Bayu Estate	1999	1st	157.03	0.00	157.03		
	2000	1st	1,060.65	0.00	1,060.65		
	2006	2nd	10.23	0.00	10.23		
	2008	2nd	5.61	0.00	5.61		
	2010	2nd	15.23	0.00	15.23		
	2017	2nd	236.25	0.00	236.25		
	2018	2nd	210.46	0.00	210.46		
	2019	2nd	0.00	74.49	74.49		
	2020	2nd	0.00	211.44	211.44		
	2021	2nd	0.00	155.87	155.87		
<b>Total</b>			<b>1,695.46</b>	<b>441.8</b>	<b>2,137.26</b>	<b>79.33</b>	<b>20.67</b>
<b>Sub Total</b>			<b>8,224.36</b>	<b>1,702.24</b>	<b>9,926.60</b>	<b>82.85</b>	<b>17.15</b>

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

The details of the contact person are as below:

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

### 3.0 AUDIT FINDINGS

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

Changes in planted area (0.20 ha) in Semarak Estate due to miscalculation from last year planted areas.

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

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

If no, comments on the organization's compliance with the RSPO partial certification rules :  
Details issues related to these were covered in the section - RSPO Certifications Systems for Principles & Criteria June 2017, in this report.

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

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

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

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

If no, please state reasons

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

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

No changes

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

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

3.5. Complaint received from stakeholder (if any)

No significant complaints from stakeholders were observed

<b>4.0</b>	<b>DETAILS OF NON-CONFORMITY REPORT</b>		
4.1	For P&C (Details checklist refer to Attachment 3) :		
	Total no. of minor NCR(s) (details refer to Attachment 3)	List : 1	3.7.3 (MZK 01 2022)
	Total no. of major NCR(s) (details refer to Attachment 3)	List : 1	3.7.1 (MAR 01 2022)
4.2	For SC (Details checklist refer to Attachment 5) :		
	Total no. of minor NCR(s) (details refer to Attachment 3)	List :	
	Total no. of major NCR(s) (details refer to Attachment 3)	List :	
<b>5.0</b>	<b>AUDIT CONCLUSION</b>		
	The audit team concludes that the organization has / <del>has not</del> * established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.		
<b>6.0</b>	<b>RECOMMENDATION</b>		
	<input type="checkbox"/>	No NCR recorded. Recommended to continue certification.	
	<input checked="" type="checkbox"/>	Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.	
		<i>Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs .</i>	
	<input checked="" type="checkbox"/>	Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.	
	<input checked="" type="checkbox"/>	Recommended to continue certification.	
	<input type="checkbox"/>	Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.	
		<i>Note: Major NCRs which are not addressed within a further 60 days shall result in the certificate being withdrawn.</i>	

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

Audit Team Leader : MOHD ZULFAKAR KAMARUZAMAN

\_\_\_\_\_  
(Name)

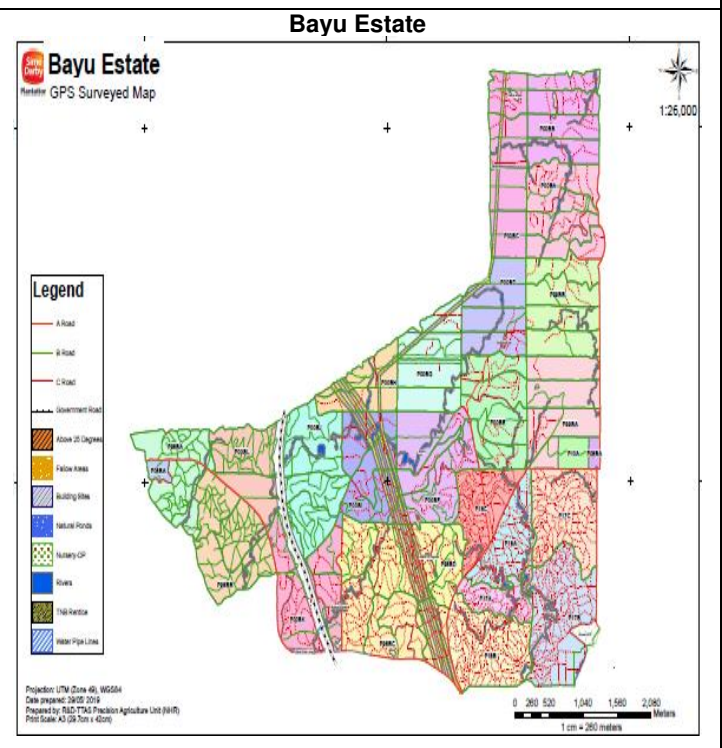
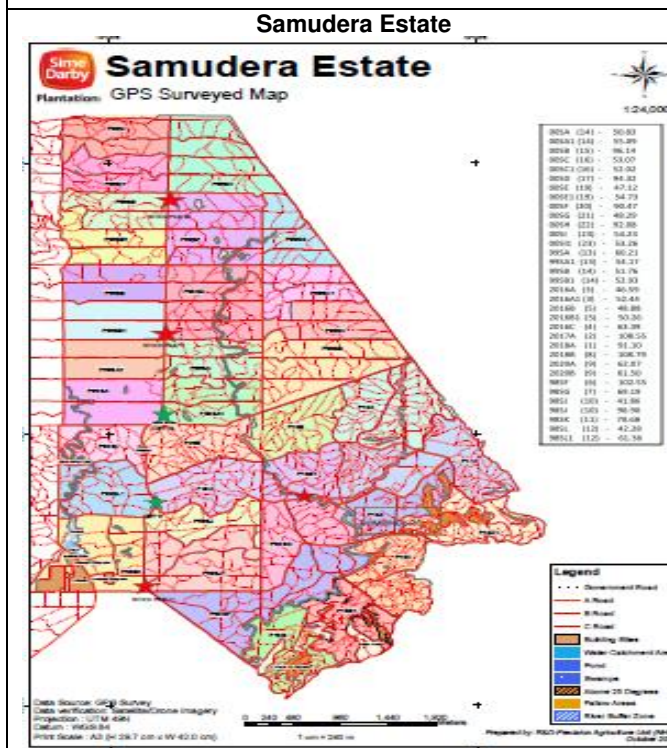
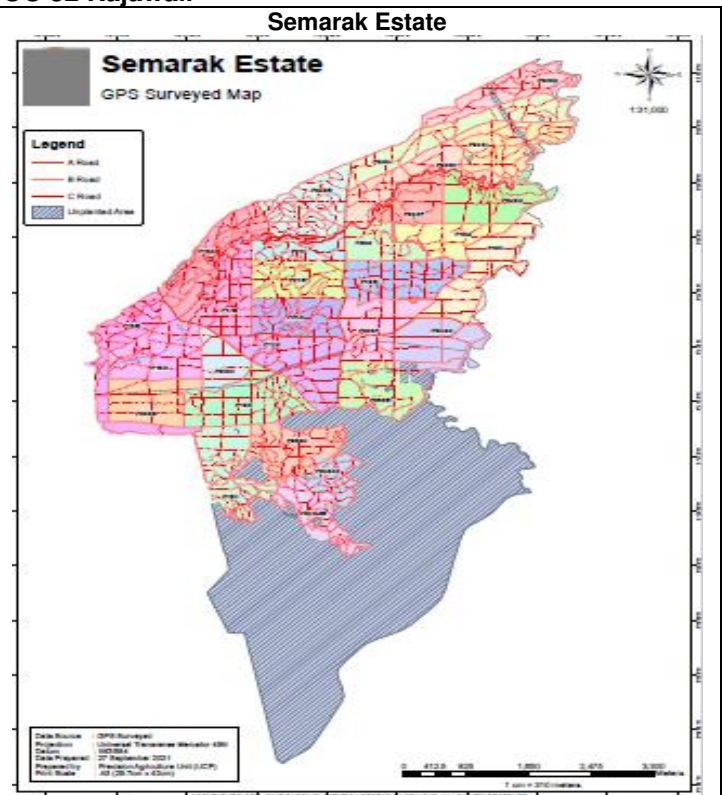
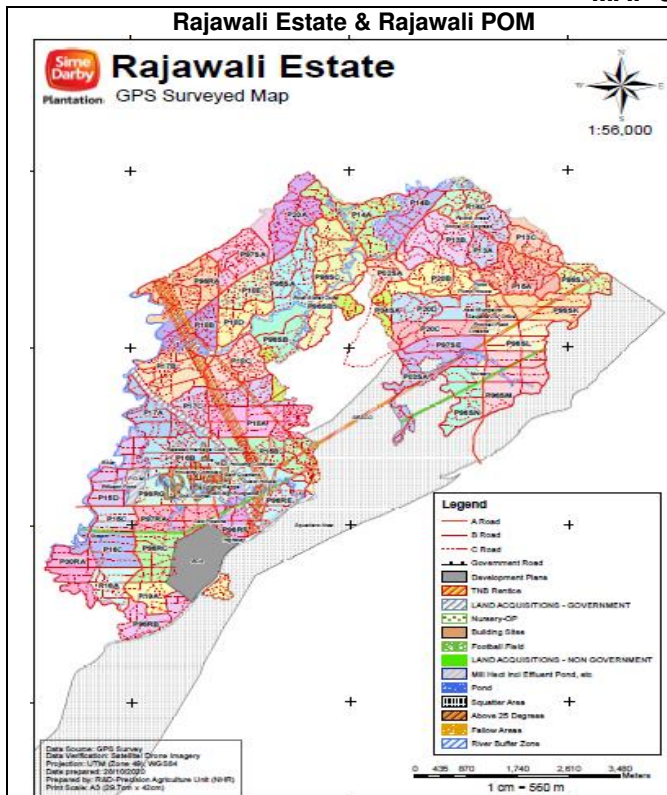


\_\_\_\_\_  
(Signature)

13/01/2023

\_\_\_\_\_  
(Date)

MAP of SOU 32 Rajawali



## 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** : 11 – 14 October 2022

3. **Site of assessment** : SOU 32 Rajawali

- Rajawali POM
- Rajawali Estate
- Semarak Estate
- Bayu Estate
- Samudera Estate

### 4. Reference Standard:

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

### 5. Assessment Team

Lead Auditor : Mohd Zulfakar Kamaruzaman (Social – Mill, SCCS, Metrics Template)

Auditor : Amir Bahari (Safety & Environment Mill and Safety Estate)  
 Mohd Ab Raouf Asis (Social – Internal (All Estate))  
 Mohd Norddin Abd Jalil (GAP, Best Practice)  
 Dzulfiqar Azmi (Environment all Estate GHG, TBP)  
 Ismail Adnan (Social – External All Estate, HCV)

Observer : -.

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

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

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

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

**Assessment Programme Details** : As below

## RSPO P&C PUBLIC SUMMARY

Date / Time	Coverage of assessment / Activity / Site	MZK	MNAJ	IA	MAR	DA	AB
Day 1-11/10/22 8.30am – 9.00am	<b>Opening Meeting – Venue: The Management SOU Rajawali Decide</b> <ul style="list-style-type: none"> <li>Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes</li> <li>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.</li> </ul>	/	NA	/	/	/	/
9.00am – 12.30pm	<b>Site observation to Rajawali Estate</b> <b>P1, P2, P3,P4,P5, P6, P7</b> <ul style="list-style-type: none"> <li>Verification of basic information estate/Metric templates</li> <li>Confirmation of time bound plan &amp; review of partial certification</li> <li>Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>Occupational safety &amp; health aspects , chemical management</li> <li>Interview with workers, contractors etc.</li> <li>Environmental management, waste &amp; chemical management</li> <li>Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the estate</li> <li>Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>Land titles user rights</li> <li>Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> <li>GHG Calculation</li> <li>New planting</li> </ul>		NA	/	/	/	

## RSPO P&C PUBLIC SUMMARY

	<b>Site observation to Rajawali POM</b> <b>P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Land titles user rights</li> <li>• Social aspects - SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the CU</li> <li>• Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM,</li> <li>• New planting</li> <li>• Occupational safety &amp; health aspects, chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> </ul>	/					/
12.30pm – 1.30pm	Lunch Break	/	NA	/	/	/	/
1.30pm – 5.00pm	Continue assessment at respective sites	/	NA	/	/	/	/

## RSPO P&C PUBLIC SUMMARY

Date / Time	Coverage of assessment / Activity / Site	MZK	MNAJ	IA	MAR	DA	AB
Day 2 – 12/10/22 8.30am – 12.30pm	<b>Site observation to Bayu Estate</b> <b>P1, P2, P3,P4,P5, P6, P7</b> <ul style="list-style-type: none"> <li>• Verification of basic information estate/Metric templates</li> <li>• Confirmation of time bound plan &amp; review of partial certification</li> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>• Land titles user rights</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> <li>• GHG Calculation</li> <li>• New planting</li> </ul>		/	/	/	/	/

## RSPO P&C PUBLIC SUMMARY

	<b>Site observation to Rajawali POM</b> <b>P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Land titles user rights</li> <li>• Social aspects - SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the CU</li> <li>• Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM,</li> <li>• New planting</li> <li>• Occupational safety &amp; health aspects, chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> </ul>	/					
12.30pm – 1.30pm	Lunch Break	/	/	/	/	/	/
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/	/	/

## RSPO P&C PUBLIC SUMMARY

Date / Time	Coverage of assessment / Activity / Site	MZK	MNAJ	IA	MAR	DA	AB
Day 3 – 13/10/22 8.30am – 12.30pm	<b>Site observation to Semarak Estate</b> <b>P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>• Verification of basic information estate/Metric templates</li> <li>• Confirmation of time bound plan &amp; review of partial certification</li> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>• Land titles user rights</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> <li>• GHG Calculation</li> <li>• New planting</li> </ul>		/	/	/	/	/
8.30am – 12.30pm	<b>Site observation to Rajawali Estate</b> <ul style="list-style-type: none"> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> </ul>	/					
12.30pm – 1.30 pm	Lunch Break	/	/	/	/	/	/
1.30pm – 5.00pm	<b>Continue assessment at respective site</b>	/	/	/	/	/	/

## RSPO P&C PUBLIC SUMMARY

Date / Time	Coverage of assessment / Activity / Site	MZK	IA	MNAJ	MAR	DA	RMN
Day 4 – 14/10/22 8.30am – 12.30pm	<b>Site observation to Samudera Estate</b> <b>P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>• Verification of basic information estate/Metric templates</li> <li>• Confirmation of time bound plan &amp; review of partial certification</li> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>• Land titles user rights</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> <li>• GHG Calculation</li> <li>• New planting</li> </ul>	/	/	/	/	/	/
12.30pm – 1.30 pm	Lunch Break (Friday Prayer)	/	/	/	/	/	/
2.30pm –3.00pm	Continue assessment at respective site	/	/	/	/	/	/
2.30pm –4.00pm	Audit Team Discussion	/	/	/	/	/	/
4.00pm – 5.00pm	<b>Closing meeting at chosen site by Management</b>	/	/	/	/	/	/

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

## RSPO P&C PUBLIC SUMMARY

Attachment 3

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

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

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	SOU 32 Rajawali CU continued to use the internet to disseminate public information relating to company policies, land titles, human rights, FPIC, safety and health plans, pollution prevention plans and the procedure for complaints and grievances. The SDPB website address is <a href="http://www.simedarbyplantation.com/">http://www.simedarbyplantation.com/</a> . For social programmes on education, environment, community and health, etc, Yayasan Sime Darby as the Foundation has expanded its wings from offering scholarships to outstanding and deserving individuals to funding impactful conservation, outreach and development programmes. The SDPB website address <a href="http://www.yayasansimedarby.com/">http://www.yayasansimedarby.com/</a> .
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	Rajawali CU has conducted meeting with the stakeholder to share any new information in appropriate language on RSPO certification, environmental, social, safety and legal requirement applied to all operating units. Evidence of communication is available, and the input was recorded in the SIA and EIA action plan. Furthermore, SOU 32 Rajawali CU continued to use the internet to disseminate public information relating to land titles, human rights, FPIC, safety and health plans, pollution prevention plans and the procedure for complaints and grievances. The SDPB website address is <a href="http://www.simedarbyplantation.com/">http://www.simedarbyplantation.com/</a> .
	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. Management documents relating to environment, social and legal issues, were available to the public except for those prevented by commercial confidential or where disclosure of information would result in negative environmental or social outcomes. The CU has provided relevant information (environmental, social and/or legal) as requested by the relevant stakeholder during the annual stakeholder meeting.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	Sime Darby Plantations Berhad has developed an SOP known as Consultation and Communications procedures documented in the Standard Operating Manual entitled "Procedure for External Communications". A review of the records kept in the internal and external communication files found that the operating units at Rajawali SOU followed the procedures and manuals developed by the company.
	1.1.5 There is a current list of contact and	YES	Stakeholder list FY 2022 was established in both mill and estate on 2/1/2022.



## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	details of stakeholders and their nominated representatives.		Stakeholders, internal & external were included in the list. Nominated representative with contact number and address was sighted.
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	The Rajawali certification unit is subjected to Sime Darby Plantations Sdn Bhd's Code of Business Conduct (COBC). It contains, among others, the following aspects of business conduct: <ul style="list-style-type: none"> <li>• Equal opportunity and non-discrimination</li> <li>• Criminal activities</li> <li>• Harassment and violence</li> <li>• Avoiding conflicts of interests</li> <li>• Guarding against bribery and corruption</li> <li>• How to report a violation.</li> <li>• Anti-money laundering and anti-terrorism financing</li> </ul> The contracts between Sime Darby Plantation Berhad and its contractors contain a clause which requires the contractors to abide by Sime Darby's COBC.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	Among the system in place to monitor compliance with of the COBC include internal audits conducted by the Group Integrity Governance Assurance Department, tender awards to be decided by tender committee to ensure independence and transparency; and vendor COBC developed to outline the standards of behaviour required by Sime Darby Berhad's vendors which includes expectation to uphold human rights. The Vendor COBC applies to all its suppliers, consultants, agents, contractors /service providers who have direct dealings with the Group. All vendors are required to declare their compliance through the Sime Darby Berhad Vendor Integrity Pledge which includes a declaration to eradicate all forms of exploitation, including but not limited to modern day slavery and human trafficking.

### **Principle 2: Operate legally and respect rights**

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

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	YES	In general, SOU 32 continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and SQM sustainability team.
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	YES	The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them. <ul style="list-style-type: none"> <li>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</li> </ul>

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
			<p>were updated by the PIC and approved by the respective Managers.</p> <p>b) The GSQM Department is responsible to track changes and the information was disseminated to all its plantations and Mill department.</p> <p>c) The latest legal register updated by GSQM in 2022.</p>
	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' boundaries within Sime Darby Plantations, area are clearly demarcated with red paint at Palm Tree and there is no planting beyond these legal or authorised boundaries.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	YES	The stakeholder lists for all the units, namely Rajawali POM, Rajawali, Semarak, Bayu and Samudera Estates, were all available and sighted during the surveillance audit. The lists were updated as of October 2022, and they comprise relevant government agencies such as MPOB, Department of Immigration, Department of Environment, Sabah Labour Department) the Indonesian consulate, nearby schools, HUMANA school, nearby villages (Rh Kedi, Rh Seliong, Kg Wawasan Jaya and Kg Nyalau).
	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	<p>Evidence of legal due diligence of all contracted third parties, service providers and labour contractors, were clearly stated in contract between Sime Darby and all contractors.</p> <p>There is addendum contract document between RPOM and the transporters. stated in that (point (iv) – provide access to the RSPO auditors to contractor's operation site(s) and employees whenever deemed necessary. The contractor agrees that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. Contractor also sign the vendor COBD which contain which obliges the contractor to comply with applicable laws related to employment, environment, safety and health, road transport, anti-bribery, anti-slavery, disallowed child labour, human trafficking, etc.</p> <p>All contracts signed with contractors contain a clause on compliance with employment laws, which would include laws related to employment of children and young persons.</p>
	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 Contractors at Rajawali CU signed the Vendor Integrity Pledge in which Vendors undertake to comply with the Vendor COBC. The Vendor COBC in turn, contains provisions which state that Vendors shall not employ anyone under the age of 18 or the applicable minimum legal age in the countries they operate, unless in vocational and/ or formal and structured apprenticeship, educational and training programmes. Based on records available, interviews conducted, and observations made during the audit, there was no evidence of any young persons employed within the CU.
2.3 All FFB supplies from outside the unit of certification are from legal sources.	<p>2.3.1 (C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins.</li> <li>Evidence of the ownership status or</li> </ul>	YES	Rajawali Palm Oil Mill is an Identity Preserved Mill and therefore only receives and processes FFB from its own internal sources namely Bayu Estate, Samudera Estate, Rajawali Estate and other SD group of estates. No FFB supplies from outside the CU.

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	the right/claim to the land, or valid use of land by the grower/smallholder <ul style="list-style-type: none"> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> </ul>		
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	YES	As above.

### **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 Rajawali CU have a yearly budget prepared by the management and approved by top management that indicates the business plan on an annual basis. This annual budget specifies into the details of the expenditures through better and more sustainable management. Some parameters of the projections.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	Rajawali CU have established a long-range replanting programmed until FY 2026. Replanting is planned for the fields older than 25 years, non-performance field (yields), and Ganoderma infection. The replanting program for FY2023 2026 was reviewed during audit.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	The management review meeting was conducted separately by SOU and only involved by mill/estate management only. Among the management review were discussed are: <ol style="list-style-type: none"> <li>Results of internal audits</li> <li>Customer (internal/external) feedback</li> <li>Process performance and product conformity</li> <li>Status of preventive and corrective actions</li> <li>Follow-up actions from management reviews</li> <li>Changes that could affect the management system</li> <li>Recommendations for improvement</li> </ol> Management has transparently addressed the continuous suitability, adequacy, and effectiveness of the requirements for effective implementation of RSPO.

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
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.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	<p>This has been established in the Continuous Improvement Plan 2022 updated in Jan 2022 respectively for all units. This compilation was made with subject to the consideration of the main social and environmental impacts. These include to continue engagement with relevant stakeholders (workers, surrounding communities, government agencies, agencies, suppliers and contractors. Management documents related to environmental plans and impact assessments maintained available. Among the documents were:</p> <ul style="list-style-type: none"> <li>(a) Environmental Aspect Identification (EAI) and Environmental Impact Evaluation (EIE) registers.</li> <li>(b) Environmental Improvement Plan 2022</li> <li>(c) Pollution Prevention Plan 2022</li> <li>(d) Water Management Plan. 2022</li> <li>(e) Waste Management Plan 2022</li> </ul> <p>Action Plan for Social continuous improvement can be seen from efforts carried out by Sime Darby Plantation to enhance workers' rights and welfare. Among them include the roll out of new communication plan at the Rajawali POM which commenced with distribution of video on grievance channel in Sept 2022, <i>Suara Kami</i> poster with contact numbers and QR code for channelling grievances pasted at workers' housing, <i>Suara Kami</i> card distribution to all workers, commencement of Social Dialogues involving management and workers' representatives on workers' welfare, etc, at selected estates (Rajawali, Semarak, Samudera, Estates).</p>
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	YES	The monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template. The auditor already verified and checked the data and figure given was consistent with their database system.
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	Rajawali SOU 32 adopted the following manuals / guidelines for the day-to day operations of the estates and mill. Both the estate and mill operations are 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.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	Both the estates and the mill had an established mechanism to perform checking to ensure consistent implementation of procedures. Sime Darby Plantation Bhd has established a system to monitor the mill and estate operation. The Structured Oil Recovery Assessment (SORA) (for Mill) / Structured Crop Recovery Assessment (SCRA) (for estates) and Planning and Monitoring Unit visited the operating units quarterly. Their reports cover on all aspect of operation. In addition, visit

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
			by agronomist was made yearly. The report focusing on rainfall, yield [performing and underperforming], palm nutrition status, field observation agronomic matters and fertilizer recommendation has been included in the report. All the reports of monitoring were available at estate and mill office for references. Plantation Advisory Department, Performance Monitoring Unit, Quality Management Unit (PSQM) inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Third party visit/inspection was also done as part legal compliance monitoring.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	The implementation of SOPs is monitored on a daily basis by the field staffs and Assistant Managers with overall overview by the Managers. The monitoring is made via supervision and records maintenance. The estates ensure that the contractors are providing PPE, suitable working equipment and machinery.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	YES	There are no new plantings or new operations within Rajawali CU. Nevertheless, each unit has its own EIA and SIA done which have been prepared internally by the Sustainability Department. Details of the EIA and SIA are contained in Indicator 3.4.2 below.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	YES	There are no new plantings or operations within SOU 32 Rajawali CU. However, there were plans and impact assessments relating to environmental impacts carried out. The register covers all estates and mill activities/operation. There is no change of current practices required to mitigate negative effects based on identified impacts for both the mill and estates. However the mill and estates have conducted periodical review on the aspects and impacts identified and evaluated as registered. The mill and estates has continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan and Environmental Management Program. Managers and Assistant Managers of mill and estates were identified as person-in-charge of the programs which were established upon review of the aspect and impact register. It was observed that the reviewing and updating on the registers were made annually if there's no new activity within respective sites. A Social Impact Assessment (SIA) was conducted for SOU 32 Rajawali Operating Units comprising Rajawali POM, Rajawali Estate, Samudera Estate, Bayu Estate and Semarak Estate with the Report available. The SIA were done between 5 - 9 Sept 2016 in collaboration with the Sustainability Dept of Plantation Sustainability Quality Management of SDPB. The SIA was developed with the participation of external and internal stakeholders namely workers representatives, community leaders, workers, related govt agencies, staff, contractors, suppliers.

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	YES	A timetable with responsibilities for mitigation and monitoring was reviewed and updated as necessary. The CU had appointed specific person in charge (PIC) responsible for taking actions on each of the mitigation measures with specific time intervals. Sighted the latest stakeholder's minutes meeting for whole SOU 32 Rajawali & SOU 33 Derawan was conducted on 15/09/2022 at Dewan Komuniti Rajawali was carried out to external and internal stakeholders i.e., estates/mill representative workers, estate management, government agencies, NGO, school, villagers and private sectors (contractors/suppliers and neighboring estates). Evidence of the above stakeholder consultation conducted are available and the stakeholder feedback were recorded in the EAI action plan. So far, no negative impact issues related to environmental have been highlighted during stakeholders meeting.
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are doc and made available to the workers and their representatives where applicable.	YES	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and the procedures were briefed to the workers during their induction course, and also during muster briefings.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	There is evidence that the employment procedures for local and foreign workers enumerated under Indicator 3.5.1 are being implemented, and employment records are maintained, which are viewed during the conduct of audit. All local applications are preceded with a job application form, relevant qualifications and certificates, job interview, records of medical check-up, and the issuance of letter of job offer.
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	YES	The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following; a) Change in work process b) Revision/changes in legislative requirement c) Occurrence of accidents The estates had list of review on HIRARC dated Jan 2022 document no SDP/OSH/HIRARC/01 respectively for the estates and mill. Amendments are summarized in a list detailing dates and reasons for updates.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	Health, Safety and Environment Policy for Sime Darby Plantation Berhad have been established for Upstream and Group. The policy had been communicated to all levels of the organization through morning briefings and also being displayed prominently in Bahasa Malaysia and English on notice boards at mill and estates office and Muster Ground. During interviews with the foreign/local workers and staff during the site visit estates field operation, mill operation, workshop, office compound, workshop, laboratory,

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings																																							
			<p>engine room, boiler house revealed that the employees had been briefed and understood the policy.</p> <p>At Rajawali CU on the OHS management plan has established for 2022 to addressed issues related to hazards and risks, legal register and its requirements for compliance, incident reporting, ERP, chemical safety management, risk management, noise management, contractor safety management, communication, inspection, awareness and competency training, DOSH visit and inspection/audit, etc. Generally, the OSH plans were acceptable.</p> <p>The implementation of OSH plan was monitored by internal audits conducted by OSH officers from SSD Unit. The OSHA plan among others initiated by the estates/mill are as follows;</p> <table><tr><td></td><td>Task</td><td>Activity</td></tr><tr><td>1</td><td>OSH Legal Compliance</td><td>Review all relevant legal compliance</td></tr><tr><td>2</td><td>Emergency Response Plan</td><td>ERP Training</td></tr><tr><td></td><td></td><td>Fire drill</td></tr><tr><td></td><td></td><td>Enforcement Visit</td></tr><tr><td>3</td><td>OSH Management System</td><td>Review documentation</td></tr><tr><td></td><td></td><td>HIRARC review</td></tr><tr><td>4</td><td>Risk Management</td><td>Identify High Risk Area</td></tr><tr><td></td><td></td><td>maintenance</td></tr><tr><td></td><td></td><td>Hygiene Tech</td></tr><tr><td>5</td><td>Accident Investigation/ Reporting</td><td>Accident Investigation</td></tr><tr><td></td><td></td><td>JKKP 8/6 submission</td></tr><tr><td></td><td></td><td>Chemical Register</td></tr></table>		Task	Activity	1	OSH Legal Compliance	Review all relevant legal compliance	2	Emergency Response Plan	ERP Training			Fire drill			Enforcement Visit	3	OSH Management System	Review documentation			HIRARC review	4	Risk Management	Identify High Risk Area			maintenance			Hygiene Tech	5	Accident Investigation/ Reporting	Accident Investigation			JKKP 8/6 submission			Chemical Register
	Task	Activity																																								
1	OSH Legal Compliance	Review all relevant legal compliance																																								
2	Emergency Response Plan	ERP Training																																								
		Fire drill																																								
		Enforcement Visit																																								
3	OSH Management System	Review documentation																																								
		HIRARC review																																								
4	Risk Management	Identify High Risk Area																																								
		maintenance																																								
		Hygiene Tech																																								
5	Accident Investigation/ Reporting	Accident Investigation																																								
		JKKP 8/6 submission																																								
		Chemical Register																																								
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	No	<p>The training program for 2022 covering all aspects of the RSPO Principles and Criteria and other essential operations activities has been established. Training identification matrix has been established with target months for of implementation.</p> <p>However, it has been confirmed that there was no training Plan for contractor. Based on interview and documentation review, some matters related to the aspects of RSPO P&amp;C was not understood by the contractor in terms of payment on the rest day and on PPE distribution to the contractor workers. Therefore, NCR was raised as MAR 01 2022.</p>																																							
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	<p>Rajawali CU SOU 32 had trained their staff, workers and records of training were kept in the RSPO training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue.</p>																																							

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	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.	NO	With reference to the 'Supply Chain Certification Standard (SCCS) training conducted by the Group Sustainability Department; it was found that there were no records of training provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) at the estates. No attendance record for the estates' Weighbridge clerk, which led to inconsistencies of stamping RSPO Certificate No. at WB Tickets from Diversion RSPO certified estate such as Sahu, Damai etc. Thus, Minor NCR MZK 01 2022 has been raised against this Indicator.

### **SUPPLY CHAIN REQUIREMENTS FOR MILLS**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	YES	Rajawali Palm Oil Mill (RPOM) sourced for their FFB only from estates under the same SOU which involve 4 supply bases (estates). They were Rajawali, Bayu, Samudera and Semarak Estates, and SDPB sister estate such as Damai Estate, Sahu Estate, Derawan Estate, and Takau Estate. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 <sup>rd</sup> party certified supply base.	YES	Not Applicable, since RPOM is IP Mill.
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	YES	Projection data available as in Table 4: Projected FFB received and CPO & PK dispatch by Rajawali POM of next reporting period October 2022 to September 2023.



## RSPO P&C PUBLIC SUMMARY

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	YES	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information were: Name: Rajawali Oil Mill Country: Malaysia. Member Category: Oil Mil Core product: Palm Oil
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard.</li> <li>The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</li> </ul>	YES	<p>Rajawali POM had revised their documented procedure title 'Standard operating procedure for 'Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia" effective in Jun 2022.</p> <ul style="list-style-type: none"> <li>The procedure was kept in file RSPO Supply Chain Manual (SCM/RSPO/SD) Appropriate changes were also made in the change to include the new clause Production of ISCC certified waste/residues materials at the mill. Training namely 'Supply Chain Certification Standard (SCCS) Training has been conducted in Aug 2022.</li> <li>The Senior Assistant Manager &amp; weighbridge operator from Rajawali POM had the overall responsibility and authority over the implementation of RSPO supply chain requirement in RSPO Rajawali POM. Interview with sustainability committee member, mill manager, assistant mill manager &amp; weighbridge operator was confirmed they are understood the supply chain requirements.</li> <li>RPOM had continued to implement the procedures it had on receiving and processing of RSPO certified FFBs.</li> </ul>
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>Effectively implements and maintains the</li> </ul>	YES	<p>Rajawali POM 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 requirements.</p> <p>RSPO internal audit was conducted in May 2022, by appointed internal auditors. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 0 nonconformance report (NCR) were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor. The internal audit findings were reported in the management review meeting, conducted in July 2022.</p>

## RSPO P&C PUBLIC SUMMARY

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>standard requirements within its organisation.</p> <ul style="list-style-type: none"> <li>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</li> </ul>		
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	YES	<p>RPOM had continued to receive certified FFBs from the CU's own supply bases as well as certified FFBs from sister estate. There were 4 supply bases (estates) sending certified FFBs to RPOM. They were Bayu Estate, Samudera Estate, Semarak Estate and Rajawali Estate and sister estate such as Damai Estate, Sahua Estate, Derawan Estate, and Takau Estate. The validity of the certificate of the supplier has been checked accordingly. Sighted FFB consignment note for Bayu Estate, Samudera Estate, Semarak Estate and Rajawali Estate and sister estate such as Damai Estate, Sahua Estate, Derawan Estate, and Takau Estate. There was no non-certified FFB received based on the records.</p>
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ol style="list-style-type: none"> <li>The name and address of buyer;</li> <li>The name and address of the seller</li> <li>The leading or shipment/delivery date;</li> <li>The date on which the documents were issued;</li> <li>RSPO certificate number;</li> <li>A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations);</li> <li>The quantity of the products delivered;</li> </ol>	YES	<p>Documented procedures related to sales and goods out were sighted and found adequate. Based on verification during the audit, RPOM has deliver certified materials to end buyer such as Sime Darby Austral KCP for Palm kernel &amp; Sime Darby Oils Bintulu Sdn Bhd for crude palm oil.</p>

## RSPO P&C PUBLIC SUMMARY

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	h) Any related transport documentation i) A unique identification number		
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	YES	There are 2 outsource company for CPO & PK transporter. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training dated 15/9/2022 for transporter contractor was sighted by the auditor.
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	YES	List of stakeholders updated in Oct 2022 with details of all contractors used for transporting RSPO certified oil palm products.
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.
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	Procedure available.

## RSPO P&C PUBLIC SUMMARY

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	YES	Relevant record was maintained for more than 2 years as per Standard operating procedure for "Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia".
	iii ) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	YES	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 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.)	YES	Not applicable RPOM used IP model.
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	RPOM 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).  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	

## RSPO P&C PUBLIC SUMMARY

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	YES	Global Trading & Marketing (GTM) office informed RPOM 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 RPOM were made based on a specific contract.
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	The registration of transaction being carried out by Group Plantation Marketing subordinate. Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).
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. RPOM has not use RSPO corporate logo as well as trademark logo.

## RSPO P&C PUBLIC SUMMARY

### **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 is documented in SDPB's Human Rights Charter incorporates, inter alia, commitment to providing equal opportunities, respecting freedom of association, eradicating any forms of exploitation, respecting community rights and rights of indigenous peoples, protecting rights of children, eliminating violence and sexual harassment. The policy to prohibit retaliation against Human Rights Defenders (HRDs) is documented in SDPB's contained in the Policy on the Protection of Human Rights Defenders dated 25 March 2020. Paragraph 3.3 of this Policy provides protection against violence, threats and retaliation to HRDs and individuals acting in good faith to exercise their fundamental human rights, in the course of their engagement with SDP. These Policies were communicated during external stakeholder meetings on 15 September 2022 which included briefings on SDPB Policies, RSPO/MSPO, HCV, RTE species and others.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	There is no evidence of any use of violence or the instigation of violence within the Rajawali SOU. This was further verified during interviews held with external stakeholders and security personnel.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	YES	The system used by Rajawali CU in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Procedures for handling Social Issues". Each operating unit each has its own Internal and External Complaint Books. The Internal Complaint Book was used for employees to lodge complaint pertaining to their houses, and there is evidence that the complaints were resolved in a timely and appropriate manner. The external book was reviewed and found no complaints against the CU. Both External and Internal Complaint Books are kept at the AP post at the Main Gate.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	Rajawali CU ensures that affected parties including illiterate parties understand the procedures by distributing grievance procedure videos as well as posters and presentation materials in pictorial/infographics format and scanning a QR code.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is	YES	The Rajawali SOU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. Verified during the audit were complaint received from workers about house defects, date of action taken to rectify the defects which was usually within 48 hours of complaints being lodged, and acknowledgement by the complainants.

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	available and communicated to relevant stakeholders.		
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	YES	Mechanism available. Paragraph 7 of Appendix 5 Sustainable Plantation Management System, Flowchart and Procedure on Handling Social Issues Version 1, states upon failure of negotiation process involving estate management, representatives from the disputed parties, zone heads, third parties and stakeholders, legal proceedings may follow. Paragraph 8 of Appendix 3 of the same document on procedures Handling Land Disputes states that “further negotiation processes may involve independent third parties such as representatives from the Land Office or from other NGOs.”
4.3 The CU contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	YES	Contribution of Rajawali CU to local communities were evident. Reviewed during audit.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	YES	It is confirmed that, the land was previously belonged to Austral Enterprise Bhd. The land was next bought by Golden Hope Plantation Sdn Bhd before its merger with Sime Darby in 2008. Original copies of Land titles were kept at SDPB headquarters while Rajawali Mill and Estates maintained photocopies of the relevant land titles.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	It has been verified that the land previously belonged to Austral Enterprise Bhd. The land was later bought by Golden Hope Plantation Sdn Bhd before its merger with Sime Darby in 2008. The audit team had confirmed that there were no land issues related to previous owners. No land was encumbered by customary rights or dispute from any stakeholder at Rajawali CU.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities’ and gender	YES	However, there was one issue regarding the land claim at Rajawali Estate. The squatters in Rajawali Estate started during Messrs. Anib Plantation Sdn Bhd (APSB) era. It occupies approximately 3,291 ha. In 1993, the number of reported squatters was 471 and increased to 760 in 1998. The company had taken a lot of time and effort to resolve and compromised on this issue which included offering them a 5-acre plot to each squatter. Details in the confidential version of this report. Nevertheless, at the time of this audit, it has been confirmed by the local communities

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.		Heads that there was no new land claim made by the Indigenous people other than the disputed land mentioned above, which are to be released.
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	YES	
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	YES	
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	YES	As above. .
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	
	4.4.5 (C) Evidence is available to show that communities are	YES	



## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.		
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	As above.
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	YES	Based on Social Impact Assessment (SIA) Report for SOU Rajawali and land title, there was no new plantings established on local peoples' land. It has been verified that the land is legitimately owned by Sime Darby SOU Rajawali since 2008. During this Audit, the audit team has confirmed that there were no land issues related to previous owners.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	YES	As above, hence this Indicator was not applicable.
	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	YES	

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.		
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	YES	As above, hence this Indicator was not applicable.
	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	
	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	
	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	

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System document entitled "Procedures for Handling Boundaries Disputes". In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	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.
	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 Rajawali SOU 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 compensated for any agreed land acquisitions and relinquishment of	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System document entitled "Procedures for Handling Boundaries Disputes". In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place	YES	There was no issue regarding compensation (monetary or otherwise) to villagers, local community and neighbouring estate, and no new planting. This Indicator is not applicable.

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
rights, subject to their FPIC and negotiated agreements.	and documented and made available to affected parties.		
	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 Rajawali SOU, and no new planting.
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	YES	It has been verified that the land is legitimately owned by Rajawali SOU, Sime Darby since 1980. 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. The audit team had confirmed that there were no land issues related to previous owners.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	YES	The audit team has also interviewed the village representative from adjacent local community and confirmed that there was no land conflict at Rajawali SOU.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and	YES	As above.

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	land use rights, these claims will be settled using the relevant requirements.		
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	YES	Land conflict is not present in the area of the unit of certification.

### **Principle 5: Support smallholder inclusion**

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	YES	Rajawali Palm Oil Mill was an Identity Preserved Mill and therefore only receives and processes FFB from its own internal sources namely Samudera Estate, Bayu Estate, Rajawali Estate, Semarak Estate and other SD group of estates. No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	
	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	YES	

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	applicable.		
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	It is evident that contracts entered into with FFB and CPO transporters are fair, legal and transparent. Among others, the contracts are dated, with clear provisions on contract duration, scope of services, payment of fee, obligation and undertaking of parties, provisions related to default and termination, rights and obligations upon termination, clause on dispute, etc. Annex 2 and 3 of the contracts specify schedule of transportation rates and transport rate adjustment mechanism, respectively.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	Contracts with suppliers contain a provision that payments would be made within one month of invoice. Evidence is available at the Rajawali Palm Oil Mill that a CPO transporter, invoice was paid within the 30-day timeframe. Interviewed vendors by the Auditor team confirmed the same.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	Weighing equipment at the POM was verified through De Metrology Sdn Bhd, the inspection was done on in May 2022.
	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	In SOU Rajawali, Fresh Fruit Bunches are supplied from SDPB owned estates and diversion crop from sister SOU such as Derawan SOU which are certified to RSPO. Hence, there is no third-party FFB sent to the mill. However, it has been noted that the SOU Rajawali has invited nearby smallholders to attend the Stakeholder meeting scheduled in Aug 2022 to promote on RSPO/MSPO certification.
	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	No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.
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	No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity,	YES	

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).		
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	There are no Scheme Smallholders for Rajawali CU, and therefore this Indicator is not applicable.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	Rajawali Palm Oil Mill was an Identity Preserved Mill and therefore only receives and processes FFB from its own internal sources namely Samudera Estate, Bayu Estate, Rajawali Estate, Semarak Estate and other SD group of estates. No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.

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

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

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	YES	A Policy on equal opportunities and non-discrimination exists in SDP's Human Rights Charter 2020. The Company would promote diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. It also states that the Company will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. Interviews conducted with workers confirmed the implementation of this Policy.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Review of the contracts entered with recruitment agents, it has clearly stated that no recruitment fee is payable by migrant workers. Interviews conducted with migrant workers from Indonesia also confirmed that there is no discrimination and that they had not paid any recruitment fees.

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	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	Rajawali SOU was able to demonstrate that recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness appropriate for the job. Among the documents that are needed when applying for a job are job application form, identification documents, relevant certificates, medical test results. Interview of candidates will be done by Manager and the Assistant Managers where an evaluation form is filled up to determine the suitability of the candidate. These documents are contained in the workers' personal files.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	YES	Based on interviews with female workers, Estate Health Assistants and Medical Assistant, there was no evidence that pregnancy tests are being conducted as a discriminatory measure. Should a worker whose job comes into contact with chemicals, e.g., sprayers, or lab assistants become pregnant, she would immediately be re-assigned to an alternative job employment that doesn't involve contact with chemicals. This was verified accordingly.
	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	A gender committee is in place at the Mill all the Estates within Rajawali CU. Each gender committee comprise female employees of all levels, including wives of male employees. Among the activities carried out by the Gender Committee include awareness briefings on sexual harassment, reproductive rights, domestic violence, how to lodge complaints and opportunities to improve members' income.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	Based on letters of job offer and monthly pay slips reviewed, evidence is available that workers receive equal pay for the same work scope. Sampled were payslips for Feb, April and Sep 2022 for male and female mandores and general workers at Rajawali, Bayu, Semarak, Samudera Estates where they both earn the same rate of pay for the same type of work.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	YES	Applicable labour laws, documentation of pay and conditions are contained in in employment contracts (for migrant workers), letters of employment offer (for Malaysian workers). The contracts contain conditions of pay and terms of employment related to contract duration, regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. The employment contracts are signed in dual language, namely English/Bahasa Malaysia.
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give	YES	The employment contracts signed between the estate/mill management contain employment and payment terms and provisions covering duration of employment, place of work, salary, working hours, medical, accommodation, SOCSO, transportation, public holidays, sick leave, annual leave, mutual termination of service, etc. These are all in compliance with the provisions of the Sarawak Labour Ordinance. The pay slip is the document that give accurate information on compensation for all work performed. It contains the following information: employee name, IC/passport, gang, month of pay, pay description, (basic, price bonus, productivity incentive, allowances,



## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	accurate information on compensation for all work performed. This includes a form of record for work done by family members.		deductions for SOCSO, EIS, KSWP, total income for the month, total deductions, net pay. None of the workers have family members working to help them with their work.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	YES	Generally, there was evidence that regular working hours, deductions, sickness, holiday entitlement, maternity leave, are observed in accordance with the Sarawak Labor Ordinance. This was verified from the workers' employment contracts, punch cards, payslips and interviews with the workers themselves. Workers are also entitled to at least 30 minutes' rest after 5 hours of work. Estate Health Assistants/Medical Assistant interviewed during the audit also confirmed that workers with medical certificates are given a paid medical leave, and female workers are given 3 months paid maternity leave.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	YES	Evidence is available that Rajawali CU provide adequate housing and facilities to its Mill and Estate employees in accordance with the requirements of the national laws, which is the Workers' Minimum Standard of Housing and Amenities Act 1990. Houses are provided rent free with free water and electricity. Each house generally has 3 rooms and accommodate between 1 to 5 workers, and are generally in a good state of repair. Visits made during the audit to the workers' housing also confirmed that the houses are in a good state of repair and the surrounding areas are clean. All workers interviewed affirmed the same.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	All units within Rajawali CU have their own canteen/grocery store which sell basic items such as eggs, flour, rice, cooking oil, vegetables, onions, frozen food such as fish, meat, etc. Rajawali Mill has four shops/canteens. Workers' access to their daily needs are from these shops. Items seen in the stores are adequate, clearly labelled and have not expired. To ensure prices of items sold are reasonable, prices of items sold in several supermarkets in Bintulu were compiled by SQM and referred to as a basis for price comparison and monitoring.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.	YES	All sampled workers receive at least minimum wages based on Minimum Wages Order Amendmend (May) 2022 which came into effect on 1 May 2022. Rajawali CU has also carried out the calculation of prevailing wages and in-kind benefits. The calculation took into account basic pay, paid leave, incentives, mobile phone top-ups, medical benefits, rice, rental, maintenance and utilities, medical costs, transport, utilities, transport allowance, field and playground maintenance.

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	<p><b>PROCEDURAL NOTE:</b> A written policy with specific implementation plan, committing to payment of a “decent living wage” is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following:</p> <ul style="list-style-type: none"> <li>• An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment.</li> <li>• The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation</li> </ul> <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>		<p>The prevailing wage calculated for Rajawali CU are: Malaysian workers: RM 1,973.52 Migrant workers: RM 2,100.75 The DLW calculation is higher than minimum wages of RM1,500 per month.</p>
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	All workers employed within Rajawali certification unit are fulltime employees with no casual, temporary and day labour.

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
6.3 The CU 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 assoc. 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 recognizing freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	YES	Recognition of freedom of association is available in SDP's Human Rights Charter 2020. Paragraph 3.2.4 states commitment to respect freedom of association, respecting the rights of employees to form and join unions and bargain collectively. This Policy is displayed at the notice boards and explained to workers accordingly.
	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	Although there are no trade unions in Sabah, it was evident that the workers have elected by way of an election, their own workers' representatives to represent them on various issues.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	YES	Based on interviews held with workers, evidence was available that no management interference was present during the election of workers' representatives at Rajawali CU.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	YES	The formal Policy on protection of children and non-employment of children is contained in paragraph 3.3 of SDP's Human Rights Charter 2020. Paragraph 3.3.1 states that the Company would eradicate child labour in its supply chain and would not employ anyone below the age of 18 years.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	YES	Documentary evidence is available that minimum age requirements are met. This is based on workers' check roll list and copies of their passport/NRIC details. Based on workers' NRIC and passports, all workers were at least 18 years old when employed. Observations made during audit visits also did not reveal the presence of any workers below the 18 years.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	There was no evidence of the employment of any young persons within Rajawali CU.

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	YES	The Policy against Child Labour is available in SDPB's Human Rights Charter 2020. This Policy was communicated to its internal and external stakeholders as evidenced by minutes of stakeholder meetings and mill & estates' trainings.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	The formal Policy on prevention of sexual and other forms of harassment and violence exists in SDP's Human Rights Charter 2020. This Policy is displayed at all main notice boards throughout the CU. Communications on this Policy were also done during Gender Committee meetings sampled at all Estates in Rajawali CU. Among the discussions included forms of sexual harassment, complaint procedure, responsibility of gender representatives in handling related complaints, etc. Based on interviews conducted with workers (both men and women) and members of the Gender Committees, there is awareness of this Policy, and the workers also confirmed that it is being implemented and they have not encountered any incidence of violence or sexual harassment.
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	YES	The formal Policy to protect the reproductive rights of all, especially of women exists in SDP's Human Rights Charter 2020. This Policy is displayed at all main notice boards throughout the CU. Communications on this Policy were also done during Gender Committee meetings sampled at all estates in Rajawali CU. Based on interviews conducted with female workers at all units within Rajawali CU as well as with the Gender Committee members, this Policy is being implemented as they confirmed that their reproductive rights are assured i.e., freedom to plan their own family, paid maternity leave, right to take time off to nurse their child, and pregnant female workers are given light work.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	The formal Policy to protect the reproductive rights of all, especially of women exists in SDP's Human Rights Charter 2020. This Policy is displayed at all main notice boards throughout the CU. Communications on this Policy were also done during Gender Committee meetings sampled at all estates in Rajawali CU. Based on interviews conducted with female workers at all units within Rajawali CU as well as with the Gender Committee members, this Policy is being implemented as they confirmed that their reproductive rights are assured i.e., freedom to plan their own family, paid maternity leave, right to take time off to nurse their child, and pregnant female workers are given light work.

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	YES	A grievance mechanism which respects anonymity and protects complainants is in place at the CU as per the Sime Darby Gender Committee Handbook 1st Edition 2014. Additionally, SDP has also established Suara Kami. According to the SOP for Suara Kami Helpline, this is an alternative independent third-party worker grievance channel with multi-languages and multi-interfaces (toll-free number, SMS and facebook) that assures worker confidentiality unless personal details are required, where in such situations, consent will be sought by the system receiver.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty to the workers for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	YES	All units within Rajawali CU were able to demonstrate that all sampled workers have entered into employment voluntarily. Foreign workers (harvesters, sprayers, manurers, mill workers etc), have not been subjected to contract substitution and no discriminatory practices against foreign workers was observed.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	Employment procedures for foreign workers exists under SOPP Workforce Management Unit, which provides the procedures for recruitment, selection and hiring. A post-arrival briefing is also given, in particular on the contents of their employment contracts, safety, benefits, etc. Based on observations and interviews of foreign workers (harvesters, sprayers, mill workers), there is no evidence of contract substitution and no discriminatory practices against foreign workers. A post-arrival briefing is also given, in particular on the contents of their employment contracts, safety, benefits, etc.
6.7 The unit of certification ensures that the working environment under its	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare	YES	The Estate / Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Managers subsequently assigned duties of OSH coordinator to the Assistants or Healthcare Assistant for the down line implementation of OSH practices in the estates and mill. All identified Executives were officially given a letter for such an appointment. Records of regular meetings between the

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
control is safe and without undue risk to health.	are discussed at these meetings, and any issues raised are recorded.		responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. Occupational Safety Health (OSH) Committee has been established together. The OSH committee organization chart for 2022 was available. The Estate/Mill Managers are the chairman, and the Mill Engineers/Assistant Managers are the secretary. OSH Committee meetings were held quarterly. Minutes of the meeting reviewed.
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	YES	<p>The procedures for accident and emergencies have been established. There is formation of ERP Team &amp; ERP for all the identified incidences. In addition the procedures have been summarized in a chart flow form and displayed for information of all employees in the estate. They includes emergencies relating fire, chemical spillage, flood and accident at work place.</p> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SSD and amended to tailor to the situation differences in the estates and mill.</p> <p>ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The training are conducted by an accredited or qualified organization who can demonstrate their suitability to provide training.</p> <p>The trained personnel for the First Aid were among the employees working as field staff/mandores. The first aid boxes were available at various points in the estate office, workshop, and store. The estate distributed the first aid box to the mandores and brought along to the field during operations. In addition, there are also first aid boxes kept in the office, store and workshops.</p> <p>Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. Form JKPP 8 for 2021 at Rajawali Estate was submitted to DOSH in timely manner i.e., in Jan 2022 via MyKKP System.</p>
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	YES	<p>The mill and estates issued PPE to its employees for their protection at workplace. Records of PPE issued are maintained individually to all employees. PPE issued to the workers is safety helmets, safety shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded. During the site visit the staff/workers were noted to be equipped with their proper attire &amp; PPE. Acknowledgement of receipt was recorded. Based on the HIRARC carried out at the estates and mill the PPE types for the various activities has been identified and implemented.</p>

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	YES	Both the Estates and Mill in the Rajawali CU uses SOCSO for the coverage for the local and foreign workers.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office.

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

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

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	Rajawali SOU 32 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>Antigonon leptopus</i> and <i>Turnera subulata</i> and for rhinoceros beetles is by using pheromone traps. Rajawali SOU 32 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.
	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. 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 gov. authorities.	YES	Rajawali SOU 32 continued to use the Sime Darby Plantation Berhad's policy of no open burning ever since Sime Darby Plantation Berhad's practised zero burning. In the 2019, 2020 & 2021 replants visited during the audit in all estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. Furthermore, there had been no serious outbreak of pest attacks in all the Estates.

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
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 the use of pesticides had been documented. The use of selective products that are specific to the targeted pest, weed or disease had been defined in <ul style="list-style-type: none"> <li>• Agriculture Reference Manual (ARM),</li> <li>• Estate Quality Management System (EQMS) Manual,</li> <li>• Sustainable Plantation Management System Manual (SPMS),</li> <li>• Plantations Quality Management System (PQMS) standard operating manual.</li> </ul> Rajawali SOU 32 continued to use agrochemicals based on its Agricultural Reference Manual (ARM) Section 15 and 16, SSOP and Pictorial Safety Standard Book (PSS) where written justifications had been provided for various fields operations. The Manual has included a chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs. All the 4 estates confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.
	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	Rajawali SOU 32 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. All the estates had documented programs for spraying pesticides and for rat baiting. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	Rajawali SOU 32 were committed to minimise the usage of agrochemicals by implementing Integrated Pest Management (IPM) plans. Blanket spraying was not practised by this SOU and soft grasses maintained in the field. Barn owls was encouraged, as indicated by Barn Owl census records, to reduce the use of rat baits. As part of the IPM plans, the management of all the 4 estates had established beneficial plants ( <i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> , and <i>Turnera subulata</i> ) nurseries for continuous planting in order to attract natural predators and thus reducing the use of pesticides. EFB applied at replants was applied in single layers and is not dumped in large amounts to prevent breeding of Rhinoceros Beetles. However, in replants prophylactic spraying using diluted cypermethrin for immature palms in zero burning of oil palm to oil palm replanting was carried out against Rhinoceros Beetles as per SOP.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	All the 4 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 Reg. 2000. From the review of the chemical register, it was noted that all pesticides used were of Class II, III & IV. There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. The use of paraquat had been banned in all Sime



## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
			Darby Plantation Berhad estates since 2006.
	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	Rajawali SOU 32 were committed by not using pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat. The chemical store and chemical list indicated the 4 estates had none of the chemicals. The use of <i>paraquat</i> was banned in all Sime Darby Plantation Berhad's estates since 07/11/2006. Most pesticides used were Class II, III & 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. The chemical used in the estates were recorded in chemical registers which were updated in July 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 check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. The Estates had used only Class III and Class IV chemicals. Hence, the need for a judgement of the threat assessment does not apply on the Rajawali SOU.
	7.2.5b Why there is no other alternative which can be used.	YES	As above. The need for other alternatives does not apply on the Rajawali SOU.
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES	As above. The need to verify why there is no other less hazardous alternative does not apply on the Rajawali SOU.
	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 check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need to limit the negative impacts of the application does not apply on the Rajawali SOU.
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	As above. The need to estimate the time scale of the application and steps taken to limit application to the specific outbreak does not apply on the Rajawali SOU.
	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	YES	Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the pesticide. The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involve and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that SDS are available at all sites during the audit. The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149).

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	show evidence of regular updates on the knowledge about the activity they carry out.		
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	The storage of pesticides at Rajawali SOU 32 was found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorized personnel i.e., storekeeper. The stores in estate and mill were ventilated (equipped with exhaust fans). All the chemicals were arranged/segreated according to the type. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OHS CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were found available in Bahasa Malaysia language understood by workers or explained carefully to them by a plantation management official at operating unit level.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	Standard Operating Procedure Scheduled Waste Disposal of empty pesticide containers were carried out as per established procedures. Triple rinsing procedures was continually implemented for empty pesticide containers and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Records on usage and disposal were well recorded and documented.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	YES	Aerial spraying is not a practice in Rajawali SOU 32 There was no evidence to show that such a method being used in the 4 Estates.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	The medical surveillance was performed in 3 <sup>rd</sup> party clinic and checked by OHD registered practitioner. All workers involved with pesticides were sent for testing.
	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 workers underage of 18 and pregnant or breast-feeding women.
7.3 Waste is reduced,	7.3.1 A waste management plan which includes reduction, recycling, reusing, and	YES	SOU 32 Rajawali Palm Oil Mill and all the 4 estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2022 were established to mitigate and

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
recycled, reused and disposed of in an environmentally and socially responsible manner.	disposal based on toxicity and hazardous characteristics, is documented and implemented.		control the identified wastes and source of pollution. All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2022. Generally, the scheduled wastes were disposed through licensed vendors, organic wastes were disposed through estate landfill and recyclable wastes were sent to recycle centers. Besides, industrial waste such as POME, EFB, boiler ash, decanter cake and scrap metal were applied to field application, monitoring of POME and sell to third party.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	In Rajawali POM and the estates in SOU 32, procedure Scheduled Wastes (Hazardous Waste) Management has been established. Management and disposal of wastewater 2022 has been established compiled by Assistant Engineer/Assistants/Staff. Waste Management Plan 2022 has been established prepared by QA and verified by the Assistant Engineer/Assistants/Staff. The CU scheduled waste is disposed to 3 <sup>rd</sup> party registered with DOE.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal. Monitoring is done weekly in both domestic waste collection areas.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	Rajawali SOU 32 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. 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 periodic tissue/foiar sampling while soil samplings were carried out on a 5-year cycle basis. Fertiliser application program was monitored using records like program sheets, bin cards, Field Cost book and Manuring Structured Block Supervision (MSBS) forms.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	Periodic tissue/leaf and soil sampling were carried out in Rajawali SOU 32 to monitor changes in nutrient status. Annual foliar sampling for the nutrients N, P, K, Mg, Ca & B had been carried out respectively while soil samplings were carried out on a 5-year cycle basis. 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 fertilisers applied in 2021 were completed.
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	YES	Rajawali SOU 32 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.

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings																																																												
	7.4.4 Records of fertiliser inputs are maintained.	YES	Fertiliser application program was monitored using records like manuring master plan, program sheets, bin cards, field cost book, manuring audits by Planning and Monitoring Department under Upstream Department from headquarters. Records of programs and applications of fertilisers were made available to auditors.																																																												
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	<p>The Soil maps are prepared in January 2011 by Sime Darby Plantation Berhad <i>Research and Advisory Dept (Precision Agriculture Unit)</i>. The soil series were as follows:</p> <table><tr><th>Bayu Estate</th><th>Samudera Estate</th><th>Semarak Estate</th><th>Rajawali Estate</th></tr><tr><td>Bekenu</td><td>Bekenu</td><td>Derawan</td><td>Semarak</td></tr><tr><td>Semarak</td><td>Semarak</td><td>Semarak</td><td>Nyalau</td></tr><tr><td>Bedup</td><td>Derawan</td><td>Bekenu</td><td>Bedup</td></tr><tr><td>Derawan</td><td>Bedup</td><td>Nyalau</td><td>Derawan</td></tr><tr><td>Bukit tuku</td><td>Nyalau</td><td>Bukit tuku</td><td>Gong Chenak</td></tr><tr><td>Nyalau</td><td>Lunas</td><td>Gong chenak</td><td>Gali</td></tr><tr><td>Sibuga</td><td></td><td>Rasau</td><td>Tebok</td></tr><tr><td>Gong chenak</td><td></td><td>Lunas</td><td>Bekenu</td></tr><tr><td></td><td></td><td>Bedup</td><td>Marang</td></tr><tr><td></td><td></td><td>Unclassified</td><td>Sibuga</td></tr><tr><td></td><td></td><td></td><td>Durin</td></tr><tr><td></td><td></td><td></td><td>Saratok</td></tr><tr><td></td><td></td><td></td><td>Rasau</td></tr><tr><td></td><td></td><td></td><td>Unclassified</td></tr></table>	Bayu Estate	Samudera Estate	Semarak Estate	Rajawali Estate	Bekenu	Bekenu	Derawan	Semarak	Semarak	Semarak	Semarak	Nyalau	Bedup	Derawan	Bekenu	Bedup	Derawan	Bedup	Nyalau	Derawan	Bukit tuku	Nyalau	Bukit tuku	Gong Chenak	Nyalau	Lunas	Gong chenak	Gali	Sibuga		Rasau	Tebok	Gong chenak		Lunas	Bekenu			Bedup	Marang			Unclassified	Sibuga				Durin				Saratok				Rasau				Unclassified
	Bayu Estate	Samudera Estate	Semarak Estate	Rajawali Estate																																																											
Bekenu	Bekenu	Derawan	Semarak																																																												
Semarak	Semarak	Semarak	Nyalau																																																												
Bedup	Derawan	Bekenu	Bedup																																																												
Derawan	Bedup	Nyalau	Derawan																																																												
Bukit tuku	Nyalau	Bukit tuku	Gong Chenak																																																												
Nyalau	Lunas	Gong chenak	Gali																																																												
Sibuga		Rasau	Tebok																																																												
Gong chenak		Lunas	Bekenu																																																												
		Bedup	Marang																																																												
		Unclassified	Sibuga																																																												
			Durin																																																												
			Saratok																																																												
			Rasau																																																												
			Unclassified																																																												
	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	<p>Rajawali SOU 32 had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ul style="list-style-type: none"><li>• Slope &amp; River Protection Policy</li><li>• Buffer Zone &amp; 25 degree slope and in item 8 Section 4</li><li>• Land Preparation for Terracing in ARM Manual.</li></ul> <p>It was observed that no replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the SOU. And, practices to minimise and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction of terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in some mature areas. The cover crop <i>Mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>Nephrolepis biserrata</i> in the inter rows were sighted during the visit. Topography maps showed that the slopes in the estates were as</p>																																																												

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings																																			
			follows. <table><tr><th>Topography</th><th>Bayu</th><th>Rajawali</th><th>Samudera</th><th>Semarak</th></tr><tr><td>0-2</td><td>5.46</td><td>10.3</td><td>4.53</td><td>11.29</td></tr><tr><td>2-6</td><td>29.85</td><td>25.79</td><td>28.09</td><td>32.00</td></tr><tr><td>6-12</td><td>41.38</td><td>29.66</td><td>40.52</td><td>29.98</td></tr><tr><td>12-20</td><td>19.92</td><td>20.06</td><td>21.5</td><td>17.00</td></tr><tr><td>20-25</td><td>2.34</td><td>5.82</td><td>3.31</td><td>3.88</td></tr><tr><td>&gt; 25</td><td>1.05</td><td>8.37</td><td>2.05</td><td>5.85</td></tr></table>	Topography	Bayu	Rajawali	Samudera	Semarak	0-2	5.46	10.3	4.53	11.29	2-6	29.85	25.79	28.09	32.00	6-12	41.38	29.66	40.52	29.98	12-20	19.92	20.06	21.5	17.00	20-25	2.34	5.82	3.31	3.88	> 25	1.05	8.37	2.05	5.85
Topography	Bayu	Rajawali	Samudera	Semarak																																		
0-2	5.46	10.3	4.53	11.29																																		
2-6	29.85	25.79	28.09	32.00																																		
6-12	41.38	29.66	40.52	29.98																																		
12-20	19.92	20.06	21.5	17.00																																		
20-25	2.34	5.82	3.31	3.88																																		
> 25	1.05	8.37	2.05	5.85																																		
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	Rajawali SOU 32 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.	YES	Rajawali SOU 32 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 Rajawali SOU 32.																																			
	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 Rajawali SOU 32.																																			
	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 Rajawali SOU 32 continued to use Soil surveys and topographic information guide in the planning of drainage and irrigation systems, roads and other infrastructure.																																			
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	YES	Auditors have verified through checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to all four estates, it is confirmed that there were no new planting or new development of areas on peat at Rajawali SOU 32 Estates.																																			
	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:	YES	Areas of peat within Rajawali SOU 32 were appropriately inventoried, documented and reported to RSPO Secretariat on 14 <sup>th</sup> November, 2019.																																			

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).		
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	<p>The monitoring of peat soil subsidence was guided by the following;</p> <ul style="list-style-type: none"> <li>a) Item 2 – Optimal Water Levels for Coastal/Peat Soil and</li> <li>b) Item 4 – Water-table monitoring of Chapter 10 of Sime Darby Agricultural Reference Manual – Water Management in Coastal and Peat Plantings.</li> <li>c) Guidance in the “Peat Subsidence Gauge Installation SOP” dated 14/03/2016.</li> </ul> <p>The estates monitored water levels using water level markers in main/collection drains and water tubes for ground water levels. Records relating to peat management as sampled verified for Rajawali Estate are as follows;</p> <ul style="list-style-type: none"> <li>a) Map showing location of peat subsidence pole (PSP) and Piezometer.</li> <li>b) Peat Subsidence Pole (PSP) Monitoring Records Depth(cm)</li> <li>c) Piezometer Monitoring Records Depth(cm)</li> </ul>
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	<p>The water and ground cover management programme are documented in the Sime Darby Agricultural Reference Manual (Water Management in Coastal and Peat lands). Individual estates had their respective water management plan mainly to monitor among others the following;</p> <ul style="list-style-type: none"> <li>a) Monitor the quality of main water inlet/outlet for pollutants from estate's operations.</li> <li>b) Contingency during water shortage.</li> <li>c) Field water management - side pit construction</li> <li>d) Adequate field drains</li> <li>e) Reuse/recycle waste water.</li> <li>f) Peat soil water management</li> </ul>
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit	YES	<p>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:</p>

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings															
	<p>for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>		<table><tr><th>Class</th><th>Status</th><th>Remark</th></tr><tr><td>1</td><td>Good</td><td>Excess water in the field can be drained by gravity even during the highest tide and/or during the wet periods.</td></tr><tr><td>2</td><td>Moderately Good</td><td>Excess water in the field can be drained by gravity &gt;50% of the tidal cycle, sometimes with the help of bunds and flap-gates and/or where water in the plantation can be drained during the wet period before the oil palms start to suffer.</td></tr><tr><td>3</td><td>Poor</td><td>Excess water in the field can be drained by gravity &lt;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.</td></tr><tr><td>4</td><td>Very Poor</td><td>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.</td></tr></table> <p>This is not applicable since the peat soil in Rajawali Estate is only 9.29 Ha, as supported by the soil maps of the estate.</p>	Class	Status	Remark	1	Good	Excess water in the field can be drained by gravity even during the highest tide and/or during the wet periods.	2	Moderately Good	Excess water in the field can be drained by gravity >50% of the tidal cycle, sometimes with the help of bunds and flap-gates 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.	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.
Class	Status	Remark																
1	Good	Excess water in the field can be drained by gravity even during the highest tide and/or during the wet periods.																
2	Moderately Good	Excess water in the field can be drained by gravity >50% of the tidal cycle, sometimes with the help of bunds and flap-gates 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.																
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.																
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	YES	Rajawali Estate continued to manage peat area according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) 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	There were no unplanted and set-aside peatlands in the managed area in Rajawali CU and 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).															

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings									
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	<p>SOU 32 Mill /estates had established its Water Management Plan 2022 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <p>a) Implementation of rain water harvest, b) Construction of water gate and scheduled water pumping for effective management of field drains and field water level. c) daily monitoring of bund / scheduled maintenance d) Establishment of <i>mucuna bracteata</i> to prevent erosion, e) Side drain at field road to control water, frond stacking, f) Enhancement of ground vegetation at bare ground area.</p> <p>The contingency plan during water shortage</p> <table><tr><td></td><td>Incident</td><td>Action steps</td></tr><tr><td>1</td><td>Water shortage/ prolonged dry season</td><td>To obtain water from local authority/Mill catchment/LAKU To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP</td></tr><tr><td>2</td><td>Severe water pollution/ Contamination</td><td>To obtain water from local authority To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP</td></tr></table> <p>(LAKU - Lembaga Air Kawasan Utara)</p>		Incident	Action steps	1	Water shortage/ prolonged dry season	To obtain water from local authority/Mill catchment/LAKU To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP	2	Severe water pollution/ Contamination	To obtain water from local authority To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP
	Incident	Action steps										
1	Water shortage/ prolonged dry season	To obtain water from local authority/Mill catchment/LAKU To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP										
2	Severe water pollution/ Contamination	To obtain water from local authority To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP										
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	Based on stakeholder consultation with local communities and field visit, there was evidence that the CU does not restrict access to clean water or contribute to pollution of water used by communities. In order to ensure supply of clean drinking water to workers treated water sampling was carried out by monthly basis. Drinking water quality has been monitored by Sime Darby Plantation Research Sdn. Bhd. Results from analysis were showed all the parameters within the limits. Based on the result, water quality monitoring is generally within Class IIB of NWQSM at all monitoring points. The organization had addressed the nonconformance water quality parameter. The organization still in further monitoring the effectiveness on the action taken once next water sample report be conduct.									
	7.8.1b Workers have adequate access to clean water.	YES	As verified at Rajawali CU facilities for workers and through interview with workers, all workers have obtained adequate access to treated clean water. Cleanliness of drinking water supplied to worker was ensured by carrying water analysis. Drinking water quality has been monitored by Sime Darby Plantation Research Sdn. Bhd. by monthly basis. Based on the result, water quality monitoring is generally within Class IIB of NWQSM at all monitoring points.									



## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings												
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	YES	The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The signboards were displayed accordingly at the site where applicable. Samples are taken from the mill and estates for detection of any pollution arising from the mill and estates activities. Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses.												
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially BOD, is regularly monitored.	YES	Based on Jadual Pematuhan RPOM disposed effluent to water discharge to outlet of Sg Singrok. Sighted quarterly report has been submitted to DOE by quarterly basis. All parameters tested complied with regulatory standards.												
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	The mill processing water are obtained from water catchment adjacent to the mill complex. The water usage monitoring in m3 is made monthly. The usage in 2021 was slightly higher water usage noted, due to the proportionate reduction in volume of FFB being processed. There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc.												
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	The plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented. Record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement and has been incorporated into the Environmental Aspect and Impact activities report 2022. The document was reviewed/updated on Jan 2022. There is no genset operator applied at all operating unit. Mostly electricity supplied at operating unit via SESCO (Sarawak Energy). Rajawali CU, showed evident that they are compiling the data by monthly basis and document it for further action to improve on their efficiency of using the renewable and non-renewable energy.												
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	YES	<p>The CU had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. For input FY 2021, the report sends to RSPO on 12/10/2022. The input data was verified and the following were determined:</p> <table border="1"> <thead> <tr> <th>Description</th><th>tCO<sub>2</sub>e/tProduct</th><th>Production</th><th>t/yr</th></tr> </thead> <tbody> <tr> <td>CPO</td><td>1.35</td><td>FFB Processed</td><td>129,149.86</td></tr> <tr> <td>PK</td><td>1.35</td><td>CPO Processed</td><td>28,093.63</td></tr> </tbody> </table>	Description	tCO <sub>2</sub> e/tProduct	Production	t/yr	CPO	1.35	FFB Processed	129,149.86	PK	1.35	CPO Processed	28,093.63
Description	tCO <sub>2</sub> e/tProduct	Production	t/yr												
CPO	1.35	FFB Processed	129,149.86												
PK	1.35	CPO Processed	28,093.63												

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings																																				
monitored and new developments are designed to minimise GHG emissions.			<table><tr><td>Land Use</td><td>Ha</td></tr><tr><td>OP Planted on Mineral Soil</td><td>18198.59</td></tr><tr><td>OP Planted on Peat Soil</td><td>23.60</td></tr><tr><td>Total oil palm planted area</td><td>18222.19</td></tr><tr><td>Conservation (forested)</td><td>0.00</td></tr><tr><td>Conservation (non-forested)</td><td>627.06</td></tr></table>	Land Use	Ha	OP Planted on Mineral Soil	18198.59	OP Planted on Peat Soil	23.60	Total oil palm planted area	18222.19	Conservation (forested)	0.00	Conservation (non-forested)	627.06																								
			Land Use	Ha																																			
			OP Planted on Mineral Soil	18198.59																																			
			OP Planted on Peat Soil	23.60																																			
			Total oil palm planted area	18222.19																																			
			Conservation (forested)	0.00																																			
			Conservation (non-forested)	627.06																																			
			Milling extraction rate:																																				
			<table><tr><td>OER</td><td>21.75</td></tr><tr><td>KER</td><td>5.14</td></tr></table>	OER	21.75	KER	5.14																																
			OER	21.75																																			
			KER	5.14																																			
			Mill Emission																																				
			<table><tr><td>Emission source</td><td>tCO2e</td><td>tCO2e/tFFB</td></tr><tr><td>POME</td><td>25315.56</td><td>0.20</td></tr><tr><td>Fuel consumption</td><td>4.33</td><td>0.00</td></tr><tr><td>Grid electricity utilisation</td><td>0.00</td><td>0.00</td></tr><tr><td colspan="3">Credits</td></tr><tr><td>Export of excess electricity to housing &amp; grid</td><td>0.00</td><td>-0.01</td></tr><tr><td>Sale of PKS</td><td>0.00</td><td>0.00</td></tr><tr><td>Sale of EFB</td><td>0.00</td><td>0.00</td></tr><tr><td>Total</td><td>25319.89</td><td>0.20</td></tr></table>	Emission source	tCO2e	tCO2e/tFFB	POME	25315.56	0.20	Fuel consumption	4.33	0.00	Grid electricity utilisation	0.00	0.00	Credits			Export of excess electricity to housing & grid	0.00	-0.01	Sale of PKS	0.00	0.00	Sale of EFB	0.00	0.00	Total	25319.89	0.20									
			Emission source	tCO2e	tCO2e/tFFB																																		
			POME	25315.56	0.20																																		
			Fuel consumption	4.33	0.00																																		
			Grid electricity utilisation	0.00	0.00																																		
			Credits																																				
			Export of excess electricity to housing & grid	0.00	-0.01																																		
			Sale of PKS	0.00	0.00																																		
			Sale of EFB	0.00	0.00																																		
			Total	25319.89	0.20																																		
			Plantation / field emission																																				
			<table><tr><td></td><td colspan="3">Own</td></tr><tr><td>Emission sources</td><td>tCO2e</td><td>tCO2e/ha</td><td>tCO2e/FFB</td></tr><tr><td>Land Conversion</td><td>89451.84</td><td>9.01</td><td>0.71</td></tr><tr><td>CO2 Emissions from Fertiliser</td><td>3082.08</td><td>0.31</td><td>0.02</td></tr><tr><td>N2O Emissions from Peat</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td>N2O Emissions from Fertiliser</td><td>1671.56</td><td>0.17</td><td>0.01</td></tr><tr><td>Fuel Consumption</td><td>92.44</td><td>0.01</td><td>0.00</td></tr><tr><td>Peat Oxidation</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td colspan="4">Sinks</td></tr></table>		Own			Emission sources	tCO2e	tCO2e/ha	tCO2e/FFB	Land Conversion	89451.84	9.01	0.71	CO2 Emissions from Fertiliser	3082.08	0.31	0.02	N2O Emissions from Peat	0.00	0.00	0.00	N2O Emissions from Fertiliser	1671.56	0.17	0.01	Fuel Consumption	92.44	0.01	0.00	Peat Oxidation	0.00	0.00	0.00	Sinks			
				Own																																			
Emission sources	tCO2e	tCO2e/ha	tCO2e/FFB																																				
Land Conversion	89451.84	9.01	0.71																																				
CO2 Emissions from Fertiliser	3082.08	0.31	0.02																																				
N2O Emissions from Peat	0.00	0.00	0.00																																				
N2O Emissions from Fertiliser	1671.56	0.17	0.01																																				
Fuel Consumption	92.44	0.01	0.00																																				
Peat Oxidation	0.00	0.00	0.00																																				
Sinks																																							

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings																						
			<table><tr><td>Crop Sequestration</td><td>-75805.40</td><td>-7.64</td><td>-0.60</td></tr><tr><td>Conservation Sequestration</td><td>-3355.03</td><td>-0.34</td><td>-0.03</td></tr><tr><td><b>Total</b></td><td><b>15137.50</b></td><td><b>1.52</b></td><td><b>0.12</b></td></tr></table> <p>Palm Oil Mill Effluent (POME) Treatment</p> <table><tr><td>Diverted to compost</td><td>0%</td></tr><tr><td>Diverted to anaerobic digestion</td><td>100%</td></tr></table> <p>Diverted to Anaerobic Digestion</p> <table><tr><td>Diverted to anaerobic pond</td><td>100%</td></tr><tr><td>Diverted to methane capture (flaring)</td><td>0%</td></tr><tr><td>Diverted to methane capture (electricity generation)</td><td>0%</td></tr></table>	Crop Sequestration	-75805.40	-7.64	-0.60	Conservation Sequestration	-3355.03	-0.34	-0.03	<b>Total</b>	<b>15137.50</b>	<b>1.52</b>	<b>0.12</b>	Diverted to compost	0%	Diverted to anaerobic digestion	100%	Diverted to anaerobic pond	100%	Diverted to methane capture (flaring)	0%	Diverted to methane capture (electricity generation)	0%
Crop Sequestration	-75805.40	-7.64	-0.60																						
Conservation Sequestration	-3355.03	-0.34	-0.03																						
<b>Total</b>	<b>15137.50</b>	<b>1.52</b>	<b>0.12</b>																						
Diverted to compost	0%																								
Diverted to anaerobic digestion	100%																								
Diverted to anaerobic pond	100%																								
Diverted to methane capture (flaring)	0%																								
Diverted to methane capture (electricity generation)	0%																								
	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	YES	Auditor has verified through checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Rajawali CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.																						
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records which covers estates and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly.</p> <p>Rajawali Palm Oil Mill conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS was found to be in functional condition. Data from the stack is connected online to DOE's office. Boiler smoke emission data are within the DOE limit. An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent.</p>																						

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	There was no land preparation of existence or new planting in Rajawali SOU 32 by burning ever since Sime Darby Plantation Bhd. practised zero burning as guided by SDPB ARM. As advocated, the estates practised zero burning. In the replants 2019, 2020 and 2021 visited during the audit in the CU and it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for the Oil Palm cultivation. Signages prohibiting open burning, " <i>Dilarang Membakar</i> " were also viewed.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	The fire prevention and control measures are established in Sime Darby Plantation Bhd group level and operating unit level. For Group level, Zero Burning Policy has been established and monitoring of Hotspot using the PLATINUM platform. The monitoring was established since November 2013. The system monitors any possible occurrence of fire within or nearby the concession areas throughout Sime Darby Plantation Upstream operation globally. At the estates level, there are fire prevention team established. Among the mechanisms to prevent fire are training on firefighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump. 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	During external stakeholder meeting in Sept 2022 that was carried out at Rajawali SOU 32, 77 stakeholders including neighbor was briefed on fire prevention and control measures.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	YES	Verification of land clearance in Rajawali CU by checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to the sampled estates areas, confirmed that there were no new planting or new development of areas at the CU since 15 November 2018. Hence, this Indicator is not applicable.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	SOU Rajawali has reviewed their HCV with new assessment conducted in June 2017. The new HCV assessment titled 'HCV Assessment for Sarawak Zone which included both the planted area and relevant wider landscape-level considerations with villages and forest reserved. Based on the HCV assessment report, there is only HCV 4 declared in SOU Rajawali and the total area of HCV area for SOU Rajawali is 275.40 ha.
	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	

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	YES	
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).	YES	<p>The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations of Rajawali CU. There is only common bird sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an HCV Management/Action Plan made available in Samudera Estate, for Rajawali Estate the HCV Management Plan was updated in Dec 2022, Semarak Estate in Mar 2022 and Nov 2022 at Bayu Estate. The visited estates had maintained their HCV4 which are the Stream, Slope, River Reserve (Sg Singrok), Water Catchment Area, Mill Water Catchment (Rajawali Estate), River Reserve (Sg Perihias), Water Catchment Area, Isolated remnant forest, Slope, Stream (Samudera Estate), Water Catchment Area, Stream, Slope, Stream (Semarak Estate) Stream, River Reserve (Sg Similajau), Slope at Bayu Estate respectively.</p> <p>The HCV Management/Action Plan – for All Estates were reviewed and verified on the ground by the Audit team. It was evidenced that the Plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified) at each Estate. The Plan which contains monitoring requirements are updated every year. Consultation with stakeholders about HCV was implemented during SOU 32 external stakeholder meeting.</p> <p>4. Rehabilitation Buffer zones by planting a beneficial plant</p> <p>5. Meeting with Government bodies/authorities Department on forest trees planting and forest rehabilitation within the HCV areas.</p>
	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	YES	Not applicable as no local community was identified in HCV areas

## RSPO P&C PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	management of these conservation areas.		
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	YES	Although there was no RTE species found in the CU, Rajawali SOU still conduct programme to regularly educate the workforce about the status of RTE species in Malaysia. HCV and RTE species training were last held and Sime Darby units also established their own disciplinary measures if any of their staff or workers was 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 Wildlife Department immediately for the latter's further action.
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	YES	Rajawali CU conducted an on-going monitoring of their HCV4 areas as evidenced by the records in the 'Monitoring of HCV & Conservation Area' files at all the Estates. No RTE species were found within the estates area. Noted the CU had continued to implement planned actions such as awareness to the staffs and public on enhancing biodiversity, posting of relevant information in the Sime Darby webpage and erection of signage at strategically locations.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	YES	Not applicable since no new land clearing without prior HCV assessment since November 2005 and or without prior HCV-HCSA assessment since 15 November 2018 where the Remediation and Compensation Procedure (RaCP) applies.

## RSPO P&C PUBLIC SUMMARY

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

Clause	Indicators	Comply Yes/No	Findings
<p>5.5.2 Time-bound plan</p> <p>A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.</p>	<p>(a)</p> <p>As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.</p>		<p>Sime Darby Plantation (SDP) membership is before 2018 and time bound plan maximum up to 30th June 2023. As at January 2022, no deviation of TBP and approval by RSPO Secretariat are not required. SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Currently, only Indonesia operation yet to be certified.</p> <p><b><u>Indonesia Operations – as of January 2022</u></b></p> <p><b>PT Bahari Gembira Ria</b> Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate &amp; Report for PT BGR - <a href="https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P90000010ioYJEAZ">https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&amp;file=00P90000010ioYJEAZ</a></p> <p><b>PT Sandika Natapalma</b> Only Karya Palma Estate yet to be certified - Pending confirmation from Badan Pertanahan National (BPN) on Hak Guna Usaha (HGU) Document.</p> <p><b>PT Budidaya Agro Lestari</b> Only Beturus (PT BAL) Estate yet to be certified – HGU obtained as per May 2018. However never been released by BPN.</p> <p><b>PT Guthrie Pecconina</b> Sg Jernih Estate and KKPA was separated in 2022 and recorded separately. 890.98 Ha – still under Land legalisation process and process Kadastral.</p> <p><b>PT Sime Indo Agro</b> Only East Estate/Sei Mawang Estate yet to be certified – Land legalisation process for East Estate for 5,815.64 ha is still in process.</p> <p><b>PT Bina Sains Cemerlang</b> Sungai Pinang Estate &amp; Bukit Pinang Estate yet to be certified – Land legalisation process for 308.35 ha is still in process.</p>

## RSPO P&C PUBLIC SUMMARY

			<p><b><u>Liberia Operations – as of January 2020</u></b>  As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI).  <a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations">http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</a></p> <p><b><u>New Britain Palm Oil (NBPOL) Operations – as of March 2021</u></b>  <b>Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.</b>  Last Certified on 27 March 2020. There is total area for NPP: 710.30 ha which is currently excluded from the certification scope until the NPP is approved.</p>
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	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);	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	The details of the Time Bound Plan described as per attachment 6. SDP



## RSPO P&C PUBLIC SUMMARY

		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.		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 1 <sup>st</sup> January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;		Verification through <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , GOOGLE maps data, estates maps and through HCV assessment report, and planting profile evidenced that there was no new planting and no new development of area observed. Support also with internal and external audit (ISPO certified) there was no replacement of primary forest or HCV areas in the uncertified management unit. Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;		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;		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;		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.

## RSPO P&C PUBLIC SUMMARY

	(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,		<p>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 were 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&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.</p> <p>Respective sites-maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company.</p>
		with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		
		<ul style="list-style-type: none"> <li>A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement;</li> </ul>		
		<ul style="list-style-type: none"> <li>Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.</li> </ul>		
		<ul style="list-style-type: none"> <li>Desktop study e.g. web check on relevant complaints</li> </ul>		
		<ul style="list-style-type: none"> <li>If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.</li> </ul>		
	(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		

## RSPO P&C PUBLIC SUMMARY

		cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.		
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.		
<p>5.6.6</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>		No additional indicators		<p>As it has been mentioned in 4.4.1 of this checklists, the Land Title for All Estate has been verified, for all estates. The Land Title was under the name of Sime Darby Plantation Bhd. Each estate had legal use of the land through Lands and Surveys Department following the payment of premium and Land fee. Based on this, it has been confirmed that there was no such case concerning the rights of local communities or indigenous people in the SOU 32 Rajawali.</p>

## RSPO P&C PUBLIC SUMMARY

### 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
3.7.1 MAR 01 2022	Major	<p>Requirement: 3.7.1 A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&amp;C, in a form they understand, and which includes assessments of training.</p> <p>Finding: Training related to the contractor management which is accessible to the contractor was not fully in place, in a form they understand, and which includes assessments of training.</p> <p>Objective evidence: Based on interview and documentation review, some matters related to the aspects of RSPO P&amp;C was not understood by the contractor (Syuhadah Enterprise) i.e on the payment on the rest day to the new contractor workers.</p>	<p>The root cause: The training Plan was available; however the management did not include contractors resulted in lack of understanding of aspects of RSPO P&amp;C among contractors. Management of SOU Rajawali accept the mistakes regarding this issue.</p> <p>Correction: Management will conduct another refresher training on relevant to RSPO P&amp;C to the contractor (Syuhadah Enterprise) and their person in charge.</p> <p>Corrective action:</p> <ol style="list-style-type: none"> <li>1. Assess and evaluate all contractors and person in charge after the completion of each training conducted on relevant RSPO P&amp;C matters.</li> <li>2. Include contractors in the Training Plan for every year.</li> <li>3. Training Plan for Contractors Clinic Training FY2022 and FY2023.</li> </ol>	<p>Auditor has verified the pictorial evidence of Training &amp; the evaluation record for training involving contractors, which has been conducted on 15/10/2022 and auditor also verify the evidence of Training Plan established for contractors for year 2022 and 2023.</p> <p>Status : Closed</p>
3.7.3 MZK 01 2022	Minor	<p>Requirement: 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.</p> <p>Finding: No appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS).</p>	<p>The root cause: Personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) at all estates was not identified. It was assumed that the training was for Mill personnel only. The SOU Rajawali admitted that they didn't include the Weighbridge operators from every Estate for SCCS training.</p>	<p>Corrective action plan accepted.</p> <p>Status: Open The effectiveness of the corrective action plan will be verified during next audit</p>

## RSPO P&C PUBLIC SUMMARY

		<p>Objective evidence:</p> <p>There are no records of training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) at all estates. Sighted Training has been conducted at Rajawali POM on 18/8/2022, However no attendance record for Weighbridge clerk (personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS)) from the estate, which led to inconsistencies of stamping RSPO Certificate No. at WB Tickets from Diversion RSPO certified estate such as Sahu, Damai etc.</p>	<p>Correction:</p> <p>To stamp MSPO Certificate No. at WB Tickets (Damai Estate) and immediately conduct SCCS training to Weighbridge clerk from the estates.</p> <p>Corrective action:</p> <p>To include Weighbridge clerk from the estate in future SCCS training and included in the training Plan for the future.</p>	
--	--	--	---	--

## RSPO P&C PUBLIC SUMMARY

### ATTACHMENT 5

#### STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor
3.4.3 RZ 01 2021	Major	<p>Finding: The Social Assessment Action Plans FY2021 for all operating units within SOU 32 were not reviewed and updated regularly in a participatory way.</p> <p>Objective evidence: The Social Assessment Action Plans FY2021 (SAAP 21) for SOU 32 were not reviewed and updated regularly, causing the following social issues faced by the workers not taken into account. In particular, at Rajawali Palm Oil Mill (SAAP 21 updated on 26 Nov 2021), the following issues were not participatory assessed:</p> <ul style="list-style-type: none"> <li>a) Workers had to incur their own costs in replacing light bulbs in the houses.</li> <li>b) Workers had to rent a van @RM30 per person to go to Bintulu town to withdraw their monthly salaries. The grocery shop which facilitates cash withdrawal sometimes run out of cash. Workers also allege preferential treatment by the shop in favour or selected workers.</li> </ul> <p>The change in working hours where the 1<sup>st</sup> shift ends at 5.00PM has deprived them of time for recreational activities.</p>	<p>Each operating unit carries out its reviews of its Social Assessment Action Plans annually. The latest reviews were carried out as follows:</p> <ul style="list-style-type: none"> <li>c) Bayu Estate in August 2022</li> <li>d) Samudera Estate in February 2022</li> <li>e) Semarak Estate on 27 March 2022</li> <li>f) Rajawali Estate on 14 July 2022</li> </ul> <p>The reviews considered issues raised by its internal and external stakeholders. All the issues rectify previously, i.e</p> <p>a) <i>Workers had to incur their own costs in replacing light bulbs in the houses.</i></p> <p>b) <i>Workers had to rent a van @RM30 per person to go to Bintulu town to withdraw their monthly salaries. The grocery shop which facilitates cash withdrawal sometimes run out of cash. Workers also allege preferential treatment by the shop in favour or selected workers.</i></p> <p>c) <i>The change in working hours where the 1st shift ends at 5.00PM has deprived them of time for recreational activities.</i></p> <p>has been inserted into the Social Assessment Action Plan, therefore, previous NCR RZ 01 2021 was satisfactorily closed.</p> <p>Status: Closed</p>
3.7.2 RZ 02 2021	Minor	<p>Finding: Records of training aspects of the RSPO P&amp;C, i.e. policy on prohibiting retaliation against Human Rights Defenders are maintained, however, the implementation was not effectively communicated by individual basis.</p> <p>Objective evidence: Training which covers applicable aspects of the RSPO P&amp;C, i.e. policy on prohibiting retaliation against Human Rights Defenders, has not been effectively communicated to all levels of the workforce. There is negligible to minimum understanding of the Policy on prohibiting retaliation against Human Rights Defenders in audit interviews of various levels of workforce.</p>	<p>Sighted also: Training which covers applicable aspects of the RSPO P&amp;C, i.e. policy on prohibiting retaliation against Human Rights Defenders, has been effectively communicated to all levels of the workforce Bayu Estate (on 27 Jan 2022), Semarak Estate (on 16 July 2022), and Rajawali Estate (on 26 Feb 2022). Based on audit interviews of various levels of workforce in all estates in Rajawali CU was acceptable. Therefore, previous Minor NCR RZ 02 2021 was satisfactorily closed.</p> <p>Status: Closed</p>

## RSPO P&C PUBLIC SUMMARY

3.3.2 MN 01 2021	Minor	<p>Finding: The mechanism to check consistent implementation of procedure Personal Protective Equipment (PPE) UM/HSE/OCF/03 2021 was not in place.</p> <p>Objective evidence: During the site visit at all estates, sighted all workers was wears appropriate PPE, however, site inspection at Nursery of Bayu Estate, it was found out that 5 out of 7 Nursery Workers were not wearing straw hats as procedure.</p>	<p>During the audit, random interviews with the estate workers revealed that they understood the requirements stated in the SOPs. For example, it was observed that harvesting standards and pesticides usage had been properly understood by the estate harvesters and sprayers respectively.</p> <p>During site inspection at Nursery of Bayu Estate, it was found out that all the Nursery Workers were wearing straw hats as per procedure and consistent in the implementation of procedure. Personal Protective Equipment (PPE) UM/HSE/OCF/03 2021. <i>As a result, previous Major NCR MN 01 2021 (under indicator 3.3.2) was satisfactory closed.</i></p> <p>Status: Closed</p>
2.1.2 DA 01 2021	Minor	<p>Finding: The documented system for ensuring legal compliance was not in place.</p> <ol style="list-style-type: none"> <li>1) Refer to Occupational Safety and Health (Noise Exposure) Regulations 2019 Section 4 (1). This regulation gazette on 01/03/2019 and come into operation on 01/06/2019.</li> <li>2) Sarawak Labour Ordinance (Chap 76) section 109 payment of wages.</li> </ol> <p>Objective evidence:</p> <ol style="list-style-type: none"> <li>1) The Noise Risk Assessment yet to be carried out for all estates until the audit process. The estates management only managed to get the quotation from Global Green OSH Services Sdn. Bhd. dated 27/10/2021.</li> <li>2) At Bayu Estates – Based on verification of pay slips October 21, September 21, August 21 and interview with contractor workers (KSG Enterprise) was informed they received the salary later than 7 days after the expiration of the wage period.</li> </ol>	<p>Noise Risk Assessment Draft Report SOU Rajawali (1 Mill 4 Estate) were available and full report yet to be issued by the consultant. The assessment was conducted on 15-18/06/2022 by Global Green Osh Services Sdn. Bhd. and the assessor are Mr. Pau Choon Hock (NRA Registration no.: #HQ/15/PEB/00/145). This assessment was carried out to identified and explain the finding of noise risk assessment at estate operation. From this assessment 5 work unit i.e., tractor driver, water pump operator, power barrow operator, mechanical buffalo operator and foremen have been risk assessed. Baseline audiometric testing shall be conducted mechanical buffalo operator only as per the recommendations. However, baseline audiometric testing yet to be conducted due to full report was not ready and completed by consultant.</p> <p>Sighted at Bayu Estate Contractor Workers (KSG Enterprise) interviewed confirmed that they Are paid before 7 of every month since last assessment. Thus, Past NCR DA 01 2021 was successfully closed</p> <p>Status: Closed</p>

# RSPO P&C PUBLIC SUMMARY

## ATTACHMENT 6 – Timebound Plan [Received 20/05/2022]

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

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



**RSPO P&C PUBLIC SUMMARY**

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

## RSPO P&C PUBLIC SUMMARY

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

# RSPO P&C PUBLIC SUMMARY

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

# RSPO P&C PUBLIC SUMMARY

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

## RSPO P&C PUBLIC SUMMARY

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

## RSPO P&C PUBLIC SUMMARY

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

No	Management Unit (SOU Name)	Mill and Supply Base	Time Bound Plan	Latest Internal / External Audit Date	Location	Status	Certified Date	Remarks (for uncertified unit)
1	PT Lahan Tani Sakti	Alur Dumai Mill	-		Rokan Hilir District – Riau	Certified	16-Jan-12	
		Alur Dumai Estate	-			Certified		
2	PT Sajang Heulang	Mustika Mill	-		Tanah Bumbu District – South Kalimantan	Certified	3-Jul-13	
		Mustika Estate	-			Certified	3-Jul-13	
		Pantai Bonati Estate	-			Certified	6-Jul-11	
3	PT Ladangrumpun Suburabadi	Angsana Mill	-		Tanah Bumbu District – South Kalimantan	Certified	6-Jul-11	
		Angsana Estate	-			Certified		
		Gunung Sari Estate	-			Certified		
4	PT Langgeng Muaramakmur	Bebunga Mill	-		Kotabaru District – South Kalimantan	Certified	16-Mar-12	
		Bebunga Estate	-			Certified		
		Sungai Cengal Estate	-			Certified		
		Bakau Estate	-			Certified		
5	PT Kridatama Lancar	Sukamandang Mill	-		Seruyan and East Kotawaringin District – Central Kalimantan	Certified	5-Jul-11	
		Sukamandang Estate	-			Certified		
		Sapiri Estate	-			Certified		
		Barasdanum Estate	-			Certified		
		Kuala Kuayan Estate	-			Certified		
6	PT Bahari Gembira Ria	Ladang Panjang Mill	-		Muaro Jambi District - Jambi	Certified	9-Jul-12	Only Division 3 is certified (1,202 Ha). Total Areas of Divison 1 and 2 (1,796.19 ha) HGU still in process.
		Ladang Panjang Estate	-			Certified	9-Jul-12	
7	PT Tunggal Mitra Plantations	Manggala Mill	-		Rokan Hilir District – Riau	Certified	25-Nov-10	
		Manggala 1 Estate	-			Certified		
		Manggala 2 Estate	-			Certified		
		Manggala 3 Estate	-			Certified		

**RSPO P&C PUBLIC SUMMARY**

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

## RSPO P&C PUBLIC SUMMARY

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



# RSPO P&C PUBLIC SUMMARY

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

## RSPO P&C PUBLIC SUMMARY

23	PT Mitral Austral Sejahtera	MAS Mill	NA	NA	Sanggau District – West Kalimantan	NA	NA	The properties were sold and currently SDP have no control in the management. A letter to RSPO Secretariat has been sent on 27 June 2019 on the confirmation of disposal of PT MAS and reported to Bursa Malaysia accordingly.
		MAS 1 Estate	NA	NA		NA		
		MAS 2 Estate	NA	NA		NA		
		MAS 4 Estate	NA	NA		NA		
		Plasma MAS Estate	NA	NA		NA		

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

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

# RSPO P&C PUBLIC SUMMARY

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

**RSPO P&C PUBLIC SUMMARY**

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

# RSPO P&C PUBLIC SUMMARY

No	Management Unit (SOU Name)	Supply Base	Time Bound Plan	Location	Status	Certified Date
7		Karaisu Estate				
		Moroa Estate				
		Bilomi Estate				
		Loata Estate				
		Haella Estate				
		Garu Estate				
		Daliavu Estate				
		Sapuri Estate				
		Malilimi Estate				
		Rigula Estate				
		Nomundo Estate				
		Navarai / Karato ME /KDC EU Estate				
		Volupai / Lotomgam / Natupi / Goruru Estate				
		Lolokoru Estate				
		Ove Estate				
		Tamare Estate				
		Smallholders LSS Mosa (1822)				
		Smallholders VOP East (1817)				
		Smallholders VOP Central (1964)				
		Smallholders VOP West (1279)				
		Smallholders LSS Kapiura (551)				
		Smallholders VOP Kapiura (850)				
		Smallholders Kaulong/Akami/Pushiki/Repamira/Sakapei (20)				
	Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Erap Mill	Sep-20	Markham Farms	Certified	Certified on 27 March 2020. There is total area for NPP: 710.30 ha which is currently excluded from the certification scope until the NPP is approved.
		Munum Estate	Sep-20		Certified	
		Maralumi Estate	Sep-20		Certified	
		Erap Estate	Sep-20		Certified	

## RSPO P&C PUBLIC SUMMARY

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

No	Management Unit (SOU Name)	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
1	Sime Darby Plantation (Liberia) Grand Cape Mount	Grand Cape Mount Mill	Not Applicable - Property disposed	Grand Cape Mount County	Not yet Certified	NA	As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI). <a href="http://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations">http://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations</a>
		Bomi Estate					
		Lofa Estate					
		Matambo Estate					
		Grand Cape Mount Estate					