



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

File Ref. : ES10170011

RSPO PUBLIC SUMMARY REPORT

CLIENT : SIME DARBY PLANTATION BERHAD – SOU 6 TENNAMARAM

PARENT COMPANY : SIME DARBY PLANTATION BERHAD

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

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

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
SOU 6 Tennamaram	Tennamaram POM	3°23' 44.30" N	101°25' 03.41" E	45600 Bestari Jaya, Selangor
	Tennamaram Estate	3°24' 11.35" N	101°23' 59.24" E	45600 Bestari Jaya, Selangor
	Sungai Buloh Estate	3°18' 32.27" N	101°19' 07.23" E	45700 Bukit Rotan, Selangor
	Bukit Talang Estate	3°24' 09.15" N	101°18' 35.72" E	45000 Kuala Selangor

MAP : See Attachment 1

AUDIT DATE : 17– 21 OCTOBER 2022

DURATION : 22 auditor days

TYPE OF AUDIT : ☒ Annual Surveillance Audit No. 01

☐ Recertification Audit

STANDARD : MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

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

VALIDITY OF RSPO CERTIFICATE : 21-01-2022 – 20-01-2027

The following attachments form part of this report:

Non-conformity Report(s) ☒

List of additional site(s) ☐

Report by Audit Team Leader

Name : ROZAIMEE BIN AB RAHMAN

Signature :

Date : 25/01/2023

Acknowledgement by Client's Representative

Name : *Sime Darby Plantation Berhad
Sungai Buloh Estate*

Signature :
AZMI BIN ISMAIL
Senior Manager

Date :

SUMMARY OF AUDITS

Recertification audit						
On-site audit date	:	27 Sep – 1 Oct 2021 (15 a.d)	No. of auditor days	:	21 Auditor Days	
Remote audit date	:	19 – 20 Jan 2021 (6.0 a.d)				
Audit team	:	Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar bin Kamaruzaman, Rozaimée bin Ab Rahman, Rohazimi Mat Nawi (TA-remote)				
No. of major NCR	:	2	Indicator: 3.8.6 (SC), 3.4.3		Closing date :	29/12/2021
No. of minor NCR	:	Nil	Indicator : N/A			
Indicate the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers	
		√		√	√	
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders	
		Indigenous people	Contractor	Others (Please specify)		
			√			
Supply base sampled	:	Tennamaram Estate, Bukit Talang Estate, Sungai Buloh Estate				
Justification of audit planning	:	The total allocation of auditor days were: 21.0 auditor days Mill = 5 mandays (4 day-safety, environment, GHG, Social + 1 day-supply chain) Tennamaram Estate = 5 mandays (safety, environment, GAP, Social, HCV) Bukit Talang Estate = 5 mandays (safety, environment, GAP, Social, HCV) Sungei Buloh Estate = 6 mandays (larger area than the rest of estates in the SOU)				
Name of peer reviewer	:	Prof. Emeritus Dr Jalani Sukaimi				
Report approved by	:	Kamini Sooriamoorthy		Approval date : 21/01/2022		

Annual Surveillance Audit 1					
On-site audit date	:	17– 21 OCTOBER 2022	No. of auditor days :	22 DAY (combined RSPO & MSPO)	
Audit team	:	Rozaimée bin Ab Rahman, Selvasingam T.Kandiah, Dzulfikar Azmi, Mohd Zulfakar bin Kamaruzaman, Rohazimi Mat Nawi			
No. of major NCR	:	3	Indicator:4.2.1, 3.6.2, 3.8.11	Closing date: 18/01/2022	
No. of minor NCR	:	2	Indicator :3.7.2, 7.3.2		
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	:	Tennamaram Estate, Bukit Talang Estate, Sungai Buloh Estate, Tennamaram POM			
Changes since the last audit	:	No changes			
Justification of audit planning	:	The total allocation of auditor days were: 22.0 auditor days Mill = 5 mandays (4 day-safety, environment, GHG, Social + 1 day-supply chain) Tennamaram Estate = 5 mandays (safety, environment, GAP, Social, HCV) Bukit Talang Estate = 5 mandays (safety, environment, GAP, Social, HCV) Sungei Buloh Estate = 6 mandays (larger area than the rest of estates in the SOU)			
Name of peer reviewer	:	NA			
Report approved by	:	Kamini Sooriamoorthy		Approval date : 25/01/2023	

SUMMARY OF INFORMATION

TABLE 1

	RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period / Reporting Period	**Oct 2021 – Sept 2022	Oct 2022 – Sept 2023			
Certified FFB Processed (MT)	202,046.56	186,569.65			
Production of Certified CPO (MT)	40,409.32	38,668.95			
Production of Certified PK (MT)	10,102.33	9,524.37			
Certified Areas (Ha)	10,706.26	10,706.26			
Planted Areas (Ha)	10,083.85	*10,017.01			
Production Areas (Ha)	7,951.24	8,391.25			
HCV Areas / Conservation Areas (Ha)	2.81	2.81			
REMARKS	*Planted Ha reduced by 66.84 ha :				
	Estate		Hectarage reduction (Ha)	Remarks	
	Tennamaram		45.03	Solar Project	
	Sungai Buloh Estate		18.21	Solar Project	
	Bukit Talang Estate		3.60	Property sold to 3 rd party for solar project	
			66.84		
	**The actual period cover in this report is between Oct 2021 – Sept 2022				

TABLE 2

	PO	PK
Last years certified volume (MT)	40,409.32	10,102.33
Last years actual certified sold (MT)	34,775.68	7,529.70
Last years actual sold under other schemes (MT) - ISCC	53.19	0.00
Last years sold conventional (MT)	2,872.09	1,934.60
Last year actual sold CSPO credits (where applicable)	0.00	0.00
New year certified volume (MT)	38,668.95	9,524.37

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1.0 AUDIT PROCESS

1.1 Certification Body

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

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Rozaimée Ab. Rahman	Lead Auditor Health & Safety, Environment, SCCS	Holds a B. Sc. of Agriculture from UPM. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO.
Mohd Zulfakar Kamaruzaman	Auditor HCV, Social (External)	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor.
Dzulfiqar Azmi	Auditor social internal	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He has experience in auditing since 2018. He is trained as an RSPO Lead Auditor.
Rohazimi Mat Nawi	Auditor safety / environment/ metric template	Hold B. Sc (Hons) Chemical_Gas Engineering from Universiti Teknologi Malaysia. He has been in the Plantations Industry with various company having served in Palm Oil Mill. He was qualified in the auditing line with experienced in Sustainability, QMS, EMS, OHSMS and Supply Chain audit.
Selvasingam T Kandiah	Auditor Safety, GAP, TBP	Holds a B. Sc. (Hons) in Agriculture. He had worked as a planter with Kumpulan Guthrie Berhad before retiring including in Liberia. He has more than 29 years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C & MSPO.

1.3 Audit methodology

The audit covered the Tennamaram palm oil mill and three of its supply base, 100% sampling. The sampling was conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The 3 supply base covered during the audit are Tennamaram Estate, Sungai Buloh Estate and Bukit Talang Estate. The audit included an on-site audit to the estates, mill and local communities 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 (local / foreign / Orang Asli workers / male & female)	<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"> ▪ All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in English/Bahasa as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer. ▪ They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime. ▪ They have been getting salaries above RM1,500 since May 2022. Salaries were paid before the 7th of every month. ▪ No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment. ▪ No discrimination between migrant workers and local workers, between male and female workers. ▪ Comfortable housing with water and electricity provided by government (Subsidise Electricity). ▪ OPP System implemented as mechanism to repair house defect. ▪ Have access to affordable food from the canteen/sundry shops within the estate/mill premises. ▪ Entitled to free medical facilities at the estate clinic. ▪ Have representatives who attend regular meetings (Social Dialog & NUPW) with the management where they can put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects. ▪ They knew the types of work offered at Tennamaram CU (mill & estates) when they were in their countries of origin. ▪ All migrant workers keep their own passports. ▪ Shuttle services FOC once a month for workers go to nearest town. ▪ Monthly recognition for workers i.e. highest harvesting productivity and housing cleanness ▪ Alternate Sunday/Rest Work ▪ Complaint channel via various platform i.e. Suara Kami (Platform by Nestle), Impactt (Ulula), WMU Careline (From Region), Whistleblowing (HQ). ▪ Freedom Decision Movement by worker for medical access and leaving of workplace during rest or public holiday via implemented the Guideline Medical Access Procedure & Guideline of Leaving of Workplace.
2) Settlers	NA
3) Villagers / Local communities (including women representatives, displaced communities)	Interviewed local communities from villager representatives confirmed no land dispute.
4) Suppliers	Interviewed with the hardware supplier. Fair dealings with the SOU, Payments are made within 1 months of invoice.
5) Contract workers (local / foreign / Orang Asli	Interview session with contractor workers found that

workers / male & female)	there were grievances from 2 FFB Driver related to contractor management on documentation of pay and condition, employment contracts and related documents (i.e detailing payment, payroll documents, providing accurate information on compensation for all work performed). In addition, the others grievance system such as Suara Kami/whistleblowing was not fully understood by sampled contractor workers. This issue has been highlighted as non-conformity under indicator 4.2.1 in the report.
6) Local & national NGOs	NA
7) Government agencies / Statutory bodies	No land claims/disputes and no social issues. Harmonious co-existence.
8) Independent growers / Smallholders	There was no third-party FFBs sent to the mill. No contract involved with smallholder.
9) Indigenous people	No indigenous people living nearby to the SOU.
10) Contractor	It was found that the FFB Contractor is lack of awareness on Employment Act 1955 such as not implementing collective agreements, discrepancies of data in documentation of pay and condition, payment received not as per employment contracts and payslip is given to the workers upon request. As a result, this issue has been highlighted as non-conformity under indicator 3.7.2 in the report.
11) Previous land owner (if any)	Interviewed local communities from villager representatives confirmed no land dispute.
12) Others (please specify)	NA

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 Tennamaram certification unit (CU) is one of the Sime Darby Plantation Berhad (SDPB) Strategic Operating Unit (SOU). The CU is also known as SOU 6 and was certified to the RSPO P&C by SIRIM QAS International Sdn Bhd in 2015. In 2016, the CU was certified with one mill and 4 estates. This has been revised in 2017, where the number of units of supply base of SOU 6 had been reduced to 3, i.e. Tennamaram Estate, Bukit Talang Estate and Sungai Buloh Estate. Previously Elmina Estate had been merged into Tennamaram Estate, but during recertification audit 2020 in Sept 2021, Elmina Estate was completely handed over to SD Property.

The palm oil mill maintained its capacity of 60 mt FFB / hour. All the estates within the CU have been fully developed before the year of 2005. The SOU did not have other management system certification beside of RSPO P&C and SC and ISCC.

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

The FFB sourced from company owned estates that are certified. Details of the FFB contribution from each source to the Tennamaram Palm Oil Mill are shown in the following tables.

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

Estates	FFB Production	
	Tonnes	Percentage (%)
Tennamaram Estate	36,768.41	18.60
Sungai Buloh Estate	71,534.87	36.20
Bukit Talang estate	55,817.42	28.25
Bukit Cheraka Estate	22,888.11	11.58
Bukit Kerayong Estate	10,614.31	5.37
Total	197,623.12	100

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

CU own estates	FFB Contribution	
	Tonnes	Percentage (%)
Tennamaram Estate	39,048.26	100%
Sungai Buloh Estate	88,057.45	100%
Bukit Talang Estate	59,463.94	100%
Total	186,569.65	100%

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

<u>Identity Preserved</u>	Total (MT)
FFB Received	197,623.12
FFB Processed	197,623.12
CPO Production	37,700.96
PK Production	9,464.30
CPO delivered as IP	34,775.68
CPO delivered as non-RSPO certified (conventional + ISCC)	2,925.28
PK delivered as IP	7,529.70
PK delivered as non-RSPO certified	1,934.60
Product sold under Book & Claim	0

**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	186,569.65
FFB Processed	186,569.65
CPO Production	38,668.95
PK Production	9,524.37

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Tennamaram	1,769.77	1,981.60
Sungai Buloh Estate	4,803.15	5,152.22
Bukit Talang Estate	3,444.09	3,572.44
Total	10,017.01	10,706.26

Table 6: Planting profile for Tennamaram Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1993	3rd	Mature	10.24	0.58
1997	3rd	Mature	53.41	3.02
1999	3rd	Mature	107.41	6.07
2002	2nd	Mature	35.91	2.03
2003	2nd	Mature	69.46	3.92
2004	2nd	Mature	53.58	3.03
2006	2nd	Mature	135.94	7.68
2007	2nd	Mature	67.34	3.80
2008	2nd	Mature	88.37	4.99
2009	2nd	Mature	54.22	3.06
2010	2nd	Mature	220.34	12.45
2011	2nd	Mature	25.99	1.47
2013	2nd	Mature	35.55	2.01
2014	2nd	Mature	63.58	3.59
2015	2nd	Mature	107.82	6.09
2017	2nd	Mature	94.97	5.37
2018	4th	Mature	157.95	8.92
2019	4th	Mature	112.15	6.34
2019	4th	Mature	66.79	3.92
2019	4th	Immature	2.94	0.17
2019	4th	Immature	55.54	3.14
2021	4th	Immature	67.93	3.84
2022	4th	Immature	82.34	4.65
Total			1,769.77	100%

Table 7: Planting profile for Sungai Buloh Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1995	2 nd planting cycle	Mature	154.20	3.21
1996	2 nd planting cycle	Mature	49.90	1.04
1997	2 nd planting cycle	Mature	120.3	2.50
1998	2 nd planting cycle	Mature	308.69	6.42
2000	2 nd planting cycle	Mature	68.5	1.43
2001	2 nd planting cycle	Mature	128.32	2.67
2002	2 nd planting cycle	Mature	247.26	5.15
2003	2 nd planting cycle	Mature	84.70	1.76
2004	2 nd planting cycle	Mature	74.90	1.56
2006	2 nd planting cycle	Mature	127.90	2.66
2007	2 nd planting cycle	Mature	173.30	3.60
2008	2 nd planting cycle	Mature	182.38	3.79
2009	2 nd planting cycle	Mature	153.91	3.20
2010	2 nd planting cycle	Mature	330.4	6.88
2011	2 nd planting cycle	Mature	77.5	1.61
2013	2 nd planting cycle	Mature	411.90	8.57
2014	2 nd planting cycle	Mature	217.9	4.53
2015	2 nd planting cycle	Mature	296.27	6.17
2016	2 nd planting cycle	Mature	171.11	3.56
2017	2 nd planting cycle	Mature	205.83	4.28
2018	2 nd planting cycle	Mature	337.31	7.02
2019	3 rd planting cycle	Immature	208.48	4.34
2020	3 rd planting cycle	Immature	228.50	4.75
2021	3 rd planting cycle	Immature	214.70	4.46
2022	3 rd planting cycle	Immature	228.99	4.76
Total			4,803.15	100

Table 8: Planting profile for Bukit Talang Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1998	3 rd	Mature	149.13	4.33
1999	3 rd	Mature	129.38	3.76
2000	3 rd	Mature	122.25	3.55
2001	3 rd	Mature	320.34	9.30
2002	3 rd	Mature	200.87	5.83
2003	3 rd	Mature	278.53	8.09
2004	3 rd	Mature	47.18	1.37
2007	3 rd	Mature	91.97	2.67
2008	3 rd	Mature	45.71	1.33
2009	3 rd	Mature	41.95	1.22
2011	3 rd	Mature	47.02	1.37
2012	3 rd	Mature	296.30	8.60
2013	3 rd	Mature	51.51	1.50
2014	3 rd	Mature	46.64	1.35
2016	3 rd	Mature	332.76	9.66
2017	3 rd	Mature	204.31	5.93
2018	3 rd	Mature	183.56	5.33
2019	3 rd	Mature	215.88	6.27
2020	4 th	Mature	102.46	2.97
2021	4 th	Immature	267.01	7.75
2022	4 th	Immature	269.33	7.82
Total			3,444.09	100.00

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Mahadzir bin Md Kassim
Position	:	Senior Manager (SOU Chairman)
Address	:	Bukit Talang Estate, Jalan Raja Musa, 45600 Bestari Jaya, Selangor
Phone no.	:	03 3289 1180
Fax no.	:	03 3289 5370
Email	:	mahadzir.kassim@simedarbyplantation.com

3.0 AUDIT FINDINGS

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

There was no change to the certified products since last assessment.

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 :

As in the TBP

- 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?

No changes-latest communication with RSPO secretariate made on 26 January 2022

- 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 *	<input checked="" type="checkbox"/> Closed	<input type="checkbox"/> Not closed*
	* If not closed, minor non conformity will be upgraded to major non conformity		
3.5.	Complaint received from stakeholder (if any)		
	Na		
4.0	DETAILS OF NON-CONFORMITY REPORT		
4.1	For P&C (Details checklist refer to Attachment 3) :		
	Total no. of minor NCR(s) (details refer to Attachment 3)	List : 2 –	7.3.2 (RMN 01 2022) & 3.7.2 (DA 01 2022)
	Total no. of major NCR(s) (details refer to Attachment 3)	List :3 -	4.2.1 (DA 02 2022), 3.6.2 (RAR 01 2022), & 3.8.11 (RAR 02 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 :	
5.0	AUDIT CONCLUSION		
	The audit team concludes that the organization has / has not * established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.		

6.0 RECOMMENDATION

☐

No NCR recorded. Recommended to continue certification.

☒

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

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

☒

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

☒

Recommended to continue certification.

☐

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

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

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 : ROZAIMEE BIN AB RAHMAN

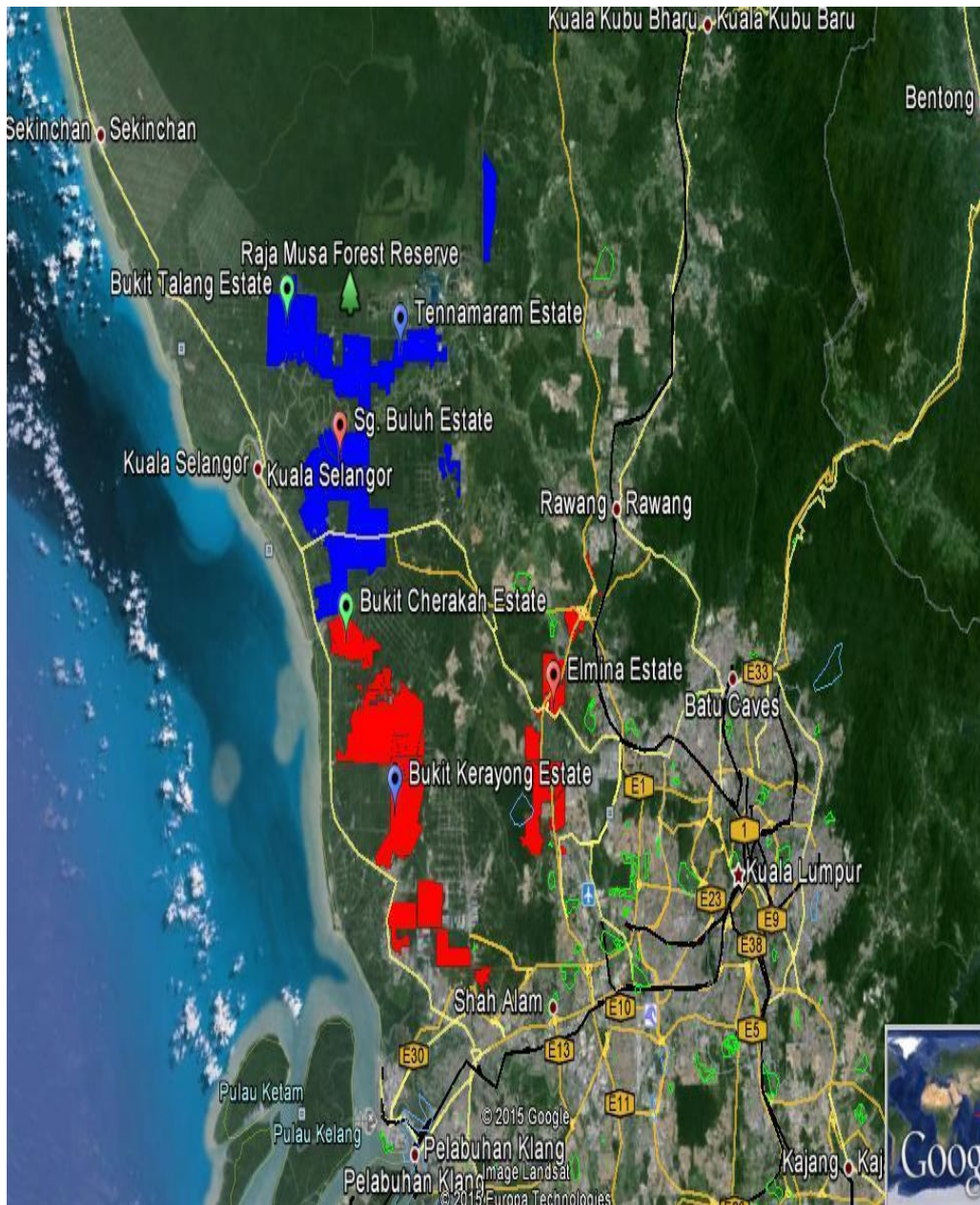


18/01/2022

(Name)

(Signature)

(Date)



SURVEILLANCE 1 AUDIT PLAN

1. Objectives

The objectives of the audit are as follows:

- (i) To determine Certification Unit conformance against RSPO Principles & Criteria Malaysian National Interpretation (MYNI)..
- (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 : 17 – 21 OCTOBER 2022

3. Site of assessment : TENNAMARAM CU

- Tennamaram POM
- Tennamram Estate
- Sungai Buloh Estate
- Bukit Talang Estate

4. Reference Standard :

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

5. Assessment Team

Audit team leader : Rozaimie Bin Ab Rahman (RAR)

Auditor :

- Mohd Zulfakar bin Kamaruzaman (MZK)
- Rohazimi Mat Nawati (RMN)
- Selvasingam T Kandiah (STK)
- Dzulfikar Azmi (DA)

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. 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: **Aug 2021 to Jul 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. For audits conducted during the transition period from 1 June to 31 July 2021, members are encouraged to use the updated

version but are also allowed to use the previous version (version 1.0). All audits conducted from 1 August 2021 onwards must use the updated Metrics Template (version 2.0).

9. 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.

10. 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.

11. Working Language : English and Bahasa Malaysia

12. 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.

13. 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

14. Assessment Programme Details : As below

Day 1: 17/10/2022 (Monday)

Time	Activities / areas to be visited			Auditee
9.00am	Opening Meeting (Tennamaram Estate) – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.			
9.30am	Briefing on the organization background and implementation of RSPO at CU (including actions taken to address previous audit findings) by company Management Representative. Logistics discussion to the sites to be visited.			Management Representative
9.45 am	To assign each audit team members – site (TENNAMARAM ESTATE) and the P&C requirements			
	RAR <ul style="list-style-type: none"> • RSPO Metric Template verification • GHG verification • Environmental practice <ul style="list-style-type: none"> o witness activities at site o riparian zone o SW management o Pollution prevention o Waste management 	RMN <ul style="list-style-type: none"> • Time bound plan and uncertified management units • Occupational safety & health practice <ul style="list-style-type: none"> o witness activities at site • Interview with workers, safety committee and contractors, supplier, etc • Legal compliance • Laws and regulations • Training and skill development programmes • Continuous improvement • Evaluate effectiveness of training conducted. 	STK <ul style="list-style-type: none"> • Good agriculture practices -site visit at harvesting, manuring, spraying, etc • IPM implementation, training and safe use of agro-chemicals. • Boundary observation • Land title • NDPE verification • Peat management 	
13.00pm	LUNCH BREAK / SOLAT ZOHOR			All
14.00pm	Continue assessment	Continue assessment	Continue assessment	Guide(s) for each auditor
16.00 - 18.00pm	Audit team discussion / Debrief meeting with client on issues (if any) / Discussion on potential NCRs / End of Day 1 audit			All

Day 2: 18/10/2022 (Tuesday)

Time	Activities / areas to be visited					Auditee
8.30am	Overview of current activities at Supply base sites (Sungai Buloh Estate)					Respective Scheme Manager
9.00am	To assign each audit team members – site and the P&C requirements					
	DA <ul style="list-style-type: none"> • Site visit and assessment on implementation: <ul style="list-style-type: none"> • Laws and regulations • Social aspects - SIA, management plan & implementation, workers' quarters. • Interview with employees, gender committee, worker representative, union representative, etc • Linesite inspection • Complaints and grievances 	RAR <ul style="list-style-type: none"> • RSPO Metric Template verification • GHG verification • Environmental practice <ul style="list-style-type: none"> o witness activities at site o riparian zone o SW management o Pollution prevention o Waste management 	RMN <ul style="list-style-type: none"> • Time bound plan and uncertified management units • Occupational safety & health practice <ul style="list-style-type: none"> o witness activities at site • Interview with workers, safety committee and contractors, supplier, etc • Legal compliance • Laws and regulations • Training and skill development programmes • Continuous improvement • Evaluate effectiveness of training conducted 	MZK <ul style="list-style-type: none"> • Site visit and assessment on implementation: <ul style="list-style-type: none"> • Social aspects - SIA, management plan & implementation, stakeholders. • Interview with local communities, contractors, suppliers. • Complaints and grievances on stakeholders • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • HCV Assessment management plan & implementation 	STK <ul style="list-style-type: none"> • Good agriculture practices -site visit at harvesting, manuring, spraying, etc • IPM implementation, training and safe use of agro-chemicals. • Boundary observation • Land title • NDPE verification • Peat management 	Guide(s) for each auditor

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13.00 pm	LUNCH BREAK	All
14.00 pm	To assign each audit team members – site and the P&C requirements	Guide(s) for each auditor
	Continue assessment	Guide(s) for each auditor
16.00 - 17.00 pm	Audit team discussion / Debrief meeting with client on issues (if any) / Discussion on potential NCRs / End of Day 2 audit	All

Day 3: 19/10/2022 (Wednesday)

Time	Activities / areas to be visited					Auditee
8.30 am	Overview of current activities at Supply base sites (Bukit Talang Estate)					Respective Scheme Manager
9.00 am	To assign each audit team members – site and the P&C requirements					
	DA	RAR	RMN	MZK	STK	Guide(s) for each auditor
	Site visit and assessment on implementation: <ul style="list-style-type: none"> Laws and regulations Social aspects - SIA, management plan & implementation, workers' quarters. Interview with employees, gender committee, worker representative, union representative, etc Linesite inspection Complaints and grievances 	<ul style="list-style-type: none"> RSPO Metric Template verification GHG verification Environmental practice <ul style="list-style-type: none"> witness activities at site riparian zone SW management Pollution prevention Waste management 	<ul style="list-style-type: none"> Time bound plan and uncertified management units Occupational safety & health practice witness activities at site Interview with workers, safety committee and contractors, supplier, etc Legal compliance Laws and regulations Training and skill development programmes Continuous improvement Evaluate effectiveness of training conducted 	Site visit and assessment on implementation: <ul style="list-style-type: none"> Social aspects - SIA, management plan & implementation, stakeholders. Interview with local communities, contractors, suppliers. Complaints and grievances on stakeholders Inspection of protected sites with HCV attributes Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone HCV Assessment management plan & implementation 	<ul style="list-style-type: none"> Good agriculture practices -site visit at harvesting, manuring, spraying, etc IPM implementation, training and safe use of agro-chemicals. Boundary observation Land title NDPE verification Peat management 	
13.00 pm	LUNCH BREAK					All
14.00 pm	To assign each audit team members – site and the P&C requirements					
	Continue assessment					Guide(s) for each auditor
16.00 - 17.00 pm	Audit team discussion / Debrief meeting with client on issues (if any) / Discussion on potential NCRs / End of Day 3 audit					All

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Day 4: 20/10/2022 (Thursday)

Time	Activities / areas to be visited					Auditee
8.30 am	Overview of current activities at Supply base sites (Tennamaram POM)					Respective Scheme Manager
9.00 am	To assign each audit team members – site and the P&C requirements					
	DA	RAR	RMN	MZK	STK	Guide(s) for each auditor
	Site visit and assessment on implementation: <ul style="list-style-type: none">• Laws and regulations• Social aspects - SIA, management plan & implementation, workers' quarters.• Interview with employees, gender committee, worker representative, union representative, etc• Linesite inspection• Complaints and grievances	<ul style="list-style-type: none">• RSPO Metric Template verification• GHG verification• Environmental practice<ul style="list-style-type: none">◦ witness activities at site◦ riparian zone◦ SW management◦ Pollution prevention◦ Waste management	<ul style="list-style-type: none">• Time bound plan and uncertified management units• Occupational safety & health practice witness activities at site• Interview with workers, safety committee and contractors, supplier, etc• Training and skill development programmes• Continuous improvement• Evaluate effectiveness of training conducted• Mill best practices	Site visit and assessment on implementation: <ul style="list-style-type: none">• Social aspects - SIA, management plan & implementation, stakeholders.• Interview with local communities, contractors, suppliers.• Complaints and grievances on stakeholders• Inspection of protected sites with HCV attributes• Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone• HCV Assessment management plan & implementation	<ul style="list-style-type: none">• Boundary observation• Land title• Laws and reg.	
13.00 pm	LUNCH BREAK					All
14.00 pm	To assign each audit team members – site and the P&C requirements					
	Continue assessment					Guide(s) for each auditor
16.0	Audit team discussion / Debrief meeting with client on issues (if any) / Discussion on potential NCRs / End of Day 4 audit					All

Day 5: 21/10/2022 (Friday)

Time	Activities / areas to be visited				Auditee
8.00 am	Overview of current activities at Supply base sites				Respective Scheme Manager
8.30 am	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	DA (Tennamaram Estate)	MZK (Tennamaram Estate)	RAR (Tennamaram POM)	RMN (Tennamaram POM)	
	Site visit and assessment on implementation: <ul style="list-style-type: none"> • Laws and regulations • Social aspects - SIA, management plan & implementation, workers' quarters. 	Site visit and assessment on implementation: <ul style="list-style-type: none"> • Social aspects - SIA, management plan & implementation, stakeholders. • Interview with local 	Site visit and assessment on Supply Chain Implementation incl. the <ul style="list-style-type: none"> • Model used • General Chain of Custody • System Requirements for the supply chain • Documented procedures 		

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	<ul style="list-style-type: none"> • Interview with employees, gender committee, worker representative, union representative, etc • Linesite inspection • Complaints and grievances 	<p>communities, contractors, suppliers.</p> <ul style="list-style-type: none"> • Complaints and grievances on stakeholders • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • HCV Assessment management plan & implementation 	<ul style="list-style-type: none"> • Purchasing and goods in • Outsourcing activity • Sales and goods out • Processing • Records keeping • Registration • Training • Claims <p>Interview with PIC SCCS, contractors, etc.</p> <p>#RMN conduct MSPOSC audit</p>	
12.30 pm	Lunch break / Solat Jumaat			All
14.30 pm	Continue assessment			All
16.00 – 17.00 pm	<p>Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager</p> <p>Closing meeting at CU / End of audit All</p>			All

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Attachment 3

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

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	Documented communication procedure at SOU Tennamaram continued to be implemented. At the time of the audit all requests for information from the stakeholders had been recorded. All the estates and mill audited provide availability of management documents i.e. related to environment, and social and legal issues to the public except for those prevented by commercial confidentiality or where disclosure of information that would potentially result in negative environmental or social outcomes. SDPSB 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 SDPSB website address is http://www.simedarbyplantation.com/ . For social programmes on education, environment, community and health, etc, Yayasan Sime Darby as the Foundation has expanded its wings from offering scholarships to outstanding and deserving individuals to funding impactful conservation, outreach and development programmes. The SDPSB website address http://www.yayasansimedarby.com/ .
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	Tennamaram CU has conducted meeting with the stakeholder to share any new information on RSPO certification, environmental, social, safety and legal requirement applied to all operating units. All the stakeholders have raised some issue and discussed with the management during the stakeholder's consultation.
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	Requests for information and responses were maintained accordingly through the inspections book and letters in the mill and supply bases. The Tennamaram CU continued to maintain the records of requests for information and responses are maintained which included the government agencies/ regulatory bodies, local communities, etc. below are some of the information requested and responses.

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Clause	Indicators	Comply Yes/No	Findings
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	<p>SOU Tennamaram has established a procedure in order to comply with the requirement and it describe the procedures and mechanism to be taken should any stakeholders (either external or internal) wish to communicate with the company on any issues concerning their interest:</p> <ul style="list-style-type: none"> i) Consultation Procedure ii) Carta Aliran Membuat Aduan Kepada Pihak Pengurusan iii) Carta Aliran Membuat Aduan Masalah iv) Carta Airan Aduan ke Pihak Atasan v) Carta Aliran Aduan (Grievance Procedure) vi) External Communications Procedure <p>The consultation and communication procedures were documented. External and internal communication procedures developed by Sime Darby Plantation for the estates and mill maintained to be followed and available at the audited sites.</p>
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	The stakeholder lists for all the units in SOU Tennamaram were all available and sighted during the surveillance audit. The lists were updated in January 2022, comprising of the internal & external stakeholders.
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	<p>The Tennamaram certification unit is subjected to Sime Darby Plantation Code of Business Conduct (COBC). It contains, among others, the following aspects of business conduct:</p> <ul style="list-style-type: none"> • Equal opportunity and non-discrimination • Criminal activities • Harassment ad violence • Avoiding conflicts of interests • Guarding against bribery and corruption • How to report a violation. • Anti-money laundering and anti-terrorism financing
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	Among the system in place to monitor compliance with of the COBC include internal audits conducted by the Group Integrity Governance Assurance Department, tender awards to be decided by tender committee to ensure independence and transparency; and vendor COBC developed to outline the standards of behavior 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.

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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	Generally, the CU maintains its compliance with relevant legal requirements.
	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	A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units Tennamaram CU. SQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance.
	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	Auditor has verified the boundary stone and pegs at Tennamaram, Sungei Buloh estate and Bukit Talang Estate. The boundary pegs/ trenching was visible along the boundary adjacent to another plantation area.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	YES	The list of stakeholders for the Mill and Estates in SOU Tennamaram was maintained by the respective sites. The stakeholders comprise of contractors, vendors/suppliers, neighbouring estates/smallholders, government agencies, clinics, hospitals, etc.
	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	The employment contracts and conditions of employment for contractor workers contained in employment contracts signed between the respective contractor on one hand, and their workers on the other. Among others, the contracts defined the regular working hours, deductions, overtime, EPF/SOCSSO contribution, sick leave, holiday entitlement, maternity leave, notice of termination of contract & time of payment of wages, etc. in compliance with Employment Act, 1955. All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements as verified through Online Vendor Registration (OVR) and the Vendor Code of Business Conduct (VCOBC) which apply to all contractors for due diligence and meeting legal requirements.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	YES	All contracts, contain clauses disallowing child, forced and trafficked labour as verified by audit team.

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Clause	Indicators	Comply Yes/No	Findings
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> Information on geo-location of FFB origins. Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license 	YES	Tennamaram Palm Oil Mill is an Identity Preserved Mill and therefore only receives and processes FFB from its own internal sources namely Tennamaram Estate, Bukit Talang Estate, Sungei Buloh Estate and other SD group of estates. No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.
	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	Tennamaram Palm Oil Mill continued to have documented management projection plans up to 2027. All 3 estates visited maintained to have minimum 5 years' business plans. The budget allocations at estates, include activities for operating expenditure i.e. upkeep, cultivation, harvesting & evacuation, welfare, other than that, capital expenditure, RSPO compliance, etc. Attention was given to crop projection, cost of production, cost per ton and per hectare indicators to monitor the performance of each operating unit. The cost of production was reviewed and compared against expenditure each year with projections in place for future years. While, provisions at mill, include the activities for milling process, general charges, RSPO compliance and capital expenditure.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	Replanting program was reviewed annually along with the with business plans. The decision for replanting was guided by Agricultural Reference Manual (ARM), agronomy department and approved by Plantation Monitoring Unit (PMU). Replanting programs for all estates for 2022 to 2027 was reviewed.

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Clause	Indicators	Comply Yes/No	Findings
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	Tennamaram CU continued to conduct Management reviews after their Annual RSPO/MSPO Internal audits. The Internal Audits were conducted by Sustainability Compliance Unit, Group Sustainability Department. The audit reports are made available to the management for their review. Management Review meetings were conducted by the respective Managers. Among the Issues have been discussed such as internal audits, matters arising from previous meeting, changes in regulations, standards, policies, & procedures related to sustainability management system, review on management plans, results from system audit & assessment, external audit, stakeholder feedback and complaints, resources for systems implementation, continual improvement plan, other matters, closing remarks).
3.2 The CU 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	SOU Tennamaram continued to use and implement SOPs for each of the processes. Brief version of the SOPs was displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOPs.
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	YES	Verification on the input inside RSPO metrics template including all the operating units under SOU 6 - Tennamaram certification unit were found accurate and reliable.
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	SOU Tennamaram continued to use and implement SOPs for each of the processes. Brief version of the SOPs was displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOPs. The ARM included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	Both the estates and the mill had established mechanisms to ensure consistent implementation of procedures. Some of the mechanisms are the internal audit, environmental compliance audit, regional General Manager report and monthly visit by the visiting engineer.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	Records of monitoring and actions taken by the estates continued to be maintained. This is to ensure that the established procedures were consistently implemented. Records of monitoring and actions taken by all 3 estates were maintained and kept for a minimum of 12 months. Sampled records sighted at the estates and mill during the conduct of audit.

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Clause	Indicators	Comply Yes/No	Findings
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	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 was no new planting in Tennamaram CU, hence no activities affecting the stakeholders. Environmental Aspect and Impact Assessment (EAI) and Social Impact Assessment (SIA) was conducted internally considering activities associated to estate and mill operations.
	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	<p>Social Impact Assessment (SIA) Report for Tennamaram CU (SOU 6 Tennamaram) was verified. The assessment was carried out at SOU Tennamaram on 17 – 19 June 2014 (Tennamaram Estate, Bukit Talang Estate and Sg. Buloh Estate). The SIA was done by Social & Environmental Project Unit, PSQM Department. The internal and external stakeholders were consulted during the assessment. The assessments were used methodology of interview workers based on workstation, harvesters, sprayers, worker representatives/NUPW, gender committee, contractor, supplier, local community, neighbouring estate/smallholders, government agencies, school. The SIA Report also included the baseline for socio economic data of all estates and mills and the social profile, as well as their stakeholders. The report also contained the estates' and mill's background information, labour policies, grievance procedures (internal and external), sexual harassment policies, facilities and amenities offered by the estates, and the social impact assessment procedures and results. The secondary data collection – document review/file checking also been made. The report includes both positive and negative impact and its recommendation.</p> <p>The CU has also established its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) which covers from upstream activities such as FFB reception until downstream processes was sighted during assessment. Identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the significant environmental aspects are the boiler stack emission, which is associated with air emission, palm oil mill effluent (POME) discharge (water pollution) and land contamination which related to the management of scheduled wastes and general waste. For estate operations, all activities from harvesting, pest and disease, upkeep program until delivery to mill have been identified.</p> <p>Both assessments have been developed with the participation of stakeholders.</p>
	3.4.3 (C) The social & env mgmt and monitoring plan implemented, reviewed & updated regularly in a participatory way.	YES	The social management action plans are being reviewed and updated on an annual basis at Tennamaram CU. This takes into account inputs from internal & external stakeholder meetings such as Social Dialog, NUPW meetings, OSH Committee meetings, as well as Women & Children Committee meetings. The SIA review process had included stakeholders' consultation with regards to social issues. Sighted the latest external stakeholders' minutes meeting for whole SOU 6 Tennamaram was conducted independently.

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Clause	Indicators	Comply Yes/No	Findings
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	YES	The recruitment process was clearly stated in the procedure where the recruitment was based age, medical fitness and etc. There is no any discrimination based on religion, gender, nationality and etc during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. Meanwhile, for promotion process are available for the local & foreign workers in the amended procedures under "Title: Career Progression for Workers Level". SDP also has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2nd December 2019, where the management is committed to contributing to a better society includes respecting, upholding & no-exploitation of fundamental human rights, providing safe and healthy workplaces and protecting workers' welfare and engaging and empowering communities.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	It was evident that the above-mentioned procedures are implemented, and relevant records are maintained.
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	Among the objective of the procedure to ensure CU compliance with all the regulation and minimize the risk of noncompliance. The mitigation plan also covered in the HIRARC documents. The hazard identification, risk assessment and risk control (HIRARC) procedure has been established. Tennamaram CU have conducted the risk assessment on all its operation as well as determining their control measures. Mitigation plans and procedures are documented and implemented accordingly.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	NO	The effectiveness of implementation health & safety plan has been monitored by periodically. All the precaution i.e. safety signboard, pictorial safety standards, PPE, etc has been published and display at workplace areas (notice board, muster call, etc). CU also monitored safety risk in workplace operation by monthly basis and quarterly basis. At TPOM Audiometric test has been carried out by 3 rd party for 53 workers. Result from assessment of on employee was abnormal hence, recommended by the OHD for retest in Mar 2022. The retest result was not available. Thus, Major NCR RAR 01 2022 has been raised.
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	YES	Formal training programs for 2022 that covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs were available for all the audited sites. The training plan for each operating units were established covered staff, workers, pregnant women, etc. A training need identification matrix has been established with target dates for the training identified.

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Clause	Indicators	Comply Yes/No	Findings
	understand, and which includes assessments of training.		
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	NO	SOU Tennamaram 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. Some of the training conducted in 2022 were reviewed. However, records of training related to Employment Act 1955 for contractor was not fully maintained. From interview session with owner of FFB Contractors and FFB Lorry and grievance noted from 2 FFB Drivers, it was found that the FFB Contractor has lack of awareness on Employment Act 1955 details, such as not implementing collective agreements, discrepancies of data in documentation of pay and condition, payment received not as per employment contracts and payslip is given to the workers upon request. <i>Therefore, Minor NCR DA 01 2022 was raised.</i>
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	YES	Appropriate training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been conducted in Oct 2022 by Regional Sustainability Quality Management (RSQM) attended by the PICs, Clerk, Assistant Engineer, Staff, Weighbridge Operator and Attendance list & photograph was seen. Training for contractor transporter has been carried out in the same month.

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	YES	Tennamaram Palm Oil Mill (TPOM) sourced for their FFB only from estates under the same SOU 6 which involve Tennamaram estate, Sungai Buloh estate and Bukit Talang estate. They also receive diverted certified crop from SOU 7 – Bukit Cheraka and Bukit Kerayong estates. The audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.		
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 rd party certified supply base.	YES	Not applicable since TPOM used Identity Preserved Model
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	YES	As provided in the report above – Table 3 (actual) & 4 (projection)

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	surveillance report.		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	YES	<p>The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. Their Palm Trace details are as followed;</p> <p>Member Name Member Name : Tennamaram Oil Mill Holding Name: SIME DARBY FUTURES TRDNG SDN BHD Commodity : Palm Oil</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable SC model specified. This shall include at min the following:</p> <ul style="list-style-type: none"> • Complete and up to date proc covering the implementation of all the elements of the SC model reqs. • Complete and up to date records and reports that demonstrate compliance with the SC model reqs. • Identification of the role of the person having overall responsibility for and authority over the implementation of these reqs. and compliance with all applicable reqs. This person shall be able to demonstrate awareness of the organization's proc for the implementation of this standard. • The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 	YES	<p>'Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia" document ID: SD/SDP/GSD/SCCS/0522/01. The procedure described the following:</p> <p>Clause 3.0 ~ Scope</p> <p>Clause 4.0 ~ The responsibility of for the implementation of RSPO SCC i.e. head of operating unit</p> <p>Clause 5.0 ~ Control of document & records such as weighbridge tickets, consignment note, training record & contracts. Record retention for 10 years. Define the critical control point (CCP): estate – weighbridge, mill – weighbridge, admin office, ramp, CPO despatch area, CPO storage tank. Kernel silos.</p> <p>Clause 6.0 ~ Delivery of FFB from the estate – relevant record involved, flowchart for crop diversion, list of mill and their supply chain model i.e. IP or MB</p> <p>Clause 7.0 ~ Receiving FFB at the mill – list of supply base, rules for determining diverted FFB destination, relevant record</p> <p>Clause 8.0 ~ ISCC Compliant waste / residues materials</p> <p>Clause 9.0 ~ Process monitoring – for IP model mill need to ensure no mixing of RSPO certified and non-certified and MB model</p> <p>Clause 10.0 ~ product despatch – [Clause 9.1] all delivery of CPO and PK shall be in accordance with the contract allocated by Global Trading & Marketing (GTM) department</p> <p>Clause 11.0 ~ Non-conforming material / product – requirement to downgrade the RSPO Product</p> <p>Clause 12.0 ~ Product claim – shall follow RSPO rules on market communication & claim</p> <p>Clause 13.0 ~ Outsourced contractor - the mill has established list of outsourced contractor.</p> <p>Clause 14.0 ~ Training – the mill shall provide training for relevant personnel carrying the task at tech critical control point (CCP).</p> <p>Clause 15.0 ~ Reclassification of mill's supply chain model - Reclassification of mill's supply chain model may be determined by GTM/ PSQM. CB shall be notified. All communicated shall be recorded.</p> <p>Clause 16.0 ~ Production volume</p> <p>Clause 17.0 ~ Conversion Factors</p> <p>Clause 18.0 ~ Internal Audit</p> <p>Clause 19.0 ~ Complaints</p> <p>Clause 20.0 ~ Management Review</p> <p>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. Appropriate training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been conducted in Oct 2022, by Regional Sustainability Quality Management (RSQM).</p> <p>Letter of Appointment as Person in Charge for Environmental/ Quality Management Systems (inclusive of RSPO SCCS) for Assistant Manager has been sighted.</p> <p>TPOM had continued to implement the procedures it had on receiving and processing of RSPO certified and non-certified FFBs. (Refer para. 7.0 of the SOP - Receiving FFB at the Mill) it has described how TPOM manages the FFB from certified source</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Effectively implements and maintains the standard requirements within its organisation. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct NC shall be subject to mgmt review at least annually. The organisation shall be able to maintain the internal audit records and reports. 	YES	<p>Internal audit procedure is available. Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2020 requirements.</p> <p>RSPO internal audit was conducted in Aug 2022 by the 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 1 NCR were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.</p> <p>The management review procedure is available and it will be conducted once a year. Management review meeting has been conducted in Sept 2022 (combine RSPO, RSPO SCCS and MSPO)</p> <ul style="list-style-type: none"> Internal audit – 1 NCR (SCCS only) Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result achieved. Previous meeting – was highlighted Changes – There is no significant changes. Recommendation for improvement – improve the established system
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</p>	YES	<p>Tennamaram POM had continued to receive certified FFB from own SOU Estate Which is Sg Buloh Estate, Tennamaram Estate, and Bukit Talang Estate and another certified SOU Estate Bukit Cheraka Estate and Bukit Kerayong Estates. The validity of the certificate of the supplier has been checked accordingly. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Monitoring records titled as “RSPO & MSPO Mass Balancing Records for Oil Mills” has recorded the tonnage of certified FFB and its supplying estate.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>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>		
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 spec documentation):</p> <ul style="list-style-type: none"> a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; 	YES	<p>The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Sime Darby Plantations Berhad and Global Trade Marketing Department (HQ) on behalf of Tennamaram POM. Documented procedures related to sales and goods out were sighted and found adequate. Based on verification during the audit, TPOM has deliver certified materials to end buyer such as Sime Darby Oil Carey (SDOC), Sime Darby Plantation Agri-Bio Sdn Bhd, Sime Darby Biodiesel Services Sdn Bhd and for crude palm oil SDOC KCP.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number		

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling actvt. 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 cert shall ensure that the ind. third party complies with relevant reqs 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 comm to the relevant contractor.</p> <p>d) The mill shall ensure that ind. 3rd parties engaged provide relevant access for duly accredited CBs to the respective ops, systems, and all info, when this is announced in advance.</p>	YES	<p>There are 2 outsource company CPO transporter. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. There is a clause regarding Supply chain in the 'annexure 5' of agreement. Record of training conducted in May 2022 for transporter contractor was sighted by the auditor.</p> <p>There is addendum contract document between TPOM 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 disallowed child labour, forced labour, trafficking labour, equal opportunity, etc</p> <p>The RSPO Supply Chain procedure has described on Para 13.0 Outsource Contractor and briefed to the contractor in Oct 2022. Inspection was carried out as additional effort to ensure no contamination sighted book at AP Post and addendum contract document between TPOM 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 disallowed child labour, forced labour, trafficking labour, equal opportunity, etc</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	YES	List of contact person for both transporters were made available and up-to-date in the stakeholder list. And was updated in Jan 2022.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	NO	There was new appointed adhoc contractors for transportation however, TPOM not inform CB in advance of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products. Thus, #Major NCR RAR 02 2022 has been raised
3.8.12	The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	YES	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up-to-date.
	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory reqs and be able to confirm the certified status of raw materials or products held in stock.	YES	Relevant record was maintained for more than 3 years as per Standard operating procedure for Sustainability Supply Chain and Traceability, 5.0 control of documents & records
	iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified	YES	Sighted record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	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 CU used IP model
3.8.13	Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to	YES	TPOM 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).

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	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.		OER & KER has been updated by daily basis and monthly summary has been used as guidance.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	YES	
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	YES	<p>Marketing department responsible for the purchase and sell of raw material and finished product respectively. Relevant information will be provided to TPOM for reference on site.</p> <p>The dispatch of the RSPO certified CPO/ PK to buyer by TPOM were made based on agreement, as per noted in sales contract.</p> <p>The receiving pit, pipelines and tanks in TPOM were thoroughly cleaned, swept and flushed before RSPO certified CPO was pumped in to avoid contamination. Dedicated tanks were used to store RSPO certified CPO from TPOM. The same practice occurs for separate handling of certified palm kernel.</p>
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	YES	<p>i-Samples of shipping announcement had been verified during the audit.</p> <p>ii-Based on verification through RSPO IT Platforms - Palm Trace transaction report -Certificate Allocation Log - there was no activity removed for RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage.</p>

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

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Principle 4: Respect community and human rights and deliver benefits

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

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	YES	Sime Darby Plantations Berhad's Human Rights Charter provides for protection of Human Rights Defenders, whistle blowers, complainants and community spokespersons. And, the Group has established a specific Policy on Human Right Defenders, Whistleblowers and Complainants. This policy was communicated to all levels of the workforce and operations on Tennamaram CU. While for FFB suppliers, local communities, and contracted services had been briefed on prohibits intimidation and harassment by the unit of certification during stakeholders meeting.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	It has been verified that the land is now legitimately owned by SOU Tennamaram since since 26 July 1924. The audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed with villager representatives and it was confirmed that there is no evidence that the oil palm operations have instigated violence or use any form of harassment in maintaining peace and order in their current and planned operations.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	NO	<p>The system used by the SOU 6 Tennamaram in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Procedures for handling Social Issues". The Mill and Estates within SOU 6 each have its own Internal Complaint Book and External Communication Book. The Internal Complaint Book was used for employees to lodge complaint pertaining to their houses, and there is evidence that the complaints were resolved in a timely and appropriate manner. The external book was reviewed and found no complaints against the CU. Anonymity of complainants and whistleblowers are ensured under the Sime Darby Code of Business Conduct which provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ.</p> <p>The mutually agreed system which open to all affected parties on resolves disputes in an effective, timely and appropriate manner, is not effectively implemented to contractors' workers. Interview session with contractor workers found that they had lack of understanding on pay and condition, employment contracts and related documents (i.e., detailing payment, payroll documents, providing accurate information on compensation for all work performed). In addition, the others grievance system such as Suara Kami/whistleblowing was not fully understood by sampled contractor workers. <i>As a result, Major NCR DA 01 2022 was raised</i></p>

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Clause	Indicators	Comply Yes/No	Findings
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	Based on interview with stakeholders, it has been confirmed that the system was understood by the affected parties.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	YES	The Tennamaram CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to internal & external stakeholders.
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	YES	The system used by the SOU 6 Tennamaram in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Tatacara Perundingan Dalam Menangani Masalah Sosial". The Mill and Estates within SOU 6 each has its own Internal Complaint Book and External Communication Book. The Internal Complaint Books are for employees to lodge complaint pertaining to their houses. The external book was reviewed and found no complaints against the CU. The conflict resolution mechanism includes the option of access to independent legal and technical advice. The complainants may choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. When ensuring anonymity of complainants and whistleblowers, the Sime Darby Code of Business Conduct provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ.
4.3 The CU contributes to local SD 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	Contributions to community development that are based on the results of consultation with local communities during stakeholders meeting are demonstrated.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	YES	Evidence of legal ownership of the land including history of land tenure was verified during this audit. For Tennamaram, Sungei Buloh and Bukit Talang Estate the land was previously owned by Kumpulan Guthrie Berhad and Golden Hope. It was then transferred to Sime Darby after the merger in 2007. Kumpulan Guthrie Berhad and Golden Hope has bought the land from Selangor State government since 26 July 1924. Each estate had legal use of the land through an Ownership signed by the Lands and Surveys of Kuala Selangor following the payment of premium and Land fee.

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Clause	Indicators	Comply Yes/No	Findings
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Tennamaram since 26/7/1924. The audit team had confirmed that there were no land issues related to previous owners.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	YES	
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	YES	
	4.4.2c Evidence that the legal, economic, environmental and social 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	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Tennamaram since 26/7/1924. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community, and confirmed that

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Clause	Indicators	Comply Yes/No	Findings
	participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).		there is no issue regarding land and neighboring estate. Hence, no mapping required.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Tennamaram since 26/7/1924. The audit team had confirmed that there were no land issues related to previous owners. Hence, the requirement does not apply.
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	YES	As above.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	As above.
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views	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 6 Tennamaram and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by SOU Tennamaram since since 26/7/1924. The audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed with villager representatives and it can be concluded that there were no operations on villagers' land at SOU Tennamaram. Hence, this requirement does not apply.
	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	YES	As above.

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Clause	Indicators	Comply Yes/No	Findings
through their own representative institutions.	access to independent advice through a documented, long-term and two-way process of consultation and negotiation.		
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	YES	As above.
	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.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	YES	As above.

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Clause	Indicators	Comply Yes/No	Findings
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	YES	As above.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	YES	There were no new lands acquired for plantation and mills after 15/11/2018. The current operation area including mill and estates as per stated in the land title.
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System, entitled "Procedures for Handling Boundaries Disputes". In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	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 Tennamaram SOU. 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	YES	There were no affected parties that need any negotiated agreements, compensation and payments.

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Clause	Indicators	Comply Yes/No	Findings
	documented, with evidence of the participation of affected parties, and made publicly available to them.		
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	YES	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 and documented and made available to affected parties.	YES	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighbouring estate.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	It has been verified that the land is legitimately owned by SOU Tennamaram since 26/7/1924. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
4.8 The right to use the land is demonstrated and is not legitimately 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 SOU Tennamaram since 26/7/1924. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired	YES	Land conflict is not present in the area of the unit of certification.

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Clause	Indicators	Comply Yes/No	Findings
	plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.		
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant reqs.	YES	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities where applicable).	YES	There was no conflict or dispute over the land.

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 CU 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	Fresh Fruit Bunches were supplied from SDPB owned estates (Tennamaram, Bukit Talang & Sungei Buloh Estate) which are certified to RSPO. There was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	As above. Thus, no contract involved with smallholder.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	Fresh Fruit Bunches were supplied from SDPB owned estates (Tennamaram, Bukit Talang & Sungei Buloh Estate) which are certified to RSPO. There was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.

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Clause	Indicators	Comply Yes/No	Findings
	5.1.4 (C) Evidence is available that all parties, incl. women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/ credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	YES	Fresh Fruit Bunches were supplied from SDPB owned estates (Tennamaram, Bukit Talang & Sungei Buloh Estate) which are certified to RSPO. There was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	There is an existing contract valid until Dec 2023 with these contractors' representatives had confirmed their understanding of their rights and obligations under the contract. Both contractors confirmed the fairness of the terms of their contract, and payments are usually received within 7 to 10 days of invoice issuance.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	These contractors interviewed confirmed that payments are made in a timely manner, namely within 7 to 10 days of invoice.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	Weighing Equipment in Tennamaram POM has been calibrated in yearly basis via the service provided by Metrology Corporation Malaysia Sdn Bhd.
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	YES	Sime Darby SOU Tennamaram supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Sighted that latest Engagement meeting for smallholder RSPO/MSPO to promote on RSPO certification. However, currently the Growers and villagers were not in favor in the implementation due to high cost. Their only focus for MSPO first.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	YES	Mechanism available through, "Flowchart and Procedures on Handling Land Disputes", Flowchart and Procedure on Handling Social Issues".
5.2 The unit of	5.2.1 The unit of certification consults with interested smallholders (irrespective of	YES	Sime Darby SOU Tennamaram supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the

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Clause	Indicators	Comply Yes/No	Findings
certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	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.		smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Sighted that latest Engagement meeting for smallholder RSPO/MSPO to promote on RSPO certification including women or other partners in their supply base to assess their needs for support to improve their livelihoods and to promote certification. However, the Growers and villagers were not in favor in the implementation due to high cost. Their only focus for MSPO first.
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	YES	As above.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	As above. Not applicable.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	As above. Not applicable.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	Currently Sime Darby SOU Tennamaram has created a system to trace their stakeholder around their estates. But so far smallholder and Growers in SOU Tennamaram Area doesn't want to involve because of financial restriction. But Sime Darby SOU Tennamaram do have a report and always publicly available in their website.

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,	YES	SDPB have implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director. The policy shall be guided by the commitments spelt out in the Company's in Human Rights Charter (HRC) where stated promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual

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Clause	Indicators	Comply Yes/No	Findings
	gender, sexual orientation, gender identity, union membership, political affiliation or age.		orientation, gender identity, union membership, political affiliation or age. SDPB according to the statement, also will facilitate opportunities for advancement for their employees, especially women by removing barriers to progress and respecting reproductive and maternal rights.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Apart from the indicator 6.1.1 policy which states that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees. As confirmed by the workers during interviews and field observation, payment of wages/salaries, provision of housing and access to benefits and amenities is fair based on observation, review of pay checks, contracts of employment, including charging of recruitment fees for migrant workers. Furthermore, SDP already established new SOP Migrant Worker responsible Recruitment Procedure as mechanism and guidelines to ensure no charging of recruitment fees.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	YES	SDP has established the Career Progression for Workers Level (both local and foreign workers), where the promotion of workers is based on the work performance, suitability and the leadership quality of the worker. For requirement, SDP has established the Hiring of Local Workers procedure and Workforce Management Unit Liaison & Recruitment procedure to explain the recruitment processes for both local workers. There is no promotion for the year 2022. There is no any discrimination based on religion, gender, nationality etc., during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder's consultation, worker's interview, complaint book and trade union meeting. Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	YES	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.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organization and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly. SDPB has introduced the new Terms of Reference (TOR) for Gender Representatives and Gender Committee, where in this new TOR, a more definitive roles, and responsibilities as well as governance structure and programmes were added in. Gender Committee were established by the mill and estates management and verified at each operating unit. Meetings or activities to be conducted once every 3 months or whenever necessary according to the new TOR.

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Clause	Indicators	Comply Yes/No	Findings
	6.1.6 There is evidence of equal pay for the same work scope.	YES	Interview with workers local female/male and migrant male (India, Bangladesh and Indonesia), they agreed that they have received equal pay for the work given. For example, sprayer gang has been paid by piece rate and the same gang also receive the piece rate pay. For harvester also they received the same rate for all harvesters in the estate. Any differences for the pay rate will be for tall palm and the short palm. For mill and estate general workers they receive daily payment as per Minimum Wages Order Amendment 2022. Based on interview and documentation records, there are evidence that equal pay for the same scope of the job.
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	For Tennamaram CU documentation of pay is in the form of monthly pay slips. Conditions of pay are contained in the workers' respective employment contracts. Labour laws, union and/or other collective agreements detailing payments and other conditions, was made available in the languages understood by the workers and explained to them by a management during induction. Each pay slip documents the name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions (statutory such as EPF, SOCSO, EIS, electricity), net salary, annual leave and medical leave taken, etc. Samples of payslips for samples worker were sighted and verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages Order (Amendment) 2022.
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	YES	Contracts and conditions of employment are contained in employment contracts signed between the Mill and respective estates on one hand, and their workers on the other. The employment contracts sampled were prepared in either Bahasa Malaysia/Indonesia/Bangladeshi/Indian or in dual-language, namely English and the language commonly used in the worker's country of origin. Among others, the contracts defined the place of work, wages, working hours, medical, accommodation, reasons for dismissal/termination, SOSCO, recruitment free, holiday entitlement, rest day, sick leave, annual leave, maternity leave (for local worker only) workplace transportation, resignation, safety & health, others Labour regulation and compliance, complaint and others term and conditions. For all workers, there is evidence that the payment of statutory contributions such as EPF (for local worker only), SOCSO and Employment Insurance Scheme (for local worker only), are being made in accordance with the relevant legal provisions. The sampled contracts sighted during the audit were as indicator 6.2.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	YES	The Tennamaram CU has complied with legal requirements and Collective Agreement under MAPA/NUPW Agreement on The Wages of Harvesters, Harvesting Kanganies, Loaders and Other Loaders on Oil Palm Estates 2019 & MAPA/NUPW Field and Other General Employees and Fringe Benefit Agreement 2019, for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. For overtime, it has been mutually agreed upon between the management and workers and met the legal

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Clause	Indicators	Comply Yes/No	Findings
			requirements. Overtime will be offered when there is additional job and no discrimination observed.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	YES	The Tennamaram CU provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to all workers stipulated with Workers Housing Management Procedure. Linesite inspection was conducted weekly by the PIOA and EWR team in Tennamaram CU and using the Housing Complex/ Nest/ Community Hall Weekly Inspection Checklists. Any issues found during the inspection was remarked in the checklist and action will be taken accordingly. Besides that, there was a quarterly Housing Unit Inspection carried out by the Employees Welfare Committee.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	All the workers have provided with 10kg of rice once every two months as per company's policy. Interviewed with the workers confirmed that they are easily access to adequate, sufficient and affordable foods where the estate sundry shop.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following: • An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.	YES	SOU Tennamaram has followed the MAPA/NUPW Agreement 2019 which is payment of the wages following the Minimum Wages Order Amendment 2022. As per current situation in Malaysia, all workers in SOU Tennamaram have been paid by following the Minimum Wages Order Amendment 2022. Prevailing wages per months calculations based on SOU basis. The total received per months for Local Workers is RM 1,967.95 and for Migrant Workers RM 2,020.49.

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Clause	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> There is annual progress on the implementation of living wages Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>		
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	Employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.2.1 above. No casual, temporary and day labour employed within all operating units within SOU 6 Tennamaram.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	YES	Recognition of freedom of association is available in SDP's Human Rights Charter 2020. Paragraph 3.2.4 states commitment to respect freedom of association, respecting the rights of employees to form and join unions and bargain collectively. Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively and the workers have their freedom to join the NUPW/MAPA union.
	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	YES	The National Union Plantation Workers (NUPW) is the union that represents workers of Tennamaram SOU 6 CU. Union membership is open to both local and foreign workers and the workers' representative elected by the NUPW/MAPA itself which is independent party.

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Clause	Indicators	Comply Yes/No	Findings
and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	and/or Bahasa Malaysia) and made available upon request.		At Tennamaram CU, latest meeting minutes between NUPW members and employer was conducted and minutes of meetings were verified during audit. It was attended by management representatives, NUPW representative and workers representative, etc. The Social Dialog was introduced and implemented at Tennamaram CU to comprising POM/estate management and worker representatives who have been elected by the workers themselves as a communication channel between management and workers. The interval meeting was carried out by forthrightly basis. This also been implemented due to impact assessment. Main reason to gather the information such as feedback from the workers in term of Social, Safety, Environmental, Welfare issues, etc. All the feedbacks were highlighted in the minutes meeting and Social Dialog Online Tracker (SDTS) for tracking system and action plan.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	YES	Interview with workers union representatives (NUPW Chairman & NUPW Secretary) and workers representative from Social Dialog confirmed that they were independently elected as the NUPW/Social Dialog by all members of NUPW/Social Dialog among mill and estates workers via an election without interference by the management.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	YES	The Group Sustainability & Quality Policy Statement signed by Group Managing Director has addressed the required.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	YES	There was no evidence that the estates and the mill at SOU Tennamaram has employed anyone below the age of 18 years. Auditor also verified through the contractors in the SOU Tennamaram and confirmed there was no contractor workers available in the estate and mill.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	There was no evidence that the estates and the mill at SOU Tennamaram has employed anyone below the age of 18 years or young persons.
	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,	YES	The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders.

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Clause	Indicators	Comply Yes/No	Findings
	smallholders, FFB suppliers and communities where workers live.		
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	Sime Darby Plantation has developed Human Rights Charter where they create a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. Together with the sexual harassment procedure, HRC, ILO indicator was communicated through the morning muster briefing to all workers and placed publicly in the notice board at housing area and office. It is also being explained during the induction course for the newly arrived workers.
	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	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They facilitate opportunities for advancement for their employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights.
	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	As verified during on-site interview with relevant stakeholders, management of mill and estates within SOU 6 conducted the assessment of new mothers in consultation with new mothers and taken actions to address their needs as per sample for Sg. Buloh Estate new mothers needs assessment.
	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. 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"> Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees Contract substitution Involuntary overtime 	YES	The Workers Agent agreement with Sime Darby Plantation for Indonesia & India agencies, has been listing detail regarding the fee charges to the workers which is Medical, Passport, Card, Transportation, Insurance, Visa, ISC, Flight Ticket and Shirts. Interviewed with India and Indonesia workers also they understand regarding these charges, and they satisfied with them. The agent confirm that they only take service fee only for workers the others fee is for passport, visa, medical, food, transportation from village and flight ticket. Interview with new workers at Tennamaram, Bukit Talang and Sungei Buloh Estate confirmed this. workers also understanding that they need to do all the above to go to Malaysia, and the agent also already explained to them regarding the work they should get in Malaysia which is in oil palm plantation.

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Clause	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 		<p>But auditor also already interviewed with India workers in the SOU Tennamaram they have to pay 60,000 Indian Rupee to enter Malaysia and they know that money use for their passport, Identity Card, transportation, place before departing, food, medical checkup, Insurance, Visa and Flight Ticket. Based on interviewed workers, their recruitment agent had explained and show picture of oil palm plantation work/activity to them that they are going to work in Plantation Sector, and they satisfied with their earning at Sime Darby.</p> <p>Lastly, SDP already established new SOP Migrant Worker responsible Recruitment Procedure as mechanism and guidelines to ensure no charging of recruitment fees.</p>
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	SDP has implemented a Sime Darby's Human Rights Charter and can be easily access via www.simedarbyplantation.com . All the local and foreign workers will be provided with induction training prior to work. Besides, they were provided with decent living condition and free from any discrimination. The workers informed that they were treated equally without any discrimination. No contract substitution has occurred through interviewed with the workers.
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	YES	<p>Estate / Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Manager subsequently assigned duties of ESH coordinator to the Assistants or healthcare assistant for the down line implementation of ESH practices in the estate and mill. All identified Executives were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. Procedure to assist safety & health committee was established "safety & health committee procedure".</p> <p>Occupational Safety Health (OSH) Committee has been established together. The OSH committee organization chart for 2022 was available. The Estate/Mill Manager is the chairman, and the Mill Engineer/Assistant Manager and HA is the secretary. OSH Committee meetings were held once in three months.</p> <p>Workers during the meeting participated in the discussion mainly online site and safety. All units adopted the agenda as released GSD. This agenda list was sighted and adequate to discuss salient issues relating safety, environmental and health.</p>
	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	YES	<p>Accident and emergency procedures are available in adherence to the SPSB policy on 'Crisis Management & Emergency Response', PQMS, OSH manual and 'Accident and Reporting and Investigation Procedure' in chapter 14 of the same manual and SOP incidents, accidents, & non-compliance are available. Each estate and mill had procedures emergencies situation as listed below in the table. There was formation of ERP Team & ERP for all the identified incidences. The organisation chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedure's guidelines were produced by GSD and amended to tailor to difference situation in the estates and mills.</p>

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Clause	Indicators	Comply Yes/No	Findings
	both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		<p>The trained personnel for the First Aid were among the employees working in the mill on shift and also the estates staff/mandores. The first aid boxes were available at various points in the mill complex including laboratory, office, workshop, process control room etc. Similarly, the estates distributed the first aid box to the mandores and brought along to the field during operations. In addition, there are also first aid boxes kept in the office, store and workshops.</p> <p>Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Manday MC). This is summarized officially in the JKKP 8. Records are kept in the office. Summary for the year is described in the JKKP 8 a mandatory requirement for submission to DOSH by Jan of the subsequent year. Cases if any are reviewed during safety meetings. Where required submissions of JKKP 6, 7 & 8 to DOSH were compiled under the legislative requirement. Investigations and revision of HIRARC where appropriate were made accordingly.</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>All workers involved in potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. From interviews conducted with workers and staffs in the field and stores clerks it was established that they had been trained and were aware of safe handling procedures.</p> <p>Sanitation facilities for spraying and manuring operator was available at the store area with facilities such as shower room, washing machine, PPE rack, soap, etc. All the workers are understood and aware related to SOP after chemical application.</p>
	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	<p>The Mill and Estates provide medical care and insurance coverage for all the workers under SOCSO. In addition, the estates and mill provide medical care to all workers using own Medical Assistant services. Cases requiring additional/serious treatment are referred to Hospital Tanjung Karang 30 km away.</p>
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	<p>Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Manday MC.) This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKKP 8 a mandatory requirement for submission to DOSH by Jan of the subsequent year.</p>

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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	As for all SDPB estates, Tennamaram Estate, Bukit Talang Estate and Sungai Buloh Estate had in place documented integrated pest management (IPM) systems. The procedure referred was in the Agricultural Reference Manual (ARM) Section 15 - Plant Protection. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. The IPM technique for rats includes rearing barn owls (<i>tyto alba</i>), bagworm control includes the planting of beneficial plants such as <i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Turnera sublata</i> and for rhino beetles is by using pheromone trap. All estates carried out monthly detection and observation of leaf eating pests, rat damage and diseases like Ganoderma. These detection and observations were carried by staff. When damaged/disease was observed, proper census was then carried out. Records showed no outbreak had been taken place. Rat baiting was by calendar baiting at 2 campaigns per year. Baiting was continued until bait acceptance fell below 20%.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	There was no evidence that species referenced in the Global Invasive Species Database and CABI.org are to be used in managed areas, as per site visited and as per the stakeholder consultation with relevant workers.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	YES	All Estate in Tennamaram CU continued to use the Sime Darby Plantation Berhad's policy of no open burning. As advocated, all estates practiced Zero burning thus no use of fire for pest control. Furthermore, there had been no serious pest damage in all 3 Estates visited.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	Justification of all pesticides used is demonstrated on Tenamaram CU. Selective products and application methods that are specific to the target pest, weed or disease are prioritized. Tennamaram CU continued to use agrochemicals based on its Agricultural Reference Manual (ARM).
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	YES	All estates continued to have records to show the types of pesticides used with active ingredients and their LD50, where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is	YES	All estates continued to minimise the usage of agrochemicals by implementing IPM.

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Clause	Indicators	Comply Yes/No	Findings																																				
	minimised as part of a plan, eliminated where possible, in accordance with IPM plans.		Blanket spraying was not practiced by this CU and soft grasses maintained in the field. It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section 15 -Plant Protection. As part of the IPM plans, management of all estates had established nectariferous beneficial plants (<i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Turnera subulata</i>) nurseries for continuous planting in order to attract natural predators and thus to reduce use of insecticides. During the visit it was observed a number of beneficial plants had been planted and all 3 estates had plants ready for planting in the nurseries.																																				
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	Prophylactic use of pesticides as identified in national best practice guidelines was in use in replanting areas and in Oil Palm Nurseries. In immature oil palm areas prophylactic spraying using diluted cypermethrin was carried out against Rhinoceros beetles as per SOP.																																				
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	YES	<p>The estates confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000. The chemical used in the estates among others as listed below;</p> <table><tr><th></th><th>Chemical name</th><th>Class</th><th></th><th>Chemical name</th><th>Class</th></tr><tr><td>1</td><td>Glyphosate isopropylamine</td><td>III</td><td>6</td><td>Cypermethrin</td><td>III</td></tr><tr><td>2</td><td>Sodium chlorate</td><td>III</td><td>7</td><td>Acephate</td><td>III</td></tr><tr><td>3</td><td>Glufosinate ammonium</td><td>III</td><td>8</td><td>Malathion</td><td>III</td></tr><tr><td>4</td><td>Triclopyr butoxy</td><td>III</td><td>9</td><td>Indaziflam</td><td>III</td></tr><tr><td>5</td><td>Metsulfuron methy</td><td>IV</td><td>10</td><td>Bayfolan</td><td>III</td></tr></table>		Chemical name	Class		Chemical name	Class	1	Glyphosate isopropylamine	III	6	Cypermethrin	III	2	Sodium chlorate	III	7	Acephate	III	3	Glufosinate ammonium	III	8	Malathion	III	4	Triclopyr butoxy	III	9	Indaziflam	III	5	Metsulfuron methy	IV	10	Bayfolan	III
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	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	As mentioned above in 7.2.5 of this checklist and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. The Estates had only used Class III and Class IV chemicals. Hence, the need for a judgment of the threat and verification as to it being a major threat does not apply in Tennamaram CU.																																				
	7.2.5b Why there is no other alternative which can be used.	YES	As mentioned above in 7.2.5 of this checklist and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need to assess other alternatives is not required.																																				
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES	As mentioned above in 7.2.5 of this checklist and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used.																																				

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Clause	Indicators	Comply Yes/No	Findings
			Hence, the need as to which process was applied to verify why there is no other less hazardous alternative are not required
	7.2.5d What is the process to limit the negative impacts of the application.	YES	As mentioned above in 7.2.5 of this checklist and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need to limit the negative impacts of the application does not arise.
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	As mentioned above in 7.2.5 of this checklist and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need to estimate timescale of the application and steps taken to limit application to the specific outbreak does not arise.
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	YES	Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the product. The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were all trained and that they had understood the hazards involved and how the chemicals should be handled in a safe method. The trade and generic names of the chemicals were made known to the workers through the SDS training. SDS was also displayed at all storage areas as observed during the audit.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	The chemical stores in all 3 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). Records of purchase, storage and used were maintained. All the stores were equipped with exhaust fans and the door was secured and keys held by only the storekeeper and attendant. Only authorized personnel are allowed to handle the chemicals. All chemicals were segregated and stored accordingly, and fertilisers were well stacked. Relevant MSDS/CSDS were available in the stores. Empty pesticides containers were triple rinsed, holes punched in them and stored separately in the scheduled wastes store awaiting proper disposal.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	At Tennmaram Estate and Bukit Talang Estate empty containers chemical has been disposed through programme "empty chemical recycling programme" by SS Setia Teknologi Enterprise (approved by Jabatan Pertanian Baqhagian Kawalan Racun Perosak and DOE).
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable	YES	Aerial application of agrochemicals is not practiced in all SDP estates in the CU. This is confirmed through observation during the site visit and interviews with the employees at Tennamaram, Sungai Buloh and Bukit Talang Estates.

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Clause	Indicators	Comply Yes/No	Findings
	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.		
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	Medical surveillance has been carried out by third party. Results from the assessment does not show any acute toxicity symptoms. In addition to that biological monitoring results for pesticide are normal.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	YES	All the estates in the CU complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation whereby; No work with pesticides was offered to pregnant or breast-feeding women. <i>Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan</i>). The estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	YES	SOU Tennamaram has identified all wastes and sources of pollution. The Waste Management Action Plan FY 2022 were established to mitigate and control the identified wastes and source of pollution. Some of the action taken and implemented as follows: <ul style="list-style-type: none"> • Air emission has been controlled by mill by installed the ESP to captured particulate emission from boiler emission • Final discharge water has been monitored by monthly basis by accredited laboratory and reported to DOE. • SW has been disposed through DOE contractor and domestic waste has been disposed through Majlis Daerah Kuala Selangor.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	NO	The organization had established procedure handling of scheduled waste. At time of audit, the whole operating unit disposed scheduled waste for machineries collected by Sime Darby Industrial Sdn Bhd. It was noted that some non-conformities were found during audit and Minor NCR RMN 02 had been raised.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	At Tennamaram SOU domestic waste for line site and office has been disposed through Majlis Daerah Kuala Selangor 3 times per week.
7.4 Practices maintain soil fertility at, or where improve soil	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	Fertilizer application, which was of paramount importance for maintenance of soil fertility, were carried out based on the recommendation made by the agronomist from Sime Darby Research Sdn. Bhd. Annual fertilizer recommendations were made based on annual foliar sampling while soil sampling was carried out on a 5-year cycle basis by Sime Darby Research Sdn. Bhd. The recommendation by the Agronomist were also available during the

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Clause	Indicators	Comply Yes/No	Findings
fertility to, a level that ensures optimal and sustained yield.			inspection and the application of fertilizers had been carried out as recommended and scheduled. Noted from the records that the actual amounts of fertilisers applied in 2020 and 2021, were as per recommendation.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	Periodic tissue and soil sampling were carried out in the Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitor the changes in the organic carbon and total nitrogen. For all estates Agronomic assessment and fertiliser recommendation was conducted by Sime Darby Research Sdn. Bhd. to formulate the FY2023 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling was carried out in September 2022 and soil analysis for T-N, Av-P, Ex-K, Ex-Ca and Ex-Mg was carried at 5-year intervals, latest in 2018.
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	YES	All 3 Estates had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of solid POME. In addition, during replanting, palms were felled, chipped, windrowed and left to decompose.
	7.4.4 Records of fertiliser inputs are maintained.	YES	Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc. Review of the records revealed that the actual fertilizers applied in 2021/2022 was in line with the program.
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	The CU topography/slope/elevation Maps showed that there was no steep terrain in all 3 Estates. The soils Maps showed that there were no fragile soils in all 3 Estates. Peat soils areas shown in previous maps in Tennamaram Estate is now identified as not peat soils, based on the soil analysis report which has been carried out by Sime Darby Research – indicated organic content were below 65% (average 0.81% - 8.54%).
	7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	Auditors has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at SOU Tennamaram.
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	There is no new planting of oil palm on steep terrain.
7.6 Soil surveys and topographic information are used	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	YES	All 3 Estates had management strategies for palm oil cultivation, that considered the soil maps and surveys identifying marginal and fragile soils, including steep terrain for the palm oil long term suitability. The soil maps, updated by Sime Darby Plantation, R&D -Precision Agriculture Unit (NHM) in 2020 were provided and reviewed by the auditors. It was

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Clause	Indicators	Comply Yes/No	Findings
for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	terrain, are taken into account in plans and operations.		observed that no fragile or marginal soils were found in the estates. Hence this indicator does not apply.
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	Auditors verified the Soil Map prepared by R & D - Precision Agriculture Unit (NHM) updated in 2020. There are no marginal and fragile soils on all 3 Estates. Hence this indicator does not apply.
	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 3 Estates, in Tennamaram CU, continued to use Soil surveys and topographic information guide in the planning of drainage and irrigation systems, roads and other infrastructure. Soil & Slope/Elevation Maps prepared by R & D Precision Agriculture Unit (NHM) updated in 2020 are used.
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	There were no peat soils in SOU Tennamaram based on site visits and the new soils map provided by Precision Agriculture Unit (NHM) of Sime Darby Research. It was confirmed through the submission of peat inventory to the RSPO, Tennamaram CU does not have any peat land.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	YES	There were no peat soils in SOU Tennamaram based on site visits and the new soils map provided by Precision Agriculture Unit (NHM) of Sime Darby Research. It was confirmed through the submission of peat inventory to the RSPO, Tennamaram CU does not have any peat land. Hence this indicator does not apply.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	As above.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	
	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	YES	

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Clause	Indicators	Comply Yes/No	Findings
	<p>replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>		
	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	As above.
	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	
7.8 Practices maintain the quality and	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water	YES	All estates had in place and implemented water management plans. Plans for 2022 were sighted. The water management plans were tailored towards how to reduce rainwater collection, to improve user awareness and domestic use.

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Clause	Indicators	Comply Yes/No	Findings												
availability of surface and groundwater.	sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:														
	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. Pesticide in water analysis latest reports were reviewed and no pesticide residue was detected.												
	7.8.1b Workers have adequate access to clean water.	YES	As verified at SOU facilities for workers and through interview with workers, all workers have obtained adequate access to clean water via Air Selangor Berhad.												
	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	SOU Tennamaram 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 agrochemicals 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. The buffer zones established are as follows: <table><tr><td>River width</td><td>Buffer zone</td></tr><tr><td>> 40 meters</td><td>50 meters</td></tr><tr><td>20 - 40 meters</td><td>40 meters</td></tr><tr><td>10 - 20 meters</td><td>20 meters</td></tr><tr><td>5 - 10 meters</td><td>10 meters</td></tr><tr><td>< 5 meters</td><td>5 meters</td></tr></table> The signboards were displayed accordingly at the site where applicable.	River width	Buffer zone	> 40 meters	50 meters	20 - 40 meters	40 meters	10 - 20 meters	20 meters	5 - 10 meters	10 meters	< 5 meters	5 meters
	River width	Buffer zone													
	> 40 meters	50 meters													
20 - 40 meters	40 meters														
10 - 20 meters	20 meters														
5 - 10 meters	10 meters														
< 5 meters	5 meters														
7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	YES	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored and reported thru Online Environmental Reporting.													
7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Mill water use per tonne of FFB is monitored and recorded.													
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	In the mill, fossil fuel Reduction Plan for Financial Year 2021 was established and monitored. Reduce Diesel usage – by monitoring and maintaining the maintenance of the boiler & machineries to ensure at optimum level, to monitor diesel usage, provide training to workers regarding reduce fuel and diesel usage for boiler. As for the estates, high usage of fossil fuel for machineries: <ul style="list-style-type: none">• to carry out scheduled maintenance for machineries to ensure diesel and lubricant usage is at optimal level and in good condition.• to brief workers during muster briefing on how to reduce diesel usage. Example turn off												

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Clause	Indicators	Comply Yes/No	Findings																																																						
			<p>engine when not in used.</p> <ul style="list-style-type: none">• to ensure all equipment for loading and unloading diesel in good condition.• to ensure no spillage and leakage• to ensure nozzle is always locked when not in used to avoid unauthorized diesel filling.																																																						
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	YES	<p>GHG emission has been identified and assessed to all estates and mill through list of waste, EIA, pollution prevention plan, etc. for year 2021 CU calculated the emission through RSPO Palm GHG calculator (data as table below). CU also submitted GHG footprint report to the RSPO and RSPO annual communication of progress (ACOP) (publicly available report) :-</p> <p>SOU Tennamaram has calculate GHG using RSPO Palm GHG calculator</p> <p><u>Summary of Net GHG Emissions</u></p> <table><tr><td>Emissions per Product</td><td>tCO2e/tProduct</td></tr><tr><td>CPO</td><td>0.77</td></tr><tr><td>PK</td><td>0.77</td></tr></table> <table><tr><td>Land Use</td><td>Ha</td></tr><tr><td>OP planted on mineral soil</td><td>15967.39</td></tr><tr><td>OP planted on peat</td><td>0</td></tr><tr><td>Total oil palm planted area</td><td>15967.39</td></tr><tr><td>Conservation (forested)</td><td>0</td></tr><tr><td>Conservation (non-forested)</td><td>61.33</td></tr><tr><td>FFB Production per Hectarage (t/ha)</td><td>19.58</td></tr><tr><td>OER</td><td>19.85</td></tr><tr><td>KER</td><td>5.05</td></tr></table> <p><u>Summary of Field Emissions and Sinks</u></p> <table><tr><td></td><td colspan="2">Own Crop</td><td colspan="2">Group</td></tr><tr><td></td><td>tCO2e</td><td>tCO2e/tFFB</td><td>tCO2e</td><td>tCO2e/tFFB</td></tr><tr><td>Emissions</td><td></td><td></td><td></td><td></td></tr><tr><td>Land Conversion</td><td>95169.11</td><td>0.49</td><td>23281.49</td><td>0.51</td></tr><tr><td>*CO2 Emissions from Fertiliser</td><td>10434.46</td><td>1.03</td><td>3034.92</td><td>0.07</td></tr><tr><td>**N2O Emissions from fertilizer</td><td>6701.91</td><td>0.03</td><td>1966.81</td><td>0.04</td></tr></table>	Emissions per Product	tCO2e/tProduct	CPO	0.77	PK	0.77	Land Use	Ha	OP planted on mineral soil	15967.39	OP planted on peat	0	Total oil palm planted area	15967.39	Conservation (forested)	0	Conservation (non-forested)	61.33	FFB Production per Hectarage (t/ha)	19.58	OER	19.85	KER	5.05		Own Crop		Group			tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB	Emissions					Land Conversion	95169.11	0.49	23281.49	0.51	*CO2 Emissions from Fertiliser	10434.46	1.03	3034.92	0.07	**N2O Emissions from fertilizer	6701.91	0.03	1966.81	0.04
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Clause	Indicators	Comply Yes/No	Findings				
			Fuel Consumption	129.89	0.00	9.71	0.00
			Peat Oxidation	0	0	0	0
			Sinks				
			Crop Sequestration	-88080.64	-0.45	-22067.76	-0.48
			Conservation Sequestration	0	0	0	0
			Total	24354.72	0.13	6225.18	0.14
			Summary of Mill Emissions and Credits				
				tCO2e	tCo2e/tFFB		
			Emissions				
			POME	15406.16	0.06		
			Fuel Consumption	58.66	0.00		
			Grid Electricity Utilisation	0.00	0.00		
			Credits				
			Export of Grid Electricity	0	0		
			Sales of PKS	0	0		
			Sales of EFB	0	0		
			Total	15464.82	0.06		
	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	Auditors has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Tennamaran CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.				
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	The significant pollutants in the operating unit have been identified in the pollution prevention Plan – FY 2022.				
			Environmental issue		Mitigation measures		
			To reduce dark smoke emission		-Quarterly stack sampling has been carried out by external bodies -Carry out routine maintenance Install CCTV link direct to DOE		
			Wastewater discharge through land		-Regularly effluent ditches and its surrounding for leakage.		

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Clause	Indicators	Comply Yes/No	Findings	
				-to conduct clean up all the trap regularly
			Chemical and lubricant spillage	-to ensure used oil and rag in drums are properly stacked and well contained -to clean regularly all the sand and oil trap
			Reduction of greenhouse gas emission	-commissioning of Biogas Plant and run by SDI.
			Diesel spillage	-usage of secondary containment during pump operation.
			Spillage of pesticides & herbicides	-regular inspection on spraying equipments -adhere to SOP
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	Tennamaram CU maintain a strict Zero Burning Replanting Technique practiced in relation to all new plantings, replanting or other development which published in their website http://www.simedarbyplantation.com/sustainability/beliefs-progress/practices-key-initiatives/good-agricultural-practices/zero-burning-replanting-technique . Estates visited had not practiced any open burning and there was no evidence to show that fire had been used for preparing land for replanting. Observed trunk was chipped and stacked at inter row and left decomposed at field.	
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	There is formation of ERP Team & ERP on fire control measures. The organisation chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedure's guidelines were produced by PSQM and amended to tailor to the situation differences in the estates and mills.	
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	The SOU had discussed and engaged with adjacent stakeholders on fire prevention and control measures during stakeholders meeting i.e., July, Aug & Sept 2022.	
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	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	YES	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at SOU Tennamaram since Nov 2005.	
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	The CU has conducted assessment on HCV in June 2014. The report titled 'HCV Re-Assessment For Selangor Central Zone: Strategic Operating Unit SOU 6 Tennamaram and SOU 7 Bukit Kerayong' dated December 2015. Bukit Talang Estate is adjacent with peat swamp forest named Raja Musa Forest Reserve.	
	7.12.2a For existing plantations with an	YES		

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Clause	Indicators	Comply Yes/No	Findings
protected or enhanced.	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.		The estate management has re-assess the HCV status of the water catchments as they have completely dried up in the past few years. The Addendum Report for Tennamaram Estate and Bukit Talang Estate dated 19/11/2019 was made verified. Based on the Addendum Report, the latest status of HCV 4 declared in SOU Tennamaram is 2.81 Ha. Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no new land clearing at SOU Tennamaram since Nov 2005
	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	The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan made available in Tennamaram CU. There is an update of HCV Plan collaboration with Malaysian Nature Society for Socioecological Survey on Otters Project dated in June 2022 detailing plan for Conservation RTE (Otter) and it was reviewed with participation of stakeholders, All the stakeholders have raised some issue and discussed with the management during the meeting via yearly interval. Sighted the latest external stakeholders' minutes meeting and the internal Stakeholder meeting thru social dialogue. The appropriate measures to maintain and/or enhance them were implemented through an action plan. The visited estates have maintained its HCVs.
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained	YES	Based on HCV report titled 'HCV Re-Assessment for Selangor Central Zone: Strategic Operating Unit SOU 6 Tennamaram and SOU 7 Bukit Kerayong' dated December 2015 and addendum Report of HCV dated September 2019 and interviews with villagers' representatives from Kg Attap, Kg Api-Api, Kg Tanjong Siam Baru, Kg Pasir Tuntung, Kg. Raja Musa, Kg Sri Makmur, Kg Hang Tuah, Kg Idaman, Kampung Pecah Batu, Kg Asahan Pasangan, Kg Rantau Panjang and Kg. Assam Jawa. From the interviews, it can be concluded that there were no rights of local communities have been identified in HCV

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Clause	Indicators	Comply Yes/No	Findings
	through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.		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	No RTE species found in the Tennamaram SOU. However, SOU Tennamaram still maintain the plan for HCV area. Although there was no RTE species found in the CU, Sime Darby still established their own disciplinary measures if any of their staff or workers found to capture, harm, collect or kill the RTE species. SOU Tennamaram management will notify the relevant authorities immediately if any individual working for the company is found to capture, harm, collect or kill these species or If found any activities to capture, harm, collect or kill RTE species, the estates will make a report to the Wildlife Department immediately.
	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	Progress of implementation of the action plans 'High Conservation Value (HCV) Management Plan FY2022 for Bukit Talang, Sungei Buloh Estate and Tennamaram Estate' were reviewed and verified on the ground. The SOU has conducted an on-going monitoring of their HCV area 'Monitoring of HCV & Conservation Area'. The monitoring results had been fed back into current action plan. 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. Both estates have cooperated with Selangor Forestry Department, Global Environment Consultant and Department of Environment on a rehabilitation project of encroachment area in the Raja Musa Forest Reserve which neighbouring with the SOU Tennamaram. there is also an update of HCV Plan collaboration with Malaysian Nature Society for Socioecological Survey on Otters Project detailing plan for Conservation RTE (Otter) at Sungei Buloh Estate.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	YES	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no new land clearing in existing plantations or new plantings at SOU Tennamaram since Nov 2005.

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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>	(a)	<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>	Yes	<p>Sime Darby Plantation (SDP) membership is before 2018 and time bound plan maximum up to 30th June 2023. As at January 2022, no deviation of TBP and approval by RSPO Secretariat are not required. SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Currently, only Indonesia operation yet to be certified.</p> <p><u>Indonesia Operations – as of January 2022</u></p> <p>PT Bahari Gembira Ria Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR. Refer to RSPO Certificate & Report for PT BGR - https://rspo.secure.force.com/membership/servlet/servlet.FileDownload?retURL=%2Fmembership%2Fapex%2FRSPOCertSearch&file=00P90000010ioYJEAZ</p> <p>PT Sandika Natapalma Only Karya Palma Estate yet to be certified - Pending confirmation from Badan Pertanahan National (BPN) on Hak Guna Usaha (HGU) Document.</p> <p>PT Budidaya Agro Lestari Only Beturus (PT BAL) Estate yet to be certified – HGU obtained as per May 2018. However never been released by BPN.</p> <p>PT Guthrie Pecconina Sg Jernih Estate and KKPA was separated in 2022 and recorded separately. 890.98 Ha – still under Land legalisation process and process Kadastral.</p> <p>PT Sime Indo Agro Only East Estate/Sei Mawang Estate yet to be certified – Land legalisation process for East Estate for 5,815.64 ha is still in process.</p> <p>PT Bina Sains Cemerlang Sungai Pinang Estate & Bukit Pinang Estate yet to be certified – Land legalisation process for 308.35 ha is still in process.</p> <p><u>Liberia Operations – as of January 2020</u> As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby</p>

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

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

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		by the audit team based on self-declarations only by the company,		<p>compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.</p> <p>No critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.</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"> 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; 		
		<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 		
		<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 		
		<ul style="list-style-type: none"> If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the reqs. 		
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.		

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	(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 2.2.1 of this checklist, the Land Title for all Estate has been verified, for all estates. The Land Title was under the name of Sime Darby Plantation Bhd. Each estate had legal use of the land through Lands and Surveys Department following the payment of premium and Land fee. Based on this, it has been confirmed that there was no such case concerning the rights of local communities or indigenous people in the SOU.</p>

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ATTACHMENT 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN-sampai sini

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
3.7.2 DA 01 2022	Minor	<p>Finding: Records of training related to Employment Act 1955 for contractor was not fully maintained.</p> <p>Objective evidence: From interview session with owner of FFB Contractors from Ketara Tagas Sdn. Bhd., supported with document reviews (i.e. payslip Jan. 2022 to Sep. 2022, contract agreement, SOCSO/EPF contribution (Form 8A/Form A), FFB Lorry (BHM 8837 & BGV 8837) Weighbridge Ticket July 2022 to September 2022, etc) and grievance taken from 2 FFB Drivers, found that the FFB Contractor is lack of awareness on Employment Act 1955 such as not implementing collective agreements, discrepancies of data in documentation of pay and condition, payment received not as per employment contracts and payslip is given to the workers upon request</p>	<p>Root cause: Training on Employment Act 1955 to contractor's workers is insufficient i.e., not implementing collective agreements, discrepancies of data in documentation of pay and condition, thus lacking information on details in employment contract and pay slip. Series of training on legal compliance was given to the contractor however the information were not cascaded down to their workers.</p> <p>Corrective Action: The Estate management and RSQM has carried out Refresher Training on Employment Act 1955 requirement to all contractor's workers on 14/11/2022 at Meeting Room Ladang Bukit Talang. From the evaluation form submitted by the workers, they have understood and acknowledged on their right and responsibilities as per the Employment Act 1955. Continuous monitoring on contractor's legal compliance on monthly basis and engage with contractor's workers on annually during internal audit.</p>	<p>Sighted the evidence that the Estate management and RSQM has carried out Refresher Training on Employment Act 1955 requirement to all contractor's workers on 14/11/2022 at Meeting Room Ladang Bukit Talang.</p> <p>Corrective action plan accepted the effectiveness of implementation will be verified during next audit</p> <p>Status: OPEN</p>
4.2.1 DA 02 2022	Major	<p>Finding: The mutually agreed system which open to all affected parties on resolves disputes in an effective, timely and appropriate manner, is not effectively implemented to contractors' workers.</p>	<p>Root cause: The briefing on RSPO Policy was carried to the contractor however the information was not cascaded down to their employee.</p>	<p>Sighted the evidence training record conducted by Estate management and RSQM carried out Refresher Training to all contractor employee on Grievance Channel Sime Darby and sighted and evidence Provide</p>

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		<p>Objective evidence: Interview session with contractor workers from Ketara Tegas Sdn. Bhd. found grievances from 2 FFB Driver related to contractor management on documentation of pay and condition, employment contracts and related documents (i.e detailing payment, payroll documents, providing accurate information on compensation for all work performed). In addition, the grievance system such as workers helpline, suara Kami, whistle blowing not fully understood by sampled contractor workers.</p>	<p>Corrective Action: The Estate management and RSQM carried out Refresher Training to all contractor employee on Grievance Channel Sime Darby and, Provide Grievance Sticker stick on their lorry's requirement on 14/11/2022 at Meeting Room Ladang Bukit Talang.</p> <p>Provide grievance channel sticker and stick on their lorry's dashboard. The workers acknowledge how to channel their grievance through proper channel provided by Company Sime Darby Plantation Berhad</p>	<p>Grievance Sticker stick on their lorry's requirement on 14/11/2022 at Meeting Room Ladang Bukit Talang.</p> <p>Status: closed</p>
3.6.2 RAR 01 2022	Major	<p>Finding: H&S plan to monitored on risk and result of audiometric test was not available</p> <p>Objective evidence: At TPOM Audiometric test has been carried out on 06/12/2021 and reported on 28/02/2022 by Alam Hijau Integrasi (M) Sdn Bhd, by OHD Dr Kaviyaran (OHD no.HQ/08/DOC/00/491) for 53 workers. Result from assessment 1 employee was found to have STS. Recommendation made by OHD need to conduct retest on 06/03/2022 was not available.</p>	<p>Root cause: Recommendation made by OHD report dated 28/2/2022 is not available during assessment day</p> <p>Corrective Action: TPOM already made an appointment with OHD for 1 employee as per recommendation by OHD dated Nov 2022</p> <p>SHO will be appointed to monitor all the safety & health issues</p> <p>The TPOM Management / person in charge will monitor and take action as per recommendation.</p>	<p>Sighted an evidence of retest has been carried out BY OHD Alam Hijau Integrasi (M) Sdn Bhd, by OHD Dr Kaviyaran (OHD no.HQ/08/DOC/00/491) on November 2022. Results from assessment were indicated workers were fit to work in that areas</p> <p>Status closed.</p>
3.8.11 RAR 02 2022	Major	<p>Finding: TPOM mill not inform 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</p> <p>Objective evidence:</p>	<p>Root cause: TPOM management did not inform the certification body this as, there was no dedicated person identified to monitor this activity and manage it appropriately.</p>	<p>Sighted an evidence of email has been submitted to CB on November 2022 related to new ad hoc transporter contractor</p> <p>And also sighted appointment letter has been made to AM and clerk for PIC to monitored on SCCS and new</p>

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		There was 1 new appointed adhoc contractors for transportation Crude Palm Oil "Teo Tuan Kwee sdn Bhd, appointed on 18/10/2021 – 31/12/2021, and new adhoc contract on 27/07/2022 – 31/10/2022. However, TPOM not inform CB in advance of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Corrective Action: TPOM immediately inform certification body dated November 2022 for adhoc transporter. TPOM person incharge will monitor on the issue and if there is adhoc transporter / contractor transport certified CSPO and CSPK will inform certification body.	adhoc contractor Status: closed
7.3.2 RMN 01 2022	Minor	<p>Finding: The waste disposal method was not in line with waste management plan.</p> <p>Objective evidence: Sighted during assessment at below estates: 1.Sungei Buloh Estate a. On 5th Schedule; inventory of scheduled waste SW 409 was found not accurate and up to date. b. Domestic waste was found left unattended at line site. 2.Tennamaram POM a. On 5th Schedule; inventory of scheduled waste SW 306 was found not accurate and up to date.</p>	<p>Root cause: Training for SW inventory especially on eswiss system and overall waste management was not conducted. There was also lack of monitoring of relevant activities related to waste management.</p> <p>Corrective action: Management will conduct appropriate training into the annual training programme. To ensure personnel understood the procedure requirement and improve the monitoring of these activities.</p>	<p>Corrective action plan accepted the effectiveness of implementation will be verified during next audit</p> <p>Status: OPEN</p>

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ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor & status
3.8.6 (Supply Chain) MZK 01 2021	Major	<p>Finding : Internal Audit and Management review was not conduct annually</p> <p>Objective evidence : Sighted Internal Audit and Management Review SCCS for Tennamaram POM was not conduct annually with evidence last conduct on 18/8/20 and Management review on 12/11/20.</p>	<p>RSPO internal audit was conducted on 08/08/2022 by Nor Aatikah Bt Mohd hassan (lead auditor), Shylaja Devi Vasudevan Vair, Raanon Gandon, Muhammad Hafiz Zulkifli, and Wafa Abdul Aziz. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 1 NCR were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.</p> <p>Documented procedure has defined management review will be conducted once a year Management review meeting has been conducted on dated 30/092022 (combine RSPO, RSPO SCCS and MSPO)</p> <ul style="list-style-type: none"> • Internal audit – 1 NCR (SCCS only) • Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result achieved. • Previous meeting – was highlighted • Changes – There is no significant changes. • Recommendation for improvement – improve the established system <p>Thus, previous NCR was satisfactory closed</p>
3.4.3 MAR 01 2021	Major	<p>Finding : Social monitoring plans not reviewed and updated in a participatory way.</p> <p>Objective evidence : Based on interview with employee and union representative from Tennamaram POM and documentation review such as checkroll and punch card records, it was found that 2 employee work more than 5 consecutive hours without rest at least 30 minutes on 7, 19 and 20 Aug 2021.</p> <p>The employee also, on 7 Aug 2021, after finished his overtime from 5.08 pm until 8.21 am on 8 Aug, continue his work on 8 Aug 2021 until half day. On 19 Aug 2021, the employee start overtime from 4.15 pm until 7.39 am on 20 Aug 2021 and</p>	<p>The social management action plans are being reviewed and updated on an annual basis at Tennamaram CU. This takes into account inputs from external stakeholder meetings, Social Dialog, NUPW meetings, OSH Committee meetings, as well as Women & Children Committee meetings. The SIA review process had included stakeholders' consultation with regards to social issues. Sighted the latest external stakeholders' minutes meeting for whole SOU 6 Tennamaram was conducted independently. For Sg. Buloh Estate was conducted on 28/07/2022, for Bukit Talang was conducted on 27/07/2022, for Tennamaram POM was conducted on 14/09/2022 and Tennamaram Estate was conducted on 18/08/2022. The consultation was carried out to external and internal stakeholders i.e. government agencies, school, villagers, suppliers and private sectors (contractors and neighboring estates). Evidence of the above stakeholder consultation conducted are available and the stakeholder feedback were recorded in the SIA action plan. The social management action plan for Tennamaram POM was updated on</p>

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		<p>continue his work on 20 Aug 2021 from 7.39 am until 4.00 pm.</p> <p>The overtime issue not being assessed in the social monitoring plans for the year 2021, even the employee or union representative addressed the issue to the management.</p>	<p>30/09/2022. The previous issues highlighted by employee/union representative regarding working hours and overtime have been addressed accordingly. The execution such as shift time changes over to reduce working hours maximum 12 hours only for processing workers i.e., 1st shift: 8am – 6pm & 2nd shift: 6pm – 6am and guided by new inter office mail (Ref No : CEOUM/076/12/2021) stated no mill workers allowed to work more than 12 hours unless certain condition permitted by law as stated was satisfactory being implemented. This implementation was verified by interview session with workers representative and verification of employee checkroll system and punch card records.</p> <p>As a result, previous Major NCR was satisfactory closed</p>
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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		

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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		

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

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	Jubilee	Oil Mill					SOU18(Diamond Jubilee) is now part of SOU 17(Kempas). Welch Estate, previously from SOU 19(Pagoh) is now part of SOU 18(Diamond Jubilee)
		Diamond Jubilee Estate	-		Certified		
		Bukit Asahan Estate	-		Certified		
		Welch Estate	-		Certified		
19	Pagoh	Pagoh Oil Mill	-	Muar, Johor	Certified	28-Jan-14	
		Pagoh Estate	-		Certified		
		Lanadron Estate	-		Certified		
		Pengkalan Bukit Estate	-		Certified		
20	Chaah	Chaah Oil Mill	-	Chaah, Johor	Certified	18-Nov-10	
		Chaah Estate	-		Certified		
		Sg. Simpang Kiri Estate	-		Certified		
		North Labis Estate	-		Certified		
21	Gunung Mas	Gunung Mas Oil Mill	-	Kluang, Johor	Certified	19-May-10	* SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bk Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018.
		Gunung Mas Estate	-		Certified		
		Kempas Klebang Estate	-		Certified		
		Bukit Paloh Estate	-		Certified		
		Yong Peng Estate	-		Certified		
22	Bukit Benut	Bukit Benut Oil Mill	-	Kluang, Johor	Certified	5-Oct-11	* SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO. Certification Scope of SOU Bk Benut in 2018.
		Bukit Benut Estate	-		Certified		
		Lambak Elaeis Estate	-		Certified		
		CEP Nyior Estate	-		Certified		
23	Ulu Remis	Ulu Remis Oil Mill	-	Layang-layang, Johor	Certified	11-Apr-11	
		Ulu Remis Estate	-		Certified		
		Cenas Estate	-		Certified		
		Bukit Badak Estate	-		Certified		
		Tun Dr. Ismail Estate	-		Certified		
		Pekan Estate	-		Certified		
		Sembrong Estate	-		Certified		
24	Hadapan	Hadapan Oil Mill	-	Layang-layang,	Certified	29-Mar-11	

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		Sri Pulau Estate	-	Johor	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		
		Kelida Estate	-		Certified		
		Lavang (Special) Estate	-		Certified		

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		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.

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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 Division 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		

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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 Kemasan 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		

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		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		

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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-		

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						Certified		
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)				
		Smallholders – MBE East Zone (37)				
2	Milne Bay Estates (MBE)	Hagita Oil Mill	NA	Milne Bay Province, Papua New Guinea	Certified	15-Feb-13
		Giligili Estate				
		Hagita Estate				
		Waigani Estate				
		Sagarai Estate				

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		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)				

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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				

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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	

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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). http://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations
		Bomi Estate					
		Lofa Estate					
		Matambo Estate					
		Grand Cape Mount Estate					