



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

RSPO PUBLIC SUMMARY REPORT

File Ref. :

ES10170005

CLIENT : SIME DARBY PLANTATION BERHAD – SOU 17 KEMPAS

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 multi site certification, list additional sites in attachments) :

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
KEMPAS Strategic Operating Unit (SOU 17)	Kempas Oil Mill	N 2.3211	E 102.4269	77000, Jasin, Melaka
	Kempas Estate	N 2.2770	E 102.4652	71000, Jasin, Melaka
	Kemuning Estate	N 2.4643	E 102.3380	76460, Tebong, Melaka
	Tangkah Estate	N 2.3435	E 102.6375	84900, Tangkak, Johor
	Serkam Estate	N 2.3060	E 102.4610	71000, Jasin, Melaka

MAP : See Attachment 1

AUDIT DATE : 20 – 22 & 24 March 2023

DURATION : 24 auditor days

TYPE OF AUDIT :



Annual Surveillance Audit No. 3



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 : 20/5/2020 – 19/5/2025

The following attachments form part of this report:

Non-conformity Report(s)



List of additional site(s)



Report by Audit Team Leader

Acknowledgement by Client's Representative

Name : **AMIR BIN BAHARI**

Name : Shylaja Devi Vasudevan Nair

Signature :

Signature :

Date : **9/05/2023**

Date : 26/5/2023

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SUMMARY OF AUDITS

Recertification Audit 2				
On-site audit date	:	10 - 14 February 2020		No. of auditor days : 25 Auditor Days
Audit team	:	Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar bin Kamaruzaman, Rozaimee bin Ab Rahman, Rahayu binti Zulkifli, Mohd Norddin bin Abd Jalil.		
No. of major NCR	:	3	Indicator: 4.1.1, 4.2.1, 3.6.2	Closing date : 4/5/2020
No. of minor NCR	:	5	Indicator: 1.1.5, 2.1.3, 3.5.1, 6.5.4, 6.7.2	
Indicate the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities
		√	N/A	√
		Contract workers	NGOs	Govt. agency
		√		Independent growers
		Indigenous people	Contractor	Others (Please specify)
		N/A	√	
Supply base sampled	:	Kempas Estate, Kemuning Estate, Tangkah Estate and Serkam Estate		
Justification of audit planning		Total allocation of auditor days for Kempas CU were: Mill = 5 days (1 day for social, 1 day for supply chain certification systems and 2 days for safety and health, environment, mill best practices, GHG verification, TBP, Partial Certification). Kempas, Kemuning, Tangkah & Serkam Estate = 5 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification plus the verification of Land History and Land Title.		
Changes since the last audit	:	1) In ASA4, Serkam Division was excluded from Kempas CU. However, it was included back into the supply base of Kempas CU during this recertification audit. 2) Kempas CU has applied to change their supply chain model from MB to IP. The application has been submitted in June 2019 and approved by RSPO EB. It has been noted that during this reporting period, Kempas CU was receiving the outside crop until May 2019.		
Report approved by		Kamini Sooriamoorthy		Date: 29/05/2020

Annual Surveillance Audit 1					
On-site audit date	:	26-29 April 2021 (16.0 a.d)		No. of auditor days :	22 Auditor Days
Remote audit date	:	22-24 February 2021 (6.0 a.d)			
Audit team	:	Rozaimee Ab Rahman (LA), Mohd Ab Raouf Asis, Mohd Nordin Abdul Jalil, Ismail Adnan, Amir Bahari, Mohd Zulfakar Kamaruzaman (LA remote), Dzulfikar Azmi (remote)			
No. of major NCR	:	NA	Indicator: NA		Closing date : NA
No. of minor NCR	:	2	Indicator: 3.3.2, 3.7.2		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
		√		√	
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
		√		√	
		Indigenous people	Contractor	Others (Please specify)	
		NA	√		
Supply base sampled	:	Kempas Estate, Kemuning Estate, Tangkah Estate and Serkam Estate, Kempas POM			
Changes since the last audit	:	No changes			
Justification of audit planning	:	Total allocation of auditor days for Kempas CU (onsite) were: Mill = 4.0 days (1 day for social, 1 day for supply chain certification systems and 2 days for safety and health, environment, mill best practices, GHG verification, TBP, Partial Certification). Kempas, Kemuning, Tangkah & Serkam Estate = 3 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification plus the verification of Land History and Land Title.			
Report approved by	:	Kamini Sooriamoorthy		Approval date : 19/05/2021	

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Annual Surveillance Audit 2				
On-site audit date	:	14-18 March 2022	No. of auditor days	: 18
Audit team	:	Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar bin Kamaruzaman, Dzulfikar bin Azmi, Selvasingam T. Kandiah, Amir bin Bahari		
No. of major NCR	:	2	Indicator: 3.8.5, 3.8.6 (SC)	Closing date: 16/6/2022
No. of minor NCR	:	Nil	Indicator : N/A	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities
	:	√		√
	:	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
	:	√		
	:	Indigenous people	Contractor	Others (Please specify)
	:		√	
Supply base sampled	:	Kempas Estate, Serkam Estate, Tangkah Estate, Kemuning Estate		
Changes since the last audit	:	No changes		
Justification of audit planning	:	Total allocation of auditor days for Kempas CU (onsite) were: Mill = 4.0 days (1 day for social, 1 day for supply chain certification systems and 2 days for safety and health, environment, mill best practices, GHG verification, TBP, Partial Certification). Kempas, Kemuning, Tangkah & Serkam Estate = 3.5 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification plus the verification of Land History and Land Title.		
Name of peer reviewer	:	NA		
Report approved by	:	Kamini Sooriamorthy		Approval date : 21/6/2022

Annual Surveillance Audit 3				
On-site audit date	:	20-22 & 24 Mac 2023	No. of auditor days	: 24
Audit team	:	Amir B Bahari (LA) / Mohd Ab Raouf bin Asis / Mohd Zulfakar bin Kamaruzaman, Dzulfikar bin Azmi / Selvasingam T. Kandiah / Rozaimee Abd Rahman		
No. of major NCR	:	Nil		Closing date: -
No. of minor NCR	:	1 - Indicator 3.3.2		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities
	:	√		√
	:	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
	:	√		
	:	Indigenous people	Contractor	Others (Please specify)
	:	NA	√	
Supply base sampled	:	Kempas Estate, Serkam Estate, Tangkah Estate, Kemuning Estate		
Changes since the last audit	:	No changes		
Justification of audit planning	:	Total allocation of auditor days for Kempas CU (onsite) were: Mill = 4.0 days (1 day for social, 1 day for supply chain certification systems and 2 days for safety and health, environment, mill best practices, GHG verification, TBP, Partial Certification). Kempas, Kemuning, Tangkah & Serkam Estate = 5 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification plus the verification of Land History and Land Title. The allocation for the MSPO audit days is also being incorporated in the justification of the total MD in entirety.		
Name of peer reviewer	:	NA		
Report approved by	:	Kamini Sooriamorthy		Approval date : 9/5/2023

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SUMMARY OF INFORMATION

TABLE 1

	RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Mac 2020 – April 2021	May 2021- April 2022	Mac 2022 – Feb 2023	March 2023 - Feb 2024	
Certified FFB Processed (MT)	238,205.46	231,102.16	210,165.03	****160,952.80	
Production of Certified CPO (MT)	59,818.48	49,865.00	45,752.92	33,381.61	
Production of Certified PK (MT)	15,302.40	12,379.00	11,278.63	8,289.07	
Certified Areas (Ha)	*12,031.81	**11,828.51	11,828.51	11,828.51	
Planted Areas (Ha)	*11,268.75	10,918.96	10,918.96	10,918.96	
Production Areas (Ha)	10,151.12	9,396.69	9,425.26	9,481.11	
HCV Areas / Conservation Areas Ha	47.79	***48.69	48.69	48.69	
REMARKS	<p>Recertification audit – 2020 *Changes in Certified & Planted area includes the following: → Addition of Serkam Estate into Kempas CU. → Inaccuracy in Kemuning Estate reported figure. Previously, they reported the amount of hectareage of the quit rent instead of the land title. → Land acquisition by the government to build Rumah Mampu Milik at Kempas Estate.</p> <p>ASA 1 – 2021 **Updates on reduction of Certified area as follows: → Kempas: Land sold to Third Party, Armada Warak Sdn Bhd in March 2020. → Tangkah, Serkam, & Kemuning: Reduction of area due to the revision on Internal SAP System for planted hectares. ***HCV areas including the one in Serkam Estate.</p> <p>ASA 2 – 2022 As this SA was carried out in March 2022, the reporting period covered in this audit was between May 2021 and Feb 2022.</p> <p>ASA 3 – 2023 ****Lesser crop projection reflecting the current FFB production values.</p>				

TABLE 2

	PO	PK
**Last years certified volume (MT)	45,752.92	11,278.63
Last years actual certified sold (MT)	12,821.90	4,953.12
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	8,116.56	0.00
Last year actual sold CSPO credits (where applicable)	0.00	0.00
New year certified volume (MT)	33,381.61	8,289.07

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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 recognized 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
Amir bin Bahari	Lead Auditor, Safety, Environment	Holds a B.Sc. in Chemistry from Universiti Sains Malaysia. He has over 35 years working experience in the oil palm plantation operation. He is qualified lead auditor for RSPO P&C.
Mohd Zulfakar bin Kamaruzaman	Auditor, Social (External), HCV	Holds a B.Sc. Forestry. He had several years of working experience in oil palm operation. He is a qualified RSPO P&C and RSPO Supply Chain Lead Auditor.
Dzulfiqar bin 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 RSPO Lead Auditor since Oct. 2020.
Selvasingam T. Kandiah	Auditor, GAP	Holds a B.Sc. (Hons) of Agriculture University of Agricultural Sciences, Hebbal, Bangalore, India. He had more than 29 years of working experience in plantation management covering cocoa, rubber and oil palm. He is a qualified RSPO P & C and MSOP Lead Auditor.
Mohd Ab Raouf bin Asis	Auditor, Social (Internal), Supply Chain	Obtained qualification in B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM in 2007. He has been in the plantation industry for 7 years assisting Estate Manager managing palm oil estates. He has been trained and qualified as RSPO as well as MSPO Lead Auditor.
Rozaimiee Ab. Rahman	Auditor Environment, Occupational health, and safety	Holds a B. Sc. Of Agriculture. He had several years of working experience in the oil palm operation. He is a qualified auditor for RSPO P&C.

1.3 Audit methodology

The audit covered the Kempas palm oil mill and all four (4) of its supply bases. The supply bases are Kempas Estate, Kemuning Estate, Tangkah Estate and Serkam Estate. The audit included an on-site audit to the estates, mill, line site, local communities, contractors and suppliers to verify the implementation of the requirement of the RSPO certification system. 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"> a) All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in origin language as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer. b) They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime. c) They have been getting salaries above RM1,500 since May 2022. Salaries were paid before the 7th of every month. d) No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment. e) No discrimination between migrant workers and local workers, between male and female worker. f) Comfortable housing with water and electricity provided by government (Subsidized Electricity). g) OPP System implemented as mechanism to repair house defect. h) Have access to affordable food from the canteen/sundry shops within the estates/mill premises. i) Entitled to free medical facilities at the estates clinic. j) 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. k) They knew the types of work offered at Kempas CU (mill & estates) when they were in their countries of origin.

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	<p>l) All migrant workers keep their own passports.</p> <p>m) Shuttle services FOC once a month for workers go to nearest town.</p> <p>n) Monthly recognition for workers i.e., highest harvesting productivity and housing cleanness</p> <p>o) Alternate Sunday/Rest Work</p> <p>p) Complaint channel via various platform i.e., Suara Kami (Platform platform operated by Elevate), Workers Hepline, WMU Careline (From Region), Whistleblowing (HQ).</p> <p>q) 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</p>	
2) Settlers	Not applicable	
3) Villagers / Local communities (including women representatives, displaced communities)	<p>The audit team has also interviewed relevant stakeholders such as:</p> <p>a) Majlis Pengurusan Komuniti Kampung Merlimau Utara,</p> <p>b) Kampung Lembah Kesang, Kampung Terentang, Kampung Chin Chin Hulu, Tok Sidang Seri Mendapat,</p> <p>c) Kempas Estate and POM - Majlis Pengurusan Komuniti Kampung Tebong (Kemuning), Kuala Sungga Tebong, JPKK Kuala Sungga, Kampung Tebong, JPKK Kampung Rembia, JPKK Kemuning, JPKK Gadek Dalam, Kampung Orang Asli Bukit Putus</p> <p>d) Kemuning - Kampung Telok Rimba, Kampung Parit 2</p> <p>e) Tangkah - JKKK Kelubi,</p> <p>f) Serkam Estate - Kampung Serkam Darat, Kampung Berengan Enam</p>	
4) Suppliers	<p>Interviews made with the following vendors / contractors among others;</p> <p>a) (Kempas POM), Ganesan Machinery Enterprise, Rajandran Setia Sdn Bhd, Norlidah & Zam Enterprise</p> <p>b) (Kempas Estate), Kim Soon Lee Transport Sdn Bhd</p> <p>c) (Serkam Estate), Hup Hei Tractor Works Sdn Bhd, Syarikat Syuhadah, Kim Soon Lee Transport Sdn Bhd</p> <p>d) (Kemuning Estate) EBM Marketing & Services, Barathan Enterprise</p> <p>e) (Tangkah Estate) Kim Soon Lee Transport Sdn Bhd</p>	
5) Contract workers (local / foreign / Orang Asli workers / male & female)	Interviews with local contractors workers from and documents reviewed, confirmed 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. All workers been paid by pieced rated wages. Workers are provided with comfortable housing with free water and electricity at the estates. No abuse at work and force labour occurred for contractor workers. Salary paid via banking system with payslip provided along with detailing as payslip. The workers have been paid complied with Minimum Wages Order 2022.	
6) Local & national NGOs	Local and national NGOs (including WWF) listed in the Estates Stakeholders' lists were contacted by SIRIM QAS Int Sdn Bhd for comments. However, no comments were received. Nevertheless,	

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	document review confirmed no grievances and user rights issues.
7) Government agencies / Statutory bodies	Government agencies/statutory bodies such as Johor Forestry Department, Johor State Park Authority and Johor Wildlife Department, listed in the Estates Stakeholders' lists was contacted by SIRIM QAS Int Sdn Bhd for comments. However, no comments were received. Nevertheless, document review confirmed no grievances and user rights issues.
8) Independent growers / Smallholders	Not applicable
9) Indigenous people	Apen Anak Siang Sin – Kg Asli Bukit Putus. Kampung Orang Asli Bukit Putus, within 15km Radius. No direct impact from the estate operation since the Kg Orang Asli is nearer to another CU, as confirmed through the interview with the Tok Batin i.e., Apen Anak Siang Sin. However, it was still included in the Stakeholder List.
10) Contractor	Interview with representative from a) Yaw Trading (Grass cutting), b) Kim Soon Lee Transport Sdn. Bhd. (Transporter for Transportation of FFB), c) Barathan Enterprise (Grasscutting & Hired JCB Contractor), d) Sri Yogaletchumi Kali Enterprise (Hired JCB Contractor), e) Rajandran Setia Sdn. Bhd. (Transporter for the Transportation of FFB)
11) Previous land owner (if any)	Not applicable
12) Others (please specify)	Not applicable

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1.5 Audit plan : Refer to Attachment 2

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

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Kempas Certification Unit (Kempas CU) is one of the Strategic Operating Unit (SOU) of Sime Darby Plantation Berhad. The CU is also known as SOU 17 and was initially certified to the RSPO P&C by SIRIM QAS International Sdn Bhd in 2015. The Kempas CU comprises of the Kempas Palm Oil Mill (Kempas POM) and four (4) supply base i.e. Kempas Estate, Kemuning Estate, Tangkah Estate and Serkam Estate. All the estates are owned by SDPB. The Kempas POM has a mill capacity of 60 mt/hr. All the estates have been fully developed before 2005, hence Principle 7 of the RSPO P&C is therefore not applicable.

Kempas CU has applied to change their supply chain model from MB to IP in June 2019 and approved by RSPO EB, hence starting from June 2019 onwards, only 100% certified crop received and processed.

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

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

**Table 1: Actual FFB production by the supply base for the last reporting period
(May 2022 – Feb 2023)**

Estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Bukit Asahan	899.06	0.80	BSI
Diamond Jubilee	1214.29	1.08	BSI
Kempas	52171.27	46.25	SIRIM
Kemuning	22098.70	19.59	SIRIM
Lanadron	591.19	0.52	BSI
Pagoh	653.04	0.58	BSI
Pengkalan Bukit	743.19	0.66	BSI
Serkam	16293.03	14.44	SIRM
Tangkah	17966.42	15.93	SIRIM
Welch	181.98	0.16	BSI
Total	112,812.17	100.00	-

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**Table 2: Projected FFB production by supply base for the next reporting period
(March 2023 – Feb 2024)**

CU own estates	FFB Contribution	
	Tonnes	Percentage (%)
Kempas	64,108.34	39.83%
Tangkah	28,934.90	17.98%
Kemuning	37,351.00	23.21%
Serkam	30,558.56	18.99%
Grand Total	160,952.80	100

**Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period
(May 2022 – Feb 2023)**

	Total (MT)
FFB Received	112,809.757
FFB Processed	112,809.757
CPO Production	22,824.157
PK Production	5,876.182
CPO delivered as IP	12,821.900
CPO delivered as non-RSPO certified	8,116.560
PK delivered as IP	4,953.120
PK delivered as non-RSPO certified	0
Product sold under Book & Claim	0

**Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period
(March 2023 -Feb 2024)**

	Total (MT)
FFB Received	*160,952.80
FFB Processed	*160,952.80
CPO Production	33,381.61
PK Production	8,289.07

*Lesser crop projection reflecting the current FFB production values.

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Kempas	4,368.22	4505.45
Kemuning	2368.66	2671.05
Tangkah	2,360.19	2537.78
Serkam	1,821.89	2,114.23
Total	10,918.96	11,828.51

Table 6 Planting profile for Kempas Estate

Estate	Year of planting	Planting Cycle	Mature >3 years (Ha)	Immature < 3 years (Ha)	Planted area	% of planted area mature	% of planted area immature
Kempas	1991	1st	15.38	0	15.38	0.35%	0
Kempas	1992A3	1st	33.79	0	33.79	0.77%	0
Kempas	1992A4	1st	13.62	0	13.62	0.31%	0
Kempas	1993A	1st	68.03	0	68.03	1.56%	0
Kempas	1993C	1st	27.82	0	27.82	0.64%	0

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Kempas	1994	1st	60.09	0	60.09	1.38%	0
Kempas	1994A1	1st	56.48	0	56.48	1.29%	0
Kempas	1994A2	1st	58.95	0	58.95	1.35%	0
Kempas	1994A3	1st	47.08	0	47.08	1.08%	0
Kempas	1994B	1st	23.68	0	23.68	0.54%	0
Kempas	1994B1	1st	70.38	0	70.38	1.61%	0
Kempas	1994B2	1st	68.78	0	68.78	1.57%	0
Kempas	1994B4	1st	10.46	0	10.46	0.24%	0
Kempas	1994D	1st	48.18	0	48.18	1.10%	0
Kempas	1994E	1st	70.94	0	70.94	1.62%	0
Kempas	1994F	1st	52.83	0	52.83	1.21%	0
Kempas	1995A	1st	55.26	0	55.26	1.27%	0
Kempas	1995B	1st	95.60	0	95.60	2.19%	0
Kempas	1995B1	1st	69.28	0	69.28	1.59%	0
Kempas	1995B2	1st	78.72	0	78.72	1.80%	0
Kempas	1995B3	1st	81.59	0	81.59	1.87%	0
Kempas	1995C	1st	68.50	0	68.50	1.57%	0
Kempas	1995C1	1st	65.70	0	65.70	1.50%	0
Kempas	1995C2	1st	57.07	0	57.07	1.31%	0
Kempas	1995D	1st	51.30	0	51.30	1.17%	0
Kempas	1998	1st	74.65	0	74.65	1.71%	0
Kempas	2000	2nd	63.69	0	63.69	1.46%	0
Kempas	2000A	2nd	23.08	0	23.08	0.53%	0
Kempas	2000B	2nd	47.85	0	47.85	1.10%	0
Kempas	2000C	2nd	34.81	0	34.81	0.80%	0
Kempas	2000E	2nd	81.67	0	81.67	1.87%	0
Kempas	2001	2nd	44.47	0	44.47	1.02%	0
Kempas	2003	2nd	40.18	0	40.18	0.92%	0
Kempas	2005	2nd	8.00	0	8.00	0.18%	0
Kempas	2006	2nd	6.88	0	6.88	0.16%	0
Kempas	2009B	2nd	57.09	0	57.09	1.31%	0
Kempas	2011A	2nd	15.08	0	15.08	0.35%	0
Kempas	2011B	2nd	91.40	0	91.40	2.09%	0
Kempas	2011C	2nd	92.88	0	92.88	2.13%	0
Kempas	2013A	2nd	63.57	0	63.57	1.46%	0
Kempas	2013B	2nd	95.20	0	95.20	2.18%	0
Kempas	2014A	2nd	61.38	0	61.38	1.41%	0
Kempas	2014B	2nd	74.64	0	74.64	1.71%	0
Kempas	2014C	2nd	36.19	0	36.19	0.83%	0
Kempas	2014D	2nd	58.90	0	58.90	1.35%	0
Kempas	2016A	2nd	89.59	0	89.59	2.05%	0
Kempas	2016B	2nd	77.23	0	77.23	1.77%	0
Kempas	2016C	2nd	82.13	0	82.13	1.88%	0
Kempas	2016D	2nd	63.51	0	63.51	1.45%	0
Kempas	2017A	3rd	76.52	0	76.52	1.75%	0
Kempas	2017B	3rd	99.53	0	99.53	2.28%	0
Kempas	2017C	3rd	64.88	0	64.88	1.49%	0
Kempas	2017D	3rd	81.26	0	81.26	1.86%	0
Kempas	2018A	3rd	66.49	0	66.49	1.52%	0
Kempas	2018B	3rd	76.82	0	76.82	1.76%	0
Kempas	2018C	3rd	80.80	0	80.80	1.85%	0
Kempas	2018D	3rd	76.83	0	76.83	1.76%	0
Kempas	2019A	3rd	62.73	0	62.73	1.44%	0
Kempas	2019B	3rd	74.08	0	74.08	1.70%	0
Kempas	2019C	3rd	64.08	0	64.08	0	0
Kempas	2020A	3rd	0	62.31	62.31	0	1.43%
Kempas	2020B	3rd	0	60.13	60.13	0	1.38%
Kempas	2020C	3rd	0	54.61	54.61	0	1.25%
Kempas	2020D	3rd	0	74.30	74.30	0	1.70%
Kempas	2021A	3rd	0	80.66	80.66	0	1.85%

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Kempas	2021B	3rd	0	54.19	54.19	0	1.24%
Kempas	2021C	3rd	0	56.08	56.08	0	1.28%
Kempas	2022A	3rd	0	98.86	98.86	0	2.26%
Kempas	2022B	3rd	0	61.00	61.00	0	1.40%
Kempas	2022C	3rd	0	66.08	66.08	0	1.51%
Kempas	2023A	3rd	0	49.13	49.13	0	1.12%
Kempas	2023B	3rd	0	93.27	93.27	0	2.14%

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Table 7 Planting profile for Tangkah Estate

Estate	Year of planting	Planting Cycle	Mature > 3years (Ha)	Immature < 3 years(Ha)	Planted area	% of planted area mature	% of planted area immature
Tangkah	2020A	2nd	0	61.88	61.88	0	3%
Tangkah	2020B	2nd	0	49.85	49.85	0	2%
Tangkah	2020C	2nd	0	67.77	67.77	0	3%
Tangkah	2020D	2nd	0	47.9	47.9	0	2%
Tangkah	2021A	2nd	0	47.12	47.12	0	2%
Tangkah	2022A	2nd	0	53.7	53.7	0	2%
Tangkah	2022B	2nd	0	50.99	50.99	0	2%
Tangkah	2022C	2nd	0	22.38	22.38	0	1%
Tangkah	2023A	2nd	0	56.58	56.58	0	2%
Tangkah	2023C	2nd	0	74.96	74.96		3%
Tangkah	2001K	2nd	56.21	0	56.21	2%	0
Tangkah	2005A	2nd	92.5	0	92.5	4%	0
Tangkah	2005N	2nd	51.38	0	51.38	2%	0
Tangkah	2006B	2nd	64.41	0	64.41	3%	0
Tangkah	2006B1	2nd	76.34	0	76.34	3%	0
Tangkah	2006K	2nd	73.16	0	73.16	3%	0
Tangkah	2007K	2nd	43.85	0	43.85	2%	0
Tangkah	2008A	2nd	65.67	0	65.67	3%	0
Tangkah	2008B1	2nd	74.75	0	74.75	3%	0
Tangkah	2008B2	2nd	57.77	0	57.77	2%	0
Tangkah	2000A	2nd	59.8	0	59.8	3%	0
Tangkah	2000A1	2nd	43.3	0	43.3	2%	0
Tangkah	2000B	2nd	48.73	0	48.73	2%	0
Tangkah	2001A	2nd	66.14	0	66.14	3%	0
Tangkah	2001C	2nd	36.07	0	36.07	2%	0
Tangkah	2001D	2nd	97.11	0	97.11	4%	0
Tangkah	2001G	2nd	66.22	0	66.22	3%	0
Tangkah	2002A	2nd	49.53	0	49.53	2%	0
Tangkah	2002C	2nd	53.4	0	53.4	2%	0
Tangkah	2006C	2nd	13.8	0	13.8	1%	0
Tangkah	2009B	2nd	55.79	0	55.79	2%	0
Tangkah	2009C	2nd	63.55	0	63.55	3%	0
Tangkah	2009D	2nd	40.93	0	40.93	2%	0
Tangkah	2009M	2nd	66.92	0	66.92	3%	0
Tangkah	2009N	2nd	63.94	0	63.94	3%	0
Tangkah	2010A	2nd	44.85	0	44.85	2%	0
Tangkah	2010K	2nd	28.54	0	28.54	1%	0
Tangkah	2011A	2nd	43.13	0	43.13	2%	0
Tangkah	2011B	2nd	25.13	0	25.13	1%	0
Tangkah	2012A	2nd	67.26	0	67.26	3%	0
Tangkah	2013A	2nd	82.84	0	82.84	4%	0
Tangkah	2018A	2nd	54.04	0	54.04	2%	0

Table 8 Planting profile for Serkam Estate

Estate	Year of planting	Planting Cycle	Mature >3 years (Ha)	Immature <3 years(Ha)	Planted area	% of planted area mature	% of planted area immature
Serkam	2001H	2 nd	12.81	0	12.81	0.70%	0
Serkam	2001J	2 nd	20.71	0	20.71	1.14%	0
Serkam	2002D	2 nd	40.88	0	40.88	2.24%	0
Serkam	2002E	2 nd	81.6	0	81.6	4.48%	0
Serkam	2002G	2 nd	53.35	0	53.35	2.93%	0
Serkam	2002K	2 nd	44.17	0	44.17	2.42%	0
Serkam	2005J	2 nd	74.58	0	74.58	4.09%	0

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Serkam	2005K	2 nd	79.89	0	79.89	4.39%	0
Serkam	2006A	2 nd	47.56	0	47.56	2.61%	0
Serkam	2006B	2 nd	73.43	0	73.43	4.03%	0
Serkam	2007A	2 nd	87.13	0	87.13	4.78%	0
Serkam	2009A	2 nd	98.54	0	98.54	5.41%	0
Serkam	2010A	2 nd	81.68	0	81.68	4.48%	0
Serkam	2010B	2 nd	34.32	0	34.32	1.88%	0
Serkam	2013A	2 nd	80.72	0	80.72	4.43%	0
Serkam	2013B	2 nd	53.14	0	53.14	2.92%	0
Serkam	2013C	2 nd	64.92	0	64.92	3.56%	0
Serkam	2013D	2 nd	59.06	0	59.06	3.24%	0
Serkam	2015A	2 nd	57.64	0	57.64	3.16%	0
Serkam	2015B	2 nd	70.43	0	70.43	3.87%	0
Serkam	2016A	2 nd	95.72	0	95.72	5.25%	0
Serkam	2016B	2 nd	72.08	0	72.08	3.96%	0
Serkam	2017A	2 nd	71.61	0	71.61	3.93%	0
Serkam	2017B	2 nd	69.2	0	69.2	3.80%	0
Serkam	2018A	2 nd	90.95	0	90.95	4.99%	0
Serkam	2019A	2 nd	85.17	0	85.17	4.67%	0
Serkam	2019B	2 nd	41.09	0	41.09	2.26%	0
Serkam	2019C	2 nd	79.51	0	79.51	4.36%	0

Table 8 Planting profile for Kemuning Estate

Estate	Year of planting	Planting Cycle	Mature >3 years (Ha)	Immature < 3years(Ha)	Planted area	% of planted area mature	% of planted area immature
Kemuning	1999	2nd	53.58	0	53.58	2.26%	0
Kemuning	1999	2nd	60.79	0	60.79	2.57%	0
Kemuning	1999	2nd	57.93	0	57.93	2.45%	0
Kemuning	2000	2nd	63.18	0	63.18	2.67%	0
Kemuning	2000	2nd	44.39	0	44.39	1.87%	0
Kemuning	2000	2nd	59.00	0	59.00	2.49%	0
Kemuning	2000	2nd	81.67	0	81.67	3.45%	0
Kemuning	2000	2nd	88.85	0	88.85	3.75%	0
Kemuning	2000	2nd	64.95	0	64.95	2.74%	0
Kemuning	2001	2nd	50.47	0	50.47	2.13%	0
Kemuning	2001	2nd	66.23	0	66.23	2.80%	0
Kemuning	2001	2nd	43.09	0	43.09	1.82%	0
Kemuning	2001	2nd	36.31	0	36.31	1.53%	0
Kemuning	2002	2nd	49.58	0	49.58	2.09%	0
Kemuning	2002	2nd	21.85	0	21.85	0.92%	0
Kemuning	2002	2nd	23.35	0	23.35	0.99%	0
Kemuning	2002	2nd	95.78	0	95.78	4.04%	0
Kemuning	2002	2nd	97.1	0	97.1	4.10%	0
Kemuning	2005	2nd	40.13	0	40.13	1.69%	0
Kemuning	2005	2nd	65.33	0	65.33	2.76%	0
Kemuning	2005	2nd	12.88	0	12.88	0.54%	0
Kemuning	2006	2nd	67.32	0	67.32	2.84%	0
Kemuning	2007	2nd	31.65	0	31.65	1.34%	0
Kemuning	2007	2nd	71.86	0	71.86	3.03%	0
Kemuning	2007	2nd	50.6	0	50.6	2.14%	0
Kemuning	2008	2nd	41.41	0	41.41	1.75%	0
Kemuning	2009	2nd	47.04	0	47.04	1.99%	0
Kemuning	2009	2nd	62.62	0	62.62	2.64%	0
Kemuning	2010	2nd	35.81	0	35.81	1.51%	0
Kemuning	2010	2nd	10.89	0	10.89	0.46%	0
Kemuning	2010	2nd	70.01	0	70.01	2.96%	0
Kemuning	2010	2nd	89.88	0	89.88	3.79%	0
Kemuning	2011	2nd	53.95	0	53.95	2.28%	0

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Kemuning	2012	2nd	51.62	0	51.62	2.18%	0
Kemuning	2013	2nd	57.18	0	57.18	2.41%	0
Kemuning	2013	2nd	59.4	0	59.4	2.51%	0
Kemuning	2013	2nd	34.47	0	34.47	1.46%	0
Kemuning	2014	2nd	29.22	0	29.22	1.23%	0
Kemuning	2014	2nd	32.94	0	32.94	1.39%	0
Kemuning	2014	2nd	42.58	0	42.58	1.80%	0
Kemuning	2015	2nd	20.97	0	20.97	0.89%	0
Kemuning	2015	2nd	37.12	0	37.12	1.57%	0
Kemuning	2017	2nd	33.56	0	33.56	1.42%	0
Kemuning	2017	2nd	39.85	0	39.85	1.68%	0
Kemuning	2021B	2nd	0	64.4	64.4	0.00%	2.72%
Kemuning	2021B	2nd	0	55.87	55.87	0.00%	2.36%
Kemuning	2014	2nd	29.22	0	29.22	1.23%	0
Kemuning	2014	2nd	32.94	0	32.94	1.39%	0
Kemuning	2014	2nd	42.58	0	42.58	1.80%	0
Kemuning	2015	2nd	20.97	0	20.97	0.89%	0
Kemuning	2015	2nd	37.12	0	37.12	1.57%	0
Kemuning	2017	2nd	33.56	0	33.56	1.42%	0
Kemuning	2017	2nd	39.85	0	39.85	1.68%	0
Kemuning	2021A	2nd	0	55.87	55.87	0.00%	2.36%
Kemuning	2021B	2nd	0	64.4	64.4	0.00%	2.72%

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Shylaja Devi Vasudevan Nair
Position	:	General Manager (VP I), Group Sustainability
Address	:	No 2, Jalan PJU 1A/7, Ara Damansara, 47301, Petaling Jaya, Selangor, Malaysia
Phone no.	:	0122983510
Fax no.	:	-
Email	:	shylaja.vasudevan@simedarbyplantation.com

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3.0 AUDIT FINDINGS

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

There was no significance 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 :

SDP is progressively undergoing the RSPO Certification process towards 100% RSPO
certification of estates/mills.

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

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

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

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

If no, please state reasons The mill only processed FFB from SDP estates

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 since the last audit

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

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

3.5. Complaint received from stakeholder (if any)

No complaint received from stakeholder

4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s) List : 1 3.3.2

Total no. of major NCR(s) List : Nil

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

Total no. of minor NCR(s) List : Nil

Total no. of major NCR(s) List : Nil

5.0 AUDIT CONCLUSION

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

6.0 RECOMMENDATION

☐ No NCR recorded. Recommended to continue certification.

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

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

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

☒ Recommended to continue certification.

☐ Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 90 days of the audit. Recommended for suspension of the certificate.

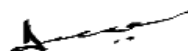
Note: Major NCRs which are not addressed within a further 90 days shall result in the certificate being withdrawn.

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 :

AMIR B BAHARI

(Name)



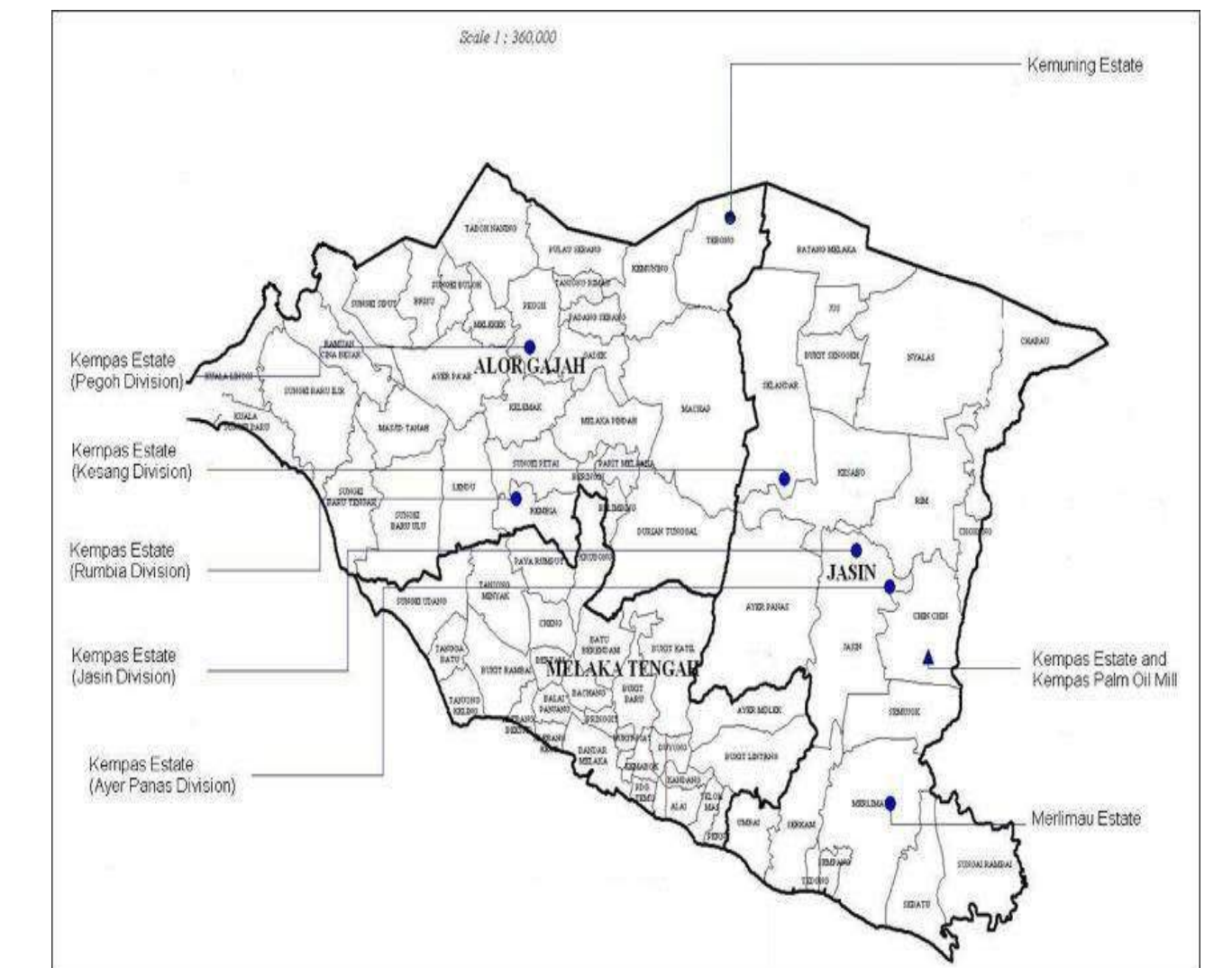
(Signature)

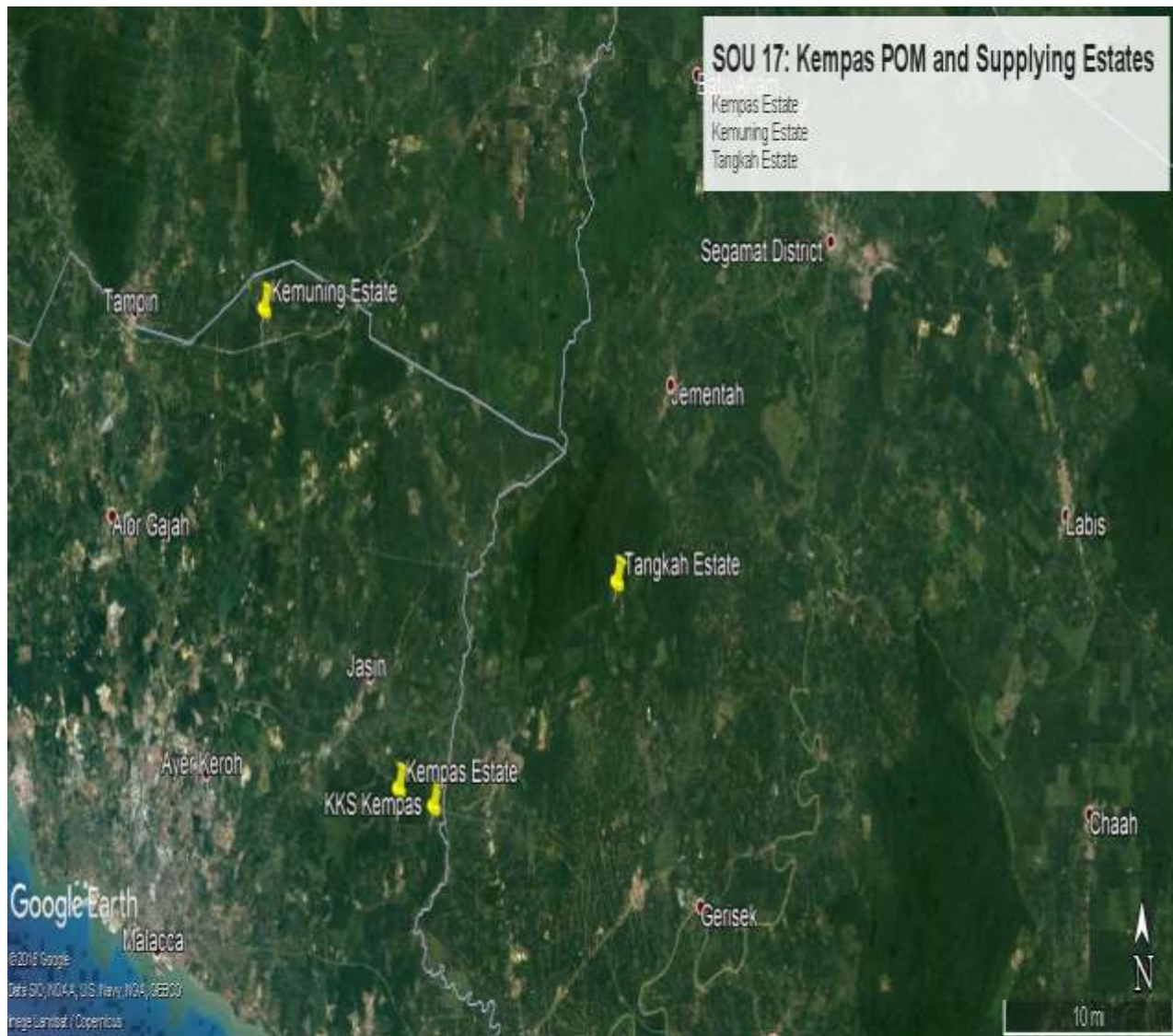
30/04/2023

(Date)

RSPO P&C PUBLIC SUMMARY

Attachment 1 - Map





SURVEILLANCE AUDIT 3 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** : 20th March to 22nd and 24th March 2023

3. **Site of assessment** Kempas Certification Unit
 a) Kempas Palm Oil Mill
 b) Kempas Estate
 c) Tangkah Estate
 d) Serkam Estate
 e) Kemuning 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

- (i) Audit Team Leader: Amir Bin Bahari (ABB) – Safety Environment TBP, Metric Template
- (ii) Auditor : Dzulfikar Bin Azmi (DA) - Social (Internal Stakeholder)
 Rozaimee Bin Ab Rahman (RAR) – Safety Environment
 Mohd Zulfakar Bin Kamaruzaman (MZK) – HCV, External Stakeholder
 Selvasingam T. Kandiah (STK) - GAP Safety
 Mohd Ab Raouf Bin Asis (MAR) – SCCS, Social

(iii) Witnessed : N/A

(iv) Technical expert : N/A

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): **Jan 2022 to Dec 2022**, and
 - ii. 12 month period counting up to two months before audit month: **Jan 2022 to Dec 2022**
- b) Reporting time frames for demographic data:
 - i. For mill and estate workers: **as of 31 Dec 2022**
 - ii. For smallholders and outgrowers: **Jan 2022 to Dec 2022**
- c) Reporting time frame for all other social and environmental data: **Jan 2022 to Dec 2022**

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. Recurring major non-conformities on the same indicator in successive surveillance audits shall result in the immediate suspension of the RSPO P & C certification shall be recommended.

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.

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Date / Time	Coverage of assessment / Activity / Site	STK	AB	RAR	MAR	DA	MZK
Day 0 – 19/3/23 (Sunday)	All auditors travel to accommodation site	/	/	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	STK	AB	RAR	MAR	DA	MZK
Day 1-20/3/23 (Monday) 9.00am – 9.30am	Opening Meeting – Venue: To be advised <ul style="list-style-type: none"> Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings. 	/	/	/	/	/	/
9.30am – 1.00pm	Site observation to Tangkah Estate P1, P2, P3,P4,P5, P6, P7 <ul style="list-style-type: none"> Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Occupational safety & health aspects, chemical management Good Milling Practice / Good agricultural practices Legal & Other requirement Environmental management, waste & chemical management GHG Calculation New planting 	/		/		/	/
1.00pm – 2.00pm	Lunch Break	/		/		/	/
1.30pm – 5.00pm	Continue assessment at respective sites	/		/		/	/
	Kempas POM						
Day 1-20/3/23 (Monday) 9.00am – 9.30am	Site observation to Kempas POM (AB MAR) P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Supply Chain Verification of basic information mill/Metric templates Confirmation of time bound plan & review of partial certification Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative/Union, contractors, 		/		/		

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	supplier, etc.						
	<ul style="list-style-type: none"> Land titles user rights GHG Calculation 						
1.00pm – 2.00pm	Lunch Break		/		/		
1.30pm – 5.00pm	Continue assessment at respective sites		/		/		
Date / Time	Coverage of assessment / Activity / Site	STK	AB	RAR	MAR	DA	MZK
Day 2 – 21/3/23 (Tuesday) 9.00am – 1.00pm	Site observation to Kemuning Estate P1, P2, P3,P4,P5, P6, P7 <ul style="list-style-type: none"> Verification of basic information estate/Metric templates Confirmation of time bound plan & review of partial certification Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. GHG Calculation New planting 	/	/	/		/	/
1.00pm – 2.00pm	Lunch Break	/	/	/		/	/
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/		/	/
	Kempas POM						
Day 2-21/3/23 (Tuesday) 9.00am – 9.30am	Site observation to Kempas POM (MAR) P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Supply Chain Verification of basic information mill/Metric templates Confirmation of time bound plan & review of partial certification Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. 				/		
1.00pm – 2.00pm	Lunch Break				/		
1.30pm – 5.00pm	Continue assessment at respective sites				/		

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Date / Time	Coverage of assessment / Activity / Site	STK	AB	RAR	MAR	DA	MZK
Day 3 – 22/3/23 (Wednesday) 8.30am – 1.00pm	Site observation to Serkam Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. • GHG Calculation • New planting 	/	/		/	/	/
1.00pm – 2.00pm	Lunch Break	/	/		/	/	/
1.30pm – 5.00pm	Continue assessment at respective site	/	/		/	/	/
Day 3-22/3/23 (Wednesday) 9.00am – 9.30am	Site observation to Kempas POM (RAR) P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Supply Chain • Verification of basic information mill/Metric templates • Confirmation of time bound plan & review of partial certification • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. 			/			
1.00pm – 2.00pm	Lunch Break			/			
1.30pm – 5.00pm	Continue assessment at respective sites			/			

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Date / Time	Coverage of assessment / Activity / Site	STK	AB	RAR	MAR	DA	MZK
Day 5 – 24/3/23 (Friday) 8.30am – 1.00pm	Site observation to Kempas POM (DA, RAR) P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Supply Chain • Verification of basic information mill/Metric templates • Confirmation of time bound plan & review of partial certification • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • GHG Calculation 			/		/	
1.00pm – 2.00pm	Lunch Break			/		/	
2.00pm – 5.00pm	Continue assessment at respective site			/		/	
Date / Time	Coverage of assessment / Activity / Site	STK	AB	RAR	MAR	DA	MZK
Day 5 – 24/3/23 (Friday) 8.30am – 1.00pm	Site observation to Kempas Estate (STK AB MAR MZK) P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. • GHG Calculation 	/	/		/		/
12.30pm – 2.30pm	Lunch Break - Friday Prayers	/	/	/	/	/	/
2.30pm –3.00pm	Continue assessment at respective site	/	/	/	/	/	/
2.30pm –4.00pm	Audit Team Discussion	/	/	/	/	/	/
4.00pm – 5.00pm	Closing meeting	/	/	/	/	/	/

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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	SOU 17 Kempas CU continued to use the internet to disseminate public information relating to company policies, land titles, human rights, FPIC, safety and health plans, pollution prevention plans and the procedure for complaints and grievances. The SDPB website address is http://www.simedarbyplantation.com/ . For social programmes on education, environment, community and health, etc, Yayasan Sime Darby as the Foundation has expanded its wings from offering scholarships to outstanding and deserving individuals to funding impactful conservation, outreach and development programmes. The SDPB website address is http://www.yayasansimedarby.com/ .
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	Yes	SOU Kempas has conducted meeting with the stakeholder to share any new information, in appropriate language on RSPO certification, environmental, social, safety and legal requirement applied to all operating units. All the stakeholders have raised some issue and discussed with the management during the meeting. Evidence of the above stakeholder consultation conducted are available and the stakeholder feedback were recorded in the SIA and EIA action plan. Furthermore, SOU 17 Kempas CU continued to use the internet to disseminate public information relating to land titles, human rights, FPIC, safety and health plans, pollution prevention plans and the procedure for complaints and grievances. The SDPB website address is http://www.simedarbyplantation.com/
	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 procedure for handling request for information is stated in Section 3 – Documentation and Communication of the Plantation Quality Management System Manual. Kempas CU continued to maintain the records of requests for information and responses are maintained which included the government agencies/ regulatory bodies, local communities, etc.

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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	Sime Darby Plantations Berhad has developed an SOP known as Consultation and Communications procedures documented in the Standard Operating Manual. These Procedures have been communicated to workers during muster briefings and workers who were interviewed confirmed their understanding of the communication procedures in place.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	Yes	Stakeholder list FY 2023 was established in both mill and estate on 2/1/2023. Stakeholders, internal and external, such as workers representatives, gender committee, local communities, authorities, contractors, suppliers, FFB suppliers and NGOs were included in the list.
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	Yes	The contracts between Sime Darby Plantation Berhad and its contractors contain a clause which requires the contractors to abide by Sime Darby's COBC (also included the clause for 'Counter Financing of Terrorism').
	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 Plantation Berhad's vendors which includes expectation to uphold human rights.

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	Kempas CU as SOU 17 continued to comply with the relevant legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and GSD sustainability team. SOU 17 had obtained and renewed license and permits as required by the law.

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Clause	Indicators	Comply Yes/No	Findings
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	Yes	The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them. Each estate and mill had its own Legal and Other Requirements Register (LORR) and were evaluated individually annually for compliance. The legal registers were updated by the person in-charge and approved by the respective Managers. Recent review was on Jan 2023. The GSD is responsible for tracking changes and the information was disseminated to all its plantations and Mill department.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	Yes	Legal or authorized boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorized boundaries.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	Yes	The stakeholder lists for all the units, namely Kempas POM, Kempas, Serkam, Tangkah and Kemuning Estates, were all available and sighted during the surveillance audit. The lists were updated as of Jan 2023 and they comprise relevant government agencies such as MPOB, Department of Immigration, Department of Environment, Labour Department) the Indonesian consulate, nearby schools, nearby villages, harvesting contractors, suppliers, transporters, replanting contractors, etc. The contact addresses of all contractors are detailed in the Stakeholders list.
	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	Yes	All contracts, 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, service providers and labour contractors were available. There is evidence that agreements with third parties contain clauses on meeting applicable legal requirements and diligence carried out include getting the vendors to sign the Vendor Integrity Pledge where they undertake to comply with rules relating to labour and human rights, company ethics and management practices, and would comply with all laws and regulations relating to anti-bribery, fraud and corruption.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	Yes	All contracts signed with contractors contain a clause on compliance with employment laws, which would include laws related to employment of children and young persons. Contractors also sign the Vendor Integrity Pledge in which Vendors undertake to comply with the Vendor COBC. The Vendor COBC in turn, contains provisions which state that Vendors shall not employ anyone under the age of 18 or the applicable minimum legal age in the countries they operate, unless in vocational and/ or formal and structured apprenticeship, educational and training programmes.

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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	Commencing May 2020, Kempas Palm Oil Mill became an Identity Preserved Mill and therefore only receives and processes FFB from its own internal sources namely Kempas Estate, Kemuning Estate, Tangkah Estate, Serkam Estate and other SD group of estates. These Estates have its own MPOB licenses and information of Geo-locations of FFB origins. No FFB supplies are received from smallholders.
	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	No FFB supplies are received from smallholders, and therefore this Indicator is not applicable. Therefore, Kempas Palm Oil Mill does not process any FFB from any collection centers, agents or intermediaries.

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	Yes	The 4 estates, Tangkah, Kemuning, Kempas and Serkam continued to be committed to long-term economic and financial viability. The annual budgets for 2023 to 2027 were sighted. The budget covers activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance etc. The budget also included projections on yield/ha, and total cost of production per m ton & per ha and CAPEX – capital expenditure mainly for buildings, furniture and others asset related expenses.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	Yes	The long-range replanting programs (LRRP) until 2027 were sighted on all four Estates. The program was reviewed once a year and incorporated into their annual financial budget.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the	Yes	SOU Kempas 17 continued to hold management reviews at planned intervals, that is once a week after internal audits. During the review matters related to RSPO/MSPO internal audit results especially and corrective action plan taken based on assessment findings were discussed. For reviewing process performance management had carried

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Clause	Indicators	Comply Yes/No	Findings
	activities undertaken.		<p>out internally meetings & during muster call to discuss related crop quality, etc. The latest management reviews were held after internal RSPO/MSPO audits, records reviewed. The agenda of the meeting was to discuss related (input & output):</p> <ul style="list-style-type: none"> a) Results of Internal audit b) Customer feedback c) Process performance & product conformity d) Status of preventive & corrective actions e) Follow up action from management review f) Sustainability Management g) Changes that could affect the management system h) Recommendations for improvement <p>All NCR raised were closed prior to the external audit.</p>
3.2 The CU regularly monitors and reviews their economic, social and env 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	This has been established in the Continuous Improvement Plan 2023 updated in Jan 2023 respectively for all units. This compilation was made with subject to the consideration of the main social and environmental impacts. These include continuing engagement with relevant stakeholders (workers, surrounding communities, government agencies, agencies, suppliers and contractors. Management documents related to environmental plans and impact assessments remained available.
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	Yes	The monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template together with palm trace renewal.
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOP) for the unit of certification are in place.	Yes	SOU 17 Kempas continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, and others, had followed the established SOP.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	No	<p>Both the estates and the mill had an established mechanism to perform checking to ensure consistent implementation of procedures, such as Daily Production Report, Unscheduled General Manager, Internal audit, Regulatory Body etc.</p> <p>However, it was noted that the mechanism to check implementation of PPE procedure was not complied with. In Tangkah Estate during site inspection at harvesting area, sighted the sampled harvesters did not wear appropriate PPE according to Safe Work Procedure and HIRARC. Sighted 4 harvesters did not wear Wellington Boot during performing their work. <i>As a result, Minor DA 01 2023 was raised.</i></p>

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Clause	Indicators	Comply Yes/No	Findings
	3.3.3 Records of monitoring and any actions taken are maintained and available.	Yes	The implementation of SOP is monitored on a daily basis by the field staffs and Assistant Managers with overall overview by the Managers. The monitoring is done via supervision and records maintenance. The estates among others maintained the records, which was viewed during the audit.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	Yes	There are no new plantings or operations within SOU 17 Kempas CU. However there were plans and impact assessments relating to environmental impacts based on documents as following; Environmental Aspect and Impact Evaluation Procedure, and Environmental Aspect and Impact Identification form. Recent review for CAPEX/OPEX projects planned in relation to both social and environmental enhancement. Factors relating to safety improvement is also being considered prior to projects confirmation. It was properly documented and reviewed during the conduct of audit.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	Yes	The mill and estates have continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan and Environmental Management Program. Managers and Assistant Managers of mill and estates were identified as person-in-charge of the programs which were established upon review of the aspect and impact register. It was observed that the reviewing and updating on the registers were made annually if there's no any new activity within respective sites. Social Impact Assessment (SIA) Report for Kempas CU (SOU 17 Kempas) was verified. The SIA was done by Social & Environmental Project Unit, GSD/RSQM Department. Internal and external stakeholders were consulted during the assessment. The assessments were used methodology of interview workers based on workstation, harvesters, sprayers, worker representatives, gender committee, contractor, supplier, local community, 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.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	Yes	The Social/Environmental Action Plan available for each unit were available having information i.e issues, management plan, PIC and time frame. The social management action plans are being reviewed and updated on an annual basis at Kempas CU. This takes into account inputs from external stakeholder meetings, Social Dialog, NUPW meetings, OSH Committee meetings, as well as Women & Children Committee meetings. Evidence of the above stakeholder consultation conducted are available and the stakeholder feedback were recorded in the SIA action plan.

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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	SDP has developed Workforce Management Unit Liaison & Recruitment Procedure: Hiring local workers - SOP Hiring of Local Workers, Hiring foreign workers, Termination – Industry Relation Manual and Migrant Worker responsible Recruitment Procedure. The recruitment process was clearly stated in the procedure where the recruitment was based age, medical fitness and etc. There is no discrimination based on religion, gender, nationality and etc during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc.
	3.5.2 Employment procedures are implemented, and records are maintained.	Yes	For local workers, application form, employment interview assessment form, medical check-up report and employment contract was sighted for new recruited employees. However, interviews with sampled new Indonesian workers who were recruited in Oct. 2022 and Feb. 2023 revealed that certain sampled workers still paid sums of money to the recruiter/overseas agent known in order to secure their jobs. Based on consultation with representatives from GSD, and involved recruitment agencies, this concerned issues have been acknowledged by them and, it is still under investigation process and the action plan is carried out accordingly.
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	Yes	The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following; <ul style="list-style-type: none"> a) Change in work process b) Revision/changes in legislative requirement c) Occurrence of accidents The estates had review on HIRARC dated Jan 2023 respectively for the estates and mill. Amendments are summarized in a list detailing dates and reasons for updates. Appropriate risk control measures were determined and implemented for the respective activities and operation. Appropriate administrative controls such as safety signage were displayed at all work stations in the mill and estate office and workshop. In general, the control measures were appropriate to the identified risks.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people are monitored.	Yes	The effectiveness of implementation health & safety plan has been monitored by daily basis. 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. SDPB Health and Safety plan among others include the following: <ul style="list-style-type: none"> a) To ensure zero class 1 occupational accident. b) Reduction in 50% LTI frequency rate c) to ensure zero compounds and penalty by the authority

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Clause	Indicators	Comply Yes/No	Findings
			The implementation of OSH plan was monitored by internal audits conducted by OSH officers from GSD / RSQM department.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	Yes	Formal training programs for 2023 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 unit were established covered staff, workers, pregnant women, etc. A training need identification matrix has been established with target dates for the training identified.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	Yes	The records included information on the title of the training course, the name and signature of the attendees, name of the trainer, time and venue. Records reviewed during the conduct of audit.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Yes	It was evident that the training on supply chain was conducted in Feb & Mar 2023 for employees handle critical operation i.e., weighbridge operator, auxiliary police, & weighbridge operator.

SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO	Yes	Kempas POM has continued to maintain Identity Preserved model. Kempas POM obtained certified FFB from owned estate such as: i. Kempas Estate ii. KemuningEstate iii. Tangkah Estate iv. Serkam Estate Other than the above, the mill received and processed certified FFB from other SOU diverted crop i.e., SOU Diamond Jubilee and SOU Pagoh. Thus, Kempas POM has qualified for the Identity Preserved supply chain system and

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	certified products. If a mill process certified and uncertified FFB without physically separating them, the inly MB Module is applicable.		module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.
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 due to Kempas POM using 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 surveillance report.	Yes	As provided in the report above – Table 3 (actual) & 4 (projection).
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	Yes	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information were: i. Name: Kempas Oil Mill ii. Country: Malaysia. iii. Member ID: RSPO_PO1000000347 iv. Member Category: Oil Mil v. Core product: Palm Oil Upgraded to Identity Preserved on June 2019. Copy of Shipping Announcement was provided during the audit as evident of compliance to reporting requirement as listed by the standard.

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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 supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard. • The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 	Yes	The site has updated written procedures to ensure the implementation of applicable supply chain model specified i.e., RSPO Supply Chain Certification Standard 2020.

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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 non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports. 	Yes	<p>RSPO internal audit was conducted in Jan 2023 by internal auditors team. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 4 major and 2 minor were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.</p>
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	Yes	<p>KPOM had continued to receive certified FFBs from the CU's own supply bases as well as other CU supply bases i.e SOU Diamond Jubilee and SOU Pagoh. There were 4 supply bases (estates) sending certified FFBs to KPOM. They were Kempas Estate, Kemuning Estate, Tangkah Estate and Serkam Estate. The validity of the certificate of the supplier has been checked accordingly. Sighted FFB consignment note for Kempas Estate, Kemuning Estate, Tangkah Estate and Serkam Estate and among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Monitoring records titled as <i>"RSPO & MSPO Mass Balancing Records for Oil Mills"</i> has recorded the tonnage of certified FFB and its supplying estate.</p> <p>Verified through Kempas POM weighing system called 'SimeWeigh' and random sample of weighbridge ticket from Kempas Estate, Kemuning Estate, Tangkah Estate and Serkam Estate. There was no non-certified FFB received based on the records.</p>

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

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance. 	Yes	<p>There are 4 outsource company CPO & PK transporter and EFB & POME transporter , and the agreement document concerning the transporters was available and the RSPO supply chain requirement were communicated to them.</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 transporters were made available and up-to-date in the stakeholder list, updated as of Feb 2022.
3.8.11	The mill shall inform its CB in advance prior to conducting its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Yes	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	Yes	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up-to-date.
	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Yes	Relevant record was maintained for more than 2 years as per Standard operating procedure for Sustainability Supply Chain and Traceability.
	iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	Yes	Sighted record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to	Yes	Not applicable CU used IP model

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).		
3.8.13	Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	Yes	Kempas POM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER).
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.		
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	Yes	Global Trading & Marketing (GTM) office informed KPOM by e-mail on the dispatch of RSPO certified CPO/ PK to relevant buyer. The dispatch of the RSPO certified CPO/ PK to buyer by Kempas POM were made based on a specific contract. The receiving pit, pipelines and tanks in Kempas POM were thoroughly cleaned, swept and flushed before RSPO certified CPO was pumped in to avoid contamination. Dedicated tanks were used to store RSPO certified CPO produced. For traceability of a specific batch of RSPO certified CPO back to the supplying POM, Kempas POM kept the relevant documents such as the weighbridge ticket, CPO dispatch note.
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	Yes	The registration of transaction being carried out by Group Plantation Marketing subordinate. Mill receives copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform</p>		
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	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. KPOM has not use RSPO corporate logo as well as trademark logo.

Principle 4: Respect community and human rights and deliver benefits

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

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	Yes	The policy to respect human rights is documented in SDP's Group Sustainability & Quality Policy Statement dated 2 Dec 2019 and supported by our Responsible Agriculture Charter (RAC) and Human Rights Charter (HRC) https://simeidarbyplantation.com/sustainability/reports-policies-and-statements/ . These policies were 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 during stakeholder meetings, policy briefings and ILO briefing.
	4.1.2 The unit of certification does not instigate violence or use any form of	Yes	There is no evidence of any use of violence or the instigation of violence within the Kempas SOU. This was further verified during interviews held with external stakeholders and security personnel.

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Clause	Indicators	Comply Yes/No	Findings
	harassment in their operations.		
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	Yes	There is Internal and External Complaint Book was used for employees, and external parties to lodge complaint respectively. SDP has established complaint channel such as Suara Kami, Workers Helpline, Whistleblowing and also supported with Social Dialog (conducted fortnightly basis). This channel and mechanism are 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.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Yes	To ensure that illiterate parties also understand the procedures, verbal, practical demonstration and pictorial briefings are given are translated into the language the affected parties understand. This was confirmed during interview with workers at Kempas CU, they were satisfied with the channel provided by Sime Darby Management as outcome through this channel is fast and effective.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	Yes	The system used by the Kempas CU in resolving disputes and grievances exists in the procedure called "Procedure for Handling Social Issues", and "Carta Aliran Pengendalian Isu Sosial". The conflict resolution mechanism includes the option of access to independent legal and technical advice. The complainants may choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. When ensuring anonymity of complainants and whistle-blowers, the Sime Darby Code of Business Conduct provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ. However, based on interviews conducted, Sime Darby's whistleblower policy is not widely known to the workers. There is also the newly developed web based "Suara Kami helpline" available for workers and public to raise grievances and complaints.
	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	Paragraph 7 of Appendix 5 Sustainable Plantation Management System, Flowchart and Procedure on Handling Social Issues, states upon failure of negotiation process involving estates management, representatives from the disputed parties, zone heads, third parties and stakeholders, legal proceedings may follow. Paragraph 8 of Appendix 3 of the same document on procedures Handling Land Disputes states that "further negotiation processes may involve independent third parties such as representatives from the Land Office or from other NGOs."

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Clause	Indicators	Comply Yes/No	Findings
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	Yes	Contribution of Kempas SOU 17 CU to local communities among others include the following: Saringan Kesihatan Pekerja, Gotong Royong, Menyampaikan sumbangan kit makanan kepada penduduk cina yang kurang berkemampuan pada Tahun Baru Cina.
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.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby since 1980. From the interviews, it can be concluded that there was no evidence of any land dispute at Kempas CU.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.		
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or		

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Clause	Indicators	Comply Yes/No	Findings
	withhold their consent to the operation at the time that these decisions were taken.		
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	Yes	
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Kempas since 1980. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. From the interviews, it can be concluded that there was no evidence of any land dispute at Kempas CU.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	Yes	As above.
	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	No land dispute as mentioned above, hence this requirement is not needed and not applicable for the CU.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually	Yes	No land dispute as mentioned above, hence this requirement is not needed and not applicable for the CU.

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Clause	Indicators	Comply Yes/No	Findings
	reviewed in consultation with affected parties.		
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	Yes	Based on Social Impact Assessment (SIA) Report for SOU Kempas and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Sime Darby SOU Kempas since 1980. The audit team had confirmed that there were no land issues related to previous owners.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	Yes	
	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 ops.	Yes	

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Clause	Indicators	Comply Yes/No	Findings
	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 reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sime Darby SOU Kempas since 1980. From the interviews, it can be concluded that there was no evidence of any land dispute at Kempas CU.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	Yes	
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	Yes	
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	Yes	There was 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,	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

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Clause	Indicators	Comply Yes/No	Findings
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.			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 Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at mill and visited estates.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	Yes	There were no scheme small holdings at SOU Kempas. The Fresh Fruit Bunches are supplied from SDPB owned estates which are certified to RSPO.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	Yes	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of 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	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. Negotiated agreements, compensation and payments to any affected parties are not applicable for Kempas CU.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place	Yes	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighbouring estate. From the interviews, it can be concluded that there was no evidence of any land dispute at Kempas CU. Negotiated agreements, compensation and payments to any affected parties are not applicable for Kempas CU.

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Clause	Indicators	Comply Yes/No	Findings
	and documented and made available to affected parties.		
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	Yes	It has been verified that the land is legitimately owned by Sime Darby SOU Kempas since 1980. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy of the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. From the interviews, it can be concluded that there was no evidence of any land dispute at Kempas CU.
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 Sime Darby SOU Kempas since 1980. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. From the interviews, it can be concluded that there was no evidence of any land dispute at Kempas CU.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	Yes	Land conflict is not present in the area of the unit of certification. It was evident from the interviews, it can be concluded that there was no evidence of any land dispute at Kempas CU.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current	Yes	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.

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Clause	Indicators	Comply Yes/No	Findings
	operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant reqs. (Indicators 4.4.2, 4.4.3 and 4.4.4).		
	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	From the interviews, it can be concluded that there was no land conflict or dispute at SOU Kempas.

Principle 5: Support smallholder inclusion

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Yes	Since June 2019, Kempas Palm Oil Mill became an Identity Preserved Mill (and therefore only receives and processes FFB from its own internal sources namely Kempas Estate, Kemuning Estate, Tangkah Estate, Serkam Estate and other SD group of estates. No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Yes	No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes	Yes	Since June 2019, Kempas Palm Oil Mill became an Identity Preserved Mill and therefore only receives and processes FFB from its own internal sources namely Kempas Estate, Kemuning Estate, Tangkah Estate, Serkam Estate and other SD group of estates. No FFB supplies are received from smallholders, and therefore this Indicator is not applicable.

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Clause	Indicators	Comply Yes/No	Findings
	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.		applicable.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	Yes	There is evidence that contracts entered into with FFB and CPO transporters are fair, legal and transparent. Among others, the contracts are dated, with clear provisions on contract duration, scope of services, payment of fee, obligation and undertaking of parties, provisions related to default and termination, rights and obligations upon termination, clause on dispute, etc. Annex 2 and 3 of the contracts specify schedule of transportation rates and transport rate adjustment mechanism, respectively. Based on the review of the contracts and letter of award, all the provisions contained therein are legal in nature. Contractors interviewed also confirmed that the contracts are fair, legal and transparent.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Yes	Contracts with suppliers contain a provision that payments would be made within one month of invoice.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Yes	Weighing equipment verified through Metrology Department, the inspection was done on Kempas POM in Sept 2022. This was verified through Borang D (Timbang dan Sukat), Akta Timbang dan Sukat 1972, Peraturan-Peraturan Timbang Dan Sukat 1981 (Peraturan 16, 28A dan 45).
	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 Plantation Berhad 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. However, in SOU Kempas, Fresh Fruit Bunches are supplied from SDPB owned estates (Kempas, Serkam, Kemuning, Tangkah) which are certified to RSPO. There is no third-party FFB sent to the mill. Noted that SOU 17 Kempas has invited nearby smallholders to attend the Stakeholder meeting to promote on RSPO certification.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in	Yes	A grievance mechanism which respects anonymity and protects complainants is in place at the SOU Kempas as per the SOM Procedure for External Communication, and as per SOP Carta Aliran Pengendalian Isu Sosial. The procedures have been communicated to all levels of workforce and to all stakeholders during meeting in Feb & Mar 2023. As of to

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Clause	Indicators	Comply Yes/No	Findings
	a timely manner.		date there is no complaint by stakeholders.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	Yes	<p>Sime Darby Plantation Berhad 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.</p> <p>SOU 17 Kempas has invited nearby smallholders to attend the Stakeholder meeting Feb & Mar 2023. SOU 17 Kempas also encourages them to get the RSPO Certificate, however currently their preference is only MSPO as this certification is compulsory by the Government. Furthermore, SOU Kempas is IP-certified, and they don't have smallholders in their supply base.</p>
	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	SOU Kempas is IP-certified, and they don't have smallholders in their supply base, hence no smallholder support program established.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	SOU Kempas is IP-certified, and they don't have smallholders in their supply base, hence no promotion on legality of FFB production carried out.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Yes	SOU Kempas is IP-certified, and they don't have smallholders in their supply base, hence no pesticide handling training done.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Yes	SOU Kempas is IP-certified, and they don't have smallholders in their supply base, hence they don't have smallholder support program.

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Principle 6: Respect workers' rights and conditions

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

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	Yes	SDP 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 orientation, gender identity, union membership, political affiliation or age. SDP 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. SDP have committed to the policy of no recruitment fees. Fees for levy, medical examinations (FOMEMA), visa on arrival, visa endorsement, immigration security clearance, immigration service fee, PLKS (Pas Lawatan Kerja Sementara) fee, and travel from point of departure to designated SOU are all included. 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. However, it has been noted that there was one case under investigation related to this during the conduct of audit. The process is on-going, and it will be reviewed accordingly.
	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 evidence of any discrimination based on religion, gender, nationality etc., during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated.	Yes	Based on interviews with female workers, Estate 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

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Clause	Indicators	Comply Yes/No	Findings
	Alternative equivalent employment is offered for pregnant women.		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 & Quality Policy Statement covers the commitment facilitating the opportunity for advancement of women at all levels in our organization and ensuring their protection. Gender Committee was 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. Based on minutes sighted they have raised awareness, identified and addressed issues of concern, as well as opportunities and improvements for women. There was no sexual harassment case reported so far at all OU.
	6.1.6 There is evidence of equal pay for the same work scope.	Yes	The equal opportunities policy is contained within the policy of Group Sustainability and Quality Policy Statement, which states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. From the interview with workers local & migrant, female & male, they agreed that they have received equal pay for the work given. For mill and estates general workers they receive daily payment as per Minimum Wages Order 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 the Kempas 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.
	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	Yes	Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are in compliance with the Employment Act 1955, Minimum Wages Order 2022, SOCSO Act 1969, EPF Act 1991, EIS Act 2017, and the MAPA/NUPW agreement. Payroll documents, namely the payslip, also give accurate information on compensation for all work done. The working hours as per MAPA/NUPW Agreement were, working hours at 48 hours per

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Clause	Indicators	Comply Yes/No	Findings
	all work performed. This includes a form of record for work done by family members.		<p>week. For overtime, it has been mutually agreed upon between the management and workers and met the legal requirements. Overtime will be offered when there is additional job and no discrimination observed.</p> <p>Contracts and conditions of employment are contained in employment contracts signed between the Mill and respective estates on one hand, and their workers on the other. The employment contracts sampled were prepared in either Bahasa 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.</p>
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	Yes	<p>The Kempas 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 and MAPA/NUPW Palm Oil Mill Employees Agreement 2019. On regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>The working hours as per MAPA/NUPW Agreement were, working hours at 48 hours per week. For overtime, it has been mutually agreed upon between the management and workers and met the legal requirements. Overtime will be offered when there is additional job and no discrimination observed.</p> <p>Estate Medical Assistant interviewed during the audit also confirmed that workers with medical certificates are given a paid medical leave, and female workers are given 3 months paid maternity leave. There is no evidence of termination, and so compliance with reasons for dismissal and period of notice could not be verified during this audit.</p>
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No.	Yes	<p>The Kempas CU provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to all workers stipulated with Workers Housing Management Procedure. Line site inspection was conducted weekly by the PIOA (inspection by Medical Assistant) and using the Housing Complex/ Nest/ Community Hall Weekly Inspection Checklists. This inspection will be followed up by Estate Welfare Committee using Housing Unit Inspection via three months once. Any issues found during the inspection were noted down in the checklist and action will be taken accordingly.</p>

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Clause	Indicators	Comply Yes/No	Findings
	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.		
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	Yes	All the workers have been 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 mill and estate sundry shop. A visit to the estate's sundry shop had confirmed that the price of the daily needs is reasonable considering the size and location of the grocery store.
	<p>6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following:</p> <ul style="list-style-type: none"> • An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage 	Yes	Kempas CU has followed the MAPA/NUPW Agreement 2019 which is payment of the wages following the Minimum Wages Order 2022. As per current situation in Malaysia, all workers in Kempas CU have been paid by following the Minimum Wages Order 2022. Prevailing wages per months calculations based on SOU basis. The calculated value for Local Workers is RM 1,708.06 and for Migrant Workers RM 2,010.37.

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Clause	Indicators	Comply Yes/No	Findings
	<p>payment.</p> <ul style="list-style-type: none"> 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 Kempas CU.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all	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	<p>Recognition of freedom of association is available in SDPB's Human Rights Charter 2020, which is available in national language. 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 respects 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.</p> <p>a) During the interview with workers, there is no evidence received that there is restriction from the company to allow workers to join trade union.</p> <p>b) The workers have their freedom to join the union.</p>
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	Yes	The Social Dialog was introduced and implemented at Kempas CU to comprise 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 on a forthright basis. This has also been implemented due to impact assessment. Main reason to gather the information such as feedback from the workers in terms of Social, Safety, Environmental, Welfare issues, etc. All feedback was 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	Yes	Interview with workers union representatives (NUPW Chairman & NUPW Secretary) and workers representative from Social Dialogue confirmed that they were independently elected as the NUPW/Social Dialog by all members of NUPW/Social Dialogue among mill

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Clause	Indicators	Comply Yes/No	Findings
such personnel.	associations, or other freely elected representatives for all workers including migrant and contract workers.		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	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director, includes as follows - We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> a) Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. b) Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. c) Ensuring Favorable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations. d) Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the well being of our communities. e) Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognize that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use. f) Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalized groups, persons of different abilities and refugees. g) Protecting the Rights of Children: We seek to promote the well being of children and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	Yes	<p>There was no evidence that the estates and the mill at Kempas CU has employed anyone below the age of 18 years.</p> <ul style="list-style-type: none"> a) Auditor also verified through the contractors in the Kempas CU and confirmed there was no contractor workers below the age of 18 years available in the estate and mill. b) This was verified by examining the master lists, personal file, contracts and payslip of each operating unit where details of the workers' IC numbers and dates of birth are available. c) Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.

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Clause	Indicators	Comply Yes/No	Findings
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	Yes	h) There was no evidence that the estates and the mill at Kempas CU has employed anyone below the age of 18 years. Auditor also verified through the contractors in the Kempas CU and confirmed there was no contractor workers below the age of 18 years available in the estates and mill. This was verified by examining the master lists, personal file, contracts and payslip of each operating unit where details of the workers' IC numbers and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	Yes	The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders.
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 Berhad 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. It was found that the workers were aware of the policy communicated during muster briefing and placed publicly in the notice board at housing area and office. It is also being explained during the induction course for the newly arrived workers. In addition, the policy to prevent sexual and all other forms of harassment and violence was implemented via gender committee.
	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 Berhad 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. It was noted that the workers were aware on the policy communicated during muster briefing and placed publicly in the notice board at housing area and office. It is also being explained during the induction course for the newly arrived workers.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to	Yes	As verified during an on-site interview with relevant stakeholders, management of mill and estates within Kempas CU conducted the assessment in consultation with new mothers and taken actions to address their needs. With regards to Serkam Estate, the new

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Clause	Indicators	Comply Yes/No	Findings
	address the needs that have been identified.		mothers needs were assessed on September 2022.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	Yes	A grievance mechanism which respects anonymity and protects complainants is in place at the CU as per the Sime Darby Gender Committee Handbook 1st Edition 2014. Additionally, SDP has also established Suara Kami. According to the SOP for Suara Kami Helpline in Apr 2022, 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.	<p>6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages <p>However, the foreign workers request the office to keep their passport due to safety reason without any force from Sime Darby SOU Seri Intan Management as verified through 'Consent for Passport Safekeeping'. Foreign workers also are freely to take back their passport after filling in 'Borang Pengambilan Passport'. All the passport is</p>	Yes	<p>Interview with the workers confirmed that no forced and trafficked labor in Kempas CU.</p> <p>a) The terms and conditions offered by the company were similar in their home country and when arrived in the plantations. No contract substitution has occurred. Passports are kept by each worker and no longer kept in the office or passport locker. Overtime was monitored by the company and the workers are given freedom to choose to overtime and resign.</p> <p>b) There was no penalty for termination of employment if they wish to terminate the contract earlier as per the employment contract signed. If the workers in the mill want to work for overtime, they will need to fill in the Overtime Details form. Those who worked on rest day and public holiday is required to fill in the application form. Approval from the Supervisor and Assistant is required.</p>

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Clause	Indicators	Comply Yes/No	Findings
	stored in the safe locker in manager office with name of worker, passport number.		
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	Yes	SDPB has implemented a Sime Darby's Human Rights Charter and can be easily accessed via www.simedarbyplantation.com where they committed as below: a. Providing equal opportunity b. Respecting freedom of association c. Eradicating any form of exploitation d. Ensuring favourable working conditions e. Enhancing Safety and Health 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	All the Estates / Mill Managers were appointed as the Chairman of the ESH committee. The Manager subsequently assigned duties of ESH coordinator to the Assistants or healthcare assistant for the downline implementation of ESH practices in the estates. All identified Executives were officially given a letter for such an appointment. All estates and the mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. The dates of meetings held by estates and mill are properly recorded and reviewed during the audit. Workers during the meeting participated in the discussion mainly online site and safety. All units adopted the agenda as released Group Sustainability Department. This agenda list was sighted and adequate to discuss salient issues relating safety, environmental and health. The agenda as discussed during the meeting among others includes the following; <i>Laporan Pemakaian PPE, Laporan Latihan & SOP, Program OSH / HIRARC, Lawatan DOSH / DOE, Laporan Kemalangan, Laporan Pemeriksaan Tempat Kerja, Laporan Kesihatan & Kawasan Perumahan, Laporan Bahan Buangan Terjadual/Isu Alam Sekitar.</i>
	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	Procedures for accident and emergencies has been established. There is formation of ERP Team & ERP for all the identified incidences. In addition the procedures have been summarized in a chart flow form and displayed for information of all employees in the estate. They includes emergencies relating fire, chemical spillage, flood and accident at work place. a) <i>Ahli J/Kuasa Pasukan Bertindak Kecemasan 2021</i> headed by the Estate/Mill Manager b) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Kebakaran</i>

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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>c) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Banjir</i> d) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Kimia</i> e) <i>Carta Aliran Pelan Tindakan Kecemasan -Covid 19</i></p> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by RSQM and amended to tailor to the situation differences in the estates and mill.</p> <p>ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The training are conducted by an accredited or qualified organization who can demonstrate their suitability to provide training. The trained personnel for the First Aid were among the employees working as field staff/mandores. The first aid boxes were available at various points in the estate office, workshop, and store. The 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 Man day MC.) This is summarized officially in the JKPP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKPP 8 a mandatory requirement with submission as follows. Accident Statistics are being maintained in a satisfactory manner.</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	Training and briefing on the operations were provided for workers to educate them on safe working practices. This is also done to ensure that the applicable precautions are adhered. Training for employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, Mill workers, harvesters, pruners, field workers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. Based on the HIRARC carried out at both estates and the mill the PPE types for the various activities were identified and recommended.
	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	Yes	Both the Estates and Mill in the SOU 17 uses SOCSO for the coverage for the local and foreign workers. The insurance coverage has ceased effective 2018 following the Government directive on the coverage.

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Clause	Indicators	Comply Yes/No	Findings
	accordance with Malaysian law.		
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	Yes	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKPP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKPP 8, a mandatory requirement with submission as follows. Accident Statistics are being maintained in a satisfactory manner.

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	Kempas SOU 17 continued to implement Integrated Pest Management (IPM) in the 4 estates and continued to manage pests, disease and weeds using appropriate IPM techniques guided by the Agricultural Reference Manual (ARM) Section 15 -Plant Protection. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars and rhinoceros beetles. For bagworm control the program includes the planting of beneficial plants such as Cassia cobanensis, Antigonon leptopus and Turnera spices and for rhinoceros beetles is by using pheromone traps. In order to minimize use of pesticides the estates had planted beneficial plants mainly Tunera, Cassia cobanensis and Antigonon leptopus with maps indicating areas planted. All 4 estates carried out census on rat damage and diseases like Ganoderma. The IPM technique to control rats includes rearing barn owls (Tyto alba) and rat baiting was by calendar baiting at 2 campaigns per year. Rat baiting would continue until bait acceptance fell below 20%. The procedure referred was in the Agricultural Reference Manual (ARM) Section 15 – Plant Protection.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	Yes	Species referenced in the Global Invasive Species Database and CABI.org. are not used in managed areas of the 4 estates.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e.	Yes	Kempas SOU 17 continued to use the Sime Darby Plantation Berhad's "Responsible Agriculture Charter" revised in 2020 in which item 3.2. (ix) states "Zero tolerance of the use

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Clause	Indicators	Comply Yes/No	Findings
	where no other effective methods exist, and with prior approval of government authorities.		of fire within our land boundaries and conservation areas, and the establishment of effective monitoring and prevention systems, as well as proactive firefighting measures in and around our operations.”. There was no use of fire for pest control as there had been no pest outbreaks that required burning in all the 4 Estates visited. This was confirmed by staff and workers during interviews.
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	Kempas SOU 17 continued to use agrochemicals based on its Agricultural Reference Manual (ARM) Section 15 and 16, SSOP and Pictorial Safety Standard Book (PSS) where written justifications had been provided for various fields operations. The Manual has included a chemical register list which indicates the use of selective products that are specific to the target pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOP.
	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	Kempas SOU 17 continued to maintain records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients applied per ha. Pesticides are used only when justified. Areas used were recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. All 4 estates had documented programs for spraying pesticides and for rat baiting. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Yes	As part of the IPM plans, the quantity of pesticides required for various field conditions are documented and justified in Sime Darby Plantation Berhad Agriculture Reference Manual (ARM) Section 16.5. The implementation in the field was consistent with the ARM and the following practices were adopted by all 4 estates.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	Yes	There was no evidence of prophylactic use of pesticides in Kempas SOU 17.
	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.	Yes	Kempas SOU 17 only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. The use of paraquat had been banned in all Sime Darby Plantation Berhad estates since Nov 2006. There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions had been used.

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Clause	Indicators	Comply Yes/No	Findings
	The due diligence refers to:		
	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. Hence, the need for judgment of the threat assessment does not apply on the Kempas SOU 17.
	7.2.5b Why there is no other alternative which can be used.	Yes	As mentioned above in 7.2.5 of this check-list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need to check for other alternative does not apply on the Kempas SOU 17.
	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 check-list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need to verify for other less hazardous alternatives does not apply on the Kempas SOU 17.
	7.2.5d What is the process to limit the negative impacts of the application.	Yes	As mentioned above in 7.2.5 of this check-list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need to check for process to limit the negative impacts of the application does not apply on the Kempas SOU 17.
	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 check-list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, Estimation of the timescale of the application and steps taken to limit application to the specific outbreak does not apply on the Kempas SOU 17
	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	Yes	Records verified at time of visit showed that pesticides were handled, used and applied by trained persons and as per the MSDS of the pesticide. a) The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involve and how the

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Clause	Indicators	Comply Yes/No	Findings
	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.		<p>chemicals should be used in a safe manner.</p> <p>b) The trade and generic names of the chemicals were made known to the workers through the MSDS training. It was also noted that MSDS are available at all sites during the audit.</p> <p>c) Training in pesticide handling and spraying technique was carried out by OSH team and by the Assistant Managers. The training included the safety aspects and usage of PPE when handling pesticides. Record of training was available for verification.</p> <p>All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. 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>
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	Yes	<p>The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). Records of purchase, storage and used were maintained.</p> <p>a) All of the stores were equipped with exhaust fans and the door was secured and keys held by only the store keeper and attendant. Only authorized personnel are allowed to handle the chemicals.</p> <p>b) All chemicals were segregated and fertilizers were well stacked. Relevant MSDS/CSDS were available in the stores.</p> <p>c) Empty pesticides containers were triple rinsed, holes punched in them and stored separately in the scheduled wastes store awaiting proper disposal.</p>
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Yes	<p>The procedure - Scheduled Wastes (Hazardous Waste) Management has been established. Empty containers were tripled rinsed, pierced and delivered to a registered recycler company approved by DOE. Visit to waste storage confirmed that empty pesticide containers were collected with proper storage. These items will be punctured and disposed as scheduled waste as the EQA. Content includes the triple rinsing procedures and the relevant training to be conducted.</p>
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	Yes	<p>Aerial spraying was not practiced by all four estates, Tangkah, Kemuning, Serkam and Kempas. There was no evidence to show that any had been carried out. This was also confirmed by interviewed staff and workers.</p>

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Clause	Indicators	Comply Yes/No	Findings																																																		
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Yes	All medical surveillance was conducted by an OHD Doctor of third-party clinic The results for the entire workers, including the pesticide operators, were positive and declared FIT to handle chemical.																																																		
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	Yes	All the estates and mill in the CU complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation whereby; No work with pesticides is given to pregnant or breast-feeding women. <i>Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan</i>) 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	<div>The Estates and Mill had established the waste and pollution management plan 2023 as shown below. The PIC and time frame was also shown in the management plan.</div> <table><tr><th></th><th>Activities</th><th>Source</th><th>Waste /Pollution</th><th>Affected Environment</th></tr><tr><td>1</td><td>Gen store</td><td>Petrol oil, lubricant</td><td>Spillage & contamination</td><td>Land, water</td></tr><tr><td></td><td></td><td>Chemical</td><td></td><td></td></tr><tr><td>2</td><td>SW store</td><td>Scheduled waste</td><td>All type of SW</td><td>Environmental</td></tr><tr><td>3</td><td>office</td><td>Domestic/office waste</td><td>paper plastic</td><td rowspan="3">Land, water</td></tr><tr><td></td><td></td><td>Toilet & kitchen</td><td>Sewage</td></tr><tr><td>4</td><td>Workshop</td><td>Used oil & grease</td><td>Spillage</td></tr><tr><td></td><td></td><td>Metal waste</td><td rowspan="2">Wastage</td><td rowspan="2">Recycled</td></tr><tr><td></td><td></td><td>Oil drum/tank</td></tr><tr><td>5</td><td>Labour line</td><td>Domestic waste</td><td>Solid waste</td><td rowspan="2">Land, water</td></tr><tr><td></td><td></td><td>Toilet/kitchen waste</td><td>Sewage</td></tr></table>		Activities	Source	Waste /Pollution	Affected Environment	1	Gen store	Petrol oil, lubricant	Spillage & contamination	Land, water			Chemical			2	SW store	Scheduled waste	All type of SW	Environmental	3	office	Domestic/office waste	paper plastic	Land, water			Toilet & kitchen	Sewage	4	Workshop	Used oil & grease	Spillage			Metal waste	Wastage	Recycled			Oil drum/tank	5	Labour line	Domestic waste	Solid waste	Land, water			Toilet/kitchen waste	Sewage
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	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	Yes	In Kempas POM and the estates, the Scheduled Wastes (Hazardous Waste) Management has been established. Management and disposal of wastewater 2023 has been established compiled by Assistant Engineer. Waste Management Plan 2023 has been established prepared by QA and verified by the Assistant Engineer in Jan 2023. The management Plan for 2023 has yet to be finalised the source and disposal method of scheduled waste, domestic waste and industrial waste. The chemical handlers were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.																																								
	7.3.3 The unit of certification does not use open fire for waste disposal.	Yes	There was no land preparation in SOU 17 Mill and Estates by burning ever since SDPB practiced zero burning as per the policy in: a) Felling/clearing & land preparation b) Carbon Policy SDPB has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting 2023 in the estate No fire was used for waste disposal.																																								

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Clause	Indicators	Comply Yes/No	Findings
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOP, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	Yes	Kempas 17 SOU practiced the maintenance of long-term soil fertility by annual application of fertilizers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and some EFB and compost application, water management and by maintaining soft weeds within interlines.
	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 by SDPB Chemical Laboratory, R&D Centre, Carey Island 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 monitors the changes in the organic carbon and total nitrogen. For all 4 estates Agronomic assessment and fertiliser recommendation was conducted by Sime Darby Research Bhd. to of formulate the manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar samplings for Ash, N, P, K, Mg, Ca & B, were carried out in all Estates. The latest being: in Apr – July 2022. Soil analysis for PH, Org C, Total N, Total P, Avail P, Exch K, Exch Ca & Exch Mg was carried out on a 5 year cycle basis and last carried out between June – Sept 2018. In addition, a soil sampling was also conducted on 20/06/2019 for Peat Soil Verification over 148.5Ha – concluded as no peat soils in Kempas Estate.
	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 fertilizers.	Yes	All the 4 Estates, Tangkah Estate, Kemuning Estate, Serkam Estate and Kempas continued to have a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose and EFB, compost and POME were also applied. EFB was applied 30 mt/ha in mature and 40 mt/ha in immature oil palm areas. It was applied on the stacked palm fronds in the mature areas while for immature palm was applied in the circles.
	7.4.4 Records of fertilizer inputs are maintained.	Yes	Kempas SOU 17 continued to monitor their fertilizer inputs as recommended by their Chief Agronomist 1, Plant Nutrition & Protection, Central West Region, who visited both estates during the annual foliar sampling carried out as mentioned under Indicator 7.4.2. Fertiliser application program was monitored using records like manuring master plan, program sheets, bin cards, field cost book, manuring audits by Planning and Monitoring Department (PMU) under Upstream Department. Records of programs and applications of fertilisers were made available to auditors.
7.5 Practices minimise and control erosion and	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	Yes	As per the provided soil maps it was observed that no fragile or marginal soils were found in Kempas SOU 17. As per the Soil Maps the soil series were as follows:

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Clause	Indicators	Comply Yes/No	Findings																																																																								
degradation of soils.			<table border="1"> <tr> <td>Tangkah Estate</td><td>Kemuning Estate</td><td>Kempas Estate</td><td>Serkam Estate</td></tr> <tr> <td>Bungor</td><td>Batu Anam</td><td>Bungor</td><td>Bungor</td></tr> <tr> <td>Durian</td><td>Bungor</td><td>Gajah Mati</td><td>Chat</td></tr> <tr> <td>Jerangau</td><td>Bungor/Kedah</td><td>Holyrood</td><td>Gajah Mati</td></tr> <tr> <td>Local Alluvium I</td><td>Durian</td><td>Jeram</td><td>Jerangau</td></tr> <tr> <td>Local Alluvium II</td><td>Gajah Mati</td><td>Kg Kubur</td><td>Local Alluvium</td></tr> <tr> <td>Malacca</td><td>Rengam Shallow</td><td>Local Alluvium I</td><td>Malacca</td></tr> <tr> <td>Rengam</td><td>Local Alluvium</td><td>Munchong</td><td>Masai</td></tr> <tr> <td>Serdang</td><td>Malacca/Jitra</td><td>Organic Clay</td><td>Munchong</td></tr> <tr> <td>Sungai Buloh</td><td>Munchong</td><td>Rengam</td><td>Pohoi</td></tr> <tr> <td>Tampin</td><td>Munchong Shallow</td><td>Serdang</td><td>Rengam</td></tr> <tr> <td>Tavy</td><td>Older Alluvium</td><td>Seremban</td><td>Serdang</td></tr> <tr> <td>-</td><td>Padang Besar</td><td>Tavy</td><td>Unclassified</td></tr> <tr> <td>-</td><td>Prang / Rengam</td><td>-</td><td>-</td></tr> <tr> <td>-</td><td>Rengam Shallow</td><td>-</td><td>-</td></tr> <tr> <td>-</td><td>Sgi Buloh/ Holyrood</td><td>-</td><td>-</td></tr> <tr> <td>-</td><td>Tebok</td><td>-</td><td>-</td></tr> <tr> <td>-</td><td>Unclassified</td><td>-</td><td>-</td></tr> </table> <p>SOU 17 had also prepared slope maps. As per the slope there were no areas above 25°. The Slope maps, dated as follows, were prepared by SBPB, R&D Precision Agriculture Unit.</p>	Tangkah Estate	Kemuning Estate	Kempas Estate	Serkam Estate	Bungor	Batu Anam	Bungor	Bungor	Durian	Bungor	Gajah Mati	Chat	Jerangau	Bungor/Kedah	Holyrood	Gajah Mati	Local Alluvium I	Durian	Jeram	Jerangau	Local Alluvium II	Gajah Mati	Kg Kubur	Local Alluvium	Malacca	Rengam Shallow	Local Alluvium I	Malacca	Rengam	Local Alluvium	Munchong	Masai	Serdang	Malacca/Jitra	Organic Clay	Munchong	Sungai Buloh	Munchong	Rengam	Pohoi	Tampin	Munchong Shallow	Serdang	Rengam	Tavy	Older Alluvium	Seremban	Serdang	-	Padang Besar	Tavy	Unclassified	-	Prang / Rengam	-	-	-	Rengam Shallow	-	-	-	Sgi Buloh/ Holyrood	-	-	-	Tebok	-	-	-	Unclassified	-	-
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	7.5.2 No replanting on steep slopes (above 25 degree) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	Yes	<p>Kempas SOU 17 had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by Group Sustainability & Quality Policy Statement and the protection of slope is stated under SDP's Responsible Agriculture Charter clause 3.1.2</p> <p>It was observed that no replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the SOU. It was also observed that practices to minimise and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines.</p> <p>Cover crop were planted in the replants and in some mature areas. The cover crop <i>Mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>Neprolepis biserrata</i> in the inter rows were sighted during the visit.</p>																																																																								
	7.5.3 There is no new planting of oil palm on steep terrain.	Yes	<p>It was observed that there was no new planting of oil palm on steep terrain. As per the slope maps and field visits there was hardly any terrain of above 25 Degrees.</p>																																																																								

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Clause	Indicators	Comply Yes/No	Findings
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	Yes	Kempas SOU 17, to demonstrate the long-term suitability of land for palm oil cultivation, had conducted soil surveys identifying marginal and fragile soils, and terrain surveys including steep terrain, as mentioned under indicator 7.5.1
	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	Based on the soil maps provided, that were prepared by SDPB R&D, Precision Agriculture Unit there were no marginal and fragile soils on all 4, Tangkah, Kemuning, Kempas and Serkam, Estates.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Yes	As mentioned under Indicator 7.5.1, Tangkah, Kemuning, Kempas and Serkam Estates. had prepared both soil and slope maps to demonstrate the long-term suitability of land for palm oil cultivation. The information from these maps were used by the respective estates in the planning of drainage and irrigation systems, roads and other infrastructure.
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	Yes	This is <i>not applicable</i> as there is no peat soil in all the 4 estates in Kempas SOU 17 as supported by the soil maps of respective estates.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: 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	This is <i>not applicable</i> as there is no peat soil in all the 4 estates in Kempas SOU 17 as supported by the soil maps of respective estates.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	Yes	This is <i>not applicable</i> as there is no peat soil in all the 4 estates in Kempas SOU 17 as supported by the soil maps of respective estates.
	7.7.4 (C) A documented water and ground cover management programme is in place.	Yes	This is <i>not applicable</i> as there is no peat soil in all the 4 estates in Kempas SOU 17 as supported by the soil maps of respective estates.
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability	Yes	This is <i>not applicable</i> as there is no peat soil in all the 4 estates in Kempas SOU 17 as supported by the soil maps of respective estates.

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	<p>Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>		
	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	This is <i>not applicable</i> as there is no peat soil in all the 4 estates in Kempas SOU 17 as supported by the soil maps of respective estates.
	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	Yes	This is <i>not applicable</i> as there is no peat soil in all the 4 estates in Kempas SOU 17 as supported by the soil maps of respective estates.

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Clause	Indicators	Comply Yes/No	Findings																					
	associated audit guidance.																							
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	Yes	<p>SOU 17 Mill /estates had established its Water Management Plan 2023 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <ul style="list-style-type: none">a) Implementation of rain water harvest,b) Construction of water gate and scheduled water pumping for effective management of field drains and field water level.c) daily monitoring of bund / scheduled maintenanced) Establishment of <i>mucuna bracteata</i> to prevent erosion,e) Side drain at field road to control water, frond stacking,f) Enhancement of ground vegetation at bare ground area.g) Monitoring of water usageh) Water consumption and contingency plan during water shortage, dry spell or severe water pollution <table border="1"><thead><tr><th></th><th>Area / Incident</th><th>Action Steps</th></tr></thead><tbody><tr><td>1</td><td>Water Shortage/Dry Spell</td><td>.to purchase water from SAMB to train staff/workers to conserve water</td></tr><tr><td>2</td><td>Severe water pollution/contamination</td><td>water to be purchased from SAMB to perform treatment of polluted water with assistance from SAMB</td></tr><tr><td>3</td><td>Rainwater collection</td><td>Large containers placed at strategic locations Rainwater used for washing vehicles</td></tr><tr><td>4</td><td>Monitoring water usage</td><td>Monitoring water consumption</td></tr><tr><td>5</td><td>Prevent leakages</td><td>Regular checking of pipes and water meters</td></tr><tr><td>6</td><td>Recycle wastewater form washings of spraying pumps, PPE</td><td>Recycle wastewater for chemical mixing/spraying</td></tr></tbody></table> <p>The Estates had implemented water managements plans which covered:</p> <ul style="list-style-type: none">a) Water shortage contingenciesb) Water pollution prevention / Reduce wastagec) Identification & management of waste watersd) Monitoring rainfall / Regular water quality analysis.		Area / Incident	Action Steps	1	Water Shortage/Dry Spell	.to purchase water from SAMB to train staff/workers to conserve water	2	Severe water pollution/contamination	water to be purchased from SAMB to perform treatment of polluted water with assistance from SAMB	3	Rainwater collection	Large containers placed at strategic locations Rainwater used for washing vehicles	4	Monitoring water usage	Monitoring water consumption	5	Prevent leakages	Regular checking of pipes and water meters	6	Recycle wastewater form washings of spraying pumps, PPE	Recycle wastewater for chemical mixing/spraying
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	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Yes	<p>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. The following evidence were checked and verified.</p> <p>It can be concluded that the CU does not restrict access to clean water or contribute to pollution of water used by communities.</p>																					

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	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 Syarikat Air Melaka Berhad (SAMB), Syarikat Air Negeri Sembilan and Syarikat Air Johor (SAJ).																																				
	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	<p>The Estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the Responsible Agriculture Charter (RAC) on Slope Protection Clause 3.1.2 . The buffer zones established are as follows:</p> <table><tr><th></th><th>River width</th><th>Buffer zone</th><th>No</th><th>River width</th><th>Buffer zone</th></tr><tr><td>1</td><td>> 40 meters</td><td>50 meters</td><td>4</td><td>5 - 10 meters</td><td>10 meters</td></tr><tr><td>2</td><td>20 - 40 meters</td><td>40 meters</td><td>5</td><td>< 5 meters</td><td>5 meters</td></tr><tr><td>3</td><td>10 - 20 meters</td><td>20 meters</td><td>-</td><td></td><td>-</td></tr></table> <p>The signboards were displayed accordingly at the site where applicable During the field visit there was no spraying activities or signs left in the visited areas. The buffer zones identified at the estates are as follows:</p> <table><tr><th></th><th>Estate</th><th>Buffer zone area</th></tr><tr><td>1</td><td>Kempas Estate</td><td>Water pond - Eco Retreat</td></tr><tr><td>2</td><td>Kemuning Estate</td><td>Water stream to Sg Tebong 02B</td></tr><tr><td>3</td><td>Tangkah Estate</td><td>P10A Air Panas / Ledang P02A</td></tr></table> <p>Samples are taken from the mill and estates for detection of any pollution arising from the mill and estates activities. Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Extracted record of both the estates with details below; Among others management plan taken:</p> <ul style="list-style-type: none">a) Regular inspection at buffer/HCV areasb) Monitor water from surrounding areasc) Track, measure and report all activities around riverd) Train and educate workers.		River width	Buffer zone	No	River width	Buffer zone	1	> 40 meters	50 meters	4	5 - 10 meters	10 meters	2	20 - 40 meters	40 meters	5	< 5 meters	5 meters	3	10 - 20 meters	20 meters	-		-		Estate	Buffer zone area	1	Kempas Estate	Water pond - Eco Retreat	2	Kemuning Estate	Water stream to Sg Tebong 02B	3	Tangkah Estate	P10A Air Panas / Ledang P02A
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	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	Based on Jadual Pemuatan KPOM disposed effluent on land application via furrow system in Kempas Estate. Sighted quarterly report has been submitted to DOE by quarterly basis. All parameters tested complied with regulatory standards.																																				

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	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	Yes	The mill processing water are obtained from the SAMB and water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis. A slightly higher water usage noted, due to the proportionate reduction in volume of FFB being processed. There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc.																
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	Yes	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2023. The document was reviewed/updated on Jan 2023. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table><tr><td></td><td>Target</td><td>Objective</td><td>Action plan</td></tr><tr><td>1</td><td>Backhoe tractor</td><td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td><td>To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel</td></tr><tr><td>2</td><td>Van / Supervisory vehicle</td><td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td><td>To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.</td></tr><tr><td>3</td><td>Electrical supply</td><td>To reduce reliance on gen-sets for power supply</td><td>Utilization of TNB sources</td></tr></table> <p>There is no opportunity for the estates to capitalize the utilization of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p>		Target	Objective	Action plan	1	Backhoe tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel	2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.	3	Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources
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7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise	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 2022. CU calculated the emission through RSPO Palm GHG (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>Summary of Net GHG Emissions</p> <table><tr><td>Emissions per Product</td><td>tCO2e/tProduct</td></tr><tr><td>CPO</td><td>0.23</td></tr><tr><td>PK</td><td>0.22</td></tr></table>	Emissions per Product	tCO2e/tProduct	CPO	0.23	PK	0.22										
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	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that	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 CU. Hence, RSPO GHG Assessment Procedure for New																																																															

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	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).		Development was not applicable.												
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	Yes	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records which covers estates and mill activities / operation. ‘Pollution Identification Environmental Improvement Action Plan’ is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <table><tr><td></td><td>Environmental Receptors</td><td>Source</td></tr><tr><td>1</td><td>Air</td><td>Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke & gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td></tr><tr><td>2</td><td>Water</td><td>Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down</td></tr><tr><td>3</td><td>Land</td><td>Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.</td></tr></table>		Environmental Receptors	Source	1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke & gases). GHG emission from anaerobic processes (ETP, EFB dumping).	2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	Land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.
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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	<p>There was no land preparation of existence or new planting in SOU 26 and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <p>a) Felling/clearing & land preparation</p> <p>b) Carbon Policy</p> <p>SDP has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for the OP cultivation.</p>												
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	Yes	<p>This is established in the ERP procedure <i>Kertas Kerja Program Simulasi Kebakaran</i>. Therein containing</p> <p>a) Objective</p>												

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			<ul style="list-style-type: none"> b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill <p>The procedure was formalized by GSD / RSQM for use in all operating units in SDP Estates and mills. Training related to fire drill are conducted annually.</p>
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Yes	<p>Both the estates and the mill in SOU 17 held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure <i>Kertas Kerja Program Simulasi Kebakaran</i> dated and Fire Prevention and Control Measure. Therein containing</p> <ul style="list-style-type: none"> a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill <p>All stakeholders being briefed in the respective stakeholders meetings. In addition SDPB extended their zero Burning Policy to their neighbors. Among of fire prevention mechanism has been used by cu such as:</p> <ul style="list-style-type: none"> a) Sime Darby Hotspot monitoring b) Sime Darby Hotspot dashboard c) On the ground fire prevention team d) Fire control team and facilities e) Fire fighting action and simulation activities f) Signboard of fire awareness g) Compliance to RSPO/MSPO requirement including zero burning engagement h) Basic understanding of MSPO/RSPO the no open burning
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	Yes	Auditors has verified through checking 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 CU since 15 November 2018. Hence, this Indicator is not applicable.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as	Yes	Kempas SOU 17 has reviewed their HCV with new assessment conducted on 10-13 February 2014. Report was lodged on April 2015 for the new HCV assessment titled 'HCV

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Clause	Indicators	Comply Yes/No	Findings
managed area are identified and protected or enhanced.	follows:		
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	Yes	Re-Assessment for Strategic Operating Unit (SOU 17 – Kempas) which included both the planted area and relevant wider landscape-level considerations with villages and forest reserved. For Serkam Estate, HCV Re - Assessment has been conducted in April 2017 titled HCV Re-Assessment for Strategic Operating Unit (SOU 18 – Diamond Jubilee). Based on the HCV assessment report, there is only HCV 4 declare in SOU Kempas and total area of HCV area for Kempas SOU 17 CU is 48.69 ha.
	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	The visited estates have maintained their HCV4 which is the Unplantable Area – Steep (Bulumong Div), Rocky Area (Ayer Panas Div) at Tangkah Estate and Natural Pond (Tebong Div), River Reserve (Tebong Div), Water Catchment 3 (Tebong Div), Stream / River reserve (Rumbia Div) and Reservoir (KRU Div) at Kemuning Estate.
	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	Progress of implementation of the action plans i.e. 'Environmental Management Plan FY: 2023 Objectives & Target – for All Estate were reviewed and verified on the ground. The HCV Action Plan integrated in the Environmental 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).
	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	Yes	Not applicable as no local community was identified in HCV areas.

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	reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.		
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	Yes	Although there was no RTE species found in the CU, Kempas SOU 17 still conducted program to regularly educate the workforce about the status of RTE species in Malaysia. HCV and RTE species training were held for all workers and contractors. Sime Darby also established their own disciplinary measures if any of their staff or workers found to capture, harm, collect or kill the RTE species. If found any activities to capture, harm, collect or kill RTE species, the estates will make a report to the 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	SOU 17 Kempas has conducted an on-going monitoring of their HCV4 areas as evidenced by the records in the 'Monitoring of HCV & Conservation Area' files at all Estates. No RTE species were found within the estates area. Noted the CU had continued to implement planned actions such as awareness to the staffs and public on enhancing biodiversity, posting of relevant information in the Sime Darby webpage and erection of signage at strategically locations. All estates have cooperated with Johor Forestry Department, Johor wildlife Department and the Johor State Parks Authority on forest area encroachment and illegal hunting prevention efforts.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	Yes	Not applicable since no new land clearing without prior HCV assessment since November 2005 and or without prior HCV-HCSA assessment since 15 November 2018 where the Remediation and Compensation Procedure (RaCP) applies.

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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 Berhad (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 Berhad (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 to the 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 a change of RSPO reviewer. As of 10/3/2023, 14/19 LUCAs were approved and remaining 4 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 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 requirements. 		
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be		

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		available.		
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.		
<p>5.6.6</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>		No additional indicators	Yes	<p>As it has been mentioned in 4.4.1 of this checklist, evidence of legal ownership of the land including history of land tenure was verified during this audit. For Tangkah Estate the land was previously owned by The Kundong Rubber Estate Limited, Tangkah Rubber Estate Limited and The Kundong Tanjong Pau Limited. The land was acquired during the merger between Golden Hope, Kumpulan Guthrie Berhad and Sime Darby in 2007.</p> <p>The Land Title was then transferred under the name of Sime Darby Plantation Berhad. While Kemuning Estate originated from Sime Darby which was bought from Negeri Sembilan State Government. For Kempas Estate and Mill, originated from Sime Darby which was bought from Melaka State Government. Each estate had legal use of the land through an Ownership signed by the Sultan of Johore and Director of Lands and Surveys of Negeri Sembilan and Melaka.</p>

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ATTACHMENT 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
3.3.2	Minor	<p>Finding: Tangkah Estate - The mechanism to check implementation of PPE procedure was not complied with.</p> <p>Objective evidence - During site inspection at harvesting area, sighted the sampled harvesters did not wear appropriate PPE according to Safe Work Procedure and HIRARC. Sighted 4 harvesters did not wear Wellington Boot during performing their work.</p>	<p>The issue / root cause: Lack of monitoring by estate management of proper PPE usage by harvesters</p> <p>Corrective Action:</p> <ol style="list-style-type: none"> To give briefing to all harvesting mandores on PPE usage and what need to be checked during morning muster or in the field. Briefing by Mandore / Field Staff biweekly on the safety to workers. Organize Safety day" twice a month. Checking by Mandores/ Field Staff every morning as to ensure harvesters are wearing the correct and good condition PPE. To implement and encourage the usage of E-Sime + to report on unsafe act and spot check on PPE usage by Mandore/Field Staff/ Assistant during muster or in the field. To discuss on the workers concern on PPE usage specifically on safety boots, wellington boot, or low cut rubber boot in the next OSH Meeting or Social Dialog Meeting . 	<p>The root cause and the corrective action submitted are acceptable.</p> <p>The action / evidences provided and taken as per the CAR will be checked and verified in the forthcoming audit for closure</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
MAR 01 2022 3.8.5	Major	<p>Requirement: The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard. d) The site shall have documented procedures for receiving and processing certified and non-certified FFBs. <p>Finding: The site do not have updated written procedures to ensure the implementation of applicable supply chain model specified i.e RSPO Supply Chain Certification Standard 2020.</p> <p>Objective evidence: Based on documentation review, Kempas POM had only documented procedure title 'Standard operating procedure for Sustainability Supply Chain and Traceability SD/SDP/PSQM/001', version 2, Issue 5 dated April 2019 instead of procedure of the elements RSPO Supply Chain Certification Standard 2020.</p>	<p>The site has updated written procedures to ensure the implementation of applicable supply chain model specified i.e RSPO Supply Chain Certification Standard 2020.</p> <p>Based on documentation review, Kempas POM had Sustainable Supply Chain and Traceability Procedure, document ID: SD/SDP/GSD/SCCS/0522/01, in line with RSPO Supply Chain Certification Standard 2020.</p>
3.8.6	Major	<p>Requirement: The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b) Effectively implements and maintains the standard requirements within its 	<p>RSPO internal audit was conducted on 9/1/2023 by Mohd Saiful Bari Munir (lead auditor), Amirul Irfan Ainul Azam, Wafa Abdul Aziz, Najwa Mohamad Zahrin and Nur Syahira Mohd Saad. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard</p>

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		<p>organisation.</p> <p>c) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</p> <p>Finding: The site do not have updated written procedure to conduct annual internal audit to determine whether the organization conforms to the RSPO Supply Chain Certification Standard, 2020.</p> <p>Objective evidence: Based on documentation review, Kempas POM had only documented procedure title 'Sime Darby Plantation Internal Audit Procedure Doc ID: SD/SDP/PSQM/IAP dated 1/11/2017 instead of procedure of the elements RSPO Supply Chain Certification Standard 2020.</p>	<p>and the RSPO Market Communications and Claims Documents. There are 4 major and 2 minor were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.</p> <p>Based on documentation review, Kempas POM had Sustainable Supply Chain and Traceability Procedure, document ID: SD/SDP/GSD/SCCS/0522/01, in line with RSPO Supply Chain Certification Standard 2020.</p>
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ATTACHMENT 6 – Timebound Plan

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

No	Management Unit (SOU Name)	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
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		

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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		
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		

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

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		Ulu Remis Estate	-	Johor	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, Johor	Certified	29-Mar-11	
		Sri Pulai Estate	-		Certified		
		Kulai Estate	-		Certified		
		Layang Estate	-		Certified		
		CEP Renggam Estate	-		Certified		
26	Sandakan Bay	Sandakan Bay Oil Mill	-	Sandakan, Sabah	Certified	1-Oct-08	
		Tun Tan Siew Sin Estate	-		Certified		
		Tunku Estate	-		Certified		
		Tigowis Estate	-		Certified		
		Sentosa Estate	-		Certified		
		Segaliud Estate	-		Certified		
27	Melalap	Melalap Oil Mill	-	Tenom, Sabah	Certified	21-Jan-11	
		Melalap Estate	-		Certified		
		Sapong Estate	-		Certified		
28	Binuang	Binuang Oil Mill	-	Kunak, Sabah	Certified	16-Jan-09	
		Binuang Estate	-		Certified		
		Sungang Estate	-		Certified		
		Tingkayu Estate	-		Certified		
		Jeleta Bumi Estate	-		Certified		
29	Giram	Giram Oil Mill	-	Kunak Sabah	Certified	16-Jan-09	
		Giram Estate	-		Certified		
		Mostyn Estate	-		Certified		
30	Merotai	Merotai Oil Mill	-	Tawau, Sabah	Certified	16-Jan-09	
		Merotai Estate	-		Certified		
		Imam Estate	-		Certified		
		Tiger Estate	-		Certified		

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		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		
		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.

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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	Ladang Panjang Mill	-		Muaro Jambi	Certified	9-Jul-12	Only Division 3 is certified

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	Gembira Ria	Ladang Panjang Estate	-		District - Jambi	Certified	9-Jul-12	(1,202 Ha). Total Areas of Division 1 and 2 (1,796.19 ha) HGU still in process.
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		
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		

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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		
		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	Teluk Bakau Mill	-		Indra Giri Hilir	Certified	11-Oct-11	

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	Nusa Sejati	Teluk Bakau Estate	-	District – Riau	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 Tetere Estate Ngalimbiu Estate Mbalisuna Estate Smallholders – West Zone (83) Smallholders – Central Zone (53) Smallholders – MBA East Zone (59) Smallholders – MBE East Zone (37)	NA	Guadalcanal Province, Solomon Islands	Certified	18-Mar-11
2	Milne Bay Estates (MBE)	Hagita Oil Mill Giligili Estate Hagita Estate Waigani Estate Sagarai Estate	NA	Milne Bay Province, Papua New Guinea	Certified	15-Feb-13

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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 (Paddock) 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					