

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.: ES10170012

CLIENT: SIME DARBY PLANTATION BERHAD – SOU 5 SELABA

PARENT COMPANY: SIME DARBY PLANTATION BERHAD

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

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

Certification Mill and Supply		GPS	Location	Location
Unit	Base	Latitude	Longitude	Location
SELABA Strategic	Selaba Oil Mill	3° 59' 20.3'' N	101° 04' 52.6" E	36000 Teluk Intan, Perak
Operating Unit (SOU 5)	Cluny Estate	3° 50' 32.7" N	101° 26' 13.8" E	35800 Slim River, Perak

MAP: See Attachment 1 **AUDIT DATE: DURATION** 20-23/12/2022 12 auditor days **TYPE OF AUDIT:** Annual Surveillance Audit No. 2 **Recertification Audit** STANDARD: MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018 SCOPE OF CERTIFICATION: Production of Sustainable Crude Palm Oil and Palm Kernel Using Mass **Balance Supply Chain Model** VALIDITY OF RSPO CERTIFICATE: 03 March 2021 - 02 March 2026 The following attachments form part of this report: Non-conformity Report(s) List of additional site(s) Report by Audit Team Leader **Acknowledgement by Client's Representative ROZAIMEE BIN AB RAHMAN** Name Name : Shylaja Devi Vasudevan Nair Signature Signature Date 27/03/2023 Date 13/04/2023

SUMMARY OF AUDITS

Stage 2 audit / Recertification audit					
On-site audit date	:	28-31 December 2020		No. of auditor days:	12 auditor days
Audit team	:	Mohd Zulfakar Kai	maruzaman (LA), Ro	zaimee Ab Rahman, Ra	ahayu Zulkifli
No. of major NCR	:	4 3.4.3, 3	.8.7, 7.2.10, 6.2.3		Closing date : 30/3/2021
No. of minor NCR	:	1 3.3.3			
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
		√ √		V	√
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
			V	•	
		Indigenous people	Contractors	Others (Please specif	y)
			V		
Supply base sampled	:	Selaba POM, Clur	ny Estate.		
Changes since the last audit	:	The Certified and planted Ha had been reduced due to Transfer of 1 Supply Base (Bikam Estate) to SOU Seri Intan. Currently only 1 Supply base Remaining which is Cluny Estate			
Justification of audit planning	:	Selaba POM – 6 mandays has been located to cover all RSPO P&C MYNI including 2 mandays for SCCS Cluny Estate – 6 mandays for each estate to cover all relevant RSPO indicator such as verification of safety and health, environment, good agriculture best practices, Social, HCV TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.			
Name of peer reviewer	:	Prof. Emeritus Dr.			
Report approved by	:	Kamini Sooriamoorthy Approval date: 23/04/2021			

	Annual Surveillance Audit 1				
On-site audit date					
Audit team	:			ulfakar Kamaruzaman, I	1
No. of major NCR	÷	- Indicator		ananai Namarazaman, i	Closing date : NA
No. of minor NCR	÷	- Indicator			closing date : tu t
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
_		√ V	V		V
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
		V			V
		Indigenous people	Contractors	Others (Please specif	fy)
		V			
Supply base sampled	:	Cluny Estate.			
Changes since the last audit	:	The Manager of Cluny Estate Mr. Fazlysham Bin Abdul Majid has been transferred out and replaced by Mr. Ikram Bin Mohd Safian. The contact person is now the Senior Manager of Sabrang Estate, Mr. Francis Ng. He replaced the Mill Manager Mr. Mohd Asid Bin Mamat.			
Justification of audit planning		Selaba POM – 3 mandays has been located to cover all RSPO P&C MYNI and 1 mandays for SCCS Cluny Estate – 8 mandays for the estate to cover all relevant RSPO indicator such as			
		verification of safety and health, environment, good agriculture best practices, Social, HCV TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.			
Name of peer reviewer	:	-		•	
Report approved by	:	Kamini Sooriamoort	thy	Approval date: 21	/2/2022

		Annua	l Surveillance Audi	it 2	
On-site audit date	:	20-23/12/2022		No. of auditor days :	12 days
Audit team	:	Rozaimee Ab Rahr	nan, Mohd Zulfakar	Kamaruzaman, Dzulfio	jar Azmi
No. of major NCR	:	1 Indicator	Indicator: 7.12.4		Closing date: 20/03/23
No. of minor NCR	:	0 Indicator	:NA		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
		V		V	$\sqrt{}$
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
		V		V	√
		Indigenous people	Contractor	Others (Please speci	fy)
Supply base sampled	:	Cluny Estate			
Changes since the last audit	:	NA			
Justification of audit planning	:	Selaba POM – 5 mandays has been located to cover all RSPO P&C MYNI and 1 mandays for SCCS Cluny Estate – 6 mandays for the estate to cover all relevant RSPO indicator such as verification of safety and health, environment, good agriculture best practices, Social, HCV TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.			
Name of peer reviewer	reviewer : NA				
Report approved by	:	Kamini Sooriamoor	thy	Approval date :	27/03/2023

Annual Surveillance Audit 3					
		Annuai	Surveillance Audi		
On-site audit date	:			No. of auditor days :	
Audit team :	:				
No. of major NCR	:	Indicator			Closing date :
No. of minor NCR	:	Indicator	:		
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	/)
Supply base sampled :	:				
Changes since the last audit	:				
Justification of audit : planning	:				
Name of peer reviewer :	:	NA			
Report approved by	:			Approval date :	

SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Dec 2020 - Nov 2021	Dec 2021 - Nov 2022	Dec 2022 – Nov 2023		
Certified FFB Processed (MT)	2,075.85	20,325.00	19,383.40		
Production of Certified CPO (MT)	434.06	4,079.23	4,070.51		
Production of Certified PK (MT)	103.79	1,006.09	969.17		
Certified Areas (Ha)	1,549.75	1,549.75	1,549.75		
Certified Areas (ria)	1,549.75	1,549.75	1,549.75		
Planted Areas (Ha)	1,282.00	1,282.00	1,282.00		
Production Areas (Ha)	1,085.28	983.14	1,091.62		
HCV Areas / Conservation Areas (Ha)	6.49	6.49	6.49		
REMARKS	-				

TABLE 2

	PO	PK
*Last years certified volume (MT)	*14,023.78	*3,970.61
Last years actual certified sold (MT)	3,346.27	2,284.94
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	9,425.47	865.04
Last year actual sold CSPO credits (where applicable)	0.00	0.00
New year certified volume (MT)	4,070.51	969.17

^{**}With reference to the extension of volume applied and approved by RSPO in Sept 2022.

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1.0 AUDIT PROCESS

1.1 Certification Body

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

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Rozaimee Ab. Rahman	Lead Auditor Health & Safety, Environment, SCCS	Holds a B. Sc. of Agriculture from UPM. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO.
Mohd Zulfakar Kamaruzaman	Auditor HCV, Social (External)	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor.
Dzulfiqar Azmi	Auditor Social (Internal)	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He has experience in auditing since 2018. He is trained as an RSPO Lead Auditor.

1.3 Audit methodology

The audit covered the Selaba palm oil mill and its one (1) supply base. The sampling methodology applies for supply base with higher than four estates. The sampling shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The sole supply base covered during the audit is Cluny Estate. The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

SIRIM QAS International had sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs). In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below:

Stakeholders interviewed

Evidence from stakeholder consultation

1) Employees / Workers Organizations (local / foreign / Orang Asli workers / male & female)

The following were confirmed during the conduct of audit as there was no evidence to prove otherwise:

- All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in origin laugaunge as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer.
- They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime.
- They have been getting salaries above RM1,500 since May 2022. Salaries were paid before the 7th of every month.
- No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment.
- No discrimination between migrant workers and local workers, between male and female worker.
- Comfortable housing with water and electricity provided by government (Subsidise Electricity).
- OPP System implemented as mechanism to repair house defect.
- Have access to affordable food from the canteen/sundry shops within the estate/mill premises.
- Entitled to free medical facilities at the estate clinic.
- Have representatives who attend regular meetings (Social Dialog & NUPW) with the management where they can put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects.
- They knew the types of work offered at Selaba CU (mill & estates) when they were in their countries of origin.
- All migrant workers keep their own passports.

	 Shuttle services FOC once a month for workers go to nearest town.
	 Monthly recognition for workers i.e. highest harvesting productivity and housing cleanness
	Alternate Sunday/Rest Work
	 Complaint channel via various platform i.e. Suara Kami (Platform by Nestle), Workers Hepline, WMU Careline (From Region), Whistleblowing (HQ).
	 Freedom Decision Movement by worker for medical access and leaving of workplace during rest or public holiday via implemented the Guideline Medical Access Procedure & Guideline of Leaving of Workplace.
2) Settlers	NA
Villagers / Local communities (including women representatives, displaced communities)	Interview with head of village/Chairman of Jawatankuasa Pengurusan Komuniti Kampung (JPKK) from Kg Glouster Batu 6, Kampung Selabak Dalam, Kg. Pekan Trolak, Kg Rasau and Tok Batin from Kg Sungai Bill
4) Suppliers	Auditor has called recruitment agent from Lombok Indonesia and the agent confirmed that the others fee paid to agent by SDP is for recruitment fees e.g. for passport, visa, medical, food, transportation from village and flight ticket, which are not borne by workers. Interview with new workers at Selaba POM and Cluny Estate confirmed these workers also understanding that they need to do all the above to go to Malaysia, and the agent also already explained to them regarding the work they should get in Malaysia which is in oil palm plantation.
5) Contract workers (local / foreign / Orang Asli workers / male & female)	Interviews with foreign contractor workers 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 estate. No abuse at work and force labour occurred for contractor workers. Salary paid via cash payment with payment voucher provided along with detailing as payslip. The workers have been paid the entitlement as per Employment Act 1955 such as work on rest day, public holiday, annual leave, medical leave, etc.
6) Local & national NGOs	NA
o) Local & Hational NGOS	

8) Independent growers / Smallholders	Selected parties interviewed, no issues.	
9) Indigenous people	Tok Batin from Kg Sungai Bill	•
10) Contractor	Selected contractors interviewed, no issues.	*
11) Previous land owner (if any)	NA	•
12) Others (please specify)	NA	

1.5 Audit plan: Refer to Attachment 2

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

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

Selaba POM has a processing capacity of 40 metric tons of FFB per hour. Cluny Estate is the only supply base under SOU Selaba. Selaba POM depends on crop diverted from neighboring CU and outside crop. Cluny Estate has been fully developed before the year of 2005. Hence, there is no New Plantings in Cluny Estate. Selaba CU is also certified with MSPO certification.

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

The FFB sourced from company own estates that are certified and third parties which are not certified. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

Table 1: Actual FFB production by the supply base for the last reporting period (Dec 2021-Nov2022)

(Ocalifical) Fototo	FFB F	Production
(Certified) Estates	Tonnes	Percentage (%)
Diversion	1,077.84	1.69%
Seri Intan	12,428.54	19.53%
Sabrang	5,876.90	9.24%
Sg Wangi	4,317.09	6.78%
Cluny	16,368.64	25.72%
Bikam	9,692.26	15.23%
Flemington	89.56	0.14%
Sg Samak	2,196.18	3.45%
Kinta Kellas	6,975.40	10.96%
Sogomana	4,471.70	7.03%
Sabak Bernam	141.90	0.22%
Total	63,636.01	100%
(Non-certified) Third Parties		
Bagan Pasir	9,240.90	9.32%
Budi Sawit	388.08	0.39%
Felcra Chgkt Jong	1,676.43	1.69%
Green Agro	597.37	0.60%
KPSM	44.79	0.05%

Kuala Perak	2,902.66	2.93%
Ladang Moccis	15,753.91	15.89%
Law & Yap	657.79	0.66%
Liang Pang	8,352.86	8.43%
Macro Sawit	4,077.61	4.11%
Nona Commodities	3,098.15	3.12%
Sawit Berkat	12,481.05	12.59%
Sawit Teluk Baru	19,781.54	19.95%
Setia Station	8,608.36	8.68%
Sinaran Mewah	9,936.03	10.02%
Sykt Chuan Soon	1,543.73	1.56%
Total	99,141.26	100%

Table 2: Projected FFB production by supply base for the next reporting period (Dec 2022-Nov 2023)

CU own estates	FFB Contribution		
	Tonnes	Percentage (%)	
Cluny Estate	19,383.40	100	
Total	19,383.40	100	

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

<u>1-00-0</u>	LI NOT LOLL)	
RSPO Supply Chain Model: Mass Balance	Total (MT)	
FFB Received	162,777.27	
FFB Processed	162,777.27	
Certified FFB Processed	63,636.01	
Non-certified FFB Processed	99,141.26	
Crude Pal	m Oil (CPO)	
Overall CPO Production	31,740.73	
Certified CPO Production	12,771.74	
Certified CPO delivered as RSPO	3,346.27	
Certified CPO delivered as non-RSPO	9,425.47	
Certified CPO delivered under other	0.00	
sustainable schemes	0.00	
Palm K	ernel (PK)	
Overall PK Production	8,137.23	
Certified PK Production	3,149.98	
Certified PK delivered as RSPO	2,284.94	
Certified PK delivered as non-RSPO	865.04	
Certified PK delivered under other sustainable schemes	0.00	
Credits traded through Books and Claim	0.00	

Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period (December 2022-November 2023)

	Total (MT)
Certified FFB Received	19,383.40
Certified FFB Processed	19,383.40
Certified CPO Production	4,070.51
Certified PK Production	969.17

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Cluny Estate	1,282.00	1,549.75
Total	1,282.00	1,549.75

Table 6 Planting profile for Clunny Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1998	1	29.09	29.09	2.27
1999	1	61.37	61.37	4.79
2000	1	190.1	190.1	14.83
2001	2	42.55	42.55	3.32
2005	2	33.18	33.18	2.59
2008	2	53.02	53.02	4.13
2012	2	66.93	66.93	5.22
2013	2	78.46	78.46	6.12
2015	2	98.92	98.92	7.72
2016	2	111.36	111.36	8.69
2017	2	120.67	120.67	9.41
2019	2	205.97	205.97	16.07
2020	2	92.89	92.89	7.24
2022	2	97.49	97.49	7.60
Total		1282	1282	100
Remarks	Immature area: 190.38Ha			

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Francis Ng
Position	:	Senior Manager
Address	:	Sabrang Estate
		36009 Teluk Intan, Perak
		reiak
Phone no.	:	05-6221422 / 019-7129030
Fax no.	:	05-6216834
Email	:	Ldg.sabrang@simedarby.plantation.com

3.0 3.1	AUDIT FINDINGS Changes to certified products in accordance to the production of the previous year None
3.2	Progress and changes in time bound plan (Refer to Attachment 6 for the time bound plan)
i.	Have all the estates under the parent company been certified?
	If no, comments on the organization's compliance with the RSPO partial certification rules :
<u>-</u>	Details issues related to these were covered in the section - RSPO Certifications for Principles
-	& Criteria June 2017, in this report
ii.	Are there any changes to the organization's time bound plan? Yes No
_	If yes, comment in terms of acceptance or non acceptance on the changes in the time-bound plan?
iii.	Are there associated smallholders (including scheme smallholders) in the CU
	If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its Certification?
	If no, please state reasons NA
iv.	Any new acquisition which has replaced primary forests or HCV areas Yes No
3.3	Other changes (e.g. organizational structure, new contact person, addresses, etc.)
	NA
3.4	Status of previous non-conformities * * If not closed, minor non conformity will be upgraded to major non conformity Not closed*
3.5.	Complaint received from stakeholder (if any) No significant complaints from stakeholders were observed

4.0 DETAILS OF NON-CONFORMITY REPORT

4.1 For P&C:

Total no. of minor NCR(s) (details refer to Attachment 3) List: NA

Total no. of major NCR(s) (details refer to Attachment 3) List: 1 7.12.4

4.2 For SC:

Total no. of minor NCR(s) (details refer to Attachment 3)

Total no. of major NCR(s) (details refer to Attachment 3)

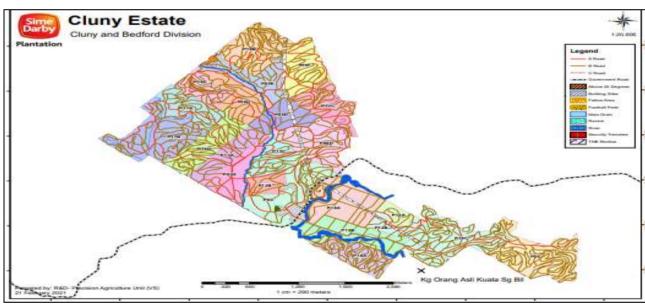
5.0 AUDIT CONCLUSION

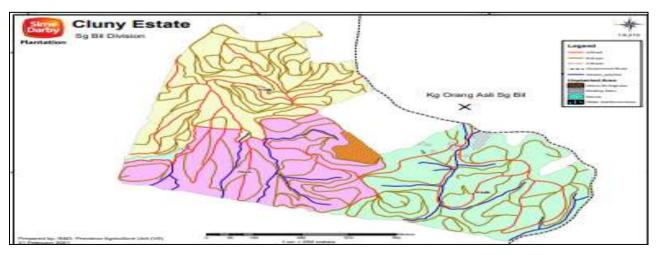
The audit team concludes that the organization has / has not* established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.

6.0	RECOMM	IENDATIO	N			
		No NCR i	recorded. Recommended	to continue certifica	tion.	
			R(s) recorded. Corrective ied out in the next audit.	action plan has bee	en accepted. Verification	of the NCR(s)
			or NCRs raised in the auded to major NCRs .	ıdit which are not ac	ddressed in the subsequ	ent audit shall
			R(s) recorded. Evidence and accepted by the audi			
		Recomme	ended to continue certifica	ation.		
		provided	CR(s) recorded. Evidence but not fully accepted by it within 60 days of the au	the audit team. NCF	R(s) have not bee	n satisfactorily
			ajor NCRs which are no being withdrawn.	t addressed within	a further 60 days shal	ll result in the
7.0	HAVE BI ACTIONS REVIEW	EEN SATIS	THAT ALL CORRECTIV SFACTORILY REVIEWE PROVIDED ON MINOR N ACCEPTED. RECOMME	D, ACCEPTED AND ION CONFORMITIE	VERIFIED AND ALL C S HAVE BEEN SATISF	ORRECTIVE ACTORILY
Audi	t Team Lea	ader :	ROZAIMEE BIN AB RAHI	MAN	July	20/03/2023
			(Name)		(Signature)	(Date)

Attachment 1 - SOU Map & Indigenous People Mapping







Attachment 2 - Audit Plan

RSPO Surveillance Audit Plan ASA2

1. Objectives

The objectives of the audit are as follows:

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

2. Date of assessment : 20-23/12/2022

3. Site of assessment : SOU 5 Selaba Certification Unit

Selaba Palm Oil Mill

Cluny Estate

4. Reference Standard:

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

5. Assessment Team:

Lead Auditor: Rozaimee Bin Ab Rahman (RAR) - GAP, Mill, SCCS, safety, GHG, metric template

Auditor: Mohd Zulfakar Kamaruzaman (MZK) - HCV, social external, environmental

Dzulfiqar Azmi (DA) - social internal

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

6. Audit Method

Site audits including observation of practices, interviews with interested parties (all categories of contractors, employees, nearby population, etc.), documentation evaluation and evaluation of records.

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

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

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

- a) Reporting time frames for economic data are:
 - i. Calendar year (January to December): January 2021 to December 2021, and
 - ii. 12 months period counting up to two months before audit month: October 2021 to September 2022
- b) Reporting time frames for demographic data:
 - i. For mill and estate workers: as of 31 December 2021
 - ii. For smallholders and outgrowers: January 2021 to December 2021
- c) Reporting time frame for all other social and environmental data:
 - i. January 2021 to December 2021

The updated Metrics Template (as attached, the version 2.0) was enforced from 1 August 2021

8. Audit Findings

Audit findings shall be classified as major and/or minor. <u>Major</u> non conformities shall be addressed within <u>90 days</u> 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 <u>five or more major</u> non-compliances <u>within one Principle</u> found during the audit, immediate suspension of RSPO certification shall be recommended.

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

9. Confidentiality Requirements

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

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

10. Working Language: English and Bahasa Malaysia

11. Reporting

(i) Language: English

(ii) Format: Verbal and Written

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

minor NC, 30 days from the last day of this audit.

12. Facilities Required

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

13. Assessment Programme Details : As below

20/12/2022 (Tuesday)

Time		Activities / areas to b	e visited		Auditee
9.00am	Opening Meeting (Selaba POM) – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.				
8.30am	Briefing on the organization background and implementation of RSPO at CU (including actions taken to address previous auditfindings) by company Management Representative. Logistics discussion to the sites to be visited.			n to address previous auditfindings)	Management Representative
9.20am	To assign each audit team members – s	ite and the P&C requirements			
	RAR MZK DA				
	 RSPO Metric Template verification GHG verification Time bound plan and uncertified management units Occupational safety & health practice witness activities at site Interview with workers, safety committee and contractors, supplier, etc Training and skill development programmes Continuous improvement Evaluate effectiveness of training conducted Mill best practices 	Site visit and assessment on impler Social aspects - SIA, manag & implementation, stakehold Interview with local commun contractors, suppliers. Complaints and grievances of stakeholders Inspection of protected sites attributes Forested area, plantation bo adjacent and neighbouring lariparian zone HCV Assessment managem implementation Environmental practice witness activities at oriparian zone SW management Pollution prevention Waste management	ement plan ers. La La Sc pla qu with HCV undary, and use, ent plan & co un Lir co un site Co un co un co un site	te visit and assessment on plementation: ws and regulations ocial aspects - SIA, management an & implementation, workers' arters. terview with employees, gender mmittee, worker representative, ion representative, etc nesite inspection omplaints and grievances	
13.00pm	LUNCH BREAK			All	
14.00pm	Continue assessment Continue assessment Continue assessment		Guide(s) for each auditor		
17.00 - 18.00pm	Audit team discussion / End of Day 1 au	dit			All

Day 2: 21/12/2022 (Wednesday)

Time		Activities / areas to be visited		Auditee
8.00am	Overview of current activities at Selaba POM	Respective Scheme Manager		
8.30am	To assign each audit team members – site and th	Guide(s) for each auditor		
	RAR	MZK	DA	
	Site visit and assessment on Supply Chain Implementation incl. the • Model used • General Chain of Custody • System Requirements for the supply chain • Documented procedures • Purchasing and goods in • Outsourcing activity • Sales and goods out • Processing • Records keeping • Registration • Training • Claims Interview with PIC SCCS, contractors, etc	Site visit and assessment on implementation: Social aspects - SIA, management plan & implementation, stakeholders. Interview with local communities, contractors, suppliers. Complaints and grievances on stakeholders Inspection of protected sites with HCV attributes Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone HCV Assessment management plan & implementation Environmental practice witness activities at site riparian zone SW management Pollution prevention Waste management	 Site visit and assessment on implementation: Laws and regulations Social aspects - SIA, management plan & implementation, workers' quarters. Interview with employees, gender committee, worker representative, union representative, etc Linesite inspection Complaints and grievances 	
13.00pm		LUNCH BREAK		All
14.00pm	To assign each audit team members – site and th	e P&C requirements		Guide(s) for each auditor
17.00 - 18.00pm	Audit team discussion / End of Day 2 audit			All

Day 3:22/12/2022 (Thursday)

Time	Activities / areas to be visited			Auditee	
9.00am	Site : Clunny Estate				
8.30am	To assign each audit team members – site and the P&C requirements				
	RAR	MZK	DA		
9.20am	 RSPO Metric Template verification GHG verification Time bound plan and uncertified management units Occupational safety & health practice witness activities at site Interview with workers, safety committee and contractors, supplier, etc Training and skill development programmes Continuous improvement Evaluate effectiveness of training conducted Estate best practices 	Site visit and assessment on implementation: Social aspects - SIA, management plan & implementation, stakeholders. Interview with local communities, contractors, suppliers. Complaints and grievances on stakeholders Inspection of protected sites with HCV attributes Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone HCV Assessment management plan & implementation Environmental practice witness activities at site riparian zone SW management Pollution prevention Waste management	 Site visit and assessment on implementation: Laws and regulations Social aspects - SIA, management plan & implementation, workers' quarters. Interview with employees, gender committee, worker representative, union representative, etc Linesite inspection Complaints and grievances Gender committee 	Guide(s) for each auditor	
13.00pm		LUNCH BREAK		All	
14.00pm	Continue assessment			All Auditors	
17.00 - 18.00ր	om Audit team discussion / End of Day 3 audit			All	

Day 4:22/12/2022 (Friday)

Time			Auditee				
9.00am	Site : Clunny Estate To assign each audit team members – site and the P&C requirements						
	RAR	MZK	DA				
9.20am	RSPO Metric Template verification GHG verification Time bound plan and uncertified management units Occupational safety & health practice witness activities at site Interview with workers, safety committee and contractors, supplier, etc Training and skill development programmes Continuous improvement Evaluate effectiveness of training conducted Estate best practices	Site visit and assessment on implementation: Social aspects - SIA, management plan & implementation, stakeholders. Interview with local communities, contractors, suppliers. Complaints and grievances on stakeholders Inspection of protected sites with HCV attributes Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone HCV Assessment management plan & implementation Environmental practice witness activities at site riparian zone SW management Pollution prevention Waste management	 Site visit and assessment on implementation: Laws and regulations Social aspects - SIA, management plan & implementation, workers' quarters. Interview with employees, gender committee, worker representative, union representative, etc Linesite inspection Complaints and grievances Gender committee 	Guide(s) for each auditor			
13.00pm		LUNCH BREAK		All			
14.00pm	Verification on outstanding issues for CU Auditor to inform auditee on the required docume Continue Audit Team discussion and preparation	All Auditors					
16.00pm	Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager						
16.30 – 17.30pm	Closing meeting at CU / End of audit		Page 21 of 136	All			

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	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	Selaba POM and Cluny Estate made available documents specified in the RSPO P&C to the public. These documents are either available via the Company's website www.simedarbyplantation.com , or available at the office, or can be accessible at each operating unit.
to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	The CU continued to maintain stakeholders for contractors, vendors/suppliers, government agencies, schools, local communities, etc. It was noted that Sime Darby Plantations has revised their website, www.simedarbyplantation.com to include all management documents relating to the unit's environmental, social and legal issues demonstrating commitment towards compliance to RSPO criteria via Sime Darby Plantation Sustainability Report. The information is provided in Bahasa Malaysia, and some with English translation. This was evidenced from sighting of the documents. The information is usually provided during stakeholder consultation meetings.
participation in decision making.	1.1.3 (C) Records of requests for information and responses are maintained.	YES	The CU had identified personnel responsible for handling complaints. Records of communication were identified and maintained in different files, internal & external communication, depending on the stakeholder. Among the records inspected were correspondences with the authorities, local communities and employees.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	The consultation and communication procedures were documented. External and internal communication procedures developed by Sime Darby Plantation for the estates and mill maintained to be followed and available at the audited sites. In the case of internal communications, records of meetings, briefings and memos were sighted. Notices and posters / pamphlets observed displayed on notice boards at the office and the muster ground were also used as a means of internal communication. Regular morning briefings were used by the management to communicate policies, procedures, rules and regulations and other information to its employees. In the case of external communications, they were mainly in the form of correspondence, which were kept in the External Communication File.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	This updated list contains relevant stakeholders, internal & external, and their contact details such as email and postal addresses, telephone numbers and nominated representatives.

Clause	Indicators	Comply Yes/No	Findings
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	Units within the SOU 5 Selaba subscribe to the Sime Darby Plantations Group's Code of Business Conduct (COBC). This Code applies to all its employees, counterparts, business partners, affiliates and associates. Among the contents of the COBC include avoiding conflict of interest, guarding against bribery and corruption, ethics on gifts and corporate hospitality, donations and sponsorships, dealing with counterparts and business partners, government agencies and public officials. All levels of employees are required to sign a COBC personal pledge.
	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 Group Integrity Governance Assurance Dept; Tender awards to be decided by tender committee to ensure independence and transparency; OPEX tender single source justification, where at least 3 quotations must be obtained for expenses with specified limit.

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	2.1.1 (C) The unit of certification complies with applicable legal requirements.	YES	SOU Selaba has continued to comply with all applicable local, national and ratified international laws and regulations. The last update of legal register was in Sept 2021. Relevant licenses and permits were verified at SOU Selaba.
local, national and ratified international laws and regulations.	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	YES	SOU Selaba have identified, documented and maintained their legal register with written information on legal requirements which related to their operation in legal register entitled "Legal Requirement Register". GSD is responsible to track changes and the information was disseminated to all its plantations and Mill department. The acts and its regulations were evaluated for compliance annually.
	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	In general, the mill and estate boundaries were generally demarcated. Boundary lines were indicated on the maps. The locations of boundary stones were also indicated in the estate maps. This was also verified during the site review.
2.2 All contractors providing operational	2.2.1 A list of contracted parties is maintained.	YES	The list of stakeholders, including the contractors for SOU 5 Selaba is maintained and made available during the audit.

Clause	Indicators	Comply Yes/No	Findings
services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements as verified through Online Vendor Registration (OVR) and the Vendor Code of Business Conduct (VCOBC) which apply to all contractors for due diligence and meeting legal requirements. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, were clearly stated in the contractors' contracts, sighted during the audit. Evidence of legal due diligence was demonstrated when the contractors were required to submit vendor details such as company registration number, directors and shareholders information, track record and copies of their latest audited reports, list of shareholders, company registration certificate, etc.
	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 sampled contracts contain a provision which refers to compliance with Sime Darby's Policies which include its Human Rights Charter Revised 2020 (HRC 2020). Clause 3.2.1 of the HRC 2020 states its respect for rights of workers, by eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking.
2.3 All FFB supplies from outside the unit of certification are from legal sources.	 2.3.1 (C) For all directly sourced FFB, the mill requires: Information on geo-location of FFB origins. Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license 	YES	Selaba POM is currently have the report for the following for the directly source of FFB: a) Information on geo-location of FFB origins. b) Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder c) MPOB License The evidence of the current document is available in the RESPONSIBLE SOURCING GUIDELINE (RSG) BASELINE ASSESSMENT REPORT and Desktop Assessment for New OCP Suppliers for all the directly source FFB also verified by the auditor. Selaba POM also had copy of Valid Land Title and Valid MPOB Licenses for all their Outsider FFB Supplier in File Stakeholder.
	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	Selaba POM is currently have the report for the following for the indirectly source of FFB, as above.

Principle 3: Optimise productivity, efficiency, positive impacts and resilience Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims	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 Selaba SOU continued to make commitment to long-term economic and financial viability. The annual budgets for 2022 to 2026 which included Capital and Operating Expenditures in addition to FFB yield/Ha, OER and CPO were sighted. The budget provisions, which has been reviewed during the audit covered activities for machinery and plant upkeep, expenditure for mature and immature oil palm upkeep, harvesting and evacuation, welfare, capital expenditure and RSPO compliance.
to achieve long-term economic and financial viability.	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	The long-range replanting programme (LRRP) for Cluny Estate, from 2022 until 2026 was sighted. This programme is reviewed once a year and is incorporated in the estate's annual financial budget.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	The management review meetings for SOU Selaba were held at the respective sites. Selaba POM Management Review was held in Dec 2022, while for Cluny Estate, the Management Review was conducted in Sept 2022. The meeting chaired by the Manager was attended by executives and staff. The management had highlighted the positive and negative impact based on internal audit conducted for the POM and estate, respectively.
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	 In consideration to the environmental and social impact, the operating units has established continuous improvement plan. Reviewed the sampled established FY 2022/23 as follows: Palm Oil Mill 1) Redesign conveyor and connecting to the existing Fly Ash Conveyor at the side of boilers. The main objective is to make only 1 area of ash disposal 2) Redesign the layout of ramp area. extend the size of the FFB lorry turning point and having an additional FFB hopper 3) To install insulation soundproof at the ripple mill as to reduce the noise sound into surrounding. Estates 1) To mechanize spraying works to improve productivity and labour shortage 2) To mechanize manuring works using fertiliser spreader to improve productivity and labour shortage 3) Replace old agriculture machineries and vehicles to reduce machineries/vehicle breakdown times. 4) To replace existing earth drain and existing damaged drain to resolve stagnant water issues and blocked drain at linesite area.

Clause	Indicators	Comply Yes/No	Findings
	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 RSPO metrics template is provided in this audit.
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	SOU Selaba continued to use the documents established by the Sime Darby Plantation Bhd. In addition, technical guidelines as listed in the Agricultural Reference Manual were also used. The Manuals are also kept in the administration office to facilitate reference by any interested parties. Site inspection and interview with workers confirmed that the SOP had been implemented and the employees understood the requirements of the SOP. The procedures were communicated to workers through training and infield supervision. Interview with workers showed that the information in the procedures had been effectively communicated.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	Mechanism to check consistent implementation of procedure are as follows: 1- Checking by regional Chief engineer Mill visit, 2- Structured Oil Recovery Assessment (SORA), 3- Structured Estate Performance Assessment Unit (SEPA), 4- Agronomist visit.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	Records of monitoring and the actions taken by the estate continued to be maintained and kept for a minimum of 12 months. Monthly Progress, Monthly Costing and Annual Reports on monitoring of all activities were made available during the audit as well as official monthly reporting to MPOB. Among those records sighted at the estate included the Monthly Chemical consumption, Daily worker's activity, rainfall data, pest census, agrochemicals usage and Programme sheets for Fertiliser Application, Field upkeep, etc
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	YES	There was no new planting in Selaba CU. Environmental Aspect and Impact Assessment (EAI) and Social Impact Assessment (SIA) was conducted internally considering activities associated to estate and mill operations. Thus, this indicator is not applicable.
social and environmental management and monitoring plan is implemented and regularly updated in	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	As mentioned above, the Environmental Aspect and Impact Assessment (EAI) and Social Impact Assessment (SIA) was conducted internally considering activities associated to estate and mill operations. The SEIA was done by Social & Environmental Project Unit, GSD Department. The internal and external stakeholders were consulted during the assessment. The assessments were used methodology of interview workers based on workstation, harvesters, sprayers, worker representatives/NUPW, gender committee, contractor,

Clause	Indicators	Comply Yes/No	Findings
ongoing operations.			supplier, local community, neighbouring estate/smallholders, government agencies, school, etc.
	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 management action plans are being reviewed and updated on an annual basis at Selaba CU. This takes into account inputs from external stakeholder meetings, Social Dialog, NUPW meetings, OSH Committee meetings, as well as Women & Children Committee meetings. Among the social issues for management and monitoring were COVID 19 issues, vaccine programme, overtime issues, replanting activities, school issues, canteen prices, safety issues related to heavy machineries passing by the workers' housing, making sure PPE replacement is always available, replacement of old workers' housing, and documentation legalisation of foreign workers'. The SIA review process had included stakeholders' consultation with regards to social issues. The reviews done had involved respective Managers, Assistants and Sustainability Team with external stakeholders such as from Govt. agencies, neighbouring estates, local communities, suppliers and contractors.
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	YES	The recruitment process was clearly stated in the procedure where the recruitment was based on age, medical fitness and etc. There is no discrimination based on religion, gender, nationality etc., during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. Meanwhile, promotion process i available for the local & foreign workers in the amended procedures under "Title: Career Progression for Workers Level". It has been noted that the workers interviewed understand the above mentioned procedure.
	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. The latest recruitment of workers in Selaba Palm Oil Mill. Foreign workers managed by Workforce Management Unit (WMU). Auditor has called recruitment agent from Indonesia and confirmed all charge was borne by SDP as per agreement. workers also understanding that they need to do all the above to go to Malaysia, and the agent also already explained to them regarding the work they should get in Malaysia which is in oil palm plantation.
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	All routine activities for mill and estate were adequately risked assessed. Appropriate risk control measures had been determined and implemented for the respective activities and operation in the mill and estate. As for mitigation, all the moving parts and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative control was sighted with safety signages displayed at all workstations including mill office and workshop. On overall performance, OSH administrative controls implementation as well as appropriate risk control measures were identified, and a PIC was assigned to monitor the implementation

Clause	Indicators	Comply Yes/No	Findings
			of the control measures during field and site assessment.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is 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.
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 programmes for 2022 that covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs were presented to auditors by both Cluny Estate and mill. The training programmes were also extended to contractors and suppliers. Training courses were either conducted internally by its own staff or by other department within the Sime Darby Group or consultant.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	Records of training are maintained and 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	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS has been communicated to all stakeholder and workers in Sept 2022 by Group Sustainability Department (GSD). Attendance list & photograph was seen.

SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No		Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	NA	Not applicable since Selaba M	ill is MB
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	both certified and non- certified downgrading procedure. List of certified supply base Bikam Estate Cluny Estate Seri Intan Estate (Selaba Division)	e MB model for their supply chain system. SPOM obtained certified FFB d supply base (sample as listed below). SPOM also found to be aware of List of non- certified supply base 13 out growers / smallholders
			Details as in Table 3 of this re	port.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
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	This has been made available, as in Table 4 of this report.
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	YES	Member Name Member Name: Selaba Oil Mill Website: Holding Name: SIME DARBY PLANTATION BERHAD Commodity: Palm Oil RSPO Membership Number: 1-0008-04-000-00 Type of Business: Oil mill License Status: Active (03-03-2022 - 02-03-2023) Supply Chain Model: Mass Balance
3.8.5	The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: Complete and up to date procedures covering the	YES	Selaba POM had revised their documented procedure title "Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia", effective 1 June 2022. The procedure was kept in file Supply Chain. Appropriate changes were also made in the change to include the new clause Production of ISCC certified Waste/Residue Materials at the Mill. There is no evidence that Selaba POM seeking certification outsources activities to independent third parties. Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard has been communicated to all stakeholder and workers by GSD. The Assistant Engineer has overall responsibility and authority over the implementation of RSPO supply chain requirement in RSPO Selaba POM. Selaba POM had continued to implement the procedures it had on receiving and processing of RSPO certified and non-certified FFBs. It has described how SPOM manages the FFB from certified source. No issue regarding receiving Non-certified FFB as this mill is a MB Mill.

Ref. in	Indicators	Comply	Findings
RSPO SCCS		Yes/No	i munigs
	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.		

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.6	The site shall have a written procedure to conduct annual internal audit to determine whether the organisation; • Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. • Effectively implements and maintains the standard requirements within its organisation. • Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.	YES	As describe under para 18.0 SOP for Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia, SPOM refer to this procedure which is follow the RSPO Supply Chain Certification Standard Revision 2020 requirements. Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2020 requirements. RSPO internal audit was conducted in Sept 2022 by the appointed internal auditor. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard. There is 1 NCR raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor. Selaba POM has taken necessary action to improve the comments and NCR from auditor. Documented procedure has defined management review will be conducted once a year Management review meeting has been conducted in Dec 2022 (combine RSPO, RSPO SCCS and MSPO) Internal audit – 1 NCR (SCCS only) Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result achieved. Previous meeting – was highlighted Changes – There were no significant changes. Recommendation for improvement – improve the established system
3.8.7	The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified	YES	Selaba POM Has follow the Sime Darby SOP namely title ''Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia", effective 1 Jun 2022. in Clause7.0 ~ Receiving FFB at the mill. The established procedure has addressed the following: • The name and address of the seller/buyer;

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	FFBs received. The site shall inform the CB immediately if there is a projected overproduction of certified tonnage. The site shall have a mechanism in place for handling nonconforming oil palm products and/or documents.		 Product(s) identification including the applicable supply chain models (mass balance, segregation); The quantity of the products delivered; The loading or delivery date; Related transportation documentation with a unique identification number; RSPO / MSPO certificate number; and MSPO certificate validity. Samples of transactions were taken and all the above were reviewed accordingly.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.8	Sales and Goods Out	YES	The procedure in handling the sales and delivery was sighted and found adequate. Sales activities are usually handled by Sime Darby Plantations Berhad and Global Trade Marketing Department (HQ) on behalf of Selaba POM. Documented procedures related to sales and goods out were sighted and found adequate.
	The supplying mill shall		
	ensure that the following		
	minimum information for		
	RSPO certified products is		
	made available in document		
	form. The information shall		
	be complete and can be		
	presented either on a single-		
	documents or across a range		
	of documents issued for		
	RSPO certified oil palm		
	products (for example,		
	delivery notes, shipping		
	documentation and		
	specification documentation):		
	a) The name and		
	address of buyer;		
	 b) The name and address of the seller 		
	c) The leading or		
	shipment/delivery date;		
	d) The date on which the		
	documents were issued;		
	e) RSPO certificate number;		
	f) A description of the		
	product, including the		
	applicable supply chain		
	model (IP or MB or the		
	approved abbreviations);		
	g) The quantity of the		
	products delivered;		
	h) Any related transport		
	documentation		
	i) A unique identification		
	number		

Ref. in	Indicators	Comply	Findings
RSPO SCCS		Yes/No	_
3.8.9	Outsourcing Activities (i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification. (ii) The mill shall ensure the following: a) The mill 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.	YES	There is 1 outsource company CPO transporter and, the agreement document was available and communication on the RSPO supply chain requirement was communicated to them. Record of training for transport contractor was sighted by the auditor.
	c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 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,		

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 people for both transporters was made available and up-to-date in the stakeholder list.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	YES	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	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 3 years as per Standard operating procedure for Sustainability Supply Chain and Traceability - Controls of documents & records.
	iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	YES	NA- since SPOM using MB model

Ref. in		Comply	-
RSPO SCCS	Indicators	Yes/No	Findings
RSPU SUCS	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)	YES	Selaba POM has maintained the Real Time basis accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record titled as "RSPO Records for Oil Mills".
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	YES	SPOM process all the received certified and noncertified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER). OER & KER has been updated by daily basis and monthly summary has been used as guidance.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.14	consistently. Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	YES	
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from noncertified oil palm products, including during transport and storage to strive for 100% separation.	YES	Not Applicable since this mill is MB Mill
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform	YES	Documented procedures related to sales and goods out were sighted and found adequate. The requirement of sales & goods out especially on notation of applicable Supply Chain model & Certificate number being complied by indicating in weighbridge dispatch ticket.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	YES	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Selaba POM 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 exists in Sime Darby Plantation's Human Rights Charter Revised 2020 (HRC 2020). The scope of this HRC 2020 encompasses workers (men, women, migrant, trans-migrant, contract and casual), employees (all levels of the organisation) and parties and communities surrounding SDP operations. The commitments under the HRC 2020 include engaging and empowering local communities, respect and uphold labour rights, respect and uphold children's rights, protection of human rights defenders, whistle blowers, complainants, and community spokespersons. Among others, the HRC 2020 is states the Company's commitment to safeguarding the confidentiality of those involved.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	Based on documentation reviewed, interviews conducted, and observations made, there is no evidence of any instigation of violence or use of any form of harassment within the certification unit.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all	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	YES	The system used by SOU Selaba in resolving disputes and grievances exists in the procedure called "Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", and "Procedures for handling Social Issues". Selaba POM and Cluny Estate each has its own Internal Complaint Book and External Communication Book. Under Sime Darby's Policy on the Protection of Human Rights Defenders specifically provides for the protection of HRDs with the main objective of ensuring our internal mechanisms prevent harm, protect, and respond to complaints made by HRDs. Clause 3.3 of the Policy states that HRDs and individuals acting in good faith to exercise their fundamental human rights, in the course of their engagement with SDP shall be protected from violence, threats and all forms of retaliation.

Clause	Indicators	Comply Yes/No	Findings
affected parties.	and follows the RSPO policy on respect for HRD.		Anonymity of complainants and whistleblowers are ensured under the Sime Darby Code of Business Conduct which provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ.
	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 POM, Cluny 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	There is evidence that parties to a grievance are kept informed of the progress of the complaints. This was communicated to external stakeholders (e.g. contractors suppliers) during yearly townhall meeting.
	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	It is evident that the conflict resolution mechanism includes options to access independent legal and technical advice.
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	The main contribution to community development for both Selaba POM and Cluny Estate is the employment opportunities accorded to the surrounding communities, including the indigenous peoples, the Orang Asli. At Cluny Estate, about 41% of the Malaysian employees are from the Orang Asli community.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free,	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	YES	Evidence of legal ownership of the land including history of land tenure was verified during this audit. The land was previously owned by Golden Hope and after merged with Sime Darby, The Land Title was transferred under the name of Sime Darby Plantation Berhad. Each estate had legal use of the land through an Ownership and Country Lease signed by the Director of Lands and Surveys of Perak following the payment of premium and Land fee.

Clause	Indicators	Comply Yes/No	Findings
prior and informed	actual legal or customary use of the		
consent.	land are available.		
	4.4.2 Copies of documents	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU
	evidencing agreement-making		Selaba since 1985. The audit team had confirmed that there were no land issues related to
	processes and negotiated agreements detailing the FPIC		previous owners.
	process are available and include:		
	4.4.2a Evidence that a plan has been	YES	
	developed through consultation and	0	
	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	YES	
	certification has respected		
	communities' decisions to give or		
	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	YES	
	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.		
	lease on the land.		

Clause	Indicators	Comply Yes/No	Findings
	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 has been legitimately owned by SOU Selaba since 1985. All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara, and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	
	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	
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	
4.5 No new plantings are established on local peoples' land where it can be	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 5 Selaba and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by SOU Selaba. The audit team had confirmed that there were no land issues related to previous owners and it was confirmed through interviewed with head of village/Chairman of the relevant local communities.
demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system	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	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Selaba. 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.

Clause	Indicators	Comply Yes/No	Findings
that enables these and other stakeholders to express their views through their own representative institutions.	institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and twoway process of consultation and negotiation.		
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are noncoercive and entered into voluntarily and carried out prior to new operations.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Selaba. 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. The audit team had confirmed that there were no land issues related to previous owners and it was confirmed through interviewed with head of village/Chairman of the relevant local communities.
	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. 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,	YES	

Clause	Indicators	Comply Yes/No	Findings
	environmental and social implications of the proposed operations on their lands.		
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by SOU Selaba. 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. The audit team had confirmed that there were no land issues related to previous owners and it was confirmed through interviewed with head of village/Chairman of the relevant local communities.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	YES	No new lands acquired after 15 Nov 2018.
Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System, entitled "Procedures for Handling Boundaries Disputes". In accordance with the Procedures for Handling Boundaries Disputes, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Sime Darby Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	In accordance with the 'Tatacara Perundingan Dalam Menangani Rungutan Dan Aduan", the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at mill and visited estates.
montanono.	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 Selaba SOU.

Clause	Indicators	Comply Yes/No	Findings
	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	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".
demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	YES	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighbouring estate.
relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	It has been verified that the land is legitimately owned by SOU Selaba and all the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	YES	It has been verified that the land is legitimately owned by SOU Selaba and all the related documentation regarding the land acquisition was kept in Sime Darby HQ Office, Ara Damansara and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes are	YES	There was no land encumbered by customary rights or dispute from any stakeholder at SOU Selaba. Land conflict was not present.

Clause	Indicators	Comply Yes/No	Findings
	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.	\/50	
	4.8.3 Where there is evidence of	YES	There was no land encumbered by customary rights or dispute from any stakeholder at SOU
	acquisition through dispossession or		Selaba.
	forced abandonment of customary		
	and user rights prior to the current		
	operations and there remain parties		
	with demonstrable customary and		
	land use rights, these claims will be		
	settled using the relevant reqs.		
	4.8.4 For any conflict or dispute over	YES	
	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).		

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	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	YES	Current and past prices paid for FFB were displayed at the weighbridge counter. Small holders agree with price because the price is followed by the guidelines by MPOB. The Guideline for Price is printed from MPOB web site.
fairly and transparently with all smallholders	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	Sighted evidence training regarding price mechanism to the Outside Crop Producer (OCP) and it was evident that they understood the price due to POM followed the MPOB price every week/month.

Clause	Indicators	Comply Yes/No	Findings
(Independent and Scheme) and other local businesses.	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	Fair pricing, including premium pricing, is agreed with smallholders. Small holders agree with price because the price is followed by the MPOB Pricing Mechanism. The Guideline for Price is printed from MPOB web site.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	YES	
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	Interviews conducted with contractors and suppliers, confirmed that there was no contract for outsider FFB but only terms and agreement about payments. They confirmed the fairness of the terms of their agreement, and payments are made 3 times which is advance payment on 1-10, 11-20 and the final payment were based on MPOB Guidelines OER and KER usually received within 7 to 10 days of invoice issuance end of the month. Fresh Fruit Bunches are supplied from SDPB owned estates which are certified to RSPO and outsider Crop.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	Interviews conducted with contractors and suppliers, confirmed payments were made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	the weighbridge has been calibrated in yearly basis using Metrology Corporation Malaysia Sdn Bhd.
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and	YES	Sime Darby Plantation 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. SOU Selaba has invited the nearby smallholder Outside Crop Producer (OCP) to training and meeting regarding MSPO and RSPO and has encouraged the smallholder to certify with RSPO.

Clause	Indicators	Comply Yes/No	Findings
	sells the certified material.		
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	YES	A grievance mechanism which respects anonymity and protects complainants is in place at the SOU Selaba and the procedures have been communicated to all levels of workforce and to all contractors. As at to date there is no complaint by stakeholder.
The unit of certification supports improved livelihoods of smallholders and their inclusion in	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	YES	Sime Darby Plantation supports Independent Smallholders including women or other partners in their supply base with certification. Contact was made to assess their needs to improve their livelihoods and interest in RSPO certification.
sustainable palm oil value chains.	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	YES	Sime Darby Plantation supports Independent Smallholders including women or other partners in their supply base with certification and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organizational and managerial competencies, and specific elements of RSPO certification.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	Sime Darby SOU Selaba has encouraged the smallholder to certify with RSPO and provides support to smallholders to promote legality of FFB production, but smallholder don't want to join due to financial constraint.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	It was evident that the unit of certification trained Scheme Smallholders on pesticide handling.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	SOU Selaba regularly review reports on the progress of any smallholder who want to join the RSPO.

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. 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. The interview session was conducted with local and foreign workers, and it was found that the workers were aware on the policy communicated during muster briefing and placed publicly in the notice board at housing area and office. It is also being explained during the induction course for the newly arrived workers.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Apart from the indicator 6.1.1 policy which states that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees. As confirmed by the workers during interviews and field observation, payment of wages/salaries, provision of housing and access to benefits and amenities is fair based on observation, review of pay checks, contracts of employment, including charging of recruitment fees for migrant workers.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	YES	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 discrimination based on religion, gender, nationality etc., during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessities etc. This was confirmed during stakeholder's consultation, worker's interview, complaint book and trade union meeting. Sighted the job description of each worker mentions the same regardless of skin colour, religion, race or caste.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	YES	Based on interviews with female workers, Estate Medical Assistant, there was no evidence that pregnancy tests are being conducted as a discriminatory measure. Should a worker whose job comes into contact with chemicals, e.g., sprayers, or lab assistants become pregnant, she would immediately be reassigned to an alternative job employment that doesn't involve contact with chemicals.

Clause	Indicators	Comply Yes/No	Findings
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organization and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly. SDPB has introduced the new Terms of Reference (TOR) for Gender Representatives and Gender Committee, dated March 2021 which supersedes the previous Gender Committees Gender Committee Handbook, First Edition 2014. In this new TOR, more definitive roles, and responsibilities as well as governance structure and programs were added in. The 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.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	The equal opportunities policy is contained within the the policy of Group Sustainability and Quality Policy Statement, which states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Policy of Group Sustainability and Quality Policy Statement was displayed on notice boards in both Bahasa Malaysia and English.
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 Selaba CU documentation of pay is in the form of monthly pay slips. Conditions of pay are contained in the workers' respective employment contracts. Labour laws, union and/or other collective agreements detailing payments and other conditions, was made available in the languages understood by the workers and explained to them by a management during induction. Each pay slip documents the name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions (statutory such as EPF, SOCSO, EIS, electricity), net salary, annual leave and medical leave taken, etc. Samples of payslips (September 2022, October 2022 and November 2022) for samples worker were sighted and verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages Order 2022.
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	YES	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. This includes those who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay. Also confirmed via sampled payslips that wages were paid in compliance with national legal requirements. Salary deductions and overtime were in accordance with the relevant laws (SOCSO, EPF, EIS) and Labour Office permits. None of the sampled workers had any family members performing work.

Clause	Indicators	Comply Yes/No	Findings
	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	On regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements - The working hours as per 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. Permits from the Department of Labour, were also sighted and the 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.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	YES	The Selaba CU provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to all workers stipulated with Workers Housing Management Procedure. Linesite inspection was conducted weekly by the PIOA (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.
	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 estate sundry shop.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.	YES	Selaba CU has followed the MAPA/NUPW Agreement 2019 which is payment of the wages following the Minimum Wages Order Amendment 2022. As per current situation in Malaysia, all workers in Selaba CU have been paid by following the Minimum Wages Order Amendment 2022. Prevailing wages per months calculations based on SOU basis. The total received per months for Local Workers is RM 1,988.94 and for Migrant Workers RM 2,036.90.
	PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place.		

Clause	Indicators	Comply Yes/No	Findings
	The implementation plan with specific targets, and a phased implementation process will be in place, including the following: • An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. • The unit of certification may choose to implement the "living wage" payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation Until such time where the Malaysian version of "decent living wage" has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.		
	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 Selaba CU.
6.3 The unit of certification respects the rights of all	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa	YES	Recognition of freedom of association is available in SDP's Human Rights Charter 2020. Paragraph 3.2.4 states commitment to respect freedom of association, respecting the rights of employees to form and join unions and bargain collectively. Company 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.

Clause	Indicators	Comply Yes/No	Findings
personnel to form and join trade unions of their choice and to bargain collectively.	Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.		During the interview with workers, there is no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join the union.
Where the right to freedom of association and collective bargaining are restricted under law,	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 National Union Plantation Workers (NUPW) is the union that represents workers of Selaba CU. Union membership is open to both local and foreign workers and the workers' representative elected by the NUPW/MAPA itself, which is an independent party. Minutes of meetings were available for review.
the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	YES	Interview with workers union representatives (NUPW Chairman & NUPW Secretary) and workers representative from Social Dialog confirmed that they were independently elected as the NUPW/Social Dialog by all members of NUPW/Social Dialog among mill and estates workers via an election without interference by the management.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	YES	The Group Sustainability & Quality Policy Statement includes the required to address this indicator. Verification of workers master list confirmed that there is no child labour hired. For contractors, the abolishment of child labour & protecting the rights of children available in the Vendor COBC clause 5.8, Human Rights Charter-protecting the rights of children.
	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. 6.4.3 (C) Young persons may be employed	YES	There was no evidence that the estate and the mill at Selaba CU has employed anyone below the age of 18 years. Auditor also verified through the contractors in the Selaba CU and confirmed there was no contractor workers below the age of 18 years available in the estate and mill. This was verified by examining the master lists, personal file, contracts and payslip of each operating unit where details of the workers' IC numbers and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.
	only for non- hazardous work, with protective restrictions in place for that work.		
	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	YES	The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders.

Clause	Indicators	Comply Yes/No	Findings
	supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.		
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	Sime Darby Plantation has developed Human Rights Charter where they create a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. The interview session was conducted with local and foreign workers, and it was found that the workers were aware on the policy communicated during muster briefing and placed publicly in the notice board at housing area and office. It is also being explained during the induction course for the newly arrived workers.
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	YES	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They facilitate opportunities for advancement for their employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The interview session was conducted with local and foreign workers, and it was found that the workers were aware on the policy communicated during muster briefing and placed publicly in the notice board at housing area and office. It is also being explained during the induction course for the newly arrived workers.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	As verified during on-site interview with relevant stakeholders, management of mill and estates within SOU 5 conducted the assessment in consultation with new mothers and taken actions to address their needs.
	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, an alternative independent third-party worker grievance channel with multi-languages and multi-interfaces (toll-free number, SMS and facebook) that assures worker confidentiality unless personal details are required, where in such situations, consent will be sought by the system receiver.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: Retention of identity documents or passports (except for administration purposes including legalisation and	YES	Sighted also evidence that Workers Agent agreement with Sime Darby Plantation was established zero fee charge. Interviewed with India and Indonesia workers also they understand, and they satisfied with them. During the audit period, there are only Indonesian workers recruitments was carried out. Interviews with the workers confirmed that no forced and trafficked labor in Selaba CU. The new Indonesian workers informed that they did not pay any recruitment fee to agent

Clause	Indicators	Comply Yes/No	Findings
	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		as they employed directly by Sime Darby. 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. 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 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.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	SDP has implemented a Sime Darby's Human Rights Charter and can be easily access via www.simedarbyplantation.com 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	The Mill Manager & Estate Manager was appointed as the Chairman for the ESH committee for the mill and estate, respectively. The appointment letters were issued by the Regional CEO. The Managers then appointed the Assistant Managers as Vice chairman & as secretary, with appropriate management and workers' representatives. The management conduct regular two-way communication with their employees through the quarterly ESH meeting. The meetings were evident, and minutes were reviewed accordingly. During the meetings, workers participated in the discussion mainly online site and safety.
			The estate had adopted the new guidelines on the agenda as introduced by regional sustainability unit. This agenda list was sighted and adequate to discuss salient issues relating safety, environmental and health. Also included is the safety programs, workplace inspection review and accident incidences review. The agenda as discussed during the meeting among others includes the following; a) Lapuran Pemakaian PPE b) Lapuran Latlhan & SOP

Clause	Indicators	Comply Yes/No	Findings
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed. 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	YES	c) Lapuran Kemalangan d) Lapuran Pemeriksaan Tempat Kerja e) Lapuran Kesihatan & Kawasan Perumahan f) Lapuran Bahan Buangan Terjadual/Isu Alam Sekitar Accident and emergency procedures are available in adherence to the SPSB policy on 'Crisis Management & Emergency Response' plan of PQMS, OSH manual and "Accident and Reporting and Investigation Procedure', in the same manual. The estate and mill had established procedures for accidents and emergencies situations based on guidelines provided by certification & compliance unit department and amended to suit the various situations in the estate and mill. The procedure was available in both Bahasa and English. ERP Teams & ERP for all the identified incidences were available. The organizational charts for each established ERP team were displayed on notice boards at the offices, line sites, muster grounds & etc, for the information of the employees. Important telephone contact numbers of the Police Station, Fire Brigade, Immigration Department, Hospitals etc were also provided therein. In addition the procedures have been summarised in a chart flow form and displayed for information of all employees. Trainings were also given accordingly to ensure competency. All workers involved in potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting were provided with appropriate PPE and replaced when damaged. The PPE issue and replacements records were verified by the auditors. From interviews conducted with workers and staff in the field and stores clerks it was established that they had been trained and were aware of safe handling procedures. Sanitation facilities for spraying and manuring operator were available at the store area with facilities such as shower room, washing machine, PPE rack, soap, etc. All the workers are understood and aware related to SOP after chemical application.
	of PPE, wash and put on their personal clothing. 6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	YES	All workers had been provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law. All Local and Foreign workers were covered by SOCSO.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Records of all accidents are kept and filed in the Mill and Estate for a minimum period of 10 years. All occupational injuries were recorded using LTA (Lost Time Accident). Cases if any are reviewed during safety meetings. The incidences were summarized in the mandatory JKKP 6, JKKP 7 & JKKP 8 forms.

Clause	Indicators	Comply Yes/No	Findings
			For POM, the JKKP 8 form sent to DOSH on 24/01/2022, while for Cluny Estate, the JKKP 8 form sent to DOSH on 06/01/2022.

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	It had been the practice that insecticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section 15 -Plant Protection and that no prophylactic use of such pesticides would be permitted. Barn owls was encouraged, as were introduced in Cluny Estate. As part of the IPM plans, the management of the estate had established beneficial plants (Cassia cobanensis, Antigonan leptopus, and Turnera subulata) nurseries for continuous planting in order to attract natural predators and thus reducing the use of insecticides. EFB applied at replants was applied in single layers and is not dumped in large amounts to prevent breeding of Rhinoceros Beetles. However, in replants prophylactic spraying using diluted cypermethrin for immature palms in zero burning of oil palm to oil palm replanting was carried out against Rhinoceros Beetles as per SOP.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	There was evidence that species referenced in the Global Invasive Species Database and CABI.org are to be used in managed areas, as per site visited and document review. Management has recorded in the document integrated pest management (IPM) invasive species record. Among of invasive species has been introduce as per CABI.org were Tyto Alba. It has been brought to the estate to control rats' population. However, the species was not harmful to the local species and spread quickly. As per current status in Malaysia barn owls has been accepted and has been used for control pest in plantation even in township areas.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	YES	Selaba SOU continued to use the Sime Darby Plantation Berhad's policy of no open burning. As advocated, the Estate practised Zero burning. Thus, there was no use of fire for pest control. In the 2022 replants visited during the audit in the estate, it was evident that all palms were felled, shredded, windrowed and left to decompose. Furthermore, there had been no serious outbreak of pest attacks on the Estate.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the	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	Cluny Estate continued to use agrochemicals based on its Agricultural Reference Manual (ARM), SSOP and Pictorial Safety Standard Book (PSS) where written justifications had been provided for various fields operations. The Manual has included a chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estate continued to use pesticides as per the SOPs.

Clause	Indicators	Comply Yes/No	Findings
environment.	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	Cluny Estate had records to show the types of pesticides used with active ingredients and their LD50, where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. 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	Cluny estate was committed to minimise the usage of agrochemicals by implementing IPM. Blanket spraying was not practised by the Estate and soft grasses maintained in the field. It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section 15 -Plant Protection and that no prophylactic use of such pesticides would be permitted. Barn owls was encouraged by installing Barn Owls boxes in the fields. As part of the IPM plans, the management of all the estate had established beneficial plants (<i>Cassia cobanensis, Antigonan leptopus, and Turnera subulata</i>) nurseries for continuous planting in order to attract natural predators and thus reducing the use of insecticides. EFB applied at immature & mature areas was applied in single layers and is not dumped in large amounts to prevent breeding of Rhinoceros Beetles. However, in immature areas prophylactic spraying using diluted cypermethrin for immature palms in zero burning of oil palm to oil palm replanting was carried out against Rhinoceros Beetles as per SOP.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	There was no evidence of any prophylactic use of pesticides.
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	YES	Cluny Estate only used pesticides that are officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision Pesticides Act 1974 (Act 149) (Section 53A); and in accordance with USECHH Regulations (2000). There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used. The chemical store and chemical list indicated that the estate had none of the chemicals. The use of paraquat was banned in all SDPSB estates. Most pesticides used were class III & class IV.
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	As mentioned above in 7.2.5 of this checklist and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. The Estate had only used Class III and Class IV chemicals. Hence, the need for a judgment of the threat assessment does not apply on the Cluny estate.

Clause	Indicators	Comply Yes/No	Findings
	7.2.5b Why there is no other alternative which can be used. 7.2.5c Which process was applied to verify why there is no other less hazardous alternative. 7.2.5d What is the process to limit the	YES YES YES	As mentioned above in 7.2.5 of this checklist and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. The Estate had only used Class III and Class IV chemicals. Hence, the need for a judgment of the threat assessment does not apply on the Cluny estate.
	negative impacts of the application. 7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	YES	Records showed that pesticides were handled, used and applied by trained persons and as per the MSDS of the pesticide. The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the MSDS training. It was also noted that MSDS are available at all sites during the audit. The chemical store in the estate was found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). a) Records of purchase, storage and use were maintained. b) All store buildings were equipped with exhaust fans with the door was secured. c) Only authorized personnel are assigned to handle the chemicals. d) All the chemicals were segregated in storage accordingly. Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Thereafter disposal arrangement will follow accordingly as per procedures.All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issuance and replacement records were verified by the auditors. Workers observed carrying out spot spraying in Field 15B were using all required PPE as per the recommendations in the CHRA. Personnel such as the storekeepers, sprayers, fertilizers and rat bait handlers were trained and were known to the potential hazards and methods the chemicals should be used in a safe manner.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	The chemical store was found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). As above.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	All pesticide containers are properly disposed of and handled responsibly. It has been carried out in compliance with the SW management.

Clause	Indicators	Comply	Findings
	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/No YES	Aerial spraying was not practiced by Cluny Estate. This was also confirmed by interviewed workers.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	Medical surveillance for operators including pesticide operators was carried out on Nov-Dec 2022 by an Occupational Health Doctor. Results from the assessment show all the employees were fit.
	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	Cluny Estate 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> . During site visits there was no breastfeeding women and under age of 18 workers involved in chemical applications. The Estate maintained a 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 estate 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	Selaba SOU has identified all wastes and sources of pollution. The Waste Management Action Plan FY 2021 and 2022 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estate and mill operations were: •Air – sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping – biogas emission) – GHG. •Water – cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blowdown. •Land – scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste. Action taken: •Air emission has been controlled by mill by installed the ESP to captured particulate emission from boiler emission •Final discharge water has been monitored by monthly basis by accredited laboratory and reported to DOE. •SW has been disposed through DOE contractor and domestic waste has been disposed through Majlis Perbandaran land fill area.

Clause	Indicators	Comply Yes/No	Findings
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. 7.3.3 The unit of certification does not use open fire for waste disposal.	YES	On Selaba CU waste disposal of both Scheduled and Domestic waste were disposed according to established procedures that were understood by all (confirmed at interviews). The procedures for handling used chemicals classified under Environment Quality Regulation (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by certification & compliance unit. The document is Scheduled Wastes (Hazardous Waste) Management and is implemented in all SBPB estates and mills for all the applicable practices. During site visit at all units of certification, there was no evidence of open burning had been used for waste disposal. Records showed that Domestic Waste was disposed to government approved landfills: for Cluny Estate in Tapak Pelupusan Sampah Kg. Penderas and Mill at Majlis Pembandaran Teluk Intan Changkat Jong.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	Selaba 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. The SOP for manuring was in Section 8 of the Agricultural Reference Manual and Section 14 of the EQMS. Fertilizer application, which was of paramount importance for maintenance of soil fertility, was carried out based on the recommendation made by the agronomist from Sime Darby Research Sdn. Bhd. The recommendation by the Agronomist were also available during the inspection and the application of fertilizers had been carried out as recommended and scheduled.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	Agronomist visit has been carried out in June 2022 by Plant Nutrition & Protection Unit (PNP) for monitored: • Rainfall distribution & yield impact • Yield & age profile distribution • Palm nutritional status • Field observation & agronomic matters • Manuring history • Fertilizer recommendation Foliar sampling for the nutrients N, P, K, Mg, Ca & B had been carried out. The results of these samplings will form the basis for the fertilizers input recommendation to maintain and improve soil fertility for 2023. The soil analysis provided the indication of soil health and monitor the changes in the organic carbon and total nitrogen. Soil sampling was carried out on a 5-year cycle basis, last being in Sept 2018. The agronomist assessment and fertiliser recommendation were conducted by Sime Darby Research Sdn. Bhd. to formulate the manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Soil maps were made available and reviewed by the auditors.

Clause	Indicators	Comply Yes/No		Findings	s			
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	YES	Cluny Estate continued to have a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting to cut mass to decompose in the field and EFB mulching. For EFB application on the estate, prior was given for application in young mature areas and replants.					
	7.4.4 Records of fertiliser inputs are maintained.	YES	Record fertilizer input were main	ntained accordingly. R	Reviewed during the assessment.			
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available. 7.5.2 No replanting on steep slopes (above 25 degress) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	Auditors verified the Soil Map pro 23/02/2015. There are no margin follows: Type Muchong Seramban/Muchong Seremban Trlemong / Local Alluvium Gajah Mati Rasau Alluvium / Colivium Serdang Unclassified Cluny Estate had a managemer and degradation of soils. The plate of	% 33.22 26.70 18.72 8.83 4.40 3.93 3.05 0.86 0.29 nt strategy for plantin antings on slopes betward process of the service of	Section 4 ual. y individual, contiguous area of steep terrain control erosion and degradation of soils were application, avoidance of blanket spraying, nance of soft vegetation in interlines. some mature areas. The cover crop Mucuna y management. Large areas with Neprolepis			
	7.5.3 There is no new planting of oil	YES	It was observed that there was n	no new planting of oil	palm on steep terrain.			

Clause	Indicators	Comply Yes/No	Findings
7.6 Soil surveys and topographic information are used for site planning in the	palm on steep terrain. 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	Cluny Estate had a management strategy for palm oil cultivation, taking into account the soil maps and surveys identifying marginal and fragile soils, including steep terrain for the palm oil long term suitability. The soil maps were provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in the estate.
establishment of new plantings, and the results are incorporated into plans and operations.	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	Auditors verified the Soil Map prepared by R & D -RSGA Precision Agriculture Uit (NHS). There are no marginal and fragile soils on Cluny Estate
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	The management of Cluny Estate continued to use Soil surveys and topographic information guide in the planning of drainage and irrigation systems, roads and other infrastructure.
7.7 No new planting on peat, regardless of depth after 15	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	YES	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to estate. Based on the audit findings, it is confirmed that there was no new planting or new development of areas at Cluny Estate. Furthermore, as per the soil maps and site visits there is no peat soils on the estate.
November 2018 and all peatlands are managed responsibly.	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 Nov 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	YES	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to estate. Based on the audit findings, it is confirmed that there was no new planting or new development of areas at Cluny Estate. Furthermore, as per the soil maps and site visits there is no peat soil on the estate.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to estate. Based on the audit findings, it is confirmed that there was no new planting or new development of areas at Cluny Estate. Furthermore, as per the soil maps and site visits there is no peat soil on the estate.

Clause	Indicators	Comply Yes/No	Findings
	7.7.4 (C) A documented water and	YES	Auditors have verified through checking the www.globalforestwatch.com, Google Maps, Estate
	ground cover management		Maps and also through site visit to estate. Based on the audit findings, it is confirmed that there
	programme is in place.		was no new planting or new development of areas at Cluny Estate. Furthermore, as per the soil
	7.7.5 (C) For plantations planted on	YES	maps and site visits there is no peat soil on the estate.
	peat, drainability assessments are		
	conducted following the RSPO		
	Drainability Assessment Procedure, or		
	other RSPO recognised methods, at		
	least five years prior to replanting. The		
	assessment result is used to set the		
	timeframe for future replanting, as well		
	as for phasing out of oil palm		
	cultivation at least 40 years, or two		
	cycles, whichever is greater, before		
	reaching the natural gravity drainability		
	limit for peat. When oil palm is phased		
	out, it ii is replaced with crops suitable		
	for a higher water table (paludiculture)		
	or rehabilitated with natural		
	vegetation.		
	This is subject to transitional (5 years:		
	2019 to 2025) arrangement stated in		
	the Drainability Assessment		
	Procedure. Within 12 months initial		
	implementation period, company could		
	submit other alternate methodologies		
	to be considered by RSPO for		
	recognition.	VEO	
	7.7.6 (C) All existing plantings on peat	YES	
	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.		
	7.7.7 (C) All areas of unplanted and	YES	Based on site visits and the Soil Map prepared by R & D -RSGA Precision Agriculture Uit (NHS)
	1.1.1 (O) All aleas of unplanted and	ILO	Dased on site visits and the son map prepared by n & D -nodh riecision hymenicial Oil (NNS)

Clause	Indicators	Comply Yes/No	Findings
	set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.		dated 23/02/2015 and site visits there are no peat soils on Cluny estate.
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: 7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. 7.8.1b Workers have adequate access to clean water.	YES	Cluny estate had in place and implemented water management plans. Plans for 2021 and 2022 were sighted and latest accordingly. The water management plans were tailored towards how to increase rainwater collection, to Improve user awareness and domestic use. 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. As verified at SOU facilities was provided for such sanitation facilities, water tank, etc. through interview with workers, all workers have obtained adequate access to clean water via Syarikat Lembaga Air Perak.
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	YES	SOU Selaba continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estate adopted the existing SDP policy to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management. The buffer zones established are as follows:

Clause	Indicators	Comply Yes/No				Findings	;		
		Yes/No		> 20 10 5 - <				ble. During the field visit there	
	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. 7.8.4 Mill water use per tonne of FFB	YES	 License valid until 30/06/2023 @ 40mt/hr Discharge method – Water course. Effluent analysis tests for final discharge were carried out on a m internal accredited lab from Sime Darby Research Sdn Bhd, Carey were within the limit. The quarterly report sent to DOE accordingly. 						
7.9 Efficiency of fossil fuel use and the use	is monitored and recorded. 7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and	YES	Plan for established			of the use of fossil fu	iels and to op	timize renewable energy has	
of renewable energy is optimised.	documented.			No. 1	Diesel	-servicing vehicle in timely on contractual basis to en use of fuel and preventive to avoid leakagesto educate workers by ha on fuel saving practices i. engine when vehicle not in open burning at linesing idle timeTo record vehicle activity eliminate wasteful activitie	sure efficient e maintenance aving program e turn off the n used. te gine is turn off	Assistant manager & foremen	

Clause	Indicators	Comply Yes/No			Fi	ndings												
			2.		replacing energy quarters and usin up street light & c -educate workers	saving appliances, saving bulb at workers g photo -censor to light ompound spotlight. on saving energy electric switch when	Assistant Manager & QA											
) (T.O.	Environmental i) Environm ii) Environm iii) Fossil fue	Aspect and Impa ental Aspect Idea ental Impact Eva I Reduction Plan	n place incorporated into the , identified in the following 2 reviewed accordingly. reviewed accordingly.													
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new	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	products, EIA, through RSPC footprint repor available repor	pollution preven Palm GHG cal t to the RSPO t) Below table is	ition plan, etc. for lculator version and RSPO and for year 2021 c	or year 2021 and 2022 4 (data as table belonual communication of	and mill through list of waste 2. CU calculated the emission ow). CU also submitted GHG of progress (ACOP) (publicly											
developments are designed to			Description	tCO₂e/tProduct	Extraction Ra	ite %												
minimise GHG emissions.			CPO	4.01	OER	19.69												
														PK	4.01	KER	4.76	_
												Land Use			На			
											OP Planted on mineral soil			24711.78				
			OP Planted on Peat			0												
			Conservation (forested)			0												
			Conservation	(non-forested)		0												

Clause	Comply Yes/No	Findings							
		Total			24711.78	3			
		Summary of Plant	tation/field em	nissions ar	nd sink				
		Description		Own			Group)	
			tCO2e	tCO2e/ha	tCO2e/tFFB	tCO2e	tCO2e/ha	tCO2e/tFFB	
		Land conversion	32878.50	2.29	0.56	101548.24	9.78	5.53	
		CO2 emission from fertilizer	3688.25	0.26	0.06	15253.23	1.47	0.83	
		N2O Emissions from Peat	0	0	0	0	0	0	
		N2O emission frm fertilizer	2211.94	0.15	0.04	9594.51	0.92	0.52	
		Fuel consumption	18.99	0.00	0	94.16	0.01	0.01	
		Peat Oxidation	0	0	0	0	0	0	
		Crop sequestration	-30964.78	-2.16	-0.53	-96254.24	-9.27	-5.24	
		Sequestration in conservation area	0	0	0	0	0	0	
		Total	7832.89	0.55	0.13	30235.89	2.91	1.65	
		Summary of Mill 6	emission and	credits					
		Descri	ption	tC	02	tCO2e/tFFB			
		PON	ИΕ	316	23.69	0.20			
		Fuel Cons	sumption	13	3.96	0.00			
		Grid Electricit	y Utilisation		0	0.00			
		Export of Exces Housing	s Electricity to & Grid	o	.00	0.00			

Clause	Indicators	Comply Yes/No	Findings						
			Sale of PKS	0.00	0.00				
			Sale of EFB	0.00	0.00				
			Total	31637.67	0.20				
			Palm Oil Mill Effluent (POME) Trea	atment					
			Diverted to compost	0%					
			Diverted to anaerobic digestion	100%					
			POME Diverted to Anaerobic Dige	estion					
			Diverted to anaerobic	c pond	100%				
			Diverted to methane capt	ure (flaring)	0%				
			Diverted to methane capture (ele	Diverted to methane capture (electricity generation)					
	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	YES	Auditors has verified through checking the www.globalforestwatch.com , Google Maps, Est Maps and also through site visit to the sampled estate areas. Based on the observation during the audit, it is confirmed that there were no new planting or r development of areas at SOU Selaba Hence, RSPO GHG Assessment Procedure for N Development was not applicable.						
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and	YES	The CU established the <i>Pollution Prevention Plan</i> 2021/2022 among others addressing following environmental issues;						
	monitored.			Mitigation measures					
			during chemical mixing	recycled during mixing	1	al mixing area to be emical mixing area to			

Clause	Indicators	Comply Yes/No	Findings				
						contain leakages	
				2	Contaminated ground / soil at workshop area	to replace tray whenever tractors / machines under repairing progress to avoid oil spillage on the ground periodic checking on oil sump to ensure it is well maintained and to avoid any leakages	
				3	Prohibited spraying at line site	education to workers not to spray at the line site and explain reason for such a directive. periodic checking at the line site	
				4	Prohibited spraying & fertilizer or chemical near the river (buffer zone)	provide training and create awareness to workers identifying and marking the buffer zones	
				5	To reduce dark smoke emission	-Quarterly stack sampling has been carried out by external bodies -Carry out routine maintenance Install CCTV link direct to DOE	
				6	Waste water discharge through land	-Regularly effluent ditches and its surrounding for leakageto conduct clean up all the trap regularly	
				7	Chemical and lubricant spillage	-to ensure used oil and rag in drums are properly stacked and well contained -to clean regularly all the sand and oil trap	
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	Cluny Estate complied to the strict Zero Burning Replanting Technique practiced in relation to all new plantings, replanting or other development which published in their website http://www.simedarbyplantation.com/sustainability/beliefs-progress/practices-key-initiatives/good-agricultural-practices/zero-burning-replanting-technique . There was no evidence to show that fire had been used for preparing land for replanting. In the 2022 areas, during the audit in the estate, it was evidence that all palms were felled, shredded, windrowed, and left to decompose				
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	Selaba SOU had established fire prevention and control measures for the areas under its direct management. The CU had established Emergency Response Team for firefighting and had the necessary equipment to fight fires.				
	7.11.3 The unit of certification engages with adjacent stakeholders	YES	Selaba SOU had engaged adjacent stakeholders on fire prevention and control measures via stake holder meetings. The points were: • We extend our zero Burning Policy to our neighbors • Not only do we help them to improve to monitor fire occurrences, we will help to put out the fires as soon as we are alerted to prevent further damage. In addition, for alerting GSM had established an Operational Control Procedure, titled 'Fire Hotspot Alert System & Monitoring'.				
	on fire prevention and control						
	measures.						
7.12	7.12.1 (C) Land clearing since	YES				nce Nov 2005 in Cluny Estate, thus this Indicator was not	

Clause	Indicators	Comply Yes/No	Findings
Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	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.		Applicable.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as 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	SOU Selaba has reviewed their HCV with a new assessment conducted on Dec 2015. The new HCV assessment titled 'HCV Re-Assessment For SOU 5 – Seri Intan / Selaba which included both the planted area and relevant wider landscape-level considerations with villages and forest reserved. Based on the HCV assessment report, there was only HCV 4 declared in SOU Selaba, and the total area of HCV area for SOU Selaba is 6.49ha HCV area.
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.		
	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	NO	Progress of implementation of the action plans 'HCV Management Plan FY: 2022 Objectives & Target – for Cluny Estate were reviewed and verified on the ground. The action Plan contains monitoring requirements and updated every year, for Cluny Estate HCV Plan including monitoring programmed was updated in Jan 2022. Some of action highlighted in the plan are: - Planted the Signage - Enrichment Planting of Specific Tree Species to attract wildlife - Training - Continuous monitoring - Training - No Chemical Interventions and Manuring

Clause	Indicators	Comply Yes/No	Findings
	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).		- Establish Soft Grasses - Rehabilitation Buffer zones by planting a beneficial plant However, it was found that, HCV management Plan has been developed at Cluny Estate under SOU 5a Selaba with the last conduct of Management Plan with participation of stakeholder is in Dec 2015. But the 2022 HCV integrated management plan is not reviewed at least once every five years in consultation with relevant stakeholders such as Wildlife Department to identify any relevant wider landscape level considerations. Thus, Major NCR MZK 01 2022 has been raised against this indicator.
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	YES	HCV Re Assessment has been done on Dec 2015, but no rights of local communities have been identified in HCV areas. Thus, this indicator was not applicable.
	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, SOU Selaba still conduct programme to regularly educate the workforce about the status of RTE species in Malaysia. Sime Darby also still established their own disciplinary measures if any of their staff or workers found to capture, harm, collect or kill the RTE species. If found any activities to capture, harm, collect or kill RTE species, the estate will make a report to the Wildlife Department immediately.

Clause	Indicators	Comply Yes/No	Findings
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	YES	Progress of implementation of the action plans 'HCV Management Plan FY: 2022 Objectives & Target – for Cluny Estate were reviewed and verified on the ground. No RTE species were found within the estate 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. The outcomes of monitoring will be feedback into the next year action plan.
	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 there is no new land clearing
AUDITORS' GUIDE IN		licable) – FO	R NON-COMPLIANCES, TO RAISE AT SPECIFIC INDICATORS IN THE MYNI CHECKLIST.
No specific clause – Information related to Orang Asli / Indigenous People:	To include details on Orang Asli	-	 Kampung Sungai Bill (More Than 50 Family and 100 over resident) and Kampung Kuala Bill (More than 40 Family and 100 over residence) There are 2 Orang Asli villages at Cluny Estate which is Kg Kuala Sungai Bill and Kg Sungai Bill. Kg Sungai Bill is nearest to Sungai Bill division and Kampung Kuala Bill is within in the 10 km radius from another division. There are updated stakeholder list inclusive of this 2-village orang asli. The SEIA dated Mar 2014 and addendum has been in placed in April 2019 already identified both of this villagers and during this assessment assessor has interviewed with Dollah which is Tok Batin from Kampung Sungai Bill, There is no significant issues since Cluny Estate always helping them in case of anything. They also depend on JAKOA if they have an issue since JAKOA always helping them. For Kampung Kuala Bill, the Assessor are trying to reach the Kamarudin (Tok Batin Kuala Bill) but can't reach to tok batin since he has a meeting with JAKOA. Assessor also verify through latest stakeholder meeting dated 5/10/2021 no issues has been highlighted by both Tok Batin. Consultation with Tok Batin from Kampung Sungai Bill, There is no significant issues since Cluny Estate always helping them in case of anything. Tok Batin also said that he will reach to the manager if they need help as both of them had the AM and Manager numbers. They also depend on JAKOA if they have an issue since JAKOA always helping them. For Kampung Kuala Bill. The Assessor are trying to reach the Kamarudin (Tok Batin Kuala Bill) but can't reach to tok batin since he has a meeting with JAKOA No FPIC needed as no issues related to the land and their daily needs, roaming area, sacred area, grave, food source since they freely to go all around the estate for fishing and hunting.

Clause	Indicators	Comply Yes/No	Findings
			No issues with their education for children since JAKOA are helping them through transportation to school and some of their Parents are send their children by themselves to the school. Half of the Sungai Bill and Kuala Bill villagers are working with Cluny Estate as FFB Collector, Mandore and Sprayer. 7. CSR from Cluny are they provide the Job to Orang Asli. And no specific request from orang Asli. 8. Consultation with DFO of Forestry Dept confirmed no issues related to Orang Asli. 9. Representtaives From Kampung Sungai Bill and Kamarudin from Kampung Kuala Bill (through Phone)
	Common social issues on Orang Asli.		 No issues related to accessibility and their daily needs, roaming area, sacred area, grave, food source since they freely to go all around the estate for fishing and hunting. No issues with their education for children since JAKOA are helping them through transportation to school and some of their Parents are send their children by themselves to the school. Half of the Sungai Bill and Kuala Bill villagers are working with Cluny Estate as FFB Collector, Mandore and Sprayer. No issues of Protection of cemetery of Orang Asli since no cemetery in the estate. Half of the Sungai Bill and Kuala Bill villagers are working with Cluny Estate as FFB Collector, Mandore and Sprayer. All orang Asli here is educated and they understand the employment procedure and agreement since all their agreement in Bahasa Malaysia. All their agreement is complied with the RSPO P&C MYNI They receive the same treatment with all the workers in Cluny Estate, inclusive of Training and briefings and also PPE. There are no issues related to Replanting with Orang Asli community They receive water at their villages from Lembaga Air Perak. And nearby river is for their fishing needs. For Hunting in the estate there is no issues since Cluny Estate have allowed them to freely roam surrounding the Estate. No issues with their education for children since JAKOA are helping them through transportation to school and some of their Parents are send their children by themselves to the school.
	What CU needs to do to address the issues		 Assessor verified through latest stakeholder meeting dated Oct 2021 no issues has been highlighted by both Tok Batin. Consultation with Tok Batin from Kampung Sungai Bill, There is no significant issues since Cluny Estate always helping them in case of anything. Tok Batin also said that he will reach to the manager if they need help as both of them had the AM and Manager numbers. They also depend on JAKOA if they have an issue since JAKOA always helping them. Tok Batin highlighted that besides the annual meeting there is also frequently unofficial meeting by the manager. The SEIA Plan dated in Dec 2021 has updated with orang Asli as verify through stakeholder

Clause	Indicators	Comply Yes/No	Findings
			 meeting dated Oct 2021 and no issues has been highlighted. 3. As of the explanation above, grievances, dispute mechanism procedure are already in place and clearly explain to them as both of the Tok Batin have the AM and Manager Numbers, they also seek clarification and complaints if anything to the Cluny Estate office, but as of to date no issues has been highlighted during interviewed with them. 4. Half of the Sungai Bill and Kuala Bill villagers are working with Cluny Estate as FFB Collector, Mandore and Sprayer 5. No issues of Protection of Orang Asli sacred area or grave of Orang Asli since no Orang Asli sacred area or grave in the estate.

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

Clause	Indicators	Comply Yes/No	Findings
5.5.2 Time-bound plan A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.	(a) As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	YES	Sime Darby Plantation 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. Indonesia Operations – as of January 2022 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=00P90000 O1OioYJEAZ PT Sandika Natapalma Only Karya Palma Estate yet to be certified - Pending confirmation from Badan Pertanahan National (BPN) on Hak Guna Usaha (HGU) Document. 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.
			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.
			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.
			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.
			<u>Liberia Operations – as of January 2020</u>
			As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby
			Plantation Investment (Liberia) Pte Ltd has completed its disposal of its
			entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to
			Mano Palm Oil Industries Ltd (MPOI).
			http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations
			piantation-completes-divestment-of-its-liberia-operations
			New Britain Palm Oil (NBPOL) Operations – as of March 2021
			Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.
			Last Certified on 27 March 2020. There is total area for NPP: 710.30 ha
			which is currently excluded from the certification scope until the NPP is
			approved.
(b	Progress towards this plan shall be	YES	There are six (6) CU in Indonesia Operations highlighted in the time-
/2	verified and reported on in	120	bound plan and the certification progress consistent with that in the time-
	subsequent annual surveillance		bound plan. The progress details as provided in the TBP in Attachment 6.
	audits by the CB. Where the CB		The Sustainability Section team have conducted the periodic internal
	conducting the surveillance audit is		audit accordingly.
	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;		
(c	Any revision to the time-bound plan	YES	Sime Darby Plantation Berhad (SDP) membership is before 2018 and
	or to the circumstances of the		time bound plan maximum up to 30th June 2023. As at January 2022, no
	company shall cause the time-		deviation of TBP and approval by RSPO Secretarial are not required.
	bound plan to be reviewed by the		SDP is progressively undergoing the RSPO Certification process towards

		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);		100% RSPO certification of estates/mills. Currently, only Indonesia operation yet to be certified.
	(d)	Where there are isolated lapses in implementation of a time-bound plan, a minor non- compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.	YES	The details of the Time Bound Plan described as per attachment 6. SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP. As of this audit and Verification of documents and Timebound Plan there are no isolated lapses and fundamental failure to proceed with implementation of the plan in implementation of a time-bound plan
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. Any new plantings since 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	YES	Verification through www.globalforestwatch.com , GOOGLE maps data, estates maps and through HCV assessment report, and planting profile evidenced that there was no new planting and no new development of area observed. Support also with internal and external audit (ISPO certified) there was no replacement of primary forest or HCV areas in the uncertified management unit. Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;	YES	No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as both sites was disposed. The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancies between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of 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 by the audit team based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach: • A positive assurance statement is made, based upon self-	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 compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance. No critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates. Respective sites-maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company.
	assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement;		
	Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.	YES	
	Desktop study e.g. web check on relevant complaints	YES	
	If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-	YES	

	compliance with the		
	requirements.		
(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and noncritical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.	YES	
		YES	
(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.	165	

5.6.6 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.	No additional indicators	YES	As it has been mentioned in 2.2.1 of this checklist, the Land Title for all Estate has been verified, for all estates. The Land Title was under the name of Sime Darby Plantation Bhd. Each estate had legal use of the land through Lands and Surveys Department following the payment of premium and Land fee. Based on this, it has been confirmed that there was no such case concerning the rights of local communities or indigenous people in the SOU.
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.			
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.			

ATTACHMENT 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
7.12.4	Major	Finding: The integrated management plan was not reviewed at least once every five years in consultation with relevant stakeholders	Root cause: The stakeholder identification process is not comprehensive / not effective to include all relevant stakeholders related	The Wildlife Department has been engaged on 3 Feb 2023 and the other 2 stakeholders has been engaged by 24 Feb 2023.
MZK 01 2022		Objective evidence: HCV management Plan has been developed at Cluny Estate under SOU 5a Selaba with last conduct of Management Plan with participation of stakeholder is in December 2015. But the 2022 HCV integrated management plan is not reviewed at least once every five years in consultation with relevant stakeholders such as Wildlife Department to identify any relevant wider landscape level considerations.	to HCV management on a landscape perspective. The meeting did not involve participation of wildlife department as wildlife department was not identified in the estate stakeholder list, and the estate is not directly bordering any reserved forest area. The closest forest reserved is within 15km distance.	Results of communication with relevant stakeholders have been used as the action plan for monitoring the HCV areas. Also sighted, the list of stakeholders already included all the relevant stakeholder i.e wildlife department and Jabatan Pengairan dan Saliran. Status: closed
			Corrective Action: To immediately conduct review of the stakeholder list and to update stakeholder list to include all relevant stakeholders on a landscape basis. Among the stakeholder added to the stakeholder list include the Wildlife Department, Forestry Department, and Jabatan Pengairan,	
			To invite the newly added stakeholder for the HCV management plan review processed which include stakeholder meeting/discussions on relevant issue related to wildlife protection, identification of any endangered, rare, threatened species and any other best management practices for HCV	
			management/enhancement purposes. The Wildlife Department has been engaged on 3 Feb 2023 and the other 2 stakeholders will be engaged by 24 Feb	

	2023. The HCV management plan will be updated after the engagement with the respective stakeholders by the next HCV Management Plan review tentatively scheduled in Aug 2023.	
	To conduct yearly review of stakeholder listing together with together with GSD - Conservation and Biodiversity Unit to effectively include all or any new stakeholder in the stakeholder list relevant to HCV management for inclusion in the HCV management plan review process.	

ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

	& C icator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
N	NA	NA	NA	NA	NA

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

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

No	Management Unit (SOU Name)	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
		Sungai Dingin Oil Mill	-		Certified		
		Anak Kulim Estate	-		Certified		
		Sungai Dingin Estate	-		Certified		
	Sg. Dingin	Somme Estate	-	Karangan, Kedah	Certified	10 4	
1	Sg. Dingin	Bukit Selarong Estate	-		Certified	12-Aug-10	
		Padang Buluh Estate	-		Certified		
		Bukit Hijau Estate	-		Certified		
		Jentayu Estate	-		Certified		
		Chersonese Oil Mill	-		Certified		
		Chersonese Estate	-	Kuala Kurau, Perak	Certified		
2	Chersonese	Kalumpong Estate	-		Certified	5-Oct-11	
		Tali Ayer Estate	-		Certified		
		Holyrood Estate	-		Certified		
		Elphil Oil Mill	-		Certified		
	E	Kamuning Estate	-	0 0:	Certified	10 1 11	
3	Elphil	Elphil Estate	-	Sg Siput, Perak	Certified	18-Jun-11	
		Kinta Kellas Estate	-		Certified		
		Flemington Oil Mill	-		Certified		
		Flemington Estate	-		Certified		
4	Flemington	Bagan Datoh Estate	-	Teluk Intan, Perak	Certified	5-Oct-11	
		Sabak Bernam Estate	-		Certified]	
		Sg. Samak Estate	-		Certified]	

				I			
		Seri Intan Oil Mill	-		Certified	-	
		Selaba Oil Mill	-		Certified		
		Seri Intan (+ Selaba) Estate	-		Certified		
5	Seri	Sabrang Estate	-	Teluk Intan, Perak	Certified	3-Mar-11	
	Intan/Selaba	Sogomana Estate	-		Certified		
		Sg. Wangi Estate	-		Certified		
		Bikam Estate	-		Certified		
		Cluny (+ Bedford) Estate	-		Certified		
		Tennamaram Oil Mill	-		Certified		
	Tennamaram	Tennamaram Estate	-	Bestari Jaya, Selangor	Certified	3-Mar-11	
6		Sungai Buluh Estate	-		Certified	3-Mar-11	
		Bukit Talang Estate	-		Certified		
		Bukit Kerayong Oil Mill	-		Certified		
7	Bkt Kerayong	Bukit Kerayong Estate	-	Kapar, Selangor	Certified	15-Apr-11	
		Bukit Cheraka Estate	-		Certified		
		East Oil Mill	-		Certified		
	East	East Estate	-	Carey Island,	Certified	10 M 10	
8		Sepang Estate		Selangor	Certified	19-May-10	
		Dusun Durian Estate	-		Certified		
)A/+	West Oil Mill	-	Carey Island,	Certified	10.1410	
9) I West -	West Estate	-	Selangor	Certified	19-May-10	

		Dudgit Dutoni Oli Milli			O =		
10	Bukit Puteri	Bukit Puteri Oil Mill	-	Raub, Pahang	Certified	7-Jul-11	
		Bukit Puteri Estate	-	y	Certified		
11	Kerdau	Kerdau Oil Mill	-	Temerloh, Pahang	Certified	7-Jul-11	
		Kerdau Estate	-	remenon, ranang	Certified		Jentar Estate has merged with Kerdau Estate and reported to the CB in
		Mentakab Estate	-		Certified		March/April 2021.
		Chenor Estate	-		Certified		•
		Sg Mai Estate	-		Certified		
12	Jabor	Jabor Oil Mill	-	Kuantan, Pahang	Certified	7-Jul-11	
12	Jabol	Jabor Estate	-	Ruanian, Fanang	Certified	/-Jui-11	
13	Labu	Labu Oil Mill	-	Nilai, Negeri	Certified	30-Dec-11	New Labu Estate has become a division
13	Labu	Labu Estate	-	Sembilan	Certified	30-Dec-11	of Labu Estate.
		Tanah Merah Oil Mill	-		Certified		
14	Tanah Merah	Tanah Merah Estate	-	Port Dickson, Negeri Sembilan	Certified	19-May-10	
		Bukit Pelandok Estate	-	Negen Sembilan	Certified		
		Sua Betong Oil Mill	-		Certified		
		Sua Betong Estate	-		Certified		
		Sengkang Estate	-		Certified		Siliau Estate has now been merged into
4.5	Over Determin	Bradwall Estate	-	Port Dickson,	Certified	40 F-b 44	Salak Estate and Bradwall Estate.
15	Sua Betong	PD Lukut Estate	-	Negeri Sembilan	Certified	18-Feb-14	
		Tampin Linggi Estate	-		Certified		
		Sg. Bahru Estate	-		Certified		
		Salak Estate	-		Certified		
		Kok Foh Oil Mill	-		Certified		
		Muar River Estate	-		Certified		Sg. Gemas Estate has now been merged
		Sg. Senarut Estate + Sg Gemas Estate	-	Bahau, Negeri	Certified		into Sg Senarut Estate
16	Kok Foh	Kok Foh Estate	_	Sembilan	Certified	7-Jul-11	
		Bukit Pilah Estate	-]	Certified		
		St. Helier Estate	-		Certified		
		Sungai Sabaling Estate	-]	Certified		

		Pertang Estate	-		Certified		
		Kempas Oil Mill	-		Certified		
		Kempas Estate	-		Certified		
17	Kempas	Tangkah Estate	-	Jasin, Melaka	Certified	20-May-10	Serkam Estate, previously from SOU18(Diamond Jubilee) is now part of
		Kemuning Estate	-		Certified		SOU 17(Kempas)
		Serkam Estate	-		Certified		
		Diamond Jubilee Palm Oil Mill	-		Certified		Serkam Estate, previously from SOU18(Diamond Jubilee) is now part of
18	Diamond Jubilee	Diamond Jubilee Estate	-	Jasin, Melaka	Certified	5-Oct-11	SOU 17(Kempas).
	dubilee	Bukit Asahan Estate	-		Certified		Welch Estate, previously from SOU 19(Pagoh) is now part of SOU
		Welch Estate	-		Certified		18(Diamond Jubilee)
		Pagoh Oil Mill	-		Certified		
19	D	Pagoh Estate	-	Maran Jahan	Certified	00 1 14	
	Pagoh	Lanadron Estate	-	Muar, Johor	Certified	28-Jan-14	
		Pengkalan Bukit Estate	-		Certified		
		Chaah Oil Mill	-		Certified		
20	Chaah	Chaah Estate	-	Chaah, Johor	Certified	18-Nov-10	
20	Onaan	Sg. Simpang Kiri Estate	-	Griadri, Jorioi	Certified		
		North Labis Estate	-		Certified		
		Gunung Mas Oil Mill	-		Certified		* SDP acquired Lian Seng Estate in
		Gunung Mas Estate	-		Certified		Johor in April 2017. Lian Seng Estate is
21	Gunung Mas	Kempas Klebang Estate	-	Kluang, Johor	Certified	19-May-10	merged into Bk Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been
		Bukit Paloh Estate	-		Certified		incorporated in the RSPO Certification
		Yong Peng Estate	-		Certified		Scope of SOU Gunung Mas in 2018.
		Bukit Benut Oil Mill	-		Certified		* SDP acquired Talisman Estate in Johor
	Bukit Benut	Bukit Benut Estate	-		Certified		in April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk
22		Lambak Elaeis Estate	-	Kluang, Johor	Certified	5-Oct-11	Benut and has been incorporated in the
		CEP Nyior Estate	-	Ū.	Certified		RSPO. Certification Scope of SOU Bk Benut in 2018.
23	Ulu Remis	Ulu Remis Oil Mill	-	Layang-layang,	Certified	11-Apr-11	

		Ulu Remis Estate	-	Johor	Certified		
		Cenas Estate	-		Certified	1	
		Bukit Badak Estate	-		Certified]	
		Tun Dr. Ismail Estate	-		Certified		
		Pekan Estate	-		Certified		
		Sembrong Estate	-		Certified		
		Hadapan Oil Mill	-		Certified		
		Sri Pulai Estate	-		Certified		
24	Hadapan	Kulai Estate	-	Layang-layang, Johor	Certified	29-Mar-11	
		Layang Estate	-	001101	Certified		
		CEP Renggam Estate	-		Certified		
		Sandakan Bay Oil Mill	-		Certified		
		Tun Tan Siew Sin Estate	-		Certified		
26	Candakan Day	Tunku Estate	-	Candalian Cahah	Certified	1-Oct-08	
20	Sandakan Bay	Tigowis Estate	-	Sandakan, Sabah	Certified	1-001-06	
		Sentosa Estate	-		Certified		
		Segaliud Estate	-		Certified		
		Melalap Oil Mill	-		Certified		
27	Melalap	Melalap Estate	-	Tenom, Sabah	Certified	21-Jan-11	
		Sapong Estate	-		Certified		
		Binuang Oil Mill	-		Certified		
		Binuang Estate	-		Certified		
28	Binuang	Sungang Estate	-	Kunak, Sabah	Certified	16-Jan-09	
		Tingkayu Estate	-		Certified		
		Jeleta Bumi Estate	-		Certified		
		Giram Oil Mill	-		Certified		
29	Giram	Giram Estate	-	Kunak Sabah	Certified	16-Jan-09	
		Mostyn Estate	-		Certified		
		Merotai Oil Mill	-		Certified		
00	Mayata:	Merotai Estate	-	Taway Cabab	Certified	10 1 00	
30	Merotai	Imam Estate	-	Tawau, Sabah	Certified	16-Jan-09	
		Tiger Estate	-		Certified		

		Table Estate	_	7	Certified]	
		Lavang Oil Mill			Certified		
		Lavang Estate	_	-	Certified	-	
		Rasan Estate	_	_	Certified	-	
		Belian Estate	-		Certified	-	
		Kelida Estate	_	1	Certified	1	
31	Lavang	Lavang (Special) Estate	_	Bintulu, Sarawak	Certified	30-Dec-11	
01	Lavarig	Pekaka Estate	_	Diritala, Sarawak	Certified	30-Dec-11	
		Ruai Estate	_	1	Certified	1	
		Dulang Estate	_	1	Certified	1	
		Charquest Estate	_	-	Certified	-	
		Paroh Estate	_		Certified	-	
		Rajawali Oil Mill	_		Certified		
		Rajawali Estate	_	Bintulu, Sarawak	Certified		
32	Rajawali	Samudera Estate	_		Certified	30-Dec-11	
	aja.ra	Semarak Estate	_		Certified	1	
		Bayu Estate	-		Certified	-	
		Derawan Oil Mill	-		Certified		
		Derawan Estate	-		Certified		
33	Derawan	Sahua Estate	-	Bintulu, Sarawak	Certified	30-Dec-11	
		Takau Estate	-		Certified		
		Damai Estate	-		Certified		
34	Pekaka	Pekaka Mill	-	Bintulu, Sarawak	Withdrawn	NA	Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang.

35	Bintang	Bintang Oil Mill	-	Johor	NA	NA	* SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1st Oct 2018, the mill has completed the selling off transaction.
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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)
	PT Lahan Tani	Alur Dumai Mill	-		Rokan Hilir	Certified	10 1 10	
1	Sakti	Alur Dumai Estate	-		District – Riau	Certified	16-Jan-12	
		Mustika Mill	-		Tanah Bumbu	Certified	3-Jul-13	
2	PT Sajang	Mustika Estate	-		District –	Certified	3-Jul-13	
	Heulang	Pantai Bonati Estate	-		South Kalimantan	Certified	6-Jul-11	
	PT	Angsana Mill	-		Tanah Bumbu	Certified		
3	Ladangrumpun	Angsana Estate	-		District –	Certified	6-Jul-11	
	Suburabadi	Gunung Sari Estate	-		South Kalimantan	Certified		
		Bebunga Mill	-		rammamam	Certified		
l .	PT Langgeng	Bebunga Estate	-		Kotabaru	Certified		
4	Muaramakmur	Sungai Cengal Estate	-		District – South	Certified	16-Mar-12	
		Bakau Estate	-		Kalimantan	Certified		
		Sukamandang Mill	-		Seruyan and	Certified		
		Sukamandang Estate	-		Éast	Certified		
5	PT Kridatama Lancar	Sapiri Estate	-		Kotawaringin District –	Certified	5-Jul-11	
	Lancai	Barasdanum Estate	-		Central	Certified	1	
		Kuala Kuayan Estate	-		Kalimantan	Certified	<u></u>	
6	PT Bahari	Ladang Panjang Mill	-		Muaro Jambi	Certified	9-Jul-12	Only Division 3 is certified

	Gembira Ria	Ladang Panjang Estate	-		District - Jambi	Certified	9-Jul-12	(1,202 Ha). Total Areas of Divison 1 and 2 (1,796.19 ha) HGU still in process.
		Manggala Mill	-			Certified		
7	PT Tunggal Mitra	Manggala 1 Estate	-		Rokan Hilir	Certified	25-Nov-10	
/	Plantations	Manggala 2 Estate	-		District – Riau	Certified	25-1100-10	
		Manggala 3 Estate	-			Certified		
		Pondok Labu Mill	-			Certified		
	PT Paripurna	Pondok Labu Estate	-		Kotabaru	Certified		
8	Swakarsa	Binturung Estate	-		District – South	Certified	16-Mar-12	
		Rampa Estate	-		Kalimantan	Certified		
		Sesulung Estate	-		- 	Certified		
		Gunung Aru Mill	-			Certified		
		Gunung Aru Estate	-		Kotabaru District – South Kalimantan	Certified		
9	PT Bersama Sejahtera Sakti	Gunung Kemasan Estate	-			Certified	5-Jul-11	
	Sejaniera Sakii	Laut Timur Estate	-			Certified		
		Pantai Timur Estate	-			Certified		
		Rantau Panjang Mill	-			Certified		
		Rantau Panjang Estate	-			Certified		
	0 PT Guthrie ecconina	Bumi Ayu Estate	-		Musi	Certified		
10		Karang Ringin Estate	-		Banyuasin District –	Certified	16-Mar-12	
		Napal Estate	-		South Sumatera	Certified		
		Mangun Jaya Estate	-			Certified		890.98 ha – Still under land Legalization process.
	_	Sungai Jernih Estate	2023			Non- Certified		Sg. Jernih Estate and KKPA Was separated in 2022.

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		Rantau Mill				Certified		
		Rantau Estate	-			Certified	30-Dec-11	
	PT Laguna	Matalok Estate	-		Kotabaru District –	Certified		
11	Mandiri	Betung Mill	-		South Kalimantan	Certified		
		Betung Estate	-		Naiiiilailiaii	Certified	1-Apr-14	
		Sekayu Estate	-			Certified		
		Sekunyir Mill	-		Seruyan and	Certified	l	
	PT Indotruba	Sekunyir	-		West Kotawaringin	Certified		
12	Tengah	Seruyan Estate	-		District – Central Kalimantan	Certified	23-Nov-10	
		Selabak Mill	-			Certified		Mill was closed down and all
		Selabak Estate	-]	Certified		the supply bases was
		Randi Estate	-		Kotabaru District – South	Certified		transferred to Rantau Mill - PT Laguna Mandiri. The
13	PT Swadaya Andika	Sangkoh Estate	-			Certified	16-Mar-12	Selabak Est, Randi Est,
	Andika	Lanting Estate			Kalimantan	Certified		Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification.
		Sungai Pinang Mill	-]	Certified		
14	PT Bina Sains	Sungai Pinang Estate	2023		Musi Rawas District –	Non- Certified	11-Sep-12	Land legalisation process for
	Cemerlang	Bukit Pinang Estate	2023		- South Sumatera	Non- Certified	•	308.35 ha is still in process.
		Pemantang Mill	-		Seruyan and	Certified		
		Pemantang Estate	-		Éast	Certified		
15	PT Teguh	Kawan Batu Estate	-		Kotawaringin District –	Certified	5-Jul-11	
	Sempurna	Hatan Tiring Estate	-		Central	Certified]	
		Batang Garing Estate	-		Kalimantan	Certified		
16	PT Bhumireksa	Teluk Bakau Mill	-		Indra Giri Hilir	Certified	11-Oct-11	

Nusa Sejati	Teluk Bakau Estate	-	District – Riau	Certified		
	Nusa Lestari Estate	-		Certified		
	Nusa Perkasa Estate	-		Certified		
	Mandah Mill	-		Certified		
	Mandah Estate	-		Certified	4 0 44	
	Rotan Semelur Estate	-		Certified	1-Apr-14	

		Teluk Siak Mill	-		Certified		
	PT Aneka	Teluk Siak Estate	-	Pekanbaru,	Certified		
17	Intipersada	Pinang Sebatang Estate	-	Siak District –	Certified	11-Oct-11	
		Aneka Persada Estate	-	Riau	Certified		
		Ungkaya Mill	-	Morowali	Certified		
18	PT Tamaco Graha Krida	Ungkaya Estate	-	District – Sulawesi Tengah	Certified	10-Jul-12	
		Bukit Ajong Mill	-		Certified	18-Oct-10	
		West Estate	-	0	Certified		
19	PT SIME Indo	East Estate	-	Sanggau District –West	Certified		
	Agro	East* Estate /Sei Mawang Estate	2023	Kalimantan	Non- Certified		Land legalisation process for East Est for 5,815.64 ha is still in process.
	PT Padang	Blang Simpo Mill	-		Certified		
	Palma Permai	Tamiang (PT PPP) Estate	-	Aceh Tamiang and East Aceh	Certified		
20	PT Perkasa Subur Sakti/	Batang Ara (PT PSK) Estate	-	District – Nanggroe	Certified	3-May-13	Land legalisation process for
	PT Perkebunan	Blang Simpo-01 Estate	-	Aceh	Certified		KKPA PT PPP – Land Permit is still in process.
	Industri & Niaga Sri Kuala	Blang Simpo-02 Estate	-	Darussalam	Certified		Terriit is still in process.
		Lembiru Mill	-		Certified		PT Sandika Natapalma and PT
		Lembiru Estate	-		Certified	3-Jul-14	Budidaya Agro Lestari estates
	PT Sandika	Awatan Estate	-	Ketapang	Certified	3-Jul-14	are supplying to one mill i.e. Lembiru Mill (PT SNP).
21	Natapalma	Karya Palma Estate	2023	District – West Kalimantan	Non- Certified		Pending confirmation from BPN on HGU Document.
	PT Budidaya	Pelanjau (PT BAL) Estate	-	Ketapang	Certified	3-Jul-19	HGU obtained as per May
22	Agro Lestari	Beturus (PT BAL) Estate	2023	District – West Kalimantan	Non-		2018. However never been released by BPN.

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

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

			1	ī		
		Padipadi Estate				
		Mariawatte Estate				
		Smallholders - East Gurney Estate (259)				
		Smallholders - West Gurney Estate (231)				
		Smallholders - East Sagarai Estate (156)				
		Smallholders - West Sagarai Estate (212)				
		Poliamba Oil Mill				
		Kara Estate				
		Nalik Estate		New Ireland Province, Papua New Guinea	Certified	
	Poliamba (POL)	West Coast Estate				
3		Noatsi Estate				19-Mar-12
		Madak Estate				
		Smallholders -North Division (615)				
		Smallholders- South Division (866)				
		Smallholders -West Division (309)				
		Gusap Mill				
	Ramu Agricultrual Industries Ltd (RAIL)	Gusap East (Gusap) Estate				
		Gusap West (Paddox) Estate				
		Surinam Estate		Morobe		
4		Dumpu Estate	NA	Province,	Certified	5-Aug-10
		Ngaru Estate	-	Papua New Guinea		3 - 3 - 1
		J Estate (Jephcott) Estate		Guiriea		
		Smallholders - Madang VOPs (71)				
		Smallholders - Morobe VOPs (253)				

No	Management Unit (SOU Name)	Supply Base	Time Bound Plan	Location	Status	Certified Date
		Sangara Oil Mill	-	Oro Bay Province, Papua New Guinea		
		Mamba Oil Mill				
		Embi Estate				
		Ambogo Estate				
		Sangara Estate				
	11: 1 0:15	Sumbiripa Estate				
5	Higaturu Oil Palm (HOP)	Mamba Estate	NA -		Certified	1-Feb-13
	(HOI)	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)				
		Mosa Oil Mill				
		Kumbango Oil Mill				
		Kapiura Mill				
		Numundo Mill				10-Sep-08
		Waraston Mill		Kimbe, West		
6	West New Britain	Bebere Estate	NA	New Britain,	Certified	
	(WNB)	Kumbango Estate	_ - -	Papua New Guinea		
		Togulo Estate		G.GGG		
		Dami Estate				
		Waisisi Estate				
		Kautu Estate				

No	Management Unit (SOU Name)	Supply Base	Time Bound Plan	Location	Status	Certified Date
		Karausu 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	Erap Mill	Sep-20		Certified	Certified on 27 March 2020.
	Farming	Munum Estate	Sep-20	Markham	Certified	There is total area for NPP: 710.30 ha which is
7	Company Limited (MFCL)/Markham	Maralumi Estate	Sep-20	Farms	Certified	currently excluded from the certification scope until the NPP is approved.
	Agro Pte. Ltd.	Erap Estate	Sep-20		Certified	а а на аррготоц.

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 Bomi Estate Lofa Estate Matambo Estate Grand Cape Mount Estate	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/simedarby-plantation-completesdivestment-of-its-liberia-operations