

**Roundtable on Sustainable Palm Oil Certification  
RSPO**

**[ ] Stage-1   [ ] Stage-2   [ ] Surveillance   [✓] Re-Certification**

Name of Management Organisation : Bukit Puteri Palm Oil Mill – SOU 10, Sime Darby Plantation Sdn Bhd  
 Plantation Name : Bukit Puteri Estate – SOU 10  
 Location : K/B31, Sungai Koyan, 27650 Raub, Pahang Darul Makmur, Malaysia

Certificate Code : **MUTU-RSPO/091**  
 Date of Certificate Issue : 7 July 2016      Date of License Issue : 7 July 2017  
 Date of Certificate Expiry : 6 July 2021      Date of License Expiry : 6 July 2018

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1	25 - 28 April 2017	Sandra Purba (Lead Auditor), Mohd Nizam, Trismadi Nurbayuto	Octo H.P.N Nainggolan	Tony Arifarachman

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA - 1	6 June 2017

**TABLE OF CONTENT**

**FIGURE**

Figure 1. Location Map of SOU10, SDP	2
Figure 2. Operational Map of Bukit Puteri Estate	3
Abbreviations Used	4

**1.0 SCOPE of the CERTIFICATION ASSESSMENT**

1.1 Assessment Standard Used	5
1.2 Organisation Information	5
1.3 Type of Assessment	5
1.4 Location of Mill and Plantations	5
1.5 Description of Area Statement	5
1.6 Planting Year and Cycles	6
1.7 Description of Mill and Supply Base	6
1.8 Estimate Tonnage of Certified Product	7
1.9 Other Certifications	9
1.10 Time-Bound Plan	10

**2.0 ASSESSMENT PROCESS**

2.1 Assessment Team	14
2.2 Assessment Methodology, Assessment Process and Locations of Assessment	14
2.3 Stakeholder Consultation and Stakeholders Contacted	16
2.4 Determining Next Assessment	16

**3.0 ASSESSMENT FINDINGS**

3.1 Summary of Assessment Report of the RSPO Certification	17
3.2 Summary of Assessment Report of Supply Chain Requirement	37
3.3 Conformity Checklist of Certificate and Logo Use	42
3.4 Summary of RSPO Partial Certification	43
3.5 Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components	46
3.6 Summary of Arising Issues from Public, Management and Auditor Responses	64

**4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY**

4.1 Formal Signing of Assessment Findings	66
---	----

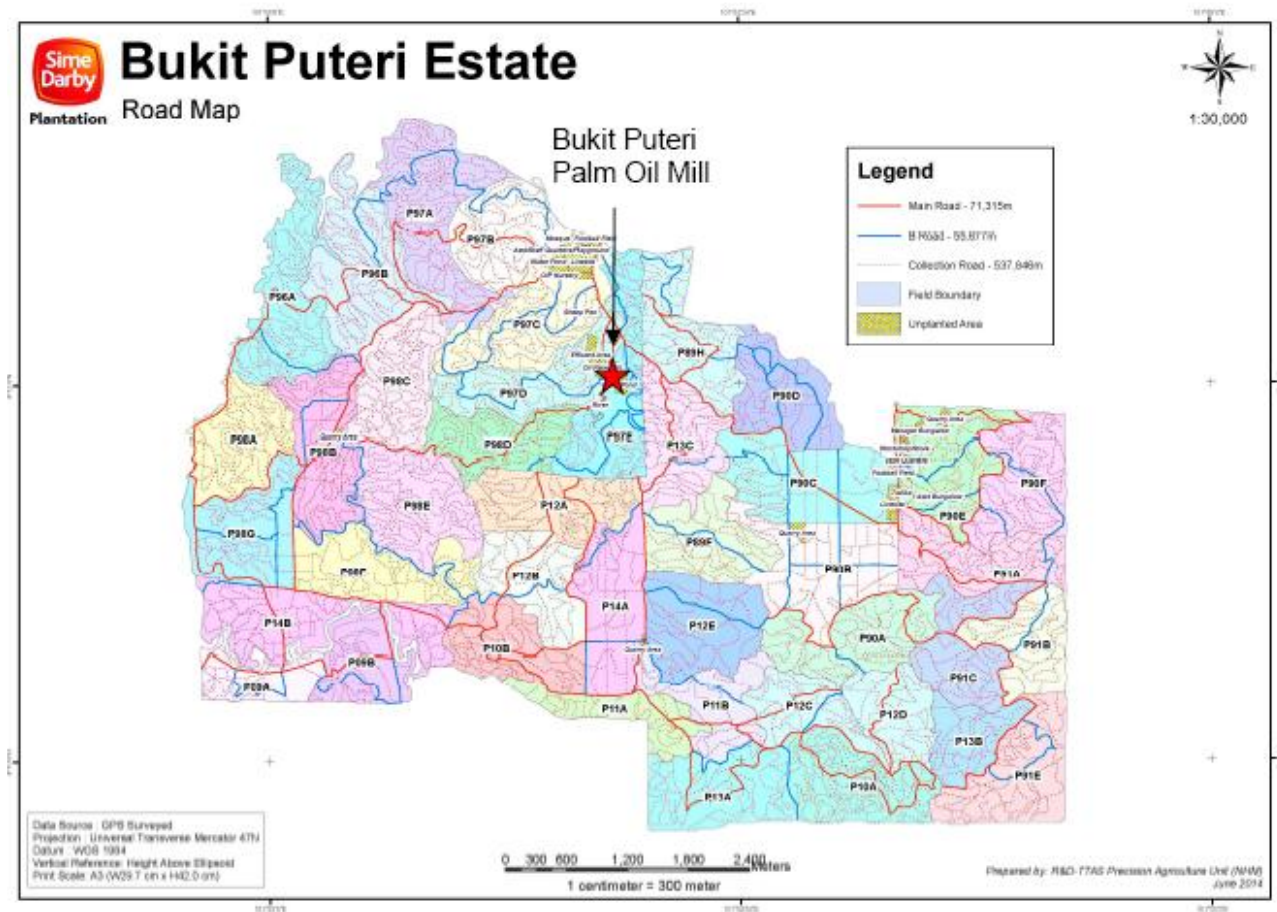
**APPENDICES**

1. List of Stakeholders Contacted in the RSPO Certification Process	67
2. Assessment Program	68

Figure 1. Location Map of SOU 10, Sime Darby Plantation sdn Bhd



Figure 2. Operational Map of Bukit Puteri Estate



**Abbreviations Used**

ARM	:	Agriculture Reference Manual
BOD	:	Biological Oxygen Demand
BTS (FFB)	:	Buah TandanSegar ( <i>Fresh Fruit Bunch</i> )
CePPOME	:	Certified Environmental Professional in the Treatment of POME
CEMS	:	Continous Emission Monitoring System
CPO	:	Crude Palm Oil
CHRA	:	Chemical Hazard Risk Assessment
CLC	:	Child Learning Centre
CSA	:	Conservation Site Area
CSR	:	Corporate Social Responsibility
COBC	:	Code of Business Conduct
COD	:	Chemical Oxygen Demand
DOE	:	Department Of Environmental
EFB	:	Empty Fruit Bunch
EMS	:	Environment Management System
EPSM	:	Environmental Protection Society Malaysia
EQMS	:	Environment Quality Management System
FY	:	Financial Year
FPIC	:	Free Prior and Informed Consent
GHG	:	Green House Gases
HCV	:	High Conservation Value
HIRAC	:	Hazard Identification and Risk Assessment Control (HIRAC)
HSE	:	Health Safety and Environment
HQ	:	Head Quarter
IUCN	:	International Union for Conservation of Nature
KER	:	Kernel Extarction Rate
KKS (POM)	:	Kilang Kelapa Sawit (Palm Oil Mill)
LC	:	Land Clearing
LCC	:	Legium Cover Crop
LOTO	:	Log Out and Take Out
LTA	:	Lost Time Accident
MPOB	:	Malaysian Palm Oil Board
MSDS	:	Material Safety Data Sheet
NCR	:	Non Conformance Report
NPP	:	New Planting Procedure
NWSDM	:	National Council of Welfare & Social Development Malaysia
NUPW	:	National Union Plantation Workers
OFI	:	Opportunity For Improvement
OHS	:	Occupational Health and Safety
OHSA	:	Occupational Health and Safety Assessment
OER	:	Oil Extarction Rate
PANAP	:	Pesticide Action Network Asia and the Pacific
PK	:	Palm Kernel
PPE	:	Personal Protective Equipment
POME	:	Palm Oil Mill Effluent
POM	:	Palm Oil Mill
PSQM	:	Plantation Services Quality Management
PSS	:	Pictorial Safety Standard

RHB	:	Rashid Husin Bank
RSPO	:	Rountable on Sustainable on Palm Oil
RTE	:	Rare, Threatened or Endangered
SDP	:	Sime Darby Plantation
SIA	:	Social Impact Assessment
SOP	:	Standard Operating Procedure
SOM	:	Standarad Operation Manual
SPMS	:	Sustainable Plantation Management System
SOCSO	:	Social Security Organization
SOU	:	Strategic Operating Unit
SW	:	Schedule Waste
TQEM	:	Total Quality Environmental Management
WTP	:	Water Treatment Plan



<b>1.0</b>	<b>SCOPE of the CERTIFICATION ASSESSMENT</b>		
<b>1.1</b>	<b>Assessment Standard Used</b>	<ul style="list-style-type: none"> <li>• Malaysia National Interpretation - RSP0 MY-NIWG of Principles and Criteria (P &amp; C) for Sustainable Palm Oil Production. Endorsed by RSP0 Board of Governors 6 March 2015.</li> <li>• RSP0 Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSP0 Board of Governors on 21 November 2014 (Module D / E for CPO Mill)</li> </ul>	
<b>1.2</b>	<b>Organisation Information</b>		
1.2.1	Organisation name listed in the certificate	Sime Darby Plantation Sdn Bhd	
1.2.2	Contact person	Shylaja Devi VasudevanNair	
1.2.3	Organisation address and site address	Head Office: Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia  Site: K/B31, Sungai Koyan, 27650 Raub, Pahang Darul Makmur, Malaysia	
1.2.4	Telephone	+(603)78484379	
1.2.5	Fax	+(603) 7848 4363	
1.2.6	E-mail	shylaja.vasudevan@simedarby.com	
1.2.7	Web page address	www.simedarby.com.my	
1.2.8	Management Representative who completed the application for certification	Shylaja Devi Vasudevan Nair	
1.2.9	Registered as RSP0 member	September 8, 2004, 1-0008-04-000-00	
<b>1.3</b>	<b>Type of Assessment</b>		
1.3.1	Scope of Assessment and Number of Management Unit	One (1) Palm Oil Mill (Bukit Puteri Mill) and one (1) supply based (Bukit Puteri Estate).	
1.3.2	Type of certificate	Single.  Date of first certificate validity was 7 July 2011 – 6 July 2016. The 2 <sup>nd</sup> cycle certificate issued by TUV Rheinland Indonesia on 7 July 2016 transferred to PT Mutuagung Lestari on 6 Maret 2017.	
<b>1.4</b>	<b>Locations of Mill and Plantation</b>		
1.4.1	Location of Mill		
	<b>Name of Mill</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	Bukit Puteri Palm Oil Mill	K/B31, Sungai Koyan, 27650 Raub, Pahang Darul Makmur, Malaysia	N 04° 12' 09"                      E 101° 51' 45"
1.4.2	Location of Certification Scope of Supply Base		
	<b>Name of Supply Base</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	Bukit Puteri Estate	K/B31, Sungai Koyan, 27650 Raub, Pahang Darul Makmur, Malaysia	N 04° 12' 40"                      E 101° 51' 40"
<b>1.5</b>	<b>Description of Area Statement</b>		
1.5.1	Tenure		

	<ul style="list-style-type: none"> <li>• Private (Freehold land title)</li> </ul>	3,875.78	Ha
	<ul style="list-style-type: none"> <li>• State</li> </ul>	N/A	Ha
	<ul style="list-style-type: none"> <li>• Community</li> </ul>	N/A	Ha
1.5.2	<b>Area Statement</b>		
	<ul style="list-style-type: none"> <li>• Total area</li> </ul>	3,875.78	Ha
	<ul style="list-style-type: none"> <li>• Mature area</li> </ul>	2,949.51	Ha
	<ul style="list-style-type: none"> <li>• Immature area</li> </ul>	850.5	Ha
	<ul style="list-style-type: none"> <li>• Mill</li> </ul>	5.39	Ha
	<ul style="list-style-type: none"> <li>• Building Site</li> </ul>	9.06	Ha
	<ul style="list-style-type: none"> <li>• Road, Housing &amp; Drainage</li> </ul>	35.90	Ha
	<ul style="list-style-type: none"> <li>• Nursery</li> </ul>	4.06	Ha
	<ul style="list-style-type: none"> <li>• HCV</li> </ul>	21.36	Ha
	<i>*HCV area are based on re-assessment report on 2016.</i>		
1.6	<b>Planting Year and Cycles</b>		
1.6.1	Age profile of planting year		
	<b>Planting Year</b>	<b>Bukit Puteri Estate</b>	<b>Total (Ha)</b>
	1989	91.64	91.64
	1990	390.3	390.3
	1996	243.44	243.44
	1997	515.44	515.44
	1998	664.58	664.58
	2009	111.77	111.77
	2010	180.57	180.57
	2011	123.3	123.3
	2012	389.41	389.41
	2013	239	239
	2014	209.69	209.69
	2015	252.04	252.04
	2016	388.83	388.83
	<b>TOTAL</b>	<b>3,800.01</b>	<b>3,800.01</b>
1.6.2	New Planting area after January 2010	-	Ha
1.6.3	Planting Cycle	2 <sup>nd</sup> Cycle	
1.7	<b>Description of Mill and Supply Base</b>		
1.7.1	Description of Mill		
	<b>Name of Mill</b>	<b>Capacity (tonnes/ hour)</b>	<b>FFB Processed (tonnes/year)</b>
			<b>CPO</b>
			<b>Out put (tonnes)</b>
			<b>Extraction (%)</b>
			<b>Palm Kernel</b>
			<b>Out put (tonnes)</b>
			<b>Extraction (%)</b>
	Bukit Puteri Mill	20	44,374.55
			9,034.66
			20.36
			2,263.10
			5.41
	<i>*Production data source from 12 months before assessment (April 2016 – March 2017)</i>		
1.7.2	Description of Certification Scope of Supply Base		
	<b>Name of Estate</b>	<b>Total Area (Ha)</b>	<b>Planted Area (Ha)</b>
			<b>FFB (tonnes/year)</b>
			<b>Yield (tonnes/ha/year)</b>
			<b>Supplied to Mill</b>
			<b>FFB</b>
			<b>%</b>



						(tonnes/year)	
	Bukit Puteri	3,875.78	3,800.01	43,649.38	11.49	43,649.38	100
	<b>TOTAL</b>	<b>3,875.78</b>	<b>3,800.01</b>	<b>43,649.38</b>	<b>11.49</b>	<b>43,649.38</b>	<b>100</b>
<i>*Production data source from 12 months before assessment (April 2016 – March 2017)</i>							
1.7.3	FFB description from other source						
	Name of sources	Organisation	Location		Supplied to Mill FFB (tonnes/year)		
	Kok Sawit	Independent FFB Supplier (Non-Certified)	Pahang, Malaysia		190.76		
	Seng Highlands Fruit Trading	Independent FFB Supplier (Non-Certified)	Pahang, Malaysia		347.63		
	Green Agro Pyramid	Independent FFB Supplier (Non-Certified)	Pahang, Malaysia		186.78		
	<b>Total</b>						<b>725.17</b>
<i>*Source Production Data on 12 months before assessment</i>							
1.7.4	Product categories		FFB, CPO, PK				
<b>1.8</b>	<b>Estimate Tonnage of Certified Product</b>						
1.8.1	Past Annual Claim Certified Product		Previous Certificate Claim 7 July 2016 – 6 July 2017 (tonnes/year)		Actual certified product 7 July 2016 – 20 April 2017 (tonnes/year)		
	<b>CPO</b>		11,702.00		7,246.36		
	<b>PK</b>		2,546.00		1,463.78		
	<b>FFB</b>		54,173.00		35,863.33		
1.8.2	Estimate of Certified FFB Claim						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Bukit Puteri	3,875.78	3,800.01	45,832	12.06		
	<b>TOTAL</b>	<b>3,875.78</b>	<b>3,800.01</b>	<b>45,832</b>	<b>12.06</b>		
<i>*Projected FFB production 12 month after assessment (7 July 2017 – 6 July 2018)</i>							
1.8.3	Estimate of Certified Palm Product Claim						
	Name of Mill	Capacity (tonnes/hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
Out put (tonnes)				Extraction (%)	Out put (tonnes)	Extraction (%)	
	Bukit Puteri Palm Oil Mill	20	45,832	9,625	21.00	2,521	5.50
<i>*Projected CSPO and CSPK 12 month after assessment (7 July 2017 – 6 July 2018)</i>							
<b>1.9</b>	<b>Other Certifications</b>						
	Others -						

1.10	Time Bound Plan					
1.10.1	Time Bound Plan for Other Management Units					
	Management Unit		Supply Base	Time Bound Plan	Location	Status
	Mill	TBP				
<b>INDONESIA</b>						
Sekunyir. PT. Indotruba Tengah	2010	Sekunyir	2010	Seruyan and West Kotawaringin District – Central Kalimantan	Certified	
		Seruyan	2010		Certified	
Manggala. PT. Tunggal Mitra Plantations	2010	Manggala 1	2010	Rokan Hilir District – Riau	Certified	
		Manggala 2	2010		Certified	
		Manggala 3	2010		Certified	
Bukit Ajong PT. Sime Indo Agro	2010	West	2010	Sanggau District – West Kalimantan	Certified	
		East	2010		Certified	
		Sei Mawang	2018		-	
		East Plasma	2010		Certified	
		West Plasma	2010		Certified	
Teluk Siak. PT Aneka Inti Persada	2011	Teluk Siak	2011	Pekanbaru, Siak District – Riau	Certified	
		Pinang Sebatang	2011		Certified	
		Aneka Persada	2011		Certified	
Sungai Pinang. PT. Bina Sains Cemerlang	2012	Sungai Pinang	2012	Musi Rawas District – South Sumatera	Certified	
		Bukit Pinang	2012		Certified	
Pemantang. PT. Teguh Sempurna	2011	Pemantang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	
		Kawan Batu	2011		Certified	
		Hatan Tiring	2011		Certified	
		Batang Garing	2011		Certified	
Alur Dumai. PT Lahan Tani Sakti	2011	Alur Dumai	2011	Rokan Hilir District – Riau	Certified	
Teluk Bakau. PT. Bhumireksa Nusa Sejati	2011	Teluk Bakau	2011	Indra Giri Hilir District – Riau	Certified	
		Nusa Perkasa	2011		Certified	
		Nusa Lestari	2011		Certified	
Mandah. PT. Bhumireksa Nusa Sejati	2014	Mandah	2011	Indra Giri Hilir District – Riau	Certified	
		Rotan Semelur	2011		Certified	
Angsana Mini. PT Sajang Heulang	2011	KKPA-1 PT.SHE	2013	Tanah Bumbu District – South Kalimantan	Certified	
		Pantai Bonati	2011		Certified	
Angsana. PT Ladangrumpun Suburabadi	2011	Angsana	2011	Tanah Bumbu District – South Kalimantan	Certified	
		Gunung Sari	2011		Certified	
		KKPA-4 PT.SHE	2013		Certified	
Mustika. PT Sajang Heulang	2013	Mustika		Tanah Bumbu District – South Kalimantan	Certified	
		KKPA-2 PT.SHE	2013		Certified	
		KKPA-3 PT.SHE	2013		Certified	
		KKPA-5 PT.SHE	2013		Certified	
		SAP 1	2020		ST-2	

Gunung Aru. PT Bersama Sejahtera Sakti	2011	Gunung Aru	2011	Kotabaru District – South Kalimantan	Certified
		Gunung Kemasan	2011		Certified
		Laut Timur	2011		Certified
		Pantai Timur	2011		Certified
		KKPA BSS	2020		-
Bebunga. PT. Langgeng Muaramakmur	2011	Sungai Cengal	2011	Kotabaru District – South Kalimantan	Certified
		Bebunga	2011		Certified
		KKPA Sungai Cengal	2014		Certified
Sukamandang PT Kridatama Lancar	2011	Sukamandang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified
		Sapiri	2011		Certified
		Barasdanum	2011		Certified
		Kuala Kuayan	2011		Certified
Pondok Labu. PT Paripurna Swakarsa	2012	Binturung	2012	Kotabaru District – South Kalimantan	Certified
		Pondok Labu	2012		Certified
		Rampa	2012		Certified
		Sesulung	2012		Certified
Selabak. PT Swadaya Andhika	2012	Selabak	2012	Kotabaru District – South Kalimantan	Certified
		Randi	2012		Certified
		Sangkoh	2012		Certified
		Lanting	2012		Certified
Rantau. PT Laguna Mandiri	2012	Rantau	2012	Kotabaru District – South Kalimantan	Certified
		Matalok	2012		Certified
Betung. PT Laguna Mandiri	2014	Betung	2012	Kotabaru District – South Kalimantan	Certified
		Sekayu	2012		Certified
Ungkaya. PT Tamaco Graha Krida	2012	Ungkaya	2012	Morowali District – Sulawesi Tengah	Certified
		Plasma TGK	2015		Certified
Ladang Panjang. PT Bahari Gembira Ria	2012	Ladang Panjang	2012	Muaro Jambi District - Jambi	Certified
		Plasma BGR	2020		-
Rantau Panjang. PT Guthrie Pecconina Indonesia	2012	Rantau Panjang	2012	Musi Banyuasin District – South Sumatera	Certified
		Bumi Ayu	2012		Certified
		Karang Ringin	2012		Certified
		Napal	2012		Certified
		Mangun Jaya	2012		Certified
		Sungai Jernih Estate and GPI KKPA	2017		-
Blang Simpo. PT Perkasa Subur Sakti	2013	Tamiang (PT PPP)	2013	Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam	Certified
		Batang Ara (PT PSK)	2013		Certified
		Blang Simpo-01	2013		Certified
		Blang Simpo-02	2013		Certified
MAS. PT Mitra Austral Sejahtera	2020	MAS 1	2018	Sanggau District – West Kalimantan	-
		MAS 1	2018		-
		MAS 1	2018		-
		Plasma MAS	2020		-

Lembiru. PT Sandika Nata Palma	2014	Lembiru	2014	Ketapang District – West Kalimantan	Certified
		Awatan	2014		Certified
		Karya Palma	2018		-
		KKPA SNP	2020		-
		Pelanjau (PT BAL)	2018		-
		Sungai Putih (PT BAL)	2018		-
		Baturus (PT BAL)	2018		-
		KKPA BAL	2020		-
<b>MALAYSIA</b>					
Sg Dingin SOU 1	2010	Bukit Hijau	2010	Kerangan, Kedah	Certified
		Padang Buluh	2010		Certified
		Bukit Selangor	2010		Certified
		Sg Dingin	2010		Certified
		Jentayu	2010		Certified
		Anak Kuli	2010		Certified
		Somme	2010		Certified
Chersonese SOU 2	2011	Chersonese	2011	Kuala Kurau, Perak	Certified
		Holyrood	2011		Certified
		Kalumpang	2011		Certified
		Tali Ayer	2011		Certified
Elphil SOU 3	2011	Kinta Kellas	2011	Sg Siput, Perak	Certified
		Elphil	2011		Certified
		Kamuning	2011		Certified
Flemington SOU 4	2011	Flemington	2011	Teluk Intan, Perak	Certified
		Bagan Datoh	2011		Certified
		Sabak Bernam	2011		Certified
		Sg Samak	2011		Certified
Seri Intan SOU 5	2011	Seri Intan (Main Division)	2011	Teluk Intan, Perak	Certified
		Sabrang	2011		Certified
		Sg Wangi	2011		Certified
		Sogomana (Main Division)	2011		Certified
Selaba SOU 5	2011	Seri Intan (Selaba Division)	2011	Teluk Intan, Perak	Certified
		Sogomana (Cashwood & Sg Beruas Division)	2011		Certified
		Bikam	2011		Certified
		Clumy	2011		Certified
Tennamaram SOU 6	2011	Tennamaram	2011	Bestari Jaya, Selangor	Certified
		Sungei Buloh	2011		Certified
		Bkt Talang	2011		Certified
Bkt Kerayong SOU 7	2011	Bkt Kerayong	2011	Kapar, Selangor	Certified
		Bkt Cherakah	2011		Certified
		Bkt Rajah	2011		Certified
		Bkt Lagong	2011		Certified
		Elmina	2011		Certified
East	2010	East	2010	Carey Island,	Certified

SOU 8		Dusun Durian	2010	Selangor	Certified
		Sepang	2010		Certified
West - SOU 9	2010	West	2010	Carey Island, Selangor	Certified
Bukit Puteri - SOU 10	2011	Bukit Puteri	2011	Raub, Pahang	Certified
Kerdau SOU 11	2011	Kerdau	2011	Temerloh, Pahang	Certified
		Jentar	2011		Certified
		Mentakab	2011		Certified
		Sg Mai	2011		Certified
		Chenor	2011		Certified
Jabor - SOU 12	2011	Jabor	2011	Kuantan, Pahang	Certified
Labu SOU 13	2011	Labu	2011	Nilai, Negeri Sembilan	Certified
		New Labu	2011		Certified
		Bradwall	2011		Certified
Tanah Merah SOU 14	2010	Tanah Merah	2010	Port Dickson, Negeri Sembilan	Certified
		Sua Betong	2010		Certified
		Bukit Pelandok	2010		Certified
Sua Betong SOU 15	2014	Salak	2014	Port Dickson, Negeri Sembilan	Certified
		Sengkang	2014		Certified
		Siliau	2014		Certified
		PD Lukut	2014		Certified
		Sungai Baru	2014		Certified
		Tampin Linggi	2014		Certified
Kok Foh SOU 16	2011	Bukit Pilah	2011	Bahau, Negeri Sembilan	Certified
		Kok Foh	2011		Certified
		Muar River	2011		Certified
		St. Helier	2011		Certified
		Pertang	2011		Certified
		Sg Gemas	2011		Certified
		Sg Sebalang	2011		Certified
		Sg Senarut	2011		Certified
Kempas SOU 17	2010	Kempas	2010	Jasin, Melaka	Certified
		Kemuning	2010		Certified
		Tangkah	2010		Certified
Diamond Jubilee SOU 18	2011	Bukit Asahan	2011	Jasin, Melaka	Certified
		Diamond Jubilee	2011		Certified
		Serkam	2011		Certified
Pagoh SOU 19	2014	Pagoh	2014	Muar, Johor	Certified
		Lanadron	2014		Certified
		Pengkalan Bukit	2014		Certified
		Welch	2014		Certified
Chaah SOU 20	2010	North Labis	2010	Chaah, Johor	Certified
		Cha'ah	2010		Certified
		Sg Simpang Kiri	2010		Certified
Gunung Mas SOU 21	2010	Gunung Mas	2010	Kluang, Johor	Certified
		Kempas Klebang	2010		Certified
		Bukit Paloh	2010		Certified
		Yong Peng	2010		Certified

Bukit Benut SOU 22	2011	Bukit Benut	2011	Kluang, Johor	Certified
		CEP Niyor	2011		Certified
		Lambak / Elaeis	2011		Certified
Ulu Remis SOU 23	2011	Pekan	2011	Layang-layang, Johor	Certified
		Sembrong	2011		Certified
		Tun Dr. Ismail	2011		Certified
		Ulu Remis	2011		Certified
		Bukit Badak	2011		Certified
		Cenas	2011		Certified
Hadapan SOU 24	2011	CEP Rengam	2011	Layang-layang, Johor	Certified
		Kulai	2011		Certified
		Layang	2011		Certified
		Seri Pulai	2011		Certified
Sandakan Bay SOU 26	2008	Tun Tan Siew Sin	2008	Sandakan, Sabah	Certified
		Tunku	2008		Certified
		Tigowis	2008		Certified
		Sentosa	2008		Certified
		Saguliud	2008		Certified
Melalap SOU 27	2011	Melalap	2011	Tenom, Sabah	Certified
		Sapong	2011		Certified
Binuang SOU 28	2009	Tingkayu	2009	Kunak, Sabah	Certified
		Sungang	2009		Certified
		Jelata Bumi	2009		Certified
		Binuang	2009		Certified
Giram SOU 29	2009	Mostyn	2009	Kunak, Sabah	Certified
		Giram	2009		Certified
Merotai SOU 30	2009	Imam	2009	Tawau, Sabah	Certified
		Merotai	2009		Certified
		Table	2009		Certified
		Tiger	2009		Certified
Lavang SOU 31	2011	Belian	2011	Bintulu, Serawak	Certified
		Kelida	2011		Certified
		Lavang	2011		Certified
		Lavang (SE)	2011		Certified
		Rasan	2011		Certified
Rajawali SOU 32	2011	Rajawali	2011	Bintulu, Serawak	Certified
		Samudera	2011		Certified
		Semarak	2011		Certified
		Bayu	2011		Certified
Derawan SOU 33	2011	Takau	2011	Bintulu, Serawak	Certified
		Damai	2011		Certified
		Derawan	2011		Certified
		Sahua	2011		Certified
Pekaka SOU 34	2011	Chartquest	2011	Bintulu, Serawak	Certified
		Dulang	2011		Certified
		Peroh	2011		Certified
		Pekaka	2011		Certified



	Ruai	2011	Certified
	<p>Sime Darby has achieved 34 management units in Malaysia and 24 Management units in Indonesia that RSPO certified. Total Management unit in Sime Darby Plantation Sdn Bhd are 34 in Malaysia, 25 in Indonesia and 1 in Liberia.</p> <p>A new mill will be set up in Liberia and planned for commissioning in Feb 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.</p> <p>There was change of the Time Bound Plan under Sime Darby on 15 April 2016 cause the Sime Darby postpone the others certification process. Change of the Time Bound Plan explanation: PT Mitra Austral Sejahtera. There are social issue still unresolved from the Serikat Petani KelapaSawit (SPKS) Sanggau, however the improvement are in progress. Sime Darby has informed the Time Bound Plan progress, MUTUAGUNG has consider that Sime Darby still comply with the RSPO requirement for partial certification.</p>		
1.10.2	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>		
	There is no associate smallholders/outgrowers supplying to Bukit Puteri mill.		

<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA-1</b>	<p><b>1. Sandra Purba (Lead Auditor).</b> Indonesian. Bachelor of Forestry, majored in Forest Product Technology, North Sumatra University. Experienced in industrial forest company, coal mining and oil palm plantations company for 6 (six) years as EHS and Sustainability Assistant. Have certified as General OHS Expert, attend and passed the several trainings of management system (OHS, environment and quality management), training of waste management, GHG verifier and validator training, conflict resolution and mapping training. Have been successfully passed the Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training course, RSPO lead auditor training course and auditor of RSPO Next. Involve in many audit activities of similar scheme (ISPO) since April 2013 covering the Legal Aspect, Environmental aspect, Social Aspect, Health and Safety Aspect, conservation and Worker Welfare. In this audit she's assessing transparency, OSH aspect, SCCS and workers welfare aspects.</p> <p><b>2. Trismadi Nurbayuto (Auditor).</b> Bachelor of Economics from the Department of Agribusiness, Faculty of Economics and Management, Bogor Agricultural University. Specialists for Environmental Social Impact Assessment (SEIA) and High Conservation Value (HCV). Has attended several training such as: HCV, Auditor for Indonesian Sustainable Palm Oil (ISPO) training, Auditor/Lead auditor Management System Certification (ISO 9001-2008), RSPO Lead Auditor training, and RSPO Next training. Previously worked in the private oil palm plantations, became HCV assessor who registered at the Roundtable on Sustainable Palm Oil (RSPO) until 2014. He has been involved in the SEIA and Identification of HCV in Plantation company. During this assessment he was observed and audit on Best Management Practices aspect, GHG and HCV</p> <p><b>3. Mohd Nizam Bin Abu Bakar (Auditor).</b> Graduated from University Malaya with a Bachelor of Sciences with Honours (Ecology). Fluent in local language and registered as a DOE environmental auditor EA 0012 and EIA consultant AC 0808. He had a 7 years experience on plantations as assistant manager at Asiatic Development Berhad. He had 21 years experience on auditing works on ISO 14000 Advanced EMS Auditing, Identifying Environmental Aspects &amp; Impacts by Sirim Training Services S/B, Environmental Assessment &amp; Management (Aberdeen, Scotland), Project Management Training Course &amp; Train the Trainer Course (MIM). During this audit he has been assigned to verify the Legal Aspect and Social Aspect.</p>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>ASA-1</b>	<p>Number of auditors : 3 auditors          Number of days for <b>ASA-1</b> at site : 4 days          Number of working days for <b>ASA-1</b> at site : 12 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA-1</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the SOU10, Sime Darby Plantation Sdn Bhd to the requirements of <b>Malaysia National Interpretation - RSPO MY-NIWG of Principles and Criteria (P &amp; C) for Sustainable Palm Oil Production and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 (Module D / E for CPO Mill).</b></p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Some opportunities for improvement of the results <b>ASA-1</b> delivered by the MUTU auditor to the Management Unit and the results are the subject will be verified at the next assessment phase (<b>ASA-2</b>).</p> <p>Improvement of findings from main assesment findings were observed by auditors at this <b>ASA-1</b> assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of <b>ASA-1</b>.</p> <p>The assessment program please find Appendix 2</p>
<b>2.2.3</b>	<b>Locations of Assessment</b>

ASA-1

**Bukit Puteri POM**

1. **Security and Weight Bridge Station.** Observastion and interview related to FFB reception and CPO/PK despatch and SCCS implementation
2. **Loading Ramp Station.** Interview related to OSH, employment and procedure and obeservation on its implementation
3. **Sterilizer, thresher, boiler, engine room, nut kernel, press.** Observation related to process, OSH and employment aspect and interview with operator related to SOP understanding, trainings and lisenec.
4. **Workshop.** Observation on OSH and environment aspect, interview with personnel related to employment aspect.
5. **Chemical storage.** Observation on OSH and environment aspect, interview with personnel related to employment aspect.
6. **Schedule waste.** Observation on OSH , environment and waste management aspect, interview with personnel related to employment aspect.
7. **Water Treatment Plant.** Observation on OSH and environment aspect, interview with personnel related to employment aspect.
8. **Effluent Pond.** Observation on OSH and environment aspect, interview with personnel related to employment aspect.

**Bukit Puteri Estate**

1. **Land fill at Block A.** Mixed waste between organic and non-organic. Segregation was not implemented
2. **Workers houses.** Clean and confortable 3 room house.
3. **SW store.** Proper storage and label
4. **Chemical store.** Proper arrangement and with MSDS
5. **Washing area.** Proper washing area with recycle containers
6. **Land preparation and Chipping activity on Field 016C.** There are mechanism land preparation and replanting activity.
7. **Pesticide Application on Field 016A.** Auditor was interview eight pesticide applicators from Nepal. According to interview they were explain: all of PPE's was provided PPE's as helm, google glass, respirator mask, apron, rubber hand gloves, and safety booth. First aid was took by mandor, with complete of contain. Ingredient active is Cypermethrin.
8. **Water catchment area on Field 97E/97D.** According to field observation, there are signage for buffer zone, spraying ban, and also there are fences around the water pond.
9. **Barn Owl Box (BOB) on Field 14C.** According to observation, this BOB was active and there are rat bonds on the lands.
10. **Harvesting on Field 90D.** There are foreigner workers from Indonesia, according to interview with workers. They can explaining about responsibilities and work instruction, and harvest criteria. According to interview with foreign workers, they has received average salary more than 1000 RM/month.
11. **Manuring on Field 09B.** There are nine foreign workers (7 Nepalese & 2 Indian). They can explain about work instruction and responsibilities, therefore all PPE's was provided by the company, if PPE's damage, it will be replaced by the company. There are regularly training every year. Based on interview with mandore, she has took first aid kit with 12 item contains.
12. **Field 90E.** Auditor was observe boundary stones coordinate 101°53'23" and 4°11'34", its boundary and *Lembaga Kemajuan Pertumbuhan Peladang*.
13. **Nursery on Field 97C.** There are Pre Nursery and Main Nursery, seedling type is Sime Darby Premium, latest culling on April 2017.
14. **Buffer zone on Field 09A/09B.** There are buffer area with secondary forest.
15. **HCV 4 Telang River on Field 09B.** There are signboard, white paint on oil palm plant as ban of spraying, and also good vegetation.
16. **Bertam River on Field 97E.** There are signboard, white paint on oil palm plant as ban of spraying, and also good vegetation.
17. **Immature area on Field 016A.** There are Legium Cover Crop with ratio *Puerera Javanica* and *Calopogonium muconoides* 3:3. There are also beneficial plant as: *Turnera subulata*, *Cassia cobanensis*, and *Antigonon leptosus*.

	<p><b>18. EFB Mulching on Field 98G.</b> There are EFB mulching with doses 200 Kg/Plants.</p> <p><b>19. Slope area more than 25°.</b> There are several oil palm was no prostrated as soil conservation.</p> <p><b>Interview with stakeholder:</b></p> <ol style="list-style-type: none"> <li>1. Engineering contractor</li> <li>2. NUPW representative (union labour)</li> <li>3. Board of Gender Committee</li> <li>4. EFB contractor</li> </ol>
<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>ASA-1</b>	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for SOU10, Sime Darby Plantation Sdn Bhd was held by:</p> <p>Public Notification on Mutu certification website</p> <p>Public consultation meeting with internal stakeholders by interviews and local stakeholders conducted by interviews during the audit on 26 April 2017 in Bukit Outri POM and 27 April 2017 in Bukit Puteri Estate</p> <p>Numbers of input from stakeholders were verified by auditors through field observation and document verification</p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	<i>Please find appendix 1</i>
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit ( <a href="#">ASA-2</a> ) will be determined one year after this <a href="#">ASA-1</a> ( <i>April 2018</i> ).

**3.0. ASSESSMENT FINDINGS**

**3.1. Summary of Assessment Report of the RSPO Certification**

MUTUAGUNG LESTARI has conducted an assessment of Bukit Puteri POM, SOU10 – Sime Darby Plantation Sdn Bhd operation consisting of one (1) mill and one (1) oil palm estate.

During the assessment, there were non nonconformities were assigned against Major Compliance Indicator and one (1) nonconformity were assigned against Minor Compliance Indicators and three (3) opportunities for improvement were identified.

Further explanation of the non-conformity raised are provided in section 3.5. The company has already prepared the corrective action(s) including analysis of root cause and preventive action that had been reviewed and accepted by Auditor(s), the effectiveness implementation will be verify in the next assessment.

MUTUAGUNG LESTARI found that Bukit Puteri POM, SOU10 – Sime Darby Plantation Sdn Bhd complied with the requirements of RSPO Principles & Criteria and National Interpretation, RSPO Principles and Criteria (P&C) for Sustainable Palm Oil Production, MYIWG .

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is **continued**.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
<b>PRINCIPLE #1 COMMITMENT TO TRANSPARENCY</b>		
<b>1.1 Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>		
<b>1.1.1</b> Available a general procedure for receiving and responding the requests of information from stakeholders describing on Estate/Mill Quality Management System (EQMS) Standard Operation Manual (SOM) Procedure for External Communication issued on 1 November 2008. The procedure states that the manager is responsible to receive all external communication from external interested parties, review and respond to the requests. Manager or assistant responsible to assign a reference number, log in the date of receipt, customer's name and address and the description of communication or complaint, and any communication with the stakeholder should be documented. Timeframes of providing feedback is within 2 weeks for requests for direct feedback and within one week for requests pertaining to investigation. During the interview with stakeholder such as local contractor mentioned that they're has been understood and aware the procedure of request of information, and stated that all information requested has been provided well. The CH has been socialized the SOP and the type of information, its also can be reached by visiting the company website.  <b>1.1.2</b> There is no request of information submitted to Bukit Puteri POM, the request to Bukit Puteri Estate recorded in commication file (OSH FILE-07), such as in/out letter and based on document verification known that there is no request of information, the letter submitted to estate is request of donation and invitation. For example letter no.: MPOB/SSCC/L011-03/2016 on 29 September 2016.		
<b>Status: Comply</b>		
<b>1.2 Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</b>		
<b>1.2.1</b>		

Stated in the procedure for external communication, clause 6.6 : all request submitted to estate/mill and from the media are to be directed to the head of corporate communication dept. The unit management can liaise directly with the media only upon receipt of written notification from the head of communication dept.

Clause 6.7 stated that the unit adopt an open mill/estate policy, whereby the mill communicate to external interested parties about its significant QHSE aspects. All visit/educational tours by external interested parties to the unit are arranged by communication Dept., or after aproval from head office are obtained. During these visit unit management arranges for **displays to be available to better explain the processes and document in the mill and estate and provide the visitor with all requested information.**

**Status: Comply**

**1.3  
Growers and millers commit to ethical conduct in all business operations and transactions.**

The company has a documented Code of Business Conduct (COBC) in the form of a booklet which lists the core values for ethical conduct, including integrity, respect and responsibility, entrepreneurship, and success. It has been socialized to the interested parties such as contractor as confirmed during the interview.

**Status: Comply**

**PRINCIPLE #2 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS**

**2.1  
There is compliance with all applicable local, national and ratified international laws and regulations.**

**2.1.1**  
Sime Darby Plantation has a standard legal and other requirements register (LORR) and updated according to financial year (F16/17). License obtained according to Mill and Estates operation such as MPOB, FMA, DOE, BOMBA, Energy Commission and PAIP.

**2.1.2**  
Documentation system describe in LORR Register tables. Documents available at HQ, Region, Mill and Estate office.

**2.1.3**  
There is a mechanism to ensure compliance was done annually through internal audit by PSQM and GCAD.

**2.1.4**  
New laws and regulations tracking was implemented via PSQM by subscribing to *law.net*.

**Status: Comply**

**2.2  
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.**

**2.2.1**  
Bukit Puteri Mill and Bukit Puteri Estate have valid land ownership under Sime Darby Plantation Sdn Bhd. Land was previously owned by LKPP, bought over by Austral Enterprise and later by Golden Hope. Trough amalgamation the property now belong to China Engineer Sdn Bhd (subsidiary of Sime Darby Plantation Sdn Bhd). Land certificates are available at each respective office. The ownership was legally done through MOA, Board Resolution on 25/4/2008. No record of contested by local observed.

**2.2.2**  
Bukit Puteri Mill and Bukit Puteri Estate were surrounded by smallholders and villages. Boundary were marked by stones and perimeter drain. Boundary stones were clearly demarcated in the field (1 number).

**2.2.3, 2.2.4, 2.2.5 & 2.2.6**  
There is no land dispute in the sampled estates as their land titles are legally identified and documented.

**Status: Comply**

**2.3  
Use of the land for oil palm does not diminish the legal rights, or customary rights, of other users, without their free, prior and informed consent.**

**2.3.1.**



The mill is located within Bukit Puteri Estate. The mill have obtained all the relevant licenses from respective authority. There is no evidence the presence of identification of legal, customary or user right. The same status applied to Bukit Puteri Estate.

**2.3.2, 2.3.3 and 2.3.4**

There is No negotiated agreement in any of the sampled estates, therefore FPIC not applicable.

**Status: Comply**

**PRINCIPLE #3 Commitment to long-term economic and financial viability**

**3.1**

**There is an implemented management plan that aims to achieve long term economic and financial viability.**

**3.1.1.**

The Company has work plan for next 5 year in the document Work Plan & Projection period 2016/17-2020/21 are made for each unit management. In the document has explained the operational area plan, the production of FFB, CPO and PK, yield/ha, extraction of CPO & PK, operational cost, environmental management and operations. In addition, the Company has a long term plan in business plan data for SOU 10 which describes the number of seeds, FFB production, OER, Production Cost, price of CPO, Revenue, replanting and CPO Production. The Company has conducted an evaluation of the estimated budget which is conducted every month. Evaluation is recorded in Performance Monitoring while the realization recorded in monthly report.

**3.1.2.**

The company has replanting program period of 2016/2017 till 2021/2022. According to document verification and field observation, there are replanting activity on Field 89F, 90A, 90B, and 91A with area 388.83 Ha. All of seed was using Sime Darby Premium.

**Status: Comply**

**PRINCIPLE #4 Use of appropriate best practices by growers and millers**

**4.1**

**Operating procedures are appropriately documented and consistently implemented and monitored.**

**4.1.1**

Quality, Environmental and Occupational Health & Safety management system developed for mill observed. Total 16 management procedures developed for the whole Quality Management System.

Different SOPs developed for relevant production section:

- Reception Station
- Fruit Handling Station
- Sterilization Station
- Threshing Station
- Pressing Station
- Clarification Station

Process flow chart for production process observed. Sufficient SOPs developed and covered whole POM processes. Controlled set of QOHSE documents observed during the mill audit. Document Master List observed for all procedures and SOPs. Safety work procedure has included on the mill processing procedure at each station. Document revision well controlled with updated version keep track. During the site observation, updated documents observed at the point of use.

Reference Manual (ARM) latest updated July 2011. Standard Operating Manual (SOM), 2018 & Standard Operating Procedure (SOP), 2008. The SOP has covered the key processes like harvesting, transportation, fertilizing, IPM, chemical handling and Manuring. Estate Quality Management System established for whole Sime Darby Plantation. Quality management manual date 1/11/2008, rev 01 observed with relevant SOP developed:

- Seed Planting
- Watering
- Spraying
- Pruning
- Manuring
- Harvesting

All the procedures were available in each Mill and Estate on English and Bahasa Melayu. Based on interview with Boiler Man in Bukit Puteri POM, he can explain regarding working safety and his job descriptions. In addition, according to interview with harvesters on Field 90D, interview with spraying workers on Field 16A, They can explain related to job descriptions and safety working environment.

**4.1.2, 4.1.3**

Internal audit conducted on yearly basis for monitoring of SOPs implementation. Daily monitoring performed by mill and estate supervisor. SOU monthly briefing performed for communication of SOPs and reminder for all employees. And also there are mechanism to check consistent implementation of procedures through internal audit by PSQM, Mill Advisor Visit and Plantation Advisor Visit. The latest Mill Advisor visit on dated 17-19 January 2017. The operation unit has follow up all of mill advisor suggestion. While the latest Plantation Advisor visit dated 21-24 March 2016, therefore Group Corporate Assurance Report (GCAD) dated 4 May 2016 for SOU 10, all of suggestion was follow up by CH.

**4.1.4.**

The company has Responsible Sourcing Guidelines revision 1 dated 23 February 2016 page 1 of 1 Guidelines for sourcing of third party Fresh Fruit Bunch (FFB). All of FFB from smallholders should be obedient to national regulation, has not convert from primary forest, peat area, HCV or conservation area after January 2010; zero burning when replanting and others. Based on document verification and interview with processing assistant manager, there are two FFB supplier as: Green Agro Pyramid Business Trading and Seng Highland Fruits Trading.

**Status: Comply**

**4.2**

**Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.**

**4.2.1**

The company has SOP Agriculture Reference Manual (2008)-Chapter 8. Manuring regarding Manuring on Immature area and Mature area. All of manuring program was monitored through Monthly Manager Report and also Agronomist Visit Report. Agronomist will be assessing the level of achievement manuring program, such as score of manuring in Bukit Puteri: 93.75 to 100 from previous manuring program.

**4.2.2.**

The fertilizer inputs record was maintained by each unit on Manuring Cost Book. There are manuring records period of July 2016-March2017. This application was linked to the agronomist report. For example, fertilizer application in Bukit Puteri Estate: October 2016: Borate: 7,508 Kg (1.00 Kg/plants); Kieserite: 341,436 Kg (0.10 Kg/plants); August-September 2016: NKC: 1,109,249 Kg (3.75 Kg/plants); January 2017: CIRP: 2.50 Kg/plants; February-Mar'17: AS: 1.50 Kg/plants; MOP: 1.50 Kg/plants. Company also has monitor the fertilizer use per ton FFB is 0.8 MT Fertilizer/MT FFB.

**4.2.3.**

Sime Darby Plantations has Sustainable Plantation Management System (SPMS) Version1 year of 2009. Soil sampling unit will conduct every 5 years, while leaf sampling unit will conduct every year by Research and Development Center Upstream. The latest soil analysis test report on 16 March 2015 by Sime Darby Research Sdn, Bhd. While last leaf

sampling unit was conducted on 27 September 2016, this sample is using for agronomic and fertilizer recommendation period of 2016/2017. For example: Fertilizer recommendation for mature area October 2016: Borate: 7,508 Kg (1.00 Kg/plants); Kieserite: 341,436 Kg (0.10 Kg/plants); August-September 2016: NKC: 1,109,249 Kg (3.75 Kg/plants); January 2017: CIRP: 2.50 Kg/plants; February-Mar'17: AS: 1.50 Kg/plants; MOP: 1.50 Kg/plants.

**4.2.4**

There are nutrient recycling strategy as: EFB mulching and palm residues from replanting. EFB application on March 2017 is 1,070,370 MT in accordance to R&D recommendation. Therefore according to field observation to 016C there are palm residues from replanting.

**Status: Comply**

**4.3**

**Practices minimize and control erosion and degradation of soils.**

**4.3.1.**

There are Soil Map with scale 1:30,000 Soil series identified for this estate includes Bungor:317.08 Ha (8.18%); Chat: 3,004.36 Ha (77.51%); Gajah Mati: 102.54 Ha (2.65%); Gol: 32.44 Ha (0.84%); Gong Chenak:101.83 Ha (2.63%); Kerayong: 39.92 Ha (1.03%); Kuah: 28.30 Ha (0.73%); Kuala Brang: 70.06 Ha (1.81%); Tebok: 179.81 Ha (4.64%).

**4.3.2.**

There are Slope Planting Policy signed by Managing Director on January 2015, Slope of >25° must be excluded from any new plantation development and replanting program. For slopes < 25 °, the existing crop and vegetation shall be maintained accordingly. Planting of forest trees for enrichment of the species is recommended. In addition there are ARM Section 3 about replanting, this procedure was explain related to ground cover management, recycling biomass, terracing and natural regeneration instead of replanting.

**4.3.3.**

The company has road grading and tipping program for 2016/2017; for example: Field 97B 88.38 Ha, it was realized on August 2016 and also March 2016. Field OP98E: 94.22 Ha, it was realized on September 2016 and March 2017. According to field observation on Field 016C, Field 90B and 90 D that known all of main road and collection road on good conditions and well maintenance.

**4.3.4; 4.3.5; 4.3.6**

According to verification of soil map, slope map, interview with each estate managers; and also based on field observation. There are no peat area is identified in all estates.

**Status: Comply**

**4.4**

**Practices maintain the quality and availability of surface and ground water.**

**4.4.1; 4.4.2.**

The company has documented guidelines on River Reserve Water Management dated April 2014 which defines procedures for protection of river riparian buffer zones including specifications on buffer zone width to be demarcated. There is evidence of implementation of an action plan to protect rivers and water bodies. The company also has document No. SD/SDP/PSQM (ESH)/263-EN 12 dated 27 March 2017 about Development, Operation & Maintenance of Estate Reservoir (DOMER). A reservoir is an artificial lake created for the purpose of water conservation by holding water in storage until is needed to meet crop irrigations requirements. An irrigation storage reservoir is designed to accumulate water during the season of low irrigation demand to fill a need during a period of high demand that might occur during that year or the subsequent year. There is a water management plan: contingency plan during water shortage for financial year 2016/2017 to identify action including the impacts on catchment area and local stakeholders, access of clean drinking water all year round for stakeholder and avoidance of surface water contamination. Based on field observation to riparian zone Sg. Bertam on Field 97E and Sg. Telang on Field 09B there are signage and white

paint on oil palm plants to avoid surface water contamination.

**4.4.3.**

For Bukit Puteri POM, there is effluent treatment pond as: one unit raw pond, two unit mixing ponds, two unit anaerobic ponds, one unit aerobic ponds. There is a monitoring report for Sg. Bertam (last point of waste water discharge) from Sime Darby Research Sdn, Bhd (accredited laboratory with Malaysia Standards SAMM No. 030) dated 14 February 2017. pH: 6.9; TDS: 260 mg/L; Turbi: 3 NTU ; Chloride: 48 mg/L; AL:-.

Monitoring parameter for BOD, COD, TSS, Total Solids, Ammoniacal Nitrogen, Total Nitrogen and O & G. The latest results 14 February 2017 showed that all parameter were below the standard limit set by DOE pH: 6.8; BOD: <1 mg/L; COD: 20 mg/L; SS: 4 mg/L; AN: <1 mg/L; DO: 4.04 mg/L; P: 0.059 mg/L. Bukit Puteri POM has obtained the license from DOE, Water Discharge License No. 004160 dated 16 May 2016 valid from 1 July 2016 till 30 June 2017 based on (Akta Kualiti Alam Sekeliling, 1974; Peraturan-Peraturan Kualiti Alam Sekeliling, 1977; Peraturan-Peraturan Kualiti Alam Sekeliling, 2014; Peraturan-Peraturan Kualiti Alam Sekeliling, 2005 junc to 2007).

**4.4.4.**

Bukit Puteri has monitor water usage for FFB processing every month. Water usage ratio budget is 1.4 M3/MT FFB; while average of water usage ratio from July 2016-March 2017 is 2.62 M3/MT FFB. The CH has been made action plan to reduce fresh water usage for FY 2016/2017. The mill consider to adjust water usage for FFB Processing according to budget. #OFI

<b>Minor 4.4.4</b>	<b>Status: OFI</b>
------------------------	--------------------

**4.5**

**Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.**

**4.5.1**

Integrated Pest Management techniques are applied according to the Sime Darby Agricultural Reference Manual which was issued on 1st July 2011, however, Section 15: Plant protection regarding Control of Rate in Oil Palm was last updated in year 2012. The updated document states that due to labour constraints, all estates are to adopt a calendar baiting approach with rat baiting campaigns carried out once every 6 months to suppress rat attacks, whether or not there is visible sign of rat damage. Additional census is only carried out when there is rat damage above the threshold level of 5%.

Rat census is done after each rat baiting campaign where rat bait is replaced after each round of census and percentage update is calculated. Once percentage uptake has gone below 20%, the rat bait application will stop. Records of the rat baiting done and percentage uptake each round is recorded in a logbook. The CH has been installed barn owl box on each estates and it has monitored every semester, for example: There are 197 BOB with occupancy: 49.74%.

Bagworm/ nettle caterpillar control is carried out according to the company's SOP as per their SDP Agriculture Reference Manual issued 1 July 2011. The SOP specifies the steps for monitoring and surveillance include alert (initial detection of signs of leaves being eaten), census stage to confirm the extent of the damage observed (sample palms at one percent level by taking one palm at every ten palms at every tenth rows and country the number and larvae and pupae on both sides of the frond) and action stage where treatment is conducted when threshold levels are exceeded, i.e. 5 live larvae per palm for large species and 10 live larvae per palm for small species. Census should then done every 2 weeks until pest census results show zero count for 3 consecutive rounds of census. According to document verification, the latest report on March 2017: there are no bagworm and nettle attack in Bukit Puteri Estate.

Ganoderma is one of plant disease was found on SOU 10, annually census has been conducted on each estate. For example latest census on July 2016: Field 97A: 0.01% from 15,557 plants; Field 97D 0.03% from 11,900 plants; Field 98D 0.05% from 8,762 plants; Field 98E 0.05% from 115,123 plants; Total: 0.0439% from 364,529 or 16 pants has been attacked.

**4.5.2**

There are IPM training records in each division such as: IPM training dated 2 September 2017 to 10 workers at Division A. According to interview with harvesters and spraying workers, there are no nettles attack, its only rinocheros beetles attack on replanting areas. In addition, according to interview with pest control team they has understood regarding to

IPM Plan as: Barn owl box, beneficial plants and others.	
	<b>Status: Comply</b>
<b>4.6</b>	
<b>Pesticides are used in ways that do not endanger health or the environment</b>	
<b>4.6.1</b>	
<p>The Company has work procedures associated with chemicals such as spraying and pest and disease control. The procedure is contained in the Pictorial Safety Standard (PSS) Chapter 8 about pesticide handling. Company is using pesticides in accordance with the target and the actual target achievement in the field is conducted three to four times a year. The pesticide has been registered in the national regulation, based on the results of field observations in Field found chemical circle weed control. The spraying activities are using pesticides that are already registered in MPOB that is active ingredient <i>cypermethrin</i> with active ingredients (a.i) of 0.646 ml / hectare to control broadleaf weeds in the circle of oil palm. During field observation to field 016B that known it was observed that spraying worker used chemical material with the active ingredient <i>cypermethrin</i>, the target is <i>Oryctes rhinoceros</i>.</p>	
<b>4.6.2.</b>	
<p>The company carries out weed control by using chemicals made in 3-4 rotations in a year. Weed controls such as circle spraying is performing selectively adapted to conditions on the field. Each of estates has been monitor pesticide usage per hectare and per FFB production. For example: average of pesticide usage on Bukit Puteri Estate is 0.058 % i.a. per hectare.</p>	
<b>4.6.3</b>	
<p>Integrated Pest Management techniques are applied according to the Sime Darby Agricultural Reference Manual which was issued on 1st July 2011, however, Section 15: Plant protection regarding Control of Rate in Oil Palm was last updated in year 2012. The updated document states that due to labour constraints, all estates are to adopt a calendar baiting approach with rat baiting campaigns carried out once every 6 months to suppress rat attacks, whether or not there is visible sign of rat damage. Additional census is only carried out when there is rat damage above the threshold level of 5%.</p> <p>Rat census is done after each rat baiting campaign where rat bait is replaced after each round of census and percentage uptake is calculated. Once percentage uptake has gone below 20%, the rat bait application will stop. Records of the rat baiting done and percentage uptake each round is recorded in a logbook. The CH has been installed barn owl box on each estates and it has monitored every semester, for example: There are 197 BOB with occupancy: 49.74%.</p> <p>Bagworm/ nettle caterpillar control is carried out according to the company's SOP as per their SDP Agriculture Reference Manual issued 1 July 2011. The SOP specifies the steps for monitoring and surveillance include alert (initial detection of signs of leaves being eaten), census stage to confirm the extent of the damage observed (sample palms at one percent level by taking one palm at every ten palms at every tenth rows and country the number and larvae and pupae on both sides of the frond) and action stage where treatment is conducted when threshold levels are exceeded, i.e. 5 live larvae per palm for large species and 10 live larvae per palm for small species. Census should then done every 2 weeks until pest census results show zero count for 3 consecutive rounds of census. According to document verification, the latest report on March 2017: there are no bagworm and nettle attack in Bukit Puteri Estate.</p> <p>Ganoderma is one of plant disease was found on SOU 10, annually census has been conducted on each estate. For example latest census on July 2016: Field 97A: 0.01% from 15,557 plants; Field 97D 0.03% from 11,900 plants; Field 98D 0.05% from 8,762 plants; Field 98E 0.05% from 115,123 plants; Total: 0.0439% from 364,529 or 16 pants has been attacked.</p>	
<b>4.6.4</b>	
<p>The Company has a complete list of pesticides that are designated by World Health Organization (WHO) Class 1A or 1B, or listed in the Stockholm or Rotterdam conventions. Based on interview with estate manager and field visit on chemical storage, Sime Darby Plantation Sdn, Bhd has been implementing zero policy of using <i>paraquat</i> since 2010.</p>	



**4.6.5; 4.6.9.**

The Company has a work procedures related to chemicals such as spraying and pest and disease control. The procedure contained in the Pictorial Safety Standard (PSS) chapter 8 about pesticide handling. Based on document verification, pesticide handling training was conducted on 27 April 2017 to 21 workers by Bayer Crop. According to interview with spraying workers, they can explain about pesticide handling and PPE's usage. However there are no available associated smallholders on this audit scope. According to field observation on pesticide application activity at Field 016 A, all of spraying workers were uses respirator mask according to MSDS. In addition that, based on interview with mandore that known pesticide mixing were conducted in chemical mixing area. And also, based on field observation to chemical mixing places near of estate office, there are adequate and safe place for chemical mixing activity.

**4.6.6; 4.6.7.**

There is a SOP Environment and Quality management system (November 2008) and Pictorial Safety Standard (PSS) Chapter 8 about Pesticide handling. Based on the field visit to Bukit Puteri Estate, there are implementation of the SOP and well organized. All Pesticides is stored according to the Color Coding (OSHA 1994). There is an evidence showing that the empty containers are properly stored at the Chemical Storage Area. Based on the site visit at field and disposal area, there is no evidence that pesticide containers are disposed and used for others purposes. Latest empty chemical containers transporting dated: 26 April 2017 with volume 1 MT.

**4.6.8.**

Based on interview with estate managers, there are no aerial spraying application during last year.

**4.6.10**

There is a standard SOP for Scheduled Waste Management. There is a proper notification to DOE by electronic submission (e-SWIS) and proper consignment note for disposal. Transportation and disposal contractor is Kualiti Alam Sdn Bhd.

**4.6.11, 4.6.12**

Medical surveillance for agrochemical applicator performed in yearly, for example the latest is checked by clinic Chung (FY2017) on 12 April 2017. The medical surveillance include those categorized as harmful such as organophosphates, trichlopyr and cypermethrin. There is no use of paraquat, as has been substitute to glyphosate. Specific health surveillance (CHE test) guidelines were for organophosphates as per requirement of DOSH Malaysia. Finding on medical surveillance mentioned in the recommendation.

Available list of pesticide operator, as many as 54 workers including storekeeper. There is no female worker who involve in chemical activity. Its consistent with field observation, there is no found any female workers on chemical spraying in Bukit Puteri Estate. They has informed the result of MCU, also confirmed that there is no indication of skin disease and itches.

**Status: Comply**

**4.7**

**An occupational health and safety plan is documented, effectively communicated and implemented.**

**4.7.1**

Sighted the OHS Policy for POM and Estates acknowledged by the Managing Director on January 2015, described the commitment to comply legal and other related requirements, provide adequate knowledge, training and experience to ensure competency with continuous improvement in the OSH Management, preventing accident, safe and healthy environment for employee. The policy written in Bahasa Melayu.

OSH program has been established in each unit as guidelines for implementation of policy, including training, OSH meeting, work place inspection, HIRARC review and incident/accident reporting.

**4.7.2**

HIRARC FY2016/2017 for mill and estate provided, covering all operational activities including non-routinely activities.



The HIRARC document has been reviewed regularly, the latest review in mill performed on 15 April 2017 due to accident occurrence and the latest review of estate HIRARC document conducted in 1 April 2017 due to accident of transporting workers. The unit added the risk and hazard, existing control, risk assessment and implementation specific to the activity after review. Based on field observation and interview with workers mentioned that the HIRARC has been well understood and displayed in each station. There is no re-occurrence of the non-conformity.

#### 4.7.3

Both estate and mill can show the OSH training program, contained in OSH program FY2016/17. Sighted record of training, for example:

- Fire drill on 14 Feb 2017 involving ERT commander, ERT Team, all staff and workers, attached the list attendance, minute and documentation (photograph).
- Spraying training by bayer crop on 25 April 2017, 21 participants
- First aid training on 28 Feb 2017, 7 participants.

Based on field visit known that the unit management has been provide the PPE to workers according to HIRARC and has been considered the precaution attached in the chemical packaging (specific to the chemical applicator). During the interview stated that the replacement has been conduct in regularly and if the PPE is broken.

#### 4.7.4

OSH committee as the responsible team in OSH aspect has been established consist of chairman, secretary, employee representative and employer representative.

OSH meeting done routinely in three monthly basis as required in Malaysian OSH Act, the latest minute of meeting can be provided:

- Mill → held on 20 March 17, 11 attendants, and the previous conduct on 23 Dec 2016.
- The latest OSH meeting of Estate done in 18 Feb 2017, 19 participants.

The meeting discussed of WPI result in last three month, accident statistic, un-safe act/condition, contractor evaluation, trainings.

#### 4.7.5

Described in Standart Operation Manual (SOM) document, appendix 5.5.3.3. version 1, year 2008, issue no.: 1 on Emergency Preparedness and Response Procedure, issued on 1 Jan 2008, covering emergency response organization structure, steps of response to an environmental and OSH emergencies including accident and incident, emergency action plan in the event of fire and emergency action plan in the event of explosion.

Accidents case which occurred in one year reported through JKPP8 template and accident by case reported through JKPP6 template (insurance claim), report submitted to Jabatan Keselamatan dan Kesihatan Pekerja (Kementerian Sumber Manusia) – Pahang. JKPP8 FY 2016 of mill reported on 21 Jan 2017 and JKPP8 of estate reported on 11 Jan 2017.

There is no report of JKPP6 in mill due to the accident occurred are minor accident and 1 JKPP6 report of estate reported on 6 April 2017, there is no claim payment because all medical treat are paid by company.

#### 4.7.6

There is no foreign workers in mill, however sighted in estate.

Local workers are covered in SOCSO insurance which paid in monthly basis, insurance payment for as many as 54 workers in mill and 82 estate workers available, for example payment on March 2017 paid through MAYBANK.

Based on interviews with management representatives known that the foreign worker is covered in RHB Insurance Berhad, valid for one year period. However, during the audit, the employee's insurance certificate or payment on behalf of Prem Kumar (Nepali), Suyanto (Indonesia) and Mohan Singh (India) which sampled by auditor not yet shown. **NCR 2017.1**

#### 4.7.7

Monitoring of accident case has been recorded using LTA metrics, the record available in both unit (mill and estate). Based on document review known that there is no lost time due to accident in mill for FY16/17 (as per March 2017) and total LTI 96 hours reported in estate (as per April 2017).

<b>Minor 4.7.6</b>	<b>Status: NCR No.: 2017.1</b>
------------------------	--------------------------------

**4.8  
All staff, workers, smallholders and contractors are appropriately trained.**

**4.8.1, 4.8.2**  
Training program were prepared in yearly, available the program FY2016/17 in both mill and estate, including the training related to RSPO P&C, such as : OSH aspect, BMP aspect, environment aspect, social aspect and worker welfare aspect. The program also covers training for contractor.  
Record of training has been maintained well, provided the minute, attendance list and documentation (photograph) for each training, as sampled below:

- Training TPM (notification form, PTW, LOTO) held on 7 March 2017, 11 mill workers
- SOU10's Fire drill on 14 Feb 2017 involving ERT commander, ERT Team, all staff and workers, attached the list attendance, minute and documentation (photograph).
- Spraying training by bayer crop on 25 April 2017, 21 participants
- First aid training on 28 Feb 2017, 7 participants.

<b>Status: Comply</b>
-----------------------

**PRINCIPLE #5 Environmental responsibility and conservation of natural resources and biodiversity**

**5.1  
Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement.**

**5.1.1**  
Mill does not involve in new planting neither replanting therefore EAI report is not related. However SIA and EAI are available and updated accordingly. Last year observation issue: storage of chemical & SW, post heater, hydro-cyclone was not included in the EAI evaluation. Bukit Puteri Estate EAI evaluation is complete covering the whole estate activities.  
Sime Darby Plantation Sdn Bhd has plan to develop New Risk Management Procedure (HIRADC & EAI). Road show in progress and expected to produce the NRMP by 31/6/2017. The new NRMP will be used for the whole company in FY 2017/2018.

**5.1.2**  
Environmental Aspect & Impact Identification (EAI) is prepared according to Mill activities. Action plan is prepared to mitigate the negative impact registered. Main impacts such as water pollution, air pollution and schedule wastes are the on-going actions taken. Bukit Puteri Estate, mitigation against negative impacts identified in EAI report was done through Environmental Management Plan (EMP). Impact registered was evaluated, suitable mitigation measures implemented with time frame included. There were evidences where EMP was implemented through scheduled waste storage and disposal record.

**5.1.3**  
Action Plan prepared is inclusive of monitoring protocol either physical notification or by scientific measurement. Improvement plan is prepared to mitigate negative impacts. Bukit Puteri Estate, there is a Pollution Preventive Management Plan prepared for 2016/17 which included action plan, person in-charge and implementation status. Monitoring protocol was undertaking by physical inspection and parameters measurement to ensure conformity.

<b>Status: Comply</b>
-----------------------

**5.2  
The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and**

**operations managed to best ensure that they are maintained and/or enhanced****5.2.1**

HCV Re-assessment Report for Pahang Zone dated March 2016 covering SOU 10 Bukit Puteri and 2 other SOUs in the Pahang region has been prepared by the PSQM Department. The names, expertise and working experience of the HCV assessment team were listed in the report including 3 team members, i.e. Team Leader with experience in wildlife conservation, forest research/management, and IMS auditing, 2nd member who is a certified SIA assessor with 3 years SIA assessment experience, and experience working with the wildlife department and in forest management, and 3rd member with a Bachelor in Plant Resource Science and Management, social worker executive for Pahang Zone and assisted in SDP's tree planting project. There are two ALS certified assessors: Nur Aida Abdul Ghani (ALS2015-19) and Nursyamini Saifullizam (ALS2015-104).

The report describes a total of 21.36 ha of HCV area identified in SOU 10: Bukit Puteri which only comprises HCV 4 area, i.e. river riparian reserves covering 17.77 ha (Telang River flowing through blocks P09A, P14C, P09B, P14B, P98F), the mill water catchment area covering 2.81 ha (block P97E) and a pond covering 0.78 ha. Some other potential HCV areas observed in Bukit Puteri estate including a stream covering 0.77 ha flowing through P97D/ P97E, palm oil mill effluent pond covering 3.42 ha at block P97D, nursery pond covering 0.37ha at P97C, sloped areas covering 19.62 ha and ex-quarry areas covering 2.18ha. All species of animals identified were listed as least concern, including White throated kingfisher (*Halcyon smyneris*), common myna (*Acridotheres tristis*), crested serpent eagle (*Spilornis cheela*), barn owl (*Tyto alba*), red jungle fowls (*Gallus gallus*), intermediate egret (*Mesophoyx intermedia*), lesser whistling duck (*Dendrocygna javanica*), wild boar (*Sus scrofa*), long –tailed macaque (*Macaca fascicularis*), leopard cat (*Prionailurus bengalensis*), common civet cat (*Paradoxurus hermaphrodites*), Malay civet (*Viverra zibetha*), common cobra (*Naja naja*) and monitor lizard (*Varanus salvator*). No threatened or endangered animal species were identified. Stakeholders meeting was conducted to several time as: 26 January 2016 with 4 villagers from Kampung RTP. Sg. Ular, Kampong Bektik, and also with 9 workers. And then with government agencies dated 29 February – 4 March 2016 (Pegawai Hutan Daerah Jerantut, Penolong Pengarah Bahagian konservasi).

**5.2.2**

HCV action plan sighted in all sampled estate for year 2016/2017, the document informing scope, objectives, programme, time frame, PIC and remark/record. For example: riparian zone (Sg. Telang) on Field 09B as below picture.

**5.2.3; 5.2.4**

According to reassessment of HCV on March 2016, there are no identified RTE species on SOU 10. However the estate has taken action in putting up signage as “No Hunting” and “No Fishing” to ensure the awareness of the border part to all the workers. There is monitoring plan and continuing efforts for the conservation of the nature area for SOU 10, the monitoring program will be conducted annually and throughout the year, any sighting or identification on new RTE species will be recorded accordingly.

**5.2.5**

According to document verification and field observation to riparian zone (Sg. Telang) and water catchment nearby mill. There are no HCV set-asides with existing local community.

<b>Status: Comply</b>	
<b>5.3 Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</b>	
<p><b>5.3.1</b> Recycled waste management is mainly on scrap iron. Collection centre is at scrap yard area and disposed by Pahang Zone area. Bukit Puteri Estate, waste registry was done for schedule waste, clinical waste and scrap iron. As for organic loading there is anew circular (New Risk (HIRADC &amp; EAI) and Waste Management Project from Head of Upstream, Sime Darby Plantation (Ref: PSQM/ESH/060/10/2016) and the Roadshow is in progress now.), however actually during the field observation at workers housing known that the domestic waste has been managed by collecting and seperate based on organic and organic and disposed to the landfill.</p> <p><b>5.3.2</b> Chemical containers fall under schedule waste code SW409. Record of inventory is available and latest update on 20/4/2017. Storage and labeling are as per the regulation. Bukit Puteri Estate, chemicals are stored according to OSHA regulation with properly label and MSDS available in the store. Contaminated containers were triple rinse and reused for chemical premix. Extra containers were punctured and disposed to Kualiti Alam.</p> <p><b>5.3.3</b> Waste management plan is available for schedule waste and scrap iron. Inventory and disposal record were available during audit session. Domestic waste is collected daily and disposed at internal dumping site, Block A at Bukit Puteri Estate. Field visit observed that recycle items such as PET bottles and aluminum cans were dumped together with organic waste There is no evidence of waste segregation between organic and non-organic being carried out. However, there is a circular on New Risk (HIRADC &amp; EAI) and Waste Management Project from Head of Upstream, Sime Darby Plantation (Ref: PSQM/ESH/060/10/2016) and the Roadshow is in progress now. SOU 10 Management Team to consider initiating waste segregation for domestic waste. #OFI</p>	
<b>Minor 5.3.3</b>	<b>Status: OFI</b>
<b>5.4 Efficiency of fossil fuel use and the use of renewable energy is optimised.</b>	
<p><b>5.4.1.</b> Management program for efficiency use of diesel/petrol observed for year 2016 &amp; 2017. The management plan implemented and monitored. Monitoring of diesel and electricity usage per tonne FFB performed in mill. On-going analysis performed and monitoring result observed. Latest diesel usage on March 2017 is 0.06 liter/MT FFB; electricity usage is 7.38 kW/MT FFB. While renewable energy usage on March 2017 is 0.47 MT Fiber&amp;Shell/MT FFB.</p>	
<b>Status: Comply</b>	
<b>5.5 Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situations, as identified in the ASEAN guidelines or other regional best practice.</b>	
<p><b>5.5.1; 5.5.2.</b> There is a SOP in Standard Operating Procedure, Section B2, Felling / Clearing &amp; Land Preparation year 2008. Environmental Management – Zero Burning Technique (The zero burning technique of land clearing basically involves felling the original stands, shredding them, and leaving the remnant in windrows or between terraces to decompose naturally. According to field observation on Field 016C, there are mechanical land preparation and chipping activity.</p>	
<b>Status: Comply</b>	
<b>5.6 Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</b>	
<p><b>5.6.1</b> There is waste identification and management waste, for example: Processing station was produce: clarification condensate, sterilizer condensate, hydrocyclone condensate, mill floor cleaning water. Treatment: phase I (oil recovery,</p>	

sludge pit, oil trap), phase II (Effluent Treatment Pond), and than dispose/discharge.

**5.6.2.**

There is a plan in Carbon Policy to reducing the carbon emissions by 40% from the 2009 levels by year 2020. There is Carbon Reduction Strategy (CRS), the objectives is to reduce from 1.06 tCO<sub>2</sub>-e / mt CPO on 2009 to 0.99 tCO<sub>2</sub>-e / mt CPO on 2015 to 2017 and 0.43 tCO<sub>2</sub>-e / mt CPO on 2017 to 2021

**5.6.3.**

The plans being implemented and monitored by water foot print concept. The Green House Gas Emissions Report has been reported to the RSPO on 25 April 2017 to Demaladevi. The company was calculate GHG emission using RSPO PalmGHG Calculator Version 3.0.1, it has been verified with the final summary of net GHG emissions as below table:

The field emission Source and Sinks

Area	tCO <sub>2</sub> e	%
<b>Emission Source</b>		
Land Conversion	32411.32	8.62
CO <sub>2</sub> Emission from fertilizer	3747.84	1
NO <sub>2</sub> Emission	2236.38	0.59
Fuel Consumption(Field)	370.75	0.1
Peat oxidation	0	0
<b>Sinks</b>		
Crop Sequestration	-30721.63	-8.17
Sequestration in Conservation Area	0	0
<b>TOTAL</b>	<b>8044.66</b>	<b>2.14</b>

Mill emission and credit

Area	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission Source</b>		
POME	8257	0.19
Fuel Consumption	14.98	0
Grid Electricity utilization	369.01	0.01
<b>Credit</b>		
Export of Excess Electricity to housing & grid	0	0
Sale of PKS	0	0
Sale of EFB	0	0
<b>Total</b>	<b>8640.99</b>	<b>0.2</b>

**Status: Comply**

**PRINCIPLE #6 Responsible consideration of employees and of individuals and communities affected by growers and mills**

**6.1**

**Aspects of plantation and mill management, including replanting, that have social impacts are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate the continuous improvement.**

**6.1.1**

There is a SIA report prepare for the whole SOU 10. SIA was conducted for the whole SOU 10 which involved only one operating units. Latest done was in September 2015 and will be reviewed in every 5 years.

**6.1.2**

SIA was done with the participation of affected community. SIA review was done in every 5 years. Community views were recorded and depicted in the SIA report.



**6.1.3**

Issues raised in SIA report were mitigated by action plan. Methodology and dateline were set to review the effectiveness.

**6.1.4**

There is an action plan prepare to monitor the effectiveness. SIA action plan has been implemented by each estate.

**6.1.5**

Impact on surrounding community such as smallholders is always the prime focus of Sime Darby Plantation. The SOP is clearly written in Social Policy. However this SOU 10 did not involve in smallholders scheme.

**Status: Comply**

**6.2**

**There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.**

**6.2.1**

Communication with local community was done through SIA stakeholder meeting, RSPO stakeholder meeting, Internal Estate communication and external community communication. Result of interviewed with stakeholders, generally expressed their satisfaction with SOU 10 management team.

**6.2.2**

Action Plan has been implemented. Official PIC is Assistant Manager with formal appointment letter. However local community can always communicate with any estates staff.

**6.2.3**

Affected stakeholders were recorded in SIA report. Follow up action was done by action plan report. PSQM and GCAD department are the monitoring team to ensure implementation.

**Status: Comply**

**6.3**

**There is a mutually agreed and documented system for dealing with complaints and grievances, which is Implemented and accepted by all affected parties.**

**6.3.1**

Estate management took serious action for complaint either by workers or local community. Interview with affected parties was conducted to express their satisfaction/dissatisfaction. Stakeholder meeting confirmed that their complaints have been entertained. Procedure/mechanism informed for complaints is hadle internally within the estate operation unit. However, the company are welcome if there is any complaint brought to the RSPO complaint system.

**6.3.2**

Internal complaint recorded by complaint book. External complaint handled by HQ or PSQM department. Upon no settling issues, legal procedures will incurred.

**Status: Comply**

**6.4**

**Any negotiations concerning compensation for loss of legal or customary rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.**

**6.4.1**

Procedures for external communication are available. However, no record of dispute with local communities occurred thus implementation evidence is not available.



**6.4.2**

This SOU 10 has never encountered land dispute issue. In other operating unit acquired was done by government or illegal settlers on Sime's land. Sime Darby used to follow government procedures.

**6.4.3**

The whole SOU 10 has never encountered conflict with surrounding local communities. There is no compensation record available. Meeting with School, NUPW and Villages depicted a positive relation.

**Status: Comply**

**6.5**

**Pay and conditions for employees and for employees of contractors always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.**

**6.5.1**

Wages payment has been carry out in accordance with applicable regulation. Definition of living wage in the country based on minimum wages order 2016, issued by Attorney Generals Chambers, for semenanjung malaysia RM 1000/month (Rm38.46/day for 6 working days per week).

Avaliable the payment list and pay receipt for monthly and daily rate, for example the payment on March 2017 informing basic pay, allowance, deduction, working days, over time, normal advances and net pay.

Based on interview with workers konwn that the workers has understood regarding to the minimum wages, premium system and picker/carrier/cutter wages which has been defined in the MAPA/NUPW document.

**6.5.2**

Employment condition describes in collective agreemennt MAPA/NUPW agreement 2015, effective date 1 April 2015, valid for three years, on wages of harvester, loaders, field and other general employees and fringe benefits agreement. The document applicable to all workers.

In addition, avaliable the direct agreement for foreign workers, written in bilingual (english and the language of the origin country), for example:

- Letter of appointment of local workers in POM, dated 10 May 2014, signed by employer and employment
- Direct contract of worker from Indonesia, passport no.: AT165587, dated 13 October 2014; worker from India, passport no.: G5633226 (26 Oct 2017); and worker from Nepal, passport no.: 07945805 dated 24 Jan 2015. The agreement describing: validity, probability period, work place, mutation, salary (based on provision of MAPA/NUPW), work time, medical, housing, foreign workers compensation scheme (insurance), work permit payment, transport allowance, rice and oil subsidy, telephone allowance, annual leaving. The contract signed by both parties and the copy delivered to workers.

During the interview with workers in mill and estate, both of local and foreign workers has had well understanding related to the agreement and letter appointment. They stated that the copy of document has been given to them. Also confirmed that the agreement were written in the language of the origin country. There is no re-occurrence of the non-conformity.

**6.5.3; 6.5.4**

Based on field visit and interview with workers known that the adequate housing, clean water supplies, medical, mosque, temple, electricity and access to adequate, sufficient and affordable food has been provided. There is no complain and grievance related to housing standard, the employee residential has been repaired, the previous is 2 bed room into 3 bed room and 2 living room.

**Status: Comply**

**6.6**

**The employer respects the right of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.**

<p><b>6.6.1</b></p> <p>Stated in Social Policy dated January 2015 which states that “The company shall respect the rights of all personnel to form and join trade unions of their choice and to bargain collectively.” Based on interview with workers in mill and estate known that the employees may freely choose to become an or not of NUPW members.</p>	
<p><b>6.6.2</b></p>	<p>The management representative stated that the appointment of NUPW's board in the unit is the authority of NUPW and without any involvement from the company. Based on interviews with NUPW board for POM and Estate mentioned that so far there is no employment issue that requires discussion with management representatives</p>
<p><b>Status: Comply</b></p>	
<p><b>6.7</b> <b>Children are not employed or exploited.</b></p>	
<p><b>6.7.1</b></p>	<p>Mentioned in the child protection policy, approved by Managing Director on Jan 2015, SDP is an advocate for the safety and well-being of children. Mentioned in the recruitment SOP no.: WMU/LR-SOPP/JAN2016/r1, minimum age is 18 years old.</p> <p>Based on employee master list in mill and estate and conformed during field visit known that there is no found any evidence of children exploitation.</p>
<p><b>Status: Comply</b></p>	
<p><b>6.8</b> <b>Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.</b></p>	
<p><b>6.8.1; 6.8.2</b></p>	<p>Stated in Social Policy, jan 2015 : The company committed to provide the fair treatment in the process of recruitment, promotion, rules and conditions of employment, based on race, nation, caste, citizenship, gender, physical form, sexual orientation, political orientation, religion and age.</p> <p>Based on employee master list in mill and estate and during field visit known that there is no found any evidence of discrimination.</p>
<p><b>6.8.3</b></p>	<p>Available the SOP of employee recruitment no.: WMU/LR-SOPP/JAN2016/r1, describes the stages of local and immigrant workers recruitment. Recruitment policies against immigrants carried out in accordance with the policies of each origin country. For example, clause 3.1.2 LR02 concern on quota application of Bangladesh and 3.1.6 LR06 concern on job order for Indonesian.</p> <p>Confirmed during the interviews and field observations, the company did not discriminate in any field such as promotion and career. For example, sighted female workers who were appointed as mandore of manuring activity in Bukit Puteri Estate.</p>
<p><b>Status: Comply</b></p>	
<p><b>6.9</b> <b>There is no harassment or abuse in the work place, and reproductive rights are protected.</b></p>	
<p>6.9.1; 6.9.2; 6.9.3</p>	<p>Gender policy approved by Managing Director on Jan 2015, mentioned that the company will comply with applicable regulations, through:</p> <ul style="list-style-type: none"> <li>✓ Preventing sexual harassment and other violence</li> <li>✓ Provide specific procedures and mechanisms</li> <li>✓ Provide adequate training</li> <li>✓ Ensuring the participation of women in decision taking</li> <li>✓ Establish the gender committee</li> <li>✓ To disseminate a policy of continuously</li> </ul> <p>In addition, available the social &amp; humanity management policy, approved by Managing Director on Jan 2015, stated</p>

that the company preventing sexual harassment and to protect their reproductive rights..

Implementation of the policy can be provided, such as:

- Available a mechanism or specific complains and grievance on Gender Committee Handbook (First Edition), specific procedure (in the form of a flowchart) in both English and Malay namely Sexual Harassment Procedure and guideline in Bahasa Malaysia titled, “*Tatacara Aduan Gangguan Seksual*” which specifies the framework for handling of sexual harassment complaints and the need to maintain the confidentiality of the complainant.
- Establishment of Gender Committee in each units (mill and estates)
- Regularly training and awareness the workers concern on policy, gender committee and specific complaint.grievance mechanism. For example, training and awareness held on 20 July 2016 participated by gender committee and female workers of estate and mill.

Available list of pesticide operator, as many as 54 workers including storekeeper. There is no female worker who involve in chemical activity. Its consistent with field observation, there is no found any female workers on chemical spraying in Estate.

**Status: Comply**

**6.10**

**Growers and mills deal fairly and transparently with smallholders and other local businesses.**

**6.10.1**

Based on list of supplier known there is no smallholder. The FFB processed by mill supplied by Bukit Puteri Estate and Green Agro. FFB price determined to MPOB, for example: License No. 54365004000 on March 2017; FFB price is 33.76/ton and inform by GMT through email in monthly basis.

**6.10.2; 6.10.3**

FFB pricing, and pricing mechanisms for FFB and inputs/services has been describes and explained in agreement. For example, agreement No. P/C/0117/FFB00762L dated 30 December 2016 between China Engineers Malaysia SDN, BHD with Green Agro Pyramid Business Tradings, mentioned that payment are made in monthly basis according to the FFB purchased by the mill.

Based on interview with FFB supplier and local contractor known that the copy of agreement has been delivered and well understood.

**6.10.4**

Sighted the payment record to contractor, such as invoice, contract form (description of work, quantity, price per unit, GST and total payment), work completion certificate and payment advice (payment receipt). Payment has been made timely according to the contract, for example : payment advice of Jasa Awah Entreprise (LC contractor) dated 7 April 2017 paid through Citibank PayLink Giro; and Invoice of Green Agro Pyramid Business Tradings No. C/AFVCH-04631 dated 31 March 2017, has been paid on March 2017 via Bank

**Status: Comply**

**6.11**

**Growers and millers contribute to local sustainable development wherever appropriate.**

**6.11.1**

Both Mill and estates in SOU 10 have record of CSR. Schools which located within the estates benefit the most. Others event such as festival and sport are regularly hold with surrounding communities.

**6.11.2**

Smallholders productivity did not related to estates. However there are small holder (OCP) that contribute FFB to Bukit Puteri Mill. Improving productivity is indirectly through FFB grading quality.

**Status: Comply**

**6.12**

**No forms of forced or trafficked labour are used.**

**6.12.1; 6.12.3**

In the SOP of employee recruitment No.: WMU/LR-SOPP/JAN2016/r1, describing the stages of recruitment of local and immigrant workers, clause 3.2.1 DP01 mentioned that the entire foreign workers should have work permit and passport. Clause 3.1.9 LR09 mentioned that the company supply new foreign workers through application of calling visa to ensure all the foreign workers being recruited legally by simedarby.

Sighted the list of work permit and passport for the entire foreign workers, including information of validity and expiry date.

The original passport can be shown to the auditor, for example:

- Indonesian Worker on behalf of Suyanto, passport no.: AT165587, valid until 22 Jul 2019 and work permit no.: PD6403221 valid until 8 October 2017
- workers from india on behalf on Mohan Singh, passport no.: G5633226 valid until 31Dec 2017 and work permit no.: PD6402098 valid until 26 Oct 2017
- Worker from Nepal on behalf of Prem Kumar, passport no.: 07945805 valid until 12 Oct 2024 and work permit no.: PD6979058 valid until 26 Jan 2018.

In the work permit mentioned that they are employed as plantation worker in Sime Darby Plantation Sdn Bhd.

Sighted form of passport hand-over between employee and employer for safety reason. Based on interview with harvester in Bukit Puteri Estate stated that the passport stored in company for safety reason, freely/not forced and can be taken at anytime for official business, emergency and annual leaving.

There is no indication of force labour, based on document review known that there is no statement of pinalties and the employee are freedom to resign. Confirmed during the interview with local workers, mentioned that there is no threat against family members (foreign workers not bring their family members).

**6.12.2**

There is no contract substitution, based on interviews with employees of immigrants from Indonesia, Nepal, Bangla and India mentioned that the current job offers in the respective countries have described the type of work and the company they work for. Interviews by agents are also accompanied by company representatives.

**Status: Comply**

**6.13**

**Growers and millers respect human rights**

**6.13.1**

Provided social & humanity management policy described that the SDP believes in developing business with a sense of humanity and do not infringe on basic human rights, approved by Managing Director on Jan 2015.

The company also as a Social Policy dated January 2015 which specifically outlines the company's practice of non-discrimination of employees (see 6.8.1).

These policies, in both English and Bahasa Malaysia were sighted at all the estates and mill and adequately displayed on the company notice boards and meeting rooms.

**6.13.2**

Not applicable, since the SOU10 located in Pahang.

**Status: Comply**

**PRINCIPLE #7 Responsible development of new plantings**

**7.1**

**A comprehensive and participatory independent social and environmental assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.**

**7.1.1**

SEIA is not prepare as there are no new planting or changes of crop such as rubber to OP.

**7.1.2**

SEIA report is not related.

7.1.3	SEIA report is not related.	
	<b>Status: Comply</b>	
7.2	<b>Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</b>	
	No new planting sighted after January 2010 as the plantation estate was established on 1989.	
	<b>Status: Comply</b>	
7.3	<b>New plantings since November 2005, have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.</b>	
	No new planting sighted after January 2010 as the plantation estate was established on 1989. Sime Darby Plantation (Malaysia) has been sent Liability and Disclosure dated 29 September 2014, all of operation unit (34 SOU) in Malaysia was zero liability.	
	<b>Status: Comply</b>	
7.4	<b>Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.</b>	
	No new planting sighted after January 2010 as the plantation estate was established on 1989	
	<b>Status: Comply</b>	
7.5	<b>No new plantings are established on local peoples' land without their free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</b>	
7.5.1	No new planting done. Replanting was done on Sime Darby Plantation own land.	
	<b>Status: Comply</b>	
7.6	<b>Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.</b>	
	7.6.1, 7.6.2, 7.6.3, 7.6.4, 7.6.5 & 7.6.6 There no compensation paid to local that are related to land acquisition. Sime Darby has not prepare a system that related to FPIC principles. Generally Sime Darby will follow government requirements or instruction.	
	<b>Status: Comply</b>	
7.7	<b>Use of fire in the preparation of new plantings is avoided other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.</b>	
	No new planting sighted after January 2010 as the plantation estate was established on 1989	
	<b>Status: Comply</b>	
7.8	<b>New plantation developments are designed to minimise net greenhouse gas emissions.</b>	
	No new planting sighted after January 2010 as the plantation estate was established on 1989	
	<b>Status: Comply</b>	

<b>PRINCIPLE #8 Commitment to continuous improvement in key areas of activity</b>	
<b>8.1 (criterion 4.6) Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.</b>	
<p><b>8.1.1</b> EAI and SIA were prepared and review every 5 years. EAI action plan is prepared to monitor and evaluate effectiveness.</p> <p>Sighted the improvement on environment aspect:</p> <ul style="list-style-type: none"> <li>- Dislodging Issues: to submit notification letter to DOE, to start dislodging process.</li> <li>- Stack sampling conducted in 6 monthly basis.</li> <li>- Water shortage/dry spell</li> <li>- Severe water pollution/contamination</li> </ul> <p>There are several continuous improvement in best agricultural practices aspect to improve the production yield as: Internal audit conducted on yearly basis for monitoring of SOPs implementation. Daily monitoring performed by mill and estate supervisor. SOU monthly briefing performed for communication of SOPs and reminder for all employees. And also there are mechanism to check consistent implementation of procedures through internal audit by PSQM, Mill Advisor Visit and Plantation Advisor Visit. The latest Mill Advisor visit on dated 17-19 January 2017. The operation unit has follow up all of mill advisor suggestion. While the latest Plantation Advisor visit dated 21-24 March 2016, therefore Group Corporate Assurance Report (GCAD) dated 4 May 2016 for SOU 10, all of suggestion was follow up by CH.</p>	
<b>Status: Comply</b>	



**3.2. Summary of Assessment Report of Supply Chain Requirement**

Clause	(Module E) CPO Mills - Mass Balance Requirements						
<b>E.1</b>	<b>Definition</b>						
<b>E.1.1</b>	<p><b>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</b></p> <p>Till the ASA-1, Bukit Puteri POM supplied by Bukit Puteri Estate and uncertified outsider, therefore SCCS requirement Module E – MB applied and the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>						
	<b>Status: Comply</b>						
<b>E.2</b>	<b>Explanation</b>						
<b>E.2.1</b>	<p><b>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&amp;C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.</b></p> <p>The estimate of CPO and PK product for lisenca year 7 July 2016 – 6 July 2017 stated in the previous certificate (issued by TUV Rheinland – cert no.: 824 502 14020), namely :</p> <ul style="list-style-type: none"> <li>✓ FFB : 54,174 MT</li> <li>✓ CPO : 11,702 MT</li> <li>✓ PK 2,546 MT</li> </ul> <p>Actual produced by the mill for period 7 July 2016 – 20 April 2017 :</p> <ul style="list-style-type: none"> <li>✓ FFB : 35,863.33 MT</li> <li>✓ CPO : 7,246.36 MT</li> <li>✓ PK : 1,463.78 MT</li> </ul> <p>There is no excess of actual certified production.</p> <p>Estimation for next year 7 July 2017 – 6 July 2018:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">FFB</td> <td align="right">45,832</td> </tr> <tr> <td>CPO</td> <td align="right">9,625</td> </tr> <tr> <td>PK</td> <td align="right">2,521</td> </tr> </table>	FFB	45,832	CPO	9,625	PK	2,521
FFB	45,832						
CPO	9,625						
PK	2,521						
	<b>Status: Comply</b>						
<b>E.2.2</b>	<p><b>The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</b></p> <p>Bukit Puteri POM has been registered and implemented the requirement for the appropriate SC through RSPO IT Platform member registration number, as below:</p> <ul style="list-style-type: none"> <li>✓ Member ID : RSPO_PO1000000192</li> <li>✓ Sub license IS : CB42770</li> </ul>						

✓ Type : CPO and PK

**Certified CPO despatched to therefinery under SDP group (Refinery Jomalina Sime Darby Sdn Bhd) period of 7 July 2016 – 6 July 2017**

Date	Buyer	Volume
Sept 2016	Refinery Jomalina Sime Darby Sdn Bhd	309.54
Nov-16	Refinery Jomalina Sime Darby Sdn Bhd	249.35
Jan-17	Refinery Jomalina Sime Darby Sdn Bhd	269.40
Feb-17	Refinery Jomalina Sime Darby Sdn Bhd	329.66
<b>Total</b>		<b>1157.95</b>

Based on document verification namely weighbridge ticket and mass-balance record known that Bukit Puteri POM despatch the CSPO since 7 July 2016 – 20 April 2017 amount of 1157.95 MT to Refinery Jomalina Sime Darby Sdn Bhd, whereas in the e-trace transaction record till 25 April 2017 there is no CSPO sales. Its due to all delivery of CPO and PK shall be in accordance with contract allocated by Global Trading & Marketing Department (mentione in SOP clause 9.1) and mentioned that the entire CSPO despatch to the refinery under SDP shall recapitulated by GMT and announced to the RSPO prior to the end date of license. It's also has been described in SOP Sustainability Supply chain and treceability clause 9.4.

**There is no sales of certified PK during period of 7 July 2016 – 20 April 2017**

**Status: Comply**

**E.3 Documented procedures**

**E.3.1**

**The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:**

- a. Complete and up to date procedures covering the implementation of all the elements in these requirements;**
- b. The name 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 site procedures for the implementation of this standard.**

SOP for sustainability supply chain and treceability can be shown on sustainability plantation management system appendix 15, version 2, year 2016, issue no.: 1, date March 2016.

Scope of SOP for handling FFB, CPO and PK certified.

Responsibility

- The head of operating unit shall have to overall responsibility for the implementation of the SOP
- MR appointed the personnel in each critical control point such as Head of Operating Unit, ESHMR, Quality Assurance, Weighbridge Operator, Administration Office, Ramp, CPO despatch, CPO storage tank and kernel silo

On clause 9.0, stated that the outgoing document for CPO and PK shall specify the information for certified oil plant products, such as trade name according to the material category (RSPO IP / MB) or RSPO certificate number.

Training of the SOP to the CCP personnel held on 20 April 2017, for 12 attendants.

**Status: Comply**

**E.3.2**

**The site shall have documented procedures for receiving and processing certified and non-certified FFBs.**

SOP for sustainability supply chain and traceability can be shown on sustainability plantation management system appendix 15, version 2, year 2016, issue no.: 1, date March 2016.

Scope of SOP for handling FFB, CPO and PK certified.

Clause 7.0 describing on receiving FFB at the mill:

- Mill shall receive from pre-determined supplying estates as per list of supply base and crop diversion for SOUs
- Mill shall display the list of certified FFB suppliers (with certificate number and validity period) at the weighbridge station. This also applies to certified third suppliers
- Mill shall maintain records of volume of certified and non-certified FFB received.

Observed that the SAP of Bukit Puteri POMI has been established the list of certified supplier in the coding system, for example Bumi Putra Estate Code : E297.

The document of FFB receive can be shown, for example :

- FFB consignee and weighbridge ticket of outsider (non-certified)



- FFB consignee and ticket of certified supplier (Bukit Puteri Estate)



**Status: Comply**

**E.4 Purchasing and goods in**

**E.4.1**

**The site shall verify and document the volumes of certified and non-certified FFBs received.**

Bukit Puteri Mill has been verify certified and non-certified FFB received period of 7 July 2016 – 6 July 2017, as describes on the table below:

Date	FFB Received from	FFB Received from
------	-------------------	-------------------

	Certified Sources (total per month), MT	Non-certified Sources (total per month), MT	Total, MT
31-Jul-16	3,429.46	0.00	3,429.46
31-Aug-16	4,182.86	0.00	4,182.86
30-Sep-16	3,736.63	0.00	3,736.63
<b>Quarterly Total</b>	<b>11,348.95</b>	<b>0.00</b>	11,348.95
31-Oct-16	3,447.57	63.11	3,510.68
30-Nov-16	3,760.75	75.04	3,835.79
31-Dec-16	3,558.72	339.99	3,898.71
<b>Quarterly Total</b>	<b>10,767.04</b>	<b>478.14</b>	11,245.18
31-Jan-17	2,846.65	102.44	2,949.09
28-Feb-17	2,748.03	60.99	2,809.02
31-Mar-17	4,177.69	83.60	4,261.29
<b>Quarterly Total</b>	<b>9,772.37</b>	<b>247.03</b>	10,019.40
20-Apr-17	3,974.97	102.19	4,077.16
<b>Quarterly Total</b>	<b>3,974.97</b>	<b>102.19</b>	4,077.16
<b>Grand Total</b>	<b>35,863.33</b>	<b>827.36</b>	<b>36,690.69</b>

**Status: Comply**

**E.4.2**

**The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.**

The estimate of CPO and PK product for lisencc year 7 July 2016 – 6 July 2017 stated in the previous certificate (issued by TUV Rheinland – cert no.: 824 502 14020), namely :

Projection for 7 July 2016 – 6 July 2017	Actual production (7 July 2016 – 20 April 2017)
FFB : 54174 MT	FFB : 35,863.33 MT
CPO : 11702 MT	CPO : 7,246.36 MT
PK : 2546 MT	PK : 1,463.78 MT

There is no exceded of actual certified production.

**Status: Comply**

**E.5**

**Record keeping**

**E.5.1**

- The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.
- All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.
- The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)

The record of certified FFB receipts, CPO and PK despach has been done in three monthly basis, as table below:

**CSP0**

Date	FFB Received from Certified Sources (total per month), MT	FFB Received from Non-certified Sources (total per month), MT	Total, MT	Total CPO Produced, MT	Total CSPO Produced, MT	CPO dispatched as RSP0 Certified Sustainable from mill (total per month), MT		CPO Stock Balance
						Certified	Non-Certified	
31-Jul-16	3,429.46	0.00	3,429.46	709.32	709.32	0.00	618.59	709.32
31-Aug-16	4,182.86	0.00	4,182.86	886.04	886.04	0.00	889.31	1,595.36
30-Sep-16	3,736.63	0.00	3,736.63	771.54	771.54	309.54	540.50	2,057.36
<b>Quarterly Total</b>	<b>11,348.95</b>	<b>0.00</b>	11,348.95		<b>2,366.90</b>	<b>309.54</b>	<b>2,048.40</b>	
31-Oct-16	3,447.57	63.11	3,510.68	742.46	729.11	0.00	654.60	2,786.47
30-Nov-16	3,760.75	75.04	3,835.79	773.48	758.35	249.35	598.06	3,295.47
31-Dec-16	3,558.72	339.99	3,898.71	774.49	706.95	0.00	808.88	4,002.42
<b>Quarterly Total</b>	<b>10,767.04</b>	<b>478.14</b>	11,245.18		<b>2,194.41</b>	<b>249.35</b>	<b>2,061.54</b>	
31-Jan-17	2,846.65	102.44	2,949.09	582.63	562.39	269.40	154.16	4,295.41
28-Feb-17	2,748.03	60.99	2,809.02	562.25	550.04	329.66	171.23	220.38
31-Mar-17	4,177.69	83.60	4,261.29	818.72	802.66	0.00	963.20	5,098.07
<b>Quarterly Total</b>	<b>9,772.37</b>	<b>247.03</b>	10,019.40		<b>1,915.09</b>	<b>599.06</b>	<b>1,288.59</b>	
20-Apr-17	3,974.97	102.19	4,077.16	789.75	769.95	0.00	731.00	5,868.02
<b>Quarterly Total</b>	<b>3,974.97</b>	<b>102.19</b>	4,077.16		<b>769.95</b>	<b>0.00</b>		

**CSPK**

Date	FFB Received from Certified Sources (total per month), MT	FFB Received from Non-certified Sources (total per month), MT	Total PK Produced	Total CSPK Produced	PK dispatch as RSP0 Certified Sustainable from Mill (total per month), MT		CSPK Balance stock
					Certified	Non-Certified	
31-Jul-16	3,429.46	0.00	112.58	112.58		121.29	112.58
31-Aug-16	4,182.86	0.00	167.49	167.49		154.35	280.07
30-Sep-16	3,736.63	0.00	160.14	160.14		150.70	440.21
<b>Quarterly Total</b>	<b>11,348.95</b>	<b>0.00</b>	<b>440.21</b>	<b>440.21</b>	<b>0.00</b>	<b>426.34</b>	
31-Oct-16	3,447.57	63.11	132.52	130.14		179.43	570.35
30-Nov-16	3,760.75	75.04	149.65	146.72		117.30	717.07
31-Dec-16	3,558.72	339.99	152.92	139.59		146.26	856.66
<b>Quarterly Total</b>	<b>10,767.04</b>	<b>478.14</b>	<b>435.09</b>	<b>416.45</b>	<b>0.00</b>	<b>442.99</b>	
31-Jan-17	2,846.65	102.44	127.14	122.72		88.63	979.38
28-Feb-17	2,748.03	60.99	92.39	90.38		77.04	90.38
31-Mar-17	4,177.69	83.60	186.93	183.26		166.74	1,162.64
<b>Quarterly Total</b>	<b>9,772.37</b>	<b>247.03</b>	<b>406.46</b>	<b>396.37</b>	<b>0.00</b>	<b>332.41</b>	
20-Apr-17	3,974.97	102.19	216.17	210.76		176.10	1,373.40
<b>Quarterly Total</b>	<b>3,974.97</b>	<b>102.19</b>	<b>216.17</b>	<b>210.76</b>	<b>0.00</b>		

All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSP0 and the mill only deliver Mass Balance sales from a positive stock

	<b>Status: Comply</b>
<p><b>E.5.2</b>  <b>In cases where a mill outsources activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.</b></p> <p>Bukit Puteri POM not hire outside palm kernel crusher.</p>	
	<b>Status: Comply</b>



**3.3. Conformity Checklist of Certificate and Logo Use** *(Only apply for Surveillance Assessment Report)*

<b>1.</b>	<b>Evidence of permission or approval certificate and logo from Certification Body which submitted by Client</b>	<b>X or√</b>
<b>ASA-1</b>	Bukit Puteri POM – SOU10 not use RSPO logo	√
	<b>Status: Comply</b>	
<b>2.</b>	<b>Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use</b>	<b>X or√</b>
<b>ASA-1</b>	Bukit Puteri POM – SOU10 not use RSPO logo	√
	<b>Status: Comply</b>	
<b>3.</b>	<b>Implementation of Certificate and Logo is not used on product</b>	<b>X or√</b>
<b>ASA-1</b>	Bukit Puteri POM – SOU10 not use RSPO logo	√
	<b>Status: Comply</b>	
<b>4.</b>	<b>Controlling of Certificate and Logo, including withdrawing inappropriate logo.</b>	<b>X or√</b>
<b>ASA-1</b>	Bukit Puteri POM – SOU10 not use RSPO logo	√
	<b>Status: Compy</b>	

**3.4. Summary of RSPO Partial Certification.**

Compliance of the uncertified Management Units of Sime Darby Plantation Sdn Bhd against the rules for partial certification was determined through Self-Assessment in accordance with RSPO Certification System clause 4.2.4. A summary of findings is as stated below

Sime Darby Plantation Sdn Bhd Time Bound Plan is explained in table section 1.10. Sime Darby has achieved 34 management units in Malaysia and 24 Management Units in Indonesia that RSPO certified. Total Management Units in Sime Darby Plantation Sdn Bhd are 34 in Malaysia, 25 in Indonesia and 1 in Liberia. Sime Darby Plantation Sdn Bhd has informed the Time Bound Plan progress through representative’s office in Indonesia. MUTU has considered that Sime Darby Plantation Sdn Bhd is comply with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by the Sime Darby Plantation Sdn Bhd Indonesian representative on June 16th, 2016 by the Head of PSQM.

MUTU has verified partial certification for un-certified unit’s subsidiary of Sime Darby Plantation Sdn Bhd based on their Time Bound Plan. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There are significant land conflicts in PT Mitra Austral Sejahtera, there is still an issue that remain unresolved social i.e. from Serikat Petani Kelapa Sawit (SPKS), but improvements are ongoing.
- PT Budidaya Agro Lestari waiting for land title process.
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p><b>Company Group/Holding Statement:</b> Companies are already doing internal audits. There are internal audit reports for each company.</p> <p><b>Auditor Verification:</b> Internal Audit report available for uncertified Management Units for example PT Sandika Natapalma – Karya Palma Estate on 10 February 2017.</p>
2.2.2	No replacement after dates defined in NIs Criterion 7.3 of: <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area identified as containing High Conservation Values (HCVs).</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3.</li> </ul>	<p><b>Company Group/Holding Statement:</b> HCV assessment has been conducted for uncertified units i.e. PT Mitra Austral Sejahtera (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p> <p><b>Auditor Verification:</b> Sime Darby Plantation Sdn Bhd sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2<sup>nd</sup> revision on 24 June 2016. The companies ensuring reporting of disclosure of liability</p>

		progress to RSPO and according to the CB's correspondency with RSPO Remediation and Compensation.
2.2.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p><b>Company Group/Holding Statement:</b>  A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.  *Note: RSPO NPP Announcements for SDP can be found at <a href="http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14">http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14</a></p> <p><b>Auditor Verification:</b></p> <ul style="list-style-type: none"> <li>• Karya Palma Estate (PT Sandika Natapalma) and Baturus Estate (PT Budidaya Agro Lestari) any new planting after January 1<sup>st</sup> 2010 and due to not conduct NPP.</li> <li>• RSPO NPP process has been completed in 2011 for a new mill in Liberia.</li> </ul>
2.2.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p><b>Company Group/Holding Statement:</b>  Sime Darby (Liberia) Plantation Inc.  Status: Box G - Close for Monitoring  Further details please refer to: <a href="http://www.rspo.org/members/complaints/status-of-complaints/view/46">http://www.rspo.org/members/complaints/status-of-complaints/view/46</a>  PT Mitra Austral Sejahtera (Sime Darby Sdn Bhd)  Further details please refer to: <a href="http://www.rspo.org/members/complaints/status-of-complaints/view/29">http://www.rspo.org/members/complaints/status-of-complaints/view/29</a></p> <p><b>Auditor Verification:</b>  Auditor has verified the supporting evidence of above the company statement.  There are land conflict in :</p> <ul style="list-style-type: none"> <li>• PT Mitra Austral Sejahtera, this issue are remain being resolved with RSPO dispute settlement facilities</li> </ul> <p>PT Bina Sains Cemerlang, this issue was raise on 22 April 2017 and still being process to resolve.</p>
2.2.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p><b>Company Group/Holding Statement:</b>  No stakeholder comments or complaints received.</p> <p><b>Auditor Verification:</b></p>

		Auditor has verified the supporting evidence of above the company statement. There are no labour dispute in company unit.
2.2.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p><b>Company Group/Holding Statement:</b> None noted. No stakeholder comments or complaints received.</p> <p><b>Auditor Verification:</b> Auditor has verified the supporting evidence of above the company statement. There is any legal non-compliance for PT Budidaya Agro Lestari waiting for land title process.</p>

**3.5 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.**

**3.5.1 Identification of Findings, Corrective Actions and Observations at Re-cert Assessment**

<b>NCR No.</b>	: RSP000660	<b>Issued by</b>	: TUV Rheinland
<b>Date Issued</b>	: 14 May 2016	<b>Time Limit</b>	: Prior to certificate issuance
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 22 July 2016
<b>Standard Ref. &amp; Requirement</b>	: 2.1.1 Evidence of compliance with relevant legal requirements shall be available.		
<b>Non-Conformance Description &amp; Evidence observed</b> (filled by auditor)			
Mill: There are mill workers, e.g. Rohazimi (Process A) worked a total of 11 hours (0723am-0232am); Abdul Fatah (Process A), 9hrs (6-7 July 2015), exceeding the maximum 12 hour shift requirement as stipulated in the Employment Act 1955 (Section 60C(2)).			
<b>Root Cause Analysis</b> (filled by organization audited):			
Noted that working hours exceeding 12 hours/day due to FFB process and run process for only one shift.			
<b>Corrective Action</b> (filled by organization audited):			
To request permit from Jabatan Tenaga Kerja for working exceed 12 hours/day. It will be ensured that workers do not exceed the maximum 12-hour shift requirement until permit is received. Supervisor is a person in-charge to ensure the working hours is not exceeding on the shift requirement.			
<b>Preventive Action</b> (filled by organization audited):			
All the mill workers working hour shall to monitor closely by the supervisor and checkroll clerk. PIC: Supervisor			
<b>Assessor Evaluation and Conclusion</b> (filled by auditor):			
<b>Verification result:</b>			
Mill has submitted letter of application for overtime over more than 12 hours per day to the Labour Department of Raub as per letter dated 21 June 2016 and stamped received by JTK Raub on 29 June 2016. Checked from Clerical staff input sheets, there are still records of worker working over the 12 hours shift requirement, e.g.:			
<ul style="list-style-type: none"> <li>✓ Worker named Rusni bin Suratman (Mill supervisor) who worked overtime (OT) for 8 hours on 15 July. Reason stated in 'Overtime Details' form was to work early to process.</li> <li>✓ Worker named Nik Mohd Fadzli Nik Mustapha (Boiler fireman) who worked OT for 10 hours on 13 &amp; 14 July and 9.5 hours each on 15 &amp; 16 July. Reason stated in 'Overtime details' form was process. Further investigation showed that he was covering for another boiler-man who had resigned.</li> </ul>			
However it was explained by the mill that this was due to shortage of manpower and there is evidence that mill is taking measures to resolve the issue of excessive overtime by hiring more people as seen from memo regarding open interviews for several positions, i.e. store attendant, boiler man and charge man that was held on 26 May 2016 and record of job application forms from potential candidates.			
<b>Auditor Conclusions: Closed with observations</b>			
<b>Verified by</b>	: TUV Rheinland		

<b>NCR No.</b>	: RSP000661	<b>Issued by</b>	: TUV Rheinland
<b>Date Issued</b>	: 14 May 2016	<b>Time Limit</b>	: ASA-1
<b>NC Grade</b>	: Minor	<b>Date of Closing</b>	: 18 July 2016
<b>Standard Ref. &amp;</b>	: 2.1.2		

<b>Requirement</b>	<b>A documented system, which includes written information on legal requirements, shall be maintained.</b>
<b>Non-Conformance Description &amp; Evidence observed (filled by auditor)</b>	
<p>Documented system of LORR for Bukit Puteri Mill and Bukit Puteri Estate was found not properly updated as it was not detailed enough to explained the actual legal requirements such as:</p> <ul style="list-style-type: none"> <li>a) OSHA 1994, only mentioned Part VI, whereas Sections 24-27 and the specific clauses under these sections was not listed. Clauses under General Duties of Employer and Self-Employed Persons under Section 15 and Section 28 on requirement of medical surveillance were not included and explained.</li> <li>b) Occupational Safety and Health (Classification, Packaging and Labelling) Regulations is obsolete but still not removed, while Occupational Safety and Health (CLASS) Regulations 2013 was not included in the LORR (Mill only)</li> <li>c) Factories and Machinery (Safety, Health and Welfare) Regulations 1983, only states to refer to the FMA regulations for specific details, instead of listing the details of the relevant regulations.</li> <li>d) Environmental Quality Act 1974 was found not including Section 22 Restriction on pollution of atmosphere, Section 23, Restriction on noise pollution. While Section 29 was stated as Restriction of Open Burning, but it is actually pertaining to Prohibition of discharge of waste into Malaysian waters (not applicable). While Section 29A is actually regarding prohibition of open burning (numbering of the section is incorrect).</li> <li>e) The amendment of Factories and Machinery (Person In-charge) (Amend) Regulations 2014 was not included in the LORR.</li> <li>f) Environmental Quality (Clean Air) Regulations 2014 still not in the LORR (Bukit Puteri Mill).</li> <li>g) Pesticides (Labelling) Regulations 1989 was not included in the LORR.</li> </ul>	
<b>Root Cause Analysis (filled by organization audited):</b>	
<p>Adaptation of LORR from a generic format for all operating units throughout the company was practiced. The present mechanism of updating the LORR was not effective where it was not done at a strategic (group) level nor had experts equipped specifically with knowledge on laws and legislations. There was also no specific contact point between the Group and Plantation Division regarding updates on the legislations.</p>	
<b>Corrective Action (filled by organization audited):</b>	
<p>PSQM to amend the specific section mentioned in the LORR based on the current update. The updated section will then be circulated to Mill and Estates. (PIC: PSQM RSPO Unit and ESH Unit</p>	
<b>Preventive Action (filled by organization audited):</b>	
<p>Updating of laws and legislations is now under the purview of Group Compliance. All updates will be disseminated to PSQM through the ESH Unit. The relevant updates will be further informed to the Estates and Mills by PSQM for the Oust inclusion in their respective LORR. Corresponding training on the implementation will also be carried out. PIC: PSQM RSPO Unit , ESH Unit &amp; Group Compliance Office</p>	
<b>Assessor Evaluation and Conclusion (filled by auditor):</b>	
<p>The company provided an updated LORR for Bukit Puteri Mill and Estate which now incorporates the missing details of legal requirements as listed above. <b>Auditor Conclusions: Closed</b></p>	
<b>Verified by</b>	<b>: TUV Rheinland</b>

<b>NCR No.</b>	<b>: RSPO00663</b>	<b>Issued by</b>	<b>: TUV Rheinland</b>
<b>Date Issued</b>	<b>: 14 May 2016</b>	<b>Time Limit</b>	<b>: ASA-1</b>
<b>NC Grade</b>	<b>: Minor</b>	<b>Date of Closing</b>	<b>: 18 July 2016</b>
<b>Standard Ref. &amp; Requirement</b>	<b>: 2.1.3 A mechanism for ensuring compliance shall be implemented.</b>		



**Non-Conformance Description & Evidence observed (filled by auditor)**

Found mechanism to ensure compliance was not effectively applied at Bukit Puteri Mill and Bukit Puteri Estate where the compliance score was stated 100% for year 2015/2016 at estate, and 97% compliance at the mill. In actual found inconsistency of compliance issues such as:

- a) Evaluation of compliance done on Occupational Safety and health Act 1994 and Environmental Quality Act 1974 were not properly conducted due to missing sections in the LORR.
- b) No evaluation of compliance was done on Factories and Machinery (Person In-Charge) Regulations 2014.
- c) No evaluation of compliance done for Pesticides (labelling) Regulations 1984 as it was not included in the LORR.

Environmental Quality (Refrigerant Management) Regulations 1999, was not evaluated on compliance status and mentioned as not applicable, although it is applicable.

**Root Cause Analysis (filled by organization audited):**

Adaptation of LORR from a generic format for all operating units throughout the company was practiced. The present mechanism of updating the LORR was not effective where it was not done at a strategic (group) level nor had experts equipped specifically with knowledge on laws and legislations. There was also no specific contact point between the Group and Plantation Division regarding updates on the legislations

**Corrective Action (filled by organization audited):**

PSQM to amend the specific section mentioned in the LORR based on the current update. The updated section will then be circulated to Mill and Estates. (PIC: PSQM RSPO Unit and ESH Unit

**Preventive Action (filled by organization audited):**

Updating of laws and legislations is now under the purview of Group Compliance. All updates will be disseminated to PSQM through the ESH Unit. The relevant updates will be further informed to the Estates and Mills by PSQM for the out inclusion in their respective LORR. Corresponding training on the implementation will also be carried out. PIC: PSQM RSPO Unit , ESH Unit & Group Compliance Office

**Assessor Evaluation and Conclusion (filled by auditor):**

**Verification result:**

The company provided an updated LORR for Bukit Puteri Mill and Estate which now incorporates the missing details of legal requirements and also evaluation of compliance was done. Currently the LORR indicates compliance to all legal requirements. Effectiveness of evaluation done against the actual condition will be verified during the next surveillance audit.

**Auditor Conclusions: Evidence of immediate action taken was accepted. Effectiveness of implementation to verified at next audit.**

**Verified by** : TUV Rheinland

<b>NCR No.</b>	: RSPO00664	<b>Issued by</b>	: TUV Rheinland
<b>Date Issued</b>	: 14 May 2016	<b>Time Limit</b>	: ASA-1
<b>NC Grade</b>	: Minor	<b>Date of Closing</b>	: 27 April 2017
<b>Standard Ref. &amp; Requirement</b>	: 4.4.1 An implemented water management plan shall be in place.		

**Non-Conformance Description & Evidence observed (filled by auditor)**

The company has documented guidelines for River Reserve Water Management dated April 2014 specifies that water sampling shall be conducted for water bodies designated for operational use such as domestic consumption, however, there is no specification in this document or any other SOP on how such water bodies are to be protected to ensure the water quality is well maintained, e.g. protection from chemical contamination.

<b>Root Cause Analysis</b> (filled by organization audited): Mentions of water bodies were made in section 3.2 of the Guidelines on River Reserve Management where the intention of the guideline was not only for rivers but also for any other water body. However, the description could be improved to avoid misinterpretation.	
<b>Corrective Action</b> (filled by organization audited): To revise the Guidelines on River Reserve Management and elaborate further on the inclusion of other water bodies	
<b>Preventive Action</b> (filled by organization audited): Subsequent to the revision of the guideline, briefing will be conducted by PSQM to all operating units regarding the updates to avoid misinterpretation and therefore, ensure protection of the water bodies.	
<b>Assessor Evaluation and Conclusion</b> (filled by auditor): Auditor Conclusions: Corrective action plan accepted. Effectiveness of implementation to verified at next audit.	
<b>Verifying on ASA-1</b> SOU10 has been implemented the corrective preventive action planned in effectively, there is no found reoccurrence of NC.	
<b>NC Minor concluded closed</b>	
<b>Verified by</b>	: Trismadi Nurbayuto

<b>NCR No.</b>	: RSPO00665	<b>Issued by</b>	: TUV Rheinland
<b>Date Issued</b>	: 14 May 2016	<b>Time Limit</b>	: Prior to certificate issuance
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 22 July 2016
<b>Standard Ref. &amp; Requirement</b>	: 4.5.1 Implementation of Integrated Pest Management (IPM) plans shall be monitored.		
<b>Non-Conformance Description &amp; Evidence observed</b> (filled by auditor) Clauses 1.2 and 1.3 of Section 15 of the Sime Darby Agricultural Reference Manual dated 1/7/2011 on Plant Protection states that Cypermethrin 5% a.i. (w/w) at 200ml per 10 litres water solution should only be introduced when there is heavy infestation of Rhinoceros beetles (Oryctes rhinoceros) in immature areas. Otherwise mass trapping of Rhinoceros Beetle should be carried out using Sime RB Pheromone. However there has been no census done for Rhinoceros beetles. Application of Cypermethrin in immature areas is done on a twice monthly basis regardless of the number of Rhinoceros beetles in the field. The amount of Cypermethrin applied from July 2015 to April 2016 is 9100 litres.			
<b>Root Cause Analysis</b> (filled by organization audited): Misinterpretation of ARM by estate management.			
<b>Corrective Action</b> (filled by organization audited): To conduct RB census and apply chemical as per the census results.			
<b>Preventive Action</b> (filled by organization audited): To include training on plant protection (by R&D) in the annual training plan.			
<b>Assessor Evaluation and Conclusion</b> (filled by auditor): <b>Verification result:</b> Mentioned in the Agriculture Reference Manual that heavy infestation above 5% requires chemical treatment. The estate			

has conducted census for each field twice a month as seen from completed *oryctes* beetle census forms and spraying is done in areas where attacks is found to be above 5 %, e.g.

- ✓ For field 13B census done on 10 June 2016, percentage attack was 8% at plot 5, 24% at plot 9 and 10% at plot 3. Spraying was done on 13 & 14 June 2016
- ✓ For field 13C census done on 3 May 2016, percentage attack was 20% at plot 11, 16% at plot 8 and 28% at plot 5. Spraying was done on 5 & 6 May 2016

**Auditor Conclusions: Closed**

**Verified by** : TUV Rheinland

<b>NCR No.</b>	: RSPO00666	<b>Issued by</b>	: TUV Rheinland
<b>Date Issued</b>	: 14 May 2016	<b>Time Limit</b>	: Prior to certificate issuance
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 22 July 2016
<b>Standard Ref. &amp; Requirement</b>	<b>4.7.2</b> <b>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.</b>		
<b>Non-Conformance Description &amp; Evidence observed</b> (filled by auditor) At Bukit Puteri Mill and Bukit Puteri Estate found OSH risks not properly reviewed as required by EHS Management System manual (EHS Risk Management) SD/SDP/SQM (EHS)/001-2-1 dated 01/07/12. Mentioned EHS Risks shall be identified and assessed on yearly basis.			
a) The assessment and control as sampled from the HIRARC records show inconsistency of the recommendation of risk control as it was found that risks that scored as medium (4-11) and high (12-16) did not have any recommendation of risk control measure and no clear planning of implementation of risk control as there was no designated person responsible to monitor implementation and no proposed dateline b) On 25/02/15, a tiger was sighted in the estate as seen from a wildlife monitoring record but was not considered in the Hirarc reviewed for FY 2015/2016 in Bukit Puteri Estate. c) Accident Warning from EHS PSQM (Ref No. EHS/12/08/2015) at Hadapan Mill involving Fireman was not considered in Hirarc review in Bukit Puteri Mill on 15/02/16.			
<b>Root Cause Analysis</b> (filled by organization audited): The HIRARC review team is responsible for reviewing the HIRARC. However, the understanding of the review process needs to be improved			
<b>Corrective Action</b> (filled by organization audited): 1. To update the HIRARC. 2. To request/conduct training on HIRARC from ESH-PSQM for all HIRARC Review Team members			
<b>Preventive Action</b> (filled by organization audited): Inclusion of training on HIRARC in the annual training plan.			
<b>Assessor Evaluation and Conclusion</b> (filled by auditor): <b>Verification result:</b> Bukit Puteri estate: a) The estate has a HIRARC updated on 25 June 2016 which includes recommended risk controls for all hazards identified to have risks ranked as medium or high, e.g.:			

- Workshop: Hazard due to spark from welding operation which may cause eye injury or blindness, risk ranked 4 (medium). Risk control stated as strictly authorized personnel to operate welding activity

- Harvesting: Hazard due to risk of falling FFB and debris, risk ranked 4 (medium): Existing controls include PPE, while risk control stated is training on distance between the cutter and the palm, and eye test. For the mill, the HIRARC dated February 2016 was updated by hand to include recommended risk control for all hazards identified to have risks considered medium to high level. However, the nature of risk control recommended for most hazards was listed mostly as 'supervision', 'training' or 'goggles' and should be more specific to the identified hazard. As the existing control including PPE to be used, ongoing administrative controls, this was noted as observation. The company is also in progress is preparing a new SOP for HIRARC preparation which will be reviewed next audit.

b) The estate updated HIRARC now includes risk of allergy/injuries from insects and animal attacks in the updated HIRARC, which is identified as risk level 3 (low) and existing control is to install safety awareness and destroy/remove the nest.

Bukit Puteri Palm Oil Mill:

c) The Accident Warning from EHS PSQM (Ref No. EHS/12/08/2015) at Hadapan Mill involving a Fireman has been considered in revised HIRARC for Bukit Puteri mill. The accident was regarding a case which occurred on 16 July 2015 where a mill worker was tasked to clean out the dust collector chute and found the chute was stuck. The worker tried to unclog the chute by using a long pipe to dig into the chute, which resulted in a large amount of hot dust (300° C) falling on top of victim. The victim suffered third degree burns and passed away. Bukit Puteri Mill considered this case in their HIRARC, with risk level of 4 (medium). The existing controls listed included training, LOTO, baricape tape, signage and PPE, while the recommended risk control listed included further training. The additional risk control should be different from the existing risk controls and be more detailed (i.e. what kind of training to be provided), hence this was noted as an observation.

**Auditor Conclusions: Closed with observations**

**Verified by** : TUV Rheinland

<b>NCR No.</b>	: RSPO00667	<b>Issued by</b>	: TUV Rheinland
<b>Date Issued</b>	: 14 May 2016	<b>Time Limit</b>	: Prior to certificate issuance
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 22 July 2016
<b>Standard Ref. &amp; Requirement</b>	<b>5.2.2</b> <b>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan.</b>		
<b>Non-Conformance Description &amp; Evidence observed</b> (filled by auditor) The mill water catchment is identified as a HCV area and also is being used for mill housing water consumption. However, there is was found there was no demarcation of surrounding palms to indicate the areas where chemical application was restricted and evidence was observed that circle spraying was carried out at planted palms on sloped areas near the mill pond, which creates risk of chemical run-off into the mill pond			
<b>Root Cause Analysis</b> (filled by organization audited): There is no awareness for sprayer to apply agrochemicals at HCV area			
<b>Corrective Action</b> (filled by organization audited): <ol style="list-style-type: none"> <li>1. Training conduct to the sprayer team.</li> <li>2. Demarcate the palm with white paint.</li> </ol>			
<b>Preventive Action</b> (filled by organization audited): <ol style="list-style-type: none"> <li>1. Regular maintenance at the area with manual weeding. The Herbicide usage is prohibited.</li> <li>2. Basic maintenance of existing oil palm are confine to the palm circle or planting row through manual weeding to</li> </ol>			

facilitate harvesting operation.	
<b>Assessor Evaluation and Conclusion (filled by auditor):</b>	
<b>Verification result:</b>	
During on-site verification, it was confirmed that the estate has taken action to demarcate the palms surrounding the mill water catchment as indication that these areas would no longer be sprayed.	
<b>Auditor Conclusions: Closed</b>	
<b>Verified by</b>	: TUV Rheinland

<b>NCR No.</b>	: RSPO00668	<b>Issued by</b>	: TUV Rheinland
<b>Date Issued</b>	: 14 May 2016	<b>Time Limit</b>	: Prior to certificate issuance
<b>NC Grade</b>	: Major	<b>Date of Closing</b>	: 22 July 2016
<b>Standard Ref. &amp; Requirement</b>	6.1.3 Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.		

**Non-Conformance Description & Evidence observed (filled by auditor)**

**1. SIA Management Action plan.**

1a. Mill: Does not contain any finite timelines for scheduled completion. There is supposed to be a meeting between the mill management, estate management, bus operator and parents but the management plan did not state when the meeting would be conducted. The status is ongoing even though the SIA was conducted 7 months ago.

1b. Estate: Does not contain any status update (completion and evidence) on the issues captured in the SIA report.

1c. No evidence of implementation of the management plan.

**2. Mill and estate:** There is no evidence that the management captures ongoing SIA issues and incorporates them into the management action plan.

**Root Cause Analysis (filled by organization audited):**

Although a PIC for social issues have been appointed, further training on identification and monitoring of issues is required.

**Corrective Action (filled by organization audited):**

1. PIC to request training from SEPU-PSQM regarding identification and monitoring of social issues.
2. To conduct stakeholder meeting & update the Social Action Plan based on the outcome of the meeting.

**Preventive Action (filled by organization audited):**

To include Identification of new issues & updates of Social Action Plan as part of the agenda of the OU monthly meeting.

**Assessor Evaluation and Conclusion (filled by auditor):**

**Verification result:**

1a) The company has updated their SIA management plan to indicate the status of all planned actions as done. This includes the planned discussion with estate management and the school bus driver to provide better school transportation for children. Meeting minutes for this meeting done on 25 May 2016 with evidence sighted including attendance lists with 13 participants, photos and meeting minutes. However from the meeting minutes, there did not seem to be any proper resolution on how to resolve the issue of improving transportation, as only complaints and issues faced by the bus driver was discussed, and the conclusion was that children would be trained about safety on the school bus. This does not seem to be an adequate resolution to one of the issues raised during the discussion which was overcrowding of the school buses. This was noted as an observation.

1b) The company has updated their SIA management plan to indicate the status of all planned actions as done.
1c) The company provided evidence of implementation of the SIA management plan, e.g. PPE provision records as evidence of action plan to provide good quality PPE to workers, and meeting regarding transport for school children as explained above.
2. The mill provided a new action plan for year 2016/2017 which plans to have two new houses for workers (observed to be in progress on-site as the houses are already constructed and pending the certificate of fitness), parking bay for vehicles, and to provide 17 units of roofing turbine and ventilators for executives and staff.
<b>Auditor Conclusions: Closed with observations</b>
<b>Verified by</b> : TUV Rheinland

<b>NCR No.</b> :	<b>RSPO00669</b>	<b>Issued by</b> :	<b>TUV Rheinland</b>
<b>Date Issued</b> :	<b>14 May 2016</b>	<b>Time Limit</b> :	<b>ASA-1</b>
<b>NC Grade</b> :	<b>Minor</b>	<b>Date of Closing</b> :	<b>22 July 2016</b>
<b>Standard Ref. &amp; Requirement</b> :	<b>6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.</b>		
<b>Non-Conformance Description &amp; Evidence observed (filled by auditor)</b> The Stakeholder List for Bukit Puteri Estate for FY2015/16 was not updated to include government Bodies			
<b>Root Cause Analysis (filled by organization audited):</b> Estate not aware to update stakeholder list.			
<b>Corrective Action (filled by organization audited):</b> Immediate update the stakeholder list.			
<b>Preventive Action (filled by organization audited):</b> Management will review on the annual basis the list of stakeholder.			
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> During the ASA-1, auditor has been verify the effectiveness of the corrective and preventive action planned and taken. There is no re-occurrence of the non-conformity. <b>The NC Minor stated Closed</b>			
<b>Verified by</b> :	<b>Mohd Nizam Bin Abu Bakar</b>		

<b>NCR No.</b> :	<b>RSPO00670</b>	<b>Issued by</b> :	<b>TUV Rheinland</b>
<b>Date Issued</b> :	<b>14 May 2016</b>	<b>Time Limit</b> :	<b>Prior to certificate issuance</b>
<b>NC Grade</b> :	<b>Major</b>	<b>Date of Closing</b> :	<b>22 July 2016</b>
<b>Standard Ref. &amp; Requirement</b> :	<b>6.5.2 Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a</b>		



	management official.
<p><b>Non-Conformance Description &amp; Evidence observed (filled by auditor)</b>  Contracts for local and foreign workers were sighted at the Bukit Puteri mill and estate. The following are some gaps in the contractual agreements:</p> <p><b>1. Availability of Employment Contracts/Extensions</b></p> <ul style="list-style-type: none"> <li>▪ 1a. Bukit Puteri Estate: There is no evidence of employment contracts for Bangladeshi and Sri Lankan workers and older workers (more than 3 years) for Indonesian, Indian and Nepali workers.</li> <li>▪ Bukit Puteri Estate: There is no evidence of extension of employment contracts for foreign workers who have worked for more than 3 years.</li> </ul> <p><b>2. Contradiction between contract and practice:</b>  2a. Clause 12: (Elaun Transportasi) of the employment contract for foreign workers states that airfare workers from Indonesia, India, Nepal and Sri Lanka at the Bukit Puteri Estate reveal that the workers paid their agents for their airfare.  2b. There is no evidence of payment of RM 200 to foreign workers' families (Saguhati Wang Keberangkatan Masuk Kerja) (Clause 15 of the employment contract in Malay, April 2013 version).</p> <p><b>3. Third Party Contract Workers</b>  There is no mechanism on the part of the estate management to monitor compliance of contractors pertaining to the Labour Laws and other relevant legislation related to labour.</p> <p><b>4. Passport/OT Consent Forms:</b></p> <ul style="list-style-type: none"> <li>▪ Bukit Puteri Estate: There is no passport consent form for Nepali worker: Dipendra Kumar Danuwar (Passport: 07278845).</li> <li>▪ Mill: Consent form sighted only for overtime of more than 130 hours. Najmuddin bin Jumawal (Januari 2015) who did 146 hours of overtime. But his punch card and pay slip does not reflect his hours of overtime. Note that consent should be before the OT and not after the OT.</li> </ul> <p><b>5. Validity of the contracts/ consent letters/other documents):</b></p> <ul style="list-style-type: none"> <li>▪ Bukit Puteri estate: The employment contract for Chhotae Nishad (Passport No: 9895877), Nepali worker (Dipendra Kumar Danuwar (Passport No: 07278845) is not signed by the management.</li> <li>▪ Bukit Puteri Estate: Electricity and water deduction consent form not signed by management, E.g. for Nepali worker: Dipendra Kumar Danuwar (Passport: 07278845).</li> </ul> <p><b>6. Language:</b></p> <ul style="list-style-type: none"> <li>▪ Estate: Contracts of some foreign Indian workers are in English while other are in Malay, ie. Not standardised, e.g. Clause no. 6 (working hours) are not specified in the Malay version although it is in English version; Clause 7 and Clause 23.1 have variations in both versions.</li> <li>▪ Workers interviewed at Bukit Puteri Estate from India, Nepal and Bangladesh have a poor understanding of their employment contracts. Indonesian workers complained that they cannot understand their pay slips which are in English.</li> </ul>	
<p><b>Root Cause Analysis (filled by organization audited):</b></p> <ol style="list-style-type: none"> <li>1. Unable to retrieve the file during the audit as it has been relocated to archive store.</li> <li>2. Estate management not realize the implementation extension of employment contract for foreign workers who have worked more than 3 year.</li> </ol>	
<p><b>Corrective Action (filled by organization audited):</b></p> <ol style="list-style-type: none"> <li>1. To ensure all auditable files and record being properly kept and maintained</li> <li>2. Estate management to reissue the extension contract agreement to the respective workers.</li> </ol>	
<p><b>Preventive Action (filled by organization audited):</b></p> <ol style="list-style-type: none"> <li>1. Chief clerk as a person in-charge and ensure the contracts are retrievable</li> <li>2. Foreign workers employment contract will be updated regularly on yearly basis</li> </ol>	
<p><b>Assessor Evaluation and Conclusion (filled by auditor):</b>  <b>Verification result:</b>  <b>1. Availability of Employment Contracts/Extensions</b></p>	

During onsite verification on 22 July 2016, it was confirmed that employment contracts for workers who Bangladesh and Sri Lankan workers at Bukit Puteri estate and extension of employment contracts for workers who have worked more than 3 years for the estate have been made available.

**2. Contradiction between contract and practice:**

2a. During on-site verification on 22 July, the following foreign workers who were interviewed informed that they had paid a lump sum to their agents including airfare, however as there was no record of the payment, it could not be ascertained if the lump sum payment actually included airfare, and whether payment was made to SDP's own agents or other agents. In addition, there is possibility that said workers had paid to other agents within the worker's country which are not engaged directly by SDP and hence not within the control of the company. There was evidence provided from SDP's Human Resources Department for charges made out to the respective estates for new incoming workers, including the list of workers names and various charges deducted including for airfare subsidy of each workers.

Sampled interviewed workers were crossed checked against the list of charges and it was confirmed that airfare subsidy was paid by the estates for the workers to the company's HQ, e.g. as follows:

- Nepalese workers named Lil Kumar Bhujel, Dipendra Kumar Danuwar and
- Indonesian workers named Jumadil,
- Indian workers named Chhotae Nishad
- Sri Lankan Workers named Karunathilaka Galkadune Ralalage

The price of the airfare subsidy paid by the estate for foreign workers airfare was cross checked against typical prices of airfare from travel from their home countries and confirmed to exceed the normal airfare price.

2b. Clarification received from the company is that payment of RM200 (Monetary Gift for Departure to Location of Work) is provided only to the families of Indonesian workers and not to other foreign workers due to agreement with the Indonesian immigration department. The error is therefore in the employment contracts of other foreign workers which includes the generic statement that the monetary gift will be provided to their families. This was confirmed through interviews with Indonesian workers who confirmed that their families received the monetary gift, whereas other foreign workers confirmed their families did not received such a gift. The company has been made aware of this discrepancy in their worker's contracts as well as several other issues pertaining to contract as raised during this and several other audits done at other SDP CHs, and the company provided evidence that the worker's contract template is currently under review and will be revised to remove the discrepancies. This will be followed up further during the next surveillance audit.

**3. Third Party Contract Workers**

The company has developed a checklist to be used by the estate or mill to assess contractors for availability of labour related documents, and a power point presentation entitled 'Contractors Training RSPO' to brief contractors on workers contracts, monthly payslips and documentation required. Briefing for SOU10: Bukit Puteri contractors was sighted and the checklist completed for each contractor was also sighted as evidence of evaluation of compliance of third party contractors.

**4. Passport/OT Consent Forms:**

Bukit Puteri Estate: Passport consent form for Nepali worker named Dipendra Kumar Danuwar (Passport: 07278845) was sighted and signed by the worker and the management on 01/10/2014. Mill: During on-site verification 22 July 2015, it was found that the punch card and pay slip of Najmuddin bin Jumawal for January 2015 showed 90 hours of overtime, not 146 hours,

**5. Validity of the contracts/ consent letters/other documents):**

- Bukit Puteri estate: The employment contract for Chhotae Nishad (Passport No: 9895877), Nepali worker (Dipendra Kumar Danuwar (Passport No: 07278845) has been signed by management both on 2nd October 2014. Other employment contracts of workers were sampled during on-site verification and confirmed to have been signed by management.
- Bukit Puteri Estate: Electricity and water deduction consent form for Nepali worker: Dipendra Kumar Danuwar (Passport: 07278845) has been signed by management.

**6. Language:**

- It was clarified by the company that the variations in the English and Malay version of the contract is due to the

estate using the old version of the Malay contract which was superseded by the newer English version of the contract (January 2015 version) and hence the English version is applicable and not the Malay version. This was accepted as explanation to close this issue.

The audit team had noted a number of inconsistencies with contract terms which have been raised as non-compliances in this audit as well as audits for other SDP CHs around the same time, and the HR management team of Sime Darby Plantations is in progress of reviewing the contract template to remove all such inconsistencies and ensure terms stated are in accordance with actual implementation. A draft of the contract template for foreign workers (Indonesian and non-Indonesian) is being revised by SDP's HR team was sighted. As the contract template will be a standard document used for all SDP's CHs, the company requires additional time to review and revise the template before approval and use throughout the company.

- During on-site verification at Bukit Puteri estate on 22 July, foreign workers from Nepal, India and Bangladesh were interviewed and were able to explain quite well the terms of their contracts

**Auditor Conclusions: Closed with observations**

**Date of closure: 22 July 2016**

**Verified by : TUV Rheinland**

<b>NCR No.</b>	<b>: RSP000671</b>	<b>Issued by</b>	<b>: TUV Rheinland</b>
<b>Date Issued</b>	<b>: 14 May 2016</b>	<b>Time Limit</b>	<b>: Prior to certificate issuance</b>
<b>NC Grade</b>	<b>: Major</b>	<b>Date of Closing</b>	<b>: 25 May 2016</b>
<b>Standard Ref. &amp; Requirement</b>	<b>: 6.9.1 A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce.</b>		
<b>Non-Conformance Description &amp; Evidence observed (filled by auditor)</b>			
<ul style="list-style-type: none"> <li>▪ Poor knowledge/Lack of exposure of sexual harassment policy and grievance mechanism amongst male workers at the mill. There is evidence of training done in December 2015 but it does not encompass the entire workforce.</li> <li>▪ There was a sexual harassment case at the estate in April 2014. However, there is no evidence of any awareness raising/mitigation measures to prevent a recurrence of any such incidences.</li> </ul>			
<b>Root Cause Analysis (filled by organization audited):</b>			
Improvement on training materials and audience is required as the earlier focus was on female employees.			
<b>Corrective Action (filled by organization audited):</b>			
<ol style="list-style-type: none"> <li>1. To establish training program that ensures coverage for all workers.</li> <li>2. Conduct training.</li> </ol>			
<b>Preventive Action (filled by organization audited):</b>			
The sexual harassment awareness training will be conducted on annually basis. The procedure and mechanism for reporting will displayed at the muster ground.			
<b>Assessor Evaluation and Conclusion (filled by auditor):</b>			
<b>Verification result:</b>			
The company provided records of a talk on sexual harassment and grievance mechanism done on 25 May 2016 at the divisional office with 53 participants from the mill and estate, including male and female staff. The training materials were sighted including presentation on types of sexual harassment, management responsibility and the grievance mechanism, as well as a training on the objectives of the gender committee. Mill and estate personnel interviewed during on-site verification were able to explain the training content and grievance mechanism.			
<b>Auditor Conclusions: Closed</b>			
<b>Verified by</b>	<b>: TUV Rheinland</b>		

<b>NCR No.</b>	<b>: RSP000672</b>	<b>Issued by</b>	<b>: TUV Rheinland</b>
<b>Date Issued</b>	<b>: 14 May 2016</b>	<b>Time Limit</b>	<b>: Prior to certificate issuance</b>
<b>NC Grade</b>	<b>: Major</b>	<b>Date of Closing</b>	<b>: 20 July 2016</b>
<b>Standard Ref. &amp; Requirement</b>	<b>: 6.9.2</b> <b>A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce</b>		
<b>Non-Conformance Description &amp; Evidence observed (filled by auditor)</b> There is no clear policy to protect the reproductive rights of women. There is a phrase in the Social Policy which states that “the company is committed to ‘develop and apply a policy to ..... and to protect their reproductive rights.” In addition, there is no documented evidence of communication of the policy to all levels of the work force. E.g. interviews with workers and staff at the mill and Bukit Puteri estate reveal that the workers and staff do not understand what reproductive rights constitute.			
<b>Root Cause Analysis (filled by organization audited):</b> SDP’s understanding is that the reproductive right policy is already embedded in the Social and Humanity Policy. Therefore, no specific Reproductive Rights Policy established.			
<b>Corrective Action (filled by organization audited):</b> PSQM to establish a training plan to train the gender committee as well as the workers on the Reproductive Rights Policy as stated in the Social and Humanity Policy. PIC: PSQM RSP0 Unit & SEPU Unit			
<b>Preventive Action (filled by organization audited):</b> PSQM to conduct refresher training on regular basis. PIC: PSQM RSP0 Unit & SEPU Unit			
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> <b>Verification result:</b> It was confirmed that the company’s Social and Humanities Policy dated January 2015 includes a statement of protection of reproductive rights of women and hence not required to develop a separate policy for protection of reproductive rights. It is noted that the policy does not specify any commitment to ongoing activities such as education and awareness programmes for the purpose of implementation of this policy. This is noted as an opportunity for improvement. The company has developed training materials entitled ‘Introduction to Reproductive Rights’ Policy in our Plantation’. The training material includes discussion on issues pertaining to gender discrimination, sexual health, and family planning, and includes the definition of reproductive rights, global statistics on reproductive issues, SDP’s policy on protection of reproductive rights, as well as the efforts taken by SDP to protect the reproductive rights of their workforce and a reminder to go through the Gender Committee to report any issue pertaining to this. The material ends with a quiz to check the understanding of training participants. The company has conducted a training using these training materials at SOU 10: Bukit Puteri for all female employees of the mill and estate on 20 July, with evidence of signed attendance lists by 25 participants at Bukit Puteri estate and photos. Female staff interviewed at the estate and mill confirmed that they had attended the meetings and were explained about the reproductive rights policy of the company. <b>Auditor Conclusions: Closed</b>			
<b>Verified by</b>	<b>: TUV Rheinland</b>		

<b>NCR No.</b>	<b>: RSP000673</b>	<b>Issued by</b>	<b>: TUV Rheinland</b>
<b>Date Issued</b>	<b>: 14 May 2016</b>	<b>Time Limit</b>	<b>: Prior to certificate issuance</b>

<b>NC Grade</b> :	<b>Major</b>	<b>Date of Closing</b> :	<b>22 July 2016</b>
<b>Standard Ref. &amp; Requirement</b> :	<b>8.1.1</b> <b>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</b>		
<b>Non-Conformance Description &amp; Evidence observed (filled by auditor)</b> There is no evidence of a continuous improvement plan for social aspects for both the mill and estate.			
<b>Root Cause Analysis (filled by organization audited):</b> The continuous include plan un-retrievable during the audit. The person in-charge has overlook to establish the continuous improvement plan for the both estate and mill.			
<b>Corrective Action (filled by organization audited):</b> Establish the plan and monitor by the management. Establish the new continuous improvement plan for social aspects and monitor by the management.			
<b>Preventive Action (filled by organization audited):</b> The management will review the plan on the annual basis.			
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> <b>Verification result:</b> The mill actually had an SIA management plan found during the audit but it was not updated to indicate the status of all planned actions as done. During on-site verification, it was confirmed that the SIA Management plan was updated on the status of implementation, including a planned discussion with estate management and the school bus driver to provide better school transportation for children. The company provided evidence of implementation of the SIA management plan, e.g. PPE provision records as evidence of action plan to provide good quality PPE to workers, and meeting regarding transport for school children. The company also provided a new SIA action plan for year 2016/2017 which plans to have two new houses for workers (observed to be in progress on-site as the houses are already constructed and pending the certificate of fitness), parking bay for vehicles, and to provide 17 units of roofing turbine and ventilators for executives and staff. However, the SIA action plan seems only focused on provision of infrastructure to workers but did not consider social aspects pertaining to other stakeholders and a management plan for these aspects. This is noted as an observation. <b>Auditor Conclusions: Closed with observations</b>			
<b>Verified by</b> :	<b>TUV Rheinland</b>		

<b>NCR No.</b> :	<b>RSPO00674</b>	<b>Issued by</b> :	<b>TUV Rheinland</b>
<b>Date Issued</b> :	<b>14 May 2016</b>	<b>Time Limit</b> :	<b>Prior to certificate issuance</b>
<b>NC Grade</b> :	<b>Major</b>	<b>Date of Closing</b> :	<b>14 June 2016</b>
<b>Standard Ref. &amp; Requirement</b> :	<b>E.3.1</b> <b>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</b> <b>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</b> <b>b) The name of the person having overall responsibility for and authority over the</b>		



	<p><b>implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</b></p>
<p><b>Non-Conformance Description &amp; Evidence observed</b> (filled by auditor)</p> <p>1) Mass Balance record for Bukit Puteri Palm Oil Mill was not consistently updated and balanced on a 3 monthly basis, as it was found that the latest Mass Balance record was not updated for all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK since January 2016. This is not in accordance with the mill SCCS SOP Clause 9.3 as well as RSPO SCC standard Clause E.5.1.</p> <p>2) Sampled FFB consignment notes as well as FFB tickets issued from the mill to Bukit Puteri estate does not state the RSPO certificate number, e.g.</p> <ul style="list-style-type: none"> <li>- Consignment note dated 12/05/2016 with C/N no. 95068 from Bukit Puteri estate with FFB ticket no. 74650</li> <li>- Consignment note dated 12/5/2016 with C/N no. 95193 from Bukit Puteri estate with FFB ticket no. 7464.</li> </ul> <p>This is not in accordance with Clause 6.3 of the mill's SCCS SOP which specifies that the RSPO certificate number must be stated on delivery notes of all FFB received.</p> <p>3) There is no evidence of latest training done since the implementation of the new mill SCC SOP dated March 2016. Training is also lacking for relevant personnel responsible for maintenance of the Mass Balance records due to a number of errors in the Mass Balance sheet identified. This is not in accordance with Clause 13.1 of the mill's SCC SOP.</p>	
<p><b>Root Cause Analysis</b> (filled by organization audited):</p> <ol style="list-style-type: none"> <li>1. No understanding to update the mass balance sheet as per SCCS SOP clause 9.3.</li> <li>2. Estate or division which does not have own weighbridge will using incoming weighbridge at mill, therefore the outgoing ticket was not printed with RSPO certificate number.</li> </ol>	
<p><b>Corrective Action</b> (filled by organization audited):</p> <ol style="list-style-type: none"> <li>1. Immediate training conducted to the person in-charge.</li> <li>2. To manually stamp for home estates that have no weighbridge.</li> </ol>	
<p><b>Preventive Action</b> (filled by organization audited):</p> <ol style="list-style-type: none"> <li>1. The mass balance sheet will be reviewed by the PIC on a quarterly basis.</li> <li>2. PSQM to update the SCCS SOP to include disclaimer for the estate or division which does not have weighbridge.</li> </ol>	
<p><b>Assessor Evaluation and Conclusion</b> (filled by auditor):</p> <p><b>Verification results:</b></p> <ol style="list-style-type: none"> <li>1) The Mass Balance record for Bukit Puteri Mill has been updated for all data up until May 2016 including all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK.</li> <li>2) Prior to on-site verification, the company had provided evidence of sample FFB consignment notes as well as FFB ticket which had been stamped with the RSPO certificate number. This practice was confirmed further during on-site verification.</li> <li>3) The mill provided evidence of SCCS training done on 25 May 2016 for 10 participants including the mill manager, assistants, office clerks, weighbridge operators, AAO, auxiliary police head, and lab supervisor. During on-site verification the staff were interviewed and confirmed they had attended the training and were able to explain their expected responsibilities in the implementation of the SCCS.</li> </ol> <p><b>Auditor Conclusions: Closed</b></p>	
<b>Verified by</b>	<b>: TUV Rheinland</b>



<b>NCR No.</b>	<b>: RSP000675</b>	<b>Issued by</b>	<b>: TUV Rheinland</b>
<b>Date Issued</b>	<b>: 14 May 2016</b>	<b>Time Limit</b>	<b>: Prior to certificate issuance</b>
<b>NC Grade</b>	<b>: Major</b>	<b>Date of Closing</b>	<b>: 14 June 2016</b>
<b>Standard Ref. &amp; Requirement</b>	<b>E.5.1</b> <b>a) The site shall record and balance all receipts of RSP0 certified FFB and deliveries of RSP0 certified CPO and PK on a three-monthly basis.</b> <b>b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSP0.</b> <b>c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short (i.e. product can be sold before it is in stock.)</b>		
<b>Non-Conformance Description &amp; Evidence observed (filled by auditor)</b> Bukit Puteri mill has a Mass Balancing records for the mill for FY 2014/15 and FY 2015/16. However, there were a number of inconsistencies some figures stated in the mass balancing sheet when compared with actual records, i.e.: <ol style="list-style-type: none"> <li>i. Percentage of certified and non-certified CPO was produced wrongly calculated as percentage of certified amount produced from total of certified CPO produced in 3 months and percentage of noncertified amount produced from total of non-certified CPO produced in 3 months. The calculation should be percentage of certified &amp; non-certified from total of CPO produced from each respective month</li> <li>ii. Figures for total CPO produced were not stated or not consistent with mill's SAP records.            Example: 1: There was CPO production in all months among July 2015 to March 2016, but Mass Balance sheet stated zero CPO production for these months.            Example 2: Total CPO stated for March 2015 was 14.47 tonnes but actual was 682.989 tonnes, and total for July 2014 was stated as 45.63 tonnes but actual was 766.29 tonnes. Similar issue for all other months among July 2014 to March 2015.</li> <li>iii. It is unclear how figures of total CSPO produced is calculated as it is not stated in SAP records and could not be demonstrated by the mill how these figures were derived. In addition, CSPO figures stated were much higher than CPO production figures, which is not logical</li> <li>iv. Some CPO despatched figures were found to inconsistent with SAP records, e.g. total CPO despatched stated for March 2015 was 772.39 tonnes while actual was 849.45 tonnes, and total CPO despatched stated for July 2014 was 719.62 tonnes while actual was 615.04 tonnes.</li> <li>v. Some PK despatched figures were found to be inconsistent with SAP records, e.g. total PK despatched stated for March 2015 was 144.61 tonnes while actual was 233.03 tonnes, and total CPO despatched stated for July 2014 was 142.02 tonnes while actual was 85.22 tonnes (figures stated in the MB sheet was PK produced, not PK despatched)</li> <li>vi. There is no column for total CSPO despatched which is required to determine whether or not total CSPO despatched does not exceed the CSPO produced Due to these issues with the mass balance calculation, it could not be confirmed if total CSPO produced has exceeded the total certified CPO or whether the mill had consistently delivered CSPO from a positive stock.</li> </ol>			
<b>Root Cause Analysis (filled by organization audited):</b> Personnel responsible for update of the Mass Balance records do not understand maintenance of the records.			
<b>Corrective Action (filled by organization audited):</b> Re-do the input mass balance sheet on the quarterly basis.			
<b>Preventive Action (filled by organization audited):</b> The mass balance sheet will be reviewed by the PIC on a quarterly basis.			
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> <b>Verification results:</b> The mill provided an updated Mass Balance sheet for FY 2014/15 and FY 2015/16, where inconsistencies			

have been rectified, i.e.:

- i) Percentage of certified & non-certified from total of CPO produced from each respective month is now calculated correctly
- ii) Figures for total CPO produced stated are now consistent with mill's SAP records, as sampled from FY 2014/15 and FY2015/16 records and compared against the Mass Balance sheet
- iii) Calculation of total CSPO produced was now clearly shown in the Mass Balance sheet formula, showing that it was derived from total CPO produced multiplied with percentage total certified FFB received
- iv) Figures for CPO despatched stated are now consistent with mill's SAP records, as sampled from FY 2014/15 and FY2015/16 records and compared against the Mass Balance sheet
- v) Figures for PK despatched stated are now consistent with mill's SAP records, as sampled from FY 2014/15 and FY2015/16 records and compared against the Mass Balance sheet
- vi) Column for total CSPO despatched has now been added for easy comparison to CSPO despatched

**Auditor Conclusions: Closed**

**Verified by** : TUV Rheinland

**3.5.2.1 Identification of Findings, Corrective Actions and Observations at ASA-1 Assessment**

<b>NCR No.</b>	: 2017.1	<b>Issued by</b>	: Sandra Purba
<b>Date Issued</b>	: 28 April 2017	<b>Time Limit</b>	: ASA-2
<b>NC Grade</b>	: Minor	<b>Date of Closing</b>	:
<b>Standard Ref. &amp; Requirement</b>	: 4.7.6 All workers shall be provided with medical care, and covered by accident insurance.		
<b>Non-Conformance Description &amp; Evidence observed</b> <i>(filled by auditor)</i>			
<p>All local employees have been covered in the workers compensation scheme and social security (SOCISO), and payments are made monthly. Based on interviews with management representatives known that the foreign worker is covered in RHB Insurance Berhad, valid for one year period.</p> <p>However, the company has not been able to show the employee's insurance certificate or payment on behalf of Prem Kumar (Nepali), Suyanto (Indonesia) and Mohan Singh (India), it's based on sampling.</p>			
<b>Root Cause Analysis</b> <i>(filled by organization audited)</i> :			
<p>The policy insurance is not retrievable and provided during the audit. As per current arrangement, OU's request the policy from Workers Management Unit (WMU) then, WMU will communicate with Myeg to provide the policy accordingly. The process take a few time and details because the ou's need to select the name of the workers by their own.</p>			
<b>Corrective Action</b> <i>(filled by organization audited)</i> :			
<p>The WMU has request the insurance policy from Myeg and distributed to the respective OU's.</p>			
<b>Preventive Action</b> <i>(filled by organization audited)</i> :			
<p>Moving forward, the Myeg provided the access link to the Sime Darby Plantation, and the WMU has authorize to access data base once the payment has completed. The WMU will email the policy to the OU's upon receipt from the data base.</p>			
<b>Assessor Evaluation and Conclusion</b> <i>(filled by auditor)</i> :			
<p>The root cause analysis and preventive action accepted, the evidence of the corrective action and the effectiveness of the preventive action will be verified on the next ASA.</p>			

The NC still OPEN	
<b>Verified by</b>	:

**3.5.2.2 Opportunity for Improvement**

No	Description
4.4.4	Mill consider to adjust the use water for processing in accordance with the budget
4.7.5	Ensure the preparedness of emergency response equipment
5.3.3	SOU10 management team to consider initiating waste segregation for domestic waste







**3.5.2.3 Noteworthy Positive Components**

No	Description
1	Company has commitment to implement the principle of sustainable palm oil management.
2	Good filing system maintained at mill and estates.
3	Good housekeeping observed in Mill and as evidence of 5'S implementation.

**3.6 Summary of Arising Issues from Public, Management and Auditor Response**

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p><b>Engineering Contractor of Bukit Puteri Mill - Lock Wei Kok</b></p> <ul style="list-style-type: none"> <li>- Generally he is satisfied with Bukit Puteri Mill treatment against him in term of contract issuance.</li> <li>- Payment is done after the invoice submitted to the company, an it has been paid in timely</li> <li>- The agreement has been drawn and its copy has been delivered to the contractor.</li> </ul>	<p>The auditor has verify related to contractor payment and it has been in accordance with C6.10</p>
<p><b>NUPW Representative - Midah bt Talib</b></p> <ul style="list-style-type: none"> <li>- There is no on-going issue related to employment, and has satisfied with the present working condition, accommodation and relation between Estate Management and NUPW.</li> <li>- Meeting with the SOU10 Management performed in accidentally (if there were an employment case)</li> <li>- The appointment of NUPW's board in the unit is the authority of NUPW and without any involvement from the company</li> </ul>	<p>The auditor has verify related to implementation of union labor and it has been in accordance with C6.6</p>
<p><b>Gender Committee - Norazmira Abdul Manaf</b></p> <p>Gender Committee was implemented 5 years ago. So far there is no sexual harassment case occurred. One case involving love affair between local women and foreign worker (man). Issue was settle by discussion.</p>	<p>Has been verified and explained in C6.9</p>
<p><b>EFB Transporte - Khiruddin Abdullah</b></p> <p>Has been a contractor for Bukit Puteri for past 4 years. Very satisfied with the working environment and payment method. Creating job for local people.</p>	<p>The auditor has verify related to contractor payment and it has been in accordance with C6.10</p>
<p><b>Questionnaire sent to NGO's :</b></p> <ul style="list-style-type: none"> <li>- Sustainable Development Network Malaysia (SUSDEN) à <a href="mailto:bisans@pc.jaring.my">bisans@pc.jaring.my</a></li> <li>- Malaysian Environmental NGOs – MENGO à <a href="mailto:admin@mengo.org">admin@mengo.org</a></li> <li>- United Nations Development Programme - UNDP Malaysia à <a href="mailto:registry.my@undp.org">registry.my@undp.org</a></li> <li>- Malaysian National Animal Welfare Foundation – MNAWF à <a href="mailto:secretary@mnawf.org.my">secretary@mnawf.org.my</a></li> </ul> <p>In regard to any issues of environment, OSH, land dispute, worker welfare, transparency, land title, social, EIA, SIA,</p>	<p>Auditor has been verified the entire RSPO P&amp;C - MY Interpretation.</p>

<b>Public Issues (Institution/ NGO/Community)</b>	<b>Auditor Responses</b>
HCV, ect. However, until closing meeting there were no response addressed to PT MAL from these NGOs	

<b>4.0</b>	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>						
<b>4.1</b>	<b>Formal Sign-off of Assessment Findings</b>						
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <table data-bbox="379 817 1343 1108"><tr><td data-bbox="379 817 746 884"><b>Sime Darby Plantation Sdn Bhd</b> <b>SOU10 Chairman</b></td><td data-bbox="1086 817 1343 884"><b>PT Mutuagung Lestari</b> <b>Lead Auditor</b></td></tr><tr><td data-bbox="486 907 646 996"></td><td data-bbox="1109 907 1316 996"></td></tr><tr><td data-bbox="451 1037 675 1108"><b><u>Mohd. Esa Mohidin</u></b> Friday, 26 May 2017</td><td data-bbox="1099 1037 1324 1108"><b><u>Sandra Purba</u></b> Friday, 26 May 2017</td></tr></table>	<b>Sime Darby Plantation Sdn Bhd</b> <b>SOU10 Chairman</b>	<b>PT Mutuagung Lestari</b> <b>Lead Auditor</b>			<b><u>Mohd. Esa Mohidin</u></b> Friday, 26 May 2017	<b><u>Sandra Purba</u></b> Friday, 26 May 2017
<b>Sime Darby Plantation Sdn Bhd</b> <b>SOU10 Chairman</b>	<b>PT Mutuagung Lestari</b> <b>Lead Auditor</b>						
							
<b><u>Mohd. Esa Mohidin</u></b> Friday, 26 May 2017	<b><u>Sandra Purba</u></b> Friday, 26 May 2017						



**Appendix 1. List of Stakeholder Contacted in the RSPO Certification Process**

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Engineering Contractor of Bukit Puteri Mill - Lock Wei Kok	Raub, Pahang, Malaysia	-	Interview	26 April 2017	√	
2	NUPW Representative - Midah bt Talib	Raub, Pahang, Malaysia	-	Interview	27 april 2017	√	
3	Gender Committee - Norazmira Abdul Manaf	Raub, Pahang, Malaysia	-	Interview	27 april 2017	√	
4	EFB Transporter - Khiruddin Abdullah	Raub, Pahang, Malaysia	-	Interview	26 April 2017	√	
5	Sustainable Development Network Malaysia (SUSDEN)	B-2114 Tingkat Satu, Jalan Merpati 25300 Kuantan, Pahang	<a href="mailto:bisans@pc.jari.ng.my">bisans@pc.jari.ng.my</a>	Email	12 April 2017		√
6	Malaysian Environmental NGOs – MENGO	No. 41, Lorong Burhanuddin Helmi 11, Taman Tun Dr. Ismail, 60000 Kuala Lumpur, Malaysia.	<a href="mailto:admin@mengo.org">admin@mengo.org</a>	Email	12 April 2017		√
7	United Nations Development Programme - UNDP Malaysia	Wisma UN, Block C Kompleks Pejabat Damansara Jalan Dungun, Damansara Heights 50490 Kuala Lumpur MALAYSIA	<a href="mailto:registry.my@undp.org">registry.my@undp.org</a>	Email	12 April 2017		√
8	Malaysian National Animal Welfare Foundation – MNAWF	Wisma Medivet, 8, Jalan Tun Razak, 50400 Kuala Lumpur, Malaysia	<a href="mailto:secretary@mnawf.org.my">secretary@mnawf.org.my</a>	Email	12 April 2017		√

**Appendix 2. Assessment Program**

DATE TARIKH	25 – 28 April 2017	
PLANNED TIME PELAN MASA	PROCESSES / CLAUSES TO BE AUDITED PROSES / FASAL YANG DIAUDIT	AUDITOR
<b>Selasa / Tuesday 25 April 2017</b>		
04.25 – 07.25	Travelling from Jakarta to Kuala Lumpur	TNB/SNP
08.00 – 11.00	Travelling from KL to Hotel in Raub (Pahang)	All Auditor Team
14.00 – 15.00	<b>Opening meeting in Bukit Puteri POM</b> <ul style="list-style-type: none"> <li>• Auditee Speech (Introduction of PIC, Profile of Mill and Estates)</li> <li>• Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Determine of Field Visit Audit, Transparency and Confidentiality Clarification)</li> </ul>	All Auditor Team
15.00 – 16.30	<b>Verification on:</b> <ul style="list-style-type: none"> <li>- Time Bound Plan</li> <li>- Parsial certification</li> <li>- Basic information</li> </ul>	
<b>Rabu / Wednesday 26 April 2017</b>		
08.00 – 13.00	Document Audit and Field visit to <b><u>Bukit Puteri PALM OIL MILL</u></b> <ul style="list-style-type: none"> <li>• Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO); Occupational Health &amp; Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond &amp; Land Application of POME)</li> <li>• Interview &amp;FGD with Worker’s Union, Gender Committee, Local Contractor, All Local Communities.</li> </ul>	SNP/TNB  MNZ
13.00 -14.00	<b>Break and Lunch</b>	All Auditor
14.00 – 16.30	<ul style="list-style-type: none"> <li>• Field Observation Verification &amp; Completion of Check List in Mill</li> </ul>	

