

**Roundtable on Sustainable Palm Oil Certification
R S P O**

[✓] Surveillance

Name of Management : Bukit Puteri Palm Oil Mill – SOU 10 subsidiary of Sime Darby Plantation Bhd
 Organisation
 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 : 07 July 2016 Date of License Issue : 07 July 2019
 Date of Certificate Expiry : 06 July 2021 Date of License Expiry : 06 July 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA 1.3	25 to 27 April 2019	Sandra Purba (Lead Auditor), Mahas Maliyapan, Ebnu Holdoon Shawal	Tony Arifiarachman	Octo HPN Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA 1.3	27 May 2019

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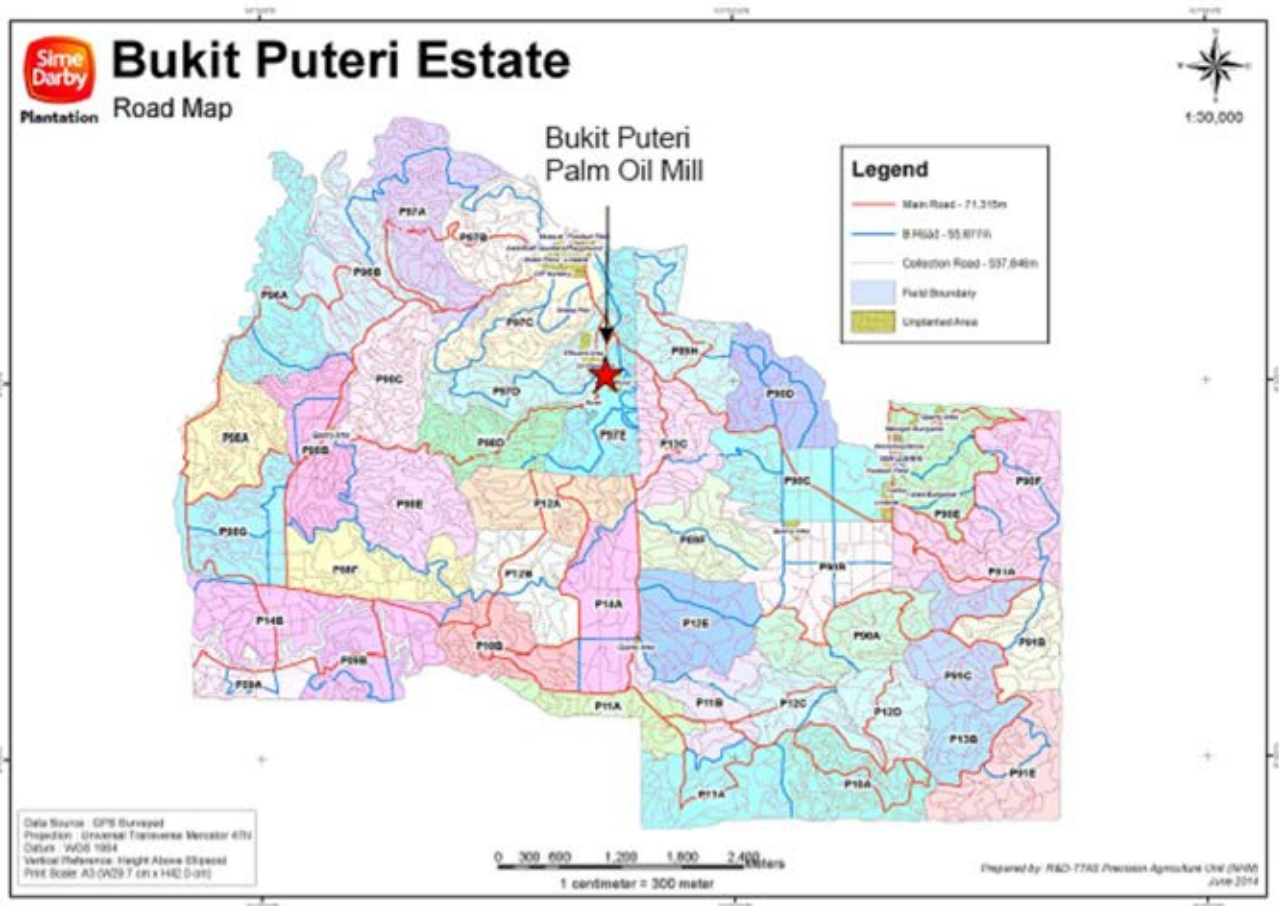
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Figure 1. Location Map of SOU 10, Sime Darby Plantation sdn Bhd



Figure 2. Operational Map of Bukit Puteri Estate



Abbreviations Used

ARM	:	Agriculture Reference Manual
BOB	:	Barn Owl Box
BOD	:	Biological Oxygen Demand
BTS (FFB)	:	Buah Tandan Segar (<i>Fresh Fruit Bunch</i>)
CEC	:	Cation Exchange Capacity
CEMS	:	Continuous Emission Monitoring System
CePPOME	:	Certified Environmental Professional in the Treatment of POME
CH	:	Certificate Holder
CHRA	:	Chemical Hazard Risk Assessment
CLC	:	Child Learning Centre
COBC	:	Code of Business Conduct
COD	:	Chemical Oxygen Demand
CPO	:	Crude Palm Oil
CSA	:	Conservation Site Area
CSR	:	Corporate Social Responsibility
DOE	:	Department Of Environmental
EFB	:	Empty Fruit Bunch
EMS	:	Environment Management System
EPSM	:	Environmental Protection Society Malaysia
EQMS	:	Environment Quality Management System
EQT	:	Environment Quality Act.
ESH	:	Environment Safety and Health
ETP	:	Effluent Treatment Plant
EVIT	:	Each Vehicle Type
FFB	:	Fresh Fruit Bunches
FPIC	:	Free Prior and Informed Consent
FY	:	Financial Year
GHG	:	Green House Gases
HCV	:	High Conservation Value
HIRAC	:	Hazard Identification Risk Assessment and Control
HQ	:	Head Quarter
HSE	:	Health Safety and Environment
IPM	:	Integrated Pest Management
IUCN	:	International Union for Conservation of Nature
JKKP	:	Jawatan Kuasa Kesihatan dan Keselamatan Pekerjaan (OSH Committee)
KER	:	Kernel Extraction Rate
KKS (POM)	:	Kilang Kelapa Sawit (Palm Oil Mill)
LC	:	Land Clearing
LCC	:	Legume Cover Crop
LD	:	Lethal Dosage
LOTO	:	Log Out and Take Out
LTA	:	Lost Time Accident
MPOB	:	Malaysian Palm Oil Board
MQMS SOM	:	Mill Quality Management System Standard Operation Manual
MSDS	:	Material Safety Data Sheet
NCR	:	Non Conformance Report
NPP	:	New Planting Procedure
NUPW	:	National Union Plantation Workers
NWSDM	:	National Council of Welfare & Social Development Malaysia
OER	:	Oil Extarction Rate

OFI	:	Opportunity For Improvement
OHS	:	Occupational Health and Safety
OHSA	:	Occupational Health and Safety Assessment
OSH	:	Occupational Safety and Health
P & D	:	Pest(s) and Disease(s)
P&D	:	Pest(s) and Disease(s)
PANAP	:	Pesticide Action Network Asia and the Pacific
PK	:	Palm Kernel
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment(s)
PSQM	:	Plantation Sustainability and Quality Management
PSS	:	Pictorial Safety Standard
RHB	:	Rashid Husin Bank
RSPO	:	Roundtable Sustainable Palm Oil
RSPO	:	Roundtable on Sustainable on Palm Oil
RTE	:	Rare, Threatened or Endangered
SAP	:	System Application Product and Processing
SDP	:	Sime Darby Plantation
SIA	:	Social Impact Assessment
SOCISO	:	Social Security Organization
SOM	:	Standard Operation Manual
SOP	:	Standard Operating Procedure
SOU	:	Strategic Operating Unit
SPMS	:	Sustainable Plantation Management System
SW	:	Schedule Waste
TQEM	:	Total Quality Environmental Management
USD	:	United States Dollar
USECHH	:	Use and Standard of Exposure of Chemicals Hazardous to Health
WHO	:	World Health Organization
WI	:	Work Instruction
WTP	:	Water Treatment Plan

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> • Malaysian National Interpretation of RSPO Principles and Criteria for Sustainable Palm Oil Production. Endorsed by RSPO Board of Governors 6 March 2015. • RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 for CPO Mill • RSPO Certification System for Principles and Criteria, 14 June 2017 	
1.2	Organisation Information		
1.2.1	Organization name listed in the certificate	Sime Darby Plantation Bhd	
1.2.2	Contact person	Shylaja Devi Vasudevan Nair	
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 RSPO member	September 8, 2004, 1-0008-04-000-00	
1.3	Type of Assessment		
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	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Bukit Puteri Palm Oil Mill	K/B31, Sungai Koyan, 27650 Raub, Pahang Darul Makmur, Malaysia	04° 12' 09" N 101° 51' 45" E
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Bukit Puteri Estate	K/B31, Sungai Koyan, 27650 Raub, Pahang Darul Makmur, Malaysia	04° 12' 40" N 101° 51' 40" E

1.5	Description of Area Statement						
1.5.1	Tenure						
	• State		3,875.78			Ha	
	• Community		-			Ha	
1.5.2	Area Statement						
	• Total area		3,875.78			Ha	
	• Mature area		2,681.37			Ha	
	• Immature area		1,114.21			Ha	
	• Mill		5.39			Ha	
	• Infrastructure and workers line-site		44.88			Ha	
	• Nursery		8.57			Ha	
	• HCV		21.36			Ha	
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					
					Total		
	1997	510.32			510.32		
	1998	664.58			664.58		
	2009	111.77			111.77		
	2010	180.57			180.57		
	2011	123.30			123.30		
	2012	389.41			389.41		
	2013	239.69			239.69		
	2014	209.69			209.69		
	2015	252.04			252.04		
	Total Mature Area	2,681.37			2,681.37		
	2016	388.83			388.83		
	2017	481.94			481.94		
	2018	243.44			243.44		
	Total Immature Area	1,114.21			1,114.21		
	TOTAL	3,795.58			3,795.58		
1.6.2	New Planting area after January 2010		-			Ha	
1.6.3	Planting Cycle		2 nd Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)

	Bukit Putri	20	68,023	14,024.67	20.74	2,951.55	4.34
	<i>*Production data source from April 2018-March 2019</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Bukit Putri	3,875.78	3,795.58	46,169	12.16	46,169	100
	TOTAL	3,875.78	3,795.58	46,169	12.16	46,169	100
	<i>*Production data source from April 2018-March 2019</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organisation	Number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Sg Mai (RSPO Certified)	SOU11, Sime Darby Plantation Bhd	-	-	1,078		
	Kerdau (RSPO Certified)	SOU11, Sime Darby Plantation Bhd	-	-	249		
	Green Agro (Non-certified)	Independent outgrower	-	-	1,369		
	Nak (Non-certified)	Independent outgrower	-	-	4,739		
	Pertiwi (Non-certified)	Independent outgrower	-	-	11,051		
	Ck Teik Ent (Non-certified)	Independent outgrower	-	-	3,368		
	TOTAL					21,854	
	<i>*Production data source from April 2018-March 2019</i>						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Estimate Tonnage of Certified Product						
1.8.1	Past Annual Claim Certified Product			Previous Certificate Claim Last year period (tonnes/year)	Actual certified product Last year period (tonnes/year)		
	• FFB Production			48,576	46,169		
	• CPO Production			10,507	9,822.45		
	• Palm Kernel (PK) Production			2,589	2,068.44		
1.8.2	Product selling						
	Tonnage of selling product			Period of actual selling product for last year			
	• CSPO sold as RSPO certified product			-			
	• CSPK sold as RSPO certified product			-			
	• CSPO sold under other scheme			-			
	• CSPK sold under other scheme			-			
	• CSPO sold as conventional			8,798.40			
	• CSPK sold as conventional			2,068.44			
1.8.3	Estimate of Certified FFB Claim						
	Name of Estate(s)	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Bukit Puteri	3,875.78	3,795.58	49,343	13		

TOTAL		3,875.78	3,795.58	49,343	13			
<i>*Projected FFB production 07 July 2019 to 06 July 2020</i>								
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Bukit Puteri	20	49,343	10,855	22	2,467	5	MB
<i>*Projected CSPO and CSPK production 07 July 2019 to 06 July 2020</i>								
1.9	Other Certifications							
	Others			MSPO				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Supply Base	Time Bound Plan	HGU on Process		Location	Status
	Mill	Time Bound Plan			Ha	Time Bound Plan		
INDONESIA								
	Sekunvir. PT. Indotruba Tengah	2010	Sekunvir	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	1,652	2019	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	421.31	2020	Pekanbaru, Siak District – Riau	Certified
			Pinang Sebatang	2011				Certified
			Aneka Persada	2011				Certified
	Sungai Pinang. PT. Bina Sains Cemerlang	2012	Sungai Pinang	2012	308.25	2020	Musi Rawas District – South Sumatera	Certified
			Bukit Pinang	2012				Certified
	Pematang. PT. Teguh Sempurna	2011	Pematang	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	765	2020	Kotabaru District – South Kalimantan	Certified
		Gunung Kemas	2011				Certified
		Laut Timur	2011				Certified
		Pantai Timur	2011				Certified
		KKPA BSS	2020				-
Bebunga. PT. Langgeng Muaramakmur	2011	Sungai Cengal	2011	1,162	2020	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	1,120	2020	Kotabaru District – South Kalimantan	Certified
		Pondok Labu	2012				Certified
		Rampa	2012				Certified
		Sesulung	2012				Certified
Selabak *) PT Swadaya Andhika	2012	Selabak	2012	63	2020	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	1,639	2020	Muaro Jambi District - Jambi	Certified
		Plasma BGR	2020				-
Rantau Panjang. PT Guthrie Pecconina Indonesia	2012	Rantau Panjang	2012	4,133	2020	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	2020				- (Not yet)
Blang Simpo. PT Perkasa Subur Sakti	2013	Tamiang (PT PPP)	2013	1,286	2020	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	2020			Sanggau District – West Kalimantan	-
		MAS 1	2020				-
		MAS 1	2020				-
		Plasma MAS	2020				-
Lembiru. PT Sandika Nata Palma	2014	Lembiru	2014			Ketapang District – West Kalimantan	Certified
		Awatan	2014				Certified
		Karya Palma	2020				-
		KKPA SNP	2020				-
		Pelanjau (PT BAL)	2020				-
		Sungai Putih (PT BAL)	2020				-
		Baturus (PT BAL)	2020				-
		KKPA BAL	2020				-
MALAYSIA							
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 SOU 8	2010	East	2010			Carey Island, Selangor	Certified
		Dusun Durian	2010				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	2011	Labu	2011			Nilai, Negeri	Certified

SOU 13		New Labu	2011			Sembilan	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	Tingkeyu	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
LIBERIA							
Grand Cape Mount	2017	Matambo (2,500 Ha)	2017			Grand Cape Mount, Liberia	NPP May 2011
		Grand Cape Mount (2,372 Ha)	2017				NPP May 2011
		Zodua (264)	2017				NPP May 2011
		Bomi (3,128 Ha)	2017			Bomi, Liberia	NPP May 2011
		Lofa	2017				NPP May 2011

		(2,254 Ha)				
P & G (New Britain Palm Oil)						
Poliamba	2012	Kara	2012		Kevieng, New Ireland Province, P&G	Certified
		West Coast	2012			Certified
		Nalik	2012			Certified
		Noatsi	2012			Certified
		Madak	2012			Certified
		North (Smallholders)	2012			Certified
		South (Smallholders)	2012			Certified
		West (Smallholders)	2012			Certified
Tetere	2011	Tetere	2011		Gudaicanal, Slomon Island	Certified
		Ngalimbiu	2011			Certified
		Mbalisuna	2011			Certified
		West Zone (Smallholders)	2011			Certified
		Central Zone (Smallholders)	2011			Certified
		MBA East (Smallholders)	2011			Certified
		MBA West (Smallholders)	2011			Certified
Sangara, Sambiripa & Mamba	2013	Sangara	2013		Higaturu, Popondetta, Oro, P&G	Certified
		Sumberipa	2013			Certified
		Ambogo	2013			Certified
		Embi	2013			Certified
		Mamba	2013			Certified
		Sorovi (smallholders)	2013			Certified
		Igora (smallholders)	2013			Certified
		Saiho (smallholders)	2013			Certified
		Aeka (smallholders)	2013			Certified
		Ilimo (smallholders)	2013			Certified
Gusap	2010	Dumpu	2010		Madang, P&G	Certified
		Surinam	2010			Certified
		Jephcott	2010			Certified
		Gusap	2010			Certified
		Paddox	2010			Certified
		Ngaru	2010			Certified

			Madang VOP (smallholders)	2010			Certified
			Morobe VOP (smallholders)	2010			Certified
	Hagita	2013	Giligili	2013		Milne Bay, P&G	Certified
			Hagita	2013			Certified
			Waigani	2013			Certified
			Sagarai	2013			Certified
			Padipadi	2013			Certified
			Mariawatte	2013			Certified
			East Gurney	2013			Certified
			West Gurney	2013			Certified
			East Sagarai	2013			Certified
			West Sagarai	2013			Certified
	•Mosa	2008	Bebere	2008		West New Britain	Certified
	•Kumbango		Kumbango	2008			Certified
	•Kapiura		Togulo	2008			Certified
	•Namumdo		Dami	2008			Certified
	•Waraston		Waisisi	2008			Certified
			Kautu	2008			Certified
			Karaisu	2008			Certified
			Moroa	2008			Certified
			Bilomi	2008			Certified
			Loata	2008			Certified
			Haella	2008			Certified
			Garu	2008			Certified
			Daliavu	2008			Certified
			Sapuri	2008			Certified
			Malilimi	2008			Certified
			Rigula	2008			Certified
			Nomundo	2008			Certified
			Navarai / Karato ME	2008			Certified
			Volupai . Lotomgam / Natupi / Goruru	2008			Certified
			Lolokoru	2008			Certified
			Silovoti	2008			Certified
			LSS Hoskin (1,877 Smallholders)	2008			Certified
			VOP East (1,815 Smallholders)	2008			Certified
			VOP Central (1,958 Smallholders)	2008			Certified
			VOP West (1,277 Smallholders)Kaulong / Akamie / Pusiki / Repamira / Sakapei / KDC ME (21 large	2008			Certified

	smallholders)				
	LSS Kapiura (847 Smallholders)	2008			Certified
	VOP Kapiura (551 Smallholders)	2008			Certified
<p>Sime Darby has achieved 34 management units in Malaysia, 24 mmanagement units in Indonesia, 10 management units in Liberia that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 10 in Liberia. In the year of 2017 there are two Mill that are no longer operating, and for the supplying base (Estate) is diverted to a mill that is still operating and has been certified RSPO.</p> <p>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 Sime Darby Plantation Bhd 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 Kelapa Sawit (SPKS) Sanggau, however the improvement are in progress. Sime Darby has informed the Time Bound Plan progress, MUTU has consider that Sime Darby still comply with the RSPO requirement for partial certification.</p>					
1.10.2	Progress of Associated Smallholders and Outrowers for Certifiable Standard				
	There is no scheme smallholder under SOU 10 SDP.				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.3	<p>1. Sandra Purba (Lead Auditor). Sandra Purba (Lead Auditor). Graduated from Forestry Faculty Bachelor Degree, majored in Forest Product Technology. Have experience working in industrial forest company, mining and oil palm plantations company for 6 (six) years as EHS and Sustainability Assistant. Has been certified as General OHS Expert, attend and passed the several trainings of management system (OHS, environment and quality management), has been attend the training of waste management, GHG verification and validator training, and conflict resolution and mapping training. Have been successfully passed the Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training course, RSP0 lead auditor training course and auditor of RSP0 Next, SCCS LAT and SA8000. Involve in many audit activities of similar scheme (ISPO and MSPO) since April 2013 covering the Legal Aspect, Environmental aspect, Social Aspect, Health and Safety Aspect, conservation and Worker Welfare. During this audit, she verified agronomy and FFB processing, long term business plan, social and SCCS.</p> <p>2. Mahas Maliyapan. Malaysian citizen (Fluent in Local Language), More than 15 years working experience in various industries in Malaysia that covering the full spectrum of Quality and Environmental Management System. As certified Lead Auditor and being the Principle Consultant. He too has vast exposure and experience in Quality Environmental Management System as well the Occupational, Health and Safety auditing. He owns proven track records of auditing various multinational companies both locally and internationally. In this assessment, He assessed on Legal / Land Use, worker welfare, and social</p> <p>3. Ebnu Holdoon Shawal. Malaysian citizen (Fluent in Local Language) Graduated with Bachelor of Civil Engineering from University Tenaga Nasional in Malaysia. He has been completed the ISO 9001: 2008 QMS Lead assessor course for RABQSA – QM 785 (Exemplar Global) certified. He has an experience regarding the safety, health and environmental standard for construction works as an engineer for 1 year. He has gone for various RSP0 audit since 2015. During this audit he has been assigned to verify the Transparency Information, OSH & Environment/GHG.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.3	<p>Number of auditors : 3 auditors Number of days for ASA-1.3 at site : 3 days Number of working days for ASA-1.3 at site : 9 Working days</p>
2.2.2	Assessment Process
ASA-1.3	<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 Malaysia National Interpretation - RSP0 MY-NIWG of Principles and Criteria (P & C) for Sustainable Palm Oil Production and RSP0 Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSP0 Board of Governors on 21 November 2014, Revised on 14 June 2017 (Module E for CPO Mill)</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 ASA-1.3 delivered by the MUTU auditor to the Management Unit and the results are the subject will be verified at the next assessment phase (ASA-1.4).</p> <p>Improvement of findings from main assessment findings were observed by auditors at this ASA-1.3 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.3.</p> <p>The assessment program please find Appendix 2</p>
2.2.3	Locations of Assessment
ASA-1.3	<p>Bukit Puteri POM</p> <ul style="list-style-type: none"> Security post: Supply Chain Certification System (SCCS) verification and interview related personnel in charge (1 person) to supply chain system

- **Weight bridge** : Observation and interview of personnel (2 person) related to FFB received mechanism and documented system of Certified and non Certified FFBs
- **Loading ramp**. Interview with 2 graders (has grading license), and observation regarding to the OSH and worker welfare aspect.
- **Boiler room**. Interview with one boiler man and observation regarding to the OSH and worker welfare aspect
- **EFB collection area**. Observation related to solid waste management. Proper control measures available
- **Engine room**. Interview and observation, OSH and safety measures available. No wages issues
- **Depericarper station**. Interview and observation, OSH and safety measures available. No wages issues and no indication of leakages
- **Sterilizer station**. Interview with one operator and observation regarding to the OSH and worker welfare aspect
- **Air compressor**. There was permit and OSH and safety measures available

Bukit Puteri Estate

- **Manuring, Field of 16(B)**. Interview and observation related to OSH and workers welfare. No wages issues, housing in proper, PPE allocated, Union contributed
- **Spraying activity, field of 2016C**. Interview to 7 workers, observation regarding to OSH, training and waste management
- **Harvesting, field of 98C**. Interview to 2 workers, observation regarding to OSH, workers welfare, training and SOP implementation
- **Riparian area of Telang River, field of 09 A**. Observation related to HCV management
- **BOB, field of 98B**. Observation related to IPM
- **Landfill**. Observation related to domestic waste management
- **Boundaries**. Observation related to legal border, no indication of over-planted
- **CSA area, no planting above 25 Degree**. Erosion prevention measures are available
- **Nursery Area**: Observation on nursery activities and management.
- **Pesticides store**: Proper storage of store sighted. MSDS and labelling available. Good explanation from the store keeper. Pesticides has been arrange accordingly to their class and active ingredient. There are also fan ventilator made available at the chemical store. Sighted the chemical mixing area properly build at separate building of the estate office.
- **Fertilizer store**: Proper stacking of fertilizer. Signage and label available including MSDS. The store keeper is well trained and understand the hazardous material.
- **Schedule waste store**: Had been kept and arranged in accordance with requirement of DOE such as SW 409-spent filters, rags, SW 305 lubricant, hydraulic oil and SW 410, labelling sighted and the workers are well trained to explain the process of scheduled waste management
- **Water treatment plant**: Had been build at the estate and mill. The company had filtered the water and supplied to the workers quarters of the mill and usage of workers in the mill.
- **Housing complex**: Sighted a terrace house in the workers quarters including the facilities like field and creche sighted, there are 2 dedicated general workers to ensure the facilities are clean and well managed.

Interview with stakeholder:

1. Board of Gender Committee
2. Worker Representation
3. Contractor of *Fresh Fruit Bunch* (FFB) loading
4. Head village tok Empat

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.3	Summary of stakeholder consultation process Consultation of stakeholders for SOU10, Sime Darby Plantation Sdn Bhd was held by: <ul style="list-style-type: none"> • Public Notification on Mutu certification website on 27 March 2019 • Stakeholder Consultation by email to related NGOs in Malaysia by e-mail on 16 April 2019 • Public consultation meeting with internal stakeholders by interviews and local stakeholders conducted by interviews

	during the audit on 26 April 2019 in Bukit Puteri Estate
	Numbers of input from stakeholders were verified by auditors through field observation and document verification
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (ASA-1.4) will be determined nine months after the license issued.

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 two (2) NCR assigned against minor Compliance Indicator and four (4) opportunities for improvement were identified.

Further explanation are provided in section 3.5. The effectiveness implementation related to RSPO P & C compliance 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 Malaysia National Interpretation (MY-NI) of the RSPO Principles and Criteria for Sustainable Palm Oil Production. Endorsed by RSPO Board of Governors 6 March 2015 and RSPO Supply Chain Certification Standard for organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014, revised on 14 June 2017 (Module E for CPO Mill)

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY	
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.
1.1.1	<p>During the audit at Sime Darby Plantations Mill and estate, the company had shown the latest stakeholder list at the estate and the frequency of updating stakeholder list had been made annually concurrently with stakeholder consultation in Bukit Puteri Mill and Bukit Puteri estate at Bukit Puteri Club house. The stakeholder meeting had been done on 19th February 2019 and invitation letter sighted on 28th January 2019 to the relevant stakeholder’s including government servant and local head. Issues related to the response and request had been documented on stakeholder consultation document prepared by the Medical assistant of Bukit Puteri Estate [Mr Asyraf] Sighted the stakeholder list updated for year 2019 which include :</p> <ul style="list-style-type: none"> i) 17 Contractors ii) 22 suppliers iii) 4 local community heads : MPKK – RTP Sg Ular , kampung Lubuk Kulit , Kampung keledok, Kampung Beletik iv) 27 Intereseted parties – government Sectors (SK LKTP Sungai Koyan , SMK Sungai Koyan, Balai Polis Padang tengku , Hospital Kuala Lipis, Telekom Malaysia, MPOB, Tanah Makmur Estate <p>During the annual stakeholder meeting, all the latest information regarding the company policy, information related to estate and mill activities, social and environmental issues has been publicly discussed with related stakeholders. The stakeholder can voice out their concern regarding the management operations and the issues during the meeting and the matters had been taking into account by the management unit. Based on the SOP of Sime Darby management, the manager are the responsible person to update and approved all the request and communicate externally to the stakeholders. However the personnel in charge also been appointed for each estate and mill in accordance to Sime</p>

Darby procedure. Sighted the letter appointment for each estate to handle grievances and complains. Amongst the stakeholders invited to the meeting is managers of all estate and mill, village leaders, auxiliary police, NUPW personnel and representative, contractors, local community leaders from nearby villages, vendors and supplier of the company.

1.1.2

The Company had provide and SOP of constructive responses to the stakeholders kept in the management office unit entitled 'Standard Operating Manual' – Communication procedure. The manager of the estate will be the responsible person to communicate with external stakeholder upon request of information and for internal communication will be handled by the assistant manager of each estate and mill. As for internal communication, the company had provide a dedicated complaint book internally and external complaint book for handling complain and request by stakeholders and workers and most recent request made by the workers of mill on October 2018 regarding the repair of their house. Sighted the company had maintained the complain book internally and the list of complain had been recorded by the Medical Assistant of the estate. Based on the observation made, the company had respond towards the complaint and request as per procedure of Sime Darby repairing the faulty equipment and the response from management had been made on the same day of complain made.

Status: Comply

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.

The management has made publicly available the related document listed by the standard. It includes the Land title of the management unit (mill and supply bases), OSH plan of the mill and estate, risk assessment, mitigation plan (HIRARC document), Environmental Impact evaluation (EIE) and Environmental Management Plan (EMP) were made available at the estate and mill.

Sime Darby Plantation SOU Bukit Puteri had also documented the Social Impact Assessment (SIA) at estate and mill accordingly, together with HCV document [made on 2015 for Pahang Region] for the wildlife and water catchment area, Pollution prevention Plan (PPR), communication procedure to internal and external parties, and also including the Human right policy that made available at all estate and management unit of Sime Darby as per field visit and document verification.

Status: Comply

1.3

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

The company had updated the latest booklet Code of Business Conduct (COBC) for year 2018 and being distributed to all the workers and staff management of Sime Darby SOU Bukit Puteri and estates under the management. Record of handing booklet also made available at the estate management in which all the personnel that receive the booklet will signed a form of acceptance and the record kept in the office. Record of booklet signed and attendance sighted at the office estate dated 27th September 2018 and the company had brief the all workers and staff accordingly during muster morning and training period. All together mill and estates personnel including the general workers had signed the form of booklet acceptance during their employment and keep it in their own personal file.

Sighted the training safety policy and COBC had been given refresher training dated 16th April 2019 at meeting room – designation : Assistant manager , Mill Charge hand , technician operation

- i) Second training done 1st March 2019 – attended by 6 workers and assistant manager at Meeting room mill
- ii) Sighted the training on Sime Darby Policies and COBC (new workers) had been done 5th January 2019 at 10.00 am meeting room

The COBC booklet has been made into slideshow presentation and has been brief to all the workers and management staff. The booklet included the element of 'prohibition any kind of corruption 'and' zero tolerance towards bribery and

corruption or else not influencing other parties to practice the corruption in the company management unit. Stated the clause regarding guarding against bribery and corruption which are the group take a zero approach towards bribery and corruption and is committed behaving professionally, fairly and with integrity in all our businesses dealing and relationship wherever the Group operate and implementing and enforcing effective system to counter bribery and corruption. The contractor has been provided the booklet when they signing the contract and the elements key point of the booklet has been inserted together with the contract.

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

During mill visit, sighted the mill effectively compliance to OHS and environmental concerning regulations. The required permits and licenses were verified for compliance. In estate, a legal register available that indicates the applicable legal requirements that to be complied. Sampled the permits and licenses found in good order. Among the verification done for D.O.E annual license renewal, license for authorized schedule waste collector, license for water source, Isokinetic stack sampling, annual & Baseline Audiometric Testing, competent persons and etc.

2.1.2

For mill, there is annual RSPO Internal Consultative Assessment by the PSQM. Seen the assessment covers requirements such as Fire Services (Fire Certificate) Regulations 2001, Occupational Safety and health Act 1994, Environmental Quality Act 1974, Factories, and Machinery (Safety, Health, and Welfare), Factories and Machinery (Noise Exposure) Regulations 1989, etc. An internal assessment by Mill Asst Manager dated on 01/0319 with 5 criteria [SH, environment, water, HRM and other requirements] resulted with 100% compliance.

As for the estate, the Operating Manual [appendix 5.2.4a] serves as guideline on how to monitor the progress of applicable laws and regulations. Asst. manager update if there are any changes in the legal requirements, sighted his appointment letter dated on 01/07/2017. Among the LORR evaluated were Classification, Labelling & Safety Data Sheet of Hazardous Chemicals Reg 2013, Pesticide Act 1974 (Act 149), Electrical Supply Act 1990 (amended 2015), *Akta Kesatuan Kerja* 1959, Immigration Act 1959, Passport Act 1966, Employee Provident Fund Act 1991, Weight and Measures Regulations 1981 (Act 71), Water Management Authority (Licensing) Regulation 2012 and etc.

2.1.3

In the mill, any new laws or regulations that needs to be comply shall be issuing of a new matrix that required to be review annually. Seen a compliance checklist established for monitoring of environment, safety, and health, etc. Sighted the Internal Audi Report for SOU 10 dated on 25-27/09/18 with 8 Major findings with 3 related to Legal Compliances. In the estate, the internal audit report dated 25-27/09/18 resulted with various findings that inclusive of non-conformance against applicable legal requirements such as renewal of foreign worker's insurance and etc. There was 8 major and 2 minor findings resulted from the audit has been closed prior to CB assessment.

2.1.4

In the mill, seen the identification of changes is the responsibility of corporate department in HQ whom shall notify in written to the mill representatives of the changes. It then the PIC in the mill to delegate the information within the related mill staff. In estate, sighted the Internal audit report dated 25-27/09/18 resulted with various findings. The Estate Asst been appointed to source of info and update for tracking changes and communication of changes to relevant sections of the legislation to estate personals.

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

This POM is located on HD(S) 238, Lot 1277 that in Bukit Puteri Estate is owned by Sime Darby Plantation and therefore no presence of any land disputes. As for estate, based on the area statement, updated as at Jan 2019 the estate has single crop [oil palm]. The total titled area is 3,844.51 Ha / total panted area 3795.58 Ha (matured 2681.37 Ha+ immature 1114.21 ha), consisting of 5 land titles - lease and valid for 99 years. There are updates made on the land status and audit team has verified with no negative findings.

2.2.2

This POM is on the land of Bukit Puteri Estate. During mill visit, sighted the effluent area is fenced, there are security personals monitoring the perimeter and certain boundaries with estate with concrete walls. Site visit in estate sighted original boundary stones at Field 17C next to Tanah Makmur plantation that planted with oil palm. As for the other concerning boundaries seen the trenches and fencing well maintained. The estate has undergone a few replanting programs from 2017-2018, sighted the land survey records with GPS co-ordinates from the Land Department prior to felling.

2.2.3, 2.2.4, 2.2.5 & 2.2.6

This POM is on the land of Bukit Puteri Estate. Based on the stakeholder interviews and SIA assessment, the estate has no legality issues on land ownership.

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.

Appendix 05 for "Handling Social Issues" is interlinked to Appendix 03 for "Land or Boundary Disputes" which are applicable if any arising issues from the local communities neighboring the estate or stakeholders or during land surveying process by authorized agencies. During field visit, sighted there is no evidence collected during this audit period for any legal, customary or user rights.

2.3.2, 2.3.3 and 2.3.4

This POM is on the land of Bukit Puteri Estate. Based on the stakeholder interviews and SIA assessment, the estate has no legality issues on land ownership.

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, 3.1.2

Sighted the five years budget for mill period of 2019 – 2023, presented in Management Budget Plan, issued by Mill and Estate Manager in January 2019.

Parameters being projected are hectare statement, replanting, production of FFB, CPO and PK, extraction rate (OER, KER), production cost, mill product quality parameters, administrative cost, maintenance cost, price of products (which available on Head Quarter Office under Global Trading Marketing of Sime Darby, Bhd.), etc.

Interview to estate and mill management representative told that there is no plan of expansion and increment of mill processing capacity in the near future. Furthermore. There is no smallholder scheme and presence of peat soils within SOU-10 operational areas.

Sighted the replanting program for BP Estate, informs: division, field no.: current age, current SPH, felling age, hectares, replanted ha percentages, yield trend, replanting program 17/18, 2019-2024. Based the program, there is no replanting program in 2019.

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, 4.1.2

Bukit Puteri Mill has the SOP for Palm Oil Mill document no.: SDP/SOP/01 version 2, valid since 1 Jan 2019 covering all activity of processing, start from reception station, fruit handling station, sterilization station, threshing station, pressing station, clarification, depericarping, kernel recovery, boiler, power generation, product storage and dispatch, laboratory, oil recovery, water treatment plant, effluent treatment plant and EFB disposal. The SOP also has been describes include environment, safety and health working instruction.

Furthermore, the mill has an SOP of mill housekeeping (SDP/SOMH/01 issued on 1Jan 2019, version of 1.

There is no changes to the oil palm plantation procedure, which presented in document Agricultural Reference Manual (ARM) dated July 1st 2011. The procedures were used by the executives and transferred to the workers through training and socialization.

During field observation to mill and plantation activities such as WB station, store, processing station, loading ramp, harvesting in block of 98C, spraying block of 2016C and manuring in block of 2016B observed that the workers has been aware regarding to SOP and WI.

Monitoring of the procedures consistency implementation conducted by the mill and estate manager routinely, the result are reported in monthly basis. Sighted the report of mill, such as: monthly Estate or Mill Manager Report for period January to March 2019, Mill Advisory Report no.: SOU10/BPM/01/2018 (covers OER achievement, oil and kernel losses, product quality, costing (RM/ton), key challenges, as well as action plans), Plantation Advisory Department report no.: CE/SOU10/BPE/01-1718 (covered yield improvement, crop recovery, OER improvement, replanting and immature palms maintenance) and annual RSPO internal audit by SQM Central East Region Sustainability Unit, PSQM Department dated 25-27 Sept 2018.

4.1.3

Bukit Puteri estate and mill has set the action plan based on the advisory recommendation along with the time frame and responsible PIC, were discussed, analyzed and presented in monthly meeting by Manager.

Monitoring for the action plan are conducted in daily and reported in monthly (production monthly report) and monthly Estate/Mill Manager report which describes general data, production quality, losses, product quality, production cost, manpower, etc.

4.1.4

The traceability procedure of the origins of all third-party FFB source are contained in the SOP of SCC and Traceability, appendix 5 version 2 issued no.: 4, year of 2018.

Sighted the list of third party FFB supplier of BP-POM, which informs: name of supplier, address, contact person, MPOB license and status of RSPO cert/non cert, there was 6 third party supplier.

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, 4.2.2

Soil fertiility management procedure contained in document No. ARM dated July 1st 2011 Section 8 about manuring. The procedure mentioned that fertilizer recommendation shall be considering leaf (foliar) and soil sampling analysis which conducted annually and every five years, respectively.

The estate has fertilizer program for FY2018/2019, contained in the fertilizer recommendation report. The recommendation and program are prepared based on soil testing and leaf testing, which has been done in 25-26 April 2018. The document also informs: field number, block number, hectares, SPH, number of palms, soil series, and rate (Kg/palm).

Monitoring of fertilizer usage has been done and recorded, for e.g. period of 2018/2019, the document informs: division,

field, block, Ha, SPH and type of fertilizer

Both foreman and workers are able to demonstrate the SOP, it was confirmed during interview and field observation to manuring activity in block of 2016B, mentioned that training are conducted routinely by the assistant during morning roll-call. As well as seen that the estate has been conduct the fertilizing in accordance with the recommendation. The workers were able to explain the SOP and fertilizer rate.

Based on observation to immature area, field of 2017D, it seen that the estate has conduct circle EFB mulching (14kg/palm) and cover crop planting by *Mucuna bracteata*.

4.2.3, 4.2.4

Procedure of leaf and soil sampling is presented in document No. ARM dated July 1st 2011 Section 8 about manuring. The procedure mentioned that fertilizer recommendation shall be considering leaf and soil sampling analysis which conducted annually and every five years, respectively.

The estate has conduct the leaf testing on 25-26 April 2018, by the Central East Region Plant Nutrition & Protection, Nutrient being measured on the laboratory testing are N, P, K, Mg and B.

A soil analysis report are sighted, report no.: S44/2019 (25 March 2019), the report informs: soil depth, soil texture, pH, P content (P₂O₅), Organic C, Total N, exchange of Na, K, Ca and Mg, and cation exchange capacity (CEC). The analysis are done by Sime Darby Research Sdn Bhd, lab services laboratory – R&D center.

Agronomist has recommend EFB application which presented in document of Agronomic and Fertilizer Recommendation Report FY2019, as well as application of CCM 45 and MOP for second semester.

Based on observation to immature area, field of 2017D, it seen that the estate has conduct circle EFB mulching (14kg/palm) and cover crop planting by *Mucuna bracteata*.

Status: Comply

4.3

Practices minimize and control erosion and degradation of soils.

4.3.1, 4.3.2

The CH shows several map which informed soil suitability for oil palm plantations as follows:

- Detailed soil map with scale 1:30,000 which informed there were nine soil series within SOU-10 Bukit Puteri operational areas
- Slope and contour map with scale 1:30,000 which informed distribution of slope condition in SOU-10 Bukit Puteri
According to the map, it could be concluded that mainly terrain condition were undulating to hilly and dominated by rolling condition. Hilly to steep areas were covered about 3 % from total Bukit Puteri Estate areas, and there are no presence of peat soil within estate operational areas

Bukit Puteri Estate has a strategy to reduce erosion by doing terracing as seen in the field of 2018D, in addition the estate has planted cover crops (*mucuna bracteata*) in immature areas.

4.3.3

The estate has monthly program road grading, informs among others: program vs actual, field no.: Ha, schedule (Jan-Dec 2019), rate (RM/Ha) and total RM. For example, on March 2019 in Division A, the maintenance are programmed in Field of 2015C as much as 100.62Ha, the actual implementation has been done as much as 73.93 ha. During field observation, the auditor observed that the road condition in BP estate were considered satisfactory.

4.3.4, 4.3.5, 4.3.6

Based on detailed soil map review, information from estate management and field observation to Bukit Puteri Estate, could be concluded that there were no presence of peat soils within SOU-10 Bukit Puteri operational areas. Hence, this Indicator is not applicable

Status: Comply

4.4

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

4.4.1

Based on document review, water management plan are explained in Water monitoring procedure (document ID: SD/SDP/PSQM(EHS)/203-EN4 dated 26/02/2015) & Sustainable Plantation Quality Management System / SPQMS Appendix 07 dated 01/11/2008. Water management such as: conduct water river and effluent discharge quality analysis to accredited laboratory according to Quality Standards for Malaysia. Sighted also the reserve / river buffer zone and Slope Protection procedure (SPQMS Appendix 14 dated 01/01/2010). Water management among others is conducted through protection of water courses and from Telang river and stored in water catchment. Sighted the field had been upkeep, including maintaining and restoring appropriate riparian buffer zone or before replanting along the natural waterways within the estate. Based on interview with management representative, there are no changes to procedures related to the water management plan for the estate.

The company has water monitoring procedure with document ID: SD/ SDP/ PSQM (EHS)/ 203-EN4 dated on 26/02/2015 and Sustainable Plantation Quality Management System / SPQMS Appendix 07 dated on 01/11/2008. Water management such as conducted by water river quality analysis to accredited laboratory according to Quality Standards for Malaysia. The company has conducted water management in accordance with the procedure i.e. conducted water river analysis to accredited laboratory (Sime Darby Research Laboratory Carey Island) with latest record of water result analysis for 8th March 2019 to microbiologist at Sime Darby research Carey Island at house .Based on the result tested on parameter :

- a) Water sample WTP : PH = 2.5 , TDS = 140, NTU = 1.0, Chloride = 16, Al = 0.162
- b) Water sample house division = PH =7.3, TDS = 120, NTU = 1.9 , Chloride =16, Al = Mg/l

Natural water ways	Parameters	Standard quality
	PH	6-9
	SS	50
	BOD	3
	COD	25
	AN	0.3
	DO	5.0 – 7.0
	P	0.2
Domestic use	PH	6.6-9
	NTU	5
	TDS	1000
	CL	250
	AL	0.2

The test results are in accordance with The Natural Water Quality Standards for Malaysia (NWQS) & Water Quality Index (WQI).

4.4.2

The company has Reserve / River Buffer Zone and Slope Protection procedure (SPQMS Appendix 14 dated on 01/01/2010). Water management among others is conducted through protection of water courses and wetlands, including maintaining and restoring appropriate river buffer zone or before replanting along the natural waterways within the estate. The SOP of river buffer as per procedure Sime Darby Plantation in Accordance with Department of Irrigation and Drainage guideline as per below :

River width with river bank	River reserve / river buffer
------------------------------------	-------------------------------------

➤ 40m	50m
• 20-40 m	40m
• 10-20m	20m
• 5-10m	10m
• 3-5m	5m
• <3	-
➤ 3m (sabah)	Buffer zone of 20m shall be maintained, both sides and riverside

Sighted the water catchment area at Bukit Puteri Estate had been protected with bund and fencing all around the catchment with proper signage of no fishing, no spraying and no swimming. Sighted the water test result on 14th march 2019 :

Sample Ref	PH	BOD	COD	SS	AN	DO	P
Water sample – point 1	7.2	<1	12	2	<1	2.6	0.013
Water sample point 2	7.1	3	12	4	<1	2.61	0.012
Water sample point 3	7.1	1	8	4	<1	2.65	0.02
Water sample point4	7.0	3	24	18	<1	2.5	0.029
Water sample point 5	7.4	4	36	14	<1	2.41	0.02

Based on field observation at Sg Bukit Puteri it is verified that the river buffer zone area are protected by the signages and signboard available in the estate, and as per indication there is no spraying application is permitted at these palms. It was confirmed through interview with sprayers from Bukit Puteri Estate that, no spraying is applied on these buffer zone area. Estate management has also installed signboard in the field such as in main road, collection road, riparian buffer zone with information mentioned in the signboard regarding river protection from hazardous waste, chemical activity and others types of activities to be avoided .

4.4.3

The company has water monitoring procedure with document ID: SD/ SOP/ PSQM (EHS)/ 203-EN4 dated on 26/02/2015. Water management such as conducted by effluent discharge quality analysis to accredited laboratory according to quality standards for malaysia.

Bukit Puteri POM had conducted effluent discharge quality analysis to accredited laboratory (Sime Darby Research Laboratory Carey Island) with latest report sighted on January - March 2019. Based on the document, the test results are in accordance with quality standards for Malaysia (BOD < 100 mg/l). According to interview with Mill Manager and observation on the field observation, there are effluent treatment plant:

- One unit raw pond

- Two unit mixing ponds
- Two unit anaerobic ponds
- One unit aerobic ponds

Based on interview with management representative, it is known that the mill effluent analysis was conducted once a month. And based on the online monitoring report to Department of environment Malaysia, sighted the data send is in line with legal compliance of the mill operation [water course discharge BOD <= 100]

Online Environmental reporting available to DOE : 1st week of March 2019 :

Sample	PH	BOD	SS	TN	AN	O& G (mg/l)
Raw pond	5	42340	40400	290	62	17447
Mixing pond 1	5	38300	27500	311	59	11469
Mix pond 2	5.6	278	26000	249	190	10349
Aerobic pond 1	7.6	328	580	290	161	4
Anerobic pond 2	7.8	347	250	243	236	7
Aerobic pond	8.7	113	280	129	70	5

Mill has license from DOE to discharge the final effluent to watercourse with max effluent must less 100 BOD of discharge to watercourse.

4.4.4

The Palm Oil Mill used a treated water from Water catchment at the Bukit Puteri Estate from Sungai Telang for water consumption in the mill and estate. In the license is not mentioned the maximum volume that can be used by the factory. But based on Water Treatment Plant Meter Reading and Meter Analysis Record Book, it is known that the water management (efficient use of water) conducted through water consumption in accordance with the budget set up by palm oil mill management. Sighted the record of water usage per ton FFB for year 2019

month	Water used	FFB	Ratio
January	10330	6359.08	1.62
February	9966	6304.04	1.58
March	12270	70780.99	1.73
		Average 3 months	1.64

Based on field observation at Water Treatment Plant (WTP) station, it is known that the operator has recorded water consumption through observation at measuring instrument (flow meter).

Status: Comply

4.5

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

4.5.1

Integrated Pest Management for rats are applied according Section 15 to the Sime Darby Agricultural Reference Manual issued on 1st July 2011. In the procedure has explain regarding to the caterpillar, rhinoceros beetle, rat and *ganoderm*, and also explained regarding to it control method such as beneficial plant, BOB installation and chemical application if there is the attack exceed the threshold (based on census).

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 20%. The estates shown the rat baiting record FY2019, for example in field of 17C Div A, date start 31 Jan 2019, number of baits placed round 1: 17539 (100%); round 2, placed 11000, result : 62.71%, date: 4 Feb 2019; round 3, placed 3500, result: 19.95%, date: 7 Feb 2019.

Furthermore, the estate has controlled the rat attack using biological enemies, as observed in field 98B, the BOB has been installed. Based on BOB map can be shown as many as 59 boxes and 29 occupancy (49%). Census of BOB are conducted once per 6 month, for e.g. census record in 26 July 2018 div B field 10B, 4 box, and present 4.

Based on field observation, it can be seen that there are no *ganoderm* attacks and caterpillar attacks on BP estate. Visual monitoring has been carried out by the estate on a daily basis.

4.5.2

The estate has routinely conducted IPM training for workers, can be shown the rat baiting training record on February 1, 2019 to 11 employees including the foreman and head gangs. There is evidence of training in spraying technique and safety precaution on 6 February 2019 against 9 spraying staff and my corp sprayer training on 5 Dec 2018 for 41 employees related to chemicals. The workers has been aware regarding to the SOP, it was confirmed during field observation and interview to workers in field 2016C.

Status: Comply

4.6

Pesticides are used in ways that do not endanger health or the environment

4.6.1

In the procedure of ARM policy Section 15 on plant protection mentioned that the use of agrochemical should be based on census analysis evaluation when the level of incidence is more than threshold limits, or recommendation from Agronomist. In order to reduce the chemical usages, the estate has done the controlling of pest by using biological enemies such as BOB and beneficial plant, and also conducting substitution and/or rotate the use of pesticides for the same target.

The company has a SOP Chemical Safety management (SD/SDP/PSQM/(ESH)/202-OH4 dated 26th February 2015). That's procedure is a guideline to define the requirement for the procurement, transportation, receiving, handling, storage, disposal and training on the handling/use of chemical.

4.6.2

Bukit Puteri estate has a monitoring of pesticides usage per hectare and per ton FFB FY2018/2019, it along with active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications. The type of pesticides use for March 2019, namely: kenlon, canyon, cypermethrin, basta, ancom, supersate, and monex, total quantity of a.i / ha: 0.373 and total quantity of a.i / ton FFB: 0.226.

4.6.3, 4.6.4

There is no prophylactic use of pesticides, BP estate has action plan to reduce pesticides usage for FY2018/2019, namely:

1. Reduce of rounds for circle and spot spray (replacing to manual weeding): circle and spot spray carry out based on actual observation, if field still in good condition, spraying should not be done
2. Encourage biological and natural control: to increase BOB ratio, this will be no rat baiting rounds; to increase beneficial plant and to establish full legume covers in all replant and mature area.

The estate has SOP of Integrated Pest Management contained in Section 15 to the Sime Darby Agricultural Reference Manual issued on 1st July 2011. 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 20%.

There is no pesticides listed in WHO Appendix 1A and/or listed in Stockholm or Roterdam Convention as well as paraquat (based on list of pesticides use). All pesticides used by Estates were listed on Provision of Pesticides Act 1994 and USECHH 2000.

The estate are use warfarin (Pesticide Class 1B WHO Appendix III) to control the rat attack. To reduce of warfarin

usage, the estate management has adopting Tyto alba through installation of barn owl box (BOB) for rat population as seen in block of 98B. Estate management mentioned that 1 BOB is expected to covers 10 ha area.

The estates shown the warfarin usage for rat bait, in FY2019, for example in field of 17C Div A, date start 31 Jan 2019, number of baits placed round 1: 17539 (100%); round 2, placed 11000, result : 62.71%, date: 4 Feb 2019; round 3, placed 3500, result: 19.95%, date: 7 Feb 2019.

4.6.5, 4.6.6, 4.6.7, 4.6.10

The estate has routinely conducted IPM training for workers, can be shown the rat baiting training record on February 1, 2019 to 11 employees including the foreman and head gangs. There is evidence of training in spraying technique and safety precaution on 6 February 2019 against 9 spraying staff and my corp sprayer training on 5 Dec 2018 for 41 employees related to chemicals.

Procedure of pesticide storage is presented in document No. JE/SOP/067 which describes store specification and administration of balance recording and in document of pictorial safety standard (PSS) V.1 2008 dated March 17th 2008. Procedure of pesticide handling and application is presented in several documents as follows:

- No. JE/SOP/066 about protective personal equipment (PPE).
- No. JE/SOP/067 about pesticide storage which describes store specification and administration of balance recording.
- HIRAC for pesticide application works.
- MSDS of the respective pesticide.

BP Estate has conducted the chemical health risk assessment (CHRA), the latest are done on August 2015 by Shaari Chin (JKKP HIE), covers all activities involve in chemicals. The assessor conclusion were risk significant but adequately controlled by the estate.

Based on interviews with spraying personnel in the 2016C field as many as 4 people, known that employees have understood spraying SOPs including OSH aspects, workers have used the appropriate PPE based on the results of identification and control plans specified in the HIRAC and MSDS. Based on the interview with the foreman, it was stated that mixing chemicals was carried out in the mixing area. The auditor has verified that the company has provided space PPE keeping and washing facilities for washing after work.

All the ex-containers of pesticide has been managed according to the local regulation and company's SOP. The containers are managed by stored as scheduled waste, disposed in once of 180 days. The detailed can be seen in the C.5.3.

4.6.8, 4.6.9

Based on field observation and information form estate management, it was informed that there were no pesticide application by plane through aerial spraying. There were no associated smallholder under BP Estate.

4.6.11, 4.6.12

Medical health surveillance has been carried out routinely once a year, the latest are hold by clinic Chung on 28 Feb 2019, 7 March 2019, 25 Feb 2019, 22 Feb 2019, 21 Feb 2019 to as much as 56 pesticide workers including store keeper. The test done are including the cholinesterase test and there is no workers showed any sign of ill effects of organophosphates. The recommendation has been made by the doctor regarding to the MCU result namely continuously conduct the existing control (safe work procedure, PPE, training, personal hygiene) and to do annual surveillance. There were two (2) pesticide operator recommended to further investigate, the estate has set the action plan to follow up the recommendation, namely both workers shall to be send for further examination to VMO (Vendor Medical Officer), which planned on May 2019. **OFI**

Based on field observation and interview to chemicals operator, there is no shown any of chemicals exposure indication such as skin irritation and itches, as well as there is no grievance conveyed by the workers.

There is no female worker who assigned as sprayer.	
Status: Comply	
4.7	
An occupational health and safety plan is documented, effectively communicated and implemented.	
4.7.1	
Occupation Safety and Health Policy observed. Policy well communicated through out the organization. Relevant safety operating procedure (SOP) observed with coverage of overall mill and estate operation process. Basic Occupational Health & Safety Management System established for mill and estates. OSH Manual and relevant SOPs developed as documentation of OSH management system. Good design of OSH management system observed. Occupational health and safety plan observed for mill and estates. Progress of health and safety plan monitored and recorded. All planned program performed according to planned schedule. Good implementation of safety & health programme observed which involvement of total staff in the training. Relevant work place inspection performed regularly.	
4.7.2	
Relevant type of test such as audiogram test, medical surveillance, CHRA performed according to legal requirement. HIRADC procedure developed with proper criteria attached for risk assessment at mill & estates. All mill and estates activities covered for HIRADC study. Relevant action proposed for identified hazard. Several operation controls defined with relevant procedures. Overall implementation of operation controls were at satisfactory level.	
4.7.3	
Sufficient and suitable PPE had been distributed to workers. PPE issuance record observed. Relevant PPE training provided to estates staff and workers. PPE usage assessed during the field observation and good practice observed.	
4.7.4	
Safety & Health Committee established for mill and estates. The establishment of Safety & Health Committee observed and in line with legal requirement. Safety & Health meeting conducted at least on quarter yearly basis and comply with legal requirement. Safety and health related issue discussed during the meeting and proper action plan observed for outstanding issue.	
4.7.5	
Emergency Response Procedure observed with description of emergency situation handling for estates. Accident and emergency procedures had been written and briefed to staff, workers, contractors and visitors. Good understanding level observed among the workers.	
4.7.6	
No case accident reported for year 2019 at mill and esatte, Submission of accident summary record (JKKP8) to JKPP observed. Accident recorded in LTA term and clearly presented during the audit.	
4.7.7	
Fire drill training conducted at mill and estates for improving of staff and workers awareness on emergency handling. Functionality of firefighting system assessed during the mill observation. Good condition maintained. Sufficient first aider and first aid box observed along the site observation. Medical insurance provided to all workers. Insurance agreement observed for all workers. Field observation performed and found clinic facility available. Evidence of insurance claim observed.	
Status: Comply	
4.8	

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

4.8.1

There is training for all staff and workers for Bukit Puteri POM, and Bukit Puteri Estate for year 2018/2019 and for external stakeholder (stakeholder consultation meeting on March 2019).

List of training are :

- OSH Act & Regulation 1994
- Environment Quality Act and Regulations 1974
- Factories & Machineries Act 1967
- Environmental, Safety & Health Policy
- Understanding of Group Policy & Authority (GPA B.4)
- Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000
- HIRARC
- Notification of Accidents and Dangerous Occurrence
- Accident Investigation Techniques
- Chemical & Spraying Safe Operating Procedures
- Guidelines (highly Toxic Pesticides) Reg 1996
- Emergency Response Plan
- Scheduled Waste Management – Inventory, labelling, disposal, handling.
- Environmental Responsibility & Biodiversity
- OHSAS 18001
- RSPO training
- First Aid Training
- Foreign workers Induction programmed

Relevant training programs planned and cover the health and environmental risks of pesticide exposure, recognition of acute and long-term exposure symptoms including the most vulnerable groups (e.g. young workers, pregnant women), Ways to minimize exposure to workers and their families, productivity and best management practice. Pregnant women : policy / memo → to all women workers inside Bukit Puteri Estate → prohibition of fertilizing and pesticide usage for pregnant women and breastfeeding

4.8.2

Relevant training records such as training attendance list, training evaluation record, training certificate, etc available during the audit for mill and estates. Sighted 64 list of works that has been working inside the mill and each of workers has been given a sign for the training. Sighted the record of training and the matrix training requirement for OUS including manager ,senior assistant, assistant ,Field conductor , store clerk mandora , workshop attendant, machine operator , skill workers , harvester , sprayer , General worker , foreign worker s, ESH Coordinator AP, which include;

- i) Osh Act
- ii) ESH
- iii) EQA 1974
- iv) HIRARC Training
- v) Group ESH policies

Training Frequency is conducted from monthly to annually basis as per continuous improvement plan of the mill and estate. Sighted the list name of workers that had been made into list Employee no, date of joined , name of workers , identification card No local workers), ID designation, department, SOP training, PPE training , Hearing Conservation aid training , fire drill, COBC, Chemical handling , scheduled waste , Lock out Tag out , OSH committee, Hiradc and first aid training for the workers throughout the years.

Status: Comply

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

The company had developed an Environmental Aspect and Impact identification (EAI), FY 17/18 for the operation of Mill and Estate and its impact to the environment (document No. EAI / 2017 /001-1). Mill does not involve in new planting neither replanting therefore Environmental Impact Assessment (EIA) report for Malaysian context is not related, however SIA and EAI are available and updated accordingly. EAI evaluation is complete covering the whole estate activities. Sighted the impact evaluation form for Sime Darby Plantation Sdn Bhd for Bukit Puteri Estate and Master List EMS /01/5.4.3 related to Environment Aspect and Impact Identification, review on 11th October 2019 and verified by Mill manager and for the estate the EAI had been reviewed on 16th January 2019 and prepared by the Assistant Manager. The aspect of environment had been recorded into the activities EAI / 2016/08-01 which comprising the estate activities such as Workshop – Discharge to land: solid consumption/spillage/grinding/tyre servicing/power consumption/electricity; FFB transportation; FFB Stacking; FFB Loading Loose Fruits loading; Harvesting FFB; Harvesting collection; Field FFB Chute; Road maintenance – release to air and exhaust gas contribute to air pollution; Fixing bridges and culverts – used raw materials, timber and cement iron; Drains and pits constructions – noise from machine operation sound; and Code of environmental Impact

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 at Bukit Puteri Estate, mitigation against negative impacts identified in EAI report was done through Environmental Management Plan (EMP). The EMP made in place for year 2018/2019 related to environmental Issues, mitigating measures, action by person in charge and time frame of the action. Sighted the appointed person that will be in charged to mitigate the environmental impact, as for example schedule waste management [mill CEPSWAM – mill manager] - to ensure the Scheduled Waste disposed of before 180 days or 20 ton weight whichever come first as per Environmental Quality Act requirement. Impact registered was evaluated, suitable mitigation of impact measures implemented with time frame included. **However during the field observation at the workshop ara, sighted the grease waste found at the fence and the lubricant spillage found nearby the water tap area. It was observed also the tractors that parked outside the servicing area had been parked without any containment.** Based on the field observation, it was concluded the Bukit Puteri estate does not cover the implication of potential impact from the current practices in the workshop in order to mitigate negative effects being occurred. **NCR No.: 2019.01**

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, had establish the Pollution Preventive Management Plan prepared for year 2018/2019 which included action plan, person in-charge and implementation status. Monitoring protocol was undertaking by physical inspection and parameters measurement to ensure conformity. The monitoring protocol also has been developed by management unit including the evaluation of matrix criteria, weightage and operating condition (Normal, Abnormal and Emergency). Sighted the environmental management in place which include several plan as below :

- To ensure send water sampling quarterly as per appendix 7
- To ensure SW Disposed of before 180 days or 20 tonne whichever come first as per EQA Scheduled waste requirement
- Sighted also the action steps : identify / Appoint PIC, Training on scheduled waste, record inventory of SW, Disposal of SW
- Water contingency plan FY 2018 and 2019 : include incidents, action steps , resource required , person responsible, date of commencement, completion status

Minor 5.1.2 Status: NCR No.: 2019.01

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

Indicator 5.2.1

PSQM Department had prepared High Conservation Value (HCV) Re-assessment for Pahang Zone dated March 2016 covering SOU 11. The HCV re-assessment has been conducted against the HCVF Toolkit for Malaysia with local expert on internal Sime Darby team. The HCV assessment has involved public consultation with stakeholders (local community, Government Agency and Management Representative at SOU 11) dated on 29th February 2016. The report describes a total of 157.64 ha of HCV area identified in SOU 11 which comprises HCV 4 and HCV 6 areas as follows:

Estate	Assessment Area	Ha	Present HCV
Bukit Puteri Estate	Water catchment	2.81	HCV 4
	River reserve sg Telang	17.77	
	Pond	0.78	
Total HCV area		21.36	

The report also includes a list of common wildlife identified in the area SOU 11 including their IUCN and WCA 2010 conservation status. There are seven bird species status least concern under IUCN and Total Protected Wildlife under WCA 2010, for example: *Halcyon smyrnensis*, *Acridotheres tristis*, *Spilornis cheela*, *Gallus gallus*, etc. There are five mammals species status least concern under IUCN and Total Protected Wildlife under WCA 2010, for example: *Sus scrofa*, *Macaca fascicularis*, *Prionailurus bengalensis*, etc. There are two Reptiles species status least concern under IUCN and Total Protected Wildlife under WCA 2010, as follow: *Naja naja* and *Varranus salvator*.

Indicator 5.2.2

The company has conducted monitoring HCV & Conservation areas in accordance with the program plan for 2018, including observations at HCV areas for signs of encroachment, wildlife issues, pollution or erosion and other. Based on result of latest monitoring January 2019, it is known that there is no spraying identified, there is no encroachment, there is no hunting, there is no wildlife issues, there is no pollution / erosion issues on the HCV areas.

Sighted the action plan on the HCV report for Bukit Puteri estate for year 2019 which include :

Identified HCV	Action taken	Person in charge	Monitoring record
Buffer zone	<ul style="list-style-type: none"> To educate sprayers not to spray at buffer zone Frequent check of buffer zone including signages, no swimming, no hunting 	Senior assistant	Available
Boundary reserve forest	Ensure no encroachment and no trenching Sustainability of warning sign	Koperal siva	Available
Worship area	Monitor cleanliness of worship area by follow the rubbish collection schedule and grass cut schedule	Safuan	Available
Tree Forest Planting	To ensure and maintain all the record of tree forest planting	Amirul faiz	Available

It was confirmed through interview with sprayers form Bukit Puteri Estate that no spraying is caried out at these palms. Based on the HCV report Conducted, the area that has been categorized as HCV as part of the assessment team had been taken care and monitored the progress to ensure the sustainability of the area.

Indicator 5.2.3

HCV assessment has involved public consultation with stakeholders (local community, government agency and management representative) on January 2019 .Sighted the monitoring HCV at Bukit Puteri Estate on March 2019 comprising :

- i) Area
- ii) Field no, GPS Coordinate
- iii) Observation → encroachment / sign of trespassing → wildlife issue / conflicts sighting → sign of water pollution / soil erosion → sign of spraying chemical 5 m from reservoir (No evidences sighted)
- iv) Remark maintenance, signage, fence
- v) Reviewed by (name and designation , date)

e.g: area: river reserve → coordinate Field P 09 A → No encroachment → no wildlife issues → no sign of water pollution → no sign of spraying. The Company also has conducted socialization related to prohibiting of chemical application on the HCV area dated 11th March 2019 in Bukit Puteri Estate. It was confirmed through interview with sprayers from Bukit Puteri Estate, that they have understood prohibiting of chemical application on the HCV areas, for example river buffer zone on HCV areas and signboard that has been displayed.

Indicator 5.2.4

The company has conducted monitoring HCV & Conservation areas in accordance with the program plan 2018/2019 (see 5.2.2). The monitoring results provide recommendations for improvements to the next program.

Indicator 5.2.5

Based on HCV documents review and interviews with local community as well as field observation, there was no identified HCV area overlapping with local community rights as the HCV is for the water consumption in the estate,

Status: Comply

5.3

Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.

Indicator 5.3.1

Sime Darby Plantation SOU Bukit Puteri had made inventory of waste registry for FY 2019 that has been recorded in DOE record online system of ESWIS. Based on the document, the information about product and source waste / pollution are available such. Sighted the inventory of the waste from the estate being uploaded into eswis system dated 26 april 2019 :

- i) SW 102 – Spent battery 0.15
- ii) SW 305 – Spent Lubricant 0.2 T = total 2 tonnes
- iii) SW 404 –clinical waste – 0.00
- iv) SW 409 – Spent engine oil and hydraulic Oil – 0
- v) SW 409 – Spent pesticide container – total 0.4 Tonne, Generated = 0.2 Tonne
- vi) SW 410 – filter , spent gloves and rags = 0.00

Sources of waste such as: workshop, chemical mixing area, schedule waste store, office, store, septic tank, scrap yard, compost plant, clinics as per details on January 2019

Type pollution	Source pollution	Status
Air	Vehicle exhaust Machinery exhaust Rod condition Pesticide spraying	January 19
Noise	Machinery Vehicles	On going

Water	Pesticide disposal Water retaining rubbish/refuse	January 19
Odour	Garbage disposal	January 19
Replanting	Land erosion	January 19

Indicator 5.3.2

The company has Scheduled Wastes (Hazardous Waste) Management procedure with document ID: SD/ SDP/ PSQM (EHS)/ 203-EN1 dated on 26/02/2015. The procedure explains that the Scheduled Wastes are stored at Hazardous Waste Storage, then disposal through DOE registered contractor. Containers of scheduled waste shall be clearly labeled in accordance with regulation, Scheduled Wastes generated shall only be in storage for not more than 180 days and the quantity of scheduled waste accumulated on site shall not exceed 20 MT, may apply to State DOE in writing to store above 180 days or more that 20 MT if necessary.

Disposal record maintained as per consignment note no : 20190312131R4826. Based on the record date submission on :

- 1) SW 305 – 1.2 MT send to Kualiti Alam Sdn Bhd – registered collector Cenviro Sdn Bhd
- 2) SW 410 – Rags plastic , paper , filter = 0.01 MT Send to Kualiti Alam Sdn Bhd – registered collector
- 3) SW 409 – disposed containers : bags , equipment , contaminated with chemical , pesticides, mineral oil or SW = amount 0.3 MT

Based on interview with management representative, it is known that the Scheduled Wastes are stored at Hazardous Waste Store, and then submitted to registered contractor (*Kualiti Alam Sdn. Bhd*).

Sighted the list of consignment note for disposal of the scheduled waste through Kualiti Alam sdn Bhd (Cenviro Services) .Sighted the consignment note dated 20/2/2019 that collect the waste through Cenviro services and being transported to Kualiti Alam.

Indicator 5.3.3

The waste management and disposal plan had been made to avoid reduce pollution as per details Pollution preventive management plan (2018/2019) :

- i) Collect and record all listed scheduled waste
- ii) Scheduled waste were stored in the scheduled waste store
- iii) Label with proper labelling
- iv) Monitor scheduled waste inventory
- v) Disposed f item through reg contractor by DOE (180days / 20MT) whichever come first

Based on field observation to Scheduled Wastes Store in Bukit Puteri Mill and estate the Schedule Waste is managed by collect and record all listed schedule waste, Schedule Waste were stored in the Schedule Waste Store, label with proper labelling, monitor of Schedule Waste inventory, and dispose off the item through registered contractor by DOE (180 days / 20 Mt whichever come first).Based on field observation to Housing Complex, verified that the domestic waste (rubbish) waste to be disposed of at the field more than 3km from the estate complexes.

Status: Comply

5.4

Efficiency of fossil fuel use and the use of renewable energy is optimised.

Indicator 5.4.1

The company has monitored the use of renewable energy came from fiber and shell. Kerdau Mill has record of energy used from fossil fuel and renewable energy. Renewable energy used came from shell and fiber. Records are available from period of January – March 2019, i.e:

Shell and Fibre Usage per ton FFB has been monitored, as per details:

Month	January 2019	February 2019	March 2019
Shell Used (MT)	508.73	504.32	566.48
FFB Processed	6359.08	6304.04	7080.99
Shell /FFB	0.08	0.08	0.08
CPO Production	1167.56	952.26	1167.56

Diesel Usage for Month January – march 19

Month	January 2019	February 2019	March 2019
Diesel Used (L)	600	600	1000
FFB Processed	6359.08	6304.04	7080.99
Diesel/FFB	0.09	0.10	0.14
CPO Production	1276.05	1261.86	1425.34

Electricity Usage for Month January – March 19

Month	January 2019	February 2019	March 2019
Electric kW	34,092	34092	27975
FFB Processed	6359.08	6304.04	7080.99
Electric/FFB	5.36	5.41	3.95
CPO Production	1276.05	1261.86	1425.34

Based on the field observation and documentation at the estate, the unit had continuously monitored the diesel usage, mill electricity usage, and also the utilization of the fibre and shell used in the estate.

Status: Comply

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.

5.5.1 & 5.5.2.

There is a SOP in Standard Operating Procedure, Section B2, Felling / Clearing & 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. Based on the field verification, the company had replanting the estate using the chipping and felling method and non fire replanting usage method.

Status: Comply

5.6

Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.

5.6.1

Sime Darby Plantations Bukit Puteri mill had an analysis of aspect impact assessment from the activity and record the mitigation plan from the impact for the mill :

- Dust emission from 0.4g/Nm³
- Steam usage
- Diesel usage for the vehicles
- Black smoke emission when starting the engine
- POME effluent being utilized as compost
- Engine operational – smoke emission
- Diesel spillage at diesel tanks
- Noise pollution at kernel
- Vehicle smoke entering the weighbridge

- Lubricant oil at Store
- Smoke from prime mover

5.6.2

Sighted a document of plan to reduce the 'Green House Gas' for year 2017/2018 for Bukit Puteri Mill and Bukit Puteri Estate. There is a document listed down the activities in the Bukit Puteri estate that contribute to green house gas e.g: diesel usage, pesticide usage, chemical fertilizer usage, domestic waste usage, organic waste domestic usage. There is also action plan been documented to reduce the pollution and activity that contribute to GHG emission as per flow chart:

- Estate activity that release GHG → Action plan to reduce the emission → program to reduce GHG Emission → person in charge → Status of the action plan

5.6.3

GHG monitoring include the record of tonnage fertilizers, and diesel usage in the estate and mill. The reporting GHG has been made through PALM GHG toolkit as per evidence sighted. Sighted the evidence of the Palm GHG calculation has been made as per details :

Summary of Net GHG Emissions :

Emissions per product	tCO ₂ e/tProduct	Extraction	%	Production	ton/year
CPO	1.17	OER	19.99	FFB Processed	55,118.11
PK	1.17	KER	4.48	CPO Produced	11,018.14

Land Use	ha
OP planted area	9592.9
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0

Summary of Field Emissions and Sinks

	Own Crop		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha
Emissions								
Land conversion	36511.57	9.7	810.96	9.65	-	-	21773.12	19.76
CO ₂ emissions from fertilizer	2489.66	0.66	72.34	1.03	-	-	1358.64	1.5
N ₂ O emissions	1982.11	0.53	41.63	0.68	-	-	1664.93	1.26
Fuel consumption	373.15	0.1	9.5	0.08	-	-	-326.62	-0.04
Peat Oxidation	0	0	0	0	-	-	0	0
Sinks							0	0
Crop sequestration	-34608.122	-9.19	-737.17	-9.36	-	-	-20606.5	-18.45
Conservation Sequestration	0	0			-	-	0	0
Total	6748.37	1.79	197.26	2.07		-	3863.56	4.02

Summary of Mill Emissions and Credits

	tCO ₂ e	tCO ₂ e/tFFB
Emissions		

POME	8257	0.15
Fuel consumption	17.1	0
Grid Electricity Utilisation	379.08	0.01
Credits	0	0
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	8653.18	0.16

Palm oil Mill Effluent (POME) Treatment

Divert to compost	0 %
Divert to anaerobic digestion	100 %

POME Diverted to Anaerobic Digestion:

Divert to anaerobic pond	100.0 %
Divert to methane capture (flaring)	0.00 %
Divert to methane capture (electricity generation)	0.00 %

Based on the report made, the Palm GHG Calculator used are version 3.0.1. Based on the toolkit and data from Sime Darby SOU Bukit Puteri, correct data had been input and Exclude LUC Emission is not applied.

Sighted the total N2O Emission from EFB TCO2e = 258.7. The data input have been verified using the Palm GHG Calculator Version 3.0.1. The calculation option based on the palm GHG report are emissions, summary emissions, Mill emission and credits, Plantation/field emission and sinks, Field emission and sinks, emission form palm kernel crusher and emission source/sinks.

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
 Since the mill is located within Bukit Puteri Estate, therefore the initial SIA was done as whole SOU 10 dated on 7-18/09/2015. The next Social Impact Assessment [SIA] plan to be conduct by 2020. The mill has not made any changes in the layout, purchase of new machineries. As per the interview by audit team with external stakeholders, mill workers and office staff, there is no social issues happens since from previous assessment. In estate, the recent stakeholder meeting was on 14/02/19. There is no evidence of extension of existing land area or any other new development / construction within the estate compound. Since the SIA is plan to be conduct by 2020, the management unit relies on the annual stakeholder meeting to collect informations

6.1.2
 The mill and estate management continue on the annual external stakeholder meeting [recent meeting dated on 14/02/19] to review and discuss on various environment, social and OHS issues. There are no affected parties due to the development of this estate and mill operation. During the initial assessment in 2015, the surrounding communities, housing estates, villages and internal stakeholders were consulted. The participants of external stakeholder for the meeting increased from 24 in 2018 to 31 in 2019.

6.1.3
 In the mill, as for Financial year 2018/19, a management plan was established based on the inputs from external

stakeholder, OHS meeting and Gender committee meeting. There are 4 action plans, status, PIC and expected completion status and remarks sighted in the plan titled “Management Plan on Social Impact Assessment 201”. As at 24/04/19, there is 1 on-going plan with monitoring by mill management 2 scheduled to be closed in June’19 and 1 with status as “Upon Request”. Based on the stakeholder meeting minutes in estate that dated on 27/02/2019, the Estate Senior Asst Muhd Faiz Tajudin has outline a SIA plan to mitigate, implement and monitor of the discussed issues. There are 5 plans available with timetables that consist of PIC and timeline.

6.1.4

Sighted an appointment letter for Asst. Manager who is responsible for the update of SIA management plan. The stakeholder meeting dated on 14/02/19 and the management plan was not required for updates as there is no negative inputs from stakeholders. The estate has a SIA management plan is being review annually by the estate manager with involvement from GSQM and estate staff. The outcome of the discussion being conveyed to affected parties timely, example of the EFB drops along estate roads where all the drivers were briefed and informed.

6.1.5

There is no smallholder 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.

Indicator 6.2.1

The Certificate Holder has the list of stakeholders in every management unit in Bukit Puteri Mill and Bukit Puteri Estate. The stakeholder was categorized as Contractors, Vendor/Suppliers, and Local Community Head, Other Interest Parties (Government Agencies, Schools, and Hospital). These document was update as per year of 2019. All of the management unit of the estate has a Procedure For External Communication (Issued on 01/11/2008) The company maintains and documented a list of stakeholders in “List of Stakeholders”.

- i) 22 suppliers
- ii) 4 local community heads : MPKK – RTP Sg Ular , kampung Lubuk Kulit , Kampung keledak, Kampung Beletik
- iii) 27 Interested parties – governman Sectors (SK LKTP Sungai Koyan , SMK Sungai Koyan, Balai Polis Padang Tengku , Hospital Kuala Lipis, Telekom Malaysia, MPOB, Tanah Makmur Estate
- iv) 17 Contractors

All the SOPs related to sustainability are written in plain English and interpreted to their mother tongue.

Indicator 6.2.2

The company in each management unit was appointed the responsible person. Mr. Muhd Syahmi [for estate] and Mr. Rizqan Ammar Bin Shamsuddin [for mill] appointed as the responsible for communication and consultation with the local communities and other interested parties. The appointment letter also clearly indicates the roles and responsibility of the person. The appointment has been communicated internally by memo and externally through stakeholder consultation during muster morning and meeting. The responsible person and the job description was explained in Estate Manager Decision Letter for the responsible person for communication and consultation with the local communities and other interested parties. The role has clearly shown the appointed person responsibility and task description if there any issues raised in the management unit. Sighted the job description :

- i) Investigate any report or matter arising on social issues
- ii) Keeping the record and complain from the complainer and recording the statement
- iii) Giving the advice and counseling to the related party on social matters
- iv) Assisting the estate management to hold any program related to social issues.

The procedure has been communicated internally by method of muster morning briefing and training/socialization to the

workers and the contractors.

Indicator 6.2.3

The list of stakeholder has been maintained by the each management unit of estate and POM. The stakeholder was categorized as Contractors, Vendor/Suppliers, and Local Community Head, Other Interest Parties (Government Agencies, Schools, and Hospital). The company has explain the mechanism of way to communicate with related stakeholder in several event, for instance in meeting with contractor. The auditor interview local contractor for FFB supplied [Hasnizam Trading] to Bukit Puteri POM, Local People in Kampung Keledak, and teacher of SK Sg Koyan. Based on those interview process that knew the stakeholder was understand the way to access information from the management unit.

Based on the stakeholder meeting minutes on 27/02/2019, the Estate Senior Asst (Azlee) has outline a SIA plan to mitigate, implement and monitor of the discussed issues. There are 5 plans available with timetables that consist of PIC and timeline. However, sighted during stakeholder meeting on 14/02/19, Dr. Hasnizadila (Doctor from Clinic Zara), has requested the estate management to monitor the hygiene and cleanliness factor of foreign workers as she mentioned workers seeking treatment from the clinic seen not practicing good hygiene and cleanliness. There is no evidence that this issue was consulted with foreign workers and been addressed in an action plan. NCR No.: 2019.02

Minor 6.2.3	Status: NCR No.: 2019.02
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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

Since the mill is located in estate's land, the estate also provides a log book at the security post to enable external stakeholders to register their complaints and grievances. There is also a "Whistleblowing Policy" (GPA No. B5) dated 27/02/14 are made available for handling stakeholder's social issues. The mill office staff are closely monitoring and check regularly of the complaint box attached to the office wall and the grievances logbook for any input from internal and external stakeholders. In the estate, there are annual training records on Sustainability Policies and interview with estate workers, found they are not restricted from making any complaint or grievances. There was no any grievances recorded since from ASA 1.2. Sighted the logbook for electrical items faulty, doors & windows refurbishing and etc. that complaint by workers and action taken details by the estate management.

6.3.2

Dispute was not evidenced in the internal and external stakeholder meeting minutes. The Asst. Managers of mill and estate are responsible for the communication with assistance from office staff. Interview with mill & estate workers and external stakeholders, they are aware on the process of communication and method of reporting.

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, 6.4.2, 6.4.3

As at to this audit there is no evidence of loss of legal, customary or user rights within this operating unit. Negotiated agreements and compensation claims are not applicable.

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

The mill as only local works (100% Malaysian) and there are no contract workers employed by either mill or estate. Sighted the contract agreement of foreign workers at estate and local workers in mill. Both Contract Agreements

stressing on pay, fringe benefits, salary slips, medical surveillance etc. As per check roll workers, the contract workers are also given monthly pay slip by their employers and this was cross verified in loading ramp, interview FFB lorry driver from CK Teik Ent. and found he receives pay overtime and payslip accordingly. Sampled Mar'19 pays lips for workers as below. The annual day deduction on monthly basis will be refund to workers in end year salary. Sampled pays lip of workers was requested to demonstrate calculation method by Office Clerk and Mill Asst Manager along with auditor, found no discrepancy.

In estate, based on manpower list, there are 364 workers and records available to demonstrate they are above 18years old at the time of employment. For local staff and workers, the probation or appointment letter serves as commitment between both parties. As for foreign workers, employment arrangements are based on contractual agreement. Sampled the "Letter of Employment" which has no violation and well documented into individual file that consist of a copy of passport, permit, passport surrender letter and etc.

6.5.2

The mill has total 69 workers, all Malaysians. Sampled letter of offer for 5 workers that terms and conditions have been clearly specified. Workers interviewed are aware on the term and conditions and retaining a copy of the letter with them. The estate is complying with minimum Wage Order Amendment 2018 [RM 1100.00] effective from 01/01/2019. There is no discrepancy found the payment calculation that includes of OT rates. The workers interviewed in the field able to explain (with little language mixture of English & Malay) the payment received date, deduction and basic salary.

6.5.3

The worker's line-site are in "Sharing Concept" for workers from mill and estate. Site visit to the worker's quarters seen with proper signage's on ban on fire use, emergency assembly area and etc. Interview with workers [Nepalese who works as housekeeper), revealed the management ensure workers have adequate beds, kitchen and toilet facility. He too mentioned the management provides decent living quarters with proper drainage system, weekly domestic waste collection, attend to household repairs and free water supply for domestic consumption. Sighted the weekly line site visiting report by the Medical Assistant that verification on cleanliness, domestic waste, landscaping, drainage system, housing compound, road safety, building maintenance, water supply, lavatory & sewerage system, electricity supply, crèche, medical facility, community hall and communicable disease control.

6.5.4

The foreign workers are able to access via company's transport for food, groceries and vegetables that purchased on weekly basis. Interview with workers, of foreign workers found the estate management has no restriction on their interest of getting their basic needs out of estate compound. Since mill workers are 100% local, therefore they have more options in getting their groceries and other household items. There are many small stalls where workers can purchase meals for affordable price.

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.

6.6.1 and 6.6.2

Sighted mill's minutes of Union Meeting with the workers dated 16/11/18 in meeting room, attended by the 2 Field Officers from NUPW, 8 mill workers [mill has no foreign workers] and 5 absent with reasons. Issues discussed were appointment of new committee members, what are the insurance coverage and the new Wages Order. There were no any objections raised during the meeting. Interview the workers at loading ramp, boiler room, engine room and sterilizer station that they are aware on the committee and any issues that discussed in the meeting. In estate, interviewed 4 manurers at field 16B whom the Union members are revealed the estate management being supportive in all aspects. The foreign workers are aware on the policy that company shall respect the rights of all personnel to form and join trade unions of their choice and to bargain collectively. The nomination of Union members being done fairly and participation from local and foreign workers are reasonable.

Status: Comply	
6.7 Children are not employed or exploited.	
6.7.1 Based on mill's workers list, no one has found below than 18 years old and this was cross verified with workers interviewed at loading ram, boiler room, engine room, depericarper area and office, no findings of young workers. Based on the estate's manpower list, there are 364 workers and records available to demonstrate they are above 18years old at the time of employment. The latest list has local staff & workers – 70, Indonesian – 140, India – 86, Bangladesh – 17 and Nepal – 51.	
Status: Comply	
6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	
6.8.1, 6.8.2 Interviewed with mill workers, found no evidence of any form of workplace discrimination. Based on the workers master-list, there are almost 60% workers working more than 8 years and interviewed resulted with positive response against mill management. Verified the complaint and grievance book against the interviewed workers, revealed no issues relating to discrimination. The sampled interviewed estate's local and foreigner workers found no form of discrimination. During religious activities for Hindu and Muslims, the foreign workers are allowed to practice their religious activities as estate management has provided facilities and infrastructure adequately. Interviewed estate workers during field visit, the office staff and the external stakeholders, has no history of discrimination and the workers are aware on the availability of social policy. Recruitment process, assigning to work site and providing basic needs has no traces of discriminations.	
6.8.3 In the POM, verified the complaint and grievance book against the interviewed workers, revealed no issues relating to discrimination. Increments of wages and promotion is based on competency and performance which is also understood by all level workers. Sighted a promotion letter for a senior Clerk from Bukit Puteri Estae has been promoted to Chief Clerk (Grade 2) and transferred to Bukit Puteri POM under the probation period as per MAPA/AMESU agreement with effect from 01/04/19. In the estate, foreign workers are encouraged in a way promoting them to foreman level if they are qualified on understand and speak Bahasa, good work attitude, some leadership quality and job knowledge. As for local workers, there are evidence for promotion for office and field staff.	
Status: Comply	
6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.	
6.9.1 In the POM, sighted the Gender Committee Minutes dated on 19/04/19, committee members [8 workers]. Based on the minutes of meeting, there was no negative issues such as domestic violence or sexual harassment received from the workers. The newly elected gender committee chart seen display at notice boards. Interview with Chairwoman for gender committee, found the mill management always supportive in the motive and programs. The estate has a copy of manual titled "Manual on Implementation of the Gender Policy" and flow chart available at page 22 that describes the flow of complaint and how the company will respond to the complaint. The appointed committee [committee chart available, adviser the estate manager] found satisfactory progress and functioning in maintaining harmonies work and living environment. The recent meeting minutes sighted, 08/02/19 attended by 26 members and 6 with absent excused.	
6.9.2 During mill visit, interview female workers at loading ramp who understand the content of policy. The is no changes in the existing policy [as stipulated in Social Policy] and interview with female office staff as well the gender committee	

chairman revealed, the female workers understood their reproductive rights. In estate, seen training records for Sustainability Policies briefed to all workers. Interview with Gender Committees and field workers found they are aware on the policy and their reproductive rights. There are no female workers employed for spraying and manuring.

6.9.3.

According to the gender committee member from POM [office staff] the female employees are understood the flow of making an official complaint besides of verbal approach. As at 24/04/19, no records sighted in the grievances logbook as well in the minutes of meeting dated on 19/04/19. In the estate, seen no records found on any form of harassment towards workers. The interviewed workers are aware on the flows of lodging a social issue: Issue to forward to state PIC → Estate PIC to investigate the issue → consulting affected parties → solving mechanism → evaluation by state manager. Interview a committee member who works in the estate for 9 years.

Status: Comply

6.10

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

6.10.1 and 6.10.2

The FFB price based on standard from Malaysia Palm Oil Board (MPOB). There was showed FFB price list update till March 2018 with price for period of March is RM 25.74/MT The FFB price was put in the front window of the weight bridge room. The Bukit Puteri POM received outside FFB from outside crop plantation consist of 13 FFB suppliers. There was no smallholders scheme under SU O10, only FFB trader (supplier) and based on stakeholder consultation with one of supplier that the management of POM has help them to how to control the quality of FFB and mechanism of safety loading of FFB (using the net on truck and the truck operator should using properly PPE).

Indicator 6.10.3

There was observed of document contract between Bukit Puteri POM and Yee Plantation Sdn Bhd for FFB supply and also document contract between Bukit Puteri Estate with Mahu Berjaya Enterprise (Local Contractor). The right and obligation each party and the payment mechanism was clearly describe in this document, consist of the contractor employed use safety equipment (PPE Used) and/or any other form of protection to ensure the safety and health, compensation insurance payment mechanism and etc. Based on document verification, interview with company representation and the local contractor at stakeholder consultation process, they was understand of contract before signed. Overall the document was filled in Head Office and copy of document in mill and estate office, and the related evidence of payment slip was filled too by the contractors or dealers.

Indicator 6.10.4

The payment was transferred via bank account by the Head Office, the Management estate only acquired the received from the Head Office when the payment process has been done. There was observed payment record to contractor 12 /11/ 201 to Lipis motor regarding the Hose R2a112 payment amount RM 130.00. Sighted the purchase order number 4502253060 – net payment 30 days approved and signed by the Mill manager Mr Aeran Bin Ahmad

Status: Comply

6.11

Growers and millers contribute to local sustainable development wherever appropriate.

6.11.1, 6.11.2

The CSR program of BP Estate and POM are contained in the Social Impact Assessment management plan FY2019, it was prepared based on communication and consultation with communities around. In addition, the SOU10 shows the document of assistance proposal submitted by the communities which has been responded by the unit management.

There were no scheme smallholder under SOU10-Bukit Puteri.

Status: Comply

6.12

No forms of forced or trafficked labour are used.

6.12.1

Based on SEMUA – Employee Master Listing System at POM, as at 24/04/19 there are 69 workers in the mill who

majority working in this mill over 5 years [100% Malaysian]. The mill management provides a probation period letter for 3 months and upon confirmation, he/she to receive the confirmation letter. Sampled letter for Sore Assistant recruited on 06/09/17 and the confirmation letter dated on 01/05/18 which is almost 9 months of probation due to his 1st job after secondary school education. Based on the interview with estate's internal & external stakeholders evidenced of no force labor in which for the process of recruiting foreign workers are done fairly at the origin country and potential workers are well aware on their job nature and employment terms prior to accepting their offer. The estate management maintaining the "Passport Save Keeping" acknowledgment letter that mutually agreed and signed by both parties and sampled 6 letters of harvesting workers with no negative findings.

6.12.2

Based on the interview session with estate and mill workers, staff and managers, the contract substitution is not applicable as workers signed their contract mutually and agreed to terms specified in contract.

6.12.3

The mill has no foreign workers. There is no specific policy available for temporary or foreign/migrant workers, however the "Social Policy" consisted the statement of the non-discriminatory practices. The workers interviewed at field, office and at line-sites has no negative feedbacks on the housing facilities, payment date, job distribution and the manner of their local superior's interact with foreign workers.

Status: Comply

6.13

Growers and millers respect human rights

6.13.1

The mill has no foreign workers, however the Group Policy regards to "Social Policy" dated on Jan 2015 seen displayed at office and memo board. Interview with estate workers resulted with positive feedbacks that labor policies well understood by them. Sighed the Social Policy adequately display at office and in the notice board that accessible by all workers. Verified the training records for 2018, where the foreign workers have been briefed on Social Policy on various dates.

6.13.2

The mill and estate have no foreign labor with the dependents lives with them. There are Government aided Schools within estate premises and external stakeholder interviews reveled the students are from the surrounding villages and some from the local estate worker's children.

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.

SOU-10 Bukit Puteri has established since 1989, starts as rubber plantation and then converted into oil palm plantation, which currently it has turn on the second cycle. Based on information from unit management and external stakeholders, it was known that there is no new land expansion (development) in SOU-10. Hence, this requirement is not applicable.

Status: Comply

7.2

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.

SOU-10 Bukit Puteri has established since 1989, starts as rubber plantation and then converted into oil palm plantation, which currently it has turn on the second cycle. Based on information from unit management and external stakeholders, it was known that there is no new land expansion (development) in SOU-10. Hence, this requirement is not applicable.

Status: Comply

7.3

New plantings since November 2005, have not replaced primary forest or any area required to maintain or

enhance one or more High Conservation Values.	
7.3.1, 7.3.2, 7.3.3, 7.3.4, 7.3.5 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.	
	Status: Comply
7.4 Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.	
7.4.1 and 7.4.2 SOU-10 Bukit Puteri has established since 1989, starts as rubber plantation and then converted into oil palm plantation, which currently it has turn on the second cycle. Based on information from unit management and external stakeholders, it was known that there is no new land expansion (development) in SOU-10. Hence, this requirement is not applicable.	
	Status: Comply
7.5 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.	
7.5.1 No new planting done. Replanting was done on Sime Darby Plantation own land.	
	Status: Comply
7.6 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.	
7.6.1, 7.6.2, 7.6.3, 7.6.4, 7.6.5, 7.6.6 Based on the area statement, the estate has no new planting. Therefore, legal, customary and user rights not applicable.	
	Status: Comply
7.7 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.	
7.7.1. 7.7.2 No new planting sighted after January 2010 as the plantation estate was established on 1989	
	Status: Comply
7.8 New plantation developments are designed to minimise net greenhouse gas emissions.	
7.8.1, 7.8.2 No new planting sighted after January 2010 as the plantation estate was established on 1989	
	Status: Comply
PRINCIPLE #8 Commitment to continuous improvement in key areas of activity	
8.1 Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.	
To reduce the pesticide usages, Bukti Puteri estate has continuously implemented the installation and monitored the BOB as biological management of rat attack and conduct the planting of beneficial plant to prevent the caterpillar manifestation. The estate has continuously applied the EFB as a recycle nutrient.	
	Status: Comply

3.2. Summary of Assessment Report of Supply Chain Requirement

3.2.1 General chain of custody requirements for the supply chain

Clause	Requirement																
5.1	Applicability of the general chain of custody requirements for the supply chain																
5.1.1	<p>The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.</p> <p>The SOU10 Bukit Puteri POM are takes the legal ownership of its product (CPO and PK) and all physically handling of its product as well. Product transportation are given to third party which is bonded by the agreement, however during the product transport the legal ownership are under Bukit Puteri POM. Detail of transporter agreement explained in the clause of 5.5.</p>																
	Status: Comply																
5.1.2	<p>Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.</p> <p>Bukit Puteri POM is a palm oil mill which only sale its product, did not buying the product from the other RSPO licensed traders.</p>																
	Status: Comply																
5.1.3	<p>Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.</p> <p>The SOU10 Bukit Puteri POM are RSPO member registered under Sime Darby Plantation, Bhd with no.: 1-0008-04-000-00 (September 8, 2004). Also has been registered in RSPO Palm-trace, detailed in table below:</p> <table border="1" data-bbox="151 1370 1066 1704"> <tbody> <tr> <td>Member Name</td> <td>Bukit Puteri Oil Mill</td> </tr> <tr> <td>Member ID</td> <td>RSPO_PO1000000192</td> </tr> <tr> <td>License ID</td> <td>CB67783</td> </tr> <tr> <td>Issued By</td> <td>PT Mutuagung Lestari</td> </tr> <tr> <td>Issued On</td> <td>22-05-2018</td> </tr> <tr> <td>Start Date</td> <td>7/7/2018</td> </tr> <tr> <td>End Date</td> <td>6/7/2019</td> </tr> <tr> <td>License Status</td> <td>Active</td> </tr> </tbody> </table>	Member Name	Bukit Puteri Oil Mill	Member ID	RSPO_PO1000000192	License ID	CB67783	Issued By	PT Mutuagung Lestari	Issued On	22-05-2018	Start Date	7/7/2018	End Date	6/7/2019	License Status	Active
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	Status: Comply																
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>The mill did not use any of processing aids both of tools and material.</p>																
	Status: Comply																
5.2	Supply chain model																
5.2.1																	

<p>The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.</p>	
<p>Bukit Puteri POM are applying SCCS Module E (MB) and product claim are done under mass balance.</p>	
	<p>Status: Comply</p>
<p>5.2.2 The site can use one (1) or a combination of supply chain models as audited and certified by the CB.</p>	
<p>No combination supply chain models applied, the mill only applied SCCS MB-module E.</p>	
	<p>Status: Comply</p>
5.3	<p>Documented procedures</p>
<p>5.3.1 The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.</p>	
<p>The SCCS procedures are describes in document of SOP for sustainable supply chain and traceability, appendix 5 version 2 issued no.: 4, year of 2018. It is aim for identifying product's traceability with supply chain Mass Balance Model. Person in charge have been pointed to ensure the operation of mill based on the applicable procedure consist of Mill Manager, Administration Office Staff, Weighbridge Staff, Ramp Staff, CPO & Dispatch Staff and PSQM Staff. The SOP has been covering all element of the SCCS Module E, such as: responsibility, document control, FFB delivery from the estate, receiving FFB at mill, FFB processing, CPO and OK despatch, non-conforming product and/or document, product claims, outsourced contractors, training, reclassification of mill's SC model, production volume, conversion factors, internal audit, complaints, and management review.</p> <p>Based on interview to personnel key such as WB operator and production clerk, they has been aware regarding to the SCCS SOP, and able to demonstrate the SOP.</p>	
	<p>Status: Comply</p>
<p>5.3.2 The site shall have a written procedure to conduct annual internal audit</p>	
<p>The SCCS internal audit are planned annually as describes in the SCC and Traceability procedure version 2, 2018, clause of 17.0. The mill has an internal audit procedure namely document no.: SD/SDP/PSQM/IAP to determine whether the mill conforms to the RSPO SCC requirement and the RSPO Market Communication and claims. The internal audit are hold by trained internal auditor.</p> <p>The latest internal audit are conducted on 25-27 September 2018, there was 1 NC identified during audit, it was related to RSPO information displayed on non-certified product (CPO) delivery document. Regarding to this matter, the mill has been analyse the root cause: there was a miss-understandings of the WB operator towards the ticket stamping procedure. As well as the corrective action has been done against the root cause and the non-conformity, namely: refreshment the proper stamping procedure of product document to the WB officer and informs the purchaser about the exact certification status of the product. The auditor are re-verified regarding to this NC during ASA-1.3, and no found any of stamp of RSPO information on the non-certified product delivery.</p>	
	<p>Status: Comply</p>
5.4	<p>Purchasing and goods in</p>
<p>5.4.1 The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier</p>	
<p>The mill did not buy/purchase any of RSPO certified oil palm product from outsider/traders/distributor. The audit are done to palm oil mill which only sell its own product.</p>	

	Status: Comply
5.4.2	
The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents	
Mechanism for handling non-conforming oil palm products and/or documents are describes in SOP Sustainable Supply Chain and Traceability (SOP No. 2, issued on February 2018) clause of 10.0. In the SOP mentioned that:	
<ul style="list-style-type: none"> - Where there is contamination of RSPO mill shall inform GTM accordingly if the downgraded affects the delivery timeline to the customer, - Overselling of product shall be treated as non-conforming product (the mill shall be notified and investigate immediately), - For material received with insufficient information for verification or any error in incoming document shall be treated as non-conforming document, shall be investigated, verified and corrected in order to allow processing of material. 	
	Status: Comply
5.5	Outsourcing activities
5.5.1	
In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.	
The mill are outsourced the third party for product transporting, the agreement document are observed during audit: Agreement with Jasa Korporate Sdn Bhd valid since 1 May 2016 up to 30 April 2019 (three years) on CPO transportation to selected buyer destination. Address in: Kuala Langat, Selangor Darul Ehsan, and Malaysia.	
	Status: Comply
5.5.2	
Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:	
<ul style="list-style-type: none"> a. The site has legal ownership of all input material to be included in outsourced processes; b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d. d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance 	
The transporter hired are not included in the RSPO SCC certificate scope of Bukit Puteri POM, the auditor verified that:	
<ul style="list-style-type: none"> 1. The mill are has legal ownership of product 2. The mill has agreement with the transporter hired (as much as 2 transporter), and the auditor have access to the outsourcing contractor during audit (however there is no CPO transporting activity during visit to mill). 3. The mill has document control system for contractors, contained in the SCC and traceability procedure clause of 12.0 	
	Status: Comply
5.5.3	
The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	
Record of the names and contact details of all contractors used are contained in the agreement document: Agreement with Jasa Korporate Sdn Bhd valid since 1 May 2016 up to 30 April 2019 (three years) on CPO transportation to selected buyer destination. Address in: Kuala Langat, Selangor Darul Ehsan, Malaysia.	

	Status: Comply																
<p>5.5.4 The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products</p> <p>Has been verified during the ASA 1.3 that the mill are hired two (2) transporter for CPO product, the name and address has been informed in clause of 5.5.3.</p>																	
	Status: Comply																
5.6	Sales and goods out																
<p>5.6.1 The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer</p> <p>Sighted the sales document which contain information of buyer (name and address), delivery date, description of the product, supply chain model and quantity of the products. During April 2018 – March 2019 verified that the mill are made a provision CSPO sales contract with Nuri Refinery (under SDP), for example provision contract reff no.: S/CCE/1902/CPO0021B, dated 18 Feb 2019, contract quantity: 250 MT, type SC: RSPO-CPO MB, buyer address: Lot 27, PT234, Bandar Sultan Sulaiman, 42000 Port Klang, Selangor, Malaysia.</p> <p>Based on interview to SQM staff, it was told that the all the RSPO-MB sales contract during those period has been downgraded to conventional, the refinery has been inform to GTM (Global Trading Marketing) regarding the status of contract for the palm trace announcement purpose.</p>																	
	Status: Comply																
5.7	Registration of transactions																
<p>5.7.1 Supply chain actors who:</p> <ul style="list-style-type: none"> • are mills, traders, crushers and refineries; and • take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable <p>The audit are done to CPO mill namely Jabor POM, which take legal ownership of oil palm product. Based on document review there is no CSPK sold under RSPO claim. Has been registered in RSPO Palm-trace, detailed in table below:</p> <table border="1"> <tr> <td>Member Name</td> <td>Bukit Puteri Oil Mill</td> </tr> <tr> <td>Member ID</td> <td>RSPO_PO1000000192</td> </tr> <tr> <td>License ID</td> <td>CB67783</td> </tr> <tr> <td>Issued By</td> <td>PT Mutuagung Lestari</td> </tr> <tr> <td>Issued On</td> <td>22-05-2018</td> </tr> <tr> <td>Start Date</td> <td>7/7/2018</td> </tr> <tr> <td>End Date</td> <td>6/7/2019</td> </tr> <tr> <td>License Status</td> <td>Active</td> </tr> </table>		Member Name	Bukit Puteri Oil Mill	Member ID	RSPO_PO1000000192	License ID	CB67783	Issued By	PT Mutuagung Lestari	Issued On	22-05-2018	Start Date	7/7/2018	End Date	6/7/2019	License Status	Active
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<p>5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> • Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. 																	

- Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.
- Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.
- Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.

All the transaction under SDP including Bukit Puteri POM are handled by GTM (Global Trading Marketing), The mill through GTM has been done the following actions in the RSPO IT Platform:

- Shipping Announcement and confirm: There is no CSPK and CSPO sold under RSPO.
- Trace: Regularly tracing are done by the GTM.
Based on sales contract and delivery consignment, there was CSPO delivered to SDP Nuri since April 2018- March 2019 which on the contract is under RSPO-MB, confirmation to PSQM staff told that the contract is a provision sales contract. The CSPO product delivered (under RSPO-MB sales contract) to buyer (SDP Nuri) has been downgraded to conventional. In this regard, information of product final sales and its RSPO status (confirmation of downgrade of product) has been informed to the mill.
- Remove: remove are done to CSPK stock as much as 906 MT on 18 April 2019 (ST-TR-c5093f30-7caf) due to the sold under conventional. Remove are done to CSPO as much as 5000 MT on 22 April 2019 (ST-TR-d09c1c92-49f4).

Status: Comply

5.8 Training

5.8.1

The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff

RSPO SCC training plan are contained in the company's training plan for FY 2018/2019, the training are planned once a year. The next training are planned on June 2019.

Status: Comply

5.8.2

Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed

The latest SCCS training to the personnel key in the BP POM are conducted on 6 April 2018, the personnel involved is office clerk, WB clerk, processing assistant, mill manager and production clerk.

SCCS training has been done to transporter (Jasa Korporat) on 20 March 2018, as much as 4 attendants (tanker driver).

Status: Comply

5.9 Record keeping

5.9.1

The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements

The mill has been maintain the SCC record in accurate, complete, and up-to-date for all element of SCC. The auditor are able to access those record and report.

Status: Comply

5.9.2

Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory

requirements and be able to confirm the certified status of raw materials or products held in stock	
In Standard Operating Procedure for Sustainable Supply Chain and Traceability (SOP No. 2, issued on February 2018) explained that:	
<ul style="list-style-type: none"> • For RSPO Certified Unit, record area maintained for a period of two (2) years • For RSPO and ISCC Certified Unit, record area maintained for a period of ten (10) years 	
	Status: Comply
5.9.3	
The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	
The estimated volume of certified palm oil and palm kernel has been set by the mill and recorded by the auditor in this summary report (basic information). There was only 1 categorize set by the mill, namely: RSPO-MB.	
The record of volume purchased and product claimed are available for over 12 months, the auditor has been verified the records since April 2018 up to March 2019.	
	Status: Comply
5.10	Conversion factors
5.10.1	
Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries	
The audit are done to palm oil mill, the conversion factor of product has been set based on daily production ratio, during April 2018 – March 2019 the average of conversion rate is:	
<ul style="list-style-type: none"> - CPO → 20.74% - PK → 4.34% 	
	Status: Comply
5.10.2	
Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	
The conversion factor of CPO and PK are updated in daily basis based on daily production ratio.	
	Status: Comply
5.11	Claims
5.11.1	
The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	
There is no use of RSPO trademark on product, document and for promotion purpose as well.	
	Status: Comply
5.12	Complaints
5.12.1	
The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	
The SOU 10 Bukit Puteri POM has Procedure for External Communication under Standard Operation Manual version 01 dated 1 November 2008. The procedure outlines the process in receiving and addressing grievances from both internal and external stakeholders. In addition, there is a Whistle blowing Policy (GPA No. B5) dated 27 February 2014 which is	

essentially an internal mechanism for reporting, investigating and remedying any wrongdoing, as defined in Clause 4.3 of the same policy in order to ensure that stakeholders are “able to raise genuine concerns in good faith without fear of reprisals or retaliation.”	
	Status: Comply
5.13	Management review
5.13.1 The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken Based on the SCC and traceability SOP, the management review are planned once a year.	
	Status: Comply
5.13.2 The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	
The latest management review are conducted on 13 March 2019, the input that included is: <ul style="list-style-type: none"> - Result of internal audit status of preventive and corrective action → there was NC raised against SCCS during the latest internal audit, the mill has been set the action plan and the current NC status has been closed. Continuously monitoring and procedure refreshment should be done by the mill to the WB operator and others key personnel. - Customer feedback (no feedback from customer) → no customer feedback received by the mill since April 2018-March 2019. - Follow-up action from management review, changes that could affect the management system and recommendation for improvement → the mill shall improve the mass-balance report. 	
	Status: Comply
5.13.3 The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	
The latest management review are conducted on 13 March 2019, it has been included the improvement of the effectiveness of management system and resources needed.	
	Status: Comply

3.2.3 (Module E) CPO Mills - Mass Balance Requirements

Clause	Requirement																
E.1	Definition																
E.1.1	<p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p> <p>The Bukit Puteri POM are applied SCC Modul E-MB since it receive and processed the FFB from certified and non certified sources.</p> <p>Status: Comply</p>																
E.2	Explanation																
E.2.1	<p>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&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> <p>The estimated tonnage of CPO and PK that could potentially be produced by the BP POM for period of 07 July 2018 to 06 July 2019 recorded in the ASA 1.2 report and certificate. The actual tonnage produced for the latest 12 months (April 2018-March 2019) has been verified by the auditor during ASA 1.3.</p> <table border="1"> <thead> <tr> <th>Product</th> <th>Projection of 07 July 2018 to 06 July 2019 (MT)</th> <th>Actual production April 2018-March 2019 (MT)</th> <th>Projection of 07 July 2019 to 06 July 2020 (MT)</th> </tr> </thead> <tbody> <tr> <td>CSPK</td> <td>2,589</td> <td>2,062.71</td> <td>2,467</td> </tr> <tr> <td>CSPO</td> <td>10,507</td> <td>9,822.65</td> <td>10,855</td> </tr> </tbody> </table> <p>Status: Comply</p>	Product	Projection of 07 July 2018 to 06 July 2019 (MT)	Actual production April 2018-March 2019 (MT)	Projection of 07 July 2019 to 06 July 2020 (MT)	CSPK	2,589	2,062.71	2,467	CSPO	10,507	9,822.65	10,855				
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CSPK	2,589	2,062.71	2,467														
CSPO	10,507	9,822.65	10,855														
E.2.2	<p>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).</p> <p>The SOU10 Bukit Puteri POM are RSPO member registered under Sime Darby Plantation, Bhd with no.: 1-0008-04-000-00 (September 8, 2004). Also has been registered in RSPO Palm-trace, detailed in table below:</p> <table border="1"> <tbody> <tr> <td>Member Name</td> <td>Bukit Puteri Oil Mill</td> </tr> <tr> <td>Member ID</td> <td>RSPO_PO1000000192</td> </tr> <tr> <td>License ID</td> <td>CB67783</td> </tr> <tr> <td>Issued By</td> <td>PT Mutuagung Lestari</td> </tr> <tr> <td>Issued On</td> <td>22-05-2018</td> </tr> <tr> <td>Start Date</td> <td>7/7/2018</td> </tr> <tr> <td>End Date</td> <td>6/7/2019</td> </tr> <tr> <td>License Status</td> <td>Active</td> </tr> </tbody> </table> <p>All the transaction under SDP including Bukit Puteri POM are handled by GTM (Global Trading Marketing), The mill through GTM has been done the following actions in the RSPO IT Platform:</p>	Member Name	Bukit Puteri Oil Mill	Member ID	RSPO_PO1000000192	License ID	CB67783	Issued By	PT Mutuagung Lestari	Issued On	22-05-2018	Start Date	7/7/2018	End Date	6/7/2019	License Status	Active
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- Shipping Announcement and confirm: There is no CSPK and CSPO sold under RSPO.
- Trace: Regularly tracing are done by the GTM.

Remove: remove are done to CSPK stock as much as 906 MT on 18 April 2019 (ST-TR-c5093f30-7caf) due to the sold under conventional. Remove are done to CSPO as much as 5000 MT on 22 April 2019 (ST-TR-d09c1c92-49f4).

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:

- Complete and up to date procedures covering the implementation of all the elements in these requirements;**
- 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.**

The SCCS procedures are describes in document of SOP for sustainable supply chain and traceability, appendix 5 version 2 issued no.: 4, year of 2018.

It is aim for identifying product's traceability with supply chain Mass Balance Model. Person in charge have been pointed to ensure the operation of mill based on the applicable procedure consist of Mill Manager, Administration Office Staff, Weighbridge Staff, Ramp Staff, CPO & Dispatch Staff and PSQM Staff.

The SOP has been covering all element of the SCCS Module E, such as: responsibility, document control, FFB delivery from the estate, receiving FFB at mill, FFB processing, CPO and OK despatch, non-conforming product and/or document, product claims, outsourced contractors, training, reclassification of mill's SC model, production volume, conversion factors, internal audit, complaints, and management review.

Status: Comply

E.3.2

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

The BPPOM, SOU10 Mill has mechanism for accepting the FFB which explain that the weight bridge operator shall verified the FFB delivery letter and issued FFB receive ticket. There was any two kind of FFB receive, consist of form by each own estate of SOU10- Sime Darby Plantation (**Certified FFB**) and FFB Delivery Order (**non-certified FFB**) from the outsider crop plantation. Both of document are explain the origin of fruit and quantity, etc. The RSPO information (RSPO Stamp) are sighted in the FFB delivery consignment from the own estate (certified source), while for non-certificate source of FFB there are no specific code. The WB operator explained that the FFB records from certified source and un-certified sources shall be separated in the database for ratio calculation purpose.

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.

The mill has been verify all the FFB receive and processed from certified and non-certified sources, the following table are the record of FFB receive since April 2018-March 2019:

Month	FFB Received from Certified Sources (total per month), MT	FFB Received from Non-certified Sources (total per month), MT
Apr-18	4,069.45	1,525.66
May-18	3,724.96	1,510.73
Jun-18	4,049.32	1,097.08
Jul-18	3,258.24	1,124.44
Aug-18	2,604.36	1,483.32
Sep-18	3,569.33	1,439.95
Oct-18	4,029.6	1,594.29

Nov-18	4,359.64	2,673.57
Jan-19	4,739.09	1,649.99
Feb-19	4,344.35	1,984.69
Mar-19	4,620.99	2,585
Total	43,369.33	18,668.72

Status: Comply

E.4.2

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

In the clause of 15.0 of SCC and traceability procedure mentioned that mill shall maintain monitoring the records of production volume, if there is projected overproduction of certified volume shall notify the respective CB accordingly for any updates in the RSPO-IT Platform.

Compared between last year projection and actual production since April 2018- March 2019, there is no overproduction for both CPO and PK.

Product	Projection (MT)	Actual production (MT)
CSPK	2,589	2,062.71
CSP0	10,507	9,822.65

Status: Comply

E.5

Record keeping

E.5.1

- a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.**
- b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.**
- c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.)**

The record and balance of all receipts of RSPO certified FFB and deliveries are done by the mill on three-monthly basis, the following table is record since April 2018 – March 2019 (12 months):

Date	FFB Received from Certified Sources (total per month), MT	FFB Received from Non-certified Sources (total per month), MT	PK Cert	PK Non Cert	Total CSPO Produced , MT	Total Non-certified Produced , MT	Total CSPO Sold (Palm Trace)	Total CPO sold as conventional	PK dispatch as RSPO Certified Sustainable from Mill (total per month), MT	PK dispatch as conventional (total per month), MT
April-June 2018	11,843.73	4,133.47	554.36	194.35	2,509.78	876.05	-	3,394.17	-	840.38
Jul - Sept 2018	9,431.93	4,047.71	402.43	171.12	1,984.57	853.47	-	2,610.90	-	537.55
Oct - Dec 2018	12,514.90	6,126.14	481.77	236.28	2,577.22	2,577.22	-	3,632.22	-	668.32
Jan - March 2019	13,704.43	6,219.68	624.15	286.41	2,751.08	1,248.85	-	3,400.16	-	921.28
Total	47,494.99	20,527.00	2,062.71	888.16	9,822.65	5,555.59	0.00	13,037.45	0.00	2,967.53

Status: Comply

3.3. Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
ASA 1.3	SOU10, Bukit Puteri does not use RSPO logo, not use trademark on product.	√
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of Trademark Use	X or√
ASA 1.3	SOU10, Bukit Puteri does not use RSPO logo, not use trademark on product.	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or√
ASA 1.3	SOU10, Bukit Puteri does not use RSPO logo, not use trademark on product.	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or√
ASA 1.3	SOU10, Bukit Puteri does not use RSPO logo, not use trademark on product.	√
	Status: Comply	

3.4. Summary of RSPO Partial Certification.

Compliance of the uncertified management units of Sime Darby Plantation 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 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 unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 1 in Liberia. Sime Darby Plantation Bhd has informed the Time Bound Plan progress through representative's office in Indonesia. MUTU has considered that Sime Darby Plantation Bhd is comply with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by the Sime Darby Plantation Bhd Indonesian representative on January 2019 by the Head of PSQM.

MUTU has verified partial certification for un-certified unit's subsidiary of Sime Darby Plantation 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 remains unresolved social i.e. from *Serikat Petani Kelapa Sawit* (SPKS), but improvements are ongoing.
- PT Budidaya Agro Lestari waiting for land title process to some of its operational area.
- PT Guthrie Pecconina Indonesia – Sungai Jernih Estate currently is in HGU process
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labor 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.

3.4.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: Companies are already doing internal audits. There are internal audit reports for each company, latest partial internal audit are held in July – December 2018, for five units and three smallholder scheme.</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit, latest partial internal audit are held in July – December 2018, for five units and three smallholder scheme.</p> <ul style="list-style-type: none"> - PT Mitra Austral Sejahtera : 2 December 2018 - PT Budidaya Agro Lestari : 2 April 2018 - PT Guthrie Pecconina Indonesia – Sungai Jernih Estate : 8 aug 2018 - PT Sandika Natapalma – Karya Palma Estate : 10 July 2018
i.	No replacement after dates defined in NIs Criterion 7.3 of: <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>Company Group/Holding Statement: 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>Auditor Verification:</p>


		<p>Sime Darby Plantation Bhd sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2nd revision on 24 June 2016. Current status of LUCA report of SDP Bhd is has been sent the 19 report of LUCA to RSPO on Aug 2018, responded by RSPO with need clarification. The companies ensuring reporting of disclosure of liability progress to RSPO and according to the CB's correspondency with RSPO Remediation and Compensation.</p>
<p>i.</p>	<p>Any new plantings since January 1st 2010 must comply with the RSPO New Plantings Procedure.</p>	<p>Company Group/Holding Statement: 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 http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14</p> <p>Auditor Verification:</p> <ul style="list-style-type: none"> • Karya Palma Estate (PT Sandika Natapalma) and Baturus Estate (PT Budidaya Agro Lestari) any new planting after January 1st 2010 and due to not conduct NPP. • RSPO NPP process has been completed in 2011 for a new mill in Liberia.
<p>ii.</p>	<p>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>	<p>Company Group/Holding Statement: Sime Darby (Liberia) Plantation Inc. Status: Box G - Close for Monitoring Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/46 PT Mitra Austral Sejahtera (Sime Darby Sdn Bhd) Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/29</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are land conflict in :</p> <ul style="list-style-type: none"> • PT Mitra Austral Sejahtera, this issue are remain being resolved with RSPO dispute settlement facilities • PT Bina Sains Cemerlang, this issue was raise on 22 April 2017 and still being process to resolve.

iii.	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company Group/Holding Statement: No stakeholder comments or complaints received.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are no labour dispute in company unit.</p>
iv.	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company Group/Holding Statement: None noted. No stakeholder comments or complaints received.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There is any legal non-compliance for company under SDP waiting for land title process, i.e.:</p> <ul style="list-style-type: none"> • PT Sime Indo Agro 1,652 Ha • PT Aneka Inti Persada 421.31 Ha • PT Bina Sains Cemerlang 308.25 Ha • PT Bersama Sejahtera Sakti 765 Ha • PT Langgeng Muaramakmur 1,162 Ha • PT Paripurna Swakarsa 1,120 Ha • PT Swadaya Andika 63 Ha • PT Bahari Gembira Ria 1,639 Ha • PT Guthrie Pecconina Indonesia 4,133 Ha • PT Perkasa Subur Sakti 1,286 Ha

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 ASA-1 .3

1.1. Identification of Findings at ASA-1 .3

NCR No.	: 2019.01	Issued by	: Ebnu Holdoon
Date Issued	: 27 th April 2019	Time Limit	: ASA-1.4
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	Minor 5.1.2 : Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive action plan. The action plan shall identify the responsible person/persons.		
Non-Conformance Description & Evidence observed (filled by auditor) During the field visit at the workshop of Sime Darby Bukit Puteri, it were observed that : <ul style="list-style-type: none"> i) Lubricant Mineral Oil spillage and grease residual waste found at the backyard of the workshop parking bay ii) 3 tractors had been parked outside the servicing bay area without containment and the lubricant spillage was found on the ground This is nonconformity against indicator 5.1.2 stating that Bukit Puteri Estate does not cover the implication of potential impact from the current practices in the workshop in order to mitigate negative effects being occurred.			
			
Root Cause Analysis (filled by organization audited):			
Corrective Action (filled by organization audited):			
Preventive Action (filled by organization audited):			
Assessor Evaluation and Conclusion (filled by auditor):			
Verified by	:		

NCR No.	: 2019.02	Issued by	: Mahas
Date Issued	: 26/04/2019	Time Limit	: ASA 1.4
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and those efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.		
Non-Conformance Description & Evidence observed (filled by auditor): Based on the stakeholder meeting minutes on 27/02/2019, the Estate Senior Asst (Azlee) has outlined a SIA plan to mitigate, implement and monitor of the discussed issues. There are 5 plans available with timetables that consist of PIC and timeline. However, sighted during stakeholder meeting on 14/02/19, Dr. Hasnizadila (Doctor from Clinic Zara), has requested the estate management to monitor the hygiene and cleanliness factor of foreign workers as she mentioned workers seeking treatment from the clinic seen not practicing good hygiene and cleanliness. There is no evidence that this issue was consulted with foreign workers and been addressed in an action plan.			
Root Cause Analysis (filled by organization audited):			
Corrective Action (filled by organization audited):			
Preventive Action (filled by organization audited):			
Assessor Evaluation and Conclusion (filled by auditor):			
Verified by	:		

3.5.2 Opportunity for Improvement

No	Ref. Std.	Description Deskripsi
1	4.6.11	Based on the latest MCU by clinic Chung on Feb/March 2019 to as much as 56 pesticide workers, it is known that there were doctor's recommendation to conduct further investigation against two (2) pesticide operators: <ul style="list-style-type: none"> - Chabbi Lal Pahadi regarding to the glyphosate effect - Uttam Barman regarding to the triclopyr effect. The estate has set the action plan to follow up the recommendation, namely both workers planned to be sent for further examination to VMO (Vendor Medical Officer) on May 2019. The Estate needs to ensure the implementation of action plan regarding to the MCU result.
2	4.8.1	Consideration to improve the knowledge and awareness of Personal In Charge of Scheduled Waste
3	5.3.2	Consideration to improve the oil sump containment based on the capacity usage of Schedule waste store and workshop area.
4	SCCS COC 5.8.1	Implementation of RSPO SCCS Training Plan in June 2019







3.5.4 Noteworthy Positive Components

No	Ref Std	Descriptions
1		Company has commitment to implement the principle of sustainable palm oil management.
2		Good filing system maintained at mill and estates.

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

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>Contractors of FFB Transport Bukit Puteri Estate</p> <p>A local contractor had been interviewed during the audit. He had been in contract with the Bukit Puteri Estate for 10 years and as far from the interview, the payment method, contracting and workers welfare had been a priority concern of Sime Darby Estate management. The method of payment will be done by online banking and payment been made on monthly basis based on the contract available and invoice issuance. Sighted no complain has been logged in towards the estate Management and the contractor are satisfied with SIME DARBY Management handling the contract. The contract had been done yearly and made in headquarters of Sime Darby In Damansara. SIME DARBY management also giving information to the workers during signing the contract that the workers should obey the company policy, code of conduct (COBC Booklet) and being briefly together with the workers and supplier. The Contractors also kept the contract agreement copy with them. Every single policy and legal requirement are clearly stated in the contract and obeyed by the contractor. Based on the interview, sighted no complain towards the management office and Bukit Puteri Mill</p>	<p>The company will continue to keep a good relation between the contractors and Sime Darby management and also further engagement will be enhanced from time to time.</p>
<p>Sime Darby Workers Union Representative (Bukit Puteri Mill)</p> <p>The workers representative had been interviewed in SIME DARBY Bukit Puteri Mill. He works as a foreman in the workshop. Based form the interview, The NUPW represantative had expressed satisfaction working in Sime Darby. He had been 4 years working in Sime Darby and the company had treated him well as safety as the main priority for them.</p>	<p>SIME DARBY Bukit Puteri Mill will continue to give cooperation towards workers union and will keep continue on the safety requirement of the company.</p>
<p>Community Head Tok Empat</p> <p>Interview had been done with the local community of the nearby village next to the estate at Sg Koyan. Based on the interview, the representative had expressed their satisfaction with Bukit Puteri Mill and estate manager regarding their action of handling the request, grievances and Complain. The interaction between the estate management and local community had also cooperative as few of the local villagers had been working with Sime Darby Bukit Puteri. No issues related to environment as</p>	<p>SIME DARBY Management will keep a good relation with Local Community from the respected estate and help them in the related matters.</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>the authority of Pahang state had regularly checked on the mill. Few of the request had been discussed with the estate and mill manager and the respond had been done by the estate manager in 7 days as per communication procedure.</p>	
<p>Gender Committee of Bukit Puteri Estate.</p> <p>Based on the interview, the gender committee is having a good relation with the Estate management and the manager had discussed accordingly if any related issues arising with the management. The management always support the gender committee meeting and taken care the request made by the gender. All related information regarding gender policies, memo and information on women had been communicated accordingly</p>	<p>No issues raised. The gender committee are satisfied with Sime Darby management regarding communication with them.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY		
4.1	Formal Sign-off of Assessment Findings		
	<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 style="text-align: center;">Signed on behalf of:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top; padding: 20px;"> <p>Sou 10, Bukit Puteri, Sime Darby Plantation Bhd Estate Manager</p> <div style="text-align: center;">  En. Mohd. Esa Mohidin Wednesday, 08 May 2019 </div> </td> <td style="width: 50%; vertical-align: top; padding: 20px;"> <p>Mutuagung Lestari Lead Auditor</p> <div style="text-align: center;">  Sandra Purba Wednesday, 08 May 2019 </div> </td> </tr> </table>	<p>Sou 10, Bukit Puteri, Sime Darby Plantation Bhd Estate Manager</p> <div style="text-align: center;">  En. Mohd. Esa Mohidin Wednesday, 08 May 2019 </div>	<p>Mutuagung Lestari Lead Auditor</p> <div style="text-align: center;">  Sandra Purba Wednesday, 08 May 2019 </div>
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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	National Council of Welfare & Social Development Malaysia - NCWSDM	No. 17, Jalan 1/48A, Bandar Baru Sentul, 51000 Kuala Lumpur, Malaysia.	makpem@gmail.com	Email	16 April 2019		No
2	National Union of Plantation Workers (NUPW)	No 2, Jalan Templer, 46000 Petaling Jaya, Selangor	sangkara@mail.tm.net.my	Email	16 April 2019		No
3	TRAFFIC - the wildlife trade monitoring network	Unit 3-2, 1st Floor, Jalan SS23/11, Taman SEA, 47400 Petaling Jaya, Selangor, Malaysia.	tsea@traffic.org	Email	16 April 2019		No
4	Environmental Management and Research Association of Malaysia (ENSEARCH)	30-3, Jalan PJU 5/16, Dataran Sunway, Kota Damansara, 47810 Petaling Jaya, Selangor	admin@ensearch.org	Email	16 April 2019		No
5	Contractors of FFB Transport Bukit Puteri Estate	Pahang Darul Makmur, Malaysia	-	Direct Interview	26 April 2019	Yes	
6	Sime Darby Workers Union Representative (Bukit Puteri Mill)	Pahang Darul Makmur, Malaysia	-	Direct Interview	26 April 2019	Yes	
7	Community Head Tok Empat	Pahang Darul Makmur, Malaysia	-	Direct Interview	26 April 2019	Yes	
8	Gender Committee of Bukit Puteri Estate.	Pahang Darul Makmur, Malaysia	-	Direct Interview	26 April 2019	Yes	

Appendix 2. Assessment Program		
DATE TARIKH	24 – 27 April 2019	
PLANNED TIME PELAN MASA	PROCESSES / CLAUSES TO BE AUDITED PROSES / FASAL YANG DIAUDIT	AUDITOR
Wednesday 24 April 2019		
12.00 -	Travelling from Jabor to Bukit Puteri	All Auditor Team
Thrusday 25 April 2019		
08.00 – 09.00	Opening meeting in Bukit Puteri POM <ul style="list-style-type: none"> • Auditee Speech (Introduction of PIC, Profile of Mill and Estates Management Unit) • Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Determine of Field Visit Audit, Transparency and Confidentiality Clarification) 	All Auditor Team
09.00 – 13.00	Document Audit and Field visit to Bukit Puteri PALM OIL MILL <ul style="list-style-type: none"> • Supply Chain verification (FFB Receiving, Weighbridge) • FFB Sorting, Processing Activity, Despatch CPO; Occupational Health & Safety Aspect • Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond & Land Application of POME • Interview &FGD with Worker’s Union, Gender Committee, Local Contractor, All Local Communities. 	SDP MAH EHS EHS
13.00 -14.00	Break and Lunch	
14.00 – 16.30	<ul style="list-style-type: none"> • Field Observation Verification & Completion of Check List in Mill 	All Auditor Team

DATE TARIKH	24 – 27 April 2019	
PLANNED TIME PELAN MASA	PROCESSES / CLAUSES TO BE AUDITED PROSES / FASAL YANG DIAUDIT	AUDITOR
Friday, 26 April 2019 08.00 – 13.00 13.00 – 14.00 14.00 – 17.00	<p>Document Audit and Field Visit to Bukit Puteri Estate</p> <ul style="list-style-type: none"> • Agronomy (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application, Peat Area (Water management, etc.); Environmental, Occupational Health & Safety Aspect (PPE Used in Harvest, Manure & Pesticide Application) and Worker Welfare • Conservation Aspect (Inspection of HCV Identified Area, Riparian/Waterways Zone, Reservoir, Forest Area); Legal Demarcation Aspect (Inspection of Legal Boundary Stones, Community Buffer Area/Enclave) • Worker's Facilities Aspect (Housing, Day-care, Sports Facilities, Employees Meeting Hall, Sanitary Facilities) & (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) <p>Break and Lunch</p> <ul style="list-style-type: none"> • Field Observation Verification & Completion of Check List in Estate 	<p align="center">SDP</p> <p align="center">MAH</p> <p align="center">EHS</p> <p align="center">All Auditor</p>
Saturday, 27 April 2019 08.00 – 10.00 10.00 – 13.00 19.05 – 20.10	<p>Closing Meeting:</p> <ul style="list-style-type: none"> • Presentation of Assessment Findings by Auditor Team (Explanation of Identified Nonconformities and Completion of Corrective Timeline, Answer & Questions) • Auditee Response against Assessment Findings <p>Travelling from Site to KL</p> <p>Travelling from KL to Jakarta</p>	<p align="center">All Auditor</p> <p align="center">All Auditor</p> <p align="center">SDP</p>