

***Roundtable on Sustainable Palm Oil Certification
RSPO***

[√] Surveillance

Name of Management : Kok Foh Palm Oil Mill – SOU 16, Sime Darby Plantation, Bhd.
 Organisation
 Plantation Name : SOU 16 – Kok Foh Estate, Sg. Senarut Estate, Muar River Estate, Pertang Estate, Bukti Pilah Estate, St. Heiler Estate and Sg. Sabaling Estate.
 Location : 72109 Bahau, State of Negeri Sembilan, Malaysia
 Certificate Code : **MUTU-RSPO/093**
 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	08 – 12 April 2019	Moh Arif Yusni, Mahaswaran Maliyapan, Khairul Anuar	Taufik Margani	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA 1.3	11 May 2019

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Figure 1. Location Map of SOU 16 Kok Foh

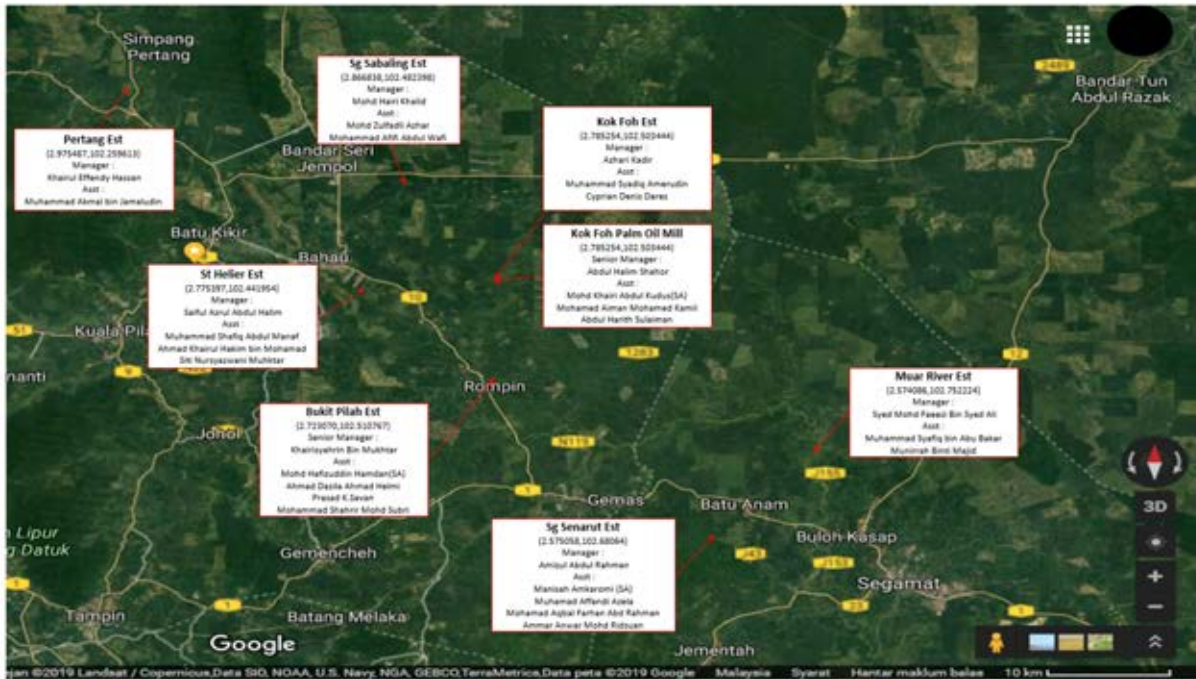


Figure 2. Operational Map of Kok Foh Estate

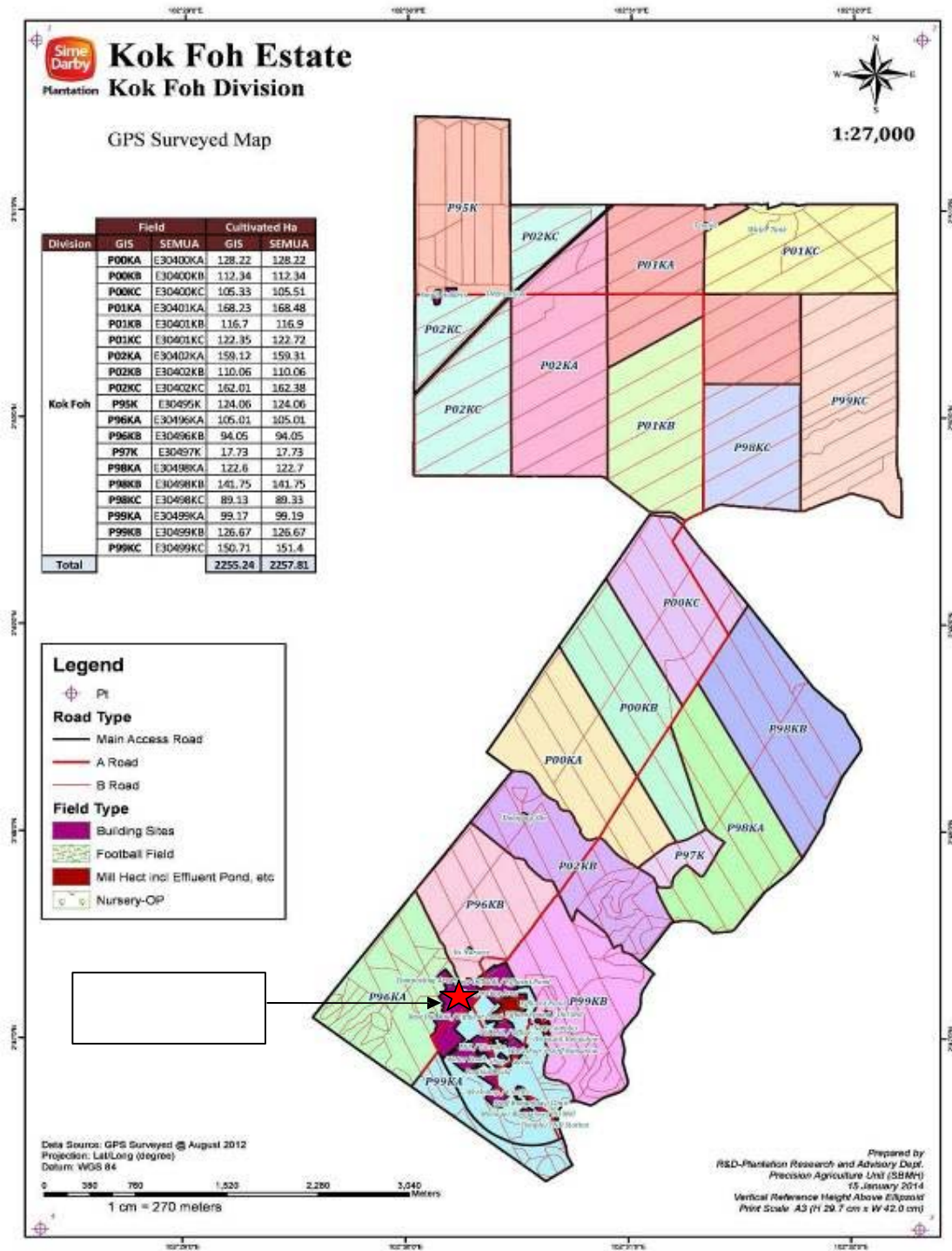


Figure 4. Operational Map of Muar River Estate

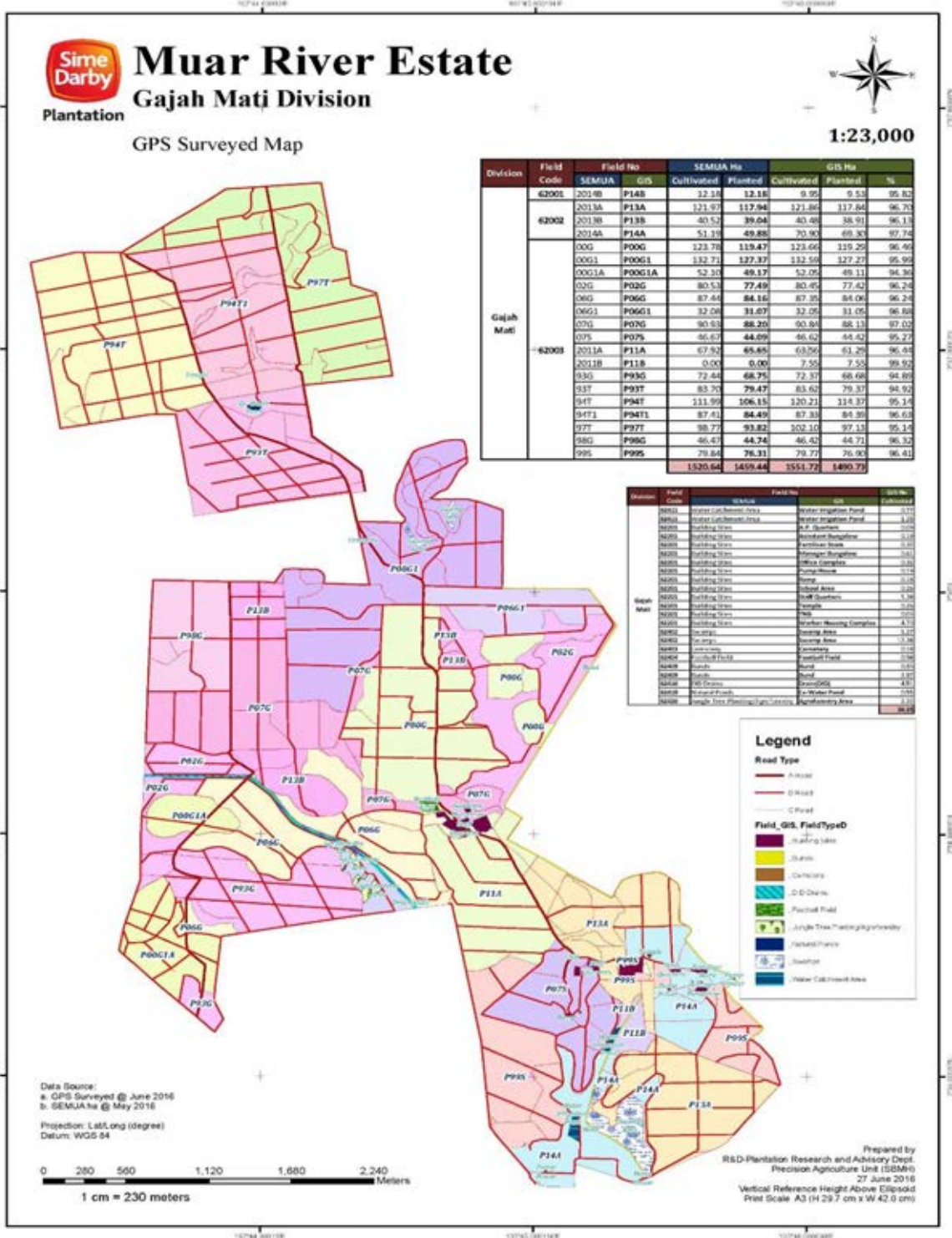


Figure 5. Operational Map of Pertang Estate

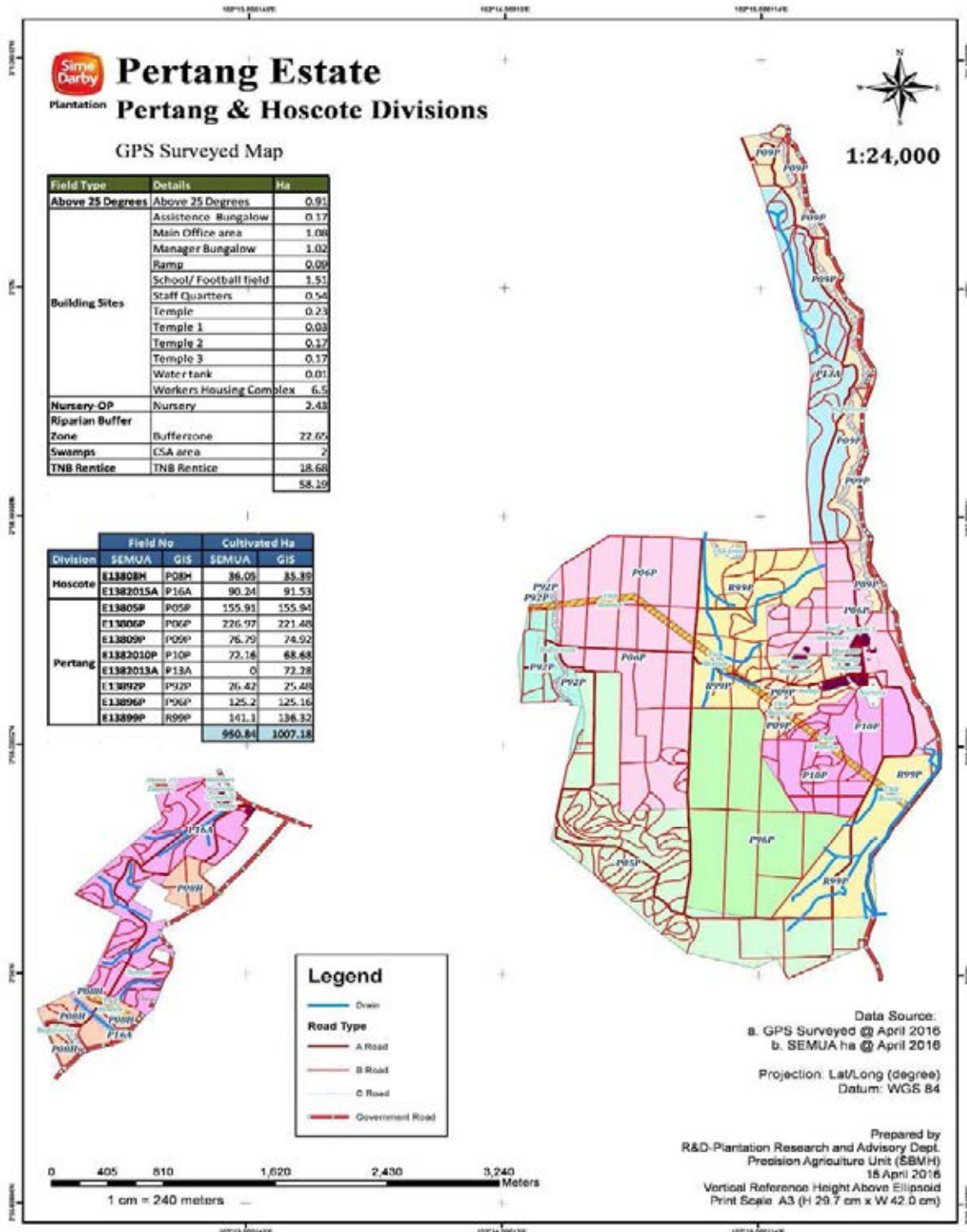


Figure 6a. Operational Map of Bukit Pilah Estate, Kelpin & New Rompin Divisions

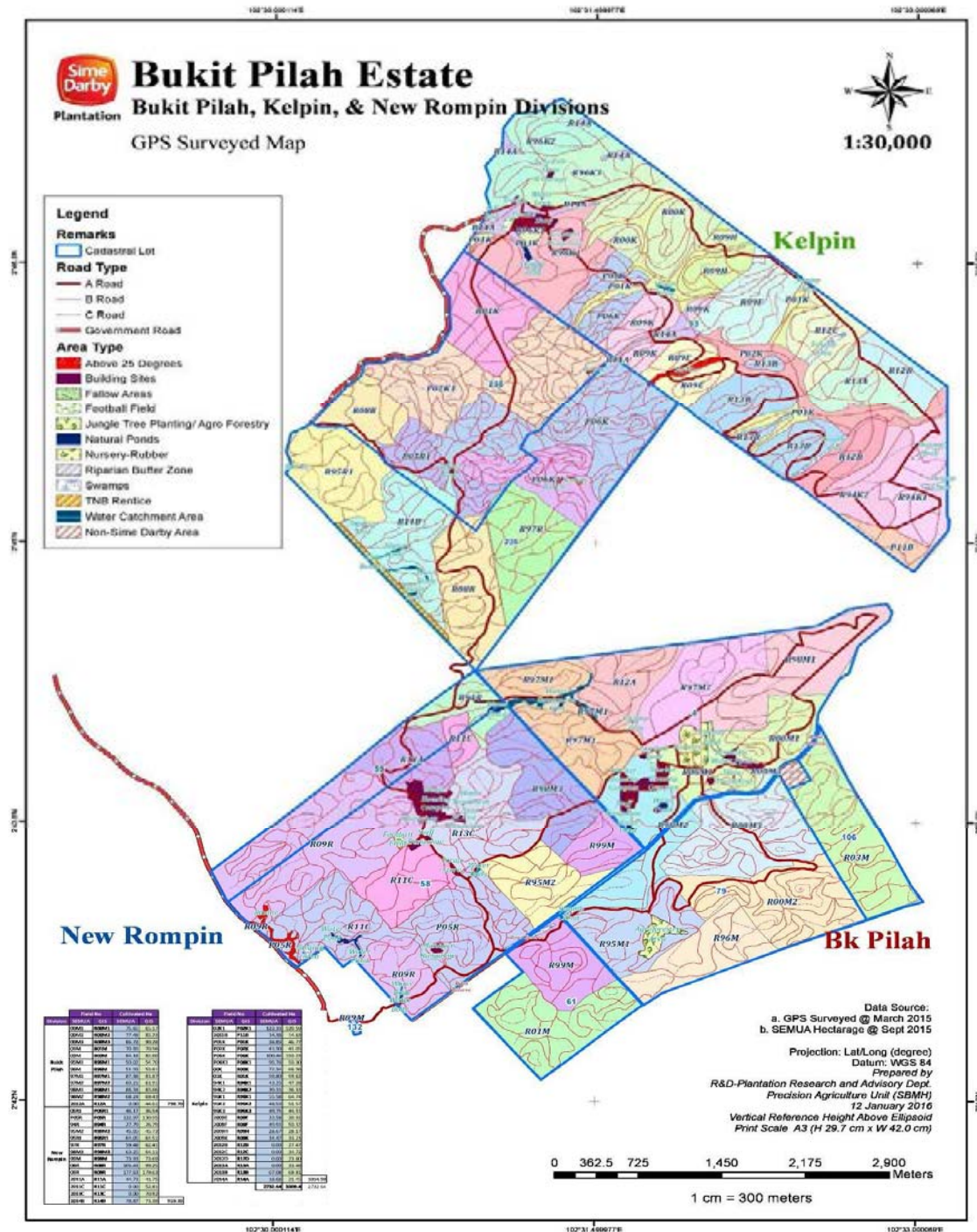


Figure 6b. Operational Map of Bukit Pilah Estate, Sg. Kelamah Division

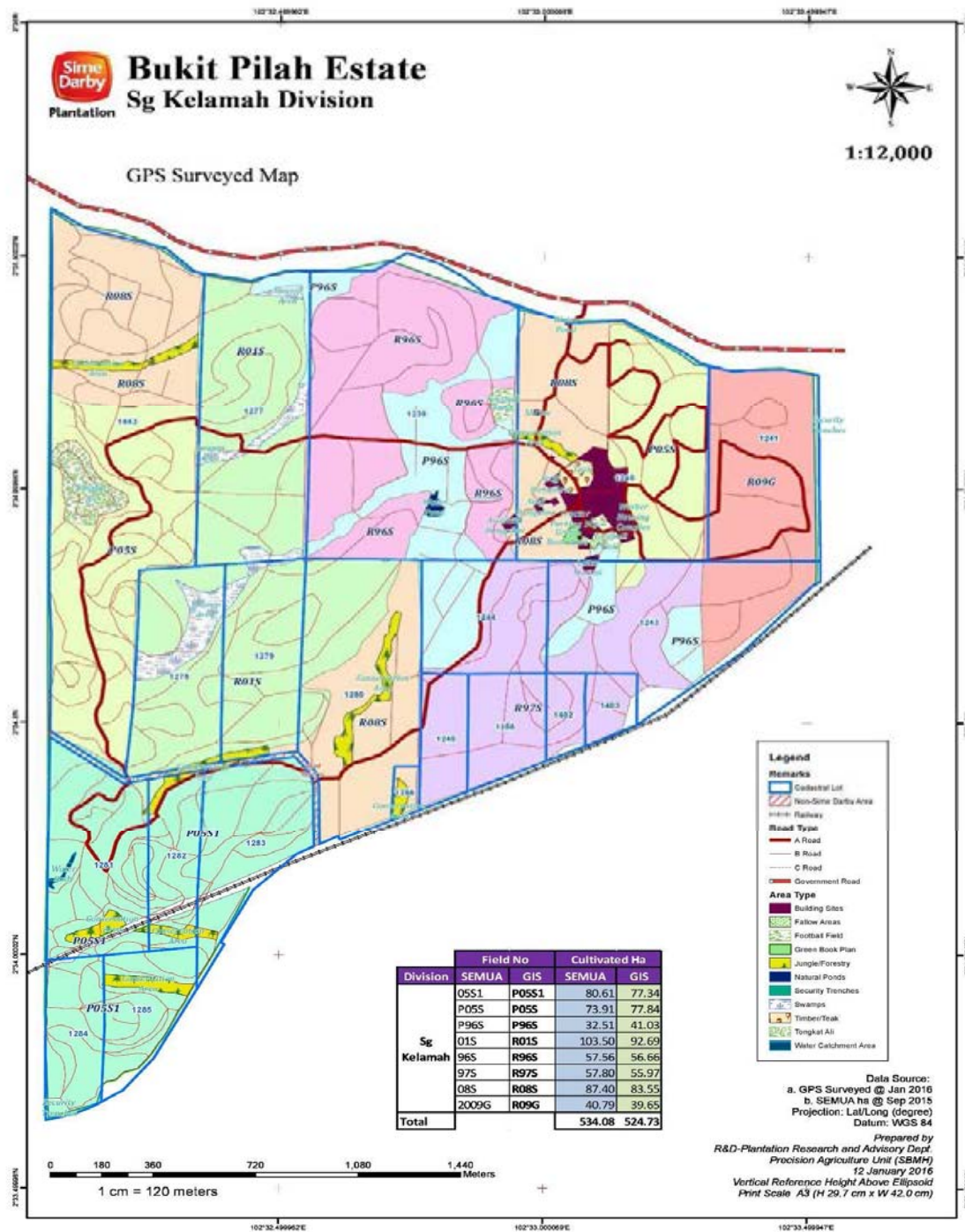
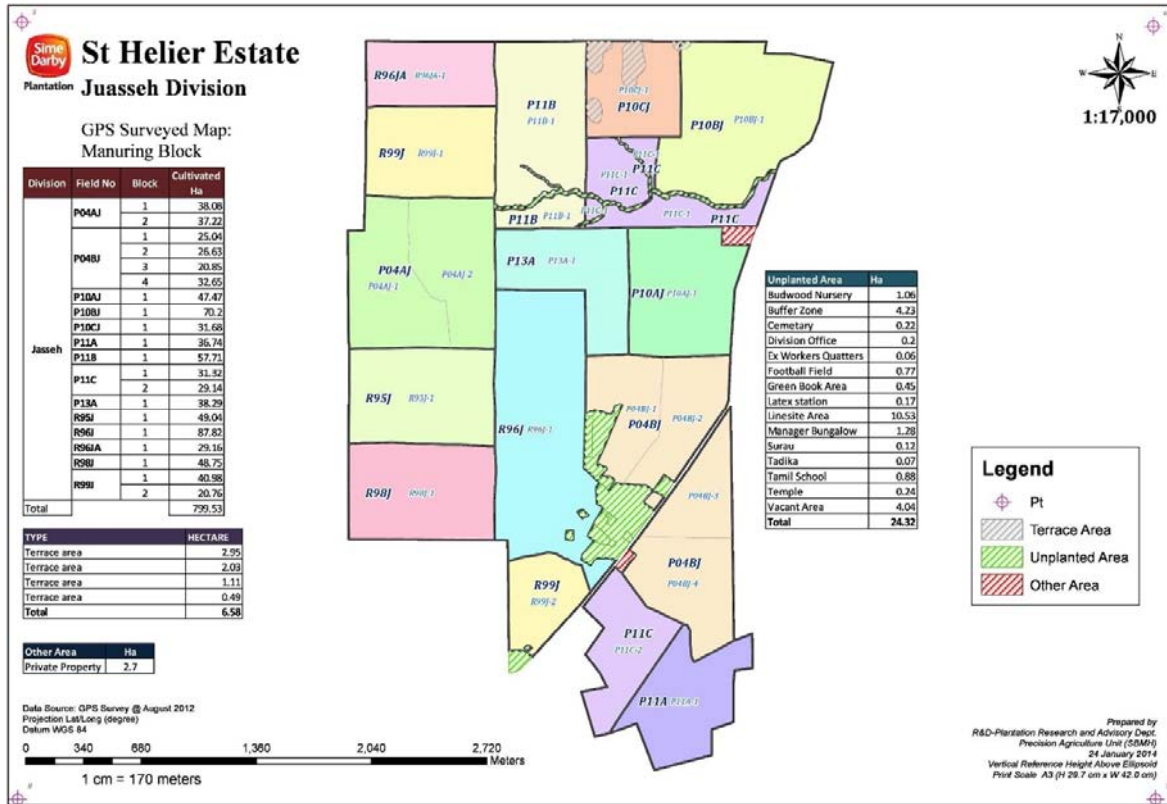


Figure 8a. Operational Map of St. Helier Estate, Juasseh Division



Abbreviations Used

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

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

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> • <i>Malaysian National Interpretation of RSPO Principles and Criteria for Sustainable Palm Oil Production. Endorsed by RSPO Board of Governors 6 March 2015.</i> • <i>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 D / E for CPO Mill)</i> • <i>RSPO Certification System for Principles and Criteria, 14 June 2017</i> 	
1.2	Organization Information		
1.2.1	Organization name listed in the certificate	SOU 16 Kok Foh – Sime Darby Plantation, Bhd.	
1.2.2	Contact person	Shylaja Devi VasudevanNair	
1.2.3	Organisation address and site address	Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia	
1.2.4	Telephone	+(603)78484379	
1.2.5	Fax	+(603) 7848 4363	
1.2.6	E-mail	shylaja.vasudevan@simeдарby.com	
1.2.7	Web page address	www.simeдарby.com.my	
1.2.8	Management Representative who completed the application for certification	Shylaja Devi Vasudevan Nair	
1.2.9	Registered as RSPO member	1-0008-04-000-00 on September 8 th 2004	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill with seven Estates supply base, i.e.: Kok Foh Estate, Sg. Senarut Estate, Muar River Estate, Pertang Estate, Bukit Pilah Estate, St. Helier Estate and Sg. Sabaling Estate.	
1.3.2	Type of certificate	<i>Single</i>	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Kok Foh Oil Mill	Kok Foh Palm Oil Mill, 72109 Bahau, Negeri Sembilan.	2° 46' 30.9" N 102° 30' 44.3" E
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Kok Foh Estate	Ldg. Kok Foh, 72109 Bahau, Negeri Sembilan.	2° 46' 30.9" N 102° 30'44.3" E
	Sg. Senarut Estate	Ldg. Sungai Senarut, 85100 Batu	2° 34' 12.2" N 102° 42'44.2" E

	Anam, Segamat, Johor.		
Muar River Estate	Ldg. Muar River, PO Box 503, 85009 Segamat, Johor.	2° 34' 24.9" N	102° 45' 07.1" E
Pertang Estate	Ldg. Pertang, Simpang Pertang, 72300 Jelebu, Negeri Sembilan.	2° 58' 31.1" N	102° 15' 33.7" E
Bukit Pilah Estate	Ldg. Bukit Pilah, 73500 Rompin, Negeri Sembilan.	2° 43' 17.6" N	102° 32' 18.0" E
St. Helier Estate	Ldg. St. Helier, 72009 Kuala Pilah, Negeri Sembilan.	2° 46' 31.6" N	102° 26' 31.4" E
Sg. Sabaling Estate	Ldg. Sungai Sebalang, 72100 Bahau, Negeri Sembilan.	2° 48' 17.0" N	102° 23' 14.4" E

There is a difference the number of estate with ASA 1.2 due to Sg Gemas Estate has been merged to become one(1) management under Sg Senarut Estate . The Reason being for the merging is due to the size of the area and to streamline the management with Sg Senarut.

1.5	Description of Area Statement		
1.5.1	Tenure		
	• State		14856.95 Ha
	• Community		Ha
1.5.2	Area Statement		
	• Total area		14,856.95 Ha
	• Mature area		6703.82 Ha
	• Immature area		721.69 Ha
	• Mill		23.95 Ha
	• Emplishment		70.96 Ha
	• Replanting Area		215.18 Ha
	• Infrastructure		505.50 Ha
	• Nursery		2.43 Ha
	• HCV		25.60 Ha
	• Rubber area		6,470.97 Ha
	• Others Area		116.85 Ha

There is discrepancy with previous assessment due to the area on ASA-1.3 based on land tittle (Geran Tanah)

1.6	Planting Year and Cycles								
1.6.1	Age profile of planting year								
		Hectarage (Ha)							
	Planting Year	Kok Foh Estate	Sg Senarut Estate	Muar River Estate	Pertang Estate	Bukit Pilah Estate	St Helier Estate	Sg Sebalang Estate	Total
	1992	-	-	-	24.08	-	-	-	24.08
	1994	-	-	190.64	-	-	-	-	190.64
	1996	-	72.41	-	121.92	32.37	-	-	226.70
	1997	-	101.44	93.82	-	-	-	-	195.26
	1998	216.96	-	44.74	-	-	-	-	261.70
	1999	353.38	144.04	76.31	-	-	-	-	573.73
	2000	317.06	248.49	302.65	-	-	-	-	868.20

2001	391.28	555.58	-	-	38.66	-	-	985.52
2002	412.55	23.43	77.49	-	163.52	53.66	-	730.65
2004	-	-	-	-	-	295.09	124.66	419.75
2005	-	143.24	-	145.54	199.82	79.87	-	568.47
2006	-	147.39	115.23	210.1	195.35	-	-	668.07
2007	-	-	132.29	-	-	-	-	132.29
2008	-	-	-	33.34	-	-	-	33.34
2009	-	-	-	69.3	-	-	-	69.30
2010	-	-	-	61.37	-	143.86	-	205.23
2011	-	-	65.65	-	-	-	-	65.65
2012	-	-	-	-	-	87.83	-	87.83
2013	-	-	156.98	-	-	36.8	-	193.78
2014	-	-	49.25	67.3	-	-	-	116.55
2015	-	-	-	87.08	-	-	-	87.08
2016	-	-	-	137.35	-	-	-	137.35
2017	217.84	-	62.11	-	-	-	-	279.95
2018	224.92	-	79.47	-	-	-	-	304.39
TOTAL	2,133.99	1,436.02	1,446.63	957.38	629.72	697.11	124.66	7,425.51
1.6.2	New Planting area after January 2010			Ha				
1.6.3	Planting Cycle			1 st Cycle or 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 (%)	
	Kok Foh Mill	60	189,795.91	39,200.91	20.65	9,688.46	5.10	
	<i>*Production data source from April 2018 – March 2019</i> <i>*there is discrepancy between FFB Received and processing covering 1433.50 MT due to mill shutdown on 3^d- 7th 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)	%	
	Kok Foh Estate	2,292.21	2,133.99	40,613.13	19.03	39,799.86	98.00	
	Sg Senarut Estate	2,964.64	1,436.02	28,366.91	19.75	29,222.62	103.02	
	Muar River Estate	1,516.77	1,446.63	27,630.50	19.10	26,982.92	97.66	
	Pertang Estate	1,101.97	957.38	15,431.27	16.12	15,028.92	97.39	
	Bukit Pilah Estate	3,667.31	629.72	11,121.30	17.66	11,428.96	102.77	

	St Helier Estate	1,992.65	697.11	16,059.10	23.04	16,120.86	100.38
	Sg Sebaling Estate	1,321.40	124.66	3,436.04	27.56	3,348.88	97.46
	TOTAL	14,856.95	7,425.51	142,658.25	19.21	141,933.02	99.49
	<i>*Production data source from April 2018 – March 2019</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill FFB (tonnes/year)		
	Kemuning Estate** (RSPO Certified)	Sime Darby Sdn BHD		2535.45	11,428.96		
	Other Source (Non Certified)	Out grower		-	47,451.81		
	TOTAL				58,880.77		
	<i>*Production data source from April 2018 – March 2019</i>						
	<i>**RSPO –PC 00101 validity 20 May 2015 - 19 May 2020</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 07 July 2018 – 06 July 2019 (tonnes/year)		Actual certified product April 2018 – March 2019 (tonnes/year)		
	• FFB Production		177,781		145,013.80		
	• CPO Production		37,334		33,786.48		
	• Palm Kernel (PK) Production		8,889		7,968.76		
1.8.2	Product selling						
	Tonnage of selling product		Period of actual selling product (April 2018 – March 2019)				
	• 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		30,664.28				
	• CSPK sold as conventional		6,204.740				
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)		
	Kok Foh Estate	2,292.21	2,133.99	43,862	20.55		
	Sg Senarut Estate	2,964.64	1,436.02	30,636	21.33		
	Muar River Estate	1,516.77	1,446.63	29,841	20.63		
	Pertang Estate	1,101.97	957.38	16,666	17.41		
	Bukit Pilah Estate	3,667.31	629.72	12,011	19.07		
	St Helier Estate	1,992.65	697.11	17,344	24.88		

	Sg Sebaling Estate	1,321.40	124.66	3,711	29.77			
	TOTAL	14,856.95	7,425.51	154,071	20.75			
<i>*Projected FFB production for 7 July 2019 to 6 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 (%)	
	Kok Foh	60	154,071	32,355	21.00	8,089	5.25	MB
<i>*Projected CSPO and CSPK production for 7 July 2019 to 6 July 2020</i>								
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			-				
	Others							
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time bound						
INDONESIA								
1	Sekunzir. PT. Indotruba Tengah	2010	Sekunzir	2010	Seruyan and West Kotawaringin District – Central Kalimantan	Certified		
			Seruyan	2010		Certified		
2	Manggala. PT. Tunggal Mitra Plantations	2010	Manggala 1	2010	Rokan Hilir District – Riau	Certified		
			Manggala 2	2010		Certified		
			Manggala 3	2010		Certified		
3	Bukit Ajong PT. Sime Indo Agro	2010	West	2010	Sanggau District –West Kalimantan	Certified		
			West (HGU on process)	2019		-		
			East	2010		Certified		
			East (HGU on process)	2019		-		
			East Plasma	2010		Certified		
			West Plasma	2010		Certified		
4	Teluk Siak. PT Aneka Inti Persada	2011	Teluk Siak	2011	Siak District – Riau	Certified		
			Pinang Sebatang	2011		Certified		
			Aneka Persada	2011		Certified		
5	Sungai Pinang. PT. Bina Sains Cemerlang	2012	Sungai Pinang	2012	Musi Rawas District – South Sumatera	Certified		
			Sungai Pinang (HGU on process)	2020		-		

			Bukit Pinang	2012		Certified
			Bukit Pinang (HGU on process)	2020		-
6	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
7	Alur Dumai. PT Lahan Tani Sakti	2011	Alur Dumai	2011	Rokan Hilir District – Riau	Certified
8	Teluk Bakau. PT. Bhumireksa Nusa Sejati	2011	Teluk Bakau	2011	Indra Giri Hilir District – Riau	Certified
			Nusa Perkasa	2011		Certified
			Nusa Lestari	2011		Certified
9	Mandah PT. Bhumireksa Nusa Sejati	2014	Mandah	2011	Indra Giri Hilir District – Riau	Certified
			Rotan Semelur	2011		Certified
10	Angsana. PT Ladangrumpun Suburabadi	2011	Angsana	2011	Tanah Bumbu District – South Kalimantan	Certified
			Gunung Sari	2011		Certified
			Pantai Bonati	2011		Certified
			KKPA-1 PT.SHE	2013		Certified
			KKPA-4 PT.SHE	2013		Certified
11	Mustika. PT Sajang Heulang	2013	Mustika	2013	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		-
12	Gunung Aru. PT Bersama Sejahtea Sakti	2011	Gunung Aru	2011	Kotabaru District – South Kalimantan	Certified
			Gunung Kemasan	2011		Certified
			Laut Timur	2011		Certified
			Pantai Timur	2011		Certified
			KKPA BSS	2020		-
13	Bebunga. PT. Langgeng Muaramakmur	2011	Bebunga	2011	Kotabaru District – South Kalimantan	Certified
			Bakau	2011		Certified
			Sungai Cengal	2011		Certified
14	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
15	Pondok Labu. PT Paripurna Swakarsa	2012	Binturung	2012	Kotabaru District – South Kalimantan	Certified
			Pondok Labu	2012		Certified
			Rampa	2012		Certified

			Sesulung	2012		Certified
16	Rantau. PT Laguna Mandiri	2012	Rantau	2012	Kotabaru District – South Kalimantan	Certified
			Matalok	2012		Certified
			KKPA Sungai Cengal (1,382 SH)	2014		Certified
			Selabak (PT SAA)	2012		Certified
			Randi (PT SAA)	2012		Certified
			Sangkoh (PT SAA)	2012		Certified
			Lanting (PT LMR)	2012		Certified
17	Betung. PT Laguna Mandiri	2014	Betung	2012	Kotabaru District – South Kalimantan	Certified
			Sekayu	2012		Certified
18	Ungkaya. PT Tamaco Graha Krida	2012	Ungkaya	2012	Morowali District – Sulawesi Tengah	Certified
			Plasma TGK	2020		-
19	Ladang Panjang. PT Bahari Gembira Ria	2012	Ladang Panjang	2012	Muaro Jambi District - Jambi	Certified
			Ladang Panjang (HGU on process)	2020		-
			Plasma BGR	2020		-
20	Rantau Panjang. PT Guthrie Pecconina Indonesia	2012	Rantau Panjang	2012	Musi Banyuasin District – South Sumatera	Certified
			Rantau Panjang (HGU on process)	2020		-
			Bumi Ayu	2012		Certified
			Karang Ringin	2012		Certified
			Napal	2012		Certified
			Napal (HGU on process)	2020		-
			Mangun Jaya	2012		Certified
			Mangun Jaya (HGU on process)	2020		-
			Sungai Jernih	2020		-
			GPI KKPA	2020		-
21	Blang Simpo. PT Perkasa Subur Sakti	2013	Tamiang (PT PPP)	2013	Aceh Tamiang and East Aceh District – Aceh	Certified
			Batang Ara (PT PSK)	2013		Certified
			Blang Simpo-01	2013		Certified
			Blang Simpo-02	2013		Certified
22	MAS. PT Mitra Austral Sejahtera	2020	MAS 1	2019	Sanggau District – West Kalimantan	-
			MAS 1	2019		-
			MAS 1	2019		-
			Plasma MAS	2020		-
23	Lembiru. PT Sandika Nata Palma	2014	Lembiru	2014	Ketapang District – West Kalimantan	Certified
			Awatan	2014		Certified
			Karya Palma	2019		-

			KKPA SNP	2020		-
			Pelanjau (PT BAL)	2019		IC
			Sungai Putih (PT BAL)	2019		-
			Baturus (PT BAL)	2019		-
			KKPA BAL	2020		-
MALAYSIA						
1	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
2	Chersonese SOU 2	2011	Chersonese	2011	Kuala Kurau, Perak	Certified
			Holyrood	2011		Certified
			Kalumpang	2011		Certified
			Tali Ayer	2011		Certified
3	Elphil SOU 3	2011	Kinta Kellas	2011	Sg Siput, Perak	Certified
			Elphil	2011		Certified
			Kamuning	2011		Certified
4	Flemington SOU 4	2011	Flemington	2011	Teluk Intan, Perak	Certified
			Bagan Datoh	2011		Certified
			Sabak Bernam	2011		Certified
			Sg Samak	2011		Certified
5	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
6	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
7	Tennamaram SOU 6	2011	Tennamaram	2011	Bestari Jaya, Selangor	Certified
			Sungei Buloh	2011		Certified
			Bkt Talang	2011		Certified
8	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
9	East SOU 8	2010	East	2010	Carey Island, Selangor	Certified
			Dusun Durian	2010		Certified
			Sepang	2010		Certified
10	West - SOU 9	2010	West	2010	Carey Island, Selangor	Certified
11	Bukit Putri - SOU 10	2011	Bukit Putri	2011	Raub, Pahang	Certified
12	Kerdau SOU 11	2011	Kerdau	2011	Temerloh, Pahang	Certified
			Jentar	2011		Certified
			Mentakab	2011		Certified
			Sg Mai	2011		Certified
			Chenor	2011		Certified
13	Jabor - SOU 12	2011	Jabor	2011	Kuantan, Pahang	Certified
14	Labu SOU 13	2011	Labu	2011	Nilai, Negeri Sembilan	Certified
			New Labu	2011		Certified
			Bradwall	2011		Certified
15	Tanah Merah SOU 14	2010	Tanah Merah	2010	Port Dickson, Negeri Sembilan	Certified
			Sua Betong	2010		Certified
			Bukit Pelandok	2010		Certified
16	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
17	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
18	Kempas SOU 17	2010	Kempas	2010	Jasin, Melaka	Certified
			Kemuning	2010		Certified
			Tangkah	2010		Certified
19	Diamond Jubilee	2011	Bukit Asahan	2011	Jasin, Melaka	Certified

	SOU 18		Diamond Jubilee	2011		Certified
			Serkam	2011		Certified
20	Pagoh SOU 19	2014	Pagoh	2014	Muar, Johor	Certified
			Lanadron	2014		Certified
			Pengkalan Bukit	2014		Certified
			Welch	2014		Certified
21	Chaah SOU 20	2010	North Labis	2010	Chaah, Johor	Certified
			Cha'ah	2010		Certified
			Sg Simpang Kiri	2010		Certified
22	Gunung Mas SOU 21	2010	Gunung Mas	2010	Kluang, Johor	Certified
			Kempas Klebang	2010		Certified
			Bukit Paloh	2010		Certified
			Yong Peng	2010		Certified
23	Bukit Benut SOU 22	2011	Bukit Benut	2011	Kluang, Johor	Certified
			CEP Niyor	2011		Certified
			Lambak / Elaeis	2011		Certified
24	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
25	Hadapan SOU 24	2011	CEP Rengam	2011	Layang-layang, Johor	Certified
			Kulai	2011		Certified
			Layang	2011		Certified
			Seri Pulai	2011		Certified
26	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
27	Melalap SOU 27	2011	Melalap	2011	Tenom, Sabah	Certified
			Sapong	2011		Certified
28	Binuang SOU 28	2009	Tingkayu	2009	Kunak, Sabah	Certified
			Sungang	2009		Certified
			Jelata Bumi	2009		Certified
			Binuang	2009		Certified
29	Giram	2009	Mostyn	2009	Kunak, Sabah	Certified

	SOU 29		Giram	2009		Certified
30	Merotai SOU 30	2009	Imam	2009	Tawau, Sabah	Certified
			Merotai	2009		Certified
			Table	2009		Certified
			Tiger	2009		Certified
31	Lavang SOU 31	2011	Belian	2011	Bintulu, Serawak	Certified
			Kelida	2011		Certified
			Lavang	2011		Certified
			Lavang (SE)	2011		Certified
			Rasan	2011		Certified
			Chartquest	2011		Certified
			Dulang	2011		Certified
			Peroh	2011		Certified
			Pekaka	2011		Certified
			Ruai	2011		Certified
32	Rajawali SOU 32	2011	Rajawali	2011	Bintulu, Serawak	Certified
			Samudera	2011		Certified
			Semarak	2011		Certified
			Bayu	2011		Certified
33	Derawan SOU 33	2011	Takau	2011	Bintulu, Serawak	Certified
			Damai	2011		Certified
			Derawan	2011		Certified
			Sahua	2011		Certified
LIBERIA						
1	Grand Cape Mount	2018	Matambo	2018	Grand Cape Mount, Liberia	IC
			Grand Cape Mount	2018		IC
			Zodua	2018		IC
			Bomi	2018	Bomi, Liberia	IC
			Lofa	2018		IC
P & G (New Britain Palm Oil)						
1	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	
2	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	
3	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
4	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	
5	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	

6	Mosa Kumbango Kapiura Namumdo Waraston	2008	Bebere	2008	West New Britain	Certified				
			Kumbango	2008		Certified				
			Togulo	2008		Certified				
			Dami	2008		Certified				
			Waisisi	2008		Certified				
			Kautu	2008		Certified				
			Karausu	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 smallholders)	2008		Certified				
			LSS Kapiura (847 Smallholders)	2008		Certified				
			VOP Kapiura (551 Smallholders)	2008		Certified				
	<p>Sime Darby has achieved 34 management units in Malaysia, 25 mmanagement units in Indonesia, 10 management units in P&G that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 10 in P&G. In the year of 2016 & 2017 there are three 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. The mills are:</p> <ol style="list-style-type: none"> 1. Angsana Mini Mill, PT Sajang Heulang: Mill stop operate since 2016 and the supply bases is transfer to Angsana POM, PT Ladangrumpun Subur Abadi. 2. Selabak Mill, PT Swadaya Andhika: Mill stop operate since.2017 and the supply bases is transfer to Rantau POM, PT 									

Laguna Mandiri

3. Pekaka, SOU 34: Mill stop operate since 2017 and the supply bases is transfer to Lavang, SOU 31

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 on 2018.

There was change of the Time Bound Plan under Sime Darby on April 2019 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.

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA 1.3	<p>1. Moh Arif Yusni (Lead Auditor). Bachelor of Agriculture, majoring in Plant Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he verified SCCS, Best Management Practices for mill and estate, long term business plan and Integrated pest management.</p> <p>2. Mahaswaran Malipayan (Auditor) 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. At the time of audit, has appointed to verify Legality, social aspect and worker welfare.</p> <p>3. Khairul Anuar bin Abdul Hamid (Auditor), Khairul Anuar is a graduate from University of Alabama at Birmingham with Bachelor of Science in Civil Engineering (environmental) and holds a degree of Associate in Applied Science from the University of New York at Buffalo. A registered Environmental Auditor (EA0079) with the Department of Environment Malaysia. A Certified Erosion Sediment and Storm Water Inspector (CESSWI3309) and also the first batch holder for competency in Environmental Compliance Audit Training from the Natural Resources and Environment Board (NREB) Sarawak. He is also trained in ISO14001 EMS Lead Auditor. 24 years of working experience in various industries and disciplines including a 5 years Lead Estimator role at Honeywell (A Fortune 100 company). At the time of audit, has appointed to verify Safety, environmental, transparency and HCV.</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 auditor Number of days for ASA 1.3 at site: 4.5 days Number of working days for Stage-2 at site : 13.5 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 Sime Darby Plantation SOU-16 Kok Foh to the requirements of RSPO Principles and Criteria for Sustainable Palm Oil Production and Supply Chain Requirement 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) <i>interview</i>, 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 assesment 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

<p>ASA 1.3</p>	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>POM</p> <ul style="list-style-type: none"> - Security and Weigh-bridge. Observation of SCCS implementation - Grading. Observation of FFB grading and quality, OHS and worker welfare implementation. - Sterilizer Station Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare. - Clarification Station Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare. - Boiler Station . Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare. - Engine Room Station. Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare. - Nut and Kernel Station. Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare. - Hydrant No 3. Simulate the facility of emergency - Waste Water treatment plant. Observation related OHS and enviromental management - Water treatment plant. Observation for water usage monitoring and interview with operator related workers welfare and OHS - Sparepart store. Observation for material handling and OHS - Chemical store. Observation for material handling, OHS, and hazardous material handling - Workshop. Observation for OHS and workers welfare - Temporary hazardous waste store. Observation for OHS, material handling, and hazardous waste management - Diesel fuel tank. Observation for OHS and material handling <p>Sungai Senarut Estate</p> <ul style="list-style-type: none"> - Boundaries Block 12 B, Observation on legal boundaries and maintaining of plantation borders. Verified against GPS - Conservation Area Block 12 C, Observation related conservation area - Conservation Area Block 06 A, Observation related conservation area - Harvesting Block OP 01 Observation and interview regarding procedure, FFB Quality and harvesting round, OHS, and worker welfare. - facility (housing, Clinics, sport facility). Observation and interview related to workers welfare such as house facilities, Water, Electricity, Sanitation, workers' wages and benefits, complaints mechanisms and response to complaints - Chemical storage. Field observations related to condition of the storage and management of hazardous and toxic materials. - Fertilizer warehouse. Field observations related to the condition of fertilizer warehouse - Workshop. Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities. - Pesticide mixing area, Observation for pesticides applicator OHS - Hazardous Waste Storage. Field observations related to the management of hazardous and toxic materials - Pesticides applicator Washing/rinse house. Observation for pesticides applicator OHS - Pesticides applicator PPE store Observation for pesticides applicator OHS <p>Muar River Estate</p> <ul style="list-style-type: none"> - Block 18 A, observation about HCV Area
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	<ul style="list-style-type: none"> - Block 18 A, observation about replanting in 2018 - Block 18 A, Observation about EFB application, interview against OHS, and worker welfare. - Block 02 G (harvesting), Observation and interview regarding procedure, FFB Quality and harvesting round, OHS, and worker welfare. - Block 05 G, observation about DID Canal, water sampling area - Boundaries (Next to Kg. Bt. Bakar), Observation on legal boundaries and maintaining of plantation borders. Verified against GPS - Nearby watercourse, observation about water course (Sg. Muar and Sg. Merlimau [+/- 3 km away from estate]) - facility (housing, Clinics, sport facility). Observation and interview related to workers welfare such as house facilities, Water, Electricity, Sanitation, workers' wages and benefits, complaints mechanisms and response to complaints - P2000 13A (spraying) Observation on safe working practices and interview with the spraying workers related type of pesticides use according to the procedure and also worker welfare. - Chemical storage. Field observations related to condition of the storage and management of hazardous and toxic materials. - Fertilizer warehouse. Field observations related to the condition of fertilizer warehouse - Workshop. Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities. - Pesticide mixing area, Observation for pesticides applicator OHS - Hazardous Waste Storage. Field observations related to the management of hazardous and toxic materials - Pesticides applicator Washing/rinse house. Observation for pesticides applicator OHS - Pesticides applicator PPE store Observation for pesticides applicator OHS - facility (housing, Clinics, sport facility). Observation and interview related to workers welfare such as house facilities, Water, Electricity, Sanitation, workers' wages and benefits, complaints mechanisms and response to complaints <p>Bukit Pilah Estate</p> <ul style="list-style-type: none"> - Block 01—K (Harvesting) Observation and interview regarding procedure, FFB Quality and harvesting round, OHS, and worker welfare. - Block 02-K, Observation on legal boundaries and maintaining of plantation borders. Verified against GPS - Fertilizer warehouse. Field observations related to the condition of fertilizer warehouse - Workshop. Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities. - Pesticide mixing area. Observation for pesticides applicator OHS - Hazardous Waste Storage. Field observations related to the management of hazardous and toxic materials - Pesticides applicator Washing/rinse house. Observation for pesticides applicator OHS - Pesticides applicator PPE store Observation for pesticides applicator OHS - facility (housing, Clinics, sport facility). Observation and interview related to workers welfare such as house facilities, Water, Electricity, Sanitation, workers' wages and benefits, complaints mechanisms and response to complaints.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA 1.3	Consultation of stakeholders for by: <ol style="list-style-type: none"> 1. Public announcement at web www.mutucertification.com on 12 March 2019 (https://bit.ly/2K4NfCT) 2. Public consultation by interview with locals of the nearby village. 3. Consultation meeting and interview with Internal Stakeholder (labour union and gender committee) 4. Consultation with NGO (Malaysian Nature Society (MNS) Kuala Lumpur, UNION – AMESU, Centre for Environment, Technology and Development Malaysia – CETDEM, National Council of Welfare & Social Development Malaysia – NCWSDM) via email

	Numbers of input from stakeholders were clarified by the certificate holder
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
ASA 1.3	The next visit ASA 1.4 will be determined 08 – 12 months after the date of certificate issued

3.0. ASSESSMENT FINDINGS

3.1. Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Kok Foh POM, SOU 16 – Sime Darby Plantation, Bhd. operation consisting of one (1) mill and eight (7) oil palm estates.

During the assessment, there were no nonconformities were assigned against Major Compliance Indicator, Minor Compliance Indicators, supply chain requirement for CPO mill and there were five (five) opportunities for improvement were identified. Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5.

MUTUAGUNG LESTARI found that Kok Foh POM SOU 16 – Sime Darby Plantation, Bhd. complied with the requirements of 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 (Module D / E for CPO Mill) and RSPO Certification System for Principles and Criteria, 14 June 2017

Therefore MUTUAGUNG LESTAR's Auditor recommended the RSPO Certification of compliance can be **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 and 1.1.2	<p>Kok Foh Mill and its selected supply base had updated the stakeholder list comprising all the parties their dealing with. This include all the contractor, external and internal stakeholders. Sighted the updated stakeholder list for the year 2018/2019 and the list is updated annually. For the mill side, the list had been verified by Mill Manager with 11 contractors had been engaged by the mill [Chin Mee Hwa Contractor trading – Ming Foh Chin, Ngai Fung Engineering, Ponvel Enterprise, PMT Industries Shah Alam, Sri Sinaco Engineering Works] 63 mills vendors and suppliers had been contacted and 19 agencies and government sector had been engaged. The stakeholder list for the estate had been made comprising all the local agencies in Negeri Sembilan, the local community such as:</p> <ul style="list-style-type: none"> i) Contractors – Cekap Sepakat Enterprise, Lim Beng Kiong, Ah Chye Building Contractor, Asnita Trading, Jubimas Enterprise Sdn Bhd, Sasidharan A/L Achutan, Saratan Enterprise, Subramaniam A/L Palanisamy ii) Vendors Suppliers – sighted among others [Sime Darby Industrial Sdn Bhd., Mega Jaya Engineering & Machinery, Dian Heng Sdn Bhd, ABC Hardware & Stationery Trading, Apex Pharmacy Marketing Sdn Bhd, Bestbridge Sdn Bhd, Chew Trading & Construction, Chop Hai Sin, Hup Thye Hardware Sdn Bhd, K&S Air Conditioning & Refrigeration, Mycrop Sdn Bhd, Tai Heng Electrical & Plumber, Tong Hong Furniture Shop, ELS Tyre Services & Trading] iii) Local Community Heads [NUPW, PPP, Persatuan Surau Ladang, Persatuan Kuil, Gender Comitee, ERT Team, JKKP Ladang, Polis Bantuan Ladang] iv) Other Interested parties of Govt Servant contacted [IPD Jempol, Balai Bomba Bahau, Klinik Kesihatan Bahau, SJK Tamil Ladang Sungai Senarut, SJKT Ladang Sungai Muar, Perkeso Kuala Pilah, JAB Alam Sekitar K Pilah <p>The manager of the estate is the responsible person to communicate the related information with external stakeholder upon request of the information. While communication with the internal stakeholders of each estate and mill will be handled by the assistant managers.</p>

The SOP for the communication and responses are stipulated in the "Standard Operating Manual" – Communication Procedure that are kept in the management office. Management document are available for viewing for the publics at respective unit and have access towards the management document except the confidential document that will be retrieved from headquarters of Sime Darby Plantation Berhad. Documents such as OSH Plan (POM and Estate), Land Title (POM and Estate) HIRARC document, Environmental Aspect Impact (EAI), Environmental Impact evaluation (EIE), Environmental Management Plan (EMP), Risk Assessment and Mitigation plan. Social Impact Assessment (SIA).Assessment date of HCV area had been conducted by PSQM department together with HCV document for the river and water catchment area, Pollution prevention Plan (PPR) together with waste management plan, communication procedure to internal and external parties, and including the human right policy that made available at all estate and management unit of Sime Darby as per field visit and document verification.

The stakeholder meeting had been made centralized and being held at Sg. Senarut Estate meeting room, Muar River Estate Meeting Room and Bukit Pilah Meeting Room respectively. Participation of the external and internal stakeholders is recorded in the attendance and also minute of meetings. Issues were raised by the attendees and recorded. Date and responsible parties to take action and status of action were recorded.

At Muar River Estate, meeting was held on 5th November dated 26th April 2018 and attended by 11 people involved on mill and estate operation of Muar River Estate Similarly at Bukit Pilah Estate meeting was held on 23rd December 2018 and attended 16 people relevant to operations. Stakeholder invitation letter sighted and the attendant list of the stakeholders verified. Minutes of meeting has been recorded in stakeholder meeting in the mill that include issues of workers, Passport and Permit issues for contractors, community safety on the road, and safety aspect of workers working in the mill had been recorded. Sighted the meeting had been chaired by SOU Chairman of Bukit Pilah Estate and the respond regarding the request and enquiries had been attended adequately. Based on the minutes meeting verified, there is no critical issues voiced out by the stakeholders. There is a SOP made available by the company in which response to the stakeholder and clearly stated the stakeholder enquiries standard operating procedures (SPMS)Section 3 Documentation and Communication Version 1 Year 2008, Issues 1, Issued on 01/11/08. The stakeholders are aware related to the procedure and documentation process as the information are being circulated during the stakeholder meeting and morning briefing with the management department.

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.

1.2.1
Management document are available for viewing for the publics at respective unit and have access towards the management document except the confidential document that will be retrieved from headquarters of Sime Darby Plantation Berhad. Documents such as OSH Plan (POM and Estate), Land Title (POM and Estate) HIRARC document, Environmental Aspect Impact (EAI), Environmental Impact evaluation (EIE), Environmental Management Plan (EMP), Risk Assessment and Mitigation plan. Social Impact Assessment (SIA).Assessment date of HCV area had been conducted by PSQM department together with HCV document for the river and water catchment area, Pollution prevention Plan (PPR) together with waste management plan, communication procedure to internal and external parties, and including the human right policy that made available at all estate and management unit of Sime Darby as per field visit and document verification.

Stakeholders were made known of of the publicly available documents through dissemination of information through meetings. Latest meeting with stakeholders FYY 2018/2019 and the yearly meetings were available. NUPW meeting and Legal Registry (LORR) are kept at respective unit for public review whereas confidential documents kept at Sime Darby HQ are retrievable to interested parties.PIC for Bukit Pilah Estate is Mr Muhammad Affandi, the Assistant Manager of Bukit Pilah Estate.

The record of request been made as per information and kept in communication and complaint logbook – external and internal from January 2014 :Sighted from the books – Name , Communication / complaint , person in charge – action taken, date completion and status

There is also File Linesite Complaining Book (Bkt Pilah Estate) with latest example of report/complaint on 13/02/19 for Light went off by Sekh Hafizul. Action taken and completed on 19/02/19 by Sahrul at House No.137B. Clear time frame less than 14 days. Similarly at Sg. Muar Estate, on 15/3/18, SJKT Sg Muar (school) requested assistance in providing medical supply for their First Aid Kit for emergency use during their sports day. Action taken by the estate – Examine and fill up the First Aid box.

Status: Comply

1.3

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

1.3.1

The booklet on 'Code of Business and Ethical Conduct' (COBC) produced by the Sime Darby Plantation Berhad were distributed to all respective units – Sime Darby Subsidiaries, POM and estates. It comprises the 8 elements of company integrity towards better business with external parties. Based on the booklet, criteria no. 6 that has elements of respect for fair of conduct and businesses stated that "Avoiding Conflict of interest ". All directors and employees are expected to make business decisions the best interest of the group" and Clause 6.2 "any director and employee of their family member must not have any financial interest in a supplies customer agent or competitor of the group that include any business dealing or contractual arrangements with any group company". Sighted also in the COBC Booklet that the company will prohibit any forms of corruption, bribery and fraudulent use of funds and resources through Principle 7: Guarding against Bribery and corruption "The group takes a zero tolerance approach towards bribery and corruption and is committed to behave professionally , fairly and with integrity in all our business dealings and relationship wherever the group operates , and implementing and enforcing effective system to counter bribery and corruption. Based on the interview with the contractors and workers, they are aware of the company policy and business conduct of Sime Darby during signing the agreement and had been brief accordingly.

Sighted the business transaction between the Bukit Pilah Estate and contractor Ponvel Enterprise. Work include Road repair Field /Rental Backhoe/Internal Transport from 1/3/19 to 25/3/19. Contract form Doc:430040937 Doc Date:31.03.2019 and Doc:4300461175, Doc Date: 30.03.2019 and the payment made on 08.04.2019 Clearing Doc. 1600016480

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

A mechanism to ensure compliance to legal and other requirement has been documented in LORR and distributed by PQMS [Planation Quality Management System] to all operating units. Sampled the licenses and permits such as MPOB License, license for nursery, permit for purchase and store diesel, permit for pay deduction for temple and surau management in accordance to Sek 24 Act 1955 and etc. There is a "Legal & Requirements Register" established by the PSQM [Plantation Sustainable Quality Management] which was checked and approved for compliance. The interview sessions with mill and estate workers, staff and external stakeholder engagement by the audit team revelead the certificate holder ensuring their legal compliances such as no illegal workers, no child labour, proper schedule waste control / management, mill's continuous monitorings on air, noise and water, minimum wage payment and etc.

2.1.2

Documented procedure has been established and implemented, that reference to Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements was updated which among includes of 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, Estate Hospital Assistants (Registration) Act 1965 -rev. 1990, "National Wage Consultative Council Act 2011, Minimum Wages Order Amendment 2018 has been updated and communicated of the changes of

minimum wages within all operating units.

2.1.3

The LORR which was updated on compliance dated on 31/01/2019 that initiate and monitor by the PQMS team. Cross verified the implementation against the documented SOM [Sub- Section 5.2, Appd 5.2.4a]. The internal audit report for Kok Foh Complex seen dated on 4-8/03/19 resulted with 10 major, 15 minor non-conformities and 11 observations. There is an "Evaluation Compliance Score Card" with annual rating statement of "Need Improvement". 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 list of compliance updated and circulated to mill by the sustainability team from HQ.

2.1.4

The identification of changes is the responsibility of corporate department in HQ whom shall notify in written to the estate and mill representatives of the changes which normally the assistant manager who delegate the information within the related estate staff. 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. As for the issues concerning to environment and OHS, it is the responsibility of EHS unit [under the arm of PSQM] to update and implement the changes at SOU level. For the issues related to foreign workers, the Worker Management Unit will liase with respective sites. The HR team co-ordinates on wages concern issues with all operating units.

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

Based on the area statement, updated as at Jan 2019 the sampled estates have dual crops [rubber and oil palm]. There are evidences of GPS Surveyed by internal R&D department. Area statements, land titles and quit rents were verified which there is a clear information that the land ownership is Sime Darby Planation. No new land aquacition, extention or disposed from previous assessment. The management unit have a clear legal lease from the state government in form of land use right (*Geran Hak Milik Sementara Tanah*) for an area of 14,856.95 Ha.

During the external stakeholder engagement by audit team, such as Community Leader from Kg. Bakar (Muar River Estate) has declared the Sg. Senarut Estate and Muar River Estate has no history of land disputes. Based on the presentation by Bukit Pilah Estate manager, due to the soil type, lesser rainfall and geogrphical reasons, by year 2027, Bukit Pilah Estate is expected to be fully converted into rubber plantation. During mill visit, sighted the mill managing well of the effluent pond sites, latest copies of SDS [Safety Data Sheet] displayed as required by Classification, Labelling, and Safety Data Sheet of Hazardous Chemicals (CLASS) Regulations 2013.

2.2.2

The estate map seen highlighted with presents of boundary markers which attached to phothos taken on site. There is also monitoring activities and GPS coordinates are available to demonstrate whether the boundary demarcation and maintenance are implemented and monitored. During field visit, sighted the estate at certain part of the land area are adjoining to smallholder's plantations [rubber / palm oil], villages and government roads. Sighted the original boundary stones maintained and identified in the map. The POM is on the land of Kok Foh Estate. The mill perimeter found fenced from illegal entrance by outsiders. The mill has no plan of extension of operational area.

2.2.3; 2.2.4; 2.2.5 and 2.2.6

There is no land dispute in the sampled estates as their land titles are legally identified and documented.

Status: Comply

2.3	
Use of the land for oil palm does not diminish the legal rights, or customary rights, of other users, without their free, prior and informed consent.	
2.3.1 There is no evidence the presence of identification of legal, customary or user right or previous land owner.	
2.3.2; 2.3.3 and 2.3.4 There is no negotiated agreement in any of the sampled estates, therefore FPIC not applicable.	
Status: Comply	
PRINCIPLE #3 Commitment to long-term economic and financial viability	
3.1	
There is an implemented management plan that aims to achieve long term economic and financial viability.	
3.1.1 The certificate holder (CH) has long-term management plan period 2019 to 2023. Seen the plan consist and focus on production cost [FFB received, CPO & PK produced, OER and KER]. The processing cost [FFB reception, FFB handling, sterilization, threshing, pressing, clarification, depericarping, kernel recovery, boiler, power generation, storage, laboratory, water treatment plant, POME, workshop and EFB disposal] As for the fixed administrative cost [staff, executive, office, security, general and others. Estate and mill management units informed that there is no plan of land expansion and increment of mill processing capacity in the near future. Furthermore, management unit also informed that there is no smallholder scheme and presence of peat soils within SOU-16 Kok Foh operational areas. Management unit stated that those long-term business plan mentioned above are subjected to be changed and reviewed annually by the CEO. The subject of review is related activities such as profit and loss information from Total Revenue and Total Operating Cost, including information about gross operating cost, profit/loss before tax and profit and loss after tax. Due to profit and land suitability Information from manager unit and long term documents its known if in Bukit Pilah Estate all oil palm will be replanting with rubber.	
3.1.2 Sampled Estate management unit shows replanting program and its realization for period 2015/2016 to 2028/2029. 2004. Hence, Furthermore, estate management units also informed that there is no plan of land expansion for new planting in the near future and there is no smallholder scheme and presence of peat soils within SOU-16 Kok Foh operational areas. Information from manager unit and long term documents its known if in Bukit Pilah Estate all oil palm will be replanting with rubber.	
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 Documents verifications, interview with managements obtained information if there is no change related agronomy and mill procedure. The procedure has been cover all activity in mill and estate. Based on field observation in mill and estate it's known if the procedure has been implemented and the Worker can demonstrated work technique in accordance with procedure. All procedures are provided in English and available on the Estate and Mill Office. The procedures were used by the executives and transferred to the workers through training and socialization. However, procedure in Bahasa Malaysia were presented in document of Pictorial Safety Standards. Moreover, translation of SOP in Bahasa was also available. Based on SOP and WI document review, it could be concluded that all SOP's and WI's were still relevant with the current situation and has covers all aspect of best management practices in the estate, such as planting material, nursery techniques, replanting, land preparation, planting, maturity age, field upkeep, manuring, canopy management, water management in coastal and peat plantings, ablation, ripeness standard, harvesting Interval, loose fruit collection, plant	

protection, weeds control, leguminous cover crop Establishment and rainfall recording. Furthermore for mill, it has covers, reception station, fruit handling, technical works in all processing stations, etc.

Procedure of safe working practices is presented in several documents, i.e. Procedure and/or Work Instructions of technical activities for estate and mill has mentioned safe working procedure aspect, such as safe technical work, personal protective equipment (PPE) requirement, PPE management, etc; Hazard Identification Risk Assessment and Control (HIRAC) and Material Safety Data Sheet (MSDS).

As for the harvesting activities, the results of field visit and interviews with harvesters have pointed out that they have proper knowledge and comprehension towards the procedures for harvesting activity. They have also understood the standard of fruit ripeness of 5 loosen fruits per FFB, frond stacking, fruit stacking, and PPE usage. In addition, the field visit also informed that all employees have understood the technical matters of their works, have been equipped with proper and necessary PPE, and all Supervisors have understood first aid measures to be taken in any case of occupational accident.

4.1.2 and 4.1.3

Update and distribution of procedure (SOP and WI) to all Sime Darby Plantation, Bhd. unit is carried out by Department of PSQM from Main Office. For monitoring of procedure implementation consistency purposes, several mechanism has conducted by the CH, such as Monthly Estate or Mill Manager Report which presented in Kok Foh Mill Manager Production report (physical movement) and Estates Management Committee Meeting, Plantation Advisory report for Kok Foh Mill, Annual RSPO internal audit by team from SQM Central West Region, Quarter Performance Monitoring Visit Report for Muar River Estate, Bukit Pilah Estate and Sungai Senarut Estate visit report which delivered through email. All document reports were available on site. Apart from the above mechanism, the CH also providing a training for workers consistency towards technical implementation.

The above records or report has informed raw data, analysis and mentioned summary notes. Furthermore, Estate and Factory operational records has also recorded on program namely System Application Product and Processing (SAP) which updated on daily basis. All critical parameter points describes were need to be response and follow up by the respective person in charge (PIC) through action plan immediately. Progress of action plan were reported and submitted directly to the upper ordinate. Later on, each (priority) points were discussed, analyzed and presented in monthly meeting by the Manager.

4.1.4

The company has Responsible Sourcing Guidelines revision 1 dated 23 February 2016 page 1 of 1 Guidelines for sourcing of third party Fresh Fruit Bunch (FFB). All of FFB from smallholders should be obedient to national regulation, has not convert from primary forest, peat area, HCV or conservation area after January 2010; zero burning when replanting and others. There are six outsider FFB suppliers was supplied to Kok Foh POM. All the FFB suppliers is based in Negeri Sembilan.

	Status: Comply	
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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 and 4.2.3

Procedure of soil fertility management is presented 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. Both sampling and analysis was conducted by Department Plant Nutrition and Protection from Central West Region of Sime Darby Plantation, Bhd. The samplings were not conducted on the projected replanting areas (about 2 years before replanting). Parameter tested on leaf analysis are macro nutrients (N, P, K, Mg and Ca) and micronutrients (B, Fe, Cu and Zn) content (in dry matter). Furthermore, parameter tested on on soil sampling are soil depth, soil texture, pH, P content (P₂O₅), Organic C, Total N, exchange of Na, K, Ca and Mg, and

cation exchange capacity (CEC). Apart from chemical fertilizer, procedure also mentioned that by products such as empty fruit bunch (EFB) and palm oil mill effluent (POME) could be used as nutrient support for soil fertility.

4.2.2 and 4.2.4

Based on document verifications, the Certificate Holder has performed fertilization using inorganic fertilizers, POME and FFB mulching application. Estate management has monitor the used of fertilizer for period 2019 which presented on Manuring Cost Book, Manuring History and performance monitoring visit report. The report mentioned that up to April 2019, progress of manuring in Estate sampling were in accordance with the schedule.

Apart from chemical fertilizers, organic fertilizers which came from by-products (EFB) has also applied for nutrient cycle purposes. Agronomist has recommend EFB mulching to enhance nutrient K and to retain soil moisture particularly on replanting (immature) areas.

Based on explanation above, it could be concluded that estate management has conducting nutrient cycle strategy through by-products application which aims to enhance soil fertility and moisture.

Status: Comply

4.3

Practices minimize and control erosion and degradation of soils.

4.3.1, 4.3.2, 4.3.4, 4.3.5 & 4.3.6

The CH shows several maps (scale 1:16,000 and 1:30,000) related to soil suitability for oil palm cultivation within SOU-16 operational areas. Summary of soil types and slope distribution on the three sampled estates were available on site. According to the soil series data, it could be concluded that there were no presence of peat soil in the three Sampled Estate. Main limitation was mainly due to very low soil fertility and organic matters.. Main limitation were mainly due to low soil fertility and sandy texture scattered in several areas. Certificate Holder also has a topography maps which shows a generally flat area of 6- 12° and only very small areas of slope. It has been verified by field observation, that the area is relatively flat and there is no contour terrace. Documents verification, interview with managements and field observation there is no issue about soil degradation. Based on field observation the certification holder has a strategy to minimize soil degradation with some treatment as follows making terrace contour in slope area, organic fertilizer and empty bunch application.

4.3.3

Estate management shows road map with scale 1:16,000 and 1:30,000 which informed length of road (main, collection and boundary). Program of road maintenance is presented in annual budget plan, as a part of transportation cost. The activities were consist of manual maintenance, road side pruning, culvert installation, bridge and surface construction reparation equipped with the proper infrastructure and facilities to do such work. Record of road maintenance is presented on the Assistant Logbook and Road Maintenance Program 2019 report. According to the result of field visit, the roads are in good condition and the FFB harvested are smoothly transported to the mill.

Status: Comply

4.4

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

4.4.1

Kok Foh POM

Water management plan for Kok Foh Mill is presented in document of The China Engineers Sdn. Bhd. Kok Foh POM for Identification and Management of waste water for financial year 2018/2019. Six locations Identified – Processing, Boiler, Workshop, Lab, Washroom and Linesite & Office. Prepared by Mohd Khairi Abdul Kudus (AE) and verified by Abdul Halim Shahor (Sr Mgr)

Sg. Senarut Estate

Water Management Plan for Sg Senarut (document entitled Environmental Management Plan – Sungai Senarut Estate Year 2019) This plan include – Water Management Plan, HCV Area/Biodiversity, Energy Management, Replanting Activity,

Waste Management, Workshop, Spraying activity and Workers Housing Complex Area. Prepared by Manisah Amkaromi (AM), Verifie by Amizul Abdul Rahman (Manager)
Water was supplied by the SAJ (Syarikat Air Johor)

Pejabat Kesihatan Segamat conducted an Estate water quality Inspection on 20 March 2019. Three samples were taken – Water Tank, Housing area and Ladang Sg Gemas Pond.

Bkt Pilah Estate

Water Management Plan for Sg Senarut (document entitled Environmental Management Plan – Sungai Senarut Estate Year 2019) This plan include – Water Management Plan, HCV Area/Biodiversity, Energy Management, Replanting Activity, Waste Management, Workshop, Spraying activity and Workers Housing Complex Area. Prepared by Prasad A/L K.Savan (AM), Verifie by Aminorhudin Md Nor (Manager)

Water was supplied by the SAINS (Syarikat Air Negeri Sembilan)

During the field visit at pesticide mixing area. Lack of understanding of the procedure causing the water not contained properly in the sump/bucket provided. It caused the water from the mixing area flowing out onto the field towards the drain.

4.4.2

Sg. Muar Estate

Water used for operational and domestic in Sg. Muar Estate came from Water Company of Johor or *Syarikat Air Johor* (SAJ). There is no natural water source (river or lake) within Sg. Muar Estate Operational areas. Based on interview with Pesticide Applicators at P2000 13A of Sg Muar Estate, it was explained by the workers that conservation areas were prohibited to be sprayed by pesticide and fertilizer. HCV zone was marked with signage. Furthermore, based on Water Quality monitoring at DID water course running through the estate. Three sampling points Upstream, Middle Stream and downstream were taken on quarterly basis (Jan-Apr-Jul-Oct). 15 Parameters tested against Interim National Water Quality Standards of Malaysia (INWQS). Suspended Solid, COD, BOD, NH₃-N, P, DO, Aldrin/Dieldrin, BHC, Chlordane, t-DDT, Endosulfan, Heptachlor, Lindane and Alpha-HCH were tested. Latest report for October 2018 was sighted.

Overall results complied with the Interim National Water Quality Standard (INWQS) limit.

Any Non Conformity in the results resulting in action taken → Corrective / Preventive Action Report for Non-Conforming Water Analysis Result were raised: For example, the result for October COD, DO results were poor. (Form Code :WQ-01/CPAR (1)) . Conclusion/root caused identified. Investigated by Muhammad Syafiq (AM) and Verified by Syed Mohd faeezi Syed Ali.) →Pesticide Analysis in Water was also conducted. (by Maizatul Putri Ahmad Sabri, Chief Chemis II – Lab Services) Test Report No. PL906/2018 dated issued 19/11/2018

4.4.3

Kok Foh POM

For effluent treatment before applied to the land, Kok Foh Mill has 8 ponds which consist of 2 cooling ponds, 2 acidification ponds and 4 anaerobic ponds. Before final discharge, the last anaerobic pond has function a retention pond before discharge to the field. Water discharge quality has been monitored every month, latest (01/04/2019) by Sime Darby Research Sdn Bhd. water and wastewater laboratory.

There are 9 points where samples of water Discharge are taken: Sludge Pit (from Mill), Outlet Cooling Pond no.1, Outlet Cooling Pond No.2, Outlet Acidification Pond No.1, Outlet Acidification Pond No.2, Outlet Anaerobic Pond No. 1, 2 and 3, Pome (land Application) and Final Discharge (land Application) – BOD 671 mg/L < limit 5,000mg/L (LATEST REPORT – SIME DARBY RESEARCH SDN. BHD. Lab Service 01/04/2019s MS ISO/IEC 17025, Testing SAMM No.030) Test report No. EP149/2019, Date Issued:01/04/2019. For land application the BOD level for the final discharge complied with regulation.

Additionally, Final Discharge sample taken on random by DOE (Ref ASNS(B)31/152/000/00 (15) Jld 15, Dated 05 Sept 2018) had found that the BOD analysis at 133 mg/L << 5,000 mg/L limit in the DOE Licence Approval Condition.

The mill have licence to dispose effluent final discharge for land application in Licence No. 002079 (DOE Ref ASNS(B) 31/152/000/005. "Cara Pelupusan Effluen : Atas Tanah & Loji Kompos" – Effluent Disposal Method : Land Application & Compost Plant.

4.4.4

Kok Foh POM

Mill management has records water consumption for oil palm processing, which monitored by Operator of Water Treatment Plant (WTP) Station. For example, record of water consumption from July 2018 to March 2019 in Kok Foh Mill is presented as follows:

Month	Water Used (m ³)
July 2018	24791
August 2018	26613
September 2018	25183
October 2018	25302
November 2018	28,191
December 2018	33392
January 2019	32576
February 2019	35309
March 2019	32818
Total	264,175

According to the Table above, it could be concluded that ratio of water consumption for oil palm processing from the last ten months were ranged from 1.43 to 1.64 m³/ton FFB with average about 1.28 m³/ton FFB. These figures were above company target which was about 1.40 m³/ton FFB.

Status: Comply

4.5

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

4.5.1

The company has committed to implement integrated pest management (IPM) which presented in procedure of ARM Section 15 about plant protection which already covers early warning system, census and analysis, biological and chemical pest population management and monitoring.

The IPM program for eac estate sampling is consist of monitoring of barn owl, census of rat, ganoderma and planting of beneficial plants such as *Turnera subulatan*, *Cassia cobanensis* and *Antigonon leptopus*. Estate management informed that there is no significant pest incidence during 2018. Census of ganoderma and rats were available. Integrated pest management program was implemented by the company are monitored and evaluated every month. The evaluation is in the form of a Matrix of pest infestation and diseases symptoms that describes the type of pest; infestation average; analysis of the infestation, level to the threshold; conclusion to determine control techniques if needed. Based on data and summary of census of 2019 in three estate sample it is known that there are no pest infestation and disease symptom that exceed the economic threshold.

4.5.2

The Company has conducting several trainings which aims to maintain workers knowledge and skills towards oil palm pest and disease management, for example as follows:

- Bagworms awareness training on 18 September 2018 on Sg Senarut Estate
- Bagworm monitoring inspection By MPOB on 28 March 2019 Sg Senarut Estate
- Ganoderma Census training on 04 January 2018 in Muar River Estate
- Bagworms awareness training on 18 September 2018 on Bukit Pilah Estate

Based on interview with workers, for example workers at Sungai Senarut Estate confirmed that workers has understood on IPM aspect i.e.: methodology census, type of pests and diseases and management controlling.

Status: Comply

4.6**Pesticides are used in ways that do not endanger health or the environment****4.6.1**

Procedure of ARM policy Section 15 about 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 avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leave control, the use of Ally (Methyl Metsulfuron) could be substitute with Touch Up (Isoprophyl Amine Glyphosate). Records of pesticides used in sampled estate were available and verified during field observation to chemical store.

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, 4.6.3, 4.6.4; 4.6.8

The use of pesticides has been documented by each estate that explains the name of the active ingredient, LD50, % active ingredients, the number of applications, the total active ingredients used, the total FFB production, pesticides units / Hectare, application hectare and the amounts of pesticide / hectare. In periode 2018 there is no use of pesticides to control pests and diseases in estate sample. This is reinforced by the results of the census which show that pests during 2018 was still below the economic threshold. Based on a review of documents and interviews with management staff and workers, certificate holder did not perform the application of pesticides from the air.

4.6.5; 4.6.7 and 4.6.9

Evidence of pesticide application by trained person and in accordance with application guidelines in product label and storage guidelines shall be available. Appropriate safety equipment shall be provided and utilized. All precautions attached to the products shall be properly observed, applied, and understood by workers. Based on documents verifications, field observation and interview with foreman and sprayer as follows:

- Field observation and interview with foreman and sprayer on Muar River Estate for spraying activities using Glyphosate, the workers has been equipped with shoe type PPE, face-protection glass, apron, shirts and trousers, masks and nitrile gloves. The type of PPE has been in accordance with the recommendation in MSDS Type Glyphosate
- Based on field observation its known if the workers were able to explain and demonstrate its job in accordance with the SOP, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example HCV area and riparian zone, as well as PPE's to be used as well as its management.
- Field observation in pesticide storage ihas been equipped with MSDS that contains information on the potential hazards (health, fire, reactivity and environmental) and how to work safely with the chemical product. That all MSDS are available and suitable for pesticides. The risk symbols, hazard level instructions, and PPE used are shown correctly.
- Field observation in residential complexes indicate that no use of pesticide and other agrochemical containers is used for domestic purposes
- The mixed pesticide bring to the field using special tank to reduce environmental pollution and safety aspect.
- Chemical Health Risk Assessment (CHRA) in accordance with the Use and Standards Of Exposure Of Chemicals Hazardous To Health (USECHH) Regulations 2000 have been conducted
- The certification unit has been conducted several training for pesticide applicator as follows:
 - Sprayer inter pump training on 15 February 2019 in Sg Senarut Estate
 - Safety training for Trunk injection on 1 March 2019 in Muar River Estate
 - Selective weeding training on 2 January 2019 in Muar River Estate
 - Sprayer inter pump and safety training on 07 January 2019 in Muar River Estate
 - Inter pump training for sprayer on 29 November 2018 in Bukit Pilah Estate
 - Training for sprayer on 10 December 2018 in Bukit Pilah Estate

4.6.6

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. There is no revision of procedure. Based on observation to Pesticide Store in estate sample, it was found that the store was properly maintained as required. The store was locked, has fire extinguisher standby, emergency shower located beside the store, MSDS, labelling and signage were available as required on OSH Act 1994, stacking pallet, exhaust fan in operating condition, PPE available and first aid box were also available. Furthermore, based on observation to employees housing area, it could be concluded that there is no used pesticide containers which reused for domestic purposes. All used containers were send and stored on the schedule waste Store.

4.6.10

All used containers were send and stored on the schedule waste Store. The record of used pesticide containers balance was available. The used containers later on to be disposed by the Clinco Waste Management, Sdn. Bhd. Which permitted by *Jabatan Alam Sekitar* (Environment Agency).).

4.6.11

The Certificate Holder has conducting medical check-up which conducted twice a year. The company can show a list of spraying workers in each of Estate. Medical surveillance done in yearly basis, latest surveillance conducted on 13th – 14th February 2019 for 26 workers. As per OSHA 1994 and USECH 2000 regulation, medical surveillance for sprayer who exposed various chemical (Soda Ash, Alum, Chloride of lime / Canyon/ Glyphosate, kenlon, Eborbait), no toxic level was detected. Need yearly surveillance monitoring and also recommend for healthy life style programmed.

4.6.12

Schedule waste Keeper mentioned that pregnant and breastfeeding women is prohibited to works related to pesticide. However, according to list of pesticide operators' record in Estate Sampling, it was known that all applicators were male.

Status: Comply

4.7

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

4.7.1

Occupational safety and health (OSH) policy Kok Foh (POM and Estates) was issued by the Managing Director of Sime Darby Plantation Bhd. in January 2015. The policy declared that mill management is committed to pursue compliances towards Legal and other related OSH requirements. To provide adequate knowledge through education, training and experience which in return will help to maintain good competency for employees, preventing work accident, as well as providing a safe and healthy working environment. The Management is also committed to fulfill their responsibilities where possible, to prevent accident at workplace and promote safe and harmony working environment for all staff. The policy is communicated to personnels on information board and is available in English and Bahasa Melayu. Socialization towards safety working practices was achieved through training and safety town hall which were regularly conducted annually, safety briefing meeting during morning muster and inspection which conducted daily.

The OHS working plan for Kok Foh Mill is presented in the OSH Programmed FY 2018/2019 that was prepared by the Assistant Manager. The plan consisted of program such as ESH Org Chart, ESH risk management, incident reporting, emergency preparedness and response, chemical safety management, personal and boundary noise management, contractor safety management, vehicle and safety machinery safety management, air emission management, scheduled waste management, communication, inspection, health and hygiene monitoring program, awareness and competency training, as well as reporting /licensing. Consequently, working plan for Estates is presented in the OSH Programmed FY 2018/2019 that was prepared by the Assistant Manager from respective estates. They contain Environment Safety and Health (ESH) risk management, ESH structure, incident reporting, emergency preparedness response, chemical safety management, contractor safety management, vehicle and machinery safety management, health and hygiene monitoring programme, OSH training, as well as inspection on PPE, fire extinguisher, first aid kit, signages and MSDS, contractor, motorcycle and workers lisences. OSH program for sampled estates were available.

Kok Foh POM and the selected estates verified OSH implementation on the field by conducting daily inspections, and

safety briefings during morning muster. Additionally, annual internal inspection was also carried out by the Plantation Advisor and Plantation & Mechanization Department. CH were able to show evidence of implementation of the program, which explained the following indicators.

4.7.2

Kok Foh POM

The Hazard Identification, Risk Assessment and Risk Control (HIRARC) document for financial year (FY) 2018/2019 was sighted. The document covers all working activities type in every stations. The HIRARC analysis describes and explains job step, hazard, effect, existing control, type, probability, severity level, risk assessment (low, medium, high) and recommended risk control. Latest review of the document for specific work type were conducted after incident occurrence. 5 different departments were reviewed. For example, the latest review was for the Department for Threshing Station, Section: Maintenance. Date of review: 01/04/2019. SOP Activity: Carry out repair works. Reviewed by Mohd Khairi (AM), Approved by Sr Manager – Abdul Halim Shahor.

Bkt Pilah Estate

Periodical HIRARC review for Bukit Pilah was done for Oil Palm and Rubber Operation. The review was made after incident happened. Job that was reviewed: Tapping and Loose fruit collection, Loose fruit collection review due to accident happened on 22/10/2018, where sick leave for 2 days was issued. Accident due to head hit the trailer. Date of review 27/10/2018.

4.7.3

Kok Foh Mill and sampled estates, through OSH committee, have provided safe working practices by conducting adequate socialization and training such as the following:

- OSHC Minute of meeting Number 01/2019 conducted on 22/02/2019 at 3.30 pm in the Ladang Muar River office. It was attended by 14 personnel (Chairman, secretary, employer and employee representatives, and contractor). Two absentees were noted from workers representative.
- Sime Darby Plantation S/B Kok Foh Mill ESH Training Matrix FY 2019 sighted. Training Requirement for Operating Unit (Mills) Target Date Dec-18 till Jun-19. Previous Training conducted. – CENTRAL WEST REGION SOU (16) Training Attendance. Spillage Drill Training. Date 17-Aug-2018. 32 Attendees.
- At Sg. Senarut estate, records of training for the selected harvesters been sighted together evidence providing them with pole strapped with rubber and under full supervision. Training is based from the SOP – Harvesting at Over Head Power Line (OHPL). Only well trained harvesters are allowed to perform the task at the area. Other activity been reviewed such as weeding, pruning and racking, roads and bridges, and security.
- Bkt Pilah Estate recent Training (record in training book)

No.	Subject	Designation	Date	Location	Mandore
1.	Training Spraying	Sprayer	10/12/2018	17B	Prem
2.	Manuring Field 2015A	Supervisor, SA, Mandore, Field worker	27/02/2019	15A	Mohd Hairi – Sr Assit
3.	HCV and RSPO	13 workers	12/03/2019	Muster Ground	Mohd Hairi – Sr Assit
4.	Policies Training	92 Workers (mix)	21/03/2019	Muster Ground	

- PPE is provided to them for free, and for Muar River estate sprayers, their PPE is replaced immediately if they report it to be damaged. Workers confirmed that all medical expenditure is paid for by the company. The usage, cleanliness and storage of Personal Protective Equipment (PPE) such as helmet, mask and safety shoes need apply and as recommended by legal, SOP, OSH Manual and CHRA Assessor recommendation

4.7.4

Kok Foh Mill management has appointed OSH Committee for 2018/2019 which consist of Chairman, one Secretary, three

Coordinators (e.g.: for "Accident Investigation and HIRARC and SOP Review", "Emergency Response team" and "Work Place Inspection/Welfare/Housing Complex") and one representative from Indonesia. The OHS Chairman and Secretary are in coordination with PSQM Head Quarter Officer for any update national regulations and collective agreements. Furthermore, Sampled Estates management has appointed OSH Committee for 2018/2019. Representative from Employer and Employees from Indonesia, India, Nepal and Bangladesh in every estates were available. The OHS Chairman and Secretary are in coordination with PSQM Head Quarter Officer for any update national regulations and collective agreements.

The CH shows safety meeting record, for example as follows:

- Appointment letter for Mr Mohd Azahari, the Chief Auxiliary Police Muar River estate as Safety and Health Committee member dated 01 March 2019. Mr Mhd Azahari signed and accepted the appointment on 05 March 2019.
- Quarterly OSHC Minute of meeting Number 01/2019 conducted on 22/02/2019 at 3.30 pm in the Ladang Muar River office. It was attended by 14 personnel (Chairman, secretary, employer and employee representatives, and contractor). Two absentees were noted from workers representative. Among the issues discussed during the meeting: Previous MOM validation, Working place inspection (WPI) was carried out on 12-15 Feb 2019 recorded in the WPI form, WPI will be conducted every three months, MA presented numbers of patient receiving treatment from Nov 2018 to Feb 2019, types and number of accident happened between Nov 2018 to Feb 2019. LTI report up to Dec 2018 was 12924 hours. OSH Training was also tabled during the meeting, so was the HIRARC review due to accident in Dec 2018.
- Quarterly OSH meeting on 21st Nov 2018 for Bukit Pilah Estate, attended by 30 participants including foreign worker representative. Agenda of the meeting were Safety briefing, Opening speech from the Chairman, MOM validation, Current issues, Accidents, Near misses, WPI results, OSH Training, Environmental issues, ERP team and Conclusion. Next meeting is scheduled in Feb 2019.
- Quarterly OSH meeting on 22nd Feb 201 for Bukit Pilah Estate, attended by 30 participants including foreign worker representative. Agenda of the meeting were Safety briefing, Opening speech from the Chairman, Previous MOM validation (21/11/2018), Current issues, Accidents, Near misses, WPI results, OSH Training, Environmental issues, ERP team and Conclusion. Next meeting is scheduled in May 2019.

4.7.5

Accident of emergency procedure is presented in Mill Quality Management System Standard Operation manual (MQMS SOM) dated November 1st 2008. Flowchart of emergency handling was presented in Appendix 5.5.3.3. Based on observation to, Kok Foh POM, Sg Senarut Estate, Muar River Estate and Bukit Pilah Estate – Fertilizers Store, Chemical Store, Scheduled Waste Store and Pesticide Store, it was found that the warehouse were equipped with working fire hydrant (Mill), validated fire extinguisher (all fire extinguisher inspected had valid date of inspection), important contact number and flowchart of emergency, First aid Kit at strategic locations (contents were inspected to be complete as per checklist, medicine expiry date still valid,) emergency water bath and eye wash at chemical and pesticide mixing area in working condition. Furthermore, based on interview with respective worker, it could be concluded that the worker was able to explain and demonstrate steps of precaution on incidence, such as first aid action to be taken, spills handling and reporting.

Sg. Senarut Estate

Sighted new application for "Permohonan untuk Membaharui Perakuan Pendaftaran" for Puan Rosliza Ghazali the MA at the Sg Senarut estate clinic.

Similarly, the MA at Bukit Pilah estate also had her certification renewed. Sighted the "Borang 4 – (Peraturan 17 (1)) Permohonan untuk Membaharui Perakuan Pendaftaran" Attentioned to Medical Assistance Board at Puutrajaya. The application was made on the 17th Feb 2019.

- Recent incident on 17th February 2019 involving one Mukaddar Khan, on Sunday where he injured his foot while cutting fruit at 3.00 pm. Form JKKP 6 - Laporan Kemalangan was filled and reported on 19/2/2019 to DOSH. Sick leave for 5 days.
- Medical Surveillance Executive Summary & Recommendation was sighted. Full report on the Medical Surveillance is still being prepared, Medical Surveillance was conducted on 19 workers on 13 & 14th February 2019 as per OSHA

1994 abnd USECHH 2000 Regulation. Workers selected were exposed too Soda Ash, Alum, Chloride of Lime/Canyon, Glyphosate, Kenlon, Eborbait. NO TOXIC LEVEL DETECTED.

4.7.6

Sg Senerut Estate

Sighted insurance guarantee No. MG195154 from RHB Insurance Berhad dated 20/09/18 to Jabatan Imigresen Negeri Selangor. List of names of 24 foreign workers attached. But only 15 are workers to Sg Senerut Estate.

Listed are the 15 Sg Senarut Estate foreign workers. :

No	Workers Name	Nationality
1.	Mashal	Indonesia
2.	Sadhukan Biswajit	India
3.	Mahsan	Indonesia
4.	Santra Bapan	India
5.	Mahsan	Indonesia
6.	Ghosh Subrata	India
7.	Suhirman	Indonesia
7.	Masnun	Indonesia
9.	Muhammad Najamuddin	Indonesia
10.	Singh Anil Kumar	India
11.	Mahyud Saepudin Amaq Kalsum	Indonesia
12.	Ramdan	Indonesia
13.	Supriyanto	Indonesia
14.	Jumahir	Indonesia
15.	Dedi	Indonesia

Also sighted MAPA Circular No. 47/2018 (Malayan Agricultural Producers Association). To Managers of Estates/Pam Oil Mills/Factories in Membership. Titled: SOCSO Employment Injury Scheme (Skim Bencana Kerja Perkeso – SBKP) for Foreign Workers. Which take effect on 1st January 2019. FWCS enforced under the Workmen’s Compensation Act 1952 by the Department of Labour will be taken over by SOCSO under the Employees’ Social Security Act 1969 which will cover the Employment Injury Scheme Only.

4.7.7

Sg.Senarut

Recent incident on 17th February 2019 involving one Mukaddar Khan, on Sunday where he injured his foot while cutting fruit at 3.00 pm. Form JKPP 6 - Laporan Kemalangan was filled and reported on 19/2/2019 to DOSH. Sick leave for 5 days.

Bkt Pilah Estate

LTI Board at office showing the latest incident was on the 11/04/209.

Latest incident – 11/04/2019

Number of Medical leave/ days = 1

Status: Comply

4.8

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

4.8.1

The company shows the document of Training Requirements for Operating Unit (Mill & Estate) period 2016/2017 which describes the training schedule of HIRAC training (September 2016), operational training (boiler operating, Harvesting, spraying & chemical handling), Environment & Safety Policy Training, First Aid Training, RSPO training, SCCS training, Fire drill and Scheduled Waste Management Training. The training was conducted for respective workers and subcontrators (FFB Transporter).

Bukit Pilah Estate.

Training Requirements For Operating Units Matrix sighted – 35 Trainings scheduled for 2019

Bkt Pilah Estate recent Training (record in training book)

No.	Subject	Designation	Date	Location	Mandore
1.	Training Spraying	Sprayer	10/12/2018	17B	Prem
2.	Manuring Field 2015A	Supervisor, SA, Mandore, Field worker	27/02/2019	15A	Mohd Hairi – Sr Assit
3.	HCV and RSPO	13 workers	12/03/2019	Muster Ground	Mohd Hairi – Sr Assist
4.	Policies Training	92 Workers (mix)	21/03/2019	Muster Ground	

4.8.2

The company shows evidence of training activities in accordance with the training program, among others **and** maintained list of workers that been trained for the mill operation that include:

- a. RISE @ work – train the manager workshop dated 23 april 2018 – location at SUA Betong Training center include 3 personnel – 1 Senior Manager and 2 staff.
- b. Shooting practices for auxiliary police attende by 3 personnel date 18th April 2018 at shooting range Bukit Tangkah Sime Darby.
- c. Integration of E lab and LIMS for POME Proficiency Testing (EFFTYEST) train – to provide training and roll out the system to the end users dated 23 April 2018 at R&D Carey Island attended by 2 staff and general workers.
- d. Training on social issues management – training on SOP performance monitoring of the D3 surfactant dosing – at executive staff and works at Merlimau training center attended by 1 person.
- e. Sighted that the D3 surfactant training on SOP and Monitoring dated 5th April 2018 at KKS Tennaram – training on SOPE and performance monitoring for the D3 surfactant attended by 5 Peoples.
- f. HACCP System Implementation – to equip them with sufficient knowledge and competency in Implementation of HACCP System at Sime Darby Plantation POM.
- g. Sighted the IPM training – dated 2nd May 2018 – [at field 04 Sg Sabaling Estate] 6 workers attended.
- h. Harvesting training at Field 04A – Sg Sabaling Estate: 28 April 2018, 10 peoples.
- i. Training on Sehari Bersama Perkeso, Majikan Prihatin dan Gender Committee: 26 April 2018 1030 am.
- j. RSPO refresher training- meeting room Sg Sabaling estet dated 20 April 2018 attended by 9 peoples.
- k. Manuring training for new workers – dated 17 April 2018: 730 am at Field 4 attended by 11 peoples.
- l. Triple washing training dated 9th Nov 2017 by competent training – mix chemical attended by 3 person Sprayer training – Mr Hong My Corp dated 8 November 2017 attended by 9 persons.

Based on interviews with workers at Mill and Estate, it was explained that workers had been trained in relation to operational activities, emergency responses, and waste handling to first aid training.

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 Environmental Aspect Impact and Environmental impact Evaluation are available and updated accordingly. EAI evaluation

is complete covering the whole estate activities. Sighted the EIE for Sg. Muar Estate EIE form 2019 for all activities sighted. Prepared by Munirah Majid, Checked by MSAB, Approved by SMFSA. Dated 25/01/2019.

Noted reference to Management review for EAI and EIE 2018/2019 on **28 July 2018**.

1. The legal ref was wrongly made to EQA clean air Regulation, where estate is NOT APPLICABLE.
2. EQA SW Reg 2005 instead of EQA SW Reg 1978

Nonetheless, in the Sime Darby Plantation Bhd, Muar Rive Estate – upstream Malaysia – LORR (Legal & Other Requirements Register EQ (Clean Air)Regulation 2014 was registered as complied with all the requirements. GSQM **Updated Dec 2018. Thus there was inconsistent with the compliance to Clean Air legal reference.-OFI**

Also sighted was the EAI SOU 16 – Muar River Estate FY 2019. Prepared by Munirah Majid, Checked by MSAB, Approved by SMFSA. Dated 28/01/2019. 29/01/2019 and 30/01/2019

EAI at the Kok Foh POM filed in the EAI Identification File. The document is reviewed annually. Latest review was done on 18.03.2019 by Sr Mgr Abd Halim, Md Khairi Ab Kudus(Sr Asistant)

In the EAI form 15 Stations were identified.

- i) Store Cleaning : aspect , discharge to land , air emission – impact on land contamination
- ii) Dispatch of good – impacts discharge to land , fuel consumption - environmental load item (chemical and lubricant) impact on land contamination and business impact
- iii) Receiving of goods : aspect discharge to land and fuel consumption – chemical and lubricant , - impact to land contamination and business impact,
- iv) Waste and storage disposal -aspect spillage and leaking – item gear box oil , hydraulic oil , electrical, lead acid batteries – impact on land contamination

5.1.2

The Environmental Management Plan is developed by Identifying the Aspect & Impact of all activities in the Mill and Estates. Negative impacts are mitigated by preparing the action plan to be taken. Main impacts such as water pollution, air pollution and schedule wastes are the on-going actions taken at Sungai Senarut Estate, Muar River Estate and Bukit Pilah Estate, mitigation against negative impacts identified in EAI report was done through Environmental Management Plan (EMP). Review of the EAI was done by the management annually. Latet review for Kok Fof POM was 18/03/2019 and Bukit Pilah Estate 11/03/2019.

The EMP Year 2019 for Sungai Senarut Estate is tabulated by laying out the Aspects : Management Plan (Water Management, HCV, Energy Management, Replanting Activity, Waste Management, Workshop, Spraying activity and Workers housing Complex) → Objectives (waste: Proper disposal of waste in accordance to SOP and legal requirements)→Category (Domestic waste, Industrial waste, Scheduled waste, Recyclable Waste)→Types/location (used oil, clinical waste etc)→Actions (maintain inventory, labelling, online inventory e-swiss etc)→Frequency (Monthly, weekly, when needed etc.). The EMP were similar for Muar River estate and Bukit Pilah Estate.

Sighted the appointed person that will be in charged to mitigate the environmental impact, as for example schedule waste management - to ensure the Scheduled Waste disposed of before 180 days or 20 tons weight whichever comes first as per Environmental Quality Act requirement. Impact registered was evaluated, suitable mitigation of impact measures implemented with time frame included. Sighted the evaluation form of company and the company had done the evaluation matrix including criteria, weightage, operating condition (normal, Abnormal, Emergency) and the criteria had been divided into frequency , extent of impact , duration of impact and cost remedial action.

5.1.3

Sg. Senarut Estate

In the Environmental Management Plan, each plan contains the Objectives, Category, Types/Location, Actions, Frequency, PIC, and Monitoring Period. For example for HCV/Biodiversity – To promote awareness on HCV – Policy concerning management an protection of the environment according to the applicable law – Actions: Muster briefing to include HCV related (policy & legal compliance of capture, harm, collect or kill RTE species) Frequency of action: Quarterly. PIC- Assistant Manager.

Bkt Pilah Estate

In the Environmental Management Plan, each plan contains the Objectives, Category, Types/Location, Actions, Frequency, PIC, and Monitoring Period. For example for HCV/Biodiversity – To promote awareness on HCV – Policy

concerning management and protection of the environment according to the applicable law – Actions: Muster briefing to include HCV related (policy & legal compliance of capture, harm, collect or kill RTE species) Frequency of action: Quarterly, PIC- Assistant Manager

Status: Comply

5.2

The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced

5.2.1

The Certificate Holder has conducted HCV assessment which was carried out in 2008 and re-assessment in 2016 by the PSQM Department. There are two ALS certified assessors: Nur Aida Abdul Ghani (ALS2015-19) and Nursyamini Saifullizam (ALS2015-104) and accordance with HCV toolkit year of 2013. The report describes that total of 25.60 ha of HCV area identified in SOU 16 Kok Foh which only comprises HCV 4.1 and there was no RTE species was identified.

5.2.2

There was no rare, threatened or endangered (RTE) species was identified. Sg Senarut EMP, Management plan for HCV → Objectives (To promote awareness on HCV, To identify how tasks relating to HCV/biodiversity are to be performed and competencies required, to manage human wildlife conflict, to maintain/enhance the biodiversity in the estates) → Category (Policy concerning management and protection of the environment according to applicable law) → Actions (Muster briefing to include HCV related policy & legal compliance of capture, harm, collect or kill RTE species, Competencies/awareness training on how to manage HCV at estates by Wildlife department or PSQM or related agencies, Warning signage prohibiting illegal activities such hunting, fishing, cutting of protected flora, To identify conservation set aside areas) → Frequency (Monthly, weekly, Annually, when needed etc.). The EMP were similar for Muar River estate and Bukit Pilah Estate.

Common Wildlife found at SOU-16

No.	Common Name	Conservation Status	
		IUCN	WCA 2010
Birds			
1.	White-throated king fisher	LC – Least Concern	Totally protected wildlife
2.	Common Myna	LC – Least Concern	Not listed
3.	Crested serpent eagle	LC – Least Concern	Totally protected wildlife
4.	Barn owl	LC – Least Concern	Totally protected wildlife
5.	Red jungle fowls	LC – Least Concern	Protected wildlife (Hunted species)
6.	Intermediate egret	LC – Least Concern	Totally protected wildlife
7.	Lesser whistling duck	LC – Least Concern	Totally protected wildlife
Mammals			
1.	Wild boar	LC – Least Concern	Protected wildlife (Hunted species)
2.	Long-tailed macaque	LC – Least Concern	Protected wildlife (Other)
2.	Leopard cat	LC – Least Concern	Totally protected wildlife
3.	Common palm civet	LC – Least Concern	Protected wildlife (Hunted species)
4.	Malay civet	LC – Least Concern	Protected wildlife (Hunted species)
Reptiles			
1.	Common cobra	LC – Least Concern	Protected wildlife (Other)
2.	Monitor lizard	LC – Least Concern	Protected wildlife (Other)
Insects			
	Butterflies		
	Dragonflies		
	Moths		

	Beetles
<p>5.2.3 The Sime Darby Plantation has Saving the Orang Utan Policy & Environment Biodiversity Policy (Signed by Managing Director on January 2015). The company was socialization and installed sign board for prohibition for illegal activities (hunting, fishing, burning) and chemical used surround of water catchment area and river buffer zone. Based on stakeholder consultation with the workers and related stakeholder (local contractor) surround plantation area that know there was no indication of any capture, harm, collect or kill these species by the workers.</p> <p>5.2.4 There was no RTE identified only was identified of water catchment and river riparian reserves covering 25.60 Ha. The company has management Plan for HCV monitoring in related estate. There was showed the management plan year of 2018/2019. Based on field visit in HVC, there was showed that the signboard and prohibition sign of swim and fishing. The area surrounded was covered by natural vegetation and prohibition marking (red color) was put on oil palm plant as sign to no agrochemical application on river buffer zone area.</p> <p>HCV for the Sg. Muar Estate is maintained with an Action plan whre the scope is Water Catchment (GPS coordinate N2° 36' 46.95" E102° 43' 58.65" – OP 93T). The objective of the plan is sighting the awareness signage. The resources currently not in use and maintain for contingency/critical situation, observered forest tree planted around. The programme is to ensure the signage is maintain at site. In addition, there is also document for monitoring of HCV for 2019. The monitoring observations were: Encroachment/sign of Trespassing was available, signage of prohibition of illegal activities such as fishing and hunting was available and lastly the monitoring signs of erosion and pollution at the area.</p> <p>5.2.5 There was no found HCV set-asides in identification process was done on 2008 & re-assessment 2016 in SOU 16 Kok Foh. There was only identified HCV 4.1 as water catchment area and river riparian reserves totally of 25.60 ha.</p>	
Status: Comply	
<p>5.3 Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p>	
<p>5.3.1 Sg. Muar Estate Inventory of Scheduled Waste – SW 409 with various sizes 20L, 500g/L, 15L Basta, 5L Bayfalon, mostly chemical for estate use, sighted.</p> <p>Kok Foh POM Waste Mangement Action Plan 2018/2019 sighted Three types of waste category identified 1. Scheduled Waste →SW Code →Item Description→Location→Action to be taken → PIC 2. Domestic Waste→Item Description→Location→Action to be taken → PIC 3. Industrial Waste→Item Description→Location→Action to be taken → PIC Mill SW Storage was visited during audit:PIC Ms Mega keeper of the keys was trained and able to conduct task. Record and inventory at the storage was inspectd and in good order. Licence waste contractor was engaged. For Example Hiap Huat Chemical Sdn Bhd. A copy of their licence No. 000281 from DOE to handle and store SW. Jenis Leses: Kemudaha Pemerolehan Kembai Luar Tapak Buangan Terjadual</p> <p>5.3.2 Chemical store well ventilated, and separated as per Sime Darby SOP and Scheduled waste store made available at the estate, made according to the regulation of DOE and SOP of Sime Darby Storage Area bund constructed. Sighted at the scheduled waste storage at the mill –</p>	

1. Kok Foh POM Bin Card SW322 I PA (31/3/2019 - Nil), SW324 Used Hexane (Nil), SW 409 Contaminated Drum (10/1/2019 -256 issues disposed to Kualiti Alam, Current qty Nil)
2. Also sighted the Consignment Note for Scheduled Waste raised by Cenviro Recycling and Recovery Sdn Bhd (CN No 070488-R03) for Contaminated Containers SW409 for 8 pellets dated 10/1/2019.

Also visited during field visit the storage of scrap metal due to be dispose of. This will be sold as scrap and generate income to the mill. Scheduled waste and chemical storage were properly contained with secondary containment system bund and drainage sump. They are also equipped with spill kit and PPE to handle emergency.

Based on the record sighted that the waste had been disposed according to national best practices and Sime Darby SOP and operation procedure.

5.3.3

Sighted the waste management and disposal plan for year 2018/2019: including the type of waste, item description, location, action to be taken and person in charge. The documented scheduled waste has been disposed of properly. Sighted the scheduled waste location and action taken by the management as per regulation. Rubbish on domestic waste has been made properly managed: line site, Mill, office, Mill plant. The company had a proper waste management disposal plan and scheduled including:

- Provide adequate dustbin at mill and linesite, establish collection / landfill Sop
- Establish Collection Schedule
- Create awareness on hygiene amongst employees
- Regular monitoring cleanliness and hygiene

To handle the domestic waste, the site had managed the procedure according to the company SOP of segregation:

- i) Type of waste
- ii) SW code : SW 102
- iii) Item description – spent hydraulic oil
- iv) Location – workshop
- v) Action to be taken → collect and record amount of relevant scheduled waste
- vi) Person in charge → Mohana Kesavan
- vii) Time frame → 20th December 2017 – every 6 month

The waste management plan has been verified and review on FY 2018/2019 related pollution prevention management plan:

Include the pollution source → specific concern → means of mitigation → means of monitoring and action plan and person in charge.

Source of pollution → workshop / linesite / housing / chemical store / genset diesel store/ effluent / emission

Sighted the means of mitigation (waste management) through the method of :

e.g ; containment via bunds and proper flooring , disposal as scheduled waste → site inspection by executives and staff regulary

e.g : proper waste management system →site inspection

Water pollution → anaerobic pond for effluent treatment before discharge to waterways → to send water sampling every month for water quality monitoring.

Status: Comply

5.4

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

5.4.1

The company had developed a plan to improve fossil fuel efficiency including usage of fiber as fossil fuel in the boiler, for mill operation.

Company implemented fossil fuel reducing plan by renewable (fiber and shell) energy usage. Certificate holder has assess and estimated the direct energy use such as fuel usages and electricity generated by Mill operational activities for 2018 periods. The biogas feasibility studies had not been carried out however the composting plant had been installed and

using the POME spray method for 45 days before its converted into compost fertilizers.

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 and 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. Sime Darby Berhad is committed towards zero burning during replanting and land clearing and this was stated in their company website at www.simedarbyplantation.com/sustainability/practices-key-initiatives/zero-burning-replanting-technique. There are also signages around Kok Foh estate linesite, stating that open burning is not allowed. Field visit in estate show there is no evidence of open burning being conducted in Sungai Senarut Estate, Muar River Esatet and Bukit Pilah estate for land clearing or other purposes.

Status: Comply

5.6
Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.

5.6.1
 Sime Darby Plantations Kok Foh mill had an analysis of aspect impact assessment from the activity and record the mitigation plan from the impact for the mill, e.g.: dust emission, 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 and smoke from prime mover.

5.6.2
 Sighted a document of plan to reduce the ‘Green House Gas’ for year 2019. There is a document listed down the activities in all those estate that contribute to greenhouse 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	%
CPO	1.38	OER	19.98
PK	1.38	KER	5.02

Land Use	ha
OP planted area	17413.87
OP Planted on peat	0.00
Conservation (forested)	0.00

Conservation (non-forested)	0.00
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Summary of Field Emissions and Sinks

Plantation / field emissions and sinks	Own			Group			3rd P		
	Description	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB	tCO ₂ e	tCO ₂ e/ha
Emission Source									
Land Conversion	68182.83	9.81	0.46	1900.97	9.71	0.36	0	0	
CO ₂ Emissions from Fertiliser	9411.85	1.36	0.06	315.09	1.64	0.06	0	0	
N ₂ O Emissions	7354.53	1.05	0.05	184.94	0.94	0.04	0	0	
Fuel Consumption	748.98	0.11	0	25.48	0.12	0	0	0	
Peat Oxidation	0	0	0	0	0	0	0	0	
Sinks									
Crop Sequestration	-64206.11	-9.23	-0.43	-1837.94	-9.36	-0.35	0	0	
Sequestration in Conservation Area	0	0	0	0	0	0	0	0	
Total	21492.08	3.09	0.14	588.54	3.04	0.11	5502.11	0	

Summary of Mill Emissions and Credits

	tCO ₂ e	tCO ₂ e/tFFB
Emissions		0.2
POME	37487.98	0
Fuel consumption	49.9	-
Grid Electricity Utilisation	666.76	0.00
Credits	0.00	0.00
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total		

Palm oil Mill Effluent (POME) Treatment

Divert to compost	39 %
Divert to anaerobic digestion	61 %

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 %

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
SIA was conducted for the whole SOU 16 which involved 9 operating units. SIA conducted on 1st – 13th February 2016 by Sustainability Strategy Unit, PSQM Department. The objective of the assessments are:

- To identify the existing social issues in the study area
- To develop social management plan for respective study area that is agreed by both PSQM Department and Operating unit management

Focusing in SOU 16 Kok FOH, this SIA reports focus on live hoods. The improvements of social wellbeing of the wider community should be explicitly recognized, and as such should be an indicator considered by any form of assessment. In

summary, some of the most important aspect of social impacts not the physical impacts of human population, but the meaning, perceptions, or social significance of these changes.

6.1.2

Documents verifications obtained informations that SIA has been done with the participations of affected parties. The coping exercise was done based on the available stakeholder data which includes:

- Identification of stakeholder
- Developments of SIA methodology during pre-assessment
- For stakeholders, interview method will be used.

For field interview sampling of members form workers, local communities and smallholders was done randomly.

Interview technique include

- Group interview
- One – on one interviews

6.1.3

Issues raised in SIA report were mitigated by action plan. Methodology and targeted dateline were set to review the effectiveness. Based on the social impact assessment conducted, the management had come several actions plans to mitigate and reduce the impacts to our employees, neighbors, suppliers, contractors and other stakeholders. They key findings and area of concerns together stated as bellows

- Living conditions/living improvements
- Local communities

6.1.4

The unit certifications has a managements plans on Social Impacts assessment FY 2019 to mitigate and reduce the impact to employees, neighbors, suppliers, contractors and other stakeholders.

6.1.5

There is no smallholders scheme under SOU 16

	Status: Comply	
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6.2

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

6.2.1

Communication with local community was done through SIA stakeholder meeting, RSPO stakeholder meeting, Internal Estate communication and external community communication. Result of interviewed with stakeholders, generally expressed their satisfaction with SOU 16 management team.

6.2.2

The manager of the estate is the responsible person to communicate the related information with external stakeholder upon request of the information. While communication with the internal stakeholders of each estate and mill will be handled by the assistant managers.

Socialization and communication done routinely to the stakeholder, as confirmed during the public consultation to community leader, women's communities, local contractors, and village officials. During the external stakeholder engagement by audit team, such as Community Leader from Kg. Bakar (Muar River Estate) has declared the Sg. Senarut Estate and Muar River Estate its known that the stakeholders have understood the mechanism and PIC of communication and consultation to the company

6.2.3

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

Status: Comply

6.3

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

6.3.1

The sampled sites have appointed assistants who are fully responsible to communicate with affected party and escalate to their authorities or to PSQM. Internally this procedure communicated through morning master call and through stake holder meeting for external parties. Sighted the logbook for electricity repair that complaint by workers and action taken details by the estate management. External logbook that seen with various requests from local Tamil School, nearby residential estate representative and Village Head that adequately responded and records are maintained. Interview with worker's representative and local school teacher, revealed there is no complaints and grievances nor disputes between the certificate holder and stakeholders.

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 a flow chart titled dated 01/11/08 "Sustainable Plantation Management System" - for internal [Appendix 5.5.3.1] and external [Appendix 5.5.3.2] established for communicating and reporting of EMS, OHS and social issues with relevant stakeholders. There is also a "Whistleblowing Policy" (GPA No. B5) dated 27/02/14 are made available for handling stakeholder's social issues. Interview with workers and staff resulted with their understanding on the complaint flow.

6.3.2

There are evidences available on various complaints and request in regards to house maintenance been registered in the log book with supporting letters from the requesters sighted corresponding to the log book. There are no outstanding issues by either party.

Status: Comply

6.4

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

6.4.1

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

6.4.2

Compensation for loss of legal, customary or user rights is not applicable as the land been long developed by Golden Group of companies before acquired by Sime Darby. This estate is surrounded by independent smallholders, villages, and government reserve land. Interview with external stakeholders resulted with no evidence of any compensation for loss of legal, customary or user rights.

6.4.3

The whole SOU 16 has never encountered conflict with surrounding local communities. There is no compensation record available. Meeting with School, NUPW and Villages depicted a positive relation.

Status: Comply

6.5

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

6.5.1

The workers database and personal details are being maintained well at sampled sites. During field visit, through interview and documentation verification, there is no evidence that workers been violated in monthly wages and the [National Wages Consultative Council Act 2011 [Act 732] – Minimum Wage Order Amendment 2018 [RM 1100] implemented since Jan' 19. The foreign workers will be entitled for Socso payment by Jan 2020 which after the expiry of Foreign Workers Compensation Scheme [FWCS] / Skim Pampasan Pekerja Asing [SPPA]. There is no contract worker employed by either mill or estates. Sighted the contract agreement of foreign and local workers that has clear statement on pay, fringe benefits, salary slips, medical surveillance etc. As per the MAPA agreement [Appdx - Article 19], the foreign workers are eligible for ALP [Annual Leave Pay] providing they fulfill the criteria.

6.5.2

There are no changes made in the content of contract agreement. Cross verified the latest contract letters which has no changes in the clause of pay and conditions of employment. Seen the contract prepared in [Bahasa Indonesia, Hindi and English] understood by the workers and signed by both the authorised signatory of the company and employee. The estate is complying to minimum Wage Order Amendment 2018 [RM 1100.00] effective from 01/01/2019. Payslip randomly verified and there is no trace of breach of payment as stipulated in their contract. Interview with workers shows no serious issue on wages received but sometimes there do happens typo error or miscalculation on working hours / days which corrected or reimbursed timely by the respective management. However, there was an observation noted on the adequacy of the content in the agreement letter as some sampled letters with lapses on dates, worker's signature and thub prints.

6.5.3

Site visit to workers quarters seen the housekeeping, basic amenities were provided accordingly and interview with workers revealed the estate has good commitment towards the workers needs. The clinic in estate seen with sufficient facilities to treat patient with minor illness and for major case it will be refer to local government hospital either in Panel Clinic or Government Hospital. Interview with workers, resulted positive feedbacks of the service from clinic. There are government Tamil primary schools available within the company's compound. The workers of estate have option for their children's education as they also accessible to town schools. The Kok Foh mill and estate shares the common facilities such as recreational places, religious building, community hall, clinic, sundry shop, food stall, electricity, and water. Interview both local and foreign workers whom claimed 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. In general, the foreign workers are preferred to be located within their religious believes workers. Interview with workers, revealed the management ensure workers have adequate beds, kitchen and toilet facility.

6.5.4

The workers are allowed to purchase their needs during weekend rest at nearest township. There are some mini marts and sundry shop within 3km radius of the sampled estates and mill that do provides the daily needs. Visit to the worker' quarters, evidenced the estate management provided basic cooking utilities such as cooking gas, stove and a kitchen. Interview with workers resulted with satisfactory feedback and the housekeeping of worker's quarters well maintained. The Medical Assistant, been assigned and responsible for weekly line site inspection that was cross verified against visiting logbook. There is also a line site mapping available indicating on assembly point, fire extinguishers, clinic and religious places.

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

There are no changes in the policy identified and workers interviewed that they are aware on the policy where the estate and mill management not restricting the workers from joining the Union. The Union meeting seen incorporated with OSH meeting and the recent meeting minutes were verified. Interview general workers at field agreed that they are encourage by the estate and mill management to join Workers Union. However, some of the workers feels there is no issue to escalate as their rights and needs being taken care. Among the common issues discussed were on line site cleanness, road

maintenance and reduction in overtime. Tele-conference call with Union Leader, whom has good command of the Union engagement and agreed the estate management always has positive supports towards the member's request.

6.6.2

The Union meeting seen incorporated with OSH meeting and the recent meeting minutes attached with an attendance list seen with mixtures of local and foreign workers who have participated and contributed their feedbacks. Interviewed mill workers are aware of the committee and informations are given where and when needed. Interview with Indonesian workers at mill and estates, revealed they have been approached and informed by the estate management on the Indonesian Presidential Election that to be held on 17/04/2019 in Indonesia and how the workers could cast their votes here in estate and mill.

Status: Comply

6.7

Children are not employed or exploited.

6.7.1

Based on field visit, stakeholder interview and workers database seen with no evidence of child labour. The SAP system also been designed such, it will omit any worker registration if the age calculation is below than 18 years old. Verified the "List of Workers by nationality & Joining Date" against estate manpower distribution list, found no workers fall below 18 years old.

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

The senior workers interview during field visit and staff in the office, has no history of discrimination and aware on the availability of social policy. Interviewed with mill workers [operation male workers and female staff at office], found no evidence of any form of workplace discrimination based on race, caste, national origin, religion etc. The estate workers both local and foreigners seen comfortable with the way of the estate operates the business.

6.8.2

The workers interview, has no history of discrimination and aware on the availability of social policy. Verified the complaint and grievance book against the interview evidences with both local and foreign workers, revealed no issues relating to discrimination. Interview of new and old workers [foreigners and locals] equally feels the estate management being honest and not imposed any sort of discrimination nor being ignorance of their request and/or feedbacks.

6.8.3

Interviewed of the newly arrived workers [less than 8 months – communication via a translator for workers from India] are aware on the term of discrimination and how they to respond if such incidents happen to them. Sampled a promotion letter for staff who was promoted from General Clerk to Clerk Level III. Interview of new and old workers [foreigners and locals] equally feels the estate management do promote based on skills, capabilities, qualities, and medical fitness necessary for the job. No records of violation in the implemented policy.

Status: Comply

6.9

There is no harassment or abuse in the work place, and reproductive rights are protected.

6.9.1

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 / mill manager and Chairwoman] found satisfactory progress and functioning in maintaining harmonies work and living environment. The mill and estate was able to produced a policy related to Gender Policy stated that the company shall comply: "endeavor to prevent sexual harassment and all other forms of violence

against women, workers and community” and “establish a specific complaints and grievance procedure and mechanism, acceptable by all parties, to address gender-based issues” by establishing the gender committee to implement and monitor the policy.

6.9.2

The is no changes in the existing policy [as stipulated in Social Policy] and interview with female mill and estate workers as well the gender committee chairman of both facilities revealed, the female workers understood their reproductive rights. Seen training records for Sustainability Policies briefed to all workers. The effectiveness of training was verified through interview with office female staff who attended the gender committee meeting. The awareness found satisfactory.

6.9.3

The manual on implementation of the gender policy that provides guidelines to the specific components which includes understanding and recognition of rights and background of an issue, details and specific complaints and grievance procedure to address issues within gender and guidelines on the roles and responsibilities of management in supporting the initiatives and activities of the gender committee. No records found on any form of harassment towards workers. There is letter of appointment to all committees that outlined the roles & responsibilities that includes of investigation and/or briefing the mechanism of lodging a complaint.

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 2019, categorized in three grade (A, B & C). The FFB price was put in the front window of the weight bridge room. The Kok Foh POM received outside FFB from outside crop plantation consist of 6 FFB suppliers. There was no smallholders scheme under SoU 16 Kok Foh, 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 vehicle and the operator should using properly PPE).

6.10.3

There was observed of document contract between Kok Foh POM and Eng Huat Latex Concentrate SDN BHD and Felcra Bernhard (FFB Supplier) . 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 the workers' insurance of contractor operator (workers) was responsible by the contractor. 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.

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. The local contractor was informed that the payment process was well implemented. There was observed payment record to contractor on February 2019 in Kok Foh POM, Sg. Sabaling Estate and Pertang Estate. Those documents consist of invoice, contract form (description of work, quantity, price per unit, tax and total payment), work completion certificate and payment advice (payment receipt). Payment has been made timely according to the contract.

Status: Comply

6.11

Growers and millers contribute to local sustainable development wherever appropriate.

6.11.1

Both Mill and estates in SOU 16 have record of CSR. Schools which located within the estates benefit the most. Others

event such as festival and sport are regularly hold with surrounding communities, for example

- Donation to local community (cost of electricity for March 2019 TNB Scholl
- Donation for Sepak Takraw Tournament to Balai Polis Rompin on 18 March 2018
- Donation program keceriaan Bengkel SMK Bahau on 20 March 2018

6.11.2

Smallholders productivity did not related to estates. However there are OCPs that contribute FFB to Kok Foh Mill. Improving productivity is indirectly through FFB grading.

Status: Comply

6.12

No forms of forced or trafficked labour are used.

6.12.1

Based on the interview with internal & external stakeholders evidenced of no force labour in which for the process of recruiting foreign workers, it fully manages by Workers Management Unit at Sua Betong at where the new workers brief "Induction Training" by the respective translators. Estate and mill management maintaining the "Passport Save Keeping" acknowledgment letter that mutually agreed and signed by both parties. Based on the contract agreement, if either party wants to terminate the employment service before their contract expires, it follows to the clause 18 of employment contract. The mill and estate management allow their workers from leaving their housing facilities outside working hours with having valid reasons and a copy of passport and "Surat Jalan" will be provided. Sampled verified of passports of foreign workers against their contract agreement and found no discrepancies.

6.12.2

Based on the interview session with estate and mill workers and managers, the contract substitution is not applicable. The workers from India who are supposed to work in rubber plantation are understand that any estate which has dual crop where their workers to work on both field if required such as slashing, spraying, manuring.

6.12.3

There is no specific policy available for temporary or foreign/migrant workers, however the "Social Policy" consisted the statement of the non-discriminatory practices. Recruiting foreign workers fully manages by Workers Management Unit at Sua Betong at where the new workers brief on "Induction Training" by the respective translators. The training inclusive of OHS, environment, company policies, rules, and work ethics

Status: Comply

6.13

Growers and millers respect human rights

6.13.1

There is a Group Policy in English and Malay titled as "Social Policy" dated on Jan 2015. The content of policy includes of their principle of not condone forced labour or child labour, promotes the process of identifying and consulting potential social benefits to enhance mutual benefits of stakeholders, the company does not restrict personnel to form and join trade union of their choice, all employees be treated fairly regarding job employment, race, gender, caste, religion, etc.

Sighted also the Social and Humanity Management Policy that the company will protect the sense of humanity while ensuring that they are socially beneficial and do not infringe on basic human rights. By means recognizing the rights of their employees, protects their children and etc. During annual training session on company policies, the mill and estate managers with assistant from PSQM briefed the workers on the content and training records seen effectively maintained. Interview with field and mill workers in the sampled sites has resulted with positive feedbacks that labour policies well understood by them

6.13.2

Not applicable. The sampled estates and mill have no foreign labour with the dependents lives with them. There are Government aided Tamil Schools within estate premises and interview with school Teachers revealed 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.		
7.1.1; 7.1.2 and 7.1.3 SOU-16 Kok Foh has established since 1996 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-16. 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.		
7.2.1 and 7.2.2 SOU-16 Kok Foh has established since 1996 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-16. 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 and 7.3.5 SOU-16 Kok Foh has established since 1996 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-16. Hence, this requirement is not applicable.		
	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-16 Kok Foh has established since 1996 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-16. 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 The development of SOU 16 did not involve local people land. Thus no dispute was recorded thus far.		
	Status: Comply	
7.6		
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for		

<p>any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.</p>		
<p>7.6.1; 7.6.2; 7.6.3; 7.6.4; 7.6.5 and 7.6.6 There no compensation paid to local that are related to land acquisition. Sime Darby has a procedure in tackling land dispute issue but not the one that related to FPIC principles. Generally Sime Darby will follow government requirements or instruction.</p>		
	<p>Status: Comply</p>	
<p>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.</p>		
<p>7.7.1 and 7.7.2 SOU-16 Kok Foh has established since 1996 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-16. Hence, this requirement is not applicable.</p>		
	<p>Status: Comply</p>	
<p>7.8 New plantation developments are designed to minimise net greenhouse gas emissions.</p>		
<p>7.8.1 and 7.8.2 SOU-16 Kok Foh has established since 1996 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-16. Hence, this requirement is not applicable.</p>		
	<p>Status: Comply</p>	
<p>PRINCIPLE #8 Commitment to continuous improvement in key areas of activity</p>		
<p>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.</p>		
<p>The company can show the evidence of continuous improvement in key area activity, for example:</p> <p>Internal Audit for Plantation & Mill</p> <ul style="list-style-type: none"> The Company has procedures to monitor the operational activities in the estates and mills through the implementation of internal audit conducted according to SOP of Internal Audit. Implementation of internal audit conducted every semester by Mill Advisor and Plantation Advisor. <p>Environmental</p> <ul style="list-style-type: none"> Objectives and targets established at mill. Relevant management action plan observed on yearly basis. Sufficient programs in place and responsibility defined. Monitoring on management action plan performed and in good progress. Waste management plan defined for overall estate's activities. GHG emission reduction plan established. <p>Worker Welfare</p> <ul style="list-style-type: none"> Work agreement for foreign worker in mother language (ie for worker from Indonesia in Bahasa, I Bengali) <p>RSPO Internal Audit RSPO Internal audit conducted annually. RSPO Internal audit covered all aspect in RSPO P&C as follows legal aspect, social aspect, best management practices, OHS and worker welfare.</p> <p>The management unit has continuous improvement program and records, such as:</p> <ul style="list-style-type: none"> Paraquat usage reducing program. 		

<ul style="list-style-type: none">- Barn owl boxes added on each estates- Beneficial plant on each estates- Zero burning campaign.- Foreigner training program- Harvesting control for optimum production, etc		
	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>SOU16 Kok Foh POM is Palm Oil Mill where legally under management of Sime Darby Plantation Bhd, and has been registered of certified products of RSPO (CSPO and CSPK) with e-trace- UTZ, Member ID: RSPO_PO1000000296. The main product from this mill is CPO and Palm Kernel and the CPO placed in storage tank at the same location.</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>Kok Foh Palm Oil Mill are FFB processing mill and produced CPO and Palm kernel. Kok Foh Palm Oil Mill applied Mass Balance supply chain model because the mill receive and process all FFB's from certified and uncertified sources.</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 parent company of Kok Foh POM are Sime Darby Sdn Bhd member of the RSPO since 08 September 2004 with registration number 1-0008-04-000-00</p> <p>Kok Foh POM are RSPO certified Mill with Certificate Number No MUTU- RSPO/093 and also has been registered with member ID RSPO IT Platform member registration number Member id : RSPO_PO1000000296 and License id :CB70517</p>
	Status: Comply
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>Kok Foh POM did not have any processing aids at site</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>Kok Foh Palm Oil Mill applied Mass Balance supply chain model because the mill receive and process all FFB's from certified and uncertified sources.</p>
	Status: Comply

5.2.2	
The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	
Kok Foh Palm Oil Mill applied Mass Balance supply chain model because the mill receive and process all FFB's from certified and uncertified sources.	
	Status: Comply
5.3	Documented procedures
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>Procedure related SCCS presented in documents Standard Operating Procedure for Sustainable Supply Chain and Traceability (SOP No. 2, issued on February 2018). The objective of that's procedure is</p> <ol style="list-style-type: none"> To provide guidelines for estate and palm oil mills to establish and ensure effective implementations on sustainable supply chain and traceability of certified sustainable materials (FFB; CPO and PK) To ensure that the production and claims of certified sustainable materials adhere to the relevant sustainability certification system, RSPO SCCS, <p>Document verification its known if the procedure has been covering all provisions following:</p> <ul style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). The person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements are Head of unit <p>Based on an field visit observation and interview with staff in weighbridge and grading area/loading ramp that indicated the personal in charge was understood the mechanism to handle of supply chain system.</p>	
	Status: Comply
5.3.2	
The site shall have a written procedure to conduct annual internal audit	
<p>Procedure of internal audit is presented in document Standard Operating Procedure for Sustainable Supply Chain and Traceability (SOP No. 2, issued on February 2018) clausal 17.0 The specific statement within the procedure as follow:</p> <ul style="list-style-type: none"> Annual internal audit shall be conducted in accordance to internal audit procedure (SD/SDP/PSQM/IAP) to determine whether the mill conforms to the requirements in the RSP SCCS and the markets communications and claims documents and effectively implements and maintains the standards requirements Mill shall maintain the internal audit records and reports The outcome of the internal audit and all action taken to correct non conformities shall be subject to managements review at least annually. <p>SSCS internal audit conducted on 4th – 8th March and results of internal audit its known if there is no findings or no non-conformity identified related to supply chain management system</p>	
	Status: Comply
5.4	Purchasing and goods in
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	
Kok Foh Mill do not buy any RSPO certified products (CSPO and CSPK) from outsource or traders. And during 2018 until March 2019 there is no certified product (CPO and PK) under RSPO scheme.	

	Status: Comply
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents
	<p>Mechanism for handling non-conforming oil palm product presented in Standard Operating Procedure for Sustainable Supply Chain and Traceability (SOP No. 2, issued on February 2018) clausal 10 about Non-conforming Products and/or Document that described</p> <ul style="list-style-type: none"> • Where there is contamination of RSPO is certified material during receiving, processing, storage and dispatch, the mill/estate shall downgrade the materials following downgrade order: RSPO Identity Preserve → Mass Balance → Non Certified. • The volume of downgraded material shall be recorded accordingly • Mill shall inform GTM accordingly if the downgrade affects the delivery timeline to the customer • Overselling of products shall be treated as non – conforming product. PSQM and GTM shall be notified and investigation that initiated by mill immediately. • For material received with in sufficient information for verification, or any error in incoming documents shall be treated as non – conforming documents.
	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.
	Documents verifications, interview with managements obtained information if Kok Foh POM did not cooperation with another outsources or independent third parties
	Status: Comply
5.5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:
	<ol 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
	Documents verifications, interview with managements obtained information if Kok Foh POM did not cooperation with another outsources or independent third parties
	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.
	Documents verifications, interview with managements obtained information if Kok Foh POM not cooperation with another outsources or independent third parties for the processing or physical handling of RSPO
	Status: Comply

5.5.4	<p>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>Documents verifications, interview with managements obtained information if Kok Foh POM not cooperation with another outsources or independent third parties for the processing or physical handling of RSPO</p>	
<p>Status: Comply</p>	
5.6	<p>Sales and goods out</p>
5.6.1	<p>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>Documents verifications, interview with managements and verify to palm trace its known if during 2018 until March 2019 there is no certified product (CPO and PK) under RSPO scheme.</p>	
<p>Status: Comply</p>	
5.7	<p>Registration of transactions</p>
5.7.1	<p>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 parent company of Kok Foh POM are Sime Darby Sdn Bhd member of the RSPO since 08 September 2004 with registration number 1-0008-04-000-00</p>	
<p>Kok Foh POM are RSPO certified Mill with Certificate Number No MUTU- RSPO/093 and and also has been registered with member ID RSPO IT Platform member registration number Member id : RSPO_PO1000000296 and License id :CB70517</p>	
<p>Status: Comply</p>	
5.7.2	<p>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.
<p>Kok Foh POM are RSPO certified Mill with Certificate Number No MUTU- RSPO/093 and and also has been registered with member ID RSPO IT Platform member registration number Member id : RSPO_PO1000000296 and License id :CB70517. Documents verifications, interview with managements and verify to palm trace its known if during 2018 until March 2019 there is no certified product (CPO and PK) under RSPO scheme.</p>	
<p>Documentation for the Sustainable product (CPO and PK), consist of: FFB dispatch record, which further will be counted the daily production of the Sustainable PK, daily production record, which classified as the Sustainable product, monthly recapitulation of the Sustainable product, stock record, which has been reconciled with the FFB acceptance record, monthly</p>	

sale production and annual recapitulation.
 Documents verifications its known if the selling of CSPO other scheme or conventional scheme not yet removed from RSPO IT Platform, and it's become Observation that the company shall evaluation related to the time order of remove stock on Palm trace of CSPO and CSPK products sold in other schemes or conventional. Based on minutes of meeting PSQM with Global Trading Marketing 25th April 2018 mentioned if the removal is to be done at the end of the silenced period for each mill by GTM.

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

Based documents review and interview with the managements representative its known if the training plan on RSPO SCC requirements conducted annually once a year. The training program scheduled on March 2019 and that's has been conducted.

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

Training to personnel of estates who involved in the SCCS implementation was conducted on 13 March 2019 related to RSPO SCC Model, the use of CSPO logo in FFB delivery document, mass balance records etc. The number of participants are 12 persons

Based on interviews with weighbridge officer, it is known that key persons in SCCS activities have understood the procedures and can demonstrate how documented FFB, CPO, PK are certified and not certified.

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

Kok Foh Palm Oil Mill has maintain accurate, complete and up-to-date for the FFB receives, process and CPO & PK production from its supply bases. Within this record, the certificate holders maintain the FFB's sources based on monthly bases.

Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Apr-18	13,066.27	2,820.15	15,886.42
May-18	15,228.83	3,814.60	19,043.43
Jun-18	10,573.28	3,640.27	14,213.55
Jul-18	8,099.72	3,207.39	11,307.11
Aug-18	8,315.12	2,291.42	10,606.54
Sep-18	9,368.08	1,477.19	10,845.27
Oct-18	10,700.64	1,544.17	12,244.81
Nov-18	12,993.70	2,297.61	15,291.31

Dec-18	14,007.74	4,343.37	18,351.11
Jan-19	14,394.91	6,374.86	20,769.77
Feb-19	13,810.12	6,849.76	20,659.88
Mar-19	14,455.39	5,710.24	20,165.63
Total	145,013.80	44,371.03	189,384.83

Furthermore, Kok Mill has record and balance of all RSPO CSPO and CSPK, non-certified products produced, as well as its dispatch on a monthly and three monthly basis, presented in the Table belows:

CPO production and Dispatch for Kok Foh Mill

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)		
	Cert	Non Cert		RSPO	Other scheme	Non Cert
Opening Stock	3,935.26					
April 2018	3,236.67	698.58	3,935.26			3,972.87
May-18	3,025.69	757.89	3,783.58			3,210.78
Jun-18	2,076.46	714.90	2,791.37			2,117.97
Jul-18	1,597.49	632.59	2,230.08		-	1,865.21
Aug-18	1,665.94	459.09	2,125.03		-	2,110.13
Sep-18	1,846.07	291.09	2,137.16		-	1,218.14
Oct-18	2,118.56	305.72	2,424.28		-	674.76
Nov-18	2,789.67	493.28	3,282.95		-	1,976.51
Dec-18	2,942.07	912.24	3,854.31		-	3,363.04
Jan-19	2,976.59	1,318.20	4,294.78		-	2,792.25
Feb-19	2,840.50	1,408.88	4,249.38		-	4,865.20
Mar-19	2,735.52	1,356.82	4,092.34			3,442.18
Total	33,786.48	9,349.29	39,200.51		-	31,609.04

PK production and Dispatch for Kok Foh Mill

Period	PK production (MT)		Total	Cert PK Dispatch (MT)		
	Cert	Non Cert		RSPO	Other scheme	Non Cert
Opening Stock	396.14	-	-	-	-	-
Apr-18	696.09	150.24	846.33	-	-	500.48
May-18	749.66	187.78	937.44	-	-	806.23
Jun-18	502.02	172.84	674.87	-	-	618.72
Jul-18	369.04	146.14	515.18	-	-	420.02
Aug-18	455.02	125.39	580.41	-	-	529.14
Sep-18	509.40	80.32	589.72	-	-	458.83
Oct-18	538.56	77.72	616.28	-	-	545.90

Nov-18	616.90	109.08	725.99	-	-	591.93
Dec-18	690.31	214.04	904.36	-	-	742.20
Jan-19	783.22	346.85	1130.08	-	-	263.40
Feb-19	755.01	374.48	1129.50	-	-	368.71
Mar-19	907.37	130.94	1038.31	-	-	1221.15
Total	7,968.76	2,115.84	9,688.46	-	-	7,066.71

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

Based on the Standard Operating Procedure for Sustainable Supply Chain and Traceability (SOP No. 2, issued on February 2018) explained that:

- 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.

Based on document verification, the management unit can shown all recording data for two years ago. Such as: contract document, FFB Consignment, CPO and PK Ticket, etc.

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.

Kok Foh Palm Oil Mill as Certificate Holder did not purchased CPO and/or PK from any sources. This Mill only receives FFB's from Certified area, and uncertified outgrowers. The estimate volume of sustainable CPO and PK are recorded in the Annex of certificate.

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

Kok Foh POM only received and processed of FFB's as material input. This mill did not purchase CPO and/or PK from others. Therefore, this mill did not using conversion factors.

Status: Comply

5.10.2

Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.

Kok Foh POM only received and processed of FFB's as material input. This mill did not purchase CPO and/or PK from others. Therefore, this mill did not using conversion factors.

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.
	All certified product claims, the CH never using RSPO symbol, trademarks or logos.
	Status: Comply
5.12	Complaints
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.
	Kok Foh 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
	The management review (<i>Internal Review</i>) was done annually per year. Last managements review conducted on 8 March 2019.
	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.
	Result of Management Review report on 08 March 2019 the following information was discussed: <ol style="list-style-type: none"> 1. Matters arising <ul style="list-style-type: none"> • A follow up action from previous managements review 2. Review on status /issue of input and output <ul style="list-style-type: none"> o Review the process performance and product conformity based on agreed target parameters o Decisions and actions on process improvement, meeting customers' requirements and resources needed. 3. Sustainability managements <p>Asses on effectiveness opportunities for improvement and changes need related to:</p> <ul style="list-style-type: none"> • Objectives / managements program • Resources evaluation need and plan • Results from system audit • Customers / stakeholders feedback/complaints • Closing loop of all nonconformity corrective and preventive actions 4. Changes that could affect the management system. <ul style="list-style-type: none"> • Change in input / resources and/or process that can affect RSPO/SCCS/MSPO

5. Recommendations for improvement. Ideas for continuous improvement in system product quality and /or stakeholders complaint handling	
	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. 	
Improvement of the effectiveness of the management system and its processes and resource needs is already included within the Management Review.	
	Status: Comply

3.2.2 (Module E) CPO Mills - Mass Balance Requirements

Clause	(Module E) CPO Mills - Mass Balance Requirements												
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 volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p> <p>Kok Foh Mill applied Mass Balance supply chain model because the mill receive and process all FFB's from certified and uncertified sources.</p>												
	Status: Comply												
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. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.</p> <p>Estimates of CPO and PK produced by Kok Foh Mill obtained from the data of 12 months before the audit activities and have been described in this this report</p> <table border="1"> <thead> <tr> <th>Pass Annual Claim Certified Product</th> <th>Previous Certificate Claim Start date to end date (MT) 07 July 2018 – 06 July 2019</th> <th>Estimates of CPO and PK produced Start date to end date (MT) 07 July 2019 – 06 July 2020</th> </tr> </thead> <tbody> <tr> <td>FFB Process</td> <td>177,781</td> <td>154.071</td> </tr> <tr> <td>CPO Production</td> <td>37,334</td> <td>32,355</td> </tr> <tr> <td>PK Production</td> <td>8,889</td> <td>8,089</td> </tr> </tbody> </table>	Pass Annual Claim Certified Product	Previous Certificate Claim Start date to end date (MT) 07 July 2018 – 06 July 2019	Estimates of CPO and PK produced Start date to end date (MT) 07 July 2019 – 06 July 2020	FFB Process	177,781	154.071	CPO Production	37,334	32,355	PK Production	8,889	8,089
Pass Annual Claim Certified Product	Previous Certificate Claim Start date to end date (MT) 07 July 2018 – 06 July 2019	Estimates of CPO and PK produced Start date to end date (MT) 07 July 2019 – 06 July 2020											
FFB Process	177,781	154.071											
CPO Production	37,334	32,355											
PK Production	8,889	8,089											
	Status: Comply												
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 or book and claim).</p> <p>The parent company of Kok Foh POM are Sime Darby Sdn Bhd member of the RSPO since 08 September 2004 with registration number 1-0008-04-000-00</p> <p>Kok Foh POM are RSPO certified Mill with Certificate Number No MUTU- RSPO/093 and and also has been registered with member ID RSPO IT Platform member registration number Member id : RSPO_PO1000000296 and License id :CB70517</p> <p>Documents verifications, interview with managements and verify to palm trace its known if during 2018 until March 2019 there is no certified product (CPO and PK) under RSPO scheme.</p>												

	Status: Comply
E.3	Documented procedures
<p>E.3.1</p> <p>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:</p> <ol style="list-style-type: none"> 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. <p>Procedure related SCCS presented in documents Standard Operating Procedure for Sustainable Supply Chain and Traceability (SOP No. 2, issued on February 2018). The objective of that's procedure is</p> <ol style="list-style-type: none"> To provide guidelines for estate and palm oil mills to establish and ensure effective implementations on sustainable supply chain and traceability of certified sustainable materials (FFB; CPO and PK) To ensure that the production and claims of certified sustainable materials adhere to the relevant sustainability certification system, RSPO SCCS, <p>Document verification its known if the procedure has been covering all provisions following:</p> <ul style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). The person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements are Head of unit <p>Based on an field visit observation and interview with staff in weighbridge and grading area/loading ramp that indicated the personal in charge was understood the mechanism to handle of supply chain system.</p>	
	Status: Comply
<p>E.3.2</p> <p>The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p> <p>Procedures for receiving and processing certified and non-certified FFBs. presented in SOP For Sustainable Supply Chain and Traceability Clausal 7.0 About Receiving FFB at the Mill, who described</p> <ol style="list-style-type: none"> Mill shall receive from determined supplying estate as per Appendix 15C: List of Supply Base and Crop Diversion for SOUs Mill shall maintain the list of certified FFB Suppliers (With RSPO, MSPO and / or ISCC Certificate Number and Validity period) at the premise. This also applies to certificate third party FFB suppliers Upon receiving FFBs, mill shall consider: <ul style="list-style-type: none"> RSPO (IP) only allowed to receive RSPO Certified FFBs RSPO (MB) allowed to receive from both (RSPO certified and non-RSPO certified) Mill shall maintain records of volume and non-certified material <p>During field observation, this person is able to demonstrate awareness of the procedures, including separation of certified and uncertified sources material (FFB's). While, the Administration Head is understand and aware for updating an internal Mass Balance Report.</p>	
	Status: Comply
E.4	Purchasing and goods in
<p>E.4.1</p> <p>The site shall verify and document the volumes of certified and non-certified FFBs received.</p>	

Kok Foh POM has provide an update of monthly summary of RSPO FFB certified and non-certified from its supply base and external sources, with recapitulation presented as follows:

Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Apr-18	13,066.27	2,820.15	15,886.42
May-18	15,228.83	3,814.60	19,043.43
Jun-18	10,573.28	3,640.27	14,213.55
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Feb-19	13,810.12	6,849.76	20,659.88
Mar-19	14,455.39	5,710.24	20,165.63
Total	145,013.80	44,371.03	189,384.83

Status: Comply

E.4.2

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

Based on Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability stated that management unit will inform to Certification Body if there is an over-production than the projected production.

The results of interviews with representatives of the management unit indicates that the management unit has been understood about the procedures for providing information if there is excess production of RSPO-certified products. Document review showed that the production of RSPO certified products do not exceed the estimated production in the RSPO certificate attachment of ASA-3

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 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.

The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)

Kok Foh Palm Oil Mill has record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified product (CPO and PK) on a three-monthly basis as describe on table below.

CPO production and Dispatch for Kok Foh Mill

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)		
	Cert	Non Cert		RSPO	Other scheme	Non Cert

Opening Stock	3,935.26					
April 2018	3,236.67	698.58	3,935.26			3,972.87
May-18	3,025.69	757.89	3,783.58			3,210.78
Jun-18	2,076.46	714.90	2,791.37			2,117.97
Jul-18	1,597.49	632.59	2,230.08		-	1,865.21
Aug-18	1,665.94	459.09	2,125.03		-	2,110.13
Sep-18	1,846.07	291.09	2,137.16		-	1,218.14
Oct-18	2,118.56	305.72	2,424.28		-	674.76
Nov-18	2,789.67	493.28	3,282.95		-	1,976.51
Dec-18	2,942.07	912.24	3,854.31		-	3,363.04
Jan-19	2,976.59	1,318.20	4,294.78		-	2,792.25
Feb-19	2,840.50	1,408.88	4,249.38		-	4,865.20
Mar-19	2,735.52	1,356.82	4,092.34			3,442.18
Total	33,786.48	9,349.29	39,200.51		-	31,609.04

PK production and Dispatch for Kok Foh Mill

Period	PK production (MT)		Total	Cert PK Dispatch (MT)		
	Cert	Non Cert		RSPO	Other scheme	Non Cert
Opening Stock	396.14	-	-	-	-	-
Apr-18	696.09	150.24	846.33	-	-	500.48
May-18	749.66	187.78	937.44	-	-	806.23
Jun-18	502.02	172.84	674.87	-	-	618.72
Jul-18	369.04	146.14	515.18	-	-	420.02
Aug-18	455.02	125.39	580.41	-	-	529.14
Sep-18	509.40	80.32	589.72	-	-	458.83
Oct-18	538.56	77.72	616.28	-	-	545.90
Nov-18	616.90	109.08	725.99	-	-	591.93
Dec-18	690.31	214.04	904.36	-	-	742.20
Jan-19	783.22	346.85	1130.08	-	-	263.40
Feb-19	755.01	374.48	1129.50	-	-	368.71
Mar-19	907.37	130.94	1038.31	-	-	1221.15
Total	7,968.76	2,115.84	9,688.46	-	-	7,066.71

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	Kok Foh POM – SOU16 does not use the RSPO trademark both in the on-product and off-product.	✓
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of Logo Use	X or ✓
ASA-1.3	Kok Foh POM – SOU16 does not use the RSPO trademark both in the on-product and off-product.	✓
	Status: Comply	
3.	Implementation of Certificate and trademark is not used on product	X or ✓
ASA-1.3	Kok Foh POM – SOU16 does not use the RSPO trademark both in the on-product and off-product.	✓
	Status: Comply	
4.	Controlling of Certificate and trademark, including withdrawing inappropriate logo.	X or ✓
ASA-1.3	Kok Foh POM – SOU16 does not use the RSPO trademark both in the on-product and off-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). 	<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>

	<ul style="list-style-type: none"> Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>Auditor Verification: 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 correspondence with RSPO Remediation and Compensation.</p>
i.	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<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.
ii.	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>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

		<ul style="list-style-type: none"> PT Bina Sains Cemerlang, this issue was raised on 22 April 2017 and is still being processed 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 Assessment

NCR No.	: 2018.01	Issued by	: Mohamad Amarullah
Date Issued	: 18 May 2018	Time Limit	: 16 July 2018
NC Grade	: Major	Date of Closing	: 02 July 2018
Standard Ref. & Requirement	<p>4.7.3 All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p>		
<p>Non-Conformance Description & Evidence observed <i>(filled by auditor)</i> Based on observation to Station Thresher, Press and Kernel in Kok Foh POM, it was found that the operators do not wear earplug. Furthermore, based on review towards PPE delivery record, it was informed that some workers interviewed has received earplug more than six months ago. This is not in accordance with the HIRARC.</p>			
<p>Root Cause Analysis <i>(filled by organization audited):</i></p> <p>1. There is no mechanism of inspection which aims to assure that all workers shall wear PPE provided by Mill management. There is no mechanism towards PPE condition (life service).</p>			
<p>Corrective Action <i>(filled by organization audited):</i></p> <p>1. PPE inspection will be carried out every shift at toolbox briefing to ensure all PPE complete prior to mill stations. PPE issuance record will be reviewed in quarterly safety meeting as one of its compulsory agenda.</p>			
<p>Correction <i>(filled by organization audited):</i></p> <p>Mill management will review the PPE issuance record and those employee who requires his PPE to be replaced will be receive their PPR as requested.</p>			
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i></p> <p>Verification 25 June 2018 Mill management shows evidence of PPE checking and delivery for 12 workers of Shift 31 and 13 Workers of Shift 32 on My 25th 2018. Among PPE checked and given are ear plug and vest. However, estate management is required to explain the mechanism if the respective workers/operators were not in accordance towards PPE usage as instructed by their Superior and mechanism to make sure that all PPE used were in appropriate condition. Hence, this NCR is remain open.</p> <p>Verification 28 June 2018 Mill management describes that root of cause were due to mechanism of PPE checking and monitoring are not available. It was mentioned in the previous verification that PPE checking and monitoring had starts to be implemented. However, document of the respective mechanism which approved by management representative is not available. Hence the status of NCR is still open.</p> <p>Verification 02 July 2018 Mill management shows Memorandum of Kok Foh Mill Manager dated May 15th 2018 about compulsory on PPE Usage in working place. The document has mentioned mechanism as explained in verification dated 28 June 2018.</p>			

Hence, based on description on root of cause, corrective action and correction evidence given, it could be concluded that NCR No. 2018.01 is stated **closed**.

Verified by : Mohamad Amarullah

NCR No.	: 2018.02	Issued by	: Mohamad Amarullah
Date Issued	: 18 May 2018	Time Limit	: ASA-1.3
NC Grade	: Minor	Date of Closing	: 29 June 2018
Standard Ref. & Requirement	: 4.7.6 All workers shall be provided with medical care, and covered by accident insurance.		
Non-Conformance Description & Evidence observed <i>(filled by auditor)</i>			
Based on review towards RHB Insurance payment on 135 foreign workers record in Sungai Sabaling Estate, it was noted that evidence insurance payment for 39 workers was not available during the audit.			
Root Cause Analysis <i>(filled by organization audited):</i>			
The renewal process for Foreign Worker Insurance Scheme (FWIS) is carried out along with yearly permit renewal process. This way it is can be assured that both the renewal is carried out concurrently. This process involved Workers Management Unit (WMU) of Head Quarter to update the status of the renewal process. Nonetheless the PIC has not done their follow up with HQ on this.			
Corrective Action <i>(filled by organization audited):</i>			
Estate management has liaised with WMU pertaining on the renewal of insurance policy.			
Correction <i>(filled by organization audited):</i>			
The Chief Clerk to follow up with WMU on the Foreign Workers Coverage Scheme for all Sg Sabaling workers.			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>			
Verification 25 June 2018 Estate management has explain a proper corrective action. However, evidence such as progress of insurance payment, appointment letter for PIC, etc. are not showed yet. Hence, this NCR is remain open .			
Verification 28 June 2018 Estate management shows data of 39 workers which noted during audit. The data informed ID/Employee Number, Full name, date joined, nationality, Work Permit Expiry date, date of arrival to Malaysia, year, period of cover and Policy Number. As per date of data given, it was known that insurance for 32 workers has already extended until February to May 2019. However, information towards insurance payment for the rest 7 workers (4 Indian and 3 Indonesian) were still not available. Hence the NCR is still open .			
Verification 29 June 2018 The company shows Appointment Letter from Sabaling Estate Manager for Chief Clerk, as PIC for Foreign workers matter, dated June 12 th 2018. Regarding insurance payment, the management mentioned that the 4 Indian workers has repatriated while for 3 Indonesia workers, the last policy is from 16/05/2017 to 15/05/2018. The renewed policy is as attached in BAE17-E, Refer to No. 14, 24 and 28 for workers namely Herman, Marsoan and Nasruddin, respectively.			

Hence, it could be concluded that all foreign workers has fully covered by estate management.

Based on description on root cause analysis, corrective action and correction evidence given, the NCR No. 2018.02 is stated **closed**.

Verified by : Mohamad Amarullah

3.5.2 Identification of Findings, Corrective Actions and Observations at 1.3

<i>NCR No.</i>	:		<i>Issued by</i>	:	
<i>Date Issued</i>	:		<i>Time Limit</i>	:	
<i>NC Grade</i>	:		<i>Date of Closing</i>	:	
<i>Standard Ref. & Requirement</i>	:				
<i>Non-Conformance Description & Evidence observed (filled by auditor):</i> There is no NC Finding During Assessment					
<i>Root Cause Analysis (filled by organization audited):</i>					
<i>Correction (filled by organization audited):</i>					
<i>Corrective Action (filled by organization audited):</i>					
<i>Assessor Evaluation and Conclusion (filled by auditor):</i>					
<i>Verified by</i>	:				

3.5.3 Opportunity for Improvement

No	Ref. Std.	Description
1	5.1.1	Management review on EAI and EIE document in July 2018 with legal reference corrected to Environmental Quality (Clean Air) as not applicable to estate operations. Nonetheless, the LORR updated by GSQM in Dec 2018 as compliance to all requirement in EQ (Clean Air) 2014
2	4.4.1	Awareness of pesticide mixing operator regarding environmental impact.
3	6.1.4	The company has an opportunity to attach evidence of public consultation with affected stakeholders' results on SIA managements plan
4	6.5.2	There found lapses of dates and worker's acknowledgement in the foreign worker's "Letter of Employment" which unable to define the validity period of the agreement.
5.7.2	SCCS COC 5.7.2	Evaluation related to the time order of remove stock on Palm trace of CSPO and CSPK products sold in other schemes or conventional

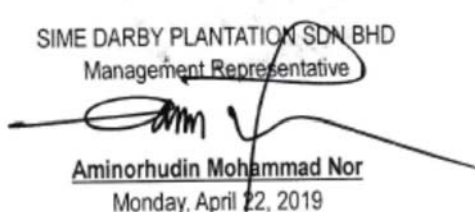

3.5.4 Noteworthy Positive Components

No	Ref Std	Descriptions
1		Good commitment from management
2		Has been certified MSPO (GGCSDP001-MSPO-00-2018 for estate and GGCSDP002-MSPO-00-2018 for mill)
3		The mill area is clean & well manage.
4		Good documentation system.
5		The understanding of interviewed workers on sustainability policies are good.
6		Workers line-site management, basic facilities and signage are good.

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

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>Contractors of Vehicle Servicing [Muar River Estate]</p> <p>His wokers are Malaysians and has no issues with estate workers in dealing with day to day work. The estate management regularly brief on the sustainability issues.</p>	<p>Indicator 1.3, 6.10.3 & 6.10.4 the company has provided opportunities to several local contractors surround of plantation area</p>
<p>Contractors of FFB Transportation [Muar River and Sg. Senarut Estate]</p> <p>In Muar River Estate,</p> <ul style="list-style-type: none"> An unused tractor by contractor was sold by estate without getting a concern from the contractor. <p>In Muar River Estate and Sg. Senarut Estate,</p> <ul style="list-style-type: none"> The estate often switching the location of collection bins that without prior information, As for the last trip in a day, if possible estate to load FFB onto bin and not to wait for the lorry driver as it may night visual disturbance, The platform bins need maintenance by the estate The FFB filling onto the collection bins to be uniform [8MT / 9MT / 10MT]. <p>In the POM,</p> <ul style="list-style-type: none"> During lunch breaktime there is no PIC to operate the weighbridge that causes delay in their next trip, There are 2 weighbridges in POM but only 1 is in-use, The mill receiving of FFB timing uncertain. 	<p>Indicator 1.3, 6.10.3 & 6.10.4 the company has provided opportunities to several local contractors surround of plantation area</p>
<p>Contractors of Vehicle [JCB/Shovel/Backhoe] [Muar River and Sg. Senarut Estate]</p> <ul style="list-style-type: none"> Sometimes the payment delays due to the processing factors at HQ level. However, the estate management informed the contractors prior to the due dates. The estate road maintenance needs to be further improved as too many pit holes and at certain areas the fronds are protruding out and may have risk of winscreen crack. 	<p>Indicator 1.3, 6.10.3 & 6.10.4 the company has provided opportunities to several local contractors surround of plantation area</p>
<p>Foreign workers [Sg. Senarut, Bukit Pilah, POM]</p> <p>No wokers descriminations, monthly wages being paid before 4th of every month, living quarters are at good, contract details</p>	<p>It has been verify on indicator 6.5, 6.7, 6.8, 6.12 and 6.13</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
and actual practice are monitored and the workers feel comfortable working.	
<p>Workers Union Representative [Bukit Pilah Estate]</p> <p>Tele-conversation with Union Leader who has given all positive feedbacks and appreciate the estate [Bukit Pilah] management for strong support.</p>	It has been verify on indicator 6.6
<p>Local FFB Supplier (Cheong Wing Chan Sdn Bhd and Felcra Sdn Bhd)</p> <p>The discussion was conducted by Interview method. The main points of discussion:</p> <ul style="list-style-type: none"> • Cooperation with the SOU 16 Kok Foh has been started since 1982 • At the time of starting in cooperation with SOU 16 Kok Foh there is a contract signed by both of parties and each keeps the document • The period of contract is one year and will renew every year • Timely payment in accordance with clauses describes in the document contract that is at the end of each month and can be taken through Bank account. • The mill staff was explained the criteria and standard for FFB from outsider crop and will grading by the mill staff and evaluate • There is any evaluation by the SOU 16 Kok Foh to all of local contractor (quarterly meeting) 	<p>Indicator 6.10.1 & 6.10.2, there was no smallholder scheme</p> <p>Indicator 6.10.3 & 6.10.4 the company has provided opportunities to several local contractors surround of plantation area</p>
<p>Local people from Kampung Bakar (Muar River Estate)</p> <p>Good cooperation and support from the estate. No issues related to estate operations.</p>	It has been verify on indicator 2.2 and 2.3
<p>Local Teacher of SJKT Sg. Senarut</p> <p>The semi-government funded school is always receiving good support and attention from the estate. No social issues from the foreign workers.</p>	It has been verify on indicator 6.11
There was no feed-back received from NGO and External Stakeholders.	No issues raised.

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>Signed on behalf of:</p> <p>Company Name</p> <p>SIME DARBY PLANTATION SDN BHD Management Representative</p>  <p><u>Aminorhudin Mohammad Nor</u> Monday, April 22, 2019</p> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Moh Arif Yusni</u> Monday, April 22, 2019</p>

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	Kok Foh POM: - 2 Sterilizer Station operators from Indonesia. - 1 Threshing Station Operator from Indonesia. - 1 Press Station Operator from Indonesia. - 1 Kernel Station Operator from Indonesia. - 3 Boiler Operators from local Malaysia.	Kok Foh Palm Oil Mill, 72109 Bahau, Negeri Sembilan.		Interview	10 April 2019	√	
2	Sungai Senarut Estate - 6 Harvesters from Indonesia. - 2 Harvester from India - 2 store keeper			Interview	08 April 2019	√	
3	Muar River Estate: - 4 harvester from Indonesia. - 8 EFB applicator from India - 3 sprayer from Bangladesh and 1 sprayer from India - 2 store keeper			Interview	09 April 2019	√	
4	Bukit Pilah Estate - 2 harvester from Indonesia - 1 harvester from Nepal - 1 Harvester from Bangladesh - 2 store keeper				11 April 2019	√	
4	Gender Committee Sungai Senarut Estate			Interview	08 April 2019	√	
5	Local Contractor in Muar River and Sungai Senarut			Interview	09 April 2019	√	
6	Local people from Kampung Bakar (Muar River Estate)			Interview	09 April 2019	√	
7	FFB Supplier (Cheong Wing Chan Sdn Bhd)			Interview	10 April 2019	√	
8	FFB Supplier (Felcra)			Interview	10 April 2019	√	
9	Representative worker from Indonesia			Interview	8 – 11 April 2019	√	
10	Representative worker from India			Interview	8 – 11 April 2019	√	
11	Representative worker from Bangladesh			Interview	8 – 11 April 2019	√	
12	Representative worker from Nepal			Interview	8 – 11 April 2019	√	
13	Contractors of Vehicle Servicing [Muar River Estate			Interview	09 April 2019	√	
14	Contractors of FFB Transportation [Muar River				08 April 2019	√	

	and Sg. Senarut Estate						
15	Contractors of Vehicle [JCB/Shovel/Backhoe] [Muar River and Sg. Senarut Estate]				08 April 2019	√	
16	Workers Union Representative [Bukit Pilah Estate]				08 April 2019	√	
17	Local Teacher of SJKT Sg. Senarut				08 April 2019	√	
18	Majlis Kebajikan dan Pembangunan Masyarakat Kebangsaan Malaysia	Malaysia	makpem@gmail.com	Questionnaire	08 April 2019		√
19	Pesticide Action Network Asia & Pacific	Malaysia	panap@panap.net	Questionnaire	08 April 2019		√
20	Environmental Protection Society	Malaysia	epsm@epsm.org.my	Questionnaire	08 April 2019		√

Appendix 2. Assessment Program

DATE	07 – 12 APRIL 2019	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Sunday, 07 April 2019		
08.00 - 11.00	Jakarta – Kuala Lumpur	• Moh Arif Yusni
11.00 – 16.00	Travelling from KL to Bahau, Negeri Sembilan	• All Auditor
Monday, 08 April 2019		
08.00 – 09.00	Opening Meeting in Sungai Senarut Estate <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
09.00 – 12.00	Document Audit and Field Visit to Sungai Senarut Estate <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) - Stakeholder consultation to affected communities surrounding the plantations, Worker Union, Gender Committee and Local Contractor 	All Auditor
12.00 – 14.00	Break and Lunch	
14.00 – 17.00	<ul style="list-style-type: none"> • Continue Field Observation and field observation clarification • Document review & Follow-up and Clarification of Field Observation\ 	All Auditor
Tuesday, 09 April 2019		
08.00 - 12.00	Document Audit and Field Visit to Muar River Estate Estate <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 	All Auditor

DATE	07 – 12 APRIL 2019	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) - Stakeholder consultation to affected communities surrounding the plantations, Worker Union, Gender Committee and Local Contractor	
12.00 – 14.00	BREAK	
14.00 – 17.00	<ul style="list-style-type: none"> Continue Field Observation and field observation clarification Document review & Follow-up and Clarification of Field Observation 	All Auditor
Wednesday, 10 April 2019		
08.00 - 12.00	Document Audit and Field visit to <u>Kok Foh POM</u> - 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	<ul style="list-style-type: none"> MAY MHS / KHA
12.00 – 14.00	BREAK	
14.00 – 17.00	<ul style="list-style-type: none"> Continue Field Observation and field observation clarification Document review & Follow-up and Clarification of Field Observation 	All Auditor
Thursday, 11 April 2019		
08.00 - 12.00	Document Audit and Field Visit to Bukit Pilah Estate - 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) - Stakeholder consultation to affected communities surrounding the plantations, Worker Union, Gender Committee and Local Contractor	All Auditor
12.00 – 14.00	BREAK	
14.00 – 16.00	<ul style="list-style-type: none"> Continue Field Observation and field observation clarification 	All Auditor
16.00 – 17.00	<ul style="list-style-type: none"> Document review & Follow-up and Clarification of Field Observation 	
Friday, 12 April 2019		

DATE	07 – 12 APRIL 2019	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 09.00	<ul style="list-style-type: none"> Internal discussion by auditor team preparing for Closing Meeting 	All Auditor
09.00 – 11.00	<ul style="list-style-type: none"> Closing Meeting <ul style="list-style-type: none"> - Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timeline of CAR's, Conclusion) - Comments, Responses and Questions 	
12.00 – 15.00	<ul style="list-style-type: none"> Travelling from Site to KL 	
17.00 -	Travelling From KL to Jakarta	Moh Arif Yusni