

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

**[ ✓ ] Surveillance 1.4**

Name of Management Organisation : Bukit Puteri Palm Oil Mill – SOU 10 subsidiary of Sime Darby Plantation Bhd  
 Plantation Name : Bukit Puteri Estate  
 Location : K/B31, Sungai Koyan, 27650 Raub, Pahang Darul Makmur, Malaysia.  
 Certificate Code : **MUTU-RSPO/91**  
 Date of Certificate Issue : 07 July 2016                      Date of License Issue : 29 Nov 2020  
 Date of Certificate Expiry : 06 July 2021                      Date of License Expiry : 06 July 2021

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA 1.4	17 to 19 September 2020	Mahaswaran Maliyapan (Lead Auditor); Mohd. Rizal bin Md. Kassim; Yap Chin Hung	Ardiansyah	Octo H.P.N. Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA 1.4	30 October 2020

**TABLE OF CONTENT****FIGURE**

Figure 1. Location Map of SOU 10 Bukit Puteri 02

Figure 2. Operational Map of SOU 10 Bukit Puteri Estate 03

Abbreviations Used 05

**1.0 SCOPE of the CERTIFICATION ASSESSMENT**

1.1 Assessment Standard Used 06

1.2 Organisation Information 06

1.3 Type of Assessment 06

1.4 Location of Mill and Plantations 06

1.5 Description of Area Statement 07

1.6 Planting Year and Cycles 08

1.7 Description of Mill and Supply Base 08

1.8 Estimate Tonnage of Certified Product 10

1.9 Other Certifications 10

1.10 Time-Bound Plan 11

**2.0 ASSESSMENT PROCESS**

2.1 Assessment Team 23

2.2 Assessment Methodology, Assessment Process and Locations of Assessment 23

2.3 Stakeholder Consultation and Stakeholders Contacted 24

2.4 Determining Next Assessment 25

**3.0 ASSESSMENT FINDINGS**

3.1 Summary of Assessment Report of the RSPO Certification 25

3.2 Conformity Checklist of Certificate and Logo Use 40

3.3 Summary of RSPO Partial Certification 41

3.4 Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components 44

3.5 Summary of Arising Issues from Public, Management and Auditor Responses 46

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

4.1 Formal Signing of Assessment Findings 48

**APPENDICES**

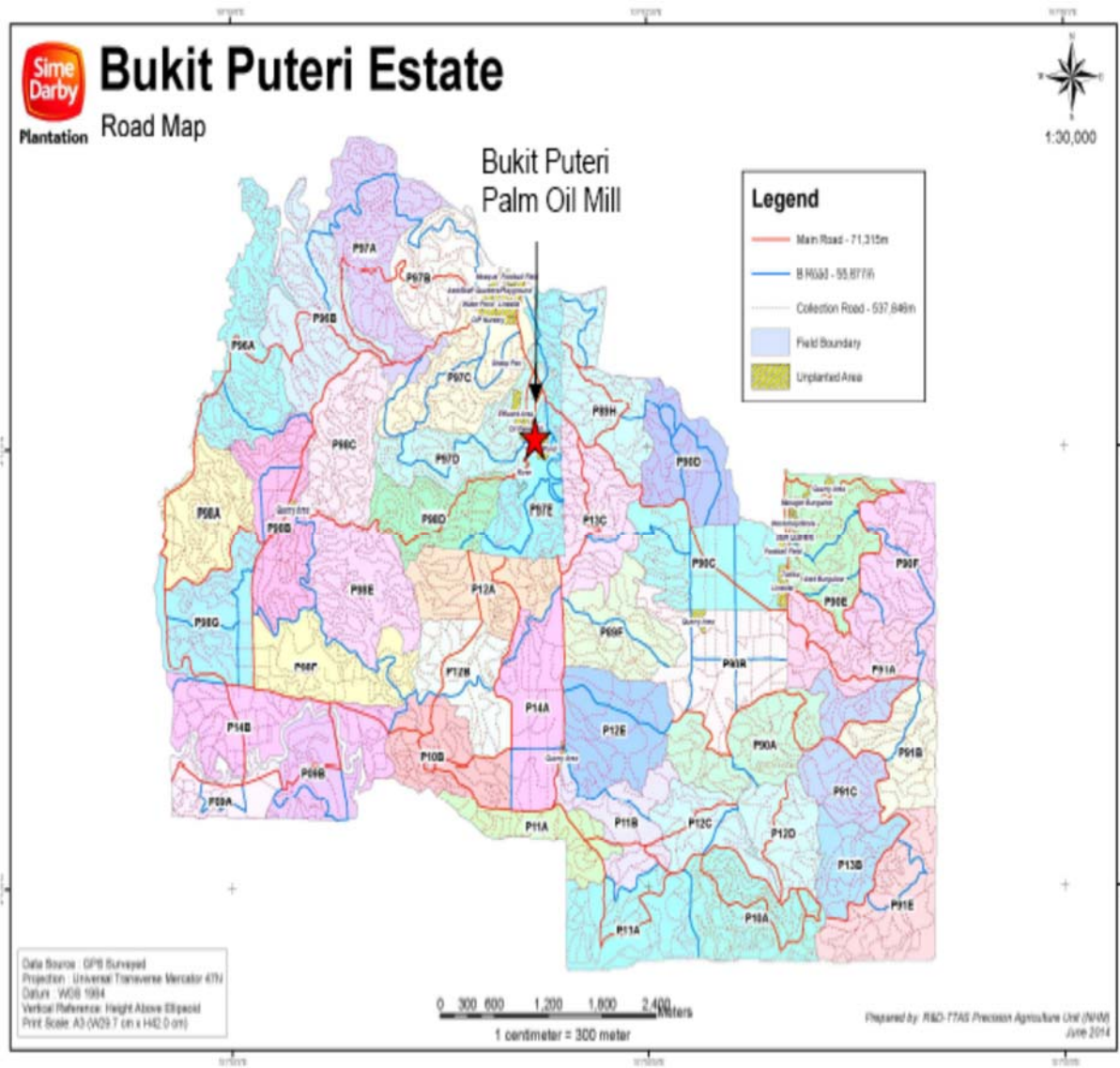
1. List of Stakeholders Contacted in the RSPO Certification Process 49

2. Assessment Program 50

Figure 1. Location Map of SOU – 10 Bukit Puteri



Figure 2. Operational Map of SOU – 10 Bukit Puteri Estate



Abbreviations Used

ARM	: Agriculture Reference Manual	LORR	: Legal and Other Requirement Register
ASA	: Annual Surveillance Assessment	MQMSSOM	: Mill Quality Management System Standard Operation Manual
BOB	: Barn Owl Box	MPLAN	: Management Plan
CEC	: Cation Exchange Capacity	MPOB	: Malaysian Palm Oil Board
CH	: Certificate Holder	MSDS	: Material Safety Data Sheet
CHRA	: Chemical Health Risk Assessment	MYNI	: Malaysia National Interpretation
CPI	: Continious Improvement Plan	NGO	: Non-Government Organization
COBC	: Code of Business Conduct	NUPW	: National Union Plantation Workers
CPO	: Crude Palm Oil	OCS	: Outside Crop Supplier
CSR	: Corporate Social Responsibility	OER	: Oil Extraction Rate
DID	: Department Interim Drainage	OSH	: Occupational Safety and Health
DOE	: Department of Environment	OT	: Over Time
DOSH	: Department of Safety and Health	P&D	: Pest(s) and Disease(s)
EFB	: Empty Fruit Bunch	PIC	: Person in Charge
EHS	: Environment Health and Safety	PK	: Palm Kernel
EMS	: Environmental Management System	PND	: Pest and Disease
EMP	: Environmental Management Program	POM	: Palm Oil Mill
EQT	: Environment Quality Act.	POME	: Palm Oil Mill Effluent
ERP	: Emergency Respond Plan	PPE	: Personal Protective Equipment(s)
ESH	: Environment Safety and Health	PSQM	: Plantation Sustainability and Quality Management
ETP	: Effluent Treatment Plant	PSS	: Pictorial Safety Standard
EVIT	: Each Vehicle Type	RSG	: Responsible Sourcing Guidelines
FFB	: Fresh Fruit Bunches	RSPO	: Roundtable Sustainable Palm Oil
FY	: Financial Year	RTE	: Rare, Threatened or Endangered
GCAD	: Group Corporate Audit Department	SAP	: System Application Product and Processing
GHG	: Greenhouse Gas	SCCS	: Supply Chain Certification Standard
GTM	: Global Trading and Marketing Department	SDP	: Sime Darby Plantation Bhd
HACCP	: Hazard Analysis Critical Control Point	SIA	: Social Impact Assessment
HCV	: High Conservation Value	SJKC	: <i>Sekolah Jenis Kebangsaan China</i>
HIRAC	: Hazard Identification Risk Assessment and Control	SKSP	: <i>Sekolah Kebangsaan Sri Puteri</i>
HIRARC	: Hazard Identification, Risk Assessment and Risk Control	SOP	: Standard Operating Procedure
HQ	: Head Quarter	SOU	: Strategic Operating Unit
IPM	: Integrated Pest Management	SPMS	: Sime Darby Plantation Management System
JBA	: <i>Jabatan Bekalan Air</i> (Water Supply Agency)	SW	: Scheduled Waste
JKKP	: <i>Jawatan Kuasa Kesihatan dan Keselamatan Pekerja</i> (OSH Committee)	USD	: United States Dollar
JTK	: <i>Jabatan Tenaga Kerja</i>	USECHH	: Use and Standard of Exposure of Chemicals Hazardous to Health
KDN	: <i>Kementerian Dalam Negeri</i>	WHO	: World Health Organization
KER	: Kernel Extraction Rate	WI	: Work Instruction
LCC	: Legume Cover Crop	WMU	: Workers Management Unit
LD	: Lethal Dosage	WTP	: Water Treatment Plant

<b>1.0</b>	<b>Scope of the Certification Assessment</b>		
<b>1.1</b>	<b>Assessment Standard Used</b>	<ul style="list-style-type: none"> <li>Malaysia National Interpretation (MYNI) of The RSPO Principles and Criteria for The Production of Sustainable Palm Oil 2018, Endorsed by the RSPO of Governors on 7<sup>th</sup> November 2019 (*Revised 17 July 2020 with insertion of additional guidance and reference for indicator 3.4.1)</li> <li>RSPO Certification System for Principles and Criteria, 14 June 2017</li> </ul>	
<b>1.2</b>	<b>Organization Information</b>		
1.2.1	Organization name listed in the certificate	Bukit Puteri POM – SOU 10 subsidiary of Sime Darby Plantation Berhad	
1.2.2	Contact person	Shylaja Devi Vasudevan Nair.	
1.2.3	Organisation address and site address	Sime Darby Plantation Berhad. Main Block, Level 3, Plantation Tower, No.2, Jalan PJU 1A/7. Ara Damansara. 47301, Petaling Jaya, Selangor. Malaysia.	
1.2.4	Telephone	+603 784 84366.	
1.2.5	Fax	+603 7848 4363.	
1.2.6	E-mail	<a href="mailto:shylaja.vasudevan@simedarbyplantation.com">shylaja.vasudevan@simedarbyplantation.com</a>	
1.2.7	Web page address	www.simedarbyplantation.com	
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 – 8 September 2004.	
<b>1.3</b>	<b>Type of Assessment</b>		
1.3.1	Scope of Assessment and Number of Management Unit	Bukit Puteri Palm Oil Mill and Bukit Puteri Estate.	
1.3.2	Type of certificate	Single	
<b>1.4</b>	<b>Locations of Mill and Plantation</b>		
1.4.1	Location of Mill		
	<b>Name of Mill</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	Bukit Puteri POM	K/B31, Sungai Koyan, 27650 Raub, Pahang Darul Makmur, Malaysia	N 04° 12' 09"      E 101° 51' 45"
1.4.2	Location of Certification Scope of Supply Base		
	<b>Name of Supply Base</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	Bukit Puteri Estate	K/B31, Sungai Koyan, 27650 Raub, Pahang Darul Makmur, Malaysia	N 04° 12' 40"      E 101° 51' 40"
<b>1.5</b>	<b>Description of Area Statement</b>		
1.5.1	Tenure		
	• State		3,875.80 Ha
	• Community		- Ha



1.5.2	<b>Area Statement</b>						
	• Total area						3,875.80 Ha
	• Planted Area						3,795.58 Ha
	- Mature area						2,934.92 Ha
	- Immature area						860.66 Ha
	• Mill						5.39 Ha
	• Emplishment						18.25 Ha
	• Nursery						8.57 Ha
	• Unplantable area						26.65 Ha
	• HCV						21.36 Ha
	<i>Remarks: The total matured area has an increase of 253.55 Ha and the immature area with 860.66 Ha. The total planted area calculated same as in ASA 1.3. Field visit and interviewed with Estate Manager found with no evidence of land extension nor new planting.</i>						
1.6	<b>Planting Year and Cycles</b>						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					Total (Ha)
		Bukit Puteri Estate					
	19-25 Years	1,040.31					1,040.31
	9-14 Years	415.64					415.64
	4-8 Years	1,478.97					1,478.97
	<b>Sub Total Mature</b>	<b>2,934.92</b>					<b>2,934.92</b>
	0-3 Years	860.66					860.66
	<b>Sub Total Immature</b>	<b>860.66</b>					<b>860.66</b>
	<b>TOTAL</b>	<b>3,795.58</b>					<b>3,795.58</b>
1.6.2	New Planting area after January 2010		0 Ha (Nil)				
1.6.3	Planting Cycle		3 <sup>rd</sup> Cycle				
1.7	<b>Description of Mill and Supply Base</b>						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Bukit Puteri POM	20	70,889.45	14,578.112	20.44	3,281.999	4.60
	<i>*Production data source from April 2019 to March 2020</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Bukit Puteri Estate	3,875.80	3,795.58	49,251.42	17.90	48,860.98	99.21
	<b>TOTAL</b>	<b>3,875.80</b>	<b>3,795.58</b>	<b>49,251.42</b>	<b>17.90</b>	<b>48,860.98</b>	<b>99.21</b>
	<i>*Production data source from April 2019 to March 2020</i>						

1.7.3	FFB description from other source				
	<b>Name of sources/Organisation</b>	<b>Type of Organisation</b>	<b>number of smallholders</b>	<b>Production Area (Ha)</b>	<b>Supplied to Mill FFB (tonnes/year)</b>
	Noor Azlan bin Kasmani (Non-Certified)	Independent Outgrower	-	-	3,515.81
	Green Agro Pyramid Business Trading (Non-Certified)	Independent Outgrower	-	-	1,319.26
	Atil Mela Enterprise (Non-Certified)	Independent Outgrower	-	-	1,310.44
	Pertiwi Palms Sdn Bhd (Non-Certified)	Independent Outgrower	-	-	7,552.39
	CK Teik Enterprise (Non-Certified)	Independent Outgrower	-	-	4,830.59
	MXF Gemilang Enterprise (Non-Certified)	Independent Outgrower	-	-	678.34
	Sg Mai (RSPO Certified)	SOU 11, Sime Darby Plantation Bhd	-	-	2,505.73
	Kerdau (RSPO Certified)	SOU 11, Sime Darby Plantation Bhd	-	-	315.91
	<b>TOTAL</b>				<b>22,028.47</b>
<i>*Production data source from April 2019 to March 2020</i>					
1.7.4	Product categories		FFB, CPO, PK		
<b>1.8</b>	<b>Tonnage of Product</b>				
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (MT)	
	FFB Processed		49,343	51,682.62	
	CPO Production		10,855	10,563.93	
	Palm Kernel (PK) Production		2,467	2,377.40	
1.8.2	Product selling				
	Type of selling product	Actual selling product for last year			
	CSPO sold as RSPO certified product	0			
	CSPK sold as RSPO certified product	0			
	CSPO sold under other scheme	0			
	CSPK sold under other scheme	0			
	CSPO sold as conventional	10,563.93			
	CSPK sold as conventional	2,377.40			
1.8.3	Estimate of Certified FFB Claim				
	<b>Name of Estate</b>	<b>Total Area (Ha)</b>	<b>Planted Area (Ha)</b>	<b>FFB (tonnes/year)</b>	<b>Yield (tonnes/ha/year)</b>
	Bukit Puteri Estate	3,875.80	3,795.58	53,000	18.06
	<b>TOTAL</b>	<b>3,875.80</b>	<b>3,795.58</b>	<b>53,000</b>	<b>18.06</b>
<i>*Projected FFB production for 07 July 2020 to 06 July 2021</i>					



1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Bukit Puteri POM	20	53,000	10,870	20.50	2,520	4.75	MB
	<i>Projected FFB production for 07 July 2020 to 06 July 2021</i>							
1.9	Other Certifications							
	Others			MSPO Certification by Care Certification				
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						
	<b>INDONESIA</b>							
1	Sekunyr.Mill PT Indotruba Tengah	2010	Sekunyr	2010	Seruyan and West Kotawaringin District – Central Kalimantan	Certified		
			Seruyan	2010		Certified		
2	Manggala Mill PT Tunggal Mitra Plantations	2010	Manggala 1	2010	Rokan Hilir District – Riau	Certified		
			Manggala 2	2010		Certified		
			Manggala 3	2010		Certified		
3	Bukit Ajong Mill PT Sime Indo Agro	2010	West	2010	Sanggau District –West Kalimantan	Certified		
			West (HGU on process)	2020		-		
			East	2010		Certified		
			East and Sei Mawang* (HGU on process)	2020		-		
			East Plasma	2010		Certified		
			West Plasma	2010		Certified		
4	Teluk Siak Mill PT Aneka Inti Persada	2011	Teluk Siak	2011	Siak District – Riau	Certified		
			Pinang Sebatang	2011		Certified		
			Aneka Persada	2011		Certified		
5	Sungai Pinang Mill 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	Pemantang Mill PT Teguh Sempurna	2011	Pemantang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified		
			Kawan Batu	2011		Certified		
			Hatan Tiring	2011		Certified		

			Batang Garing	2011		Certified
7	Alur Dumai Mill PT Lahan Tani Sakti	2011	Alur Dumai	2011	Rokan Hilir District – Riau	Certified
8	Teluk Bakau Mill PT Bhumireksa Nusa Sejati	2011	Teluk Bakau	2011	Indra Giri Hilir District – Riau	Certified
			Nusa Perkasa	2011		Certified
			Nusa Lestari	2011		Certified
9	Mandah Mill PT Bhumireksa Nusa Sejati	2014	Mandah	2011	Indra Giri Hilir District – Riau	Certified
			Rotan Semelur	2011		Certified
10	Angsana Mill 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 Mill 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 Sejahtera Sakti	2011	Gunung Aru	2011	Kotabaru District – South Kalimantan	Certified
			Gunung Kemasam	2011		Certified
			Laut Timur	2011		Certified
			Pantai Timur	2011		Certified
			KKPA BSS	2020		-
13	Bebunga Mill. PT Langgeng Muaramakmur	2011	Bebunga	2011	Kotabaru District – South Kalimantan	Certified
			Bakau	2011		Certified
			Sungai Cengal	2011		Certified
14	Sukamandang Mill 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 Mill PT Paripurna Swakarsa	2012	Binturung	2012	Kotabaru District – South Kalimantan	Certified
			Pondok Labu	2012		Certified
			Rampa	2012		Certified
			Sesulung	2012		Certified
16	Rantau Mill 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 Mill PT Laguna Mandiri	2014	Betung	2012	Kotabaru District – South Kalimantan	Certified
			Sekayu	2012		Certified
18	Ungkaya Mill PT Tamaco Graha Krida	2012	Ungkaya	2012	Morowali District – Sulawesi Tengah	Certified
19	Ladang Panjang Mill 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 Mill 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		Undergone audit
GPI KKPA	2020	-				
21	Blang Simpo Mill PT Perkasa Subur Sakti PT Padang Palma Permai PT Perkebunan Sri Kuala	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	Lembiru Mill PT Sandika Nata Palma	2014	Lembiru	2014	Ketapang District – West Kalimantan	Certified
			Awatan	2014		Certified
			Karya Palma	2020		-
			KKPA SNP	2020		-
			Pelanjau (PT BAL)	2020		IC
			Sungai Putih (PT BAL)	2020		-
			Baturus (PT BAL)	2020		-
			KKPA BAL	2020		-
<b>MALAYSIA</b>						
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	Kerdu SOU 11	2011	Kerdu	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 Sebaling	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 SOU 18	2011	Bukit Asahan	2011	Jasin, Melaka	Certified
			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 SOU 29	2009	Mostyn	2009	Kunak, Sabah	Certified
			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
34	Pekaka SOU 34	-	Bintulu, Serawak	-	-	Withdrawn
35	Bintang Oil Mill SOU 35	-	Johor	SDP acquired Bintang Palm Oil Mill in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1 Oct 2018, the mill has completed the selling transaction.		
<b>LIBERIA</b>						
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
<b>P &amp; G (New Britain Palm Oil)</b>						
1	Poliamba Poliamba (POL)	-	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 - Guadaical Plains Palm Oil Limited (GPPOL)	2011	Tetere	2011	Gudaicanal, Solomon 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 – Higaturu Oil Mill (HOP)	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 – Ramu Agricultural Industries Ltd (RAIL)	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 – Milne Bay Estate (MBE)	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		2008	Bebere	2008	West New Britain	Certified

	Mosa; Kumbango; Kapiura; Namumdo; Waraston – West New Britain (WNB)		Kumbango	2008		Certified
			Togulo	2008		Certified
			Dami	2008		Certified
			Waisisi	2008		Certified
			Kautu	2008		Certified
			Karaisu	2008		Certified
			Moroa	2008		Certified
			Bilomi	2008		Certified
			Loata	2008		Certified
			Haella	2008		Certified
			Garu	2008		Certified
			Daliavu	2008		Certified
			Sapuri	2008		Certified
			Malilimi	2008		Certified
			Rigula	2008		Certified
			Nomundo	2008		Certified
			Navarai / Karato ME / KDC EU	2008		Certified
			Volupai . Lotomgam / Natupi / Goruru	2008		Certified
			Lolokoru	2008		Certified
			Ove	2008		Certified
			Tamare	2008		Certified
			Smallholders LSS Mosa (1822)	2008		Certified
			Smallholders VOP East (1817)	2008		Certified
Smallholders VOP Central (1964)	2008	Certified				
Smallholders VOP West (1279)	2008	Certified				
Smallholders LSS Kapiura (551)	2008	Certified				
Smallholders VOP Kapiura (850)	2008	Certified				
Smallholders Kaulong/Akami/Pushiki/Repamira/Sakapei (20)	2008	Certified				
7	Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	2020	Munum Estate	2020	Lae Morobe	Certified
			Maralumi Estate	2020		Certified
			Erap Estate	2020		Certified
	Sime Darby has achieved 34 management units in Malaysia, 25 management units in Indonesia, 10 management units in P&G that RSP0 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					

	<p>(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"> <li>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.</li> <li>2. Selabak Mill, PT Swadaya Andhika: Mill stop operate since.2017 and the supply bases is transfer to Rantau POM, PT Laguna Mandiri</li> <li>3. Pekaka, SOU 34: Mill stop operate since 2017 and the supply bases is transfer to Lavang, SOU 31</li> </ol> <p>As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI).</p> <p>Sime Darby has informed the Time Bound Plan progress. MUTU has consider that Sime Darby still comply with the RSPO requirement for partial certification. New updated in September 2020 is described as follows:</p> <ol style="list-style-type: none"> <li>1. Subur Abadi Plasma (supply base of Mustika Mill) with plan for certification is 2020. SAP 1 has been audited by the Certification Body in 2017. The identified legal issue on HGU is being address.</li> <li>2. Ladang Panjang Mill of PT Bahari Gembira Ria: Only Division 3 (1,200 ha) was certified. Division 1 and 2 with 1,792 ha has received HGU recently. The unit is getting ready for certification. Plan for certification in 2020. Total Ladang Panjang Estate is 2,992 ha. Plasma BGR Estate plan certification in 2020, Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR.</li> <li>3. The new project at KKPA Maju Bersama (supply base of Gunung Aru POM) by the plasma community is currently in nursery stage and not yet due for harvesting, the year of planting was in 2014.</li> <li>4. Rantau Panjang Mill of PT Guthrie Pecconina Indonesia: land legalization process for 4,152.70 ha (Rantau Panjang Estate, Napal Estate, Mangun Jaya Estate and GPI KKPA) is still on process. Sungai Jernih Estate has undergone audit. However, land legalization is still in process.</li> <li>5. Sungai Pinang Mill of PT Bina Sains Cemerlang: land legalization process for 308.35 ha (Sungai Pinang Estate and Bukit Pinang Estate) is still in progress.</li> <li>6. Ungkaya Mill of PT Tamaco Graha Krida: Plasma TGK has no more FFB supply base, since the credit was over.</li> <li>7. Bukit Ajong Mill of PT Sime Indo Agro: land legalization for Sei Mawang Estate, East Estate and West Estate for 5,815.64 ha is still in progress. Sei Mawang Estate is currently combined with East estate.</li> <li>8. PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill, i.e. Lembiru Mill. Legalization is still on progress.</li> <li>9. The property of PT Mitra Austral Sejahtera was sold and currently Sime Darby Plantations have no control in the management. A letter to RSPO Secretariat has been sent on 27 June 2019 on the conformation of disposal of PT MAS and reported to Bursa Malaysia accordingly.</li> <li>10. As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI).</li> <li>11. Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd. (Papua New Guinea) was certified on 27 March 2020. There is total area for NPP: 710.30 ha which is currently excluded from the certification scope until the NPP is approved</li> </ol>
1.10.2	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>
	There is no scheme smallholder under Bukit Puteri POM - SOU 10 SDP.

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA 1.4	<p><b>Mahaswaran Maliyapan (Lead Auditor):</b> is a Malaysian holds an Executive Master in Entrepreneurship Enhancement [Supply Chain Management], Professional Diploma in International Management Practices, Graduate Diploma in Business Administration, and Diploma in Mechanical Engineering. Has vast exposure and experience in engineering, quality, 2nd &amp; 3rd party auditing in various industries and owns proven track records of auditing various multinational companies both locally and internationally. Certified Lead Auditor for ISO 9001, 14001, OHSAS 18001, MSPO P&amp;C, MSPO SCC, RSPO P&amp;C, RSPO SCC, RSPO Next and certified ISO 37001 Provisional Auditor. Since 2012 trained in agriculture certification programs such as RSPO, MSPO and SCCS and holds role as lead auditor or auditor with several local and overseas certification bodies. He too in Quality Environmental Management System as well the Occupational, Health and Safety auditing. During this assessment, he assessed on the aspect of Management Commitment, Transparency, Legal, Safety and Health, Social, Stakeholder's Consultation, Workers Welfare, Environment and SCCS. He is able to speak and understand Bahasa Malaysia and English.</p> <p><b>Mohd Rizal Kassim (Auditor):</b> is a Malaysian, graduated from University Institute Technology Mara and (UITM) and holding a Diploma in wood industry. He has a vast experience in lab testing, quality control and chemical handling in the industry. He has completed several certification lead auditor courses such as RSPO, ISCC, and ISO lead auditor courses. He also certified as health and safety officer by FMM institute (SHO /046/2009) and completed the Qualifor chain of custody and controlled wood training course. Since 2012 he has audited a various scheme including RSPO P&amp;C, RED, and RED standard, ISCC standard in multiple countries including Malaysia, Taiwan, Indonesia and Australia. During this assessment, he was assigned on respect community and human rights and deliver benefits and respect worker's rights and conditions.</p> <p><b>Yap Chin Hung (Auditor):</b> is a Malaysian who graduated from University of Malaya with a Bachelor of Engineering (Honours) Degree in Manufacturing Engineering. He is a member of the Institute of Engineers, Malaysia. He had consulted and trained clients from various industries such as chemical, metal fabrication, engineering, electronics, manufacturing, fabrications, plastics, construction and trading in setting up and implementing the Management Systems based on ISO 9001, ISO 14001, ISO 13485, ISO 2200, HACCP, GMP, FSC and OHSAS 18001. Along his service as ISO consultant, he has assisted more than 100 companies to obtain the ISO certification from various Certification Body. Yap is also the associate auditor for QE Certification, UK helping in carrying out 3rd party certification audit for ISO 9001, ISO 14001, ISO 22000 and OHSAS 18001 During this assessment, he conducted an assessment on Environment Aspect (EIA) and Health &amp; Safety aspect.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA 1.4	<p>Number of auditors: <b>3 auditors</b></p> <p>Number of days for ASA-1.4 at site: <b>3 days</b></p> <p>Number of working days for ASA-1.4 at site: <b>9 Working days</b></p>
2.2.2	Assessment Process
ASA 1.4	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the Bukit Puteri POM, SOU 10 to the requirements of Malaysia National Interpretation (MYNI) of The RSPO Principles and Criteria for The Production of Sustainable Palm Oil 2018, Endorsed by the RSPO of Governors on 7th November 2019 (* Revised 17 July 2020 with insertion of additional guidance and reference for indicator 3.4.1) and RSPO Certification System for Principles and Criteria, 14 June 2017.</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>The assessment program as per in Appendix 2.</p>

2.2.3	<b>Locations of Assessment</b>
ASA 1.4	<p>This mill is located in Bukit Puteri Estate, who have a valid land ownership under Sime Darby Plantation Bhd. (SDP) They land was previously owned by LKPP, bought over by Austral Enterprise and later by Golden Hope. Through amalgamation the property now belongs to China Engineer Sdn Bhd (a subsidiary of SDP). This mill is located at Raub District and 33 KM from Kuala Lipis town. The mill was commissioned in 2005 with a processing capacity of 20 MT/hr.</p> <p>Based on the mill's layout plan, it is located on Bukit Puteri Estate inclusive of effluent treatment plant and water reservoir. The yearly processing capacity allowed by MPOB is about 120,000 MT of FFB with crop combination (Apr'2019 – Mar'2020 total FFB received was 70,889.45 MT) of 72.91% / 51,682.62 MT internal (SDP owned RSPO certified estates) and 27.09% / 19,206.83 MT external suppliers includes of collection centres. There are 2 CPO tanks each 2000 MT and for the PK, there is a tank with 300 MT. The daily production report seen able to separate effectively of the FFB received from RSPO certified and non-certified sources.</p> <p>During this audit, interviewed with mill and estate managers, field staff, estate and mill workers (local and foreigners) reveals no issue of concerning oil palm processing violating any environmental, social nor applicable legal regulations. The audit team has also cross verified via interview with workers on SDP's response to the "Statement Made by Liberty Shared" dated 4 August 2020" and the press statement dated Friday, 7 August 2020. The content of statement was on excessive overtime, retention of identity documents, physical and sexual violence, deception, debt bondage, abuse of vulnerability, abuse of working and living conditions, restriction of movement, withholding wages, isolation and intimidation &amp; treats. However, sampled workers and staff during this audit does not resulted with positive against the statement.</p> <p>In Bukit Puteri Estate, the audit team was granted visits to manuring at block of 12B, where 3 workers (2 India + 1 Bangladesh) and 1 local Field Supervisor were interviewed in regards to worker's welfare, basic minimum wages, trainings on OSH and etc. Auditors visited the replanting area at block 97A (20A), landfill at block 15B, riparian area at block 14C (Sg. Telang) and nursery at block 97C. and were interviewed on gender equalities, restriction of movement, discrimination against foreign workers and their understanding towards environment, company facilities and retention of identity documents.</p> <p>The estate and mill workers are being accommodating in a centralize housing complex. Based on visit and interview with workers known that the adequate housing, clean water supplies, medical, mosque, temple, electricity and access to food to nearby sundry shops has been provided. Foreign workers are housed according to their ethnicity and religious beliefs and have adequate beds, clean running water from taps, kitchen and toilet facility.</p> <p>Fertilizer store, workshop, schedule waste store was sighted with relevant signages, labels, SDS, spillage kits, PPE, first aid kits and emergency contacts. Replanting area of 86 Ha in block 97A (21A) seen with no traces of fire used during land preparation. The verification on boundary stones found well maintained, trenches along the boundaries next to smallholders and government reserved land are well managed.</p> <p>During visit to production area in mill, workers in engine room, effluent treatment plant, water treatment plant, loading ramp and boiler room were interviewed on OSH awareness, reporting mechanism during an emergency, medical surveillance, audiometric test results and basic human rights that they were able respond well.</p> <p>In effluent treatment plant found no traces of overflow and signages that required by "Jadual Pematuhan" are well displayed. The weighbridge operator was interviewed on her understanding of Supply Chain Certification System (SCCS) and cross verified the weighbridge tickets for incoming FFBs and dispatched CPO and PK. Interviewed with workers at grading area, found they were provided training on grading, record keeping and complaint &amp; grievance mechanism.</p>
2.3	<b>Stakeholder Consultation and Stakeholders Contacted</b>
2.3.1	<b>Summary of stakeholder consultation process.</b>
ASA 1.4	<p>Summary of stakeholder consultation process:          During the audit dates, there was no external stakeholders' presence as the local communities, contractors, suppliers and other government agencies concerns over growing Covid 19 pandemic cases.</p>



	<p>Consultation of stakeholders for Bukit Puteri POM SOU 10 was held by:</p> <ul style="list-style-type: none"> <li>• Public Notification on website: 31<sup>st</sup> August 2020</li> <li>• Public consultation meeting with internal stakeholders and contractor: Gender Committee Chairwoman for Bukit Puteri Complex – Norzamirah Abd Manaf (18 September 2020)</li> </ul> <p>Numbers of input from stakeholders were clarified by auditors through field observation and document verification.</p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	Please find appendix 1
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit re-assessment will be conducted eight (8) months to twelve (12) months after date of annual license.

**3.0 ASSESSMENT FINDINGS**

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

MUTUAGUNG LESTARI has conducted an assessment of SOU-10 Bukit Puteri POM subsidiary of Sime Darby Plantation, Bhd. operation consisting of (one (1) mill and one (1) oil palm estates.

During the assessment, there were one (1) Nonconformity Major were assigned and two (2) opportunities for improvement were identified

MUTUAGUNG LESTARI found that SOU-10 Bukit Puteri POM subsidiary of Sime Darby Plantation Bhd. complied with the requirements of Malaysia National Interpretation (MYNI) of The RSPO Principles and Criteria for The Production of Sustainable Palm Oil 2018, Endorsed by the RSPO of Governors on 7th November 2019 (\*Revised 17 July 2020 with insertion of additional guidance and reference for indicator 3.4.1) and RSPO Certification System for Principles and Criteria, 14 June 2017.

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>		
<b>1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>		
<p><b>1.1.1, 1.1.2, 1.1.3, 1.1.4, 1.1.5</b></p> <p>As per SDP PQMS (Sime Darby Plantation Quality Management System) dated on 01/11/2008, where appropriate information to made available top requester(s) through annual reports, circulars, agreements, SDP websites and other publications. Aside, the requester’s information to be channeled to Group Sustainability Department (GSD), Communication Department and Legal Department of SDP.</p> <p>Since the mill is located in Bukit Puteri Estate, therefore the estate management jointly with mill management conducted the annual external stakeholder meeting that dated on 06/07/2020. The attended stakeholders were briefed on sticker to be paced on visitor’s dress, request of soil from SKSP and SJKC, com intrusion, use of estate roads by surrounding communities and etc. In SDP-QMS, Sub-Section 5.5 page 3 – point 6.3 is stated the mill and estate to provide feedback to any requesters within 2 weeks that requiring direct feedback and 1 week for communications that required investigation.</p> <p>Cross verified the company’s website, www.simedarbyplantation.com under the “Sustainability” column seen available of documents in English such as Sustainability Report, Responsible Agriculture Charter, Human Rights Charter, Sustainability Policies, Supply Chain Management, Hotspot Alert Dashboard and others.</p> <p>There are no on-going disputes concerning to the Bukit Puteri estate and mill’s legality. The content of SDP-QMS, Appendix 5.5.3.2 for external communication and SDP-PQMS, Flowchart in Appdx 5 detailed procedure on handling social issues communicated to both internal and external stakeholders via briefing during muster ground and in external stakeholder meeting respectively.</p> <p>Based on the stakeholder logbook, there was no major issues reported nor any request from external stakeholders. There are a few requests from workers for housing maintenance that responded effectively by mill management. 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.</p> <p>There is a flow chart titled dated 01/11/2008 “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) are made available for handling stakeholder’s social</p>		

issues. The appointment letter for PIC in charge for communication with external stakeholders clearly indicates the roles and responsibility of the person. Sighted the presentation slides for the annual stakeholder and the stakeholder list has input of stakeholder's type, contact details and email IDs.

Status: Comply

**1.2  
The unit of certification commits to ethical conduct in all business operations and transactions.**

**1.2.1, 1.2.2**

Sighted the Human Rights Charter that addressing commitments to avoid causing, contributing, being linked to adverse human rights impacts through business activities. The policy is also available in tshe company's website. In Code of Business Conduct seen the implementation acknowledge the challenges while engaging 3<sup>rd</sup> party contractors and other business associates that may involve in the process of worker's employment and involving in mill and estate operations.

Sighted the external stakeholder meeting slides consist of explanation on Code of Ethical, Whistleblowing policy, Code of Business Conduct and etc. During mill and estate visit, interviewed with local and foreign workers found they post with basic understanding on "Human Rights" and confirmed there was no ethical discrimination by the respective management units.

As per interview with estate's and mill manager, the respective management encourage and promote the "Whistle Blowing" policy via muster ground in estates and toolbox meeting in mill. In the event any misconduct against the Ethical Policy, the mill or estate to conduct "Domestic Inquiry" and communicate with HR department for necessary actions.

Status: Comply

**PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS**

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

**2.1.1, 2.1.2, 2.1.3**

In Bukit Puteri POM, the "Legal & Requirements Register" was checked and approved for compliance by the Mill Manager. There were changes addressed in the regulation such as Prevention and Control of Infectious Diseases Act 1988 (Covid 19) updated 14/04/2020, Employment Provident Fund Act 1991 (Act 452), Minimum retirement Age Act 2012 (Act753) and etc. Sample verified permits and licenses such as D.O.E annual license renewal [ref: 004160 – 20 MT/HR] in accordance to EQA 1974, Sec. 11 that expires on 30/06/2021 and land application is not applicable.

The authorized schedule waste collector is Kualiti Alam Sdn. Bhd. – Transporter & Waste Receiver Code is 50013-904-003. The Fire Certificate as required under Fire Services Act 1988 and Fire Services (Fire Certificate) Regulations 2001, valid from 08/11/2019 to 07/11/2020 – JBPM:PH/7/0191/2017.

The Quarterly Return Form as per First Schedule of the Environmental Quality (Prescribed Premises) (Crude Palm-Oil) Regulations, 1977 – report to DOE sighted for 2nd Quarter dated on June 2020 [ref. (AS)C31/152/000/072 - 004160]. Total CPO produced 4458.56 MT / total FFB processed 22629.74 MT and total water consumed was 22855 cubic meters(m3).

In Bukit Puteri Estate, verified permit for air compressor [PMT TG/20 31691] in accordance to Factories and Machineries Act 1967 – Notification, Certificate of Fitness, and Inspection Reg. 1970 10(2). Expires on 16/03/2021 and permit [C000440] for diesel – 16,380 Liter expires on 25/05/2021. The identification of changes is the responsibility of sustainability department in HQ whom shall notify in written to the mill & estate representatives of the changes. It then the respective operating unit's manager to delegate the information among their team members.

The sustainability team and/or the estate manager to carry out periodic review and evaluation on applicable laws and regulations. The Medical Assistant is the assigned person to monitor the updates of legal requirement and to correspond with Regional Sustainability Team for revisions. As per the indication in Internal Audit Summary, findings pertaining to legal requirements requires immediate attention from audited management units.

OBS:

*Bukit Puteri POM, The license for water source – SWUL/LPSA/58/2019, water extraction from Sungai Sertang, Batu Yon Lipis. The license expired on 31/12/2019, however a letter dated 19/12/2019 from "Pejabat Setiausaha Kerajaan Pahang"*

<i>stating renewal process are stop till further notice.</i>	
<b>Status: Observation</b>	
<b>2.2</b>	
<b>All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</b>	
2.2.1, 2.2.2, 2.2.3	
<p>List of contracted parties documented in "List Supplier FFB to SOU 10 KKS Bukit Puteri". The list includes details such as supplier names, address, PIC and contact numbers. The list identifies suppliers under 2 categories, the 1st is estates within SDP group. There are no written contracts between the supplying estate and mill as it manages within SDP group of estates.</p> <p>The estate was able to produce the BCOC, that proves the appointed 3rd party contractors to comply with legal requirements such as not employing young workers, if employing foreign workers, the passport and permit particulars to be given to estate, provide a decent living space for his workers and etc.</p> <p>Contract agreement was sighted for external FFB suppliers with information on buyer, seller, quantity, OER rates, relevant cost, payment term, force majeure. Sighted the "Code of Business Conduct", the terms and conditions of the contracts have been included in this document.</p> <p>Seen, point No.05, on labour &amp; human rights that includes of equal opportunities, non-discrimination, elimination of harassment &amp; violence, illegal substance, criminal activities, reasonable wages &amp; benefits, eradication of exploitation, abolishment of child labour &amp; protecting the rights of children and etc. The mill periodically conducts meetings and to carry out announce audit / visit to ensure supplier's compliances.</p>	
<b>Status: Comply</b>	
<b>2.3</b>	
<b>All FFB supplies from outside the unit of certification are from legal sources.</b>	
2.3.1, 2.3.2	
<p>In mill, sighted the MPOB license and expiry dates of FFB suppliers seen stated in the supplier list. Content of ownership in MPOB license were matching with FFB Delivery Note. As for 2020, the OCPs that registered as supply bases were invited for briefing on RSPO requirements compliance on 03/07/2020 and each have their official contract agreements signed.</p> <p>There is another list available indicating of location / address, GPC co-ordinates, quantity of FFB delivered. Sighted the daily generated FFB supply report that has information on year of planting as SDP has a mechanism "Responsible Sourcing Guidelines" that only allowing FFB from suppliers who have not converted peat land for oil palm planting after 2010 and have not opened primary forest for oil palm planting after 2010.</p> <p>This was cross verified against SDP Group Sustainability (SD/SDP/GS/001) dated on June 2020. The collection centers are sending FFBs 6 days in a week and the mill strictly not allows any smallholders or unregistered outgrowers to send their FFBs. The collection center maintaining the FFB bookkeeping via Excel spreads sheet.</p>	
<b>Status: Comply</b>	
<b>PRINCIPLE #3 OPTIMISE PRODUCTIVITY, EFFICIENCY, POSITIVE IMPACTS AND RESILIENCE</b>	
<b>3.1</b>	
<b>There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</b>	
3.1.1, 3.1.2, 3.1.3	
<p>Sighted 5 years Business Plan for the mill that for 2010/2021 to 2024/2025, that mill manager has acknowledged. Seen the inputs includes of processing cost such as for reception, handling, sterilization, threshing, pressing and etc. Bukit Puteri Estate has a 5 years business plan (2021 – 2025 M-Plan) that with forecast of matured area, FFB production, yield per hectare and total planted area.</p> <p>Based on the plan, the total planted area from 2022 to 2025 will be 3795Ha, the matured area for the same period expected</p>	

is 3518Ha, 3424Ha, 3406Ha and 3367Ha.

The replanting programme seen for 5 years period from 2021 to 2025. Based on the plan, in 2021 total area for replanting is 88.38 Ha, 2022 is 105.88 Ha, in 2023 will be 181.47 Ha, in year 2024 is 85.24 Ha and in year 2025 will be 198.76 Ha. During field visit at Block 1997A/2020A and Block 1997B/2020B, found the palms were felled and chipped with no traces of fire been used as natural composing practiced.

The annual management review was done as planned and participated by mill and estate managers, assistants and chief clerk. Among the issues discussed were results of DOSH visits, verification of stakeholder list, records of communications with OCP, result of audiometric test, the status of HIRADC, meeting output of gender committee, the cleanliness of worker's line-site and etc.

Status: Comply

**3.2  
The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.**

**3.2.1, 3.2.2**

In mill, sighted the Continuous Improvement Plan that divided into environmental pollution prevention (water/air/high water usage/high boiler fuel consumption), waste management (schedule waste/domestic waste/recycle waste), contingency plan during water shortage, water management plan (water catchment pond/State water supply – PAIP), diesel management plan (genset/backhoe & tractors) and safety management programme.

Since the mill does not receives any negative comments / feedbacks from internal and external stakeholders, therefore no CIP develops from previous assessment. In Bukit Puteri Estate, the CIPs are divided into environment, social and OSH. Example, management plan for wastewater that generated at premixing, PPE washing area and line site.

Sighted the "Identification & Management of Wastewater" consist of processes such as chemical mixing area (spillage), PPE washing area for sprayers (water ways), workshop, line-site (domestic water discharge) and washrooms in main office. The action plans to reduce fresh water are to encourage rain harvesting and monitoring of pipe leakages.

Status: Comply

**3.3  
Operating procedures are appropriately documented, consistently implemented and monitored.**

**3.3.1, 3.3.2, 3.3.3**

The mill has 3 tiers of documents namely Mill Quality Management System (MQMS – Level 1), Standard Operating Procedures (SOP – Level 3), Standard Operating Manual (SOM – Level 2), Level 4 consist of OSH manual, training manual, work instructions and etc. The Level 5 are records. Verified the SOPs which documented in SDP/SOP/01, dated 01/01/19. Sighted the Section 4.0 for Threshing Station, 5.0 Pressing Station, 6.0 Clarification Station, 7.0 Depericarping Station, 8.0 Kernel Recovery Station and etc. Cross verified training records and found monthly training records are available as per planned schedule.

The estate is referencing to "Sime Darby Agricultural Reference Manual – Oil Palm Planting" as part of good agriculture practices. The manual consists of all plantation operation activities, such as planting material, new planting, replanting, palm replacement and chemical controls over pest and disease.

Mechanism for check consistent the implementation of procedures is conducted by Plantation Advisory & Mechanization Department and Group Corporate Audit Department (GCAD) that conducted the internal audit about financial and operational activities every 6 month (2 times a year). Sighted the external stakeholder list that consist of contractors who has signed the Code of Conduct as well been briefed on the applicable legal requirements during Townhall meeting. The estate and mill monitoring the contractor's compliance to CoC upon every job completion. During field visit, sighted the replanting works done as per work order.

The Company has a procedure for managing soil fertility in the Agricultural Reference Manual issued on 1/7/2011. In the SOP, there are several parts related to soil fertility management such as inorganic fertilization, organic fertilizer used EFB and POME and planting of land cover using legume. In the fertilization section described that inorganic fertilization is based on fertilizer recommendations made based on foliar analytical, FFB production, rainfall, soil type and observation

during field inspections.

Internal audit conducted on yearly basis for monitoring of SOPs implementation. Daily and weekly monitoring performed by supervisors and assistants. SOU monthly briefing performed for communication of SOPs and reminder for all employees. Aside of regularly briefings on OHS, environment and social related during daily muster ground, the estate has also had in-field trainings such as for weeders. Various trainings being planned for all level of workers and the evidence of training done sighted via training records that detailed in 4.7.2.

Status: Comply

**3.4**

**A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.**

**3.4.1, 3.4.2, 3.4.3**

During site visit, found the mill and estate has no extension of its operation or acquired new land for mill's or estate operations. This was cross verified against DOE licensing in mill and land title against the area statement which found well linking. However, the mill is maintaining a pollution prevention management plan for on-going operations.

Since the mill is located within Bukit Puteri Estate, therefore the initial SIA was done as whole SOU 10 dated on 7-18/09/2015 and as per interview with mill manager, the next Social Impact Assessment [SIA] has plan in 2<sup>nd</sup> quarter of 2020 but due to Covid-19 Pandemic it been delayed to 4<sup>th</sup> quarter.

Verified the EIP (Environmental Improvement Plan) that consist of water pollution (built new holding pond for desludging), air pollution (installation of ESP), high water usage (eliminate water wastage with dry cleaning) and higher boiler fuel consumption (rectify steam leakages).

These are seen linked to PRMP (Pollution Preventive Management Plan) that tackles on individual process. In estate, based on the management plan on social impacts that was done in Aug'2020, workers are advised to wear suitable face musk for every visit to estate's panel clinic (Klinik Zara) as prevention for Covid 19. As a result, the estate management has provided free face masks to workers.

As per interview with Sustainability Member, the mill is not planning for a standalone SIA as the outputs from annual external stakeholder meeting, gender committee meeting, OSH meeting and union meeting are able to provide social related issues that to incorporated into management plan. The SIA plan seen able to link with output from OSH meeting, gender meeting and external stakeholder meeting minutes.

Another SIA plan is for main road to the mill are rutted and need to be repair, that estate management agrees to repair continuously especially during dry weather. As for the new wages of RM 1100.00, the estate management has conducted briefing to the workers.

Status: Comply

**3.5**

**A system for managing human resources is in place.**

**3.5.1, 3.5.2**

There are 2 types of employment procedures available. The 1st is on "Hiring of Local Workers" by (Field Supervisor and below) to comply to (01-11-19) handle by estate / mill by completing requisition form. The 2nd is on "Foreign Worker's Employment", SOP by Workforce Management Unit (WMU) Liaison & Recruitment (LR) – WMU/LR-SOPP/MARCH2016. The flowchart available on "Application for Levi Refund (Medical Unit) from KDN.

The SOP outline the recruitment drive & interview/selection process for potential foreign workers either by the WMU at the country of source or by the appointed agents in the respective country of recruitment. Verified the E-Checkroll maintained by mill and estate, that with latest employee list and database effectively computed. The basic amenities for local and foreign workers are well allocated / provided. The provision of retirement for local workers as of MAPA/NUPW Collective Agreement, copy of agreement given to workers and etc.

Aside, the foreign worker's passports are holds by respective workers as stated in recruitment process and worker's contract agreement. A copy of the employment contract available with worker's interviewed. Cross verified the interviewed



with foreign worker's contract agreement and found evidence of acceptance at the last page.	
<b>Status: Comply</b>	
<b>3.6</b>	
<b>An occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</b>	
<b>3.6.1, 3.6.2</b>	
<p>Occupational Safety &amp; Health Policy signed by Mr. Roslin Azmy Hassan (CEO) dated 01/06/2020 sighted in RSPO file and copies available at office notice board and mill's operational site. The policy seen available in Bahasa Malaysia and English that can be understood by all levels of its employees, translators are allocated if and when required.</p> <p>OSH Plan that includes of achieving cumulative manhours without LTI from year 2020 by having weekly briefing and townhall safety meetings. Another objective established is to achieve zero accident cases by continuously provide trainings in accordance to SOPs.</p> <p>Risk assessments were conducted through HIRARC based on the severity and the likelihood. HIRARC is consist of hazard identification (type of work activity, hazard &amp; effect), Risk analysis (Existing risk control, likelihood, severity &amp; risk) &amp; Risk Control (Recommended control measures &amp; PIC appointed are Staff or Executive).</p> <p>During mill visit by team to Loading ramp, Boiler Room, Chemical Store, Schedule Waste Store and Workshop, it was found the PPEs are provided to respective workers as per stated in Hiradc assessment. Interview with workers reveled PPE's were provided free of charge annually that can be replaced if broken or improperly used.</p> <p>OSH meeting (it was lapsed 6 months due to Covid 19) scheduled and conducted quarterly and the meeting has been conducted as planned. Emergency response plan available in local language (Malay and English) and the ERP has been explained to all workers and staffs during training which has been conducted. Emergency response plan include the emergency contact number, and also have Guidelines on Accident, Emergency Procedures and Exit routes as well as assembly point in file and pasted on notice board.</p> <p>In estate, the interval of reviewing of Hiradc is based on, if no case arise it should be review annually and if any case happens a revised SOP will be established and Hiradc will be reviewed. There are mitigation plans for the identified issues, such as SOP trainings for harvesters, manures and general workers and OSH quarterly meeting to review accidents and near missed. Among the issues discussed were results of medical surveillance, EHS trainings, internal audit findings, accident / near miss and etc. The recent OSH quarterly meeting was done on 18/06/2020 attended by 9 workers and 9 from management team.</p>	
<b>Status: Comply</b>	
<b>3.7</b>	
<b>All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</b>	
<b>3.7.1, 3.7.2, 3.7.3</b>	
<p>The mill is maintaining a list of staff, workers, outgrowers and suppliers, that a training matrix correspond with. Sighted the annual training programme in place that that includes on environment, safety and social. The shift in charger and mill assistants are regular identify training needs for operational workers, such as those working in high risk areas such as sterilizer and engine room.</p> <p>Sighted training records for chemical handling, proper way to use PPE and many others. Sighted training matrix that consist of 18 programs is available for estate's payroll workers/staff and for 3rd party contractors or service providers, the required trainings will be provided based on needs. The training matrix shows on which staff / workers needs what sort of trainings, example for Mandore the trainings needed are Hiradc, first aid, accident investigations and etc and not required such as induction training for new workers.</p> <p>Based on the field training records and interviewed Mandores found the training records are maintained by respective Mandores. Verified training records for Townhall 8.0 /COBC / Policy / RSPO was attended by all estate workers during morning muster that evidenced with signature in the training list.</p> <p>Based on interview with Regional Sustainability Member and SOU 10 Chairman, all the external service providers and vendors, will be given training on 4 aspects. Firstly, on Business Code of Conduct which outlines SDP's ethical policies. Secondly on OSH that provides awareness on safety while in estate and mill premises and the safety requirements that</p>	

to be followed. Thirdly is on environmental awareness that includes on schedule waste management and briefing on significant impacts resulted from EIA. The last is on social related issues such as no employment of child labour, no forced labour, complying to legal requirements and etc.

The mill and estate have no external or contractor's workers during the period of audit. Interviewed with mill and estate workers reveals, the management gives huge importance to trainings and the effectiveness of training always monitor by the Field Supervisor. Besides of the formal annual trainings, the estate and mill management provide instant briefing on OSH, environment and social during muster ground.

**Status: Comply**

**3.8**

**Supply Chain Requirements for Mills**

**3.8.1 to 3.8.14**

This mill is located at Raub District and 33 KM from Kuala Lipis town. The mill was commissioned in 2005 with a processing capacity of 20 MT/hr. Based on the mill's layout plan, it is located on Bukit Puteri Estate inclusive of effluent treatment plant and water reservoir. The yearly processing capacity allowed by MPOB is about 120,000 MT of FFB with crop combination (Apr'2019 – Mar'2020 total FFB received was 70,889.45 MT) of 72.91% / 51,682.62 MT internal (SDP owned RSPO certified estates) and 27.09% / 19,206.83 MT external suppliers includes of collection centers.

There are 2 CPO tanks each 2000 MT and for the PK, there is a tank with 300 MT. The daily production report seen able to separate effectively of the FFB received from RSPO certified and non-certified sources. Aside, the delivery notes from RSPO certified sources seen with compliance to SOP (SDP-PQMS, Section 1, Issue 1 dated 01/11/2018). The estimated tonnage of CPO and PK for period Apr 2019 – Mar 2020 was verified and no quantity was sold under RSPO-MB scheme but as conventional product.

The Global Trading & Marketing Department (GTM) to register the transaction of CSPO / CSPK in the Palm Trace during physical deliveries and records maintained accordingly. The Palm trace documents and other relevant records emailed to buyer and mill. The mill eventually deducts the confirmed quantity of traded volume from their fixed accounting system accordingly. If there are any RSPO-MB transactions,

the Palm Trace documents and other relevant records emailed to buyer and mill. The mill eventually deducts the confirmed quantity of traded volume from their accounting system accordingly. There is a procedure (SDP-PQMS, Appendix 15, Issue 5 dated Apr 2019 established for supply chain process control. Since the mill adopts to MB Module, therefore the procedures are seen clearly indicates the required mechanisms to ensure the objective of MB is monitored and achieved.

As per the SOP, the mill manager is the person having overall responsibility for and authority over the implementation of RSPO SCC. Their responsibility stated in the organization folder. In the SOP (Point 7.0) mentioned above, mentioned on the process of receiving certified and non-certified FFBs and Point 9.0 on process monitoring. The process to conduct internal audit specified in SDP-PSQM – SD/SDP/PSQM/IAP, dated on 01/11/2017. Sighted the summary report dated on 03/03/2020 done by members from sustainability team from HQ whom has been attended and/or trained on RSPO SCC.

The internal audit results and findings were review during Management Review Meeting dated on 25/06/2020. The daily production report seen able to separate effectively of the FFB received from RSPO certified and non-certified sources, verified records by mill's monthly weighbridge compilation (Mass balance Book keeping).

Since from the ASA 1.3, there was no projected or actual overproduction of certified tonnage. Mill have mechanism to handle non-conforming products/documents as specified in point 11.0 in SDP-PQMS, Appendix 15, Issue 5 dated Apr 2019. Verified delivery order, receiving and dispatch slips, weighbridge tickets that effectively carries the information of RSPO SCC MB model.

The mill does not sell any RSPO MB but as conventional for period of Apr 2019 to Mar 2020. The external transport company seen binded an agreement for transporting CPO from mill to designated locations. This is a short-term contract as added to clear stock balance.

The contracts seen includes of transport rates adjustment table, code of conduct and etc. Ownership changed once CPO reached to the buyer's destinations. The contract sighted with Agreement Term and Conditions" mentioned shall comply with SDP Sustainability Policy and shall subjected to the management system audits by auditors assigned by the

management as and when deemed necessary.

Sighted the mill has complete database of all suppliers, contractors and vendor that was reviewed and updated in 31/08/2020. The mill has not outsourcing any processes nor hired any new contractors since from the previous assessment. The assistant manager jointly with weighbridge operator accountable for the record keeping.

Conversion rate is based on production volume. Verified the production report for Aug 2020 and interviewed mill manager found the production output discuss on daily basis. Based on the MB Book Keeping at mill, found 1 batch of CPOMB (469.81 MT) dispatched in April 2020, however, GT department has transacted the lot as conventional from Nuri Bulking Station.

Status: Comply

**PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS**

**4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.**

**4.1.1, 4.1.2**

SDP has established the respect employee right policy through policy date 1 June 2020 sign by the Group CEO, on the policy has specified that all workers will be treated fairly, respect and uphold the right of workers including contract, temporary and migrant workers, the policy has been circulated to all level of employees through training and briefing during morning muster call. Training record are available example in the mill date on 15 June 2020 that has been attended by 30 Workers and Management.

The certification unit was not instigated the violence or use any form of harassment to their workforce. The management has engaged the auxiliary polices and watchmen just for security in their plantation premises to prevent crime and property from any illegal encroachment from outsiders and maintain harmonies. Sighted the estate organizational chart Aps and watchmen engaged by the estate management in visited mill and estates.

Status: Comply

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

**4.2.1, 4.2.2, 4.2.3, 4.2.4**

Stakeholders engagement and negotiation available in Mill Quality management system, Procedure of External communication has been established as the consultation and communication procedures to relevant stakeholders based on SOP SPMS date on 1 August 2020. SOP has outlined the request & response, consultation & communication and complaint & grievance mechanism in order to handle issues highlighted by stakeholders. Mill assistant Manager who are responsible handling related to social issue, as per appointment letter date on 01.03. 2019.

Based on complaint and Grievance flow chart show that company will address complaint within 14 Days from the date of complaint. There is no specific complaint from stakeholder sighted in mill and Estate and this was cross verified with workers interview in mill and estate that they mentioned no any grievances raised.

The visited certification unit maintained affirms that its dispute system is open to any affected parties. Relevant document such as whistleblowing policy has specified that the management is committed to help all stakeholders raise concerns, without fear of retaliation, on any wrongdoing that they may observed.

Relevant document suchlike whistleblowing policy has specified that the management is committed to help all stakeholders raise concerns, without fear of retaliation, on any wrongdoing that they may observed. The policy also has alleged that the anonymity of complainants will not be revealed to anybody or third party. The communication however can be voice out through established channels such as complaint box, grievance and complaint book, workers appointed representative.

Status: Comply

**4.3 The unit of certification contributes to local sustainable development as agreed by local communities.**

4.3.1	
Management has taken part in social responsibility by receiving an industrial visit from Sekolah Kebangsaan Keledok students on and providing FFB grading training to MPOB personnel. Mill has given 10kg rice to all workers 2-month once.	
Status: Comply	
4.4	
Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	
4.4.1, 4.4.2, 4.4.3, 4.4.4, 4.4.5, 4.4.6	
No new planting observed. No communities nor individual has any implications for the legal status of their land or have been disputes. The POM is on the land of Bukit Puteri Estate and therefore no legality issues on land ownership. Seen the land titled reference number and quit rent was paid by the Bukit Puteri estate and the copy kept by mill as well.	
Status: Comply	
4.5	
No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	
4.5.1, 4.5.2, 4.5.3, 4.5.4, 4.5.5, 4.5.6, 4.5.7, 4.5.8	
There is no evidence of land extension nor new actuation since from previous audit.	
Status: Comply	
4.6	
Any negotiations concerning compensation for loss of legal, customary or user 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.	
4.6.1, 4.6.2, 4.6.3, 4.6.4	
There is no land dispute in the visited estate as the land belongs to SDP Berhad and land ownership documents verified for evidence.	
Status: Comply	
4.7	
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	
4.7.1, 4.7.2, 4.7.3	
There is no land dispute in the visited estate as the land belongs to SDP Berhad and land ownership documents verified for evidence.	
Status: Comply	
4.8	
The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	
4.8.1, 4.8.2, 4.8.3, 4.8.4	
There is no land dispute in the visited estate as the land belongs to SDP Berhad and land ownership documents verified for evidence.	
Status: Comply	
<b>PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION</b>	
5.1	
The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	

**5.1.1, 5.1.2, 5.1.3, 5.1.4, 5.1.5, 5.1.6, 5.1.7, 5.1.8, 5.1.9**

Current and previous period prices paid for FFB are publicly available and accessible by OCP. MPOB monthly average price clearly stated in the monthly self-billed invoice for OCG. Payment to OCP checked and found all payment performed according to agreed term in the contract.

OCP Supplier Meeting & Crop Quality Awareness Clinic conducted by involving all supplier and OCP. Relevant briefing given to all OCP on grading process and other relevant issues. General briefing conducted according to general SOP. Feedback from supplier and OCP are very positive with all registered supplier attended the briefing. FFB Supply Contract observed available between China Engineers Malaysia and supplier.

Legal contract observed where original signature observed. Contract renewed on yearly basis. All OCP observed with contract bounded. Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. Payment receipt date will be generated upon the payment released. Payment receipt for specific OCP observed. Weighing bridge used as weighing machine at mill observed with valid Calibration certificate.

General Grievance handling SOP available including supplier issue and documented into SOM appendix 5.5.3.2 Procedure for external communication. Proper flow developed for grievance handling. No grievance between with supplier reported.

Status: Comply

**5.2**

**The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.**

**5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.5**

There is no scheme smallholder under SOU 10 Bukit Puteri POM.

Status: Comply

**PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS**

**6.1**

**Any form of discrimination is prohibited.**

**6.1.1, 6.1.2, 6.1.3, 6.1.4, 6.1.5, 6.1.6**

Equal opportunity policy was established by the group of company. The company is strictly insisted that all employees should be treated fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and/or age. The company is committed to work with all relevant stakeholders to protect and promote the wellbeing of all persons within their sphere of influence.

In the mill there are two nationality India and Indonesia, based on offer letter and payment slip sighted salary are in equal same. Workers selection hiring selection for foreign and local sighted in SOP (WMU/LR/SUPP/March 2016) sighted has been mention requirement based on skills, capabilities, qualities and medical fitness necessary for the jobs available. Pregnancy test performed by the worker itself at outsider clinic or hospital. The result will be submitted to estate management just for monitoring purpose and reallocation of work shall be done if necessary. Pregnant women are prohibited and not allowed to involve in any chemical activity such as sprayer etc.

Seen the gender committee minute of meeting done with attended by 23 representatives. The meeting has discussed pertaining sexual harassment, pregnancy women, safety and health in a workplace, social etc. Interview with Gender Committee member has been informed that no harassment cases been raised by the workers so far based on minute. The workers are treated equally. Contract agreement has stated no difference privilege given to local and foreign workers.

Status: Comply

**6.2**

**Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).**

**6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7**

Employment contracts were available in language that understood by workers. The contract has detailing the payments whereas the employment conditions such as period of working, working hour, medical assistance, holiday and annual leave, termination of services etc. The contract was brief to the workers before the workers signed their contracts. Employment contract stated the offered position, wages implied, working hours, OT, allowances, rest day, working on holiday etc.

This contract is signed by both employee and employer and accompanied with respective witnesses. Workers employed are local and Indonesian workers. Seen the deduction performed by the management only for electricity, NUPW and water. The deduction was made according to letter issued from JTK Semenanjung Malaysia. The workers master list has developed containing full name, gender, date of birth, joining date, job designation, nationality and period of employment.

Working hour has been offered according to regulation which is not more 12 hours a day inclusive of 4 hours overtime and not exceeding 104 hours a month. POM and mill have established punch card recording system to monitor working hour and overtime of their employees. There are sighted that based on the agreement for minimum salary there are two difference version has been sighted.

Minimum Salary for town area is RM 1200 and Rural area is RM 1100.sighted in Contract. There are sample sighted in the agreement has mention Minimum salary are 1200 however based on pay slip is calculated as salary RM1100, also there are sighted, no clear term for afternoon casual work.

Weekly inspection was carried out by Medical Assistance and the inspection was covered a cleanliness, communicable disease control, drainage system, lavatory & sewerage system, housing compound, road safety, water and electricity supply and etc.

The latest inspection form was sighted conducted on 10/09/2020. The price was regularly monitored by the management. The workers also possible to obtain their needs from nearest town located at Kuala Lipis approximately 30 km or 30 minutes travel. Interview with the workers confirmed the selling price in both shop in estate and town were affordable.

The company practices the monthly wages payment on or before 07<sup>th</sup> of every month. This was verified with workers during site visit and found positive. Interviewed with SDP - Sustainability Regional PIC reveals SDP had done a study on 02/04/2020 on decent and fair wages that a collaboration with Monash University, United Plantations Berhad, Sime Darby Berhad and IOI Berhad.

This study was attempted to apply the Global Living Wage Coalition's Anker Method. The study outlines the core topics Living Wage Benchmark (food costs, housing, non-food non-housing, living wage calculation), Site Visits (food, housing, in kind benefits, estimating prevailing wages) and Foreign Workers (agents, gains for migrant workers).

The elements calculated for the prevailing wages with macro view on In Kind benefits that includes on housing (cost of building, service life of per house, annual maintenance, number of houses) that gives Total Cost of Housing", total cost of electricity & water, total cost of education (only for local), total cost of creche (only for local) and total cost of healthcare.

The calculation of prevailing wages has initiated by taken annual income of local and foreign into average, for local is RM 1573.45 and for foreigners is RM 1709.05. The figures reckoned as achievable amount. Both estate and mill does not engage casual or temporary workers in their operation but only utilizing full time workers for all core work such as harvesting, spraying, manuring etc.

**Major NC No. 2020.01: Bukit Puteri Estate:**

As per Minimum Wage Order 2020 which came into effect 01/02/2020, providing for minimum wages set at RM 1200.00/month or RM 5.77/hour for those workers paid at hourly rate and for rural area is RM 1100/month. Bukit Puteri Estate region does not fall in urban area and therefore RM 1100/month is applicable. However, sample sighted for foreign worker's extension of employment agreement stated minimum salary is RM 1200/month but wages appear in worker's pay slip is calculated based on RM 1100/month. Aside, there is no clear terms available for the work type "Afternoon Casual Work" for works carried out after normal working hours at which the workers are paid on piece rated that violating clause "Working Hours" in Letter of Appointment stating "Overtime means work done after your normal working hours". This was cross verified against "Borang Permohonan" from Field Supervisor to Manager which dated on 10/01/2020 which is also ticked on piece rated.

6.2.2	Status: Non-Conformity No. 2020.02 with Major category	
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**6.3**  
**The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.**

**6.3.1, 6.3.2, 6.3.3**  
 The company has established a statement through the policy of Social in recognizing the rights of employees to freedom of association. They were allowed to join any trade union such as NUPW National Union of Plantation Workers. From the last lines of the policy states the commitment of the company to respect the rights of all personnel to form and join trade unions of their choice and to bargain collectively.  
 They were also allowed either to join or form any association and bargain collectively with the employer as stipulated in the contract of employment. Interviewed the foreign workers (sprayers, tractor driver and Mandore) and local office staff reveals that, local workers are very common being the member but for foreigners it depends on their own judgement, which always ending 1% - 2% from total foreign work force which mainly due to their concern of paying monthly fee. He said the management does not involve in workers freedom to join the Union.

	<b>Status: Comply</b>	
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**6.4**  
**Children are not employed or exploited.**

**6.4.1, 6.4.2, 6.4.3, 6.4.4**  
 Child protection policy was established and been revise date on Jan 2020, and advocate for the safety and well-being of children. The company also committed to comply with all relevant local and international laws and standards. The age screening procedure of Liaison and Recruitment (LR) with reference WMU/LR-SOPP/March 2016 dated 30/3/2019 has established.  
 The procedure has stressed out the process during workers recruitment and age screening will be carried out at every stages of recruitment process. The management has demonstrated the recruitment process according to their SOP such if the workers obtained from labor source country, the recruitment team and agent prior do the age screening before proceeding to medical check-up and next process.  
 Company has classified Hazardous and Non-Hazardous operation. Child labour policy has been communicated to all affected parties inclusive of internal and external stakeholders such as staff, contractor, supplier, government authority etc during stakeholder consultation meeting conducted in all respective certification units. The management has stressed out that no child labor is allowed and the company will never compromise and stringent action will be taken to that ignorance.

	<b>Status: Comply</b>	
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**6.5**  
**There is no harassment or abuse in the workplace, and reproductive rights are protected.**

**6.5.1, 6.5.2, 6.5.3, 6.5.4**  
 The company has established two (2) polices which related to female affairs as to prohibit any form of sexual and all other forms of harassment and violence. Both which was social and gender policies were signed by Mohamad Helmy Othman Basha, in December 2020 were documented and publicly published at the office, muster board/ roster and implemented and communicated clearly to all levels of the workforce during gender committee meeting, programs and also during morning muster briefing.  
 Based on the gender committee handbook, the meeting is to be conducted every quarterly. Last conducted in 20 July 2020. Management has established a social and humanity management policy signed by the group managing director, the policy affirming its commitment to prevent sexual harassment and other forms of violence against women and protect their reproductive rights.  
 There are no new mothers in Mill. No assessment has been conducted however there are sighted policy and SOP for assessing new mothers. SDP Group has developed Code of Business Conduct and procedure for internal & internal communication system. The objective of the procedure is to provide a formal and transparent platform for its employees



to air their grievance, complaints and report. The methods of raising complaints are channel to various such as via hotline number at 1800 88 8880.

The written grievance also can be dropped at respective office or whistleblowing unit in SDP's headquarters. The company will take all necessary steps to protect the identity of the complainant and/or victim of sensitive cases. The company has also established a whistleblowing policy and report shall be made through options given as such above or whistleblowing e-form available at SDP official website. The policy insists that whistleblowers who voluntarily come forward to report or reveal information on grievance, complaint or report activities, the identity of whistleblower and the information provided are kept confidential from any party.

Status: Comply

**6.6  
No forms of forced or trafficked labour are used.**

6.6.1, 6.6.2

The management has acquired legal workers with permit from Immigration Department. The passport was kept by individual worker and no retention of identity documents been practiced. All costs incurred during recruitment process were borne by the management itself consisting of transportation, medical, passport and levy cost.

All workers have a right to resign at any time as stipulated in contract agreement and no penalty for termination of employment been imposed. Based on the record sighted 4 foreign workers are not available in the list of process of permit renewal. This was cross verification through worker interviewed was confirmed that they kept their passport by themselves and no requirement to return it to management. They return their passport just for renewal process and will be returned back by management as soonest when permit is done.

Status: Comply

**6.7  
The unit of certification ensures that the working environment under its control is safe and without undue risk to health.**

6.7.1, 6.7.2, 6.7.3, 6.7.4, 6.7.5

The responsible person for safety and health has been appointed through letter dated 17<sup>th</sup> July 2020 issued appointing the manager, En Hairie Hazali is responsible for Safety and Health matters. for Estate Mohamad bin Ishak estate manager. The regular meeting has been recorded. The latest meeting was conducted on 20<sup>th</sup> July 2020 for mill and 2.09.2020. The matter discussed was mainly on safety and health in mill area. All OSH related issues raised from all parties were recorded with attention of mill manager and deadline.

Seen the raised issue pertaining to JKKP visit recently related to working in confined space and recommended to prepare proper SOP and complied with the requirement such as AESP&AGTES. There is no accident happen for 3 months for mill and estate. Workers were provided with medical care.

During mill visit, found the signages for high noise area, slippery area and evacuation route maps are well displayed. Aside, the mill has a floor plan shows arrows that indicating direction to emergency assembly area. During visit to engine room, sterilizer station and water treatment plant, the first aid boxes were verified of the contents and found tally with the item list stucked on the box.

The workers can get their treatment at estate clinic without any cost be imposed. All workers also been covered with Social Security Organization (SOCSO) which provides protection to employees against accidents or occupational diseases arising out of and in the course of their employment. The benefits covering medical, temporary disablement, dependents, rehabilitation facilities, funeral benefit etc.

Seen the medicines issuance records in all certification units attended with their HA. Workers interview confirmed that medical care was provided to them without be charged at any cost. Records of incident and accident were available reference to JKKP form 8. Records on Lost Time Incident (LTI) metrics had been verified as below 19368manhours without accident.

Site visit to pesticide store, chemical store, schedule waste store, PPE storage area, pre-mixing area and worker's shower room found adequately maintained. The auditor observed the workers PPE are being keep safely and clean before the

workers leaving to their worker's quarters. Interviewed with sprayers and manurers at line site found they are aware on the procedures.

Status: Comply

**PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT**

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

7.1.1, 7.1.2, 7.1.3

IPM plan available for estate Bukit Puteri with relevant type of beneficial plant (Cassia Cobanensis, Antigonon leptopus, Turnera Subulata, Euphorbia heterophylla). Barn owl house also erected for fighting of rat at estate. IPM plan program for year 2020 observed with separation to field number. No species in the Global Invasive Species Database andCABI.org being used. No fire been used for pest control.

Status: Comply

**7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.**

7.2.1, 7.2.2, 7.2.3, 7.2.4, 7.2.5, 7.2.6, 7.2.8, 7.2.9, 7.2.10, 7.2.11

All pesticides used were according to the recommendation stated in Sime Darby Agricultural reference manual, section 16, weed control. Pesticide usage recorded and found low usage of active ingredients. Use of pesticides show trend of reducing with introduction of IPM program. Usage of rat baiting showed significant reduction with introduction of bawl owl erection.

There is no prophylactic use of pesticides. No use of pesticide that under World Health Organization Class 1A or 1B. Specific personnel assigned for chemical or pesticide handling such as office clerk, spraying supervisor, etc. List of sprayers identified for pesticide process. Several trainings arranged for the sprayer to enhance the chemical handling skills. Proper PPE observed during the site observation.

During site observation, found competence personnel who handle the chemical with relevant handling skill. Good storage condition observed at chemical store. Proper and clear segregation observed at chemical store. Relevant type stored according to layout. Sufficient MSDS available to the chemical store.

All pesticide containers disposed as scheduled waste SW 409. Disposal record dated June 2020 observed to Licensed collector. No Aerial spraying conducted at the moment. Annual medical surveillance for sprayers observed. Health examination record for staff observed and found some sprayer with some findings.

Sufficient follow on medical surveillance observed with some further action in planning. No pregnant mother is allowed to performed spraying and manuring task. This demonstrated thru introduction of Restriction Memo. Child labor policy observed and accessible thru human right charter and onsite briefing.

Status: Comply

**7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.**

7.3.1, 7.3.2, 7.3.3

The waste management plan covers all applicable locations such as workshop, lab, office, septic tank, EFB, etc. Thru site observation, found effective management of waste in place according to management plan. EFB observed transported by appointed transporter and send to estate. Domestic waste sends to landfill at estate. Scheduled waste collected by licensed contractor, relevant inventory report was updated and uploaded into ESSIW.

All disposal records were adequately assessed. Scheduled waste inventory record updated until Sept 2020 observed. Site observation for scheduled waste store conducted and found in good condition. Proper scheduled waste store maintained with good signage and housekeeping.

Person who handle scheduled waste show good understanding on the rules and requirements. No open fire observed

during on-site audit for waste disposal.	
<i>OBS: Bukit Puteri Estate:</i>	
<i>Consideration to maintain the consistency of landfill management to ensure the landfill is always in good condition.</i>	
	<b>Status: Observation</b>
<b>7.4 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</b>	
7.4.1, 7.4.2, 7.4.3, 7.4.4	
From site observation, found manuring practice follow the manual methodology. Foliar and soil analysis conducted on yearly basis. Monitoring result analyzed and makes suggestion for fertilizer usage. EFB application to estate observed as nutrient recycling strategy. During site observation, found EFB mulching activity on going for Field 16C. Fertilizer usage recorded into Fertilizer Bin Card. Transaction record documented according to physical stock exchange. Monthly stock check observed on early of each month and found no discrepancy. Fertilizer is good condition.	
	<b>Status: Comply</b>
<b>7.5 Practices minimise and control erosion and degradation of soils.</b>	
7.5.1, 7.5.2, 7.5.3	
Soil map for Bukit Puteri Estate observed. No marginal and fragile soil available. No replanting on steep slopes observed during the site observation. Slope map observed with no slope > 25 degree observed. No new planting of oil palm on steep terrain.	
	<b>Status: Comply</b>
<b>7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</b>	
7.6.1, 7.6.2, 7.6.3	
No new plantings activity performed at the moment.	
	<b>Status: Comply</b>
<b>7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</b>	
7.7.1, 7.7.2, 7.7.3, 7.7.4, 7.7.5, 7.7.6, 7.7.7	
No new planting on peat as no peat soil available in the Bukit Puteri Estate.	
	<b>Status: Comply</b>
<b>7.8 Practices maintain the quality and availability of surface and groundwater</b>	
7.8.1, 7.8.2, 7.8.3, 7.8.4	
Year 2020 water management plan for Bukit Puteri Mill & estate observed. Different water sources identified, secondary water catchment pond, estate water catchment, scheduled water distribution and Perbadanan Pengurusan Air Pahang. Several contingency plan in place for emergency situation.	
No agricultural activity performed at riparian and buffer zone. The rules are strictly followed by the estate during site observation. Mill effluent treated according to DOE requirements. Monthly report submitted with 6 parameters monitored. BOD result showed within permissible limit. Mill water usage monitored and recorded. Yearly monitoring chart for Bukit Puteri mill observed from Jan – Aug 2020 was between 1.10 – 1.2m <sup>3</sup> /MT of FFB processed against the projected volume of 1.3 m <sup>3</sup> /MT of FFB processing.	
	<b>Status: Comply</b>

**7.9**  
Efficiency of fossil fuel use and the use of renewable energy is optimised.

**7.9.1**

Diesel management plan year 2020 observed for mill and estate. Relevant action proposed for usage reducing to ensure prompt service of genset and vehicles and to conduct routine visual inspection on the vehicle. Diesel usage monitoring chart for year 2020 observed with data updated until Aug 2020. The diesel usage monitoring chart for year 2020 observed with data updated until Aug 2020. Average 0.80L/MT FFB production achieved for Aug 2020.

Status: Comply

**7.10**  
Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

**7.10.1, 7.10.2, 7.10.3**

GHG Emission calculation verified and submitted thru Palm GHG. GHG Emissions reduction incorporated into Pollution Prevention Management Plan. GHG emission reduction planned thru good maintenance of vehicle and effective fuel consumption. Pollutions Preventive Management plan for year 2020 observed for mill and estate. Several pollution sources identified (oil, solid waste, chemical spillage and air pollution). Relevant action plan identified and monitored on periodically (regular vehicle service, effluent being treated and site inspection).

All information and data below can be retrieved from the summary report generated through PalmGHG Calculator.

**Summary of Net GHG Emissions**

Emissions per Product	tCO2e/tProduct
CPO	1.31
PK	1.31

Extraction	%
OER	20.42
KER	4.66

Production	t/yr
FFB processed	77,399.87
CPO Produced	15,804.03

Land use	ha
OP planted area	9594.89
OP planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>9594.89</b>

**Summary of Field Emissions and Sinks**

	<i>Own Crop</i>		<i>Group</i>		<i>3rd Party</i>		<i>Total</i>
	tCO2e	tCO2e /tFFB	tCO2e	tCO2e /tFFB	tCO2e	tCO2e /tFFB	
<b>Emissions</b>							
<i>Land Conversion</i>	37211.11	0.71	22039.99	0.68	0	0	39251.10
<i>*CO2 Emissions from Fertiliser</i>	2373.94	0.05	245.03	0.04	0	0	2618.97
<i>**N2O Emissions</i>	1344.56	0.08	147.63	0.05	0	0	1492.19
<i>Fuel Consumption</i>	312.90	0.01	22.47	0.01	0	0	335.36
<i>Peat Oxidation</i>	0	0	0	0	0	0	0
<b>Sinks</b>							
<i>Crop Sequestration</i>	-35271.17	-0.67	-1933.64	-0.64	0	0	-37204.81
<i>Conservation Sequestration</i>	0	0	0	0	0	0	0
<b>Total</b>	<b>5971.33</b>	<b>0.11</b>	<b>521.48</b>	<b>0.17</b>	<b>0</b>	<b>0</b>	<b>9766.35</b>

**Summary of Mill Emissions and Credits**

	<i>tCO<sub>2</sub>e</i>	<i>tCo<sub>2</sub>e/tFFB</i>
<i>Emissions</i>		
<i>POME</i>	15171.69	0.20
<i>Fuel Consumption</i>	22.04	0.00
<i>Grid Electricity Utilisation</i>	374.49	0.00
<i>Credits</i>		
<i>Export of Grid Electricity</i>	0	0
<i>Sales of PKS</i>	0	0
<i>Sales of EFB</i>	0	0
<i>Total</i>	15568.22	0.20

**Palm Oil Mill Effluent (POME) Treatment**

Divert to compost	0
Divert to anaerobic digestion	100%

**POME Diverted to Anaerobic Digestion:**

Divert to anaerobic pond	100
Divert to methane capture (flaring)	0
Divert to methane capture (electricity generation)	0

Status: Comply

**7.11**

**Fire is not used for preparing land and is prevented in the managed area.**

**7.11.1, 7.11.2, 7.11.3**

No fire used for preparing land for new planting and replanting. Emergency Response and Preparedness SOP and flow chart observed. Good adherence for Fire prevention and control observed. Factory and estate actively connect with BOMBA in handling of emergency response especially for fire accident.

Status: Comply

**7.12**

**Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.**

**7.12.1, 7.12.2, 7.12.3, 7.12.4, 7.12.5, 7.12.6, 7.12.7, 7.12.8**

There is no land clearing occur since November 2005. High Conservation Value (HCV) Assessment report dated March 2016. HCV report for 3 SOUs (Bukit Puteri, Kerdau, Jabor) observed with only HCV 4 & 6 identified. No land clearing and deforestation after 15 November 2005. Integrated management system developed for maintaining HCV 4 & 6.

Status: Comply

3.2 Conformity Checklist of Certificate and Trademark Use

<b>1.</b>	<b>Evidence of permission or approval certificate and logo from Certification Body which submitted by Client</b>	<b>X or ✓</b>
ASA-1.4	Bukit Puteri POM – SOU12 has a certificate of approval numbers No. MUTU-RSPO/92	✓
	Status: Comply	
<b>2.</b>	<b>Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use</b>	<b>X or ✓</b>
ASA-1.4	Bukit Puteri POM – SOU12 does not use the RSPO logo both in the on-product and off-product.	✓
	Status: Comply	
<b>3.</b>	<b>Implementation of Certificate and Logo is not used on product</b>	<b>X or ✓</b>
ASA-1.4	Bukit Puteri POM – SOU12 does not use the RSPO logo both in the on-product and off-product.	✓
	Status: Comply	
<b>4.</b>	<b>Controlling of Certificate and Logo, including withdrawing inappropriate logo.</b>	<b>X or ✓</b>
ASA-1.4	Bukit Puteri POM – SOU12 does not use the RSPO logo both in the on-product and off-product.	✓
	Status: Comply	

**3.3 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 September 2020 by the Head of Sustainability.

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:

- PT Budidaya Agro Lestari waiting for land title process.
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above.

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p><b>Company Group/Holding Statement:</b> Companies are already doing internal audits. There are internal audit reports for each company, latest partial internal audit held in 2019, for five units and three smallholder scheme.</p> <p><b>Auditor Verification:</b> Internal Audit report available for uncertified management unit, latest partial internal audit is held in 2019, for five units and three smallholder scheme.</p>
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<p><b>Company Group/Holding Statement:</b> HCV assessment has been conducted for uncertified units i.e. PT Mitra Austral Sejahtera (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p> <p><b>Auditor Verification:</b> Sime Darby Plantation Bhd sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2<sup>nd</sup> revision on 24 June 2016. Current status of LUCA report of SDP Bhd is having been sent the 19 report of LUCA to RSPO on Aug 2018, responded by</p>



		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.
2.1.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p><b>Company Group/Holding Statement:</b> A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress. *Note: RSPO NPP Announcements for SDP can be found at <a href="http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14">http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14</a></p> <p><b>Auditor Verification:</b></p> <ul style="list-style-type: none"> <li>• Karya Palma Estate (PT Sandika Natapalma) and Baturus Estate (PT Budidaya Agro Lestari) any new planting after January 1<sup>st</sup> 2010 and due to not conduct NPP.</li> <li>• RSPO NPP process has been completed in 2011 for a new mill in Liberia.</li> </ul>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p><b>Company Group/Holding Statement:</b> Sime Darby (Liberia) Plantation Inc. Status: Box G – Close for Monitoring Further details please refer to: <a href="http://www.rspo.org/members/complaints/status-of-complaints/view/46">http://www.rspo.org/members/complaints/status-of-complaints/view/46</a></p> <p><b>Auditor Verification:</b> Auditor has verified the supporting evidence of above the company statement. There are land conflict in: PT Bina Sains Cemerlang, this issue was raised on 22 April 2017 and still being process to resolve.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p><b>Company Group/Holding Statement:</b> No stakeholder comments or complaints received.</p> <p><b>Auditor Verification:</b> Auditor has verified the supporting evidence of above the company statement. There are no labour dispute in company unit.</p>
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be	<p><b>Company Group/Holding Statement:</b> None noted. No stakeholder comments or complaints received.</p>

	<p>Criterion 4.2 in P&amp;C 2018).</p>	<p><b>Auditor Verification:</b>          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"> <li>• PT Sime Indo Agro 1,652 Ha</li> <li>• PT Aneka Inti Persada 421.31 Ha</li> <li>• PT Bina Sains Cemerlang 308.25 Ha</li> <li>• PT Bersama Sejahtera Sakti 765 Ha</li> <li>• PT Langgeng Muaramakmur 1,162 Ha</li> <li>• PT Paripurna Swakarsa 1,120 Ha</li> <li>• PT Swadaya Andika 63 Ha</li> <li>• PT Bahari Gembira Ria 1,639 Ha</li> <li>• PT Guthrie Pecconina Indonesia 4,133 Ha</li> <li>• PT Perkasa Subur Sakti 1,286 Ha</li> </ul>
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**3.4 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.**

**3.4.1. Identification of Findings, Corrective Actions and Observations at ASA 1.3**

NCR No.	: 2019.01	Issued by	: Ebnu Holdoon
Date Issued	: 27 <sup>th</sup> April 2019	Time Limit	: ASA-1.4
NC Grade	: Minor	Date of Closing	: 18 September 2020
Standard Ref. & Requirement	<p>Minor 5.1.2: Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive action plan. The action plan shall identify the responsible person/persons.</p>		
<p><b>Non-Conformance Description &amp; Evidence observed (filled by auditor)</b></p> <p>During the field visit at the workshop at Bukit Puteri, it was observed that:</p> <ul style="list-style-type: none"> <li>i) Lubricant Mineral Oil spillage and grease residual waste found at the backyard of the workshop parking bay</li> <li>ii) 3 tractors had been parked outside the servicing bay area without containment and the lubricant spillage was found on the ground</li> </ul> <p>This is nonconformity against indicator 5.1.2 stating that Bukit Puteri Estate does not cover the implication of potential impact from the current practices in the workshop in order to mitigate negative effects being occurred.</p>			
			
<p><b>Root Cause Analysis (filled by organization audited):</b> In-sufficient training on workshop maintenance and schedule waste management.</p>			
<p><b>Corrective Action (filled by organization audited):</b></p> <ul style="list-style-type: none"> <li>1) Using a proper tool (Wheelbarrow) to bring the used oil into the Schedule Waste Storage.</li> <li>2) Purchase additional tray.</li> </ul>			
<p><b>Preventive Action (filled by organization audited):</b> Educate the driver, workshop attendant, foreman on the lubricant handling and workshop maintenance.</p>			
			

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

18 September 2020

During visit to workshops and schedule waste stores in mill and estate, found no traces of oil leakage, lubricant spillage nor improper storage of chemicals. Interviewed with respective sites in-chargers who mentioned that a specific training session was conducted for chemical and schedule waste handling. Therefore, the minor non-conformity is closed.

Verified by : Yap Chin Hung

NCR No.	: 2019.02	Issued by	: Mahas
Date Issued	: 26/04/2019	Time Limit	: ASA 1.4
NC Grade	: Minor	Date of Closing	: 18 September 2020
Standard Ref. & Requirement	6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and those efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.		

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

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

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

Lack of personal hygiene awareness among the workers.

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

To conduct and document on "Kempen Hari Kesehatan dan Kebersihan" among the workers.



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

Annually conduct on "Kempen Hari Kesehatan dan kebersihan" among workers.

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

18 September 2020

During visit to worker's quarters, interviewed foreign workers on site at estate and mill found they are aware on the issues that mentioned by panel doctor. The respective management (Medical Assistant) continuously monitoring the hygiene factors. Aside, it being includes in the CIP. Therefore, the minor non-conformity is closed.

Verified by : Mohd. Rizal

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA 1.4

NCR No.	: 2020.01	Issued by	: Mohd. Rizal bin Md. Kassim (RK)
Date Issued	: 19 September 2020	Time Limit	: 18 December 2020
NC Grade	: Major / Critical	Date of Closing	: 02 October 2020
Standard Ref. & Requirement	<p>6.2.2            Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p>		
<p><b>Evidence observed</b> (filled by auditor):  <b>Bukit Puteri Estate:</b>            As per Minimum Wage Order 2020 which came into effect 01/02/2020, providing for minimum wages set at RM 1200.00/month or RM 5.77/hour for those workers paid at hourly rate and for rural area is RM 1100/month.</p> <p><b>Non-Conformance Description</b> (filled by auditor):            Bukit Puteri Estate region does not fall in urban area and therefore RM 1100/month is applicable. However, sample sighted for foreign worker's extension of employment agreement stated minimum salary is RM 1200/month but wages appear in worker's pay slip is calculated based on RM 1100/month. Aside, there is no clear terms available for the work type "Afternoon Casual Work" for works carried out after normal working hours at which the workers are paid on piece rated that violating clause "Working Hours" in Letter of Appointment stating "Overtime means work done after your normal working hours". This was cross verified against "Borang Permohonan" from Field Supervisor to Manager dated on 10/01/2020 which is also ticked on piece rated.</p>			
<p><b>Root Cause Analysis</b> (filled by organization audited):            Lack of verification process in the documentation process. Unavailability of standard/guideline leads to misinterpretation of the term used in the payroll system.</p>			
<p><b>Correction</b> (filled by organization audited):            To review all the affected foreign worker employment contract and replace with the correct appendix. To seek clarification/advice from the related department on the guideline for data entry process.</p>			
<p><b>Corrective Action</b> (filled by organization audited):            To ensure the document which related to worker employment are thoroughly verified before signing. To ensure data entry process follows the guideline or written communication instructed by HQ.</p>			
<p><b>Assessor Evaluation and Conclusion</b> (filled by auditor):            2 October 2020            Based on the desk verification of the addressed corrective actions, a phone conversation was done by LA with Regional Sustainability Executive to further clarifications of corrective actions. Since, the estate and mill has done 100% screening of the workers employment agreement and correction had made with concern from workers. Therefore, this finding closed and the effectiveness of corrective action will be verified in next assessment.</p>			
Verified by	: Mahaswaran Maliyapan		

**3.4.3. Opportunity for Improvement**

No	Ref. Std.	Description
1	7.3.2	<b>Bukit Puteri Estate:</b> Consideration to maintain the consistency of landfill management to ensure the landfill is always in good condition.
2	2.1.1	<b>Bukit Puteri POM:</b> License for water source – SWUL/LPSA/58/2019, water extraction from Sungai Sertang, Batu Yon Lipis. The license expired on 31/12/2019, however a letter dated 19/12/2019 from “Pejabat Setiausaha Kerajaan Pahang” stating renewal process are stop till further notice.

**3.4.4. Noteworthy Positive Components**

No	Ref. Std.	Description
1	3.7.1	The OSH awareness among workers interviewed in estate and mill, annual training programs for all level of workers and budget allocation for continuous improvement activities in regards to OSH implementation seen well implemented.
2	2.1.1	Interviewed with foreign and local workers found, they are aware and strictly complying to SOPs on Covid – 19 and the estate and mill management regularly inspect their workers movement.



**3.5 Summary of Arising Issues from Public and Auditor Verification**

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Estate and Mill foreign workers:</b></p> <p>The interviewed workers mentioned they are being treated equally among all different nationalities. The monthly salary received is always higher than the basic minimum wages and pay through bank before 7<sup>th</sup> every month. There is no conflict ever happened between workers &amp; estate or mill management.</p>	<p>No negative comments. However, due to Covid 19 Pandemic the estate and mill always ensure the safety and health risks before assigning daily jobs.</p>
<p><b>Estate and mill field staff:</b></p> <p>PPEs to workers are given without charges even for replacement or worn out PPEs. Female staff, mentioned no sexual harassment and domestic violence within estate and mill worker's family. All collectively agreed of no discrimination based on gender, races and nationality.</p>	<p>Positive comments</p>
<p><b>All level of workers includes Security Personals:</b></p> <p>The local and foreign workers appreciate the effort taken by estate and mill management to provide rations / groceries during Covid 19 as they were unable to go out from the line site as precatory measures. The continuous monitoring and updates by the respective management with supply of free face musk made the workers safe stay.</p>	<p>Positive comments</p>
<p><b>Gender Committee (Combined mill and estate)</b></p> <p>The committee chairwoman mentioned, there isn't any social issues with presence of foreign workers. The estate and mill management always encourage the committee to reach out all level of female workers and their dependents. No records of sexual harassment and gender discrimination.</p>	<p>Bukit Puteri mill and estate management will continue to give cooperation towards gender committee.</p>
<p><b>Workers Union Representative (Bukit Puteri Estate)</b></p> <p>The workers representative had been interviewed and he mentioned the foreign worker's subscribing to Union is largely based on their respective nationalities and the company never restrict them. Very good support from the manager in conducting meeting and provide facilities.</p>	<p>Bukit Puteri Estate will continue to give cooperation towards workers union and will keep monitoring the participation of foreign workers.</p>
<p><b>Workers and Staff (Bukit Puteri Estate)</b></p> <p>Local Medical Assistant &amp; Office Staff, India and Bangladesh workers were interviewed and they collectively agree the estate management no discriminating them in any forms. There isn't any pay violation against the employment contract. No forced overtime and work on rest day. Medical facilities are for workers as well for their dependents.</p>	<p>Bukit Puteri Estate will continue to give cooperation towards worker's benefits and social amenities.</p>
<p><b>Workers (Bukit Puteri Mill)</b></p> <p>The interviewed workers are happy with the management and really appreciated their contribution during Covid-19 initial days by providing sufficient foods and basic necessities. There isn't any accident among mill workers.</p>	<p>Bukit Puteri Mill will continue to give cooperation towards worker's needs and maintaining the fortnightly visits to line sites.</p>



Public Issues (Institution/ NGO/Community)	Auditor Verification
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 style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;"> <p>SOU 10 Bukit Puteri POM Management Representative</p>  <p><b>MOHD AERMAN BIN AHMAD</b> Manager</p> <p>Friday, 02 October 2020</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><b>Mahaswaran Maliyapan</b> Friday, 02 October 2020</p> </div> </div>

**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	<ul style="list-style-type: none"> <li>• 1 x Medical Assistant</li> <li>• 1 x Store Clerk</li> <li>• 3 x general worker – India</li> <li>• 2 x general worker - Bangladesh</li> </ul>	Bukit Puteri Estate	0193808217	Interviewed	18/09/2020	✓	
2	<ul style="list-style-type: none"> <li>• 1 x Local Boilerman</li> <li>• 1 x Indonesian Kernel Plant</li> <li>• 1 x Local weighbridge operator</li> <li>• 1 x local ETP staff</li> <li>• 1 x Local Grader</li> </ul>	Bukit Puteri Mill		Interviewed	17/09/2020	✓	
3	Gender Committee Chief Clerk (Mill) Local Office Clerk	Bukit Puteri Estate Bukit Puteri Mill		Interview	18/09/2020	✓	
4	Workers Union Representative	Bukit Puteri Estate		Interview	18/09/2020	✓	

**Appendix 2. Assessment Program**

DATE	17 to 19 September 2020	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Thursday, 17 September 2020</b>		
08:00 – 09:00	<p>Centralize Opening Meeting at <b>Bukit Puteri POM</b></p> <ul style="list-style-type: none"> <li>• Presentation by the manager/coordinator</li> <li>• Presentation by Lead Auditor.</li> </ul> <p>Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation – where applicable).</p>	MM, RK, YC
09:00 – 13:00	<p><b>Bukit Puteri POM</b></p> <p><b>Document Audit:</b> Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</p> <p><b>Mill inspection:</b> Workshop, Laboratory, Environment, OHS, Chemical Stores, Workers Welfare and Interview, Clinic, Landfill, Mill Housing, Biogas System (if applicable), WWTP, Schedule Waste and POME.</p>	MM, RK, YC
13:00 – 14:00	<b>Lunch</b>	MM, RK, YC
14:00 – 16:30	<p><b>Continue document review in Bukit Puteri POM</b></p> <p>Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</p>	MM, RK, YC
16:30 – 17:00	<p>Verify any outstanding issues, auditor discussion and end of audit for day 1.</p>	MM, RK, YC
<b>Friday, 18 September 2020</b>		
08:00 – 13:00	<p><b>Bukit Puteri Estate</b></p> <p><b>Document Audit:</b> Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</p> <p><b>Estate Visit:</b> Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc.</p>	MM, RK, YC
13:00 – 14:00	<b>Lunch</b>	MM, RK, YC
14:00 – 16:00	<p><b>Continue document review in Bukit Puteri Estate</b></p> <p>Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</p>	MM, RK, YC
16:00 – 17:00	<p>Verify any outstanding issues, auditor discussion and end of audit for day 2.</p>	MM, RK, YC

Saturday, 19 September 2020		
08:00 – 10:00	<b>Bukit Puteri POM and Bukit Puteri Estate documentation:</b> verify any outstanding issues, basic information data, GHG verification	
10.00 – 11.00	<b>Auditors discussion:</b> finalizing findings and prepare for centralize closing meeting at Bukit Puteri POM	
11.00 – 12.00	<b>Closing meeting:</b> Chaired by the audit Lead Auditor <ul style="list-style-type: none"> <li>• Welcome and introduction by the Lead Auditor</li> <li>• Presentation of findings by the audit team</li> <li>• Questions &amp; answers and Final summary by Lead Auditor</li> </ul>	
12.00	<b>End of assessment</b>	