

Roundtable on Sustainable Palm Oil Certification
R S P O

[✓] Surveillance 1.4

Name of Management Organisation : Kok Foh Palm Oil Mill – SOU 16 subsidiary of Sime Darby Plantation Berhad

Plantation Name : SOU 16 – Kok Foh Estate, Sg. Senarut Estate, Muar River Estate, Pertang Estate, Bukit Pilah Estate, St. Heiler Estate and Sg. Sabaling Estate

Location : 72109 Bahau, State of Negeri Sembilan, Malaysia

Certificate Code : **MUTU-RSPO/093**

Date of Certificate Issue : 07th July 2016 Date of License Issue : 29th Nov 2020

Date of Certificate Expiry : 06th July 2021 Date of License Expiry : 06th July 2021

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA 1.4	07 to 10 September 2020	Mohd Fadzli Bin Bistamam (Lead Auditor); Mohamad Razin bin Bakal; Ismadi bin Ismail	Eileen Chiang	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA 1.4	9 October 2020

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Figure 1. Location Map of SOU – 16 Kok Foh

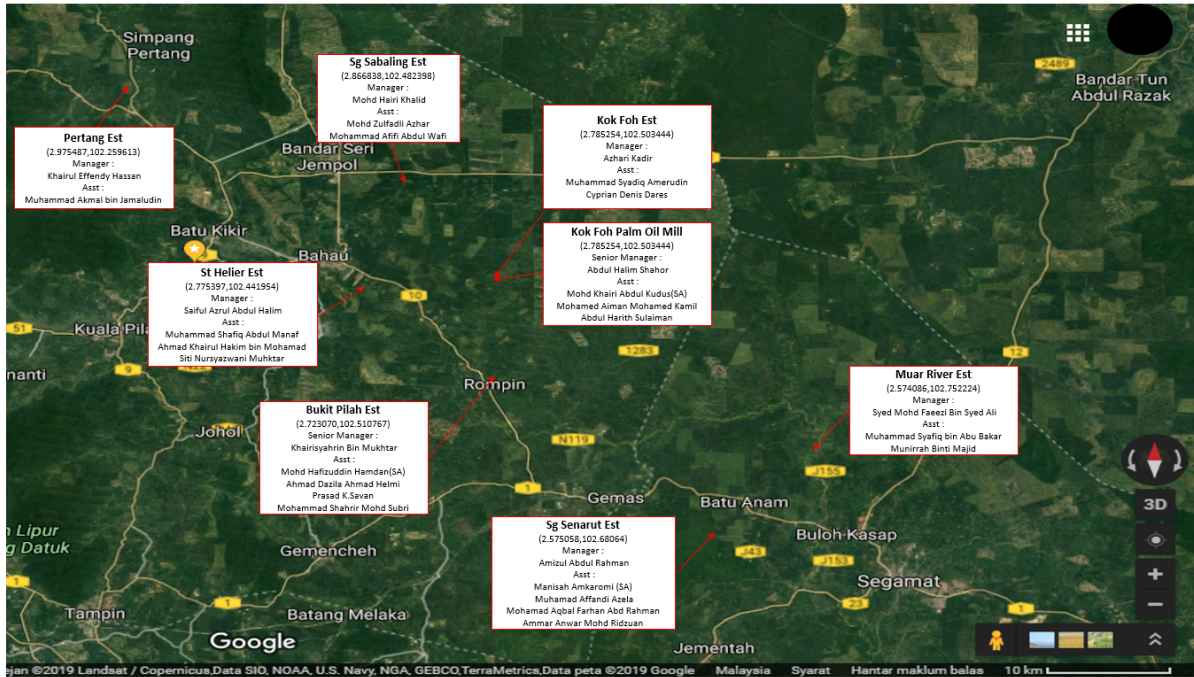


Figure 2. Operational Map of SOU – 16 Kok Foh Estate

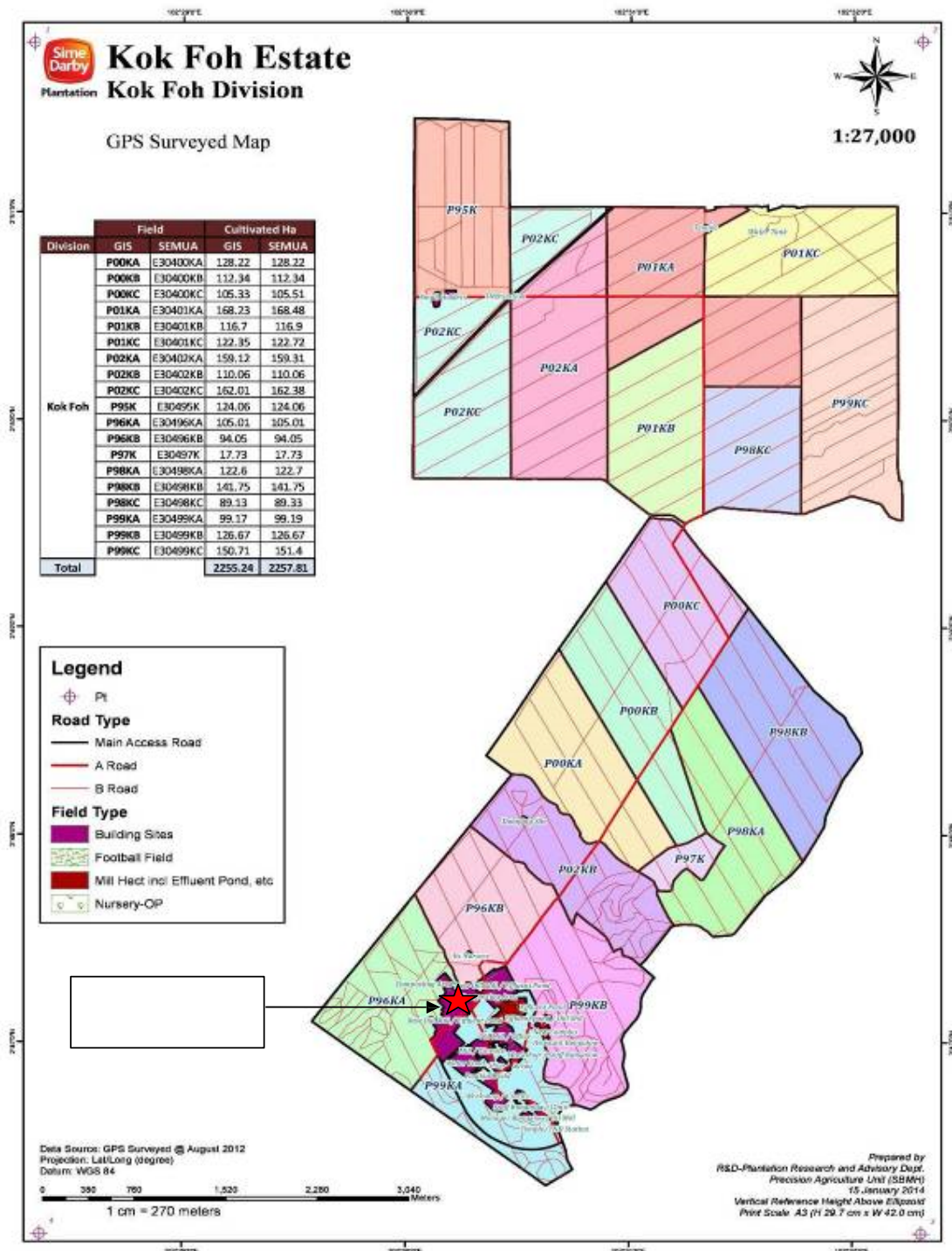


Figure 3. Operational Map of Sg. Senarut Estate and Sg Sabaling Estate

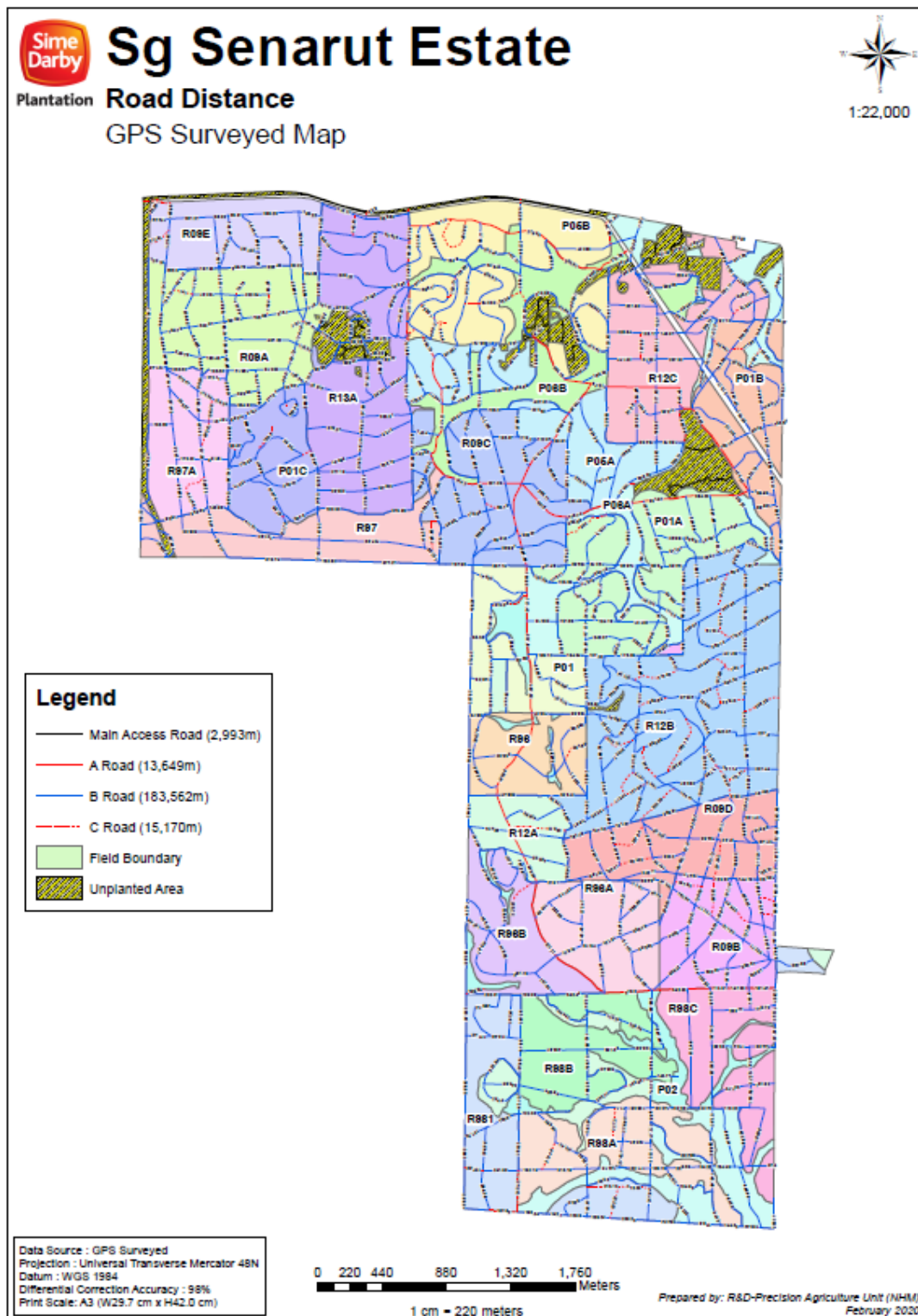


Figure 4. Operational Map of Muar River Estate

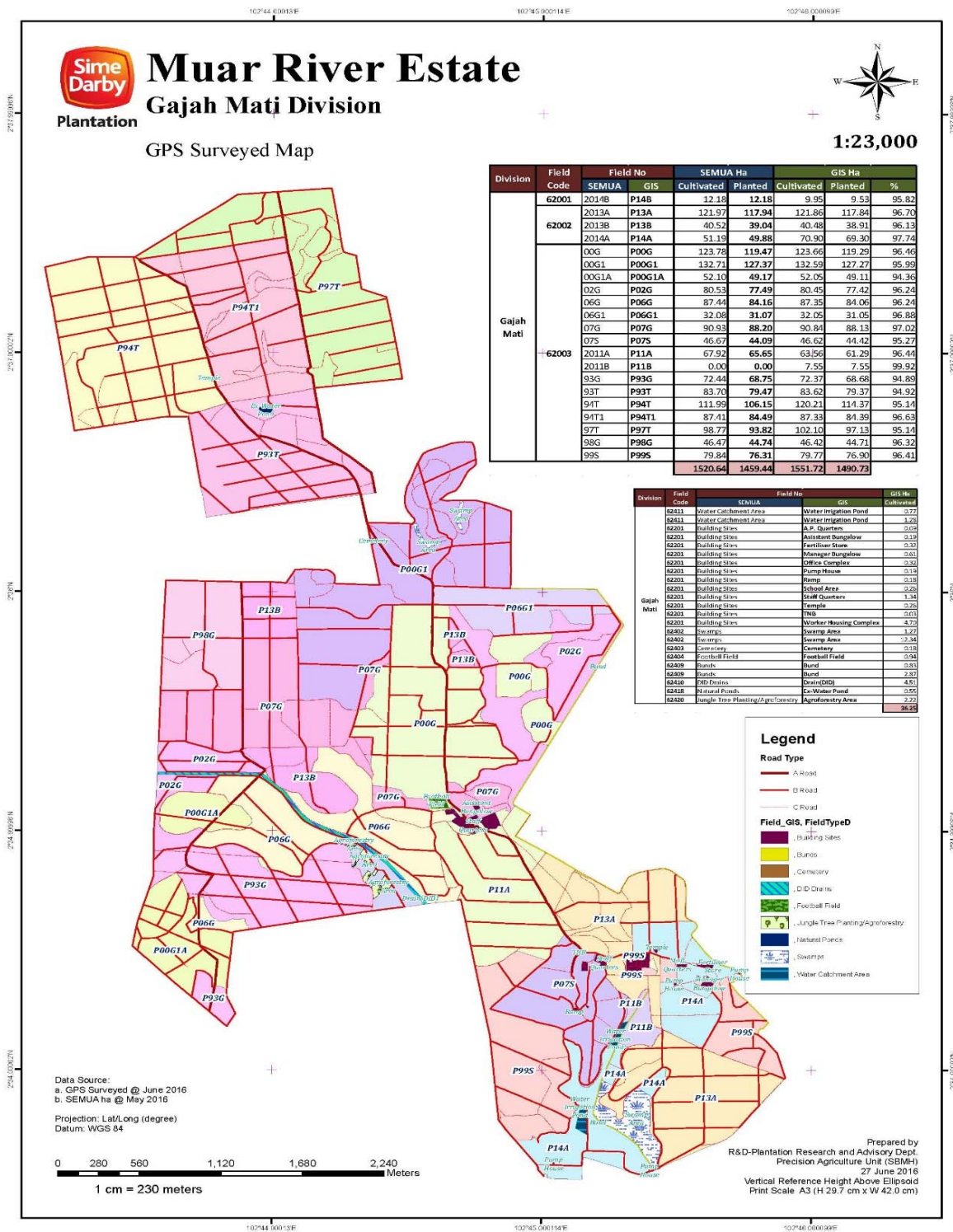


Figure 5. Operational Map of Pertang Estate

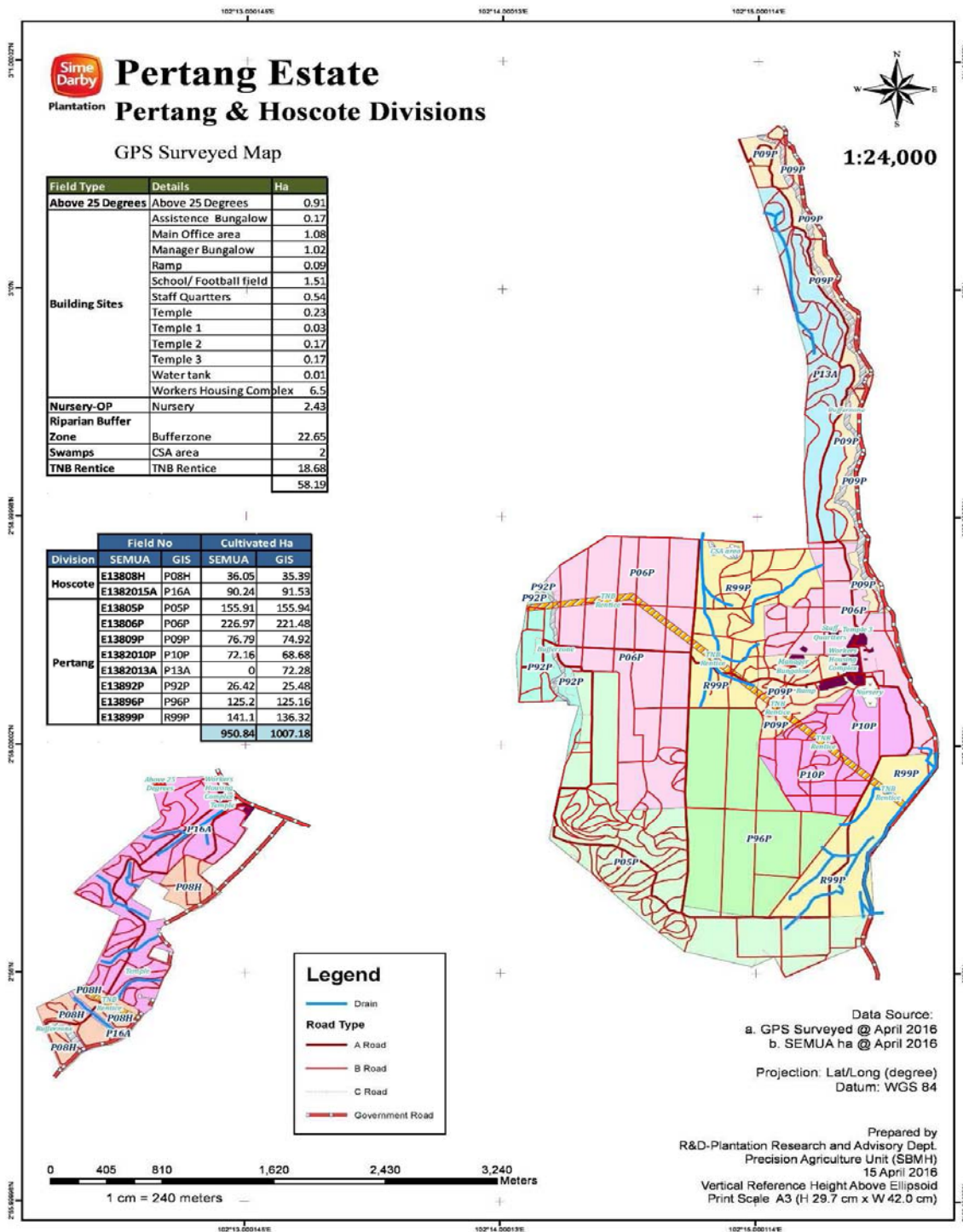


Figure 6. Operational Map of Bukit Pilah Estate, Kelpin & New Rompin Divisions

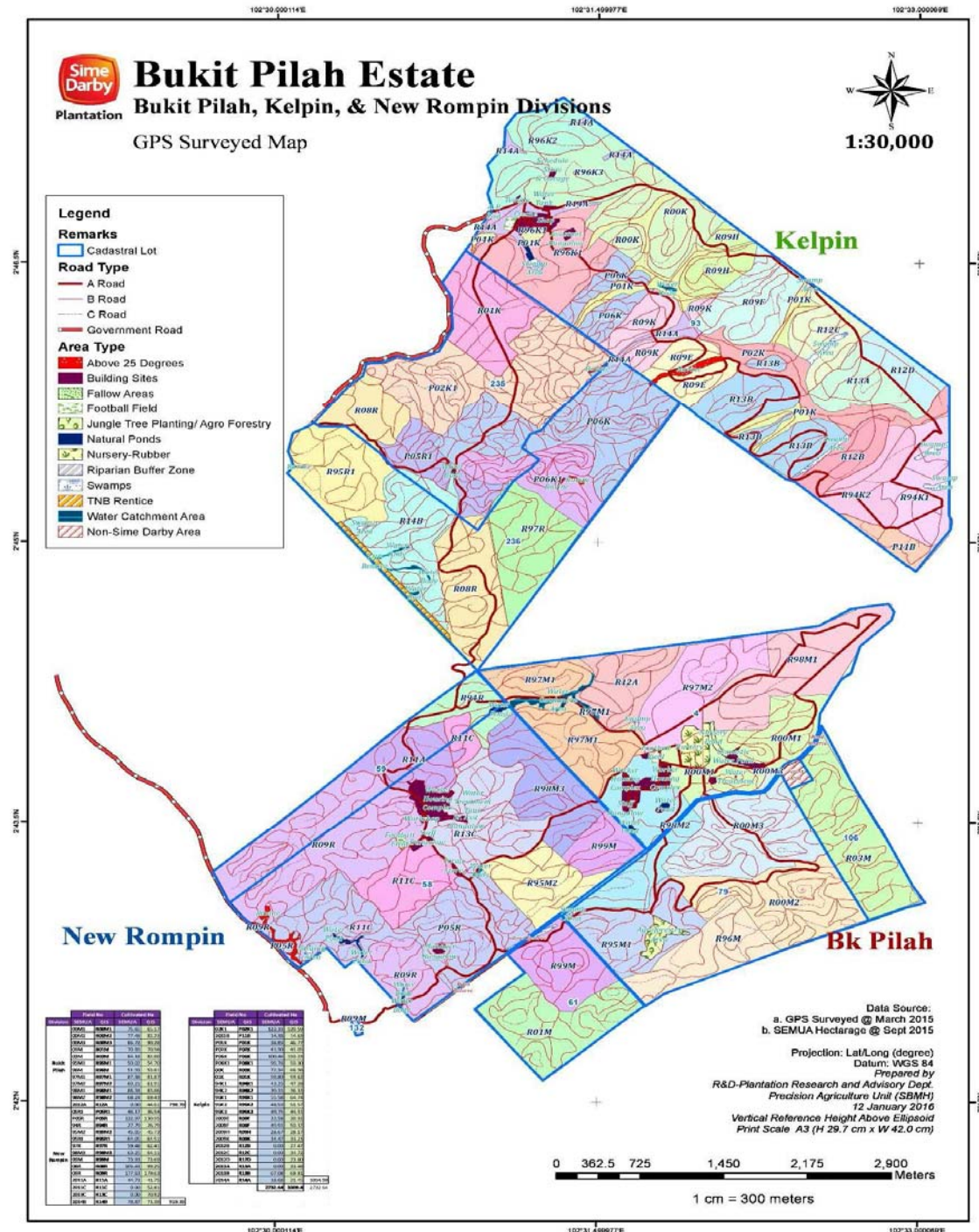


Figure 7. Operational Map of Sg. Kelamah Division

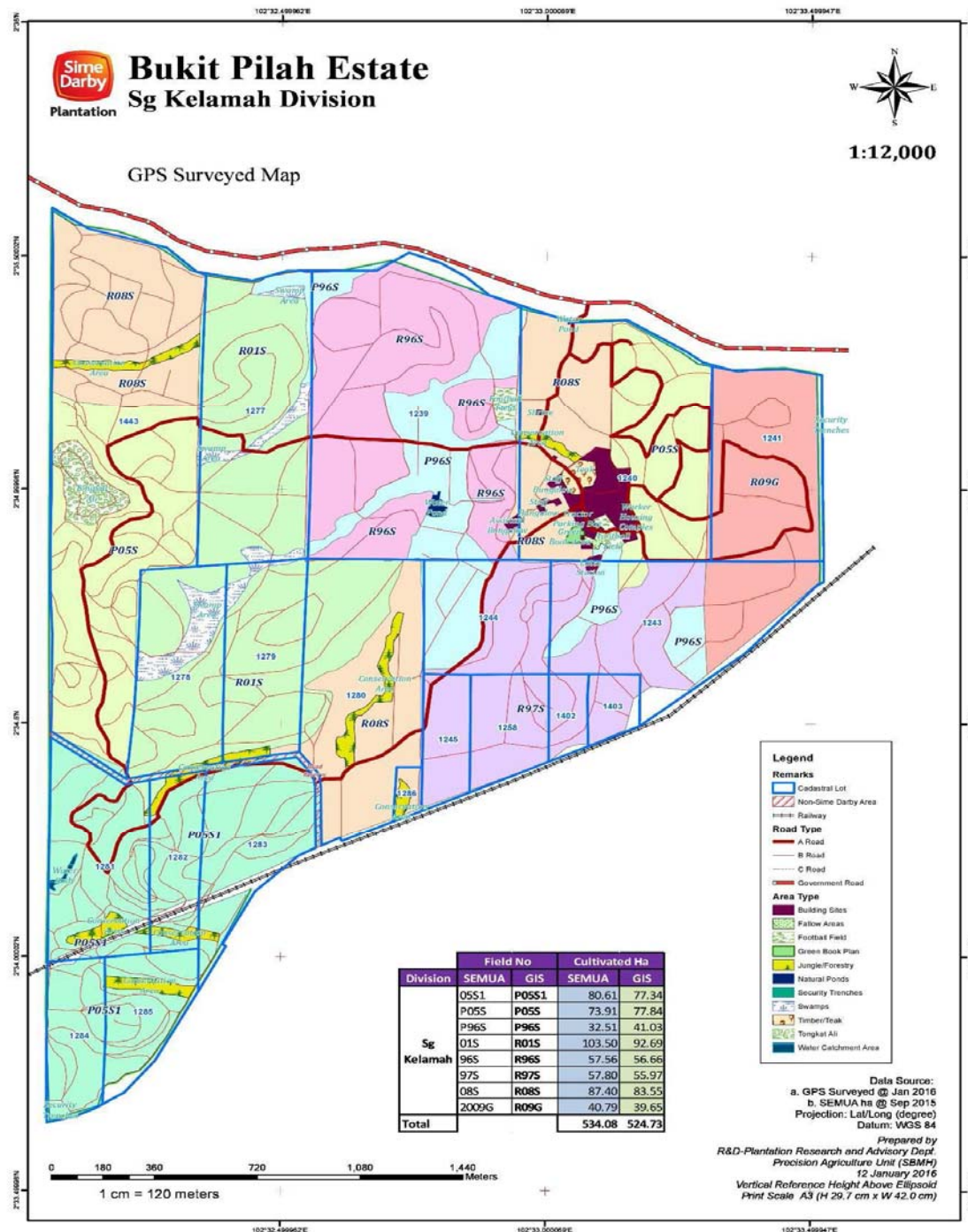


Figure 8. Operational Map of St. Helier Estate - Juasseh Division

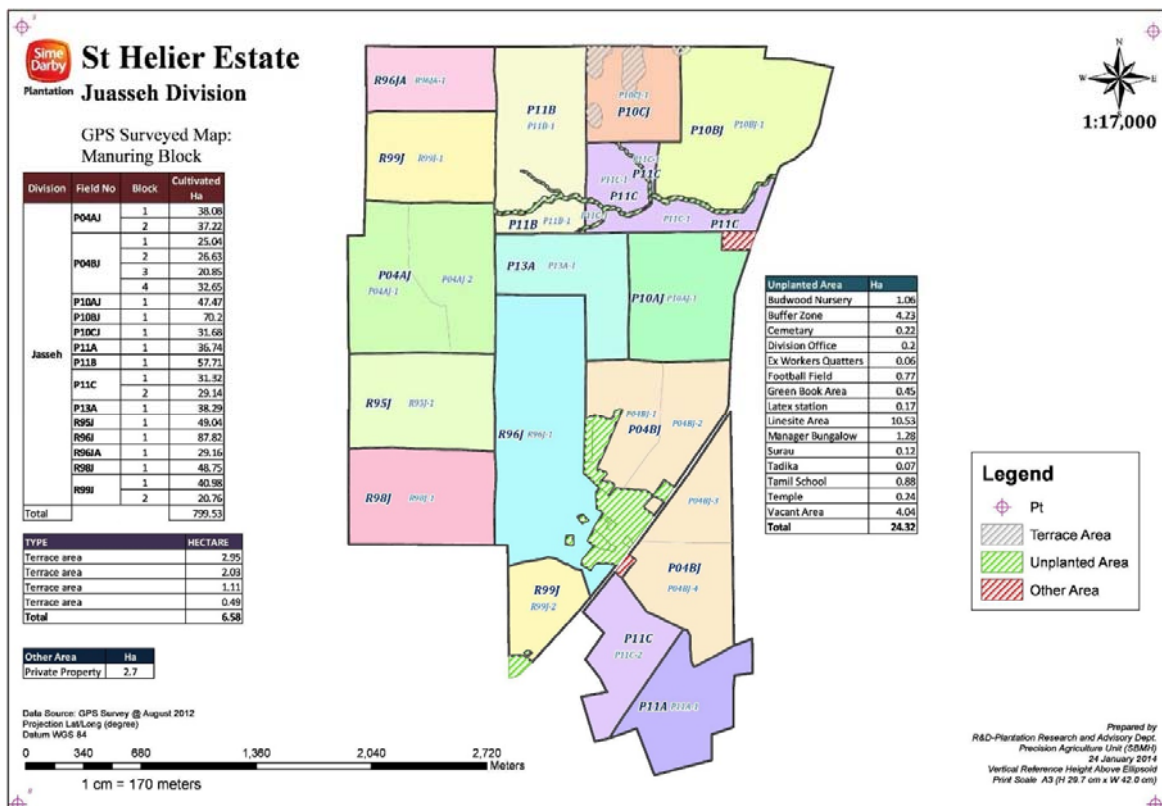
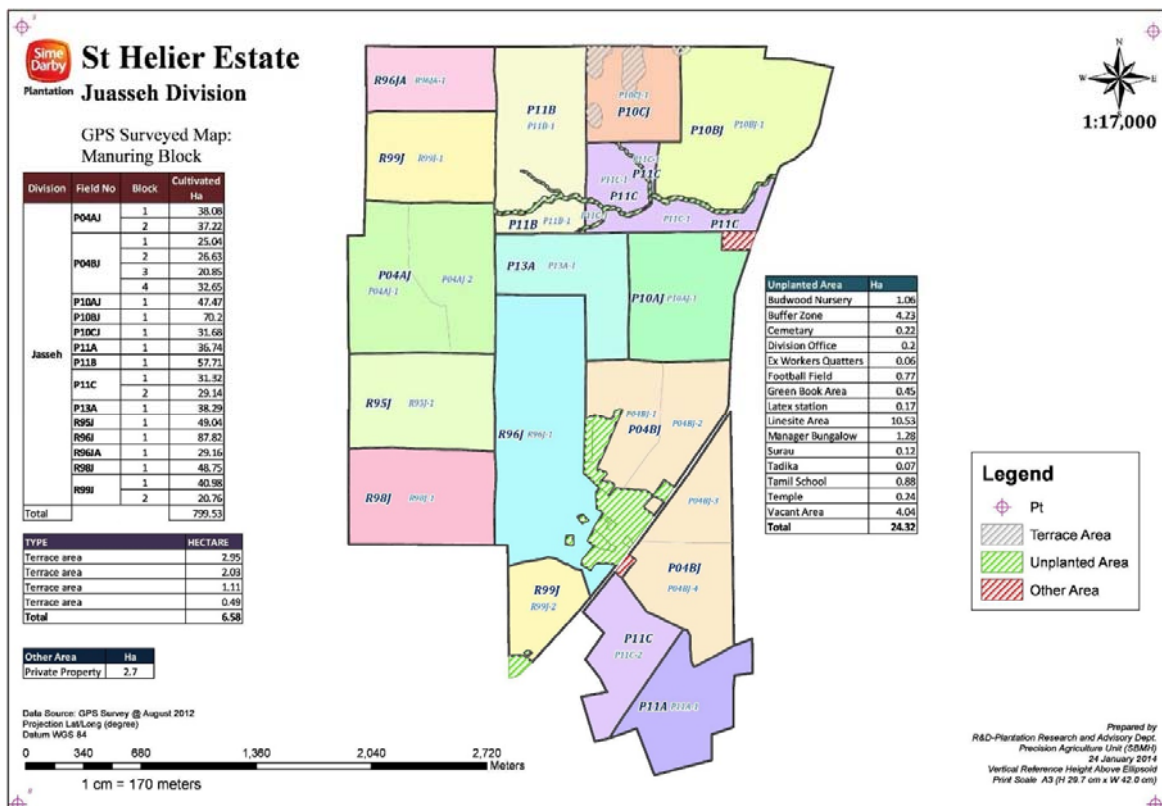


Figure 9. Operational Map of St. Helier Estate - St. Helier Division



Abbreviations Used

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

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

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none">Malaysia National Interpretation (MYNI) 2019 of the RSPO Principles And Criteria 2018 for Sustainable Palm Oil Production, Endorsed by the RSPO Board of Governors on 7th November 2019RSPO Certification System for Principles and Criteria, 14 June 2017	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	SOU 16 Kok Foh – Sime Darby Plantation, Bhd.	
1.2.2	Contact person	Shylaja Devi Vasudevan Nair	
1.2.3	Organisation address and site address	Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia	
1.2.4	Telephone	+(603) 7848 4379	
1.2.5	Fax	+(603) 7848 4363	
1.2.6	E-mail	shylaja.vasudevan@simedarbyplantation.com	
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 on September 8 th 2004	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill with seven Estates supply base, Kok Foh Estate, Sg. Senarut Estate, Muar River Estate, Pertang Estate, Bukit Pilah Estate, St. Helier Estate and Sg. Sabaling Estate.	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	Kok Foh Oil Mill	Kok Foh Palm Oil Mill, 72109 Bahau, Negeri Sembilan, Malaysia	2° 47' 06.9" N102° 30' 12.4" E
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			LatitudeLongitude
	Kok Foh Estate	Ldg. Kok Foh, 72109 Bahau, Negeri Sembilan, Malaysia	2° 47' 06.9" N102° 30' 12.4" E
	Sg. Senarut Estate	Ldg. Sungai Senarut, 85100 Batu Anam, Segamat, Johor, Malaysia	2° 34' 29.0" N102° 40'48.0" E
	Muar River Estate	Ldg. Muar River, PO Box 503, 85009 Segamat, Johor, Malaysia	2° 34' 26.7" N102° 45' 08.0" E
	Pertang Estate	Ldg. Pertang, Simpang Pertang, 72300 Jelebu, Negeri Sembilan, Malaysia	2° 58' 31.8" N102° 15' 34.6" E
	Bukit Pilah Estate	Ldg. Bukit Pilah, 73500 Rompin, Negeri Sembilan, Malaysia	2° 43' 23.1" N102° 30' 38.8" E

	St. Helier Estate	Ldg. St. Helier, 72009 Kuala Pilah, Negeri Sembilan, Malaysia	2° 46' 31.4" N	102° 26' 31.0" E					
	Sg. Sabaling Estate	Ldg. Sungai Sebaling, 72100 Bahau, Negeri Sembilan, Malaysia	2° 55' 00.2" N	102° 28' 56.6" E					
1.5	Description of Area Statement								
1.5.1	Tenure								
	• State		14,853.80 Ha						
1.5.2	Area Statement								
	• Total area		14,853.80 Ha						
	• Mature area		6,614.82 Ha						
	• Immature area		879.60 Ha						
	• Mill		23.95 Ha						
	• Emplishment		107.60 Ha						
	• Infrastructure		519.51 Ha						
	• Nursery		3.24 Ha						
	• HCV		25.60 Ha						
	• Rubber area		6437.86 Ha						
	• Others Area (trenches and road)		241.62 Ha						
<i>*Kok Foh : Land acquisition for TNB and JKR on Sept 2019</i> <i>Pertang: Land re-survey due to replanting on October 2019</i> <i>Muar River & Sg Senarut: Incorrect declaration for total area in 2019. Above is correct figure after land acquisition dated November 2019</i>									
1.6	Planting Year and Cycles								
1.6.1	Age profile of planting year								
	Planting Year	Hectarage (Ha)							
		Kok Foh Estate	Sg Senarut Estate	Muar River Estate	Pertan g Estate	Bukit Pilah Estate	St Helier Estate	Sg Sebalang Estate	Total
	1995	-	-	-	-	32.37	-	-	32.37
	1996	-	72.41	-	73.98	0.00	-	-	146.39
	1997	-	101.44	93.82	-	-	-	-	195.26
	1998	-	-	44.74	-	-	-	-	44.74
	1999	260.83	144.04	73.32	-	-	-	-	478.19
	2000	317.06	248.49	302.65	-	-	-	-	868.20
	2001	391.28	539.64	-	-	38.66	-	-	969.58
	2002	412.55	32.57	77.49	-	163.52	53.66	-	739.79
	2003	-	-		-	-	-	-	0.00
	2004	-	-	-	-	-	295.09	124.66	419.75
	2005	-	154.90	-	145.54	199.82	79.87	-	580.13
	2006	-	146.98	115.23	210.10	195.35	-	-	667.66

	2007	-	-	132.49	-	-	-	-	132.49
	2008	-	-	-	33.340	-	-	-	33.34
	2009	-	-	-	69.30	-	-	-	69.30
	2010	-	-	-	61.37	-	143.86	-	205.23
	2011	-	-	65.65	-	-	-	-	65.65
	2012	0	0	-	-	-	145.32	-	145.32
	2013	0	0	156.98	-	-	36.80	-	193.78
	2014	0	0	55.97	67.30	-	0.00	-	123.27
	2015	-	-	-	87.08	-	-	-	87.08
	2016	0	0	-	137.35	0	0	0	137.35
	2017	217.84	0	62.11	-	-	-	-	279.95
	Total Mature Area	1,599.56	1,440.47	1,180.45	885.36	629.72	754.60	124.66	6,614.82
	2018	224.92	0	79.47	0	0	0	0	304.39
	2019	216.96	0	193.63	0	0	0	0	410.59
	2020	92.55	0	0	72.07	0	0	0	164.62
Total Immature Area	534.43	0	273.1	72.07	0	0	0	879.60	
TOTAL	2133.99	1440.47	1,453.55	957.43	629.72	754.60	124.66	7,494.42	
1.6.2	New Planting area after January 2010			- Ha					
1.6.3	Planting Cycle			25 years					
1.7	Description of Mill and Supply Base								
1.7.1	Description of Mill								
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel			
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)		
	Kok Foh Mill	60	144,139.95	29,869.66	20.70	7,257.06	5.0		
*Production data source from 12 months before assessment (August 2019 to July 2020)									
1.7.2	Description of Certification Scope of Supply Base								
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ ha/year)	Supplied to Mill			
						FFB (tonnes/year)	%		
	Kok Foh Estate	2275.84	2133.99	31868.54	14.93	31868.54	100		
	Sg Senarut Estate	2964.64	1440.47	27225.14	18.90	27225.14	100		
	Muar River estate	1584.62	1453.55	23218.43	15.98	23218.43	100		
	Pertang Estate	1052.49	957.43	16994.711	17.75	16994.71	100		
	BK Pilah	3667.31	629.72	10079.26	16.01	10079.26	100		
	St Helier	1992.65	754.60	17584.99	23.30	17584.99	100		
	Sg Sabaling	1321.35	124.66	3306.97	26.53	3306.97	100		
TOTAL	14853.80	7494.42	130278.04	17.38	130278.04	100			
*Production data source from 12 months before assessment (August 2019 to July 2020)									

1.7.3	FFB description from other source							
	Name of sources/Organisation	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill FFB (tonnes/year)			
	Kemuning (RSPO Certified)	SDPB	-	2535.45	500.44			
	Outside crop (Non-certified)	Outgrower	-	-	74,506.43			
	TOTAL				75,006.87			
	<i>*Source Production Data on 12 months before assessment (August 2019 to July 2020)</i>							
1.7.4	Product categories		FFB, CPO, PK					
1.8	Tonnage of Product							
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (08/2019 to 07/2020) (MT)			
	FFB Processed		154,071.00		143,895.00			
	CPO Production		32,355.00		29,869.66			
	Palm Kernel (PK) Production		8,089.00		7,257.06			
1.8.2	Product selling							
	Type of selling product		Actual selling product for last year (08/2019 to 07/2020) (MT)					
	CSPO sold as RSPO certified product		8,514.94					
	CSPK sold as RSPO certified product		400					
	CSPO sold under other scheme		0					
	CSPK sold under other scheme		0					
	CSPO sold as conventional		10,000					
	CSPK sold as conventional		6800.00					
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Kok Foh Estate	2,275.84	2133.99	32,000.00	15.00			
	Sg Senarut Estate	2,964.64	1440.47	30,000.00	20.83			
	Muar River estate	1,584.62	1453.55	23,000.00	15.83			
	Pertang Estate	1,052.49	957.43	19,000.00	19.84			
	BK Pilah	3,667.31	629.72	11,000.00	17.47			
	St Helier	1,992.65	754.60	18,000.00	23.85			
	Sg Sabaling	1,321.35	124.66	3,300.00	26.47			
	TOTAL	14,853.80	7,494.42	136,300.00	18.19			
<i>*Projected FFB production for 12 months of certificate (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 (%)	
	Kok Foh Mill	60	136,300	28600	21	6820	5	MB
<i>*Projected CSPO and CSPK production for 12 months of certificate (07 July 2020 to 06 July 2021)</i>								

1.9	Other Certifications					
	Others			MSPO Part 3, Part 4 and MSPO SCCS		
1.10	Time Bound Plan					
1.10.1	Time Bound Plan for Other Management Units					
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status
	Mill	Time bound				
	INDONESIA					
1	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 Seiat	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 Kemas	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		-
MALAYSIA						
1	Sg Dingin SOU 1	2010	Bukit Hijau	2010	Kerangan, Kedah	Certified
			Padang Buluh	2010		Certified
			Bukit Selangor	2010		Certified
			Sg Dingin	2010		Certified
			Jentayu	2010		Certified
			Anak Kuli	2010		Certified
			Somme	2010		Certified
2	Chersonese SOU 2	2011	Chersonese	2011	Kuala Kurau, Perak	Certified
			Holyrood	2011		Certified

			Kalumpang	2011		Certified
			Tali Ayer	2011		Certified
3	Elphil SOU 3	2011	Kinta Kellas	2011	Sg Siput, Perak	Certified
			Elphil	2011		Certified
			Kamuning	2011		Certified
4	Flemington SOU 4	2011	Flemington	2011	Teluk Intan, Perak	Certified
			Bagan Datoh	2011		Certified
			Sabak Bernam	2011		Certified
			Sg Samak	2011		Certified
5	Seri Intan SOU 5	2011	Seri Intan (Main Division)	2011	Teluk Intan, Perak	Certified
			Sabrang	2011		Certified
			Sg Wangi	2011		Certified
			Sogomana (Main Division)	2011		Certified
6	Selaba SOU 5	2011	Seri Intan (Selaba Division)	2011	Teluk Intan, Perak	Certified
			Sogomana (Cashwood & Sg Beruas Division)	2011		Certified
			Bikam	2011		Certified
			Clumy	2011		Certified
7	Tennamaram SOU 6	2011	Tennamaram	2011	Bestari Jaya, Selangor	Certified
			Sungei Buloh	2011		Certified
			Bkt Talang	2011		Certified
8	Bkt Kerayong SOU 7	2011	Bkt Kerayong	2011	Kapar, Selangor	Certified
			Bkt Cherakah	2011		Certified
			Bkt Rajah	2011		Certified
			Bkt Lagong	2011		Certified
			Elmina	2011		Certified
9	East SOU 8	2010	East	2010	Carey Island, Selangor	Certified
			Dusun Durian	2010		Certified
			Sepang	2010		Certified
10	West - SOU 9	2010	West	2010	Carey Island, Selangor	Certified
11	Bukit Putri - SOU 10	2011	Bukit Putri	2011	Raub, Pahang	Certified
12	Kerdau SOU 11	2011	Kerdau	2011	Temerloh, Pahang	Certified
			Jentar	2011		Certified
			Mentakab	2011		Certified
			Sg Mai	2011		Certified
			Chenor	2011		Certified
13	Jabor - SOU 12	2011	Jabor	2011	Kuantan, Pahang	Certified
14	Labu	2011	Labu	2011	Nilai, Negeri Sembilan	Certified

	SOU 13		New Labu	2011		Certified
			Bradwall	2011		Certified
15	Tanah Merah SOU 14	2010	Tanah Merah	2010	Port Dickson, Negeri Sembilan	Certified
			Sua Betong	2010		Certified
			Bukit Pelandok	2010		Certified
16	Sua Betong SOU 15	2014	Salak	2014	Port Dickson, Negeri Sembilan	Certified
			Sengkang	2014		Certified
			Siliau	2014		Certified
			PD Lukut	2014		Certified
			Sungai Baru	2014		Certified
			Tampin Linggi	2014		Certified
17	Kok Foh SOU 16	2011	Bukit Pilah	2011	Bahau, Negeri Sembilan	Certified
			Kok Foh	2011		Certified
			Muar River	2011		Certified
			St. Helier	2011		Certified
			Pertang	2011		Certified
			Sg Gemas	2011		Certified
			Sg Sebalang	2011		Certified
			Sg Senarut	2011		Certified
18	Kempas SOU 17	2010	Kempas	2010	Jasin, Melaka	Certified
			Kemuning	2010		Certified
			Tangkah	2010		Certified
19	Diamond Jubilee 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	Tingkeyu	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.		
	LIBERIA					
1	Grand Cape Mount	2018	Matambo	2018	Grand Cape Mount, Liberia	IC
			Grand Cape Mount	2018		IC
			Zodua	2018		IC
			Bomi	2018	Bomi, Liberia	IC
			Lofa	2018		IC
	P & G (New Britain Palm Oil)					
1	Poliamba – Poliamba (POL)	2012	Kara	2012	Keviang, 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 - Guadalcal 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	2013	Sangara	2013	Higaturu, Popondetta, Oro,	Certified

	& Mamba – Higaturu Oil Mill (HOP)		Sumberipa	2013	P&G	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	Mosa; Kumbango; Kapiura; Namumdo; Waraston – West New Britain (WNB)	2008	Bebere	2008	West New Britain	Certified
			Kumbango	2008		Certified
			Togulo	2008		Certified
			Dami	2008		Certified
			Waisisi	2008		Certified
			Kautu	2008		Certified
			Karaus	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
Maralumi Estate	2020	Certified				
Erap Estate	2020	Certified				
<p>Sime Darby has achieved 34 management units in Malaysia, 25 management units in Indonesia, 10 management units in P&G that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 10 in P&G. In the year of 2016 & 2017 there are three Mill that are no longer operating, and for the supplying base (Estate) is diverted to a mill that is still operating and has been certified RSPO. The mills are:</p> <ol style="list-style-type: none">1. Angsana Mini Mill, PT Sajang Heulang: Mill stop operate since 2016 and the supply bases is transfer to Angsana POM, PT Ladangrumpun Subur Abadi.2. Selabak Mill, PT Swadaya Andhika: Mill stop operate since.2017 and the supply bases is transfer to Rantau POM, PT Laguna Mandiri3. Pekaka, SOU 34: Mill stop operate since 2017 and the supply bases is transfer to Lavang, SOU 31 <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"> 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. 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. 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. 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. 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. 6. Ungkaya Mill of PT Tamaco Graha Krida: Plasma TGK has no more FFB supply base, since the credit was over. 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. 8. PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill, i.e. Lembiru Mill. Legalization is still on progress. 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. 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). 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.
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard
	There is no scheme smallholder under Kok Foh POM - SOU 16 SDP.

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA 1.4	<p>1. Mohd Fadzli Bin Bistamam (Lead Auditor), Post graduate qualification in Agricultural Engineering with more than 7 years working experience in Oil Palm Plantation Industry. More than 7 years of working experience in Oil Palm Plantation Industry with skills in Good Agricultural Practices (GAP) and Integrated Pest Management (IPM). Fully trained in similar agriculture certification programs such as RSPO, MSPO and ISCC. Completed and certified in ISO 9001:2015, RSPO Lead Auditor Course, MSPO Training and ISCC Basic Training, and completed RSPO Supply Chain Certification Training on 11th and 12th June 2018. Thus, became qualified Lead Auditor for the above programs. Involved in Oil Palm Sustainability Audit since year 2016. Involved in audits conducted in Malaysia, Indonesia, Papua New Guinea, Ivory Coast, India and Singapore. During this audit he verify legal, continuous improvement & SCCS aspect.</p> <p>2. Mohd Razin Bin Bakal (Auditor), Graduate in Degree of Accountancy with University Putra Malaysia. Having 17 years of working experience in various field in Malaysia, Africa and Indonesia. Have enough knowledge and experiences in oil palm estate operation inclusive of estate administrative, budget preparation, jungle clearing, new planting, nursery establishment and management, harvesting, field upkeep and maintenance, safety and health, vehicle running and skills in Good Agricultural Practices (GAP) including Integrated Pest Management (IPM). Successfully completed an RSPO-endorsed RSPO P&C Lead Auditor Training Course on 14th to 18th January 2019 by CheckMark Training. Involved in MSPO auditing since 2018. Qualified as Lead Auditor/Auditor for MSPO 2530:2013, ISO 14001:2015 and ISO 9001:2015 from Sirim Berhad. Able to speak and understand Bahasa Malaysia and English. During this audit he verify Smallholder inclusion, BMP and environment aspect.</p> <p>3. Ismadi Bin Ismail (Auditor), He holds Diploma in Planting Industry Management from MARA Institute of Technology, Kuantan Pahang. 24 years of working experiences with various plantation companies and skills in Best Agriculture Practices (GAP) for plantation. Fully trained in CoP, MSPO and OSHAS. Qualified as Lead Auditor/Auditor for MSPO and CoP. Involved in MSPO assessment since 2017. Completed and certified MSPO Auditor course in 2017 held by SGS (M) Sdn Bhd and ISO 9001:2015 lead auditor course by TOMC. Successfully completed an RSPO-endorsed RSPO P&C Lead Auditor Training Course on 14th to 18th October 2019 by CheckMark Training. Able to speak and understand Bahasa Malaysia and English. During this audit he verify Transparency, worker welfare and social 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: 3 auditors</p> <p>Number of days for ASA-1.4 at site: 4 days</p> <p>Number of working days for ASA-1.4 at site: 12 Working days</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 Sime Darby Plantation SOU-16 Kok Foh to the requirements of RSPO Principles and Criteria for Sustainable Palm Oil Production and Supply Chain Requirement for CPO Mill.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Number of units in this certification activity is 7 (seven) estates (Kok Foh Estate, Sg. Senarut Estate, Muar River Estate, Pertang Estate, Bukit Pilah Estate, St. Helier Estate and Sg. Sabaling Estate), which supply the raw material (FFB) to 1 (one) palm oil mill (Kok Foh POM). In conducting the assessment, the team of auditors used the $(0.8\sqrt{y}) \times (z)$ formula to determine the management units sampling to be focused on and also considered the issues raised by stakeholder. Based on this formula, the team of auditors determined that the sampling locations are Kok Foh Palm Oil Mill and 3 (three) estates (Kok Foh Estate, St. Helier Estate and Pertang Estate).</p>

	<p>Some opportunities for improvement of the results ASA-1.4 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (Re-certification). Improvement of findings from previous assesment findings were observed by auditors at this ASA-1.4 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.4.</p> <p>The assessment program please find Appendix 2</p>
2.2.3	Locations of Assessment
ASA 1.4	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>POM: Kok Foh Palm Oil Mill</p> <ul style="list-style-type: none"> • Weighbridge Station – Inspection, observation and checking on Traceability SOP • Grading Station. - Inspection, observation, compliance toward SOP of FFB Quality, OSH and employment • FFB process stations (sterilizer, thresher, digester, press, clarification and kernel). – Inspection, Observations and interviews related to best practices, OHS, license, and employment. • Boiler Station. – Inspection, observations and interviews related to OHS, understanding of emergency response • Engine room. – Inspection, observations and interviews related best practices, OHS, and employment. • CPO storage and dispatch. – Inspection, observation related CPO storage and dispatch. • Clarification station – Inspection, observations and interviews related best practices, OHS, and employment. • Sterilizer Station – Inspection, observations and interviews related best practices, OHS, and employment. • Workshop – Inspection, observation, compliance toward SOP, OHS, and employment • POL store – Inspection, observation, compliance toward SOP, OHS, and employment • Schedule waste store - Inspection, observation and compliance toward DOE Compliance • EFB Storage area - Inspection, observation and compliance toward “Jadual Permatuhan” • POM Line site - Inspection, observation and compliance toward SOP and Housing Act <p>Estate: Kok Foh, Pertang and St. Helier</p> <ul style="list-style-type: none"> • Harvesting block – Observation, interview with harvester/mandore, compliance toward SOP, OSH and employment • Spraying block – Observation, interview with sprayer/mandore, compliance toward SOP, OSH and employment • Manuring block – Observation, interview with manure/mandore, compliance toward SOP, OSH and employment • Replanting block – Observation, compliance toward SOP Open Burning, OSH and employment • Boundary stone – Inspection and compliance toward SOP • Riparian area - Inspection and compliance toward SOP • Workshop – Inspection, observation, compliance toward SOP, OHS, and employment • POL store – Inspection, observation, compliance toward SOP, OHS, and employment • Schedule waste store - Inspection, observation and compliance toward DOE Compliance • Chemical Premix area - Inspection and compliance toward SOP • Worker housing – Inspection, observation and compliance toward SOP and Housing Act
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA 1.4	<p>Consultation of stakeholders for by:</p> <ol style="list-style-type: none"> 1. Public announcement at web www.mutucertification.com on 24th August 2020 (https://shorturl.at/lyU39) 2. Public consultation by interview with locals of the nearby village

	<p>3. Consultation meeting and interview with Internal Stakeholder (labour union and gender committee)</p> <p>4. Consultation with NGO (Malaysian Nature Society (MNS) Kuala Lumpur, UNION – AMESU, Centre for Environment, Technology and Development Malaysia – CETDEM, National Council of Welfare & Social Development Malaysia – NCWSDM) via email</p> <p>Numbers of input from stakeholders were clarified by the certificate holder</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (<i>RC</i>) will be conducted eight (8) months to twelve (12) month 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 Kok Foh POM, SOU 16 – Sime Darby Plantation, Bhd. operation consisting of one (1) mill and eight (7) oil palm estates). During the assessment, there were no nonconformities were assigned against Major Compliance Indicator, Two (2) Minor Compliance Indicators, and no findings for supply chain requirement for CPO mill. Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5.

MUTUAGUNG LESTARI found that Kok Foh POM SOU 16 – Sime Darby Plantation, Bhd to the requirements of Malaysia National Interpretation (MYNI) 2019 of the RSPO Principles and Criteria 2018 for Sustainable Palm Oil Production, Endorsed by the RSPO Board of Governors on 7th November 2019 and RSPO Certification System for Principles and Criteria, 14 June 2017.

Therefore, MUTUAGUNG LESTARI Auditor recommended the RSPO Certification of compliance can be continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY	
1.1	<p>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.</p> <p>Sime Darby Plantation Bhd (SDPB) has established Estate Quality Management System, Level 2, Standard Operation Manual Subsection 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1, Year 2008, Issue No 1 dated 1st April 2008.</p> <p>The mechanism is to enable effective and timely communication with employees and external interested parties. The audit team observed that the above SOP specifies the means to communicate and consult with the relevant stakeholders pertaining to the company's safety & health, social, environmental and other aspects. Interview with foreign workers sighted that the workers has been known about communication procedure.</p> <p>Information relating to land titles, safety and health plans, pollution prevention plans was made available at all Estates or Mill. Among the documents that were made available for viewing were land titles, occupational health and safety plans, EIA reports, SIA reports, details of complaints and grievances, negotiation procedures, continuous improvement plans, and human rights policy.</p> <p>Furthermore, information regards to Sustainability Reports, sustainability policies, Human Rights Charter, practices and key initiatives which include Lean Six Sigma and Continuous Improvement, Safety and Health, Environment, Biodiversity Conservation, Environmental Conservation can be retrieve through the company's website http://www.simedarbyplantation.com/. Confidential documents such as financial, personal and etc. are not allowed to be shared publicly. The Estate & Mill Manager is responsible to address all communication and request for documentations that could be made available to public or stakeholders.</p> <p>The company has established Communication Procedure either Internal or External Stakeholders. The information was available in two (2) languages English and Malay. This document was accessible to stakeholder as sighted at Mill and Estate notice board. The information being disseminated to the Internal and External Stakeholders either through Townhall Session or External Stakeholders' Meeting. Interview with foreign workers sighted that the workers has been known about communication procedure.</p> <p>Stakeholders will write in formal letters to Estate / Mill Management whenever there are any requests or assistance. Requests for official documents through the estate / mill office will have to go through the Manager/Assistant in charge, whom will make the decision as to whether the information can be shared to or viewed by the person requesting the information or document. Among those sighted in FY2020 were:</p>

Estate	Stakeholder's Request
Kok Foh	Request a donation by Chairman, Sri Buvaesvari Temple on Temple Festival 2020 dated 6 TH February 2020. The application has been approved on 24 th February 2020 amounting RM500.00
Pertang	Request by SRJK (Tamil) Ladang Pertang dated 4 th September 2020 to have a meeting with Sime Darby Pertang Estate Manager on 9 th September 2020. The request has been agreed on 22 nd September 2020.
Kok Foh Mill	Request by SJK Tamil Ladang Kelpin dated 23rd July 2020 to supply Black Soil for School Landscape Programme. The application has been approved on 27th July 2020.
St Helier	Request by SJK St Helier dated 4 th September 2020 to use Estate road as a track for School Cross Country Event on 7 th & 8 th September 2020. The approval have been granted on the even date.

All the Estates and Mill have appointed their person in charge to monitor Consultation and communication. The list of the names as below: -

1. Kok Foh Estate is En. Muhammad Khairul Anwar bin Abdul Hamid, Medical Assistant through appointment letter dated 03.03.2020.
2. In Pertang Estate, Mr. Muhammad Akmal bin Jamaludin, Assistant as the person in-charge through an appointment letter dated 01.02.2020 approved by the Estate Manager, Mr. Mohd Redzuan Mohamed Zin.
3. En. Mohd Khairi bin Abdul Kudus as person in-charge for Kok Foh Mill being appointed on 1st July 2018 by En. Abdul Halim bin Shahor, Senior Manager
4. En. Muhammad Syafiq bin Abdul Manap as person in-charge for St Helier being appointed on 2nd July 2019 by En. Saiful Azrul Abdul Halim, Manager

Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders through several meetings with the internal and external stakeholders such as at Kok Foh Estate, the procedure being communicated to 190 workers during morning briefing as well as Town Hall Session dated 23rd April 2019. The procedure for consultation and communication is also available through website address <http://simeedarbyplantation.com>.

All estates and the mill audited have updated the list of stakeholders. The details included in the listing are the name of agencies, handphone no, address and position. The categories of external stakeholders identified such as:

	Kok Foh Estate	Pertang Estate	Kok Foh Mill	St Helier
	No of stakeholders			
Government	34	40	19	24
Local Communities	8	9		12
Vendors / Suppliers	46	10	63	14
Supplying Estate			11	11
Contractor	6	5	11	3
Total	94	64	104	64

Status: Comply

1.2

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

Sime Darby Plantation Berhad has implemented Code of Business Conduct (Edition: August 2018) where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes.

It contains, among others, the following aspects of business conduct, Equal opportunity and non-discrimination, Criminal activities, Harassment and violence, avoiding conflicts of interests, guarding against bribery and corruption, how to report a violation, Anti money laundering and anti-terrorism financing. The policy was developed in Bahasa Malaysia and English.

In the Contractors Agreement there are clausal related Vendor Integrity Pledge, that described The Vendor Code of Business Conduct (VCOBC) which outlines the standards behavior required from the vendor relating to:

- a. Labor and human rights

- b. Environment, safety and health
- c. Ethics and management practices

All the vendors are mandatory to sign Vendor Integrity Pledge prior commencement / executing their contract. Several sample documents signed by contractors and suppliers for the estates have been verified by auditor. Code of Business Conduct training to all suppliers and Contractors has been conducted as below:

Estate	Date of Meeting	No of Participants
Kok Foh	25 th March 2020	20
Pertang	To be conducted on 12 th September 2020	
Kok Foh Mill	25 th February 2020	37
St Helier	4 th March 2020	7

To ensure that the organization's compliance and ethics program a briefing / training will be conducted on Code of Business Conduct to all levels in the organization as well as to vendors. Furthermore, there are 2 systems in place to ensure compliance to Code of Ethical at Sime Darby Plantation Berhad Group. An internal department which is Group Integrity Governance Assurance (GIGA) and Group Sustainability Department (RC) will conducted in house internal audit.

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.

The company has established legal register identifying laws and regulations that applicable to estate operations. The legal register titled "Estate/Mill – Upstream Malaysia, Legal and Other requirement Register (LORR)" has been last updated by Group Sustainability & Quality Management (GSQM) in June 2020. The summary of the evaluation of compliance shows 100 % compliance for criteria related to occupational safety and health, environment, water, human resource and other requirements.

The mill's and estates' compliance with legal requirement are evident from licenses and permits that sighted which are renewed and kept valid. Example sighted in the mill include:

- MPOB license No. 5436566004000 validity from 01.11.2019 until 31.10.2020
- DOE License No. 006013 dated 01.07.2020
- Jadual Pematuhan from DOE (ASNS(B)31/152/000/005). Validity from 01.07.2020 until 30.06.2020
- CepSEam Certificate awarded to the Mill Sr. Manager, Tn. Abdul Halim Bin Shahor, dated 06.05.2016
- Fire Certificate No. 315181 validity period from 09.03.2020 until 08.03.2021

For estate, example sighted in Pertang Estate:

- MPOB License No. 528546002000 validity from 01.04.2020 until 31.03.2021 (Menjual dan mengalih FFB)
- Diesel permit (Permit Barang Kawalan Berjadual) No. N000304 for storing 6,000 liters of diesel. Validity from 01.10.2019 until 30.09.2020.
- Air compressor license no. PMT-NS/19 25720 dated 19.09.2019
- Permit for salary deduction from Jabatan Tenaga Kerja Negeri Sembilan (JTK) for electricity deduction, temple fund, water supply bill, etc. Sighted letter from JTK dated 20.08.2019 (Ref: (3) PMT 10501/2019/0093)
- Child protection policy

The company has established a manual (Standard Operation Manual, version 1, year 2008) to ensure legal compliance is in place. The identification of the changes on the legal requirements is the responsibility of the HQ department (Group Sustainability Department). The legal register titled "Legal and Other requirement Register (LORR)" is been last updated by Group Sustainability & Quality Management (GSQM) in July 2019.

Sighted "Revision History" of all the changes and addition of new legal and regulations made by GSQM. The latest update sighted:

1. Date: 09.06.2020

Description: Perintah Pencegahan dan Pengawalan Penyakit Berjangkit

2. Date: 15.07.2019
Description: Workers' Minimum Standards of Housing and Amenities (Amendment) Act 2019
3. Date: 14.12.2019
Description: Auxiliary Police Regulations 1970

The estate map seen highlighted with presents of boundary markers which attached to photos taken on site. There are also monitoring activities and GPS coordinates are available to demonstrate whether the boundary demarcation and maintenance are implemented and monitored. During field visit, sighted the estate at certain part of the land area are adjoining to smallholder's plantations [rubber / palm oil, villages and government roads. Sighted the original boundary stones maintained and identified in the map. In St. Helier Estate, a total of 12 boundary stones are maintained by the estate management.

The POM is on the land of Kok Foh Estate. The mill perimeter found fenced from illegal entrance by outsiders. The mill has no plan of extension of operational area.

Status: Comply

2.2

All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.

The mill and all estates audited have maintained the list of contractors working in the mill / estate in document "List of Stakeholders FY 2020". The list includes details such as contractor name, address and contact numbers. Among the contractors listed by Kok Foh estate includes:

1. Mahin Varma (FFB Transport)
2. Ponvel Enterprise (POME & EFB Transport)
3. Gunalabur Enterprise (Replanting Contractor)
4. Kumar A/L Karupiah (Domestic waste disposal)

All estate contractors have understood and signed the Vendor Pledge Integrity (*Ikrar Integriti Vendor*) where they agreed to comply with:

- a. Labour and human rights
- b. Environment, safety and health
- c. Ethics and management practices

For FFB transporter in the estate, they have agreed to comply with local laws and regulations as per documented in "Transporter Obligations and Undertakings", item no. 2: Compliance with laws and company's policies, procedures & guidelines. Example laws documented in this document:

1. Employment Act and Industrial Relation Act
2. Occupational Safety and Health Act 1994 and Environmental Quality Act 1974
3. Road Transport regulations of Malaysia
4. Over loading
5. Company & Third-Party Policies and Principles
6. Other regulations, guidelines, conditions, policies and instructions

There are no young workers employed by all the contractors as there are bonded to the agreement signed before commencing their work in mill and estates.

Status: Comply

2.3

All FFB supplies from outside the unit of certification are from legal sources.

The mill is operating under Mass Balance module where it is receiving FFB from own estate (Sime Darby Plantation Bhd) and outside crop (FFB).

List of FFB Supplying estates to Kok Foh POM available during the audit as per document RSG Kok Foh. The list includes FFB supplier from own estate (Sime Darby) and third-party supplier. The RSG document details out data such as Supplier name, categories, geolocation, volume supplied to mill, etc Example listed in the form:

Own Estate (Sime Darby)

1. Kok Foh Estate
2. Pertang Estate
3. Bukit Pilah Estate
4. St. Helier Estate
5. Muar River Estate

Third-party Supplier (Directly Sources FFB)

1. Bukit Palong Plantation (MPOB No: 508628302000)
2. Hong Bee Agriculture Sdn Bhd (MPOB No: 524673015000)
3. Biofresh Synergies S/B (MPOB No: 767945001005)
4. Felcra Berhad Kawasan Kepis (MPOB No: 503081402000)

Third-party Supplier (Indirect FFB Supplier)

1. Eng Huat Latex Concentrate Sdn Bhd (MPOB No: 505907315000)

Based on RSG Kok Foh sighted that all FFB source is are legally source.

Status: Comply

PRINCIPLE #3 OPTIMISE PRODUCTIVITY, EFFICIENCY, POSITIVE IMPACTS AND RESILIENCE

3.1

There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.

The certificate holder (CH) has long-term management plan period 2019 to 2023. Seen the plan consist and focus on production cost [FFB received, CPO & PK produced, OER and KER]. The processing cost [FFB reception, FFB handling, sterilization, threshing, pressing, clarification, depericarping, kernel recovery, boiler, power generation, storage, laboratory, water treatment plant, POME, workshop and EFB disposal] As for the fixed administrative cost [staff, executive, office, security, general and others. The plan/budget is reviewed annually, prepared by the mill management, and approved by the HQ. Example data sighted:

Year: 2020

Mill Intake (FFB): 231,137.04 MT (Own Estate and outside crop)

CPO Production: 49,370.02 MT

OER: 21.36%

KER Production: 12,272.54 MT

KER: 5.31%

For Kok Foh Estate. Example data sighted:

Year: 2021

Mature Hectare: 1,564.23 Ha

Immature Hectare: 569.76

FFB: 31,416.86 MT

Yield/ha: 22.00 MT/Ha

Mature upkeep: RM 688.71/mt

Harvesting cost: RM 49.90/mt

Transport cost: RM 23.25/mt

Sampled Estate management unit shows replanting program and its realization for period 2021 until 2025. SOP for replanting is documented in Sime Darby Agricultural Reference Manual (ARM), Issue date 01.07.2011. Fields are going for replanting when the age is older than 20 years old and the yield is less than 20mt/ha for coastal estate and less than 18mt/ha for inland estate. The final decision for replanting in the estate is from the GM for each SOU. Replanting program in Kok Foh Estate as below:

Year	Total Hectare	Proposed SPH
2021	0	148

2022	51.33	148
2023	131.17	148
2024	144.69	148
2025	153.36	148

All operating units audited have conducted Management Review Meeting on annual basis. Management review meeting for Kok Foh POM was done in July 2020 attended by operation and office staff, such as foreman, laboratory supervisor, charge man and the mill manager chaired the meeting. Seen the meeting discuss on status of cost saving programmes, overtime issues, outside crop supplier's details, the operation of compost plant and etc. Several key highlight issues i.e:

- Follow up action from previous management review
- Review of process performance and product conformity based on target parameters
- Updating on Water management plan 2020
- Saving electricity in mill.
- Review status of corrective and preventive actions arose from MSPO/RSPO internal audit.

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.

Management plan sighted in the estate includes Environmental Management Plan – Kok Foh Mill 2020. There are several plans categorised into:

1. EAI/EIE Management Plan
2. Waste Management Plan
3. Water Management Plan
4. HCV Management Plan
5. GHG Reduction Plan

Among the plan listed above, sample objectives documented in the GHG Management Plan is to monitor the BOD level at final discharge pond by conducting regular monitoring at final discharge and to send samples to SAMM. The person in-charge for this task in the mill Assistant Manager. Sampling of the final discharge is on monthly basis. The latest sample from the final discharge was sent to Sime Darby Research Sdn Bhd on 18.08.2020. The analysis result has not yet available as the date of audit. Sighted "Sample Receipt Advise" dated 18.08.2020 to show that all the samples received by the lab.

In Pertang Estate, the management has established action plan as per documented in "Action Plan for FY2020 of Sime Darby Plantations Pertang Estate". The action plan contains input for:

1. Waste Management Action Plan 2020
2. Action Plan for Environmental Management
3. Action Plan for Biodiversity
4. Action Plan for Reduction of Water Usage
5. Action Plan for Use of Water Contingency

Example action plan sighted in Environmental Management:

1. To monitor usage of chemicals and diesel on monthly basis (Action by Tn. Muhammad Akmal on monthly basis)
2. No open burning is allowed at workers' housing area and in the field (Installing "No open burning" signage)
3. Desilting main drain and collection at yearly basis

Company also review the economic components in monthly basis such as expenditure, overspent and underspent.

3.2.2: The RSPO metrics template is not yet available from RSPO. Company has informed about submitting ACOP to RSPO Secretariat.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

All operating units audited are operating according to the procedures that have been established by the company. Based

on field observation in mill and estate it's known if the procedure has been implemented and the workers can demonstrate work technique in accordance with procedure. All procedures are provided in English and available on the Estate and Mill Office. The procedures are used by the executives and transferred to the workers through training and socialization. The company has established several numbers of SOPs as sighted during the audit such as:

1. Sustainable Plantation Management System
2. Estate Quality Management System
3. Occupational Safety and Health Manual
4. Standard Operating Procedure

For estate daily operations, the estate is referring to Standard Operating Procedure (Issue No. 1, date 01.11.2018) and Sime Darby Agricultural Reference Manual (Issue: 2011/1). The SOP includes:

1. Planting Material
2. Nursery Techniques
3. Replanting
4. Land Preparation
5. Planting Density
6. Maturity Age
7. Field Upkeep
8. Manuring
9. Canopy Management
10. Water Management in coastal/ peat plantings

The monitoring of the mill process is made through the shift supervision headed by an Engineers. All process parameters are documented and summarized in a daily report. In addition, there are audits by Mill Advisor, Sustainability Quality Management (SQM), Regional SQM and Group Integrity Governance & Assurance. This is to ensure compliance to Policies, procedures in relation mill operations, financial, OSH etc. Latest internal audit in the mill was conducted by GSQM Department and SQM Central West Region. In Pertang Estate, the latest internal audit was conducted on 06th March 2020 as per report sighted "RSPO/MSPO Internal Audit Report for Pertang Estate". Total of 3 Major NC, 4 Minor NC and 6 OFI were raised and all the findings have been closed as per documented in the Internal Audit Report. All the findings have been closed as per documented in "Non-conformity report and opportunity for improvement". Management review meetings are conducted annually to discuss all findings from estate and mill internal audits and other related matters. Latest management review meeting in Kok Foh was conducted on 13.03.2020. The minute meeting was prepared by estate MA and approved by the Manager. Among the agenda discussed in the meeting such as:

1. Results of internal audit covering RSPO, MSPO & SCCS
2. Customer feedback
3. Status of preventive and corrective actions
4. Follow-up actions from management reviews
5. Changes that could affect the management system

SOP trainings are conducted regularly to ensure workers understand all the procedures to be followed when working in the estate. Trainings conducted in Pertang Estate such as:

1. Blower and Alion Spray Training attended by 12 participants (28.07.2020)
2. PPE Training for spraying gang attended by 12 participants (22.07.2020)
3. Fire drill & First aid kit training by Fire Department

NC (3.2.2):

Kok Foh POM

1. Based on the checklist pasted in front of first aid box cover, there are 16 items needs to be stored inside the first aid box. However, during the mill visit by the auditor, it was found the first aid box was not maintained as listed below;

Station	FFB Ramp	Supervisor Room	Workshop
Items was not in the first aid box	1. Analgesic Cream 2. Cotton Buds 3. Folding Scissors	1. Exam Gloves 2. Folding scissors 3. Povidone - Iodine	1. Folding Scissors 2. Povidone - Iodine

<p>According to Standard Operating Procedure (SOP) 7 – Depericarping Station, Clause G – Cleanliness of the nut polishing drum and the surrounding area is the responsibility of the Kernel Station Operator. However, during the mill visit by the Auditor, it was found the evidence of oil from the sprocket dropped on the floor and flowing to the drain.</p> <p>2. With reference to Standard Operating Procedure (SOP) 7 – Depericarping Station, Clause G – Cleanliness of the nut polishing drum and the surrounding area is the responsibility of the Kernel Station Operator. Evidence, oil from the sprocket dropped on the floor and flowing into the drain.</p> <p>3. During site visit to Kok Foh POM workers' housing complex, sighted that the domestic waste such as plastic bottle, non-biodegradables plastic bag, paper box and can was not disposed according to the Palm Oil Mill's Waste Management Plan.</p>																	
3.2.2	Status: Non-conformity No. 2020.01 with non-critical category																
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.																	
No new activities / operations in the mill and new planting in the estates that requires the operating units to conduct the SEIA.																	
<p>The complex (SOU 16, Kok Foh) has conducted Social impact Assessment on 01st – 13th February 2016 by Sustainability Strategy Unit, PSQM Department. The objectives of this assessment are to identify the existing social issues in the study area and to develop social management plan for respective study area that is agreed by both PSQM Department and Operating Unit Management. For environmental aspect, the mill is maintaining a pollution prevention management plan for on-going operations such as chemical store, effluent pond and domestic waste dumping site.</p> <p>The assessment was conducted in consultation with mill management and other staff, contractors and workers, as well as site visits to the field, mill, offices and line sites. All issues related to the stakeholders as per reported in this report point 7.0 (SIA Findings and Recommended Action Plan). Social Management plan (2020) available during the audit. It includes objectives, category, actions, frequency and the person in-charge.</p> <p>For latest replanting in Pertang Estate (72.02 Ha), the management has conducted an SIA as per reported in Addendum SIA on Replanting Activity, dated 27.08.2020. The assessment was only involving the estate workers (Harvesters) as the replanting field is not neighboring to any village or other smallholders. The objective of the assessment is to brief workers on the replanting activity and its potential impact to workers.</p> <p>Social Management plan (2020) for Kok Foh Estate is available during the audit. It includes objectives, category, actions, frequency and the person in-charge. The management plan was prepared by Mr. Khairul Anwar (Medical Assistant) and approved by the estate manager. The plan includes details such as issues, action taken and its status. Example management plan documented:</p>																	
<table><tr><th>Category</th><th>Actions</th><th>Frequency</th></tr><tr><td>Communication on policies/SOP on social to relevant stakeholders</td><td>Organize social, gender, child protection, whistleblowing policy briefing to all employees</td><td>As and when necessary</td></tr><tr><td>Monitoring of pay and agreement of workers and contractor workers</td><td>Monitor the pay and agreement of workers and contractor workers, in compliance with current legal requirement and CA.</td><td>Monthly</td></tr><tr><td>To maintain housing and facilities provided to workers</td><td>Attend to workers' complaint on housing and other facilities in timely manner</td><td>As and when required</td></tr><tr><td>CSR to surrounding communities / workers</td><td>To contribute and document monetary / non-monetary aid to local communities</td><td>At least once a year</td></tr></table>			Category	Actions	Frequency	Communication on policies/SOP on social to relevant stakeholders	Organize social, gender, child protection, whistleblowing policy briefing to all employees	As and when necessary	Monitoring of pay and agreement of workers and contractor workers	Monitor the pay and agreement of workers and contractor workers, in compliance with current legal requirement and CA.	Monthly	To maintain housing and facilities provided to workers	Attend to workers' complaint on housing and other facilities in timely manner	As and when required	CSR to surrounding communities / workers	To contribute and document monetary / non-monetary aid to local communities	At least once a year
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CSR to surrounding communities / workers	To contribute and document monetary / non-monetary aid to local communities	At least once a year															
	Status: Comply																
3.5																	
A system for managing human resources is in place.																	
The company has established as procedure for workers hiring as per document No. AMU/LR-SOPP/MARCH2016 dated 30 th March 2016. The objective of the document is to provide the guidelines on the recruitment drive and interview /																	

selection process for potential foreign workers candidate which shall be conducted at the respective source countries. The approved criteria for potential candidates as follow:

1. Type of sector: Oil palm / rubber plantation
2. Job category: Plantation workers
3. Nature of work: All type of tasks such as harvesting, loading of FFB, spraying, manuring, etc
4. Age: 18 – 45 years old
5. Weight: >50 kg
6. Gender: Male
7. Medical requirement: Certified fit by FOMEMA

The employment procedures are strictly being followed by the company. Employment contracts are available during the audit. All documents are filed in individual file for each mill and estate employee. During the audit, auditors have taken few samples of employment contract from all the estates being audited. The copy of workers' passport and Malaysian work permit available during the audit. The employment contract was prepared into the workers' national language and English Language. Terms and conditions as per stated in this document:

1. Duration of employment
2. Place of work
3. Salary
4. Working Hours
5. Medical
6. Accommodation
7. Compliance
8. Foreign workers compensation scheme

Status: Comply

3.6

An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.

The group has established a sustainability policy as per policy titled "Kenyataan Dasar Kelestarian & Kualiti Kumpulan" signed by Mohamad Helmy Othman Basha, Pengarah Urusan Kumpulan on 02.12.2019. For upstream operation, safety policy as per document "Upstream Malaysia – Health, Safety & Environment (HSE) Policy Statement" signed by Roslin Azmy Hassan, CEO Upstream Malaysia on 01.06.2020. Interview with workers in mill and estate, sighted that workers has been known about sustainability policy.

The HIRARC in Kok Foh Mill seen reviewed on various dates such as for sterilizer station on 16/11/18, threshing station on 01/04/19, working at height 08/10/18, etc. It will be reviewed if any occupational accident happens. The document describes the description/activity, potential hazards, risk assessment and risk control. Based on site observation at boiler and engine room in Kok Foh Mill, it was clearly confirmed that workers had been aware related potential risk and hazards in the workplace. Following up on this, the company has been reducing the potential risk by routine socialization about OHS, providing PPE, and OHS signboard are available in workplace.

All the estate operations in the estate audited has been risk assessed as per HIRARC document sighted. HIRARC for Kok Foh Estate (2020) available during the audit. The document is reviewed annually and when there are any changes required to the assessment. The review form sighted where the changes has been recorded from 26.02.2017 until 29.06.2020. Example activities being assessed in the document such as:

1. Spraying
2. Transportation
3. Harvesting
4. Welding in workshop
5. Application of Inorganic fertilizer
6. Supervision

For estate operation involving with chemicals, the management is conducting Chemical Health Risk Assessment (CHRA) which has exceeded the period of 5 years. The management has appointed NISAFETY CONSULTANCY to conduct a new CHRA in all SOU16 estates. Sighted a letter from NISAFETY CONSULTANCY addressed to Director, JKKP Negeri

Sembilan, dated 28.08.2020 informing that the company has been appointed by Kok Foh Estate. Assessment has been conducted by the consultant in all estates. Reports are not yet available as the date of audit.

Interview was conducted to the mill operators. Based on the results of interviews can be concluded that workers understand the OHS policy and it is recognized that every morning meeting is always affirmed about the importance of safety and the use of PPE in work. For example, mill employees exposed to high noise such as boiler employees and engine rooms who have used a complete hearing protection device according to risk analysis, namely earmuff and ear plug. There are no complaints from employees exposed to high noise exposure. Audiometric testing for year 2020 will be conducted to 80 mill workers soonest as per letter of quotation received from EMREST(M) Sdn Bhd (10.06.2020). Estate workers are also being provided with PPE. Record of PPE issuance sighted as per PPE Book. The PPE commonly issued to workers such as rubber gloves, helmet, shoes, and apron. PPEs are provided to estate workers for free and can be replaced any time when the unit is damaged.

All the estates and mill audited have established OSH committee. OSH Committee in Kok Foh estate chaired by the estate manager (Tn. Azhari Bin Kadir) as per OSH Organization Chart. The committee consisted of 8 employee representatives and 10 workers' representatives. The estate has also established ERP Team to assist estate workers in case of any emergency such as fire, flood, search & rescue and chemical spillage. The team also consists of certified first aider (Estate MA), En. Khairul Anwar. In Pertang Estate, OSH Committee is chaired by the Manager (Tn. Mohd Redzuan Bin Mohamed Zin). The committee consist of 6 employee representatives and 7 employer representatives. Safety meetings are conducted regularly (every 3 months) in all the estates audited. Latest safety meeting in Kok Foh Estate was conducted on 24th March 2020 discussing on Safety report from AP, Accident report, workplace inspection report etc. Latest safety meeting in Pertang Estate was conducted on 16.06.2020.

Accidents cases are reported to JKKP via mykkp.dosh.my. Sighted latest report for year 2019 where Kok Foh has reported 3 accident cases with 81 days of mandays lost. The total working hours recorded in year 2019 was 545,938 hours. Accident investigation report for both accident cases available during the audit as per document "Incident Detailed Report". HIRARC for harvesting has been reviewed by the management, dated 06.12.2020. There was no accident case reported in Pertang Estate in year 2019. Total working hours in Pertang Estate was 219,128 hours.

In St. Helier Estate, there was no accident occurred involving oil palm plantation workers.

To ensure the effectiveness of all precautions that have been implemented by mill and estates, yearly training programs are established by the management. The list of training identified includes:

1. Foreign workers induction program
2. Harvesting operation and quality
3. Emergency response plan
4. First aid training
5. Safe driving technique
6. Scheduled waste management
7. Chemical & Spraying Safe operating procedure

Status: Comply

3.7

All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.

The mill management has identified all the trainings required in year 2020 as per Mill ESH Training Matrix. The trainings plan is for personnel identified such as Mill supervisor, Foreman, Chargeman, Storekeeper, Fitter and the Weighbridge operator. In all the estates audited, the training program for year 2020 developed by the management. The list of training identified as per individual training record for every estate worker in year 2020 such as Chemical Management, Harvesting Competency Training Program, Defensive driving technique, Maintenance of spray equipment & calibration, etc.

Training records are available for verification by auditors. Example training records and attendance available during the audit in Pertang Estate such as:

1. Blower and Alion Spray Training attended by 12 participants (28.07.2020)
2. PPE Training for spraying gang attended by 12 participants (22.07.2020)
3. Fire drill & First aid kit training by Fire Department

4. Briefing about progressive pruning (19.08.2020)
5. Briefing Noise Assessment for personal test (05.09.2020)

Training of supply chain has been conducted as per training record dated 01.06.2020. The training was provided by the mill Sr. Assistant and attended by 10 mill participants including weighbridge operator, mill assistant manager, and Auxiliary Police (AP).

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1, 3.8.2, 3.8.3, 3.8.4

Kok Foh Palm Oil Mill applied Mass Balance supply chain model because the mill receives and process all FFB's from certified and uncertified sources. The 12 months projected production for CPO and PK has been recorded by the CB. The production is based on volume of FFB provided by all the supplying estates. Based on documents verification, the mill has registered in RSPO IT Platform.

3.8.5

Facility has had Standard Operation Procedure for Sustainability Supply Chain and Traceability (issue date: April 2019). This procedure's objectively is guidelines for estates and palm oil mills to establish and ensure effective implementation on sustainable supply chain and traceability of certified sustainable materials (Fresh Fruit Bunch, (FFB); Crude Palm Oil, (CPO) and Palm Kernel (PK)).

This procedure covering of supply chain scope, responsibilities, control of document & records, delivery FFB from estates, receiving FFB at the mill, process monitoring, CPO & PK dispatch, nonconforming product and/or documents, product claims, outsourced contractor, training, reclassification of mill's supply chain model, production volume, conversion factors, internal audit, complaints and management review. It document also equipped with flowchart for crop diversion, list of certification type and supply chain status and rules for determining FFB determination.

According to the procedure's above, person who have responsibilities in supply chain implementation is:

1. Head of Operating Unit shall have the overall responsibility for the implementation of this SOP.
2. Head of Operating Unit may assign roles to the relevant personnel or invite personnel from various department where necessary to assist in the implementation of this SOP.

During the audit, auditor has visited and interview weighbridge operator and production clerk. Both of them are able to explain and demonstrated supply chain procedures especially in mass balance implementation.

3.8.6

According to the section 18.0, Standard Operating Procedure for Sustainability Supply Chain and Traceability, internal audit conducted at least annually. The last audit has been held by Sustainability Unit, Group Sustainability Quality Management (GSQM) and Regional Sustainability Quality Management (RSQM) on 03rd March 2020. Based on internal audit there are 1 Major NC and 1 OFI raise by the internal auditor. The correction and corrective action plan have been submitted to the sustainability team thus closed the findings raised earlier.

3.8.7

Documents verification the unit of certification can be presented by the volume of FFB received as follows as per mill mass balance table and mill production report. Example data sighted in mass balance table:

Date	FFB Actual Received from Certified Sources (total per month), MT	FFB Received from Non-certified Sources (total per month), MT	Total
			Total, MT
31-Jan-2020	6,432.67	3,337.78	9,770.45
29-Feb-2020	8,494.58	5,938.59	14,433.17
31-Mar-2020	9,540.10	5,710.24	15,250.34

Quarterly Total	24,467.35	14,986.61	
30-Apr-2020	11,938.59	8,075.10	20,013.69
31-May-2020	12,090.87	6,576.25	18,667.12
30-Jun-2020	15,386.28	7,977.35	23,363.63
Quarterly Total	39,415.74	22,628.70	
Grand Total	63,883.74	37,615.31	

- ii. As per interview with the mill assistant manager, the mill will immediately inform the CB if there is any overproduction of the certified tonnage.
- iii. Procedure for handling non-conformance products has been highlighted in document "SOP for Sustainable Supply Chain and Traceability", issue date April 2019 (Item No. 11.0: Non-Conforming Products And / Or Documents).

3.8.8

The mill is delivering its product (CPO) to own refinery (SDP Nuri Refinery). The sales from refinery is handled by SDP Marketing Department (Global Trading). During the audit sighted documentation of CPO delivery to the refinery:

Weighbridge ticket No: 013801

Date: 07.07.202

DN No: 009676

Vehicle No: 7696

Destination: Nuri Edible Oil (NEO) Complex

Seller: Kok Foh Palm Oil Mill

Material: Crude Palm Oil (CPO) RSPO MB

Transporter: 194-NASHREENA

Quantity: 37,960 kg

Weighbridge ticket No: 013896

Date: 30.07.202

DN No: 004473

Vehicle No: 8467

Destination: Nuri Edible Oil (NEO) Complex

Seller: Kok Foh Palm Oil Mill

Material: Crude Palm Oil (CPO) RSPO MB

Transporter: 194-NASHREENA

Quantity: 38,400 kg

3.8.9

Facility has had a physical handling agreement with third parties for CPO transport from mill to bulking. Based on document verification, there is only one transporter listed as CPO transporter on behalf Nashreena International (M) Sdn Bhd. Sighted contract agreement (Adhoc Contract) commencing from 01.08.2020 until 31.10.2020. The contract is between Nashreena International (M) Sdn Bhd and Sime Darby Plantation Bhd., dated 01.08.2020. All the terms and conditions are stated in the Appendix 3 of the contract. The contractor has agreed to comply with local laws and regulations as per documented in "Transporter Obligations and Undertakings", item no. 2: Compliance with laws and company's policies, procedures & guidelines. Example laws documented in this document:

1. Employment Act and Industrial Relation Act
2. Occupational Safety and Health Act 1994 and Environmental Quality Act 1974
3. Road Transport regulations of Malaysia
4. Over loading
5. Company & Third-Party Policies and Principles
6. Other regulations, guidelines, conditions, policies and instructions

3.8.10

Facility has had a physical handling agreement with third parties for CPO transport from mill to bulking. Based on document verification, there is only one transporter listed as CPO transporter on behalf Nashreena International (M) Sdn Bhd with the address No.9,Jalan 8/1A 46050 Petaling Jaya Selangor Darul Ehsan Malaysia.

3.8.11

No outsource activities to any independent third parties by the management.

Communication is through the list of 'Mill Stakeholder List' maintained by POM, which includes all relevant suppliers and contractors to the mill. The procedure for informing the CB has been highlighted in the SOP for Sustainable Supply Chain and Traceability (Item No. 13.5 and 13.6).

3.8.12

Records kept by the mill are up to-date. The retention period for all traceability records are maintained for a minimum period of (3) years as highlighted in item 5.4 (SOP for Sustainable Supply Chain and Traceability).

Mass balance table available during the audit. Data are recorded for a period of 3 months from January until December. For period January 2020 until March 2020, data sighted as follows:

FFB Received (Certified): 24,467.35 MT
 FFB Received (Non-certified): 14,986.61 MT
 Total CPO Produced: 8,722.430 MT
 CSPO dispatched as RSPO certified: 8,131.33 MT
 RSPO MB CSPO Credit Balance: MT
 CSPO dispatch as conventional: 7,590.81 MT

PK Produced: 1,205.66 MT
 PK dispatched RSPO MB: 0 MT
 PK dispatched conventional: 1,515.27 MT
 RSPO MB PK Credit Balance: 1,205.66 MT

3.8.13, 3.8.14

Conversion rate for mill is regularly updated as per mill monthly production report. Sighted report for August 2020:

FFB received: 20,304.27 MT
 CPO production: 4,215.593 MT
 OER: 20.74%
 Kernel produced: 1,018.799 MT
 KER: 5.01%

3.8.15

Kok Foh Palm Oil Mill applied Mass Balance supply chain model because the mill receive and process all FFB's from certified and uncertified sources.

3.8.16

The responsibility for shipping announcement is by the marketing department (Global Trading) as per SOP for Sustainable Supply Chain and Traceability (Item No. 10.4). The GT shall make the necessary transaction of RSPO certified CPO and PK in the RSPO IT Platform. Sighted transaction of CSPO made under Palm Trace – Kok Foh Palm Oil Mill. The shipping announcement was confirmed made within 3 months. Example for contract no. S/CCE/2007/CPO002 (Date: 02.07.2020), the shipping announcement was made on 08.07.2020.

As the date of audit, no overproduction of certified product by the mill.

3.8.17

No claim has been made by the mill. It is the responsibility of the marketing department (Global Trading). The product claim SOP It has been highlighted in SOP for Sustainable Supply Chain and Traceability (Item No. 12.0: Product Claims).

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.

The Group Sustainability & Quality Policy Statement was established on 2nd December 2019 signed by Managing Director, Mohamad Helmy Othman Basha. The commitment on Human Right was stated under-paragraph no. 3:

- i) Contributing to a better society: respecting and upholding and no exploitation of fundamental human rights
- ii) Providing safe and healthy workplace and protecting workers welfare
- iii) Engaging and empowering communities

Sime Darby Plantation, Responsible Agriculture Charter and Human Rights Charter, Revised 2020 have elaborated further on the Social Relating Issues. All the details are embedded in www.simedarbyplantation.com.

A commitment made by the Sime Darby on Human Rights prohibiting retaliation against Human Rights Defenders (HRD) was stated in Human Rights Charter (Revised 2020) under 3.4 Protection of Human Rights Defenders, Whistle-blowers, Complainants and Community Spokespersons. The Policy being relay to Internal Stakeholders through morning muster / Townhall Session and external stakeholders via stakeholder meeting.

There is no mercenaries and paramilitaries use in the operation of Sime Darby Plantation Berhad. It has confirmed based on stakeholder consultation conducted during the audit. Violence and harassment had been clearly stated in Responsible Agriculture Charter which:

- i) Clause 2.2: i) eliminating all forms of bonded and forced labor, including a ban on charging of recruitment fees for the restricting free movement
- ii) Protecting children from exploitation and combating child labor – we will not employ anyone under the age 18
- iii) Creating a working environment where all forms of harassment and abuse can be eliminated
- iv) Xii- ensuring that violence is never used to resolved labour issues or conflict

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.

The procedure for handling social issue was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Internal Social Issues. The management should ensure the identity of complainants, human right defender, community spokespersons and whistle-blowers would not be revealed unless it is legally impossible to do so or with his/her consent and permission. The complainants, human right defender, community spokespersons and whistle-blowers will be treated fairly and given whatever protection is possible, without risk of reprisal or intimidation. So far, no complaint received in estate and mill.

Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll-free number/ hotline can be found in www.simedarbyplantation.com.

Complaint Form can be obtained at the Estate Office. Interview with the local and foreign confirmed they are aware of the above process. Merely, complaints on Housing Maintenance being observed in all sampled Estates and Mill.

The procedure for handling social issue was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Internal Social Issues. The procedure that has been put in place to ensure that the complaints and grievance procedure is understood include displaying the procedure on all main notice boards, detailing out the procedure in a flowchart, and for illiterate parties, verbal briefing was given.

The Standard Operating Procedure specifies the timeframe to be taken to provide feedback to the stakeholder is: -
a. Within 2 weeks from the date receiving the queries.

- b. Within one week of the completion of the investigation for communication requiring investigation.

The relevant management personnel may extend due to extenuating circumstances or with justifiable reasons time limit. So far, no complaint received from internal and external except for housing maintenance. Evidence, all the stakeholders are informed on the progress of their grievances. Amongst the complaint and grievances address in FY2020 are: -

- i. No complaint at Kok Foh Estate to date.
- ii. 18 complaints recorded to date at Pertang Estate.
 - Sampled taken on complaint by Mr. AA dated 27th June 2020 at House No 121 Pertang Estate on leaking of piping. The issue was resolved on 1st July 2020. Additionally, complaints of house defects and rectification works were recorded and counter-signed by the house occupant.
- iii. 24 complaints recorded to date at Kok Foh Mill.
- iv. 14 complaints recorded at St Helier Estate.
 - Sampled taken on complaint by Mr. BB dated 11th June 2020 at House No 65 St Helier Estate on leaking of piping and faulty electricity socket. The issue was resolved on same day. Additionally, complaints of house defects and rectification works were recorded and counter-signed by the house occupant.

All the complaints been responded timely and agreed by both parties on the outcome.

Seen in Sustainable Plantation Management System Appendix 3, Flowchart and procedures on Handling Land Disputes, Version 1 Year 2008, Issue No 1, Issue Date: 1/11/2008 –

- a. Procedures for Handling Boundaries Disputes
- b. Procedures for Handling Squatters Disputes

The complaint and grievance resolution have included the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. There is no case of conflict at Estates and Mill which need to include the option of access to independent legal and technical advice.

Status: Comply

4.3

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

Estate and Mill is committed and have contributed to local development. The contribution made to the internal and external stakeholders. Sighted, a Corporate Social Responsibility contribution on Donation for:

Estate / Mill	Contribution Records
Kok Foh	a. Request a donation by Chairman, Sri Buvanesvari Temple on Temple Festival 2020 dated 6 TH February 2020. The application has been approved on 24 th February 2020 amounting RM500.00
Pertang	a. Request to use Estate Tractor for Temple Festival on 1 st March 2020 through a letter by Chairman, Sri Maha Mariamman Temple dated 3 rd February 2020. The approval has been granted on 11 th February 2020. b. Request by SRJK (Tamil) Pertang Estate for maintenance and cleaning at the school. The application has been approved on 2 nd March 2020
Kok Foh Mill	a. Biodiversity Programme between SOU 16 and Fisheries Department of Negeri Sembilan dated 18 th June 2020.
St Helier	a. Request by SJK Tamil St Helier Estate Headmaster on 12 th February 2020 to provide transport during Sport Day on 27 th February 2020. The request has been granted on 19 th February 2020.

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.

Documents related to the history of land tenure and the actual legal or customary use of the land are available for verification.

Estate	Ownership	No Hakmilik	Hectare	Syarat Nyata
Kok Foh	The China Engineers (M) Sdn Bhd	H.S.(D) 2160 H.S.(D) 2148	186.96 33.99	Pertanian Kelapa Sawit

		H.S.(D) 2138 H.S.(D) 2158 H.S.(D) 2159 71054 65972 1119 7795	63.13 802.78 5.17 609.35 197.58 105.50 271.90	Kelapa Sawit Pertanian Pertanian Kelapa Sawit Kelapa Sawit Kelapa Sawit Kelapa Sawit
			2,276.37	
Pertang	Sime Darby Plantation Sdn Bhd	60261 60223 60260 75376 75373 75374 75375 82922 15467	966.69 3.01 29.61 8.02 2.10 14.49 41.33 5.14 31.58	Kelapa Sawit Getah Getah Getah Getah Getah Getah Getah Getah
Application to change the " Syarat Nyata" from Rubber to Oil Palm was submitted to Pentadbir Tanah Jelebu dated 20 th December 2018. The Department has acknowledged received the application on 27 th December 2018, no outcome to date.				
			1,101.97	
Kok Foh Mill	The China Engineers (M) Sdn Bhd	17795	271.2812	Kelapa Sawit
St Helier	Sime Darby Plantation Sdn Bhd	723 63453 61138 60786 724 61162 75372 1973 60825 1971 61003 60219 63096 73401	1.2393 0.2931 1.3886 3.149 1.9475 1.5757 55.5451 1.1509 190.59 1.0876 201.5331 40.2778 259.4031 340.833	Kelapa Sawit
			1,100.0138	

All the estate owns by the Sime Darby Plantation Sdn Bhd and there is no evidence of land dispute nor customary land based on the interview with manager and workers. Cross verified the land titles against quit rent payment for 2019 found no discrepancies.

The Estate and Mill owns by the Sime Darby Plantation Bhd, there is no evidence of land dispute nor customary land. The land ownership documents being verified and justified. There is no land extension nor new acquisition from previous audit.

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.

No new planting activities at SOU 16 Kok Foh Complex. There is no land expansion nor new acquisition 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.

The Estate and Mill owns by the Sime Darby Plantation Bhd , there is no evidence of land dispute nor customary land. The land ownership documents being verified and justified. There is no land expansion nor new acquisition from previous audit.

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.

The Estate and Mill owns by the Sime Darby Plantation Bhd , there is no evidence of land dispute nor customary land. The land ownership documents being verified and justified. There is no land expansion nor new acquisition from previous audit.

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.

The Estate and Mill owns by the Sime Darby Plantation Bhd , there is no evidence of land dispute nor customary land. The land ownership documents being verified and justified. There is no land expansion nor new acquisition from previous audit.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION
5.1
The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.

Source of FFB is solely from Sime Darby Plantation Group under Kok Foh Complex and Outside Crop Producer (OCP). There are 9 supplies under Group Estates and 9 OCP under their record. The name of estate as follows;

Group Estates

1. E-Bukit Pilah
2. E-Kemuning
3. E-Kok Foh
4. E-Muar River
5. E-Pertang
6. E-Sg. Gemas
7. E-Sg. Sabaling
8. E-Sg. Senarut
9. E-St. Helier

Outside Crop Production - OCP

1. Biofresh Synergies Sdn. Bhd.
2. Bukit Palong Plantation Sdn. Bhd.
3. Cheong Wing Chan Sdn. Bhd.
4. Eksklusif Pesone Sdn. Bhd.
5. Eng Huat Latex Concentrate Sdn. Bhd.
6. Felcra Berhad Kws Sg. Londah
7. Felcra Berhad Pondo
8. Ladang Kawasan Kepis
9. Permodalan Pelangi Sdn. Bhd.

The price for FFB supplier is vary and decided by the Sime Darby Plantation Berhad based on MPOB price. There are price method used to determine the FFB price and the formula is FFB price = [OER x (CPO Price – Price stabilization Cess – Transport charge)] + (KER x PK price) – Processing cost.

Daily FFB reference Price Summary by Region is being displayed at the weighbridge station during the POM visit. Based on the interview with Assistant Manager POM, the rational of practice is for easy price reference made by all Outside Crop Production (OCP) during their FFB dispatch to Kok Foh Palm Oil Mill. Sighted the Smallholder minutes of meeting

conducted on 4th August 2020 which has been attended by POM's and Estates' representative, Outside Crop Production and Community surrounding the Sime Darby Plantation. One of the meeting agenda is about the FFB quality and pricing.

Based on the MSPO SCCS module, POM was registered under Mass Balance (MB). Source of FFB is from Sime Darby Plantation Group under Kok Foh Complex and Outside Crop Producer (OCP). There are 9 supplies under Group Estates and 9 OCP under their record.

Sighted the contract agreement between the Kok Foh Mill and Peserta Felcra Malaysia Berhad (KPFB) – Ladang Kawasan Lakai, Koperasi Peserta – Peserta Felcra Malaysia Berhad (KPFB) – Ladang Kawasan Pondo and Permodalan Pelangi Sdn. Bhd. – Ladang Bukit Keledak. The agreement was signed and agreed by both parties. Based on the contract agreement Under clause 8.1) The pricing of the FFB shall be calculated and determined in the manner shown in the Third Schedule hereto.

All the contract agreement are available and kept at POM / Head Quarters Sime Darby Plantation at Ara Damandara. Requests for official documents through the POM office will have to go through the POM Manager/Assistant in charge, whom will forward the request to the person in charge at HQ Level to retrieve the agreement. Sighted offer letter between Sime Darby Plantation Berhad with Outside Crop Production (OCP) regards of "Purchase of crop". The contract spell clearly the term and agreement. Sighted the agreement between Kok Foh Palm Oil Mill and the OCP, the agreement clearly spell and stated that all payment will be made either through online bank-in or telegraphic transfer (T.T) or cheques to the supplier's bank accounts. Manner / Breakdown of payment of the monthly purchase price as follows;

1. Advanced payment:
On weekly basis which the payment of 70% of the value equivalent to the total FFB delivered every 7 days or more during the delivery month shall be made by the purchaser to the supplier at any time prior to the end of the week of the said month.
2. Final Payment
Payment of the remaining outstanding monthly purchase price shall be made by the purchaser to the supplier on or before the 10th day of the following month.

The rate of payment was clearly indicate in the contract agreement. There were no issues or complains made by the FFB Supplier regards of payment thus far.

The mill weighbridges have been calibrated annually. The calibration was conducted by Metrology Corporation Malaysia Sdn. Bhd. Sighted Perakuan Penentuan Timbang dan Sukat for 2 units of weight bridge at POM as follows;

1. Weighbridge No. 1
Borang D (Timbang dan Sukat)
Permit Number : B 1489576
Equipment series No: 00784416JC
Capacity : 60MT
Valid : 11th October 2020 – 11th October 2021
2. Weighbridge No. 2
Borang D (Timbang dan Sukat)
Permit Number : B 1578042
Equipment series No : 02562046JM
Capacity : 60MT
Valid : 10th December 2019 – 10th December 2020

Sime Darby Plantation Berhad – Kok Foh Palm Oil Mill has maintained list of FFB supplier including smallholder. Total of 9 Outside Crop Production (OCP) has registered thus far. Based on the interview with Sustainability Executive, certification from each individual FFB Supplier is by their own responsibility. However Sime Darby Plantation Berhad has arranged the Crop Quality Awareness Clinic for Outside Crop Production (OCP). The clinic was conducted by Sime Darby Plantation Berhad on 4th August 2020 at Kok Foh Palm Oil Mill. The agenda of clinic as follows;

1. Crop quality awareness for OCP Supplier
2. Awareness about the Sustainability Certification MSPO, RSPO and ISCC

Sime Darby Plantation Berhad has established Sustainability Plantation Management System, Section 7 – Implementation and control, Version: 1, Year: 2008, Issue No: 1 and Issue Date: 1st November 2008. The procedure will be used Upon any arising social issue, the matter shall be brought forward to the respective mill and estate management. All the complaints and grievances were handled by the POM Management. A complaint and grievances logbook are kept in the POM Office. No negative complaints made by smallholder within last 24 months.

Status: Comply

5.2

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

Sighted SIA Report prepared by Sustainability Strategy Unit, PSQM Department, Sime Darby Plantation Berhad, in charged by Mr. Ramendhiran Govindasamy (Sustainability Executive) and Reviewed by Mr. Lim Gao Yih (Assistant Manager POM). Questionnaire were distributed during annual stakeholder meeting. All the questions are in bilingual for ease of understanding. The SIA has covered:

- a. Access and Use Rights
- b. Economic Livelihoods and Working Conditions
- c. Cultural and Religious Values
- d. Health & Education hub
- e. Subsistence Activities
- f. Amenity
- g. Employment
- h. Human rights
- i. Food and Water Security
- j. Other Community Values

To access on the livelihoods improvement for smallholder, its has been covered under SIA section B : Economic Livelihoods and Working Condition. The result as below;

Result	Impact	Enhancement	Date Completion	Person In Charge	Status
i. 80% of the respondents benefited from the business opportunity provided by POM management	Low	Management will continue the current practice in providing relevant benefit to external stakeholders. Besides, management will continue to ensure that all contractors are briefed with Sime Darby Supplier Code of conduct, Sustainability Requirement Contract Agreement Term and conditions, as well as fulfilled the external contract agreement checklist.	September 2020	Assistant manager / Estate Manager	On going
ii. 10% of the respondents benefited from the infrastructure facilities provided by POM management					
iii. 10% of the respondents benefited from information sharing provided by POM management					

Based on the interview with Sustainability Executive, certification from each individual FFB Supplier is by their own responsibility. However Sime Darby Plantation Berhad has arranged the Crop Quality Awareness Clinic for Outside Crop Production (OCP). The clinic was conducted by Sime Darby Plantation Berhad on 4th August 2020 at Kok Foh Palm Oil Mill. The agenda of clinic as follows;

1. Crop quality awareness for OCP Supplier
2. Awareness about the Sustainability Certification MSPO, RSPO and ISCC

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1
Any form of discrimination is prohibited.

Sighted, Sime Darby Plantation Berhad has a Non-Discrimination And Equal Opportunity Policy stated in Sime Darby Plantation Human Rights Charter under 3.2 Respect and Uphold Labour Rights, 3.2.5 Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.

Based on worker employment master record, there are mixed of India, Nepal, Bangladesh and Indonesia foreign workers lives and work with local employees. Interview with office staff and general workers whom mentioned their job selection process was fair and transparent.

This policy is available in English and Malay displayed at the mill and estate office wall and notice boards. The policy being relay to Internal and External Stakeholders through several series of training and briefing session. For example, at Kok Foh Estate, the procedure being communicated to 190 workers during morning briefing as well as Town Hall Session dated 23rd April 2019. Townhall Session for year 2020 being planned in September as it has been postponed from earlier planning in March due to COVID 19 pandemic outbreak.

Recruitment Procedure for foreign workers was under Workforce Management Unit, Liaison & Recruitment, Standard Operating Process & Procedures (SOPP) WMU/LR-SOPP/JAN2016/R1 Revision 1 Date 1st November 2016 and for locals under Standard Operating Procedure, Hiring of Local Workers dated 1st November 2019. All employee has been interviewed and confirmed they are freely and voluntary enter into employment. All workers in the sampled estates and mill have valid employment contract which been signed by both employee and employer.

Recruitment at foreign country (India, Nepal, Indonesia, Bangladesh) will be conducted by the HR Department in HQ and Sime Darby absorbs all employee-related statutory recruitment fees (medical check-up, Fomema, processing, transportation, work permit fee, levy). The Estate and Mill maintaining the "Passport Save Keeping" of their respective workers. The workers have 2 options either to retain by The Management or themselves. On the 1st option, a consent letter from workers available during the audit.

Through interviewed with few workers, they understand about the equal opportunities and they explained that there is no discrimination happened on job distribution, benefits, wages and etc. Sighted the employment contract for workers also mentioned the job scope offers based on skills of harvesting, spraying or do general work and fit with medical check-up. No foreign workers being recruited in FY2020 resulted from Movement Control Order 2020 in response to Covid 19 pandemic. Status of recruitment as at August 2020: -

Estate / Mill	No of Workers	
	Local	Foreigners
Kok Foh	2	0
Pertang	0	0
Kok Foh Mill	2	0
St Helier	1	0

Based on worker employment master record, it has been confirmed no female workers has been employed specifically for field workers such as spraying and manuring at all the Estates and Mill. Based on the interview with the Gender committee, the practice of Pregnancy testing is upon the request by the staffs / workers and change of work category.

Female Gender Committee has been established in every estate and mill. The meeting being conducted on quarterly basis. The details as listed herein: -

Estate	Date of Meeting	No of Participants
Kok Foh	9 th June 2020	10
Pertang	17 th July 2020	13
Kok Foh Mill	3 rd July 2020	9
St Helier	20 th July 2020	14

The meeting agenda was on Social Policy, Social & Humanity Management Policy, Gender Policy and Polisi Perlindungan Kanak-kanak. Seen, the Minutes of Meeting and attendant lists. Issues raised were resolved and no pending issues. Sighted the Gender Committee Handbook (First Edition) in English details out specifically on establishing & managing gender committee and complaints and grievance procedures to address gender-based issues.

Verified from the workers' payslip (May'20 & Jun'20) and workers database, salaries are based on 'Minimum Wages Order 2020 - RM 1200.00. They are salary schemes set by management in HQ and it is applicable for all Sime Darby Estate and POM. Respective units have no rights to set workers salary unless have approval from HQ. Evidence, the workers with same work scope was having the same pay rate.

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).

The auditor has randomly sampled the employment contract for the foreign and local worker, Workers interviewed are aware on the terms and conditions which has been clearly specified in the employment contract. Base on the sampled at Estate and Mill, no discrepancy of monthly wages, no forced overtime works and salary being paid before 7th of every month. Sampled salary slips for May 2020 and July 2020 found no workers receives pay below than RM 1200.00 unless if the worker took unpaid leave or absent to work.

The workers interviewed in the field able to explain the payment received date, deduction and basic salary. The employment contract for India workers seen in Tamil and Bangladesh workers in their national language version and a copy of English version attached as well. For Indonesian, the contract also available in Bahasa Indonesia. The contracts acknowledged by the workers as part of confirmation that the workers understood the content of agreement.

Base on the Pocket Check-roll Book and cross verified against pay slips of the sampled workers found no discrepancies over overtime calculations, number of working days, deductions and complied to legal labour requirements.

The workers are provided with housing, water and electricity supply at subsidize rate, medical and education & transportation aid. Grass cutting and fogging was conducted at the line site. Hospital / Medical Assistant has conducted line site inspection on weekly basis and the records were sighted. Treated water is for domestic usage in Kok Foh Estate & Mill and water analysis has been conducted annually and result no trace of E. coli and total coliform present.

As for Pertang and St Helier Estate, both electricity and water are supplied by the Government. The electricity or water deduction is based on the usage that the deduction scheme agreed by both parties in written form.

The Estate and mill provide facilities such as recreational places, religious building, community hall, sundry shop, food stall, electricity, and water. During site visit to line-site, interview both local and foreign workers whom claimed the management provides decent living quarters with proper drainage system, weekly domestic waste collection, attend to household repairs and free water supply for domestic consumption.

Clinic facility available in the integrated worker's housing complex whereby the treatment, medicine and consultation are provided free of charge. There are qualified Medical Assistant 24 hrs standby in any case of emergency. Major case will be referred to nearby Government Hospital, for instance Kok Foh Complex and Pertang Estate refer to Jempol Hospital.

There is grocery shop in nearby the mill and estate and workers freely to buy and report to management if they found the price unfair. During the site visit, it was found that the price is displayed publicly. The worker's line site is easily connected to a nearby small town, ie Pertang Estate to Simpang Pertang Estate and Kok oh Complex to Rompin or Bahau where workers are able to purchase their groceries. However, they need to obtain approval / permission from Management.

Sighted the calculation of Prevailing Wages for year 2020 for SOU 16, Kok Foh Complex. The respective managers from the visited sites were able to demonstrate and justify the input used to derive the final figure. Based on the calculation, there are a few elements been included (housing, electricity, water, education, creche, healthcare, transport, sports & recreation, total cost of in-kind benefits and average monthly take home salary per worker) in the calculations that using

the RSPO endorsed method. Total Value of Prevailing Wages Per Month as below: -

	Local	Foreigner
Estate / Mill	RM 1,582.56	RM 1,731.82

No employment of contract, casual nor temporary workers. All the estate activities (spraying, manuring, harvesting, upkeeping jobs, etc) are fully managed by workers under their payroll.

Status: Comply

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.

Sighted in Sime Darby Plantation Human Rights Charter under 3.2 Respect and Uphold Labour Rights clause: -
3.2.4 Respecting Freedom of Association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, we will provide alternative means of employee engagement and grievance redressal. Workers interview found they are aware on their rights to voice out any issues and they are allowed to join the Union. The policy being briefed to all workers during Town Hall Session and Stakeholder Meeting either at Estates or Mill.

A meeting with Estate NUPW and AMESU Representatives was conducted to discuss issues related to workers. The committee comprises of different nationality such as Nepal, Indonesia, India and local. All the NUPW representatives were elected democratically by the workers themselves. For example, the last meeting in Pertang Estate was conducted on 10th December 2019, attended by 20 workers' representatives.

Status: Comply

6.4

Children are not employed or exploited.

Sighted in Sime Darby Plantation Human Rights Charter (Revised 2020) under 3.3 Respect and Uphold Children's Rights stated We recognise that protecting the wellbeing of children mean safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography by:

- 3.3.1 Eradicating child labour in our supply chain. We will not employ anyone under the age of 18 years.
- 3.3.2 Providing process for remedy if children are found working. We will develop a solution that is in the best interest of the child in partnership with qualified organisations.
- 3.3.3 Recognising that education is a crucial component in effectively eliminating child labour, we commit to providing all our workers' children with access to primary and secondary education.

Based on document reviewed and Interviewed with office female staff, Field Supervisor and Gender Committee President found that the Estates and Mill do not employ workers less than 18 years old and there is no young workers in all operating units audited.

The policy being briefed to all workers during Town hall Session and Stakeholder Meeting either at Estates or Mill as below:

1. At Kok Foh Estate, the procedure being communicated to 190 workers during morning briefing as well as Town Hall Session dated 23rd April 2019. Townhall Session for year 2020 being planned in September as it has been postponed from earlier planning in March due to COVID 19 pandemic outbreak.
2. In Pertang Estate, the procedure being communicated to 9 Management & Staffs, 54 workers and 4 contractors during Town Hall Session dated 5th April 2019. Townhall Session for year 2020 being planned On 12th September 2020 as it has been postponed from earlier planning due to COVID 19 pandemic outbreak.

Furthermore, all Directors, Employees of the Group, Counterparties and Business Partner to adopt similar principles and standards of behaviour as stated in Code of Business Conduct (COBC) Handbook August 2020. Example for Child labour Policy is under clause 5.7 Human Rights of COBC bullet No 8 stated Protecting the rights of children. We seek to promote the wellbeing of children, and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography.

Status: Comply

6.5

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

Sighted in Sime Darby Plantation Human Rights Charter under 3.2 Respect and Uphold Labour Rights clause: -
3.2.6 Creating a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict.

The policy being relay to internal and external stakeholders through: -

- a. External stakeholder meeting
- b. Gender Committee Meeting
- c. Townhall Session with Internal Stakeholders
- d. Sime Darby website, <http://sime-darbyplantation.com>.

Since the sampled estates and mill has no female field workers, therefore only the office staff was verified during interview process who mentioned there is no such case occurred in their premises.

Since the sampled estates and mill has no female field workers, therefore only the office staff was verified during interview process who mentioned there is no such case occurred in their premises. No new mothers recently given birth, breast feeding at the Estate.

The procedure for handling social issue was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Internal Social Issues.

In Sustainable Manual sighted the policies in regard to whistle-blower's protection, resolving verifiable complaints, grievances and conflicts through open, transparent and consultative process.

Instead of whistle blowing, the workers have another medium to relay their complaints and grievances through SUARA KAMI – TALIAN BANTUAN PEKERJA. The complaints will be directed to Sime Darby HQ for investigation. This medium being handled by 3rd party.

The complaint and grievance mechanism being briefed to workers during morning muster as well as Townhall Session. Cross interviewed workers, reveals they are aware on the mechanism and did acknowledge to fill-up Complaint Form at Estate / Mill Office if they have any request and/or suggestions.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

Interview with local and foreign workers in the mill and sampled estates, it reveals they are freely and voluntary enter into employment. All workers have valid employment contract which been signed by both employee and employer, a copy given to workers. The audit team has sampled the validity and legality of worker's passport, work permit and employment contract agreement and found satisfactory with no negative issues.

Interviewed with workers in the mill and estates, they mentioned the company had kept their passport on their concern.

Sighted in the Concern Letter to Management the following clause:

- i) I have the choice keeping my own passport or authorizing my employer to safe keep my passport on my behalf.
- ii) Clause no 4, I can inform my employer if I wish to change my option at any time to either keep my passport or allow my employer to keep my passport.

The audit team did not receive and feedbacks or grievance from workers, that their wages being hold due to debt bondage.

Status: Comply

6.7

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

The responsibility and accountability to ensure Safety & Health at each operating unit lies with the respective Manager. He is assisted by his nominated Assistant Manager and other OSH Committee members representing Employer and Employee of Each Operating Unit.

OSH Meeting being conducted quarterly and chaired by OSH Chairman or Manager. The Assistant Manage/ Chief Clerk as Secretary and attended by Worker's Representatives and Management Representatives. The meeting conducted as

below:

Estate / Mill	Meeting 1	Meeting 2	Meeting 3
Kok Foh	18/12/2019	24/3/2020	10/6/2020
Pertang	26/12/2019	18/3/2020	16/6/2020
Kok Foh Mill	3/1/2020	8/5/2020	6/8/2020
St Helier	24/12/2020	27/3/2020	10/7/2020

Among the discussed agendas were Safety report for AP, Accident report, SW Report, Workplace inspection report, etc.

Sime Darby Sustainability and Quality Management (SQM) has established Sustainable Plantation Management System, Standard Operating Procedures of Incidents, Accidents & Non-Conformance Management, Doc No: SDP/SQM(ESH)001-2-9, Revision 1, Date: 30th May 2019. Accident and emergency procedures available in English and Bahasa Malaysia have been communicated to employees, vendors and other external stakeholders. The emergency respond plans covers on riot, in the event any accident, in case of chemical spillage, in the event of fire and flood.

Records of all accidents are kept and periodically reviewed during Safety & Health Committee meeting. All operating units maintained on file JKPP 6 & 8 forms. Based on the JKPP8 report submitted, there was 3 Major accident occurred in Kok Foh Estate which caused the lost of 81 mandays work.

List of first aiders are available in all mill and estates. Each 1st Aid Kit is handled by a respective appointed person. The details as listed herein: -

Estate	No of 1 st Aid Box	Location
Kok Foh	10	Office, AP Post, Workshop, Stores, Fields Activity
Pertang	7	
Kok Foh Mill	10	Office, laboratory, grading, store, workshop, boiler, compost, AP post and canteen
St Helier	19	Office, store, Nest, AP post, Field

First Aider for the Kok Foh Estate & Mill is Muhammad Khairul Anwar bin Abdul Hamid (Medical Assistant) who attended the Diploma Medical Assistant conducted by Kolej Islam Sains & Technology, Bachok in 2008. In St Helier, the certified first aider is En. Nor Azlan bin Abu Bakar, the Hospital Assistant under Registration No Q 1984 approved on 3rd May 2010.

Appropriate Personal Protective Equipment (PPE) for the job undertaken by the workers involved were provided free of charge by the company. Suitable PPE provided is based on the information in the SDS and CHRA assessor's recommendation.

Sighted the PPE issuance list based on work type, such as sprayer and chemical storekeeper (N95 respirator, apron, nitrile glove, rubber boot, safety spec), chemical mixer (safety helmet, apron, safety spec). List of distribution of PPE well established and training records on PPE use sighted.

Field visit observed the workers (harvesters) wearing safety helmet and safety boots. The estate has a PPE washing, storing and a shower room for sprayers which facilitate the workers to self-clean before returning home. The SDS seen effectively displayed in the chemical store. The chemical and premixing store seen with sumps that holds any waste water or pesticide contaminated water. Clothing room and lockers are provided for the workers to change their clothing before and after daily routine work.

Medical care is provided to all employees. Local workers are covered under Employees' Social Security Act 1969 (Act 4) while foreign workers are covered under Employment Injury Scheme Act 2017 (Act 800). There is a clinic available in Kok Foh, St Helier and Pertang Estate which administrating by Hospital / Medical Assistant. For critical and emergency, the workers to be refer to nearest panel clinic or Government Hospital.

Occupational injuries and LTA are monitor by the Hospital Assistant at Estates and Mill. Records on Lost Time Accident (LTA) metrics at mill/estates had been verified and JKPP 8 been submitted to DOSH in timely manner.

Estate	Date Submission of JKPP 8	No of Cases	LTA
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	Kok Foh	23/1/2020	3	81																																											
	Pertang	15/1/2020	0	0																																											
	Kok Foh Mill	24/1/2020	0	0																																											
	St Helier	9/1/2020	0	0																																											
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.																																															
<p>Sime Darby Plantation Berhad has established Agriculture Reference Manual (ARM) – Section 15 – Plant Protection. Issue No : 1, Year : 2011, Version : 3, Issue Date : 1st July 2011. The ARM has contained information regarding the implementation of IPM.</p> <p>All samples estate have established an IPM Plan including Rat census, Barn Owl and Bagworm census, Beneficial Plant establishment and Rhinoceros beetle Census. The IPM plan and implementation status has been prepared by the Assistant Manager and verified by Estate Manager in the respective estates.</p> <p>The census data determined the Management Action Plan to combat the pest as well as the success of the Integrated Pest Management programmed and biological control. Action will be taken once the census data above the threshold level as stated in the ARM.</p> <p>All the operating units audited have established their own IPM Plan. For example in Kok Foh Estate, the IPM sighted as table below:</p>																																															
<table border="1"> <thead> <tr> <th colspan="6">Aspects</th></tr> <tr> <th>Management Plan</th><th>Objectives</th><th>Category</th><th>Types / Location</th><th>Action</th><th>Frequency</th></tr> </thead> <tbody> <tr> <td>Rat damage census</td><td>To identify the impact of rat infestation to oil palm bunches</td><td>Operation</td><td>P & D</td><td>2 census rounds / years</td><td>Annually / As and when necessary</td></tr> <tr> <td>Rat baiting campaign</td><td>To mitigate rat infestation population below acceptable 5% threshold</td><td>Operation</td><td>P & D</td><td>2 baiting campaign / year</td><td>Annually</td></tr> <tr> <td>Bagworm census</td><td>To identify the impact of bagworm infestation to all palm frond</td><td>Operation</td><td>P & D</td><td>2 census rounds / months</td><td>As and when necessary</td></tr> <tr> <td>Trunk injection</td><td>To mitigate bagworm infestation population below acceptable 5% threshold</td><td>Operation</td><td>P & D</td><td>When census above 5% live bagworm</td><td>As and when necessary</td></tr> <tr> <td>Beneficial plan propagation</td><td>To control bagworm by planting 2 dm/Ha Cassia, Antigonon and Tunera</td><td>Operation</td><td>P & D</td><td>Refer FY 2020 work program</td><td>As and when necessary</td></tr> </tbody> </table>						Aspects						Management Plan	Objectives	Category	Types / Location	Action	Frequency	Rat damage census	To identify the impact of rat infestation to oil palm bunches	Operation	P & D	2 census rounds / years	Annually / As and when necessary	Rat baiting campaign	To mitigate rat infestation population below acceptable 5% threshold	Operation	P & D	2 baiting campaign / year	Annually	Bagworm census	To identify the impact of bagworm infestation to all palm frond	Operation	P & D	2 census rounds / months	As and when necessary	Trunk injection	To mitigate bagworm infestation population below acceptable 5% threshold	Operation	P & D	When census above 5% live bagworm	As and when necessary	Beneficial plan propagation	To control bagworm by planting 2 dm/Ha Cassia, Antigonon and Tunera	Operation	P & D	Refer FY 2020 work program	As and when necessary
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<p>According to Kok Foh Estate record, there is a total of 103.70 Dm pf beneficial plants have been planted as the dated of audit. Based on the field observation, there is no significant pest incidence attack and outbreak record in the Kok Foh Estate therefore no action is required to further carry out any P&D treatment in the estate. All the sample estates have documented their P&D data in the specific form and map according to Company's SOP's, which are available in the respective estate during the audit assessment.</p>																																															

Based on the interview with person in charge of Sustainable Department Sime Darby Plantation Group, they are aware and knowledgeable with the Global Invasive Species. The source of reference is through website (www.iucngisd.org and www.cabi.org). Presently no invasive species has been identified in both estates.

The company has recognized the inherent value of forests and the ecosystem services they provide as well as the scarcity of natural resources and threats from climate change. Sighted Group Sustainability & Quality Policy Statement signed by Mohamad Helmy Othman Basha, Group Managing Director dated 2nd December 2019. All the company's activities will be guided by a precautionary approach and a no deforestation objective. It was confirmed through site visit, there is no use of fire for pest control in all estates.

Status: Comply

7.2

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

All chemicals used in the estate operations are listed down in "Register of Chemicals Hazardous to Health". The list was prepared by the Assistant Manager and verified by the Estate Managers respectively. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species. Sighted the chemical used in the respective estates for spraying activities as below;

No	Estate	Activities and Dosages
1	Kok Foh	Spraying : 1. Wet & Stick 747 2. Glyphosate Isopropylamine 41% 3. Glufosinate Ammonium 24.5% 4. 2-Dimethyl Cyclopropane 5. Sodium Chlorate
2	Pertang	Spraying : 1. Glyphosate Isopropylamine 41% 2. Triclopyr Butoxy Ethyl Ester 3. 2-Dimethyl Cyclopropane 4. Metsulfuron Methyl 5. Glufosinate Ammonium 24.5%

Records of pesticides used (including active ingredients used and area treated, amount of active ingredients applied per ha and number of applications) were established and available for verification through bin cards, work program, chemical register, field-cost books and in progress reports. As evidence, sighted pesticide application program for year 2020 in the respective estates. Records of chemical usage was recorded in the costing book and well maintained by estate management as follows;

1. In Kok Foh Estate, sample the pesticide Metsulfuron Methyl + Triclopyr Butoxy Ethyl Ester usage records for circle sprays at Block 2017B for the period from 28th April 2020 – 30th April 2020 using 3gm + 60ml and cost per ha is RM 30.00 / Ha.
2. In Pertang Estate, sample the pesticide Glyphosate + Metsulfuron Methyl Ester usage records for circle sprays at Block 2015A for the period from 15th May 2020 – 19th May 2020 using 200ml + 50ml and cost per ha is RM 25.47 / Ha.
3. In St. Helier Estate, sample the pesticide Glyphosate + Metsulfuron Methyl Ester usage records for circle sprays at Block 2004AJ for the period from 17th August 2020 – 20th August 2020 using 200ml + 50ml and cost per ha is RM 33.00 / Ha.

Sime Darby Plantation Berhad Group is committed to minimize the usage of agrochemicals by implementing IPM in all samples estate by implementing these methods:

1. To maintain progressive planting of Tunera Subulata, Cassia cobanensis, Antigonon leptopus at immature area
2. To conduct census on barn owl box and ensure its occupancy rate at optimum level.

The management encourage establishment of biological control as per IPM plan. The implementation in the field is consistent with the SOP operation Guidelines in Integrated Pest and Disease management of oil palm and part of strategic to minimize the usage of pesticides.

No prophylactic use of pesticides had been carried out in all samples Estate. Blanket spraying was not in practiced and soft grasses being maintained in the field. In view of Estate practice, the insecticides are used only after a threshold level has been exceeded as per Agriculture Reference Manual Guideline (ARM).

Sighted latest chemical register in all samples estate / POM and it's confirmed that there is no Class 1A and 1B chemical has been used in the estate and POM operation.

Pesticides were handled, used or applied by trained Agrochemical Sprayers, Pre-Mixer and Mandore's. The Pesticide operators were given training on the safe handling and application of the pesticides as per the SDS of the pesticide. Pesticide operators have been provided with proper PPE. Observed during the site visit the PPE usage by the operators such as google, half face respirator, nitrile hand glove, rubber boot and apron were in place. The emergency shower and eye wash were verified to be available and in proper working order at the pesticide mixing area. All Estates having adequate facilities for mixing of pesticides and the emergency shower and eye wash were verified to be available and in proper working order at the pesticide mixing area. The PMU has adequate facilities for mixing of pesticides and cleaning up after work. There are suitable storage areas for PPE. cleaning up after work. There are suitable storage areas for PPE in the facility.

All estates have conducted training to staffs and workers particularly on the subject of chemical handling. The training was recorded in the various trainings record, complete with attendance records, training materials and photographs of the training. The record of training provided to the sprayer as below;

Kok Foh Estate:

- Training on chemical spillage training / PPE Training/ Chemical Handling Training by SQMO (Sustainability Quality Management Officer) on 5th Septemembr 2019 attended by 12 including store keeper and sprayer. Sighted the tranning material with attendance.
- Training on HIRARC, Safety Committee Refresher Training & Waste Management by SQMO (Sustainability Quality Management Officer) on 25th July 2019 attended by 18 including Assistant, Staff and MA. Sighted the training material with attendance.

Pertang Estate

- Training & SOP chemical sprayer by SQMO (Sustainability Quality Management Officer) on 19th February 2020 attended by 9 including staff and sprayer. Sighted the training material with attendance.
- Training on scheduled waste handling by SQMO (Sustainability Quality Management Officer) on 19th February 2020 attended by 9 including Assistant, Staff and store keeper Sighted the training material with attendance.

Site inspection to the storage facilities evidence that all pesticides are stored in an appropriate manner as follows: -

1. All pesticides are labelled with original labels.
2. Safety Data Sheet (SDS) for all the chemical sighted and updated.
3. All stores were secured under lock and key with restricted access.
4. Provision of ventilation fan.
5. Display of Safety Pictorial poster, namely the required PPE and chemical Safety hazards pictogram.

Sighted the unused empty chemical containers that were triple rinsed and pierced 3 holes at the bottom and kept at Empty Chemical Container Store in the respective estates. The empty pesticide container has been used for premix of chemical or disposed as Recycle waste to third party as listed below;

No	Estate	Quantity Disposed	Disposed Item	Date Collected	Collector
1	Kok Foh	4,550 kg	Fertilizer bag	3 rd April 2019	SS Setia Technology Enterprise
		200 pc	Empty Pesticide Container	4 th April 2019	
		848 pcs	Empty Pesticide Container (Tin)	4 th April 2019	
		18 kg	Botol pesticide	4 th April 2019	
2	Pertang	1,430 kg	Fertilizer bag	1 st September 2020	SS Setia Technology
		46 pc	Empty Pesticide Container	1 st September 2020	

		132 kg	Box / Paper	1 st September 2020	Enterprise
		7 pcs	Empty Pesticide Container (Tin)	1 st September 2020	
		12 kg	Botol pesticide	1 st September 2020	
3	St. Helier	3,100 kg	Empty Pesticide Container	18 th February 2020	SS Setia Technology Enterprise

Annual health surveillance for all pesticide operators in all samples estate and POM had been implemented in accordance with OSHA USECHH 2000 requirements in the Chemical Health Risk Assessment. The assessment has been done by OHD Dr. Tan Tiong Ping (JKPP HIE 127/171-2(160)) for all samples estate and Dr. The Teong Beng (JKPP HIE 127/171-2(166)) for Kok Foh Palm Oil Mill. Sighted the CHRA Report for Kok Foh Estate which has been carried out on 2nd July 2015 - (GST/CHRA/NS1/KokFoh/2015-257).

No work with pesticides is undertaken by persons under the age of 18, pregnant or breast-feeding women. Verified from records, field inspections and interviews that no pregnant or breast-feeding woman had been offered work as pesticide operator. The record in the medical surveillance has confirmed that no female worker employed to carry out pesticides' activities. Sighted memo issued by the respective Estate Manager regards of "No work with pesticide for Confirmed Pregnant and Breast Feeding worker". As evidence, the memo was displayed on the notice board estate's and in front of office's.

Status: Comply

7.3

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

Sighted the waste management plan year 2020 incorporated in the Environment Management Plan prepared by Assistant Manager and verified by Estate and POM Manager respectively. Sources of pollution and waste have been adequately identified by all samples estate and POM. Generally, the wastes identified were of general, recyclable and scheduled wastes.

It had listed the waste product, sources of pollution, mitigation measures, target, and person responsible. Among the wastes that were identified include domestic wastes from household, scrap iron, empty chemical containers, scheduled wastes as listed below;

1. Schedule waste (Used lubricants, Used hydraulic oil, used batteries, etc)
2. Domestic waste (Rubbish from housing area, mill office, etc)
3. Recycle waste (Used fertilizer bags, used chemical containers, used paper, etc)

Sighted the Fifth Schedule (Regulation 11) Inventory of Scheduled waste, all the estates have shown their compliance toward the Environmental Quality Act 1974 (Schedule Wastes) Regulations 2005. Summary record of the waste dispose as below: -

1. Kok Foh Oil Mill

SW Code	SW Items	Date Generated	Quantity	Date Disposed
110	Electrical Waste	Aug 2020	0.020	July 2020
305	Lubricating Oil	Aug 2020	0.238	Aug 2019
306	Hydraulic Oil	-	-	Aug 2019
322	Isopropyl Alcohol	Aug 2020	0.010	July 2020
324	Hexane	-	-	July 2020
410	Oil Filter	Aug 2020	0.003	July 2020

2. St. Helier Estate

SW Code	SW Items	Date Generated	Quantity	Date Disposed
404	Clinical waste	Aug 2020	1.0001kg	March 2019

3. Pertang Estate

SW Code	SW Items	Date Generated	Quantity	Date Disposed
404	Clinical waste	-	-	Aug 2020

4. Kok Foh Estate

SW Code	SW Items	Date Generated	Quantity	Date Disposed
305	Lubricating Oil	-	-	Sept 2020
306	Hydraulic Oil	-	-	Sept 2020
404	Clinical waste	-	-	Sept 2020
410	Filter contaminated	-	-	Sept 2020

The estates and POM have proper designated stores for the storage of all types of chemicals to ensure proper segregation and disposal. Training and briefing on scheduled waste have been planned and conducted to internal and external stakeholders by the respective estates and POM. Example sighted in Pertang Estate, training on scheduled waste handling by SQMO (Sustainability Quality Management Officer) on 19th February 2020 attended by 9 including Assistant, Staff and store keeper.

It was confirmed through site visit at housing complex, that no use of fire for domestic waste disposal. The domestic waste generated at worker housing has been collected by the contractor and disposed at the Landfill under Local Government Council.

NC (Minor)

7.3.1

Waste produced by the mill (leachate) from EFB storage area was not identified in the Waste Management Plan Year 2020.

7.3.1 Status: Non conformity with grade non critical

7.4

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

All sampled estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices consistently monitored by estate operation management and regional office. The recommendations for improvements are given to maintain the sustainable practices. Leaf analysis and foliar sampling will be monitored on yearly basis. Variable dosage recommendation was given by the agronomist for fertilizer input for all samples estate.

Sighted annual record Soil and Leaf Analysis for year 2020 covered under Agronomist report for all samples estate. Nutrients assessed were pH, Org.C(%), N(%), Total P (ppm), Available P (ppm), Exch. K (me%), Exch.Mg (me%) and C.E.C (me%). General comment by Agronomist during visit to the respective estates. All samples estate have Large portion of good soil series which is friable and well drain. This soil has limitation in its water holding capacity and tend to dry fast. Thus. Moisture conservation practices such as maintaining LCC, U shape frond arrangement, maintaining soft grass & nephrolepis and judicious spraying are very important to minimize soil moisture loss. Further improvement in manuring, pruning, crop recovery and rat management are also require to ensure yield improvement.

Leaf nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf analysis and leaf sampling is conducted annually. The foliar sampling and soil analysis reports by the company's agronomist were available at the estates during the audit assessment. The agronomist report also emphasized on field best practices and physical condition such palm appearance, canopy size and vigour, canopy colour and vigour, palm circle and inter row condition. Nutrients assessed were Na, N, P, K, Ca, Mg, B (PPM). The leaf sampling was carried out in all samples estate and the result are documented in the report.

Kok Foh Palm Oil Mill do have a plan for nutrient recycling strategy by sending the POM waste such as POME and EFB to the estate. Sighted the records for EFB distribution to the estate. Based on the interview with Assistant Manager POM, it has been confirmed that Kok Foh Estate is the only estate applying EFB and POME as in organic fertilizer. The record EFB / POME discharge to estate as below;

Estate: Kok Foh Estate

Inorganic Fertilizer	Actual application (todate August 2020)
Empty Fruit Bunch (MT)	18,434.05
POME (Liter)	41,600.47

Fertilizers in all samples estate were applied according to agronomist recommendation. The records have the information about application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. Types of fertilizer applied were of straight and mixture. The records were maintained and update accordingly. Verification of various documents in all samples estate such as agronomist report, annual manuring program and store issuance records shown that the inputs of fertilizers to the field were accurate. Example record verified in Kok Foh Estate (Sample Block : PM 1999KC, 77.33Ha – 135 palm / Ha):

Recommendation from Agronomist	Fertilizer Type : AC – 1.75kg / palm – Feb 2020 MOP – 1.50kg / palm – March 2020 Kieserite – 1.00kg & 1.25kg / palm – April 2020 NKC – 2.75kg & 3.00 / palm – Sept / Dec 2020
Actual Application by estate operation	Fertilizer Type : AC – 1.75kg / palm – May 2020 MOP – 1.50kg / palm – July 2020 Kieserite – 1.00kg & 1.25kg / palm – August 2020 NKC – 2.75kg & 3.00 / palm – Target to apply in Sept 2020

Status: Comply
7.5
Practices minimise and control erosion and degradation of soils.

Soil surveys and topographic information, including the identification of steep terrain, marginal and fragile soils was available. Sighted the soil series available in soil maps and there was no soil categorized as problematic or fragile soil in all samples estate.

No planting of oil palm on steep slopes (>25 degrees) in the estate as per company policy signed by Mohamad Helmy Othman Bash, Group Managing Director dated 2nd December 2019. Sighted Slope & Manuring Block Map has been prepared by R&D – Precision Agriculture Unit (EIM). It's confirmed that all the planted area is below than 25 degree and this was sighted during the field visit at all sampled estates.

To prevent and minimize erosion from planting and replanting activities in slopes, the followings practices have been drawn-up:

1. Minimize use of heavy machinery particularly during wet weather to avoid soil compaction.
2. Construct contour terraces for slopes > 15 degrees (especially in steep area) and platform in undulating areas.
3. Construct adequate under-passes, hump & silt pits.
4. To ensure that leguminous covers crop is established promptly after the land preparation work has been completed.

Based on the site visit to both estates, no new planting was observed at the steep terrain in all estates.

Status: Comply
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.

No new plantings in all the estates.

Status: Comply
7.7
No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.

No new planting on Peat at all sampled estates.

Status: Comply

7.8

Practices maintain the quality and availability of surface and groundwater

All the estates and mill audited have established Water management plan for year 2020. For example the plan in Kok Foh Estate is to monitor the source of water, description, management and monitoring plan to ensure the water are safe and protected. The source of water for domestic used in Kok Foh Estate is from treated water sourced from the own reservoir maintained by Kok Foh Palm Oil Mill. Other than domestic used, estate is using rainwater for general cleaning, gardening and etc. Sighted Final report drinking water analysis conducted by ECOLAB showing the treated water is safe to consume.

Analysis Test	Test Method	Total	WHO Standard
True Color	APHA 2120C	2 Pt-Co	15
Conductivity at 25°C	APHA2510B	160 uS/cm	-
Cyanide (CN)	APHA 4500-CN C&E	< 0.01 mg/L	-
Total Hardness by Calculation (CaCO ₃)	APHA 3120B/234-B	36 mg/L	-
Anionic Surfactants (MBAS)	APHA 5540C	0.01 mg/L	-
Oil and Grease – Total	APHA 5520D	< 0.5mg/L	-
pH@25°C	APHA 4500-H-B	7.6 pH Units	6.5 – 8.5
Phenol (C ₆ H ₅ OH)	APHA 5530 B & C	< 0.001 mg/L	-
Total Suspended Solids @ 105°C	APHA 2540D	6 mg/L	-
Total Dissolved Solids @ 180°C	APHA 2540C	120 mg/L	1000 mg/L
Turbidity	APHA 2130B	0.70 NTU	5

The management plan for conserving its river buffer zone such as:

1. To erect proper signboard at strategic points along the boundary to riparian zones
2. To erect riparian Zone signboard.
3. To identify location of river / stream in the Estate map
4. To paint with red & white bands on frond butt / trunk of every alternate palm bordering the riparian zone.
5. Fertilizers and herbicides are prohibited.
6. To monitor rainfall data.

There are rivers passing through the estate land as follows;

1. Kok Foh Estate is Sg. Tebu Estate
2. St. Helier are Sg. Muar and Sg. Juaseh

Sighted the demarcate of buffer zone / riparian area using red and white paint and the proper signboard of NO spraying and manuring activities along the area. There are NO bunds or dams constructed across the rivers

The POM applies the biological system with multiple ponds in series for its treatment of effluent. The quality of discharged effluent was analysed every month and the parameters are pH, BOD₃, COD, TS, SS, OG, AN and TN. Sighted latest POM effluent analysis date from 28th July 2020 as below; Result at the final discharge is according to Akta Quality Alam Sekitar 1974 and compliance with Jadual Pematuhan issued by Department of Environmental valid from 1st July 2020 till 30th June 2021.

The mill water consumption was measured by flowmeter and recorded in "Summary of Consumption Water/MT FFB" as follows;

Month	Water Used (Liter)	FFB Process (MT)	Water Used / MT FFB
January	4,420.00	9,547.00	0.46
February	5,780.00	14,669.00	0.39
March	7,250.00	17,708.00	0.41
April	8,870.00	19,893.00	0.45
May	7,550.00	18,672.00	0.40

	June	8,460.00	23,441.00	0.36
	July	9,370.00	19,317.00	0.49
	August	12,620.00	20,329.00	0.62

	Status: Comply	
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7.9
Efficiency of fossil fuel use and the use of renewable energy is optimised.

Sighted the plan for improving efficiency of the use of fossil fuels and to optimize renewable which incorporated in the Environmental Management Plan in the respective estates.

Monthly record of energy consumption for non-renewable and sources were kept and documented. It is monitored to optimize use of renewable energy. Record for Diesel consumption for respective estates for year 2020 have been verified by the auditor. To-date data as per documented by each estate:

1. Kok Foh Estate (2.39 Liter/MT FFB)
2. Pertang Estate (0.68 Liter/MT FFB)
3. St. Helier Estate (1.03 Liter/MT FFB)

	Status: Comply	
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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.

Identification of significant pollutants and greenhouse gas (GHG) emissions has been done e.g. Land conversion, Emissions from Fertilizer, Emissions from peat, Fuel Consumption, and crop sequestration. Their usage have been recorded and documented at each of the operating units. Approved GHG calculator, Palm GHG was used for the calculation during implementation period. Identification of significant pollutants and greenhouse gas (GHG) emissions has been conducted for the followings: -

1. Land conversion,
2. CO₂ Emissions from Fertilizer,
3. N₂O Emissions from peat,
4. N₂O Emissions from Fertilizer
5. Fuel Consumption
6. Peat Oxidation
7. Crop sequestration.

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

Summary of Net GHG Emissions

Emissions per Product	tCO ₂ e/tProduct
CPO	1.15
PK	1.15

Extraction	%
OER	20.78
KER	5.11

Production	t/yr
FFB processed	222,240.33
CPO Produced	46189.19

Land use	ha
OP planted area	15988.67
OP planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	15988.67

Summary of Field Emissions and Sinks

	Own Crop		Group		3rd Party	
	tCO ₂ e	tCO ₂ e	tCO ₂ e	tCO ₂ e	tCO ₂ e	tCO ₂ e

		/tFFB		/tFFB		/tFFB
Emissions						
Land Conversion	20333.11	0.47	327.28	0.44	0	0
*CO ₂ Emissions from Fertiliser	1974.20	0.05	38.40	0.05	0	0
**N ₂ O Emissions	39,10.09	0.03	24.36	0.03	0	0
Fuel Consumption	557	0	2.87	0	0	0
Peat Oxidation	0	0	0	0	0	0
Sinks						
Crop Sequestration	- 68,395.52	-0.44	-310.21	-0.42	0	0
Conservation Sequestration	0	0	0	0	0	0
Total	15,311.08	0.10	82.71	0.11	0	0

Summary of Mill Emissions and Credits

	tCO ₂ e	tCo ₂ e/tFFB
Emissions		
POME	43562.87	0.20
Fuel Consumption	55.12	0.00
Grid Electricity Utilisation	582.20	0.00
Credits		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	44200.18	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

All the figures were tally and accurate between GHG RSPO Calculator Version 4 and Manual record in the respective estates and POM.

There was no proposed development area in the SOU 16 Kok Foh Palm Oil Mill. Hence, no New Planting.

The significant pollutants and greenhouse gas (GHG) emissions had been identified and documented and plans to reduce or minimize were being implemented. All the samples estate and POM have identified all the process / area of activity in the estate and documented the other significant pollutants in Environmental Management Plan Year 2020. The plan has been prepared by Assistant Manager and verified by Estate / POM Manager respectively. The Environmental Management Plan include:

1. Environmental Risk Management Plan
2. Waste Management Plan
3. Water Management Plan

4. HCV Management Plan
5. Pollution Prevention Plan
6. Chemical Reduction Plan
7. Energy Management Plan

Status: Comply

7.11

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

It was confirmed through site visit, there is no use of fire for in all estates during replanting as per emphasised in Group Sustainability & Quality Policy Statement signed by Mohamad Helmy Othman Basha, Group Managing Director dated 2nd December 2019.

Seen Fire Drill with ERP and Fire Fighting organization in both estates. Sighted the emergency procedure for all Estates. Emergency response plan available in local language (Malay and English). The ERP has been explained to all workers and staffs during training. 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.

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.

This indicator is not applicable as no new planting exist within SOU 16 Kok Foh Palm Oil Mill certification unit.

7.12.2

For all sampled estates, Sustainability Department is in-charge on HCV Assessment. The Sime Darby Plantation Berhad is periodically reviews HCV re-assessments and the last HCV review was conducted in May 2016 as outlined in the In House High Conservation Value Area Assessment document.

Based on document verification, the identification of RTE species has taken into consideration on the IUCN Red List, CITES and the Red List of Mammals for Peninsular Malaysia published by the Department of Wildlife and National Park Peninsular Malaysia (DWNP), 2010. In-House HCV Assessment is carried out by a Team that has the competency of identifying HCV. The team member has been exposed to the external HCV assessment.

The Methodology and participatory used in the assessment process comprise of the following steps:

1. Team formation and briefing on project scope.
2. Compilation of secondary and available primary data, including preliminary stakeholders consultation.
3. Fieldwork and primary data collection – physical inspection, site observation, internal and external stakeholder consultation.
4. Data analysis and interpretation
5. Preparation of full report and map
6. Critical review of draft report between team members
7. Revise report and finalize (final)

Sighted the In – House High Conservation Value Assessment Re assessment for SOU 16 Kok Foh Palm Oil Mill prepared by PSQM Department, Sime Darby Plantation Sdn. Bhd., dated March 2016. The HCV as follows;

Estate	Assessment Area	Ha	Present HCV
Muar River Estate	Water Catchment	0.45	HCV 4
Sg. Senarut Estate	Water Catchment	3.94	HCV 4
Sg. Gemas Estate	Water Catchment	1.28	HCV 4
	Pond	0.50	HCV 4
Kok Foh Estate	Water Catchment	7.5	HCV 4
	River Reserve (Sg. Tebu)	0.448	HCV 4
Bukit Pilah Estate	Water Catchment	4.88	HCV 4
	Water Catchment	0.80	HCV 4

	Water Catchment	2.05	HCV 4
	Water Catchment	0.26	HCV 4
St. Helier Estate	River Reserve (Sg. Muar)	0.56	HCV 4
	Water Catchment	0.30	HCV 4
Sg. Sabaling Estate	Water Catchment	2.56	HCV 4
Pertang Estate	Water Catchment	0.07	HCV 4
Total of HCV for SOU 16		25.598	

The HCV report for SOU 16 Kok Foh Palm Oil certification unit has been conducted by Ms Nur Aida Ab. Gani (Field Assessor / Report Writer) and Norsyamimi Saifullizam (Field Assessor). Sighted the HCV management plan year 2020 incorporated in the Environment Management Plan prepared by Assistant Manager and verified by Estate Manager respectively. Example plan that has been verified in Kok Foh Estate:

Objective	Category	Type / Location	Actions	Frequency
To promote awareness on HCV	HCV Assessment Report	Sg. Tebu	Muster briefing to include HCV related (policy & legal compliance of capture)	Quarterly
To identify how tasks relating to HCV / biodiversity area to be performed and competencies required		Water Catchment Area	Competencies / Awareness training on how to manage HCV at estates (management implantation by Department of Wildlife)	Annually
To manage human wildlife conflict			Warning signage prohibiting illegal activities such hunting, fishing, cutting of protected flora	As and When Needed
To maintain / enhance the biodiversity in the estate				As and When Needed

Status: Comply

3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
ASA 1.4	Kok Foh POM – SOU16 does not use the RSPO trademark both in the on-product and off-product.	✓
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or√
ASA 1.4	Kok Foh POM – SOU16 does not use the RSPO trademark both in the on-product and off-product.	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or√
ASA 1.4	Kok Foh POM – SOU16 does not use the RSPO trademark both in the on-product and off-product.	✓
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or√
ASA 1.4	Kok Foh POM – SOU16 does not use the RSPO trademark both in the on-product and off-product. The company has SOP for this matter - Standard Operation Procedure for Sustainability Supply Chain and Traceability (issue date: April 2019)	✓
	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>Company Group/Holding Statement: 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>Auditor Verification: 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>Company Group/Holding Statement: HCV assessment has been conducted for uncertified units i.e. PT Mitra Austral Sejahtera (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p> <p>Auditor Verification: Sime Darby Plantation Bhd sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2nd revision on 24 June 2016. Current status of LUCA report of SDP Bhd is 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 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress. *Note: RSPO NPP Announcements for SDP can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14</p> <p>Auditor Verification:</p> <ul style="list-style-type: none"> • Karya Palma Estate (PT Sandika Natapalma) and Baturus Estate (PT Budidaya Agro Lestari) any new planting after January 1st 2010 and due to not conduct NPP. • RSPO NPP process has been completed in 2011 for a new mill in Liberia.
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>Company Group/Holding Statement: Sime Darby (Liberia) Plantation Inc. Status: Box G – Close for Monitoring Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/46</p> <p>Auditor Verification: 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>Company Group/Holding Statement: No stakeholder comments or complaints received.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are no labour dispute in company unit.</p>
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>Company Group/Holding Statement: None noted. No stakeholder comments or complaints received.</p>

	<p>Criterion 4.2 in P&C 2018).</p>	<p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There is any legal non-compliance for company under SDP waiting for land title process, i.e.:</p> <ul style="list-style-type: none"> • PT Sime Indo Agro 1,652 Ha • PT Aneka Inti Persada 421.31 Ha • PT Bina Sains Cemerlang 308.25 Ha • PT Bersama Sejahtera Sakti 765 Ha • PT Langgeng Muaramakmur 1,162 Ha • PT Paripurna Swakarsa 1,120 Ha • PT Swadaya Andika 63 Ha • PT Bahari Gembira Ria 1,639 Ha • PT Guthrie Pecconina Indonesia 4,133 Ha • PT Perkasa Subur Sakti 1,286 Ha
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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.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Non-Conformance Description & Evidence observed (filled by auditor): There is no NC Finding During Assessment					
Root Cause Analysis (filled by organization audited):					
Correction (filled by organization audited):					
Corrective Action (filled by organization audited):					
Assessor Evaluation and Conclusion (filled by auditor):					
Verified by	:				

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

NCR No.	: 2020.01	Issued by	: Mohd Fadzli Bin Bistamam
Date Issued	: 10 September 2020	Time Limit	: Next Surveillance
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 3.3.2 - A mechanism to check consistent implementation of procedures is in place.		
Evidence observed (filled by auditor): Kok Foh Palm Oil Mill 1. Based on site verification, 3 out of 10 First Aid Box namely at FFB Ramp, Supervisor Room and Workshop was insufficient and issues & replenishment of the 1 st Aid items are not recorded as per SOP for Primary Health Care Services in Plantation (Doc. No: SD/SDP/PSWM(ESH)202-OH14), 3.7.1: First Aid Kit (item no. 4 & 6). 2. With reference to Standard Operating Procedure (SOP) 7 – Depericarping Station, Clause G – Cleanliness of the nut polishing drum and the surrounding area is the responsibility of the Kernel Station Operator. Evidence, oil from the sprocket dropped on the floor and flowing into the drain.			
Non-Conformance Description (filled by auditor): Non – Compliance to Company's Standard Operating Procedure.			
Root Cause Analysis (filled by organization audited): 1. Lack of monitoring on items replacement in First Aid Box. 2. Lack of monitoring on the cleanliness of polishing drum			
Correction (filled by organization audited): 1) The missing item has been replenished and recorded in the movement 2) The station has been cleaned immediately after the visit			
Corrective Action (filled by organization audited): 1. To train on the SOP, to do regular check on items and replenished the items at the end of the day. To enforce the records of the movement of the items 2. To do cleaning and inspection every morning by the Process Supervisor, that there is no oil spill on the floor			
Assessor Evaluation and Conclusion (filled by auditor): All evidence related to this NC will be verified during next year audit. This minor NC is still open.			
Verified by	:		

NCR No.	: 2020.02	Issued by	: Mohd Fadzli Bin Bistamam
Date Issued	: 10 September 2020	Time Limit	: Next Surveillance
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
Evidence observed (filled by auditor): Kok Foh POM • Waste produced by the mill (leachate) from EFB storage area was not identified in the Waste Management Plan			

Year 2020. <ul style="list-style-type: none"> During site visit to Kok Foh POM workers' housing complex, sighted that the domestic waste such as plastic bottle, non-biodegradables plastic bag, paper box and can was not disposed according to the Palm Oil Mill's Waste Management Plan.
Non-Conformance Description (filled by auditor): Waste Management Plan was not effectively monitored and identified.
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none"> Lack comprehensive monitoring due to compost plant no longer operating under Mill management There is lack of awareness on housing complex hygiene by new foreign workers.
Correction (filled by organization audited): <ul style="list-style-type: none"> To direct the leachate to ETP Pond. The waste has been collected at disposed immediately at designated area
Corrective Action (filled by organization audited): <ol style="list-style-type: none"> 1. Waste Management plan updated 2. Monitoring by weekly at the EFB yard 3. Photo – leachate sump from EFB Chute to ETP pond 4. To do briefing on waste management and to monitor continuously at site
Assessor Evaluation and Conclusion (filled by auditor): All evidence related to this NC will be verified during next year audit. This minor NC is still open.
Verified by : <div style="border: 1px solid black; width: 200px; height: 20px; display: inline-block;"></div>

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1		NIL
2		

3.4.4. Noteworthy Positive Components

No	Ref. Std.	Description
1		Good commitment from management
2		Has been certified MSPO (GGCSDP001-MSPO-00-2018 for estate and GGCSDP002-MSPO-00-2018 for mill)
3		The mill area is clean & well manage.
4		Good documentation system.

5		The understanding of interviewed workers on sustainability policies are good.
6		Workers line-site management, basic facilities and signage are good.

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Local Contractors <ul style="list-style-type: none"> • They have good understanding about RSPO. • He is clear that if he employs a worker, he has to officially inform estate management. He also knows the working hours, minimum salary, SOCSO & EPF (for local workers) that must be paid as he has been briefed in the Stakeholders meeting. • They informed that the payments were made promptly without any delay. Contract agreement were signed prior commencement of work. 	Positive findings
Estate workers <ul style="list-style-type: none"> • RSPO awareness, company policy and SOP are briefed among workers during muster call. • Personal Protective Equipment are distributed free of charged by management. • They have good understanding about complaint and grievance mechanism. • They are very happy with the management and hopes to continue their contract for a long time. • Company well managing the welfare, health and safety of their workers. • Housing facilities is provided with water and electrical supply. • They have been treated equally without any discrimination. Their salary was according to Minimum Wage Order 2020. 	Positive findings
There was no feed-back received from NGO and External Stakeholders.	No issues raised.
Workers Union Representative Tele-conversation with Union Leader who has given all positive feedbacks and appreciate the estate management for strong support.	Positive findings
Liberty Shared There is a Petition from Liberty Shared submitted to U.S. Customs and Border Protection with 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 & treats.	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

Public Issues (Institution/ NGO/Community)	Auditor Verification
	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 & treats. However, sampled workers and staff during this audit does not resulted with positive against the statement.

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	<p>Formal Sign-off of Assessment Findings</p> <p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="text-align: center;"> <p>SOU 16 Kok Foh POM Management Representative</p> <p>THE CHINA ENGINEERS (MALAYSIA) SDN. BHD. KOK FOH PALM OIL MILL</p>  <p>..... ABDUL HALIM SHAHOR SENIOR MANAGER <u>Name</u></p> <p>Thursday, 24 September 2020</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Mohd Fadzli Bin Bistamam</u> Thursday, 24 September 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	Gender Committee of Sime Darby Kok Foh	Malaysia		Interview	07-10 Sept 2020	✓	
2	Contractors of FFB Transportation	Malaysia		Interview	07-10 Sept 2020	✓	
3	Sime Darby Foreign Workers Representative	Malaysia		Interview	07-10 Sept 2020	✓	
4	Mill Operator (FFB Grader, Boiler Fireman)	Malaysia		Interview	07-10 Sept 2020	✓	
5	Estate workers (Harvesters, Sprayers, Field Workers) & Estate Supervisors	Malaysia		Interview	07-10 Sept 2020	✓	

Appendix 2. Assessment Program

DATE	7 th – 10 th Sep 2020	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
6 th Sep 2020		
N/A	Travelling Day	
7 th Sep 2020 (Monday)		
08.30 – 09.00	Opening meeting Introduction by team leader	MFB, MRB, IBI
09.00 – 12.00	Document review (KOK FOH POM) <ul style="list-style-type: none">Document review [EIA, SIA, CIP, Business Plan]Complaint mechanism / Request & respondLegal RequirementsBest Practices & OSHLast year NC (s) verification Document review Supply Chain Certification Assessment of the POM (RSPO SCC) <ul style="list-style-type: none">Demonstration of legal entityRoles and responsibilityProcedures/manual/SOPRecord of purchase – RSPO certified productRecord of sales– RSPO certified product	
14.00 – 17.00	SITE VERIFICATION <ul style="list-style-type: none">Mill inspectionWorkshopsStoresPOM applicationSafety and Health / PPE / SignageWaste Management / EnvironmentWorkers interviewStakeholder consultation if required.RSPO SCC site implementation.	
8 th Sep 2020 (Tuesday)		
09.00 – 17.00	Document review (Kok Foh Estate) <ul style="list-style-type: none">Document review [EIA, SIA, CIP, Business Plan]Complaint mechanism / Request & respondBest agricultural practicesSafety and HealthLast year NC (s) verification Site verification <ul style="list-style-type: none">Best agricultural practicesManuring, Spraying, Harvesting,HCV / Conservation AreaLegal compliance / boundaryChemical / Pesticide / Fertilizer Stores	MFB, MRB, IBI

	<ul style="list-style-type: none"> Workers interview Worker's facilities (housing, pay, etc) Stakeholder consultation if required. 	
9th Sep 2020 (Wednesday)		
09.00 – 17.00	Document review (St. Helier Estate) <ul style="list-style-type: none"> Document review [EIA, SIA, CIP, Business Plan] Complaint mechanism / Request & respond Best agricultural practices Safety and Health Last year NC (s) verification Site verification <ul style="list-style-type: none"> Best agricultural practices Manuring, Spraying, Harvesting, HCV / Conservation Area Legal compliance / boundary Chemical / Pesticide / Fertilizer Stores Workers interview Worker's facilities (housing, pay, etc) Stakeholder consultation if required. 	MFB, MRB, IBI
10th Sep 2020 (Thursday)		
09.00 – 16.00	Document review (Pertang Estate) <ul style="list-style-type: none"> Document review [EIA, SIA, CIP, Business Plan] Complaint mechanism / Request & respond Best agricultural practices Safety and Health Last year NC (s) verification Site verification <ul style="list-style-type: none"> Best agricultural practices Manuring, Spraying, Harvesting, HCV / Conservation Area Legal compliance / boundary Chemical / Pesticide / Fertilizer Stores Workers interview Worker's facilities (housing, pay, etc) Stakeholder consultation if required. 	MFB, MRB, IBI
16.00 – 16.30	Preparation for closing meeting Additional field visits and meetings with managers as necessary.	
1630	Closing meeting <ul style="list-style-type: none"> Presentation of findings by the audit team NC closure dateline (if any) Questions and answers Final summary by team leader 	