

SIRIM QAS INTERNATIONAL SDN. BHD.

Building 4, SIRIM Complex, No. 1, Persiaran Dato' Menteri, Section 2, 40700 Shah Alam, Selangor, Malaysia.

RSPO PUBLIC SUMMARY

File Ref.: ES10171011

CLIENT

: SIME DARBY PLANTATION BERHAD - SOU 6 TENNAMARAM

PARENT COMPANY : SIME DARBY PLANTATION BERHAD

RSPO MEMBERSHIP NO.: 1-0008-04-000-00

LOCATION OF THE CERTIFICATION UNIT (MILL AND THE SUPPLY BASE): (In the case of multisite certification, list additional sites in attachments)

Certification	Mill and Supply	GPS I	ocation	Location
Unit	Base	Latitude	Longitude	Location
00110	Tennamaram POM	3°23' 44.30" N	101°25' 03.41" Ė	45600 Bestari Jaya, Selangor
SOU 6	Tennamaram Estate	3°24' 11.35" N	101°23' 59.24" E	45600 Bestari Jaya, Selangor
Tennamaram	Sungai Buloh Estate	3°18' 32.27" N	101°19' 07.23" E	45700 Bukit Rotan, Selangor
	Bukit Talang Estate	3°24' 09.15" N	101°18' 35.72" E	45000 Kuala Selangor

MAP: See Attachment 1 AUDIT DATE : 4-8 December 2017 18 auditor days **DURATION** TYPE OF AUDIT: **Annual Surveillance Audit No.2** Recertification Audit STANDARD: RSPO PRINCIPLE & CRITERIA MYNI 2014, AND RSPO SUPPLY CHAIN CERTIFICATION STANDARD 2014 SCOPE OF CERTIFICATION: Production of Sustainable Crude Palm Oil and Palm Kernel Using the Identity Preserved Supply Chain Model VALIDITY OF RSPO CERTIFICATE: 03 March 2016 - 02 March 2021 The following attachments form part of this report: Non-conformity Report(s) List of additional site(s) Acknowledgement by Client's Representative Report by Audit Team Leader KILANG KEL Name Mohd Zulfakar Kamaruzaman Name Signature Signature Pengurus Kilang Date 19 March 2018 Date

SUMMARY OF AUDITS

Stage 2 audit / Recertification audit								
On-site audit date		:	11 – 15/0	1/2016		No. of auditor days :	15	
Audit team		:	Ruzita Al	od Gani, M	ohd Razman Salin	n & Selvasinggam T. Kan	ndiah	
No. of major NCR		:	1 Indicator: 2.1.1				Closing date 11/3/2016	
No. of minor NCR		:	2	Indicator	1			
Indicate	the	:	Employees		Settlers	Villagers	Employees	
stakeholders			,	1		1	/	
interviewed during	the		Contract	workers	NGOs	Govt. agency	Contract workers	
on-site audit			,	1			/	
			Indigenous people		Contractor	Others (Ple	ease specify)	
			N	A	/			
Supply base sample	d	:	Sungai B	uloh Estat	e and Bukit Talang	Estate	•	

Annual Surveillance Aud	it 1						
On-site audit date	:	20-23/12/16			No. of auditor days :	14	
Audit team	:	Hazani Othma	an, Mo	hd. Zulfakar Kama	ruzaman, Rozaimee Ab	. Rahman, Selvasingam	
		T. Kandiah					
No. of major NCR	:	4 Ind	icator	:.4.4.2, 4.6.11, 4.7.	3, 6.9.1	Closing date : 6/2/2017	
No. of minor NCR	:	3 Ind	icator	: 2.2.2, 4.1.2, 4.7.5			
Indicate by ticking the	:	Employee	S	Settlers	Villagers	Employees	
stakeholders interviewed		V		NA	√	V	
during the on-site audit		Contract worl	kers	NGOs	Govt. agency	Contract workers	
		Indigenous pe	eople	Contractor	Others (Please specify)		
		NA			Union, Headmaster	-	
Supply base sampled	:	Tennamaram	(+ Elm	nina) Estate, Sunga	i Buloh Estate		
Changes since the last	:	Elmina Estate has been amalgamated into Tennamaram Estate as one of the division					
audit		known as the	known as the Elmina Division.				
Report approved by	:	Aminah Ang			Approval date: 17	/05/2017	

Annual Surveillance Aud	lit 2					
On-site audit date	:	4-8 Dece	mber 2017	,	No. of auditor days :	18
Audit team	:	Mohd Zu Amir Bah		naruzaman (LA), Ro	ozaimee Ab Rahman, S	Selvasingam T. Kandiah,
No. of major NCR	:	6	6 Indicator: 2.1.1, 4.1.1, 4.5.4, 4.7.2, 5.3.2 & D4.1 (Supply Chain)			Closing date : 8/2/2018
No. of minor NCR	:	1	1 Indicator: 4.1.2			
Indicate by ticking the stakeholders interviewed	:	Empl	oyees	Settlers	Villagers / Local communities	Suppliers
during the on-site audit			V		V	V
	Contract workers		NGOs	Govt. agency	Independent growers	
		Indigeno	us people	Contractor	Others (PI	ease specify)
		N	IA	√ √		

Supply base sampled	Tennamaram Estate and Bukit Talang Estate				
Changes since the last	No Changes				
audit					
Report approved by	Radziah Binti Mohd Daud	Approval date :	19/03/2018		

Annual Surveillance Aud	it 3					
On-site audit date	:				No. of auditor days :	
Audit team						
No. of major NCR	:		Indicator:			Closing date:
No. of minor NCR	:		Indicator:			
Indicate by ticking the		Emplo	yees	Settlers	Villagers / Local	Suppliers
stakeholders interviewed					communities	
during the on-site audit						
		Contract	workers	NGOs	Govt. agency	Independent growers
		Indigenou	s people	Contractor	Others (Pl	ease specify)
Supply base sampled	:					
Changes since the last	:					
audit						
Report approved by	:				Approval date :	

Annual Surveillance Aud	lit 4						
On-site audit date	:				No. of auditor	days :	
Audit team	:						
No. of major NCR	:		Indicator				Closing date
No. of minor NCR	:		Indicator	:-			
Indicate by ticking the stakeholders interviewed	:	Employee	es	Settlers	Villagers / communities	Local	Suppliers
during the on-site audit							
		Contract	workers	NGOs	Govt. agency		Independent growers
		Indigenou	ıs people	Contractor	Others (Please	e specif	y)
Supply base sampled	:						
Changes since the last audit	:						
Report approved by	:		•		Approval date	:	

SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period		Dec 2016 – Nov 2017	Dec 2017 – Nov 2018		
Certified FFB Processed (MT)		234,649.32	229,730.85		
Production of Certified CPO (MT)		45,417.42	48,243.48		
Production of Certified PK (MT)		11,486.44	12,635.20		
Certified Areas (Ha)		12,002.52	12,002.52		
Planted Areas (Ha)		11,282.65	11,274.85		
Production Areas (Ha)		9,594.84	9,545.44		
HCV Areas		3.26	3.26		
REMARKS		-	Changes at planted area due to convert to road/drain.		

TABLE 2

	PO	PK
Last years certified volume (MT)	45,417.42	11,486.44
Last years actual certified sold (MT)	41,213.63	11,486.44
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	4,203.79	0.00
New year certified volume (MT)	48,243.48	12,635.20

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1.0 AUDIT PROCESS

1.1 Certification Body

SIRIM QAS International Sdn. Bhd. is the leading certification, inspection and testing body in Malaysia. SIRIM QAS International provides a comprehensive range of certification, inspection and testing services which are carried out in accordance with internationally and nationally recognised standards. Attestation of this fact is the accreditation of the various certification and testing services by leading national and international accreditation and recognition bodies such as the Department of Standards Malaysia (STANDARDS MALAYSIA), the United Kingdom Accreditation Services (UKAS) and the International Automotive Task Force (IATF). SIRIM QAS International is a partner of IQNet, a network currently comprising of leading certification bodies in Europe, North and South America, East Asia and Australia.

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and accredited by ASI on 27 September 2014.

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd. Zulfakar Kamaruzaman	Auditor Team Leader / Supply Chain, Social and HCV	Holds a B.Sc. Forestry. He had several years of working experience in the oil palm operation. He is a qualified RSPO P&C and RSPO Supply Chain Lead Auditor.
Rozaimee Ab. Rahman	Auditor / Environment and occupational health and safety (Estate)	Holds a B. Sc. Of Agriculture. He had several years of working experience in the oil palm operation. He is a qualified auditor for RSPO P&C.
Selvasingam T. Kandiah	Auditor Good Agricultural Practices	Holds a B. Sc. (Hons) in Agriculture. He had worked as a planter with Kumpulan Guthrie Berhad before retiring including in Liberia. He is a qualified auditor for RSPO P&C & MSPO.
Amir Bahari	Auditor / Environment and occupational health and safety (Mill)	Holds a B. Sc. (Hons) in Agriculture, he had work with Sime Darby Plantation for more than 15 years of experience in estate operation and five years in palm oil mill. He has been qualified as a RSPO auditor for the past 2 years.

1.3 Audit methodology

The audit covered the Tennamaram Palm Oil Mill and two of its supply bases. The sampling of the number of the supply base was using the formula of $0.8\sqrt{y}$. The two supply base covered during the audit are Tennamaram and Bukit Talang Estates. The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

Stakeholder consultation was carried out during the on-site audit. In general, there was no negative comments made against this Certification Unit.

1.5 Audit plan:

Refer to Attachment 2.

1.6 Date of next audit:

The next surveillance audit will be conducted within 12 months but not sooner than 8 months from this audit.

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Tennamaram certification unit (CU) is one of the Sime Darby Plantation Sdn Bhd's (SDPB's) Strategic Operating Unit (SOU). The CU is also known as SOU 6 and was certified to the RSPO P&C by SIRIM QAS International Sdn Bhd in 2015. In 2016, the CU was certified with one mill and 4 estates. For 2017, the number of unit of supply base of SOU 6 had been reduced to 3, i.e. Tennamaram Estate, Bukit Talang Estate and Sungai Buloh Estate. Previously Elmina Estate had been amalgamated into Tennamaram Estate, which now known as Elmina Division (i.e. as a new sub-unit of Tennamaram Estate).

The palm oil mill maintained its capacity of 60 mt FFB / hour. All the estates within the CU have been fully developed before the year of 2005. Hence, Principle 7 of the RSPO P&C is therefore not applicable.

2.2 Description of the Supply Base (including the planting profile)

The FFB is sourced from company owned estates that were certified. Noted that there were some diversions of FFB from HSPHB's estates certified under different CU.

Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

Table 1: Actual FFB production by the supply base for the last reporting period (Dec 2016- Nov 2017)

Estates	FFB Prod	Certifying CB	
Estates	Tonnes	Percentage (%)	Certifying CB
Tennamaram (inclusive of Elmina)	70,136.00	27.17	SIRIM
Bukit Talang	72,553.96	28.11	SIRIM
Sungai Buloh	110,398.85	42.77	SIRIM
Bukit. Kerayong	5,012.03	1.95	BSI
Total	258,100.84	100.00	

<u>Table 2: Projected FFB production by the supply base for the next reporting period</u>
(<u>Dec 2017- Nov 2018)</u>

Estates	FFB Production			
Estates	Tonnes	Percentage (%)		
Tennamaram (inclusive of Elmina)	57,664.28	25.10		
Bukit Talang	66,811.83	29.08		
Sungai Buloh	105,254.74	45.82		
Total	229,730.85	100.00		

Table 3: Actual FFB received and CPO & PK dispatch by the Tennamaram POM for the last reporting period (Dec 2016- Nov 2017)

	Total (MT)
FFB Received	258,100.84
FFB Processed	257,231.93
Certified FFB	257,231.93
Non Certified FFB	0.00
CPO Production	51,160.84
PK Production	14,147.76
CPO delivered as Identity Preserved	41,213.63
CPO delivered as non-RSPO certified	4,203.79
PK delivered as Identity Preserved	11,486.44
PK delivered as non-RSPO certified	0.00

<u>Table 4: Projected FFB received and CPO & PK dispatch by the Tennamaram POM of the next reporting period</u>
(Dec 2017- Nov 2018)

	Total (MT)
FFB Received	229,730.85
FFB Processed	229,730.85
Certified FFB	229,730.85
Non Certified FFB	0.00
CPO Production	48,243.48
PK Production	12,635.20
CPO delivered as Identity Preserved	48,243.48
CPO delivered as non-RSPO certified	0.00
PK delivered as Identity Preserved	12,635.20
PK delivered as non-RSPO certified	0.00

Table 5: Planted and certified area of the SOU Tennamaram

Estate	Planted (ha)	Certified (ha)
Tennamaram (inclusive of Elmina)	2,917.66	3,213.33
Sungei Buloh	4,823.22	5,154.08
Bukit Talang	3,533.97	3,635.11
Total	11,274.85	12,002.52

Table 6: Planting profile for SOU Tennamaram

<u>Estate</u>	<u>Year</u>	Planting	Mature	<u>Immature</u>	Planted	<u>% of</u>	<u>% of</u>
	<u>established</u>	<u>Cycle</u>	<u>(Ha)</u>	<u>(Ha)</u>	<u>area</u>	planted	<u>planted</u>
						<u>area</u>	<u>area</u>
						<u>mature</u>	<u>immature</u>
Tennamaram	1917	4	2,477.36	440.30	2,917.66	83.88	16.12
Sungei Buloh	1952	3	4,139.11	684.11	4,823.22	85.82	14.18
Bukit Talang	1936	3	2,928.97	605.49	3,533.97	82.88	17.12
Total			9,545.44	1,729.41	11,274.85	84.66	15.34

Table 7 (a): Planting profile for Tennamaram Estate

Year of planting	Planting Cycle (1st, 2nd, 3rd etc Generation)	Mature/Immature (Ha)	Planted area (ha)	Percentage of planted area
2002	1st	Mature	22.88	0.78
2002	2nd	Mature	35.91	1.23
2003	2nd	Mature	71.09	2.44
2004	2nd	Mature	53.58	1.84
2006	2nd	Mature	180.97	6.20
2007	2nd	Mature	67.34	2.31
2008	1st	Mature	118.41	4.06
2008	2nd	Mature	88.37	3.03
2009	1st	Mature	119.52	4.10
2009	2nd	Mature	54.22	1.86
2010	1st	Mature	99.00	3.39
2010	2nd	Mature	220.8	7.57
2011	2nd	Mature	104.27	3.57
1986	1st	Mature	49.1	1.68
1987	1st	Mature	70.85	2.43
1988	1st	Mature	85.14	2.92
1989	1st	Mature	78.29	2.68
1990	1st	Mature	65.57	2.25
1990	3rd	Mature	67.11	2.30
1991	3rd	Mature	119.72	4.10
1992	3rd	Mature	113.66	3.89
1993	3rd	Mature	10.24	0.35
1994	1st	Mature	80.25	2.75
1995	1st	Mature	73.39	2.51
1996	3rd	Mature	87.24	2.99
1997	3rd	Mature	83.96	2.88
1999	3rd	Mature	107.41	3.68
2012	1st	Mature	112.6	3.86
2013	4th	Mature	36.47	1.25
2013	4th	Immature	63.58	2.18
2014	4th	Immature	119.12	4.08
2017	4th	Immature	94.97	3.25
2018	4th	Immature	162.63	5.57
TOTAL			2917.66	100.00

Table 7 (b): Planting profile for Sungei Buloh Estate

Year of Planting	Planting Cycle	Maturity status	Planted Area (Ha)	%
1992	2nd	Mature	224.70	4.67
1993	2nd	Mature	525.51	10.88
1994	Rubber to Oil Palm	Mature	67.50	1.40
1995	2nd	Mature	207.80	4.31
1996	2nd	Mature	196.50	4.07
1997	2nd	Mature	294.00	6.1
1998	2nd	Mature	329.00	6.82
2000	2nd	Mature	68.50	1.42
2001	2nd	Mature	129.10	2.68
2002	2nd	Mature	254.40	5.27
2003	2nd	Mature	84.70	1.76
2004	2nd	Mature	74.90	1.55
2006	2nd	Mature	127.90	2.65
2007	3rd	Mature	173.30	3.59
2008	3rd	Mature	200.50	4.15
2009	3rd	Mature	154.00	3.2
2010	3rd	Mature	330.40	6.85
2011	3rd	Mature	77.50	1.61
2013	3rd	Mature	401.00	8.31
2014	3rd	Mature	217.90	4.52
2015	3rd	Immature	296.27	6.15
2016	3rd	Immature	182.01	3.78
2017	3rd	Immature	205.83	4.27
Total			4,823.22	100.00

Table 7 (c): Planting profile for Bukit Talang Estate

Year of Planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature/Immature	Planted Area (Ha)	Percentage of Planted (Ha)
1991	3rd	Mature	14.61	0.41
1992	3rd	Mature	36.93	1.05
1993	3rd	Mature	156.83	4.44
1994	3rd	Mature	65.99	1.87
1995	3rd	Mature	100.36	2.84
1996	3rd	Mature	150.08	4.25
1997	3rd	Mature	210.93	5.97
1998	3rd	Mature	260.58	7.37
1999	3rd	Mature	182.67	5.17
2000	3rd	Mature	221.96	6.28
2001	3rd	Mature	400.56	11.33
2002	3rd	Mature	201.94	5.71
2003	3rd	Mature	283.39	8.02
2004	3rd	Mature	47.74	1.35
2007	3rd	Mature	93.29	2.64
2008	3rd	Mature	49.26	1.39
2009	3rd	Mature	42.68	1.21
2011	3rd	Mature	47.38	1.34
2012	3rd	Mature	309.19	8.75
2013	3rd	Mature	52.11	1.47
2014	3 rd	Immature	46.63	1.32
2016	3 rd	Immature	347.02	9.82
2017	3 rd	Immature	211.84	5.99
	Total		3533.97	100.00

2.3 Organizational Information/Contact Person

The details of the contact person is as shown below:

Name	:	Mr. Zalizan Mohd Tahir
Position	:	Mill Manager
Address	:	45600 Bestari Jaya
		Selangor Darul Ehsan
Phone no.	:	+603-32719701
Fax no.	:	+603-2719062
Email	:	kks.tennamaram@simedarby.com

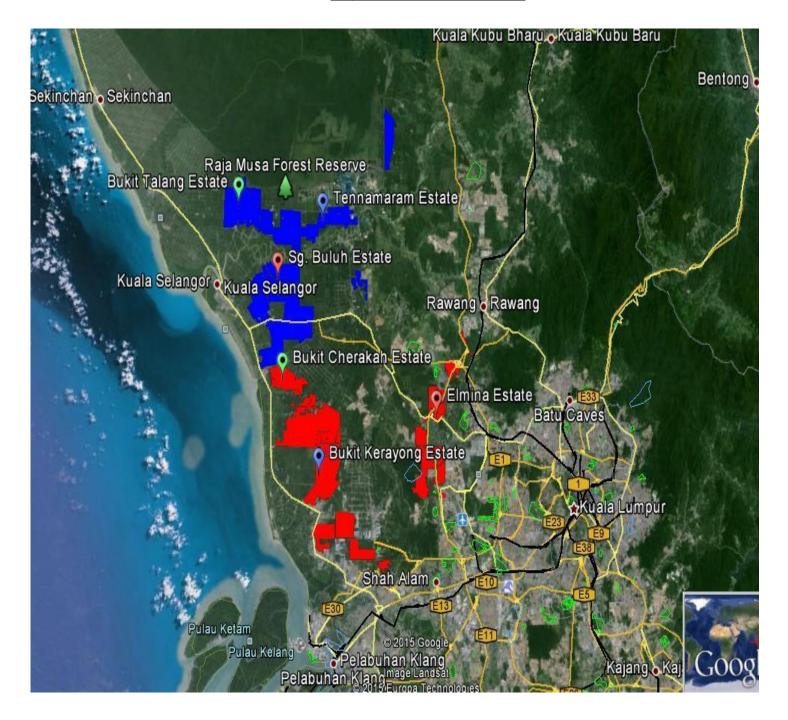
3.0	AUDIT FINDINGS					
3.1	Changes to certified products in accordance to the production of the previous year					
	There was no change to the certified products since last assessment.					
3.2	Progress and changes in time bound plan (Refer to Attachment 7 for the time bound plan)					
i.	Have all the estates under the parent company been certified?					
	If no, comments on the organization's compliance with the RSPO partial certification rules:					
	Internal Audit dated in 18 Dec 2017 was conducted based on RSPO Partial Certification Requirements. No significant non-compliance was observed by the organization. It has been noted that SDP was progressively undergoing the RSPO Certification process towards 100% RSPO certification of their estates/mills. PT MAS (Indonesia) has undergone the RSPO Main assessment and was delayed due to some social disputes. The certification of this CU was subject to the progress of the matter being resolved. With regards to the engagement with the RSPO, it was evident that the RSPO Secretariat was well informed on the progress through regular briefing and progress reports. The latest meeting with RSPO Secretariat was held on 8 Sept 2016. To-date, 9 progress reports were submitted to RSPO and the latest was dated on 30 June 2016. Further information can be obtained from http://www.rspo.org/members/complaints/status-of-complaints/view/29					
ii.	Are there any changes to the organization's time bound plan? $\sqrt{}$ Yes $\sqrt{}$ No					
	If yes, comment in terms of acceptance or non-acceptance on the changes in the time-bound plan?					
	N/A					
iii.	Are there associated smallholders (including scheme Yes √ No					
	If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification?					
	If no, please state reasons Not applicable. There is no associated smallholders supplying FFB to the CU.					
iv.	Any new acquisition which has replaced primary forests or HCV areas Yes $\begin{tabular}{ c c c c c c c c c c c c c c c c c c c$					
	N/A					
3.3	Other changes (e.g. organizational structure, new contact person, addresses, etc.) Sime Darby Plantation Sdn Bhd has been changed to Sime Darby Plantation Berhad.					

3.4	Status of previous non-conformities * \tau \text{Closed} \text{Not closed*} \\ * If not closed, minor non conformity will be upgraded to major non conformity					
3.5.	Complaint received from stakeholder (if any)					
	No complaints from stakeholders were o	bserved.				
•						
4.0	DETAILS OF NON-CONFORMITY REPO	ORT				
4.1	For P&C (Details checklist refer to Attachment 3) :					
	Total no. of minor NCR(s) (details refer to Attachment 4)	List: 1	STK 01 2017			
	Total no. of major NCR(s) (details refer to Attachment 4)	List: 5	RAR 01 2017, RAR 02 2017, STK 02 2017, STK 03 2017, RAR 03 2017			
4.2	For SC (Details checklist refer to Attachn	nent 5) :				
	Total no. of minor NCR(s) (details refer to Attachment 5)	List : -	N/A			
	Total no. of major NCR(s) (details refer to Attachment 5)	List: 1	MZK 01 2017			
5.0	AUDIT CONCLUSION					
	The audit team concludes that the organization has established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.					

6.0 REC	6.0 RECOMMENDATION						
	No NCR recorded. Recommended to continue certification.						
		Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.					
		or NCRs raised in the audit which are not led to major NCRs .	addressed in the subsequ	ent audit shall			
		R(s) recorded. Evidence of implementations and accepted by the audit team. The NCF					
	Recomme	nded to continue certification.					
	Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s) which have not been satisfactorily closed out within 90 days of the audit. Recommended for suspension of the certificate.						
		ior NCRs which are not addressed with being withdrawn.	in a further 90 days shal	I result in the			
7.0 IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED. RECOMMENDED FOR CONTINUATION OF RSPO P & C CERTIFICATION.							
Audit Team I	Leader :	MOHD ZULFAKAR KAMARUZAMAN		8/2/2018			
		(Name)	(Signature)	(Date)			

Attachment 1

Map of SOU 6 Tennamaram



Attachment 2

RSPO SURVEILLANCE AUDIT PLAN

1. Objectives

The objectives of the assessment are as follows:

- (i) To evaluate **SOU 6 Tennamaram** continued conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI) and RSPO Supply Chain Requirements
- (ii) To verify the effective implementation of corrective actions arising from the findings of last assessment.
- (iii) To make appropriate recommendations based on the assessment findings.

2. Date of assessment : 4-8 December 2017

3. Site of assessment : SOU Tennamaram

Tennamaram Palm Oil Mill

- Tennamaram Estate
- Bukit Talang Estate

4. Reference Standard:

- a. RSPO P&C MYNI:2014
- b. RSPO Certification Systems June 2007
- c. RSPO Supply Chain Standard, November 2014
- d. Company's audit criteria including Company's Manual/Procedures

5. Assessment Team

Assessor: Mohd Zulfakar Kamaruzaman

Rozaimee Bin Ab Rahman

Amir Bahari

Selvasingam T Kandiah

If there is any objection to the proposed audit team, the organization is required to inform the Lead Auditor/RSPO Section Manager.

7. Audit Method

Site audits including observation of practices, interviews with interested parties (all categories of contractors, employees, nearby population, etc.), documentation evaluation and evaluation of records.

8. Audit Findings

Audit findings shall be classified as major and/or minor. Major non conformities shall be addressed within 90 days or else the certificate shall be suspended. If the major non conformities are still not addressed within another 90 days, the certificate shall be terminated.

If there are five or more major non-compliances within one Principle found during the audit, immediate suspension of RSPO certification shall be recommended.

For minor non conformities raised in the surveillance audit, corrective action shall be verified in the next audit. These shall be upgraded to major non conformities if the corrective actions are not satisfactory implemented in the next audit.

9. Confidentiality Requirements

SIRIM QAS International shall not disclose any information concerning the company regarding all matters arising or coming to its attention with the conduct of the programme, which is of confidential in nature other than information, which is in the public domain.

In the event that there be any legal requirements for disclosing any information concerning the organization, SIRIM QAS International shall inform the organization of the information to be disclosed.

10. Working Language : English and Bahasa Malaysia

11. Reporting

a) Language : English

b) Format : Verbal and written

c) Expected date of issue : 2 weeks after the closure of the Major NC / or if only minor NC,

30 days from the last day of this audit

12. Facilities Required

a. Room for discussion

b. Relevant document and record

c. Personnel protective equipment if required

d. Photocopy facilitiese. A guide for each group

13. Assessment Programme Details : As below

Time		, and the second se	Activities / areas to be visited		
8.30 – 9.00 am	Opening meeting at Tennamaram Palm Oil Mill Lead Auditor to introduce audit team member, brief on audit objectives, scope, methodology, criteria and programmes Organization Representative to brief on the following: 1) RSPO implementation at Tennamaram SOU (i.e. mill & supply base) including changes 2) Time bound plan for Sime Darby 3) Significant changes on organization activities, machinery, supply bases capacity etc.				
	Zulfakar (HCV, Social and Supply Chain)	Amir (Safety and Environment) Estate	Rozaimee (Safety and Environment) Mill	Selvasingam (GAP)	
9.00 – 1.00 pm	Tennamaram POM Site visit and assessment on Supply Chain Implementation including the Model used: General Chain of Custody System Requirements for the supply chain Documented procedures Purchasing and goods in Outsourcing activity Sales and goods out Processing Records keeping Registration Training Claims	Tennamaram Estate Coverage of assessment: P1, P4, P5, P7, P8 OSH management – witness activities at site Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programmes Laws and regulations Environmental management – witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Training and skill development programmes Continuous improvement Facilities at workplace Continuous improvement	Tennamaram POM Coverage of assessment: P1, P4, P5, P7, P8 OSH management – witness activities at site Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programmes Laws and regulations Environmental management – witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Training and skill development programmes Continuous improvement Facilities at workplace Continuous improvement	Bukit Talang Estate Coverage of assessment: P1, P2, P3, P4, P7, P8 Laws and regulations Commitment to longterm economic and financial viability Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) EFB mulching, POME application Chemical store/fertilizer Plantation on hilly/swampy area IPM implementation, training and safe use of agro-chemicals. OSH management – witness activities at site Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programmes Continuous improvement	Guide(s) for each assessor
1.00 – 2.00 pm			Break		
∠.uu prn		Continue	e assessment		
2.00 – 5.00 pm					Guide(s) for each assesso

Activities /areas to be visited	Zulfakar (HCV, Social and Supply Chain)	Amir (Safety and Environment) Estate	Rozaimee (Safety and Environment) Mill	Selvasingam (GAP)	
8.30 – 1.00 pm	Tennamaram POM Coverage of assessment: P1, P2, P4, P5, P7, P8 Laws and regulations Social Impact Assessment (SIA), management plan & implementation Complaints and grievances Consultation with relevant government agencies Interview workers, Contractors, gender committee, local communities and stakeholders Check payslip, Contract Agreement Check Sundry Shop Land titles user rights Inspection of protected sites with HCV attributes Forested area, plantation boundary, Neighbouring land use. Riparian Zone Continuous improvement	Tennamaram Estate Coverage of assessment: P1, P4, P5, P7, P8 OSH management – witness activities at site Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programmes Laws and regulations Environmental management – witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Training and skill development programmes Continuous improvement Facilities at workplace Continuous improvement	Tennamaram POM Coverage of assessment: P1, P4, P5, P7, P8 OSH management – witness activities at site Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programmes Laws and regulations Environmental management – witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Training and skill development programmes Continuous improvement Facilities at workplace Continuous improvement	Bukit Talang Estate Coverage of assessment: P1, P2, P3, P4, P7, P8 Laws and regulations Commitment to longterm economic and financial viability Good Agricultural Practicewitness activities at site (weeding/ spraying, etc) EFB mulching, POME application Chemical store/fertilizer Plantation on hilly/swampy area IPM implementation, training and safe use of agrochemicals. Continuous improvement	Guide(s) for each assessor
1.00 – 2.00 pm			Break		
2.00 – 5.00 pm		Continue	assessment		Guide(s) for each assessor

Activities /areas to be visited	Zulfakar (HCV, Social and Supply Chain)	Amir (Safety and Environment) Estate	Rozaimee (Safety and Environment) Mill	Selvasingam (GAP)	
8.30 – 1.00 pm	Tennamaram Estate Coverage of assessment: P1, P2, P4, P5, P7, P8 Laws and regulations Social Impact Assessment (SIA), management plan & implementation Complaints and grievances Consultation with relevant government agencies Interview workers, Contractors, gender committee, local communities and stakeholders Check payslip, Contract Agreement Check Sundry Shop Land titles user rights Inspection of protected sites with HCV attributes Forested area, plantation boundary, Neighbouring land use. Riparian Zone Continuous improvement	Bukit Talang Estate Coverage of assessment: P1, P4, P5, P7, P8 OSH management – witness activities at site Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programmes Laws and regulations Environmental management – witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Training and skill development programmes Continuous improvement Facilities at workplace Continuous improvement	Bukit Talang Estate Coverage of assessment: P1, P4, P5, P7, P8 OSH management – witness activities at site Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programmes Laws and regulations Environmental management – witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Training and skill development programmes Continuous improvement Facilities at workplace Continuous improvement	Tennamaram Estate Coverage of assessment: P1, P2, P3, P4, P7, P8 Laws and regulations Commitment to longterm economic and financial viability Good Agricultural Practice-witness activities at site (weeding/ spraying, etc) EFB mulching, POME application Chemical store/fertilizer Plantation on hilly/swampy area IPM implementation, training and safe use of agro-chemicals. OSH management – witness activities at site Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programmes Continuous improvement	Guide(s) for each assessor
1.00 – 2.00 pm			Break		
2.00 – 5.00 pm		Continue a	ssessment		Guide(s) for each assessor

Activities /areas to be visited	Zulfakar (HCV, Social and Supply Chain)	Amir (Safety and Environment) Estate	Rozaimee (Safety and Environment) Mill	Selvasingam (GAP)	
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1.00 –			Break		
2.00 pm		Otime			<u> </u>
2.00 – 5.00 pm		Continue a	ssessment		Guide(s) for each assessor

Activities /areas to be visited	Zulfakar (HCV, Social and Supply Chain)	Amir (Safety and Environment) Estate	Rozaimee (Safety and Environment) Mill	Selvasingam (GAP)			
8.30 – 1.00 pm	Bukit Talang Estate Coverage of assessment: P1, P2, P4, P5, P7, P8 Laws and regulations Social Impact Assessment (SIA), management plan & implementation Complaints and grievances Consultation with relevant government agencies Interview workers, Contractors, gender committee, local communities and stakeholders Check payslip, Contract Agreement Check Sundry Shop Land titles user rights Inspection of protected sites with HCV attributes Forested area, plantation boundary, Neighbouring land use. Riparian Zone Continuous improvement	Tennamaram POM Coverage of assessment: P1, P4, P5, P7, P8 OSH management – witness activities at site Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programmes Laws and regulations Environmental management – witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Training and skill development programmes Continuous improvement Facilities at workplace Continuous improvement	Tennamaram Estate Coverage of assessment: P1, P4, P5, P7, P8 OSH management – witness activities at site Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programmes Laws and regulations Environmental management – witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Training and skill development programmes Continuous improvement Facilities at workplace	Bukit Talang Estate Coverage of assessment: P1, P2, P3, P4, P7, P8 Laws and regulations Commitment to longterm economic and financial viability Good Agricultural Practicewitness activities at site (weeding/ spraying, etc) EFB mulching, POME application Chemical store/fertilizer Plantation on hilly/swampy area area use of agro-chemicals. OSH management – witness activities at site Coccupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programmes Continuous improvement	on d		
1.00 – 2.00 pm			Break				
2.00 – 4.00 pm	 Continue assessment on unfinished area Verification on outstanding issues Audit Team discussion, preparation on audit findings and issuance of NCR (if any) 						
4.00 – 5.00 pm	Audit Team discussion, preparation on audit findings and issuance of NCR (if any) Closing meeting						

Attachment 3

RSPO P&C AUDIT CHECKLIST AND FINDINGS

Principle 1: COMMITMENT TO TRANSPARENCY

Clause	Indicator	s	Comply Yes/No	Findings
C 1.1 Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms	1.1.1	There shall be evidence that growers and millers provide adequate information upon request for information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.	YES	SOU Tennamaram continued to implement the communication procedure and maintain records on requests for information. The procedure for responding to any communication is as outlined in subsection 5.5 of appendix 5.5.3.2 of Standard Operation Manual of Estate Quality Management System documents. The communication flow charts were available on the notice boards in the Estate and Mill offices and Muster Grounds. Both Estates and Mill continued to maintain the stakeholders list which included the contractors, vendors/suppliers, government agencies, schools, local communities, etc. SDPB continued to use the internet to disseminate public information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances. The SDPB website address is http://plantation.simedarby.com .
to allow for effective participation in decision making.	1.1.2	Records of requests for information and responses shall be maintained. Major Compliance	YES	SOU Tennamaram had identified personnel responsible for handling of complaints. Records of communication were identified and maintained in different files, internal & external communication, depending on the stakeholder. Among the records inspected were correspondences with the authorities, local communities and employees. All records relating to communication with the authorities have been appropriately identified and maintained.
C 1.2 Management	1.2.1	Land titles/user rights	YES	Evidence of legal ownership of the land including history of land tenure was verified during this audit. This document was made available by all the Mill and individual estates.
documents are publicly available, except where this is prevented by		Occupational health and safety plans	YES	Both the estates and the mill in Tennamaram SOU have established the Safety and Health plan. The SDPB OHS Policy is also available at all the operating units. The policy is available in both Bahasa Malaysia and English. The policy has been communicated to all level of employees through briefings/training coupled with display at all offices and prominent notice boards within the complex.
commercial confidentiality or where disclosure of		Plans and impact assessments relating to environmental and social impacts	YES	Social and environmental impact assessments and its relevant plans continued made available.
information would result in negative environmental or social outcomes.		HCV documentation summary	YES	HCV documentation summary and HCV Assessment was publicly available at the estates and mill offices.
		Pollution prevention and reduction plans	YES	The CU continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records contained identification and evaluation of environmental impact of activities and processes related to the estate and mill operation. The Environmental Management Plan 2017 / 2018 has been established and reviewed in July 2017. The plan also includes elements of Pollution Prevention Plan. The status of the action taken were being monitored.
		Details of complaints and grievances	YES	The details of complaints and grievances can be accessed by the public/stakeholders at estates and mill offices.

		Negotiation procedures	YES	Negotiation procedures for the SOU Tennamaram is available. This document reviewed by the audit team during the audit.
		Continual improvement plans (Criterion 8.1);	YES	Sime Darby Plantation Bhd. has committed to utilise the established system to regularly monitor and review their key activities at the mill and estates. Relevant action plans were initiated for continuous improvement in key areas of operations, environmental, safety, health and welfare of the workers as well as social contribution to the community. Details of the CU continual improvement plans have been reported in indicator 8.1. The continuous improvement plans related to environment was established and update accordingly.
				Continual improvement plans were made available at all operating units. Among the relevant documents reviewed were: (a) Pollution Prevention Plan – FY2017/18 (b) Identification and Management of Wastewater – FY2017/18. (c) Waste Management Plan – FY2017/18 (d) Environmental Improvement Plan – FY2017/18. (e) Yield Enhancement Plan – FY2017/18. (f) Chemical Reduction Plan – FY2017/18. (g) IPM Plan – FY2017/18 (h) Water management Plan – FY2017/18.
				The SOU Tennamaram follows the Sime Darby Plantation Sdn Bhd's Lean Six Sigma and Continuous Improvement (LSS & CI) approach. In addition, each Mill and Estate has its own Social Impact Assessment Action Plan which is used
				as the basis for responding and improving issues brought by the respective stakeholders.
		Public summary of certification assessment report;	YES	Public summary is available in website: http://www.sirim-qas.com.my.
		Human Rights Policy (Criterion 6.13).	YES	Human Rights policy for the CU is in the Sime Darby Plantations Sdn Bhd's Social & Humanity Policy dated January 2015. The policy among others state that business is carried out with a sense of humanity, ensuring they are socially beneficial and do not infringe on basic human rights. This policy is available at the respective notice boards of the mill and estates.
C 1.3 Growers and millers commit to ethical conduct in all business operations and transactions.	1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. Minor Compliance	YES	The SOU 6 Tennamaram is following the Sime Darby Plantations Sdn Bhd's Code of Business Conduct. It contains, among others, the following aspects of business conduct: - Equal opportunity and non-discriminaiton - Criminal activities - Harassment ad violence - Avoiding conflicts of interests - Guarding against bribery and corruption - Anti-money laundering and anti-terrorism financing - How to report a violation

Principle 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

Clause	Indicator	s	Comply Yes/No	Findings
C 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1	Evidence of compliance with relevant legal requirements shall be available. Major Compliance	NO	SOU 6 Tennamaram maintains its compliance with relevant legal requirements. Among evident of compliance observed were wages and deductions continued to meet legal requirement and Collective Agreement, EPF and SOCSO monthly contribution, "Borang A" and "Borang 8A" of monthly contribution for EPF and SOCSO, valid work permit, passport and compensation insurance policies and amenities provided meet legal requirements. These regulations were reviewed accordingly; Factory and Machinery Act 1967, EQ (Prescribed Premise) Crude Palm Oil Regulations 1977, EQ (Scheduled Waste) Regulations 2005, OSHA 1994, Use and Standards Of Exposure of Chemicals Hazardous to Health Regulations 2000 and Electricity Supply Act 2015. Nevertheless, it was noted that: 1) Bukit Talang Estate's medical surveillance follow up as recommended in 2016 was not conducted, 2) Tennamaram POM's monthly report to DOE regarding disposal schedule of EFB and location of EFB dumping area was not available as per "Jadual Pematuhan". Major NCR STK 02 2017 was issued to address both non-conformances.
	2.1.2	A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance	YES	The CU had identified, documented and maintained their legal register with written information on legal requirements which related to their operation in legal register entitled Legal Requirement Register. The PSQM Department is responsible to track changes and the information was disseminated to all its estates and mills.
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	YES	The CU had a documented system for identifying and updating the changes of legal requirements and to monitor the status of legal compliance. This was as documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual. PSQM Department and respective operating units have undertaken the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance. The compliance to legal requirements was evaluated on an annual basis. These were carried out via Internal & External Audits, PA and MA visits, RSPO Audits and periodic reporting from operating units to headquarters.
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	YES	The PSQM Department of HQ is responsible to track changes and the information was disseminated to all its estates and mills This mechanism was outlined in its internal procedure.

C 2.2 The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary	2.2.1	Documents showing legal ownership or lease, history of land tenure (confirmation from community leaders based on history of customary land tenure, recognised NCR land) and the actual legal use of the land shall be available. Major Compliance	YES	Copies of legal ownership of the estate land were available. The audit team had verified the land title for Tennamaram Estate and Bukit Talang Estate. All original titles are kept by SDPB headquarters and the estates only maintained the copies. There was no NCR land in both Estates and Land use was as per the titles.
or user rights	2.2.2	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and reserves. Minor Compliance	YES	Auditor has verified the boundary stone and pegs at Tennamaram and Bukit Talang Estate. The boundary pegs were visible along the boundary adjacent to another plantation area.
	2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with FPIC. Minor Compliance	YES	There was no land encumbered by customary rights or dispute from any stakeholder at Tennamaram CU.
	2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes are implemented and accepted by the parties involved. Major Compliance	YES	During this surveillance audit, there was no land conflict observed.
	2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties. Minor Compliance	YES	During this surveillance audit, there was no land conflict observed.
	2.2.6	To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations. Major Compliance	YES	The CU observed to maintain peace. No case of instigated violence and land conflict, as affirmed with interviewed of local communities and employees.

C 2.3 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights shall be developed through participatory mapping involving affected parties. Major Compliance	YES	Not applicable for Tennamaram CU since there was no land encumbered by customary rights or disputed from any stakeholder.
and informed consent.	2.3.2	Copies of negotiated agreements detailing the process of FPIC shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. Minor Compliance	YES	Not applicable for Tennamaram CU since there was no land encumbered by customary rights or disputed from any stakeholder.
	2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. Minor Compliance	YES	Not applicable for Tennamaram CU since there was no land encumbered by customary rights or disputed from any stakeholder.

2.3.4	Evidence shall be available to	YES	Not applicable for Tennamaram CU since there was no land encumbered by customary rights or
	show that communities are		disputed from any stakeholder.
	represented through institutions		
	or representatives of their own		
	choosing, including legal		
	counsel. Major Compliance		

Principle 3: COMMITMENT TO LONG-TERM ECONOMIC AND FINANCIAL VIABILITY

Clause	Indicator	s	Comply Yes/No	Findings
C 3.1 There is an implemented management plan that aims to achieve long-term economic and	3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. Major Compliance	YES	The CU continued to make commitment to long-term economic and financial viability. The annual budgets for 2017/18 to 2021/2022 which included Capital and Operating Expenditures in addition to FFB yield/Ha, OER and CPO were sighted. The budget provisions cover activities for machinery and plant upkeep, expenditure for mature and immature oil palm upkeep, harvesting and evacuation, welfare, capital expenditure, RSPO compliance etc. Elmina Division has a separate budget and projection.
financial viability.	3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, shall be available. Minor Compliance	YES	The long-range replanting programme (LRRP) until 2030/2031 were sighted for both Estates. This programme is reviewed once a year and is incorporated in the CU annual financial budget.

Principle 4: USE OF APPROPRIATE BEST PRACTICES BY GROWERS AND MILLERS

Clause	Indicators		Comply Yes/No	Findings
C 4.1 Operating procedures are appropriately documented, consistently implemented and monitored	4.1.1	Standard Operating Procedures for estates and mills shall be documented. Major Compliance	NO	The CU continued to use documents established by the Sime Darby Plantation Sdn Bhd. Among the documents were Plantations / Mill Quality Management System (PQMS / MQMS). Manual, PQMS / MQMS Standard Operating Manual and Procedures (SOP) and Sustainable Plantation Management System (SPMS) Manual, RSPO Supply Chain Manual, ESH Management System Manual, Occupational Safety and Health Manual, Pictorial Safety Standards, Laboratory Process Control Manual and Security Guidelines. Besides that, technical guidelines as listed in the Agricultural Reference Manual were also used. However, though both Bukit Talang and Tennamaram Estates had peat soils, there was no policy/procedure established to monitor/measure subsidence of peat soils for which the Major NCR STK 03 2017 was raised.
	4.1.2	A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	NO	Tennamaram CU continued to implement the mechanism to ensure consistent implementation of activities / operation as per SOPs. The practice of reusing all water from washing of agrochemical containers, PPE and spraying equipment, spillage during chemical mixing and emergency showers was now observed to be reused. However, during this visit the following was observed to be noncompliant:

				The Standard operating procedure of 'Pemandu Kenderaan' of Tennamaram Estate was not implemented. Hydraulic Oil from one of the tractors carrying out P&D spraying was found leaking. Thus the NCR STK 01 2017 was issued.
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	YES	Records of monitoring and the actions taken by the CU continued to be maintained. This is to ensure that the established procedures were consistently implemented.
	4.1.4	The mill shall record the origins of all third-party sourced FFB. Major Compliance	YES	Fresh Fruit Bunches are supplied from SDPB owned estates which are certified to RSPO. There is no third-party FFB sent to the mil, therefore this indicator is not applicable.
C 4.2 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.	4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance	YES	Both Bukit Talang and Tennamaram Estates practiced the maintenance of long-term soil fertility by annual application of fertilizers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and some EFB and compost application, POME application (only in Tennamaram Estate), water management and by maintaining soft weeds within interlines. The SOP for manuring was in Section 8 of the Agricultural Reference Manual and Section 14 of the EQMS. Fertilizer application, which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by the agronomist from Sime Darby Research Sdn. Bhd. Annual fertilizer recommendations were made based on annual foliar sampling and 5 yearly soil sampling. Fertilizer application program was monitored using the program sheets, bin cards, field cost book, etc.
	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	YES	Fertilizer application program was monitored using the program sheets, bin cards, field cost book, etc. Records of programs and applications of fertilizers were made available to auditors.
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	YES	From the Agronomist reports it was confirmed that both estates carried out periodic foliar and soil sampling to monitor changes in nutrient status. Annual foliar sampling for the nutrients N, P, K, Mg,Ca & B had been carried out and the results formed the basis for the fertilizer recommendations to maintain and to improve soil fertility. The latest foliar sampling was conducted in April 2017 on Bukit Talang Estate and in August 2017 on Tennamaram Estate. Soil maps were made available and reviewed by the auditors. The sampling on Bukit Talang Estate was done on 29/09/2017 and on Tennamaram Estate was carried out on 19/09/2014.
	4.2.4	A nutrient recycling strategy shall be in place, and may include use of EFB, POME, and palm residues. Minor Compliance	YES	Both estates had a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose and by EFB application. For EFB application on both estates, priority was given for application in young mature areas and replants. No compost was applied in both estates. Currently POME application was on going.
C 4.3 Practices minimize and control erosion and degradation of soils.	4.3.1	Maps of any fragile/marginal soils shall be available. Major Compliance	YES	Soil maps were available on both Bukit Talang and Tennamaram Estate. Based on the soil maps, 9.79% of the soils series in Bukit Talang Estate was of Peat soil and 2.62% was of Peat and Much soil while 6% of Tennamaram Estate was of peat soils. The management continues to carry out its best practice in maintaining the water table of these areas according to its establish procedure and program and water levels were managed at optimum levels using sand bags.
	4.3.2	A management strategy shall be in place for plantings on slopes between 9 and 25 degrees unless specified otherwise by the company's SOP.	YES	SDPB had a management strategy in place for planting on slopes and to minimise and control erosion and degradation of soils. The strategy in place for plantings on slopes between 9 and 25 degrees was in Slope & River Protection Policy – Buffer Zone & 25 degree slope and in item 8 Section 4 – Land Preparation for Terracing in ARM Manual. Both Estates had complied with this strategy.

		Minor Compliance		advoi const	cated through proper stacking of fi	e and control erosion and degradation of soils were also ronds, EFB application, avoidance of blanket spraying, and maintenance of soft vegetation in interlines. It was eas that slopes were terraced.
	4.3.3	A road maintenance programme shall be in place. Minor Compliance	YES	Estat its roads roads estate	e and Sungai Buloh Estate. Accessib ad maintenance programmes. The prets. Surface run off water from roads values, road sided drains and silt pits. Bot es had mid-mounted and tractor draw	ad conditions were well maintained in both Tennamaram ility were made possible by regular maintenance guided by rogram had been supported by adequate provisions in the were well directed into fields and drains with well cambered the estates had hired backhoes for road maintenance. The wn rollers and back-buckets. For resurfacing, both estates sighted at strategy points in both estates.
	4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. Major Compliance	NO	its be adeq by us estate The i	est practices in maintaining the water uate and water table was monitored a sing piezometers, water level markers es had mobile and static water pump nlet and outlet of water through these	re and programme, the management continues to carry out table of these areas. The network of drainage system was nd maintained at 60 cm from the ground surface at all times s, sand bag stop bunds and water gates. In addition, both is to pump out and pump in as and when the need arises. In a sand were controlled by water gates. However, on both tablished to monitor/measure subsidence of peat soils for r 4.1.1.
	4.3.5	Drainability assessments where necessary will be conducted prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. Minor Compliance	YES		Bukit Talang Estate drainability ass onment Centre for the 2017A replant	essment was conducted in December 2014 by Global which had peat soil.
	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance	YES		e was some Acid Sulphate soil in Buk n place.	it Talang Estate where pH reading and water management
C 4.4 Practices maintain the quality and availability	4.4.1	An implemented water management plan shall be in place. Minor Compliance		Both The v	estates had in place and implemented vater management plans details are a	water management plans. Plans for 2017/18 were sighted. as follows;
of surface and ground					Area / /Incident	Action Steps
water.				1	Water Shortage/Dry Spell	.To purchase water from SYABAS .To train staff/workers to conserve water
				2	Severe water pollution/contamination	.Water supply to be purchased from SYABAS .To perform treatment of polluted water with assistance from SYABAS
				3	Salt water intrusion	Flushing out carried out during wet season Construction of screw gate to prevent salt water inflow Carry out inspection to identify any leakage off tide gate and flap door
	4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate	YES			ct the water courses, including maintaining and restoring I natural waterways. In accordance with the Sime Darbys'

	4.4.3	riparian and other buffer zones shall be demonstrated. Major Compliance Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national regulations. Minor Compliance	YES	policy to maintain the buffer by restricting agrochemicals application and will be left undeveloped during replanting. Site visit to the effluent treatment plant and interview with PIC revealed that the treatment plant had been carried out in accordance with the established SOP. No sight of effluent over flow and flow meter reading was recorded daily. The results of the monitoring were compiled in the DOE 'Borang Penyata Suku Tahunan'. Tennamaram mill had obtained DOE approval for land application.
	4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) shall be monitored. Minor Compliance	YES	Mill water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis. The usage varies between 1.40-1.53 ltr/MT FFB processed.
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.	4.5.1	Implementation of Integrated Pest Management plans shall be monitored. Major Compliance	YES	As for all SDPB estates, both Bukit Talang Estate and Tennamaram Estate had in place documented integrated pest management (IPM) systems. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. The IPM technique for rats includes rearing barn owls (tyto alba), bagworm control includes the planting of beneficial plants such as Cassia cobanensis, Antigonan leptopus and Turnera sublata and for rhino beetles is by using pheromone trap. Both estates carried out monthly detection and observation of leaf eating pests, rat damage and diseases like Ganoderma. These detection and observations were carried by staff. When damaged/disease was observed, proper census was then carried out. Records showed no outbreak had been taken place. Rat baiting was by calendar baiting at 2 campaigns per year. Baiting was continued until bait acceptance fell below 20%.
	4.5.2	Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	YES	Demonstrated both in Sungai Bukit Talang & Tennamaram Estate.
C 4.6 Pesticides are used in ways that do not endanger health or the environment	4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. Major Compliance	YES	Written justification in Standard Operating Procedure (SOP) of all agrochemical was available in Section 15 and 16 of the Agricultural Reference Manual issue:1 version:3 dated 1/7/2011, and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. The use of selective products that are specific to the target pest, weed or disease were demonstrated in the Agricultural Reference Manual.
	4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. Major Compliance	YES	Both visited Estates had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and Ai/Ha. Pesticides are used only when justified and areas used were recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. Both estates had documented programs for spraying pesticides and for rat baiting

4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with IPM plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice. Major Compliance		As part of the IPM plans, management of both estates had established nectariferous beneficial plants nurseries for continuous planting in order to attract natural predators and thus to reduce use of insecticides.
4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in industry's Best Practice. The use of such pesticides shall be minimised and/or eliminated as part of a plan, and shall only be used in exceptional circumstances. Pesticides selected for use are those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). Minor Compliance	YES	Both estates only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register, it was noted that all pesticides used are of class III & class IV. The use of paraquat had been banned in all SDPB estates. There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions had been used. Methamidophos was used in 2015 for trunk injection to treat bagworm attack. For year 2016 SDPB was replaced usage of methamidhapos to Acephate which class III chemical. From records and interviews with workers, staff and estate assistants, found that they were trained, all precautions taken and all legal requirements met. Signboards indicated 'AWAS Dilarang Masuk', block, dates of operation, type of operation and chemical were used.
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by worker. Major Compliance	YES	Records showed that pesticides were handled, used and applied by trained persons and as per the MSDS of the pesticide. The staffs and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the MSDS/CSDS training. It was also noted that MSDS/CSDS are available at all sites during the audit. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issuance and replacement records were verified by the auditors. Workers observed carrying out circle spraying on both Estates were using all required PPE.
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide	YES	The chemical stores in both estates were observed to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. Records of the purchase, storage and use had been properly maintained. All of the stores were

	containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Regulations. Major Compliance		equipped with exhaust fans and secured. Only authorized personnel are allowed to handle the chemicals. All the chemicals were stored and segregated accordingly. The class 1b chemical, Methamidophos, was more used as SDPB had changed it to Acephate, which is class III chemical. Empty pesticides containers had been triple rinsed, holes punched in them and stored separately in the scheduled waste store.
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	YES	Pesticide applications were guided by SDPB's ARM, Pictorial Guide, CHRA and by MSDS supplied by the manufacturer. The CHRA on both estates was conducted by competent person in 2015.
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. Major Compliance	YES	Aerial spraying is not a practice in all SDPB estates. There was no evidence to show that such a method being used in both Tennamaram and Bkt Talang Estates.
4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide handling shall be demonstrated or made available. Minor Compliance	YES	The staffs and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be used in a safe manner. Records showed that training had been carried out. No associated smallholders at SOU Tennamaram. Employees demonstrated knowledge and skills on pesticide handling. MSDS/CSDS was displayed in local Bahasa Malaysia language at the agrochemical store for each chemical stored as well as the use of safety pictorial poster for the easy understanding of the agrochemical handlers.
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated. Minor Compliance	YES	The Waste Management Plan for 2017/18 has been established. Details are shown below. The practices in managing the waste are common to all the units in the SOU. Guidelines are assisted by PSQM personnel.
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, demonstrated. Major Compliance	YES	All sprayers, storekeepers and workers handing pesticides in both estates were sent for annual medical surveillance and the records presented to the auditors.

	4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women Major Compliance	YES	Both Estates had Internal Memos "No Work with Pesticides for Confirmed Pregnant and Breast-Feeding Women" signed by the respective managers. List of sprayers were maintained by Medical Assistant (MA). Identification of pregnancy and breastfeeding was done by the MAs and HAs based on interview with women workers on the last period date and examination of lactation. This interview is done during the monthly medical check-up conducted, including for breastfeeding. Doubtful cases were sent to the Visiting Medical Officer (VMO) for pregnancy test. There was no evidence that work with pesticides was undertaken by pregnant or breastfeeding women.
C 4.7 An occupational health and safety plan is documented, effectively communicated and implemented.	4.7.1	An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. Major Compliance	YES	Group Occupational Safety & Health Management Policy had been established and implemented. The policy was signed by the Managing Director of Sime Darby Plantation dated January 2015 and is displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the Regional PSQM Executives and monitored by PSQM Department at Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors.
The occupational health and safety plan shall cover the following:	4.7.2	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance	NO	HIRARC for both estates are available and formalised in 2013. All the main activities were covered and Tennamaram Estate had an extra for the effluent land application furrow system. HIRARC for Tennamaram & Bt. Talang Estate was reviewed for the formalisation of the 2017/18 assessment. All HIRARC were verified and approved accordingly. Howevr, during site visit at Tennamaram POM, was sighted that hazards of skimming of oil at clarifier tank are not addressed and documented and not been assessed in HIRARC. Also was sighted that worker accident occurred on 18/8/17 was not discussed in the OSH meeting held on 9/11/17 and risk assessment was not reviewed immediately as per SOP-SDPMS Chapter 6. Thus, #Major NCR RAR 02 2017 has been raised.
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. Major Compliance	YES	At Tennamaram and Bukit Talang Estates, auditor has visited all the work operation noted that sprayers were fully equipped with mask, rubber gloves, rubber boots & apron. Along the journey inside the field drivers and harvesters were observed to be in safety helmets and their sickle, harvesting knife covered with the approved type. Auditor also verify the PPE issuance book and recorded all PPE has been given and replaced according. Trainings were provided during musters and also in session held in the estate community hall. Therefore Past Major NCR STK-03 2016 was closed. The following training made for the employees were recorded as follows. Subjects extracted were mainly related to ESH, SOPs, and pesticides handlings.
	4.7.4	The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety	14	Both the Estate Managers were appointed as the Chairman of the ESH committee. The Assistants respectively for both Estate were assigned as the OSH coordinator and responsible for all safety and environmental issues. All appointments are valid for a 2 year term. All relevant letters were sighted and verified.

		and welfare shall be discussed at these meetings, and any issues raised shall be recorded. Major Compliance		Both estates nd mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. The meetings were held between Jan to Nov 2017.
	4.7.5	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. Minor Compliance	YES	Accident and Emergency procedures have been established, the following were reviewed: i) SDPB / 01/08 - Accident Investigation and Investigation Procedure ii) SDPB / 01 / 08 - Crisis Management & Emergency Response Plan which addressed responses to emergency situation related to bund break, fire breakout, CPO pipe burst & fire, flood and chemical spill. iii) Emergency Evacuation Procedures Each estates and mill had procedures for handling of fire & flood, chemical spillage & motor vehicle, wild & poisonous animal attack, first aid team. There are formation of ERP Team & ERP for all the identified incidences. The organisation chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were produced by PSQM and amended to tailor to the situation differences in the estates and mills. Sighted drills conducted by the estates for chemical spillage and fire drill.
	4.7.6	All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	YES	Estate workers are provided with Medical Care and covered by accident insurance. VMO visit log to estates line site, sprayer, manure, and chemical handler check-up which was carried out on a weekly basis was reviewed. Local workers, covered by SOCSO. Verified through 'Jadual Caruman Bulanan'. Foreign workers, covered by Workmen Compensation provided as per Compensation Act 1952.
	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	YES	Records of all accidents are kept in both estates for a min of 10 years. Incidences are recorded using LTA Lost Time Accident. Cases if any are reviewed during safety meetings. Where required submissions of JKKP 6, 7 & 8 to DOSH were in compliance with the legislative requirement.
C 4.8 All staff, workers, smallholders and contract workers are appropriately trained.	4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. Major Compliance	YES	Formal training programmes for 2017/18 that covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs were available for all the audited sites. Training Plan was for each operating units were established. A training need identification matrix has been established with target dates for the training identified. The training program includes: ESH Legal & Other requirements, Safe handling of electrical equipment, Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000, Accident Investigation Techniques, Emergency Respond Plan Training (e.g. Chemical spill, poisoning, Fire. Lightning), Competent First Aider Training etc
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	YES	Tennamaram SOU continued to train its executives, staff and workers. Records of training were kept in the training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue. Some Details of training are:

Principle 5: ENVIRONMENTAL RESPONSIBILITY AND CONSERVATION OF NATURAL RESOURCES AND BIODIVERSITY

Clause	Indicators		Comply Yes/No	Findings
C 5.1 Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts	docu Majo	environmental impact essment (EIA) shall be umented. or Compliance	YES	The CU has established its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) which covers from upstream activities such as FFB reception until downstream processes was sighted during assessment. Identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the significant environmental aspects are the boiler stack emission which is associated with air emission, palm oil mill effluent (POME) discharge (water pollution) and land contamination which related to the management of scheduled wastes and general waste. For estate operations, all activities from harvesting, pest and disease, upkeep programme until delivery to mill have been identified.
and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	curre mitig time deve withi plan iden pers	acts requires changes in ent practices, in order to gate negative effects, a table for change shall be eloped and implemented in a comprehensive action. The action plan shall	YES	Significant environmental aspect and impact was derived from the environmental impact evaluation (EIE) and captured in the 'Pollution Prevention Plan'. Those activities evaluated as significant were monitored using the mitigation measure established for each significant activities. Sighted wastewater management plan and waste management plan developed for the CU. i) Environmental Aspect Identification Summary FY2017/2018 reviewed on 26 th Jan, 2017. ii) Environmental Impact Evaluation Summary FY2017/2018 reviewed on 26 th Jan, 2017. The management has periodically reviewed the implementation and effectiveness of the established program. The responsible person is the Assistant Mill Manager. Environmental Aspect and Impact Identification Form & Environmental Impact Evaluation Form used to identify Aspect & Impact and take necessary action. Reviewed on 01/07/2017 by the Assistant Mill Manager and approved by the Mill Manager. Environmental Improvement Plan FY 2017/2018 comprising of Pollution Prevention Plan has been established. For both Estates here is no change in the existing practices required to mitigate negative effects based on identified impacts for both the mill and estates. a) The estates have conducted periodical review on the aspects and impacts identified and evaluated as registered. b) The estates have continuously implemented annual programs that were established as part of its individual Pollution Prevention Plan. c) Managers and Assist Managers of estates were identified as person-in-charge of the programs which were established upon review of the aspect and impact register. d) Significant environmental aspect and impact was derived from the environmental impact evaluation (EIE). Those activities evaluated as significant were monitored using the mitigation measures established for each significant activity.
	mon oper be i effec mea	plan shall incorporate a itoring protocol, adaptive to rational changes, which shall mplemented to monitor the ctiveness of the mitigation sures. The plan shall be ewed as a minimum every	YES	Tennamaram POM No changes were made to the environmental aspects and impacts or current practices which require changes in the environmental action plans at POM. Nevertheless, the existing environmental action plans had identified timeframes and responsible person at each operating unit assessed and it can be concluded that the Y2016/2017 performance was verified and found to be satisfactory.

		two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. Minor Compliance	Bukit Talang and Tennamaram Estate An environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. Pollution prevention plan and waste management plan was reviewed on yearly basis and was verified at all visited operating units. Sighted and extracted the following environmental management plan for Tennamaram and Bukit Talang Estate 2017/18. It has been noted that FY2016/17 performance was verified to be satisfactory.
The status of rare, threatened or endangered species other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that	5.2.2	Information shall be collated in a HCV assessment that includes both the planted area itself and relevant wider landscape-level considerations. Major Compliance Where RTE species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan. Major Compliance	The CU has conducted assessment on HCV in June 2014. The report titled 'HCV Re-Assessment For Selangor Central Zone: Strategic Operating Unit SOU 6 Tennamaram and SOU 7 Bukit Kerayong' dated December 2015. Based on the report, the HCV4 areas which have been identified in the Tennamaram SOU 6 were: water catchment areas at Tennamaram & Bukit Talang Estate, and the pond at Sg. Buloh Estate. Total HCV area in the Tennamaram SOU is 3.26 ha. Bukit Talang Estate is adjacent with peat swamp forest named Raja Musa Forest Reserve. No RTE species found in the Tennamaram SOU. The HCV areas within Tennamaram SOU were as explained in Indicator 5.2.1. The visited estates has maintained its HCV4 which are the water catchment areas at Tennamaram & Bukit Talang Estate.
	5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instituted in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. Minor Compliance	Although there was no RTE species found in the CU, Sime Darby still established their own disciplinary measures if any of their staff or workers found to capture, harm, collect or kill the RTE species. If found any activities to capture, harm, collect or kill RTE species, the estates will make a report to the Wildlife Department immediately.
	5.2.4	Where an action plan has been created there shall be ongoing monitoring: The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;	Progress of implementation of the action plans 'HCV Action Plan 2017/2018 – for Bukit Talang and Tennamaram Estate' were reviewed and verified on the ground. The CU has conducted an ongoing monitoring of their HCV4 the latest conduct was on 1, 2, 3 and 4 December 2017. No RTE species were found within the estates area. Noted the CU had continued to implement planned actions such as awareness to the staffs and public on enhancing biodiversity, posting of relevant information in the Sime Darby webpage and erection of signage at strategically locations. Both estates have cooperated with Selangor Forestry Department, Global Environment Consultant and Department of Environment on a project to rehabilitation encroachment area in the Raja Musa Forest Reserve.

	5.2.5	Outcomes of monitoring shall be fed back into the action plan. Minor Compliance Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated		Local communities that lived nearby to the CU did not depend on the HCV area for their living needs. Therefore, this indicator was not applicable to this Certification Unit.
		agreement that optimally safeguards both the HCVs and these rights. Minor Compliance		
C 5.3 Waste is reduced, recycled, re-used and	5.3.1	All waste products and sources of pollution shall be identified and documented. Major Compliance	YES	All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2017/2018. The compilation for Financial Year 2017/2018 was made at SOU level.
disposed of in an environmentally and socially responsible manner.	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	NO	Empty chemical containers were triple rinsed, and disposed through approved licensed contractors under a recycling program registered under Jabatan Pertanian. Approval letters sighted. However, during site visit at Tennamaram Estate, it was sighted that the Schedule Wastes items (SW 404) were not disposed according to Environmental Quality (Scheduled Wastes) Regulations 2005; latest disposal recorded in March 2017. #Major NCR RAR 01 2017 was raised for CU to address the issue.
	5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. Minor Compliance	YES	It has been verified that there are procedures and guidelines in the disposal of wastes and pollutants issued by the SDPB Head Office level to minimise pollution on the routine operation.
C 5.4 Efficiency of fossil fuel use and the use of renewable energy is optimised.	5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. Minor Compliance	YES	POM Objective and target for optimizing / reducing on use of fossil fuel plan FY2017/2018 was established. Among the programmes that have been implemented included to minimize wastage of diesel (vehicle). Action plan taken by management: • Driver to adhere to "engine switch off policy during recess & parking". • Timely servicing of vehicle to maintain engine efficiency to avoid unnecessary high diesel consumption. • Recording of daily diesel consumption for each vehicle to detect any inconsistency in diesel consumption. • Weekly checking piping and diesel tank if any leakage.
				Bukit Talang and Tennamaram Estate A plan for improving the efficiency of the use of fossil fuels was established. It has been incorporated into the Environmental Aspect and Impact activities report for 2017 /18. The document was updated on every new Financial Year.

					Target	Objective	Action plan
				1	Backhoe, tractors	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile machinery/equipment To reduce fossil fuel (diesel)	1) ensure the vehicle engine is turn off during idle time 3) record vehicle activity which consume fuel
					vehicles	consumption from company-owned vehicles and fuel using mobile machinery/equipment	eliminate waste activity which consume
C 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN	5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Major Compliance	YES	2015, were	, 2016 and 20 ⁷ felled, shredde	17 replants visited during the audit in ed, windrowed and left to decompose	
guidelines or other regional best practice	5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Minor Compliance	YES	estate	es had adhere	d to the Zero Burning Policy of SDPE	
C 5.6 Preamble Growers and millers commit to reporting on operational greenhouse gas emissions. However, it is recognised that these significant emissions cannot be monitored completely or measured accurately	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).	YES	gased enviro impad Enviro pollut Amor	ous emissions, onmental aspect (EAI) record onmental Imprision, was in plang the signification and gases of Water discusterilizer of Land – Scith Clinical was	particulate / soot emissions and efflicts/impacts register associated with as which covers estate and mill act ovement Action Plan' – is used to ince and is reviewed accordingly. In the environmental receptors for the estans – from boiler stack (smoke and plant), GHG emission from anaerobic procharges – Cleaning water / run-off ondensate/clarification waste) and be neduled waste, domestic waste and instes – generated from clinics.	coarticulate), vehicle and generator (smoke cesses (ETP, EFB dumping). / process station waters (hydrocyclone / piler quenching water and blowdown. industrial / process waste.
with current knowledge and methodology. It is also recognized that it is not always feasible	5.6.2	Significant pollutants and GHG emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	YES	The Cassoc	CU has continuctiated to its acted. a) The object	ed to maintain its documented plans	reduction on the website Sime Darby was mission by the year 2020 via carbon

or practical to reduce or minimise these emissions.				b) In Tennamaram POM, metha a biogas plant. However, to commissioning stage.	the plant is still	in the construction	on stage and now on	
Growers and millers commit to an implementation period until the end of December 2016 for promoting best practices in reporting to the RSPO, and thereafter to public reporting. Growers and millers make this	5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. Minor Compliance	YES	The CU had used RSPO Palm GHO emissions. Sighted report sends to F following were determined: Milling extraction rate:				
commitment with the support of all other stakeholder groups of the RSPO. Plans to reduce				POME Fuel consumption	40656.79	0.2		
pollution and emissions, including greenhouse gases,				Grid electricity utilisation	1502.62	0.01		
are developed, implemented and monitored.				Export of excess electricity to housing	0	0		
monitored.				Sale of PKS	0	0		
				Sale of EFB	0	0		
							Total	42260.5
				Estate emissions:	Lioop	L.000 //FFD		
				Emission sources	tCO2e	tCO2e/tFFB		
				Land Conversion	86832.53	0.47		
				CO2 Emissions from Fertiliser	7227.2	0.04		
				N2O Emissions	11239.23	0.06		

Fuel Consumption	1453.68	0.01
Peat Oxidation	33008.97	3.2
Sinks	0	0
Crop Sequestration	-81224.64	-0.44
Conservation Sequestration	0	0
Total	58536.97	0.29
The final emissions value per produ	ct are:	
CPO 1.84 tCO2e/t		
PK 1.84 tCO2e/t	PK	

Principle 6: RESPONSIBLE CONSIDERATION OF EMPLOYEES AND OF INDIVIDUALS AND COMMUNITIES BY GROWERS AND MILLERS

Clause	Indicators		Comply Yes/No	Findings
C 6.1 Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance	YES	A Social Impact Assessment (SIA) and records of meetings maintained by the CU. The assessment was conducted on 17-19 June 2014. In addition, an Addendum Social Impact Assessment (SIA) for Elmina Division (of Tennamaram Estate), which formerly under SOU 7 (Bukit Kerayong), was conducted on 9/12/15. All data has been gathered with the participation of external and internal stakeholders. The assessment has reported sampling and data collection procedure, demographic information, issues, complaints, suggestion from workers, interview with stakeholders (workers, union, contractors, suppliers, local community, local government and private bodies) and summary analysis. Records of meeting were documented and made available.
plans to mitigate the negative impacts and promote the positive ones are made,	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	YES	Based on the records available, there is evidence that the assessment was done with the participation of affected parties, whose attendance was documented and sighted during the audit.
implemented and monitored, to demonstrate continual improvement.	6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and	YES	The CU continued to implement and review its social plan. The plan derived through the SIA and consultations with internal and external stakeholders during latest stakeholder meetings. Among the plan implemented were: Tennamaram POM - Transport fee to Hospital allowance need to increase due to petrol price hike and management has meeting with HR, NUPW and MAPA regarding this matter and Hr will decide on this. Completed in May, Workers request to deduct RM 50 to saving for festive season, and management has request through Labour office and now waiting approval, targeted completed on

		timetabled, including responsibilities for implementation. Major Compliance	for with HRU Tennama and Augu complete and mana January 2 Bukit Tala meeting w	January 2018 and Repair workers quarters late, Mill has follow the procedure and already discuss with HRUM, NUPW and MAPA and completed discussion on Dec 2016. Tennamaram Estate - Complaints regarding piping and doors at workers quarters and done on July and August 2017, nearby village requested to build a bus stop in front of village and target date to complete on February 2018 and one of the schools request to subsidize the electricity bills at school and management will discussed with HQ regarding this matter and target date to complete on January 2018. Bukit Talang Estate - Complaints regarding kettle barn nearing to linesite and management already meeting with affected parties and target date to transfer to another place is 16 Dec 2017, complaints regarding Road at linesite, already completed on 30 Nov 2017, request from workers to place light lamp nearing linesite road and management already put in the budget 2018/2019.
	6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. Minor Compliance	YES	The SIA Action Plans are being updated every year, or sooner, such as when issues arise and are discussed with the affected parties.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	YES	Not applicable. There was no smallholder schemes included in the CU.
C 6.2 There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties	6.2.1	Consultation and communication procedures shall be documented. Major Compliance	YES	External and internal communication procedures developed by SDPB for the estates and mill maintained to be followed and available at the audited sites. Consultation and communications procedures for SOU 6 Tennamaram is documented in the Standard Operating Manual dated 1 April 2008 entitled "Procedure for External Communications". This document was sighted during the audit. An examination of the records kept in the internal and external communication files found that the estates and mill followed the procedures and manuals developed by the company. In the case of internal communications, records of meetings, briefings and memos were sighted. Notices and posters / pamphlets observed displayed on notice boards at the office and the muster ground were also used as a means of internal communication. Regular morning briefings were used by the management to communicate policies, procedures, rules and regulations and other information to its employees. In the case of external communications, they were mainly in the form of correspondence, which were kept in the External Communication File.
	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	Nominations of management official responsible for these issues were carried out via letters of appointment. Each appointment was for one year. The job scope of the appointees state that among other things that they are to investigate complaints, counsel and advice on social issues, assist in carrying out programmes or trainings on social issues.
	6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that	YES	The list of stakeholders for SOU 6 Tennamaram are maintained, and made available during the audit. The stakeholders comprise contractors, vendors, neighbouring estates/smallholders, government agencies, etc. Records of communications are documented and filed. Records also

		efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. Minor Compliance		show actions taken in response to inputs from stakeholders, and that efforts are made to ensure understanding by affected parties. The stakeholder lists were updated.
There is a mutually agreed and documented system for dealing with complaints and grievances, which is	6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. Major Compliance	YES	The system used by the SOU 6 Tennamaram in resolving disputes exists in the procedure called "Tatacara Perundingan Dalam Menangani Masalah Sempadan". When ensuring anonymity of complainants and whistleblowers, the Sime Darby Code of Business Conduct provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ. Sime Darby also maintained published guideline pertaining whistle blowing at http://www.simedarby.com/about-us/governance/whistleblowing .
	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance	YES	There were no complaints / disputes recorded from external stakeholders observed within the covered audit period, except previous complaint mentioned in 6.1.3, which had been resolved and updated (documented) in Action Plan. Complaints were mainly about request from employees related to house repairs. Complaints (request) and action taken were recorded in the Complaints Book.
C 6.4 Any negotiations concerning compensation for loss of legal, customary or	6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. Major Compliance	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Sustainable Plantation Management System document. The procedure stipulates that ex-workers issues be handled by Employee Relations, and the land issues by the Land Management Department, at Head Office. Both procedures stipulate the negotiation procedures, calculation and distribution of compensation to affected parties.
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.	6.4.2	A procedure for calculating and distributing fair compensation shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance	YES	In accordance with the Procedures for Handling Boundaries Disputes (see 6.4.1 above), the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department office at the Sime Darby Head Office. The procedure stipulates for negotiation procedures to involve the respective estate management, Land Office, NGOs and the affected parties.
	6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be	YES	No case of compensation related to loss of legal or customary rights of indigenous peoples, local communities or external stakeholders was observed.

C 6.5 Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages	6.5.1	documented, with evidence of the participation of affected parties, and made publicly available. Major Compliance Documentation of pay and conditions shall be available. Major Compliance	YES	For the SOU 6 Tennamaram documentation of pay is in the form of monthly pay slips. Conditions of pay are contained in the workers' respective employment contracts. Samples of the monthy pay slips and employment contracts were made available and reviewed during the audit. Each pay slip documents the name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions (statutory such as EPF, SOCSO and non-statutory such as donation to mosque funds), net salary, annual leave and medical leave taken, etc. Interview with workers reveal that they understand the contents of the pay slips and seeks explanation from the office whenever they needed any clarifications. Samples of payslips were also sighted and verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages Order 2016 and Employment Act 1955.
C	6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment shall be available in the languages understood by the workers or explained carefully to them by a management official. Major Compliance	YES	Contracts for local and Indonesian foreign workers at Tennamaram Estate, Bukit Talang Estate and Tennamaram Palm Oil Mill were sampled. The terms and conditions of employment are contained in the employment contracts and include duration of employment, place of work, salary, working hours, medical benefits, accommodation, annual leave, sick leave, termination of service, and other benefits provided. For contracts that were prepared in English, explanation and briefing were given to the workers prior to signing. This was further confirmed by the workers during interviews.
	6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible. Minor Compliance	YES	Adequate housing is provided to all employees of Tennamaram Palm Oil Mill, Tennamaram Estate and Bukit Talang Estate. Site visits were carried out at the workers' housing. The houses were generally in good conditions, and in a good state of repair. Each house has between 2 – 3 bedrooms and furnished with bed and cupboard. All houses are provided with water and electricity supplies. While water is provided free of charge, electricity is subsidised. Water to workers' housing is provided in rotational basis, but nevertheless, the workers do not see this as an inconvenience because of the existence of water storage tanks. Other facilities provided for the workers' children are creche and pre-school. Workers' children are given free transportation to HUMANA/Community Learning Centre/government schools. In addition, all workers are given RM100 each during the annual festive season, RM5 per month phone allowance, and each school-going child receive RM100 each year. A clinic which provides free medical treatment to all workers and their dependants is also available at Tennamaram Estate and Bukit Talang Estate. A Visiting Medical Officer visits the clinic once a week to review cases, and provide guidance to the medical assistants where necessary. Other amenities available are mosque, community hall, and playing field and grocery shops.
	6.5.4	Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to food. Minor Compliance	YES	The CU located nearby urban areas which surrounded with local amenities, including access to adequate, sufficient and affordable food. Further, there is canteen inside the mill that enable workers to buy their meals. The mill management is monitoring the price of meals as the operator need to display and submit the declared selling price.

C 6.6 The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.6.1	A published statement in local languages recognising freedom of association shall be available. Major Compliance	YES	Recognition of freedom of association is available in the Sime Darby Plantation Social Policy dated January 2015 which states that the company respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. This Social Policy is applicable throughout all operating units and is printed and translated in Bahasa Malaysia and exhibited on notice boards.
	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	YES	The National Union Plantation Workers (NUPW) is the union that represents workers of SOU 6 Tennamaram. Union membership is open to both local and foreign workers. Meetings were carried out accordingly. Among the issues raised were increase rate for School Bus & Hospital and delays in Workers Quarters Repairs.
C 6.7 Children are not employed or exploited.	6.7.1	There shall be documentary evidence that minimum age requirements are met. Major Compliance	YES	The policy on non-employment of children is contained in the the Sime Darby Social Policy dated January 2015. There is also no evidence that the Estates and Palm Oil Mill within SOU 6 Tennamaram employ anyone below the age of 18 years as verified by examining the Master Lists, or list of workers. Interviews with workers and staff, as well as observations made during field visits show that those employed are 18 years and above.
C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability,	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. Major Compliance	YES	The equal opportunities policy is contained within the Sime Darby Social Policy dated January 2015, which states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Social Policy is exhibited on notice boards in both Bahasa Malaysia and English.
gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. Major Compliance	YES	Apart from the Social Policy which states that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees. Payment of wages/salaries, provision of housing and access to benefits and amenities is fair based on observation, review of pay checks, contracts of employment, and interviews of staff, local and foreign workers. Foreign workers are also accorded the same living standards and accommodations as local workers.
	6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. Minor Compliance	YES	Based on interviews with the estate and mill management and documentation review, recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness appropriate for the job. Interview of candidates will be done by Manager and the Assistant Managers where an evaluation form is filled up to determine the suitability of the candidate.

C 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.	6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	The policy to prevent sexual and other forms of violence is contained in the Sime Darby Social Policy dated January 2015. This policy is implemented and communicated to all levels of workforce. Auditor has verify the records that Gender committee in Elmina Division has been re-activated, auditor also verify the meeting dated 6/1/17, no issue has been raised, only appointment of member and Policy training has been discussed, sighted also The Gender has Plan the meeting for next on January 2018.
	6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	The policy to protect reproductive rights of women is contained in the Sime Darby Plantation Gender Policy. In addition, Gender Committees have been established at the Tennamaram Estate, Bukit Talang Estate and Tennamaram Palm Oil Mill to implement and monitor the policy. The Gender Committee meetings and muster briefings are being used as an avenue to disseminate information to its members regarding reproductive rights. This is further confirmed during interviews held with female workers at Tennamaram Estate, Bukit Talang Estate which showed their understanding of their reproductive rights.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented & communicated to all levels of the workforce. Minor Compliance	YES	A grievance mechanism which respects anonimity and protects complaints is in place at SOU 6 Tennamaram, as per the Sime Darby Gender Committee Handbook 1st Edition 2014. Employees are aware of the avenue and mechanism for lodging a complaint. This was communicated to all staff during muster briefings and training.
C 6.10 Growers and millers deal fairly and transparently with	6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. Minor Compliance	YES	Not applicable because the Tennamaram Palm Oil Mill only receives FFB from its own supply within SOU 6 Tennamaram, and none from any FFB from third party suppliers.
smallholders and other local businesses.	6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented. Major Compliance	YES	The CU has continued to receive FFB from the group owned estates. Thus, no pricing mechanism for FFB is applicable. Meanwhile any input / service obtained were based on quotation / tender, prior to select and award.
	6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. Minor Compliance	YES	Based on interviews conducted with suppliers/contractors, there is evidence that they understand their legal obligations under the contractual arrangements, that it is fair, legal and transparent. The interviewees mentioned that due to tough competition, profit margin is low.
	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance	YES	Interview with contractors/suppliers confirmed that payments are made in a satisfactory and timely manner, i.e. within less than 1 month. The MEX payment mechanism noted had been implemented accordingly, which shortened the timeframe of payment process.
C 6.11 Growers and millers contribute to local Sustainable	6.11.1	Contributions to local development that are based on the results of consultation with	YES	The CU continued to contribute to local communities. Interviewed with the neighbouring JKKP confirmed the CU continued to provide grass cutting of sports field at the nearby village and had paved access road to school respective. The CU also has plan to build a bus stop for children at the nearby village but awaiting for approval from the local authority. At Bukit Talang Estate, Sime darby

development where appropriate.		local communities shall be demonstrated. Minor Compliance		has collaborate with Forestry Department and Global Environment Centre to conserve and Rehabilitation of Compartment 32 of Raja Musa Swamp Forest Reserve adjacent To Bukit Talang Estate by Planting <i>Melicope lunu-ankenda</i> . Bukit Talang Estate and Forestry Department are monitoring that area.
	6.11.2	There are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. Minor Compliance	YES	Not applicable. There were no smallholder schemes included in the CU.
C 6.12 No forms of forced or trafficked labour are used.	6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. Major Compliance	YES	Based on interview with workers, reviewing the employment contracts, records of wages, overtime payment, and rest day payments, there is no evidence of any forms of forced or trafficked labour within SOU 6 Tennamaram. In addition, Sime Darby Plantation Sdn Bhd also adopts the Social and Humanity Management Policy dated January 2015 which committed to safeguarding operations from employing forced labour. Foreign workers's pasports are kept at the respective Mill and Estate offices for safekeeping, and written consent for passport surrender are available and sighted. Workers are given a copy of their passports, with the original copies being kept at the Mill and Estate offices for safekeeping.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	YES	Based on interviews with foreign workers all of them were aware of the types of work they would be doing before they arrived in Malaysia. The actual job undertaken was the same as what they were informed about while they were still in their home country in Indonesia. No contract substitution has therefore occurred.
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance	YES	The SOU 6 Tennamaram adopts the Social Policy dated January 2015 which stated that "All employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work and representation race, caste, nationality" There is also a procedure entitled "Sourcing Process for Foreign Workers". Based on observations and interviews of foreign workers, there was no evidence of contract substitution and no discriminatory practices against foreign workers. A post-arrival briefing is also given, on the contents of their employment contracts, safety, benefits etc.
C 6.13 Growers and millers respect human rights	6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations. Major Compliance	YES	The policy to respect human rights are documented in the Sime Darby Plantation's Social and Humanity Management Policy. This Policy states among others, that it will develop its businesses with a sense of humanity, ensuring that they are socially beneficial and do not infringe on basic human rights. This Policy is exhibited on notice boards of the Tennamaram Estate, Bukit Talang Estate and Tennamaram Palm Oil Mill.
	6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. Minor Compliance	YES	Not applicable. The CU located in Peninsular Malaysia.

Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Auditor has verified through www.globalforestwatch.com, google map and map provided by visited estate including site visit, there was no new planting at the SOU 6 Tennamaram as verified by audit team. It can be confirmed that they have no plan for any new planting and no new development of area was observed during the visit. Thus Principle 7 is not applicable.

Principle 8: COMMITMENT TO CONTINUOUS IMPROVEMENT IN KEY AREAS OF ACTIVITY

Clause	Indicator	s	Comply Yes/No	Findings
C 8.1 Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.	8.1.1	The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria. As a minimum, these shall include, but are not necessarily be limited to: Major Compliance		
	a)	Reduction in use of pesticides(Criterion 4.6);	YES	Both estates have introduced a mechanized rotor slashing weeding in all young palms possible areas to reduce the use of chemicals for spraying. The estates continued to manage pests, disease and weeds using appropriate IPM techniques. In order to minimize use of insecticides, the estates had established nurseries for beneficial plants mainly <i>Tunera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> . This was to establish continuity in the planting of beneficial plants. In order to reduce the use of rat baits to control rats, Barn Owls was encouraged as indicated by Barn Owl census records. Until to-date occupancy rate for Barn Owl boxes were also sighted in the fields. Both estates were committed to reduce using of chemicals and now have implemented and will continue to only spray Circles (Strip) and noxious weeds. Soft weeds and <i>Nephrolepis bisserata</i> were planted, maintained and encouraged in the inter rows. Where possible, harvester's paths were grass cut. The estates in replants with flat areas advocated that chipped palm materials be stacked in Close Ended Conservation Trenches (CECT), which will contain water, in order to minimise/prevent breeding of Rhinoceros Beetle, thus reducing chemical control. To further control the Rhinoceros Beetle, the estates used pheromone traps and had programs to cover trunk chips in replants with cover crops. EFB was applied in single layers and is not dumped in large amounts to prevent breeding of Rhinoceros Beetle.

			To control the Bagworm, the estates have planted more nectariferous beneficial plants. This was evident with the presence of polybag young plants in the nurseries. This actions have reduced the use of chemical. The CU also ensure efficient loose fruit collection and expedite circle raking to avoid VOPs.
b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	YES	The CU maintained efforts to improve continuously its environmental management. Environmental action plans were reviewed and implemented according. Details as elaborated in the following documents; (a) Pollution Prevention Plan – FY2017/18. (b) Waste management action plan - FY2017/18. (c) Water management plan – FY2017/18. (d) Environment action plan – FY2017/18. (e) Estate management plan to reduce diesel (fossil fuel) usage – FY2017/18. (f) Action plan to reduce fresh water usage (g) Contingency plan during water shortage (h) Estate management plan to reduce active ingredient (a.i) from chemical usage.
c)	Waste reduction (Criterion 5.3);	YES	SOU Tennamaram CU continued to practice the 3R (reduce, recycle, re-use) on waste management. Waste Management Plan has been established since 2016.
d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	YES	Pollution identification environmental improvement action plan' is used to identify waste products and sources of pollution. The plan has been reviewed accordingly. GHG – Potential sources are being identified using data from SDPB Estates & Mills Upstream Applications (SEMUA). The PSQM personnel from HQ use these data for the monitoring of GHG. Carbon Inventory Calculation Methodology used in the PalmGHG Summary Report was reviewed.
e)	Social impacts (Criterion 6.1);	YES	The CU continued to improve the social impacts with activities like: implementation of retention incentive for foreign workers. constructing sheltered at morning muster area. upgraded of <i>surau</i> and audio system. organized social events for worker and communities, such Family Day.
f)	Encourage optimising the yield of the supply base	YES	Both estates are committed to implement best agricultural practices which included the following: (a) timely and proper fertilizer application; (b) improve on accessibility to maximize crop evacuation. (c) maintaining harvesting interval below 12 days. (d) collect all loose fruit to minimize losses. (e) water bodies and water conservation pits were constructed to conserve moisture. (f) harvester are also paid an incentive allowance

RSPO CERTIFICATIONS SYSTEMS FOR PRINCIPLES & CRITERIA JUNE 2017

Clause	Indicators		Comply Yes/No	Findings
4.5.3 Time-bound plan Note: Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	YES	SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. PT MAS in Indonesia has undergone RSPO Main assessment and was delayed due to some social disputes. The target date for certification was by 2017 subject to the progress of the matter being resolved. As at June 2017, 58% of smallholders land from the total land of associated smallholders in Indonesia has been certified. Certification process for the remaining associated smallholder's areas was on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and out growers by end 2020. Liberia Preparation to undergo the RSPO Certification process was also in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. SDP continues to work on direct engagement with Project Affected Communities (PAC) – working towards a consensus with the PAC to resolve the issues. Further information can be obtained from http://www.rspo.org/members/complaints/status-of-complaints/view/29
fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness; Any revision to the time-bound plan or to the circumstances of the company shall cause	YES	Time bound plan was verified by CB and it can be confirmed that there were no changes to the current time bound plan as verified during this audit. There were no changes to the current time bound plan as verified during this audit.
		the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the		

	company is legally registered with the local notary or chamber of commerce (or equivalent);		
organization This work require evidence	required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB; of elf-nt ch	YES	Based on internal and external audit (ISPO certified) there was no replacement of primary forest or HCV areas in the uncertified management unit.
(b)	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 P&C criteria 2.2, 6.4, 7.5 and 7.6;	YES	Regular discussion was ongoing between Sime Darby Plantation and the group of community through bi-monthly meeting since November 2012; TKKP and the Kerunang & Ketapang team. The most recent one was held in Nov 2016. Issues related to the demands made by TKPP were closed except for two items related to land matters where SDP was engaging with the local authority on this matter together with TKPP. Current discussion was to moving forward especially on the replanting activities. SDP visited the second community group, the Kerunang & Entapang team in Aug 2014 to listen and have a better understanding on their requests. The subsequent meeting with the communities was held in Dec 2014.
(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	YES	Based on internal and external audit (ISPO certified) there was no labour disputed recorded at the CU.
(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	SDP PT Mitral Austral Sejahtera already ISPO certified by MUTU Certification International on 30/11/2017 and there was no issue on legal non-compliance for all uncertified unit.

(6	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 4.5.4 (a) – (d) above by the audit team based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		-
		•	NO	During the audit, there was only progress report (dated in Sept 2017) to RSPO on complaint filed against PT Mitra Sejahtera, but no reports to show compliance for another requirement as required by this certification system document. NCR RAR 03 2017was issued for further information on how SDP address this requirement. Records for internal audit was not available during the audit.
		Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.	YES	It was evident that in handling uncertified management unit, SDP engaged with TuK-Indonesia and continued to work on direct engagement with PAC in order to achieve the consensus with the PAC to address all unresolved issues.
		Desktop study e.g. web check on relevant complaints	YES	Further information can be obtained from http://www.rspo.org/members/complaints/status-of-complaints/view/29
		If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.	YES	There was no non-compliance found for all requirements during this audit

Note:

For example, if an NC against a major indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless that is actively addressed;

2. Failure to address any outstanding NC within uncertified unit(s) regarding 4.5.4 (a)-(d) may lead to certificate suspension(s) to the certified unit(s), in accordance with the provisions of these Certification Systems.

^{1.} For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&C.

Attachment 4

Details of Non-conformities and Corrective Actions Taken

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
2.1.1 NCR STK 02 2017	Major	Findings: Evidence of legal compliance on medical surveillance was not available. Objective evidence: 1. Bukit Talang Estate (BTE): Evidence to show that the follow up medical surveillance as recommended in Medical Surveillance Report 2016 dated 1/02/2017 was not available. 2. Tennamaram POM (TPOM): Monthly report to DOE regarding disposal schedule of EFB and location of EFB dumping area was not available as per "Jadual Pematuhan".	1. BTE The Estate management will conduct the follow up test for the workers before 20 Feb 2018. 2. TPOM Estate management will provide EFB application schedule to mill management on monthly basis and mill management will submit the schedule to DOE Office.	Sighted the following supporting documents as evidence of the corrective action had been taken. The workers were re-sent for medical surveillance at in Dec 2017. And sighted the POM already send report of EFB Application for the Month of November. Status Closed.
4.1.1 NCR STK 03 2017	Major	Findings: Standard Operating Procedures (SOPs) for estates on monitoring of peat soils was not available. Objective evidence: On both Tennamaram Estate and Bukit Talang Estate the SOP for monitoring of Peat Soil Subsidence was not available.	HQ will liaise with the Upstream Operation for establish the SOP of monitor soil subsidence at the peat area. The completion date before Mac 2018.	Sighted the evidence that SOP of monitor soil subsidence has been develop named 'Peat Subsidence Gauge Installation SOP', The SOP explained how to monitor peat Subsidence. Status Closed.
4.1.2 NCR STK 01 2017	Minor	Findings: The Standard operating procedure (SOP) for "Pemandu Kenderaan" was not implemented. Objective evidence: Tennamaram Estate: Hydraulic Oil from Tractor No. TF10 carrying out P&D spraying in Field 2010C was found leaking.	The estate management, are waiting for two quotations from the local contractor and the tender will be awarded to the lowest. Failing which, the tractor will be sent to the SDI for the major maintenance. The estimate completion date before end the FY 17/18.	Corrective action plan accepted Status: Open the implementation will be verified next audit
4.7.2 NCR RAR 02 2017	Major	Finding: • Hazards of skimming of oil at clarifier tank are not addressed and documented.	Next OSH meeting in Feb 2018 will be discuss more detail regarding accident occurrences such as accident report	Auditor has received evidence Adjourned Safety meeting for accident review has been conducting to revise HIRARC on 3/1/18 and

		Worker's accident is not reviewed and discussed in the OSH meeting. Objective evidence: At Tennamaram POM Hazard identification and assessment are not documented in the HIRARC file. Worker accident occurred on 18/8/17 was not discussed in the OSH meeting held on 9/11/17 and risk assessment was not reviewed immediately as per SOP-SDPMS Chapter 6.	briefing, root caused, action plan and etc. Mill management will review the HIRARC for clarification station immediately. Corrective Action Plan 1. The reviewing of the HIRARC will be include in the OSH meeting regardless that HIRARC was update previously. 2. The SQM CER will responsible to ensure that the HIRARC up to date and consider to highlights as finding during the internal audit if the HIRARC was not update. 3. To conduct HIRARC training to the related person in charge.	HIRARC has been revised and updated on 5/1/18. Status Closed.
5.3.2 NCR RAR 01 2017	Major	Finding: Chemical containers were not disposed accordingly. Objective evidence: Tennamaram Estate: Schedule waste items (SW 404) was not disposed according to Environmental Quality (Scheduled Wastes) Regulations 2005. Sighted last disposal on 21/03/2017.	Schedule waste disposal has been liaise with licensed contractor however there are some problem with the disposal arrangement and issue/ Hence, the Estate Management decided to engage with another contractor for the disposal of the SW item SW 404. SQM Regional will arrange the schedule waste training to the person incharge and to ensure the schedule waste management in order as per EQA (schedule waste) regulation 2005.	Auditor has received evidence that SW 404 already disposed using licensed contractor in Dec 2017. The Schedule waste training to the person in-charge and to ensure the schedule waste management in order as per EQA (Schedule Wastes) Regulation 2005 has been organized with DOE on January 2018. Status: Closed
RSPO Certification System Document (2007) NCR RAR 03 2017	Major	Finding: There was only progress report to RSPO on complaint filed against PT Mitra Sejahtera (PT Mas) dated 8 September 2017, but no reports to show compliance for another requirement.	Internal assessment to review the certification system requirement has been carried out on 9-10/11/2017. With regards to the land dispute issue, the RSPO Secretariat has been well informed on the progress through regular briefing and progress reports. The latest meeting with the RSPO Secretariat was held on 8/9/2016. As of to-date, nine progress reports were provided to RSPO, with the most recent report was submitted on 30th June 2016. Further information can be obtained from http://www.rspo.org/members/complaints/status-of-complaints/view/29	Internal assessment has been carried out on 9-10/11/2017 by PT Mas. SDP PT Mitral Austral Sejahtera was already ISPO certified by MUTU Certification International on 30/11/2017. It was concluded that there was no issue on HCV, legal non-compliance and labour disputes, for all uncertified units. With regards to the land disputes, the action to address the issues were on-going. Engagement between SDP and the two relevant communities and stakeholders were evident. Communication between SDP

				and RSPO EB was also reviewed and it can be confirmed that the process to remediation unresolved issues were in progress. Status: Annual updated report will be verified for next audit
D.4.1 NCR MZK 01 2017	Major	Findings: Non-compliance with Sime Darby Plantation SOP Sustainable Supply Chain and Traceability Objective evidence: Tennamaram POM: Consignment note FFB/Weighbridge Ticket from Certified estate did not contain RSPO Certificate No. as per stated in the SOP item 6.0 Delivery of FFB from the Estate	The SQM Central East Region will liaise with the IT Department to update the system via VNC connection. The estimate to complete on 5 January 2018. Corrective action plan: 1. IT Department will issue the access password to the SQM CER team (limited to update parts certification only). 2. To conduct the SCCS SOP training to the weighbridge operator. 3. To establish the manual stamping and will be using if the SIME WEIGH system having a problem.	Auditor has received evidence the System already repaired, and sighted the latest WB ticket dated 22/2/18 has been contained with RSPO Certificate number. Status Closed.

Attachment 5

RSPO Supply Chain at the palm oil mill – Identity Preserved Model – Module D

Item No	Requirement NOV 2014			Findings dard Nov 2014
D.1	A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are	Actual (Dec 2016 - No		uaid 1107 2014
D.1.1	sourced from its own supply base certified to the RSPO Principles and Criteria	Actual (Dec 2010 - NO	74 2017)	MT
D.1.1	(RSPO P&C). Certification for CPO mills is necessary to verify the volumes and	a) FFB Received		258,100.84
			050 400 04	230,100.04
	sources of certified FFB entering the mill, the implementation of any processing	RSPO	258,100.84	
	controls (for example, if physical separation is used), and volume sales of	Non-RSPO	0	057.004.00
	RSPO certified products. A mill may be taking delivery of FFB from uncertified	FFB Processed	0== 004 00	257,231.93
	growers, in addition to those from its own certified land base. If a mill processes	RSPO	257,231.93	
	certified and uncertified FFB without physically separating the material then	Non-RSPO	0	
	only Module E is applicable.	CPO Production	51,160.84	
		PK Production	14,147.76	
	To verify:			
	a) the volume of certified FFB entering the mill	b) Delivery of CPO		
	b) the volume sales of RSPO certified	RSPO(IP)	41,213.63	
		RSPO (MB)	0.00	
		Non-RSPO	4,203.79	
		Delivery of PK		
	The claim only the volume of oil palm products produced from processing of	ŘSPO (IP)	11,486.44	
	the certified FFB as IP	Non-RSPO	0.00	
D 2	Explanation	Projection (Dec 2017 -	- Nov 2018)	
D.2.1	Estimate total tonnage of CPO and PK potentially produce in a year	, ,	•	MT
		a) FFB Received		229,730.85
		['] RSPO	229,730.85	·
		Non-RSPO	0	
		FFB Processed	· ·	229,730.85
		RSPO	229,730.85	220,100.00
		Non-RSPO	0	
		CPO Production	48,243.48	
		PK Production	12,635.20	
		1 K i loddelloli	12,033.20	
		b) Delivery of CPO		
		RSPO(IP)	48,243.48	
		Non-RSPO	70,243.40	
		Delivery of PK	12 625 20	
		RSPO (IP)	12,635.20	
D. C.	Fundame Com	Non-RSPO		a autoria manufacione de fancia.
D. 2	Explanation		•	porting requirements for supply chain through the
D 2.2	The mill must also meet all registration and reporting requirements for the	RSPO supply chain ma	naging organiztion	n (RSPO IT platform).

	appropriate supply chain through the RSPO supply chain managing organiztion (RSPO IT platform or book and claim).	
D 3 D 3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements in these requirements; b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.	 a) Tennamaram POM had revised their documented procedure title 'Standard operating procedure (SOP) for Sustainable Supply Chain and Traceability', version 2, dated Oct 2016. The procedure described the following: Clause 4.0 ~ the responsibility of for the implementation of RSPO SCC i.e. head of operating unit Clause 5.0 ~ Control of document & records such as weighbridge tickets, consignment note, training record & contracts. Record retention for 10 years. Define the critical control point (CCP) :estate — weighbridge, mill — weighbridge, admin office, ramp, CPO dispatch area, CPO storage tank. Kernel silos. Clause 6.0 — Delivery of FFB from the estate — relevant record involved, flowchart for crop diversion, list of mill and their supply chain model i.e. IP or MB Clause 7.0 ~ Receiving FFB at the mill — list of supply base, rules for determining diverted FFB destination, relevant record Clause 8.0 ~ process monitoring — for IP model mill need to ensure no mixing of RSPO certified and non-certified Clause 9.0 ~ CPO and PK dispatch — [Clause 9.1] all delivery of CPO and PK shall be in accordance with the contract allocated by Global Trading & Marketing (GTM) department. [Clause 9.2] Outgoing document for CPO and PK 9e.g. contract, weighbridge ticket / dispatch note) shall specify the following information which can be either presented in single document or across a range of document Trade name / RSPO IP, RSPO certificate no. : RSPO 0025, Clause 10.0 ~ Non-conforming material / product — requirement to downgrade the RSPO Product Clause 11.0 ~ product claim — shall follow RSPO rules on market communication & claim Clause 12.0 ~ Outsourced contractor - the mill has established list of outsourced contractor. Sighted list of transporter for CPO and PK. Clause 13.0 ~ Training — the mill shall provide training for relevant personnel carrying the task at tech critical control point (CCP). Clause 14.0 ~ Reclassifica
D 3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	Tennamaram POM has implemented Clause 7.0 – Receiving FFB at the mill of Sime Darby Plantation, Plantation Quality Management System, <i>Standard operating procedure (SOP) for Sustainable Supply Chain and Traceability f</i> or receiving and processing certified and noncertified FFBs. As of to-date, there is no non-certified FFB receive.

D.4 D.4.1	Purchasing and goods in The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.	Tennamaram POM will only accept the RSPO certified FFB which are from Sime Darby's own estates i.e. Sg Buloh Estate, Tennamaram Estate and Bukit Talang Estate. Monitoring records titled as "RSPO Records for Oil Mills" has recorded the tonnage of certified FFB and its supplying estate. Verified through Tennamaram POM weighing system called 'SimeWeigh'. There was non-certified FFB received based on the records. It was found that the Consignment note FFB from estate did not contain RSPO certificate No as per stated in the SOP for Sustainable Supply Chain and Traceability item 6.0 Delivery of
D 4.2	The site shall inform the CB immediately if there is a projected overproduction.	FFB from the Estate para 6.3. Therefore Major NCR MZK 01 2017 was raised. There was no overproduction of certified CSPO during the period under review (Dec 2016 – Nov 2017).
D.5 D.5.1	Record keeping The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.	Tennamaram POM has maintained the three-monthly accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record titled as "Mass Balancing Records for Oil Mills".
D 6 D.6.1	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from noncertified material including during transport and storage.	For the period under review, Tennamaram POM has deliver RSPO certified CPO or PK to refinery through road tanker. It was confirmed through interview and traceability report no non-certified material were delivered. Example, for traceability of a specific batch of RSPO certified CPO back to the supplying POM, Tennamaram POM kept the relevant documents such as the weighbridge ticket, CPO dispatch note, Dispatch oil quality ticket, Authorization from transporter, Borang MPOB L3, CPO dispatch authorization.
D.6.2	The objective is for 100 % segregated material to be reached.	Tennamaram POM does not accept any non-certified FFB. It was confirmed through summary of weighbridge ticket. Therefore CPO and PK can be considered 100% segregated.

Attachment 6

VERIFICATION OF NON-CONFORMITIES DURING LAST SURVEILLANCE ASSESMENT AT SOU 6 TENNAMARAM

No.	NCR No. & Indicator	Specification Major/Minor	Non-conformances	Corrective Action	Status & Verification by Assessor
1	HO-01 2016 6.9.1	Major	Interview with women employees of Tennamaram's division (previously Elmina Estate) learnt that there were no programmes (including Gender Meeting) conducted (for about two years) to address particular issued faced by women there, if any.	Gender Committee in Tennamaram, Elmina Division (previously Elmina Estate) had been re-activated and meeting was conducted on 6/1/17.	Verification: Auditor has verify the records that Gender committee in Elmina Division has been re activated, auditor also verify the meeting dated 6/1/17, no issue has been raised, only appointment of member and Policy training has been discussed, sighted also The Gender has Plan the meeting for next on January 2018 Status: Closed.
2.	MZK-01 2016 2.2.2	Minor	Physical markers along the legal boundaries between Tennamaram Estate (Hopeful Division) and Janda Forest Reserve was not available and maintained.	Tennamaram Estate will ensure the physical marker (boundary stone) will be clearly visible and maintained.	Verification: Auditor had visited the boundaries of fields 2014A and 2014B on Tennamaram Estate, fields and fields P90M-1, P 11A-1 and P95M -4 on Bukit Talang Estate. During site visit, auditor sighted that physical markers along the legal boundaries between Tennamaram Estate (Hopeful Division) and Janda Forest Reserve was visibly available. Status: Closed
3	RR-01 2016 4.6.11	Major	At Sungai Buloh Estate medical surveillance for exposure to manganese for foreman was not perform according to regulation 26(2) of USECHH, employee exposed to schedule II chemicals shall repeat at least once in six months as determined by the assessor.	The estate management will ensure the related workers (foremen) will sent for annual medical surveillance as per recommendation made by CHRA assessor.	Verification: Auditor has verify records foreman at Sungai Buloh Estate for annual medical surveillance as per recommendation made by CHRA assessor last conduct was on 19/9/17. The results confirmed that there was no evidence of toxicity both clinical and biochemically in all the workers tested including foreman Status: Closed
4	RR-02 2016 4.7.5	Minor	At Sugai Buloh Estate: First aid box was not maintain for future emergency use. No record of usage is available and the full list of the medicine also not available.	Estate management have conducted a First Aid Box Training for the year 2017. All boxes have been equipped with listed items as per requirement. The checklist and monitoring records also available.	Verification: First Aider Training has conducted on 19/8/17 (Tennamaram), 21/11/17 (Bukit Talang) and 28/11/17 (POM) by the Hospital Assistant (HA) to all holders of First Aid Box, the training records were reviewed. The following First Aid Box in the all respective station were inspected by the HA. Status: Closed

5	STK- 012016 4.1.2.	Minor	At Sungai Buloh Estate Water from washing of agrochemical containers, PPE and spraying equipment, spillage during chemical mixing and emergency shower was directed into a field. At Tennamaram Estate Water from emergency shower was directed into the field.	Estate management will ensure to reuse the contaminated water and ensure it does not being channel directly to the field. Sump have been built to contaminate the residues from eye wash / emergency wash	Verification: The practice of reusing all water from washing of agrochemical containers, PPE and spraying equipment, spillage during chemical mixing and emergency showers was now observed to be reused at all Estate under SOU Tennamaram. Status: Closed
6	STK-02 2016 4.4.2.	Major	Sungai Buloh Estate In 2016, water was sampled only twice at 1 point (1998S1) and twice at another point (2010D) instead of 4 times at each point.	Sungai Buloh Estate has reviewed the sampling points and monitoring schedule format will be done according to the requirement. Latest sampling had been carried out on 5 th January 2017.	Verification: Auditor has verify at Sungai Buloh Estate sampling points and monitoring schedule format which has been done according to the requirement. Sighted also the Latest sampling had been carried out on November 2017. Status: Closed
7	STK-03 2016 4.7.3	Major	Sungai Buloh Estate – Workers carrying out circle spraying in 2014A and P&D spraying in Field 15C were not using goggles.	Estate management have already conducted a refresher training to all sprayers on PPE usage inclusive of goggles during spraying work. PPE records book and PPE daily checklist also have been maintained by estate management.	Verification: At Tennamaram and Bukit Talang Estates, auditor has visited all the work operation noted that sprayers were fully equipped with mask, rubber gloves, rubber boots & apron. Along the journey inside the field drivers and harvesters were observed to be in safety helmets and their sickle, harvesting knife covered with the approved type. Auditor also verify the PPE issuance book and recorded all PPE has been given and replaced according. Trainings were provided during musters and also in session held in the estate community hall. Status: Closed.

Attachment 7

<u>Time bound plan – Sime Darby Plantation Berhad</u>

SDP - RSPO Certification Status for Malaysia Operations

SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug 10	11 Aug 20	SPO 550179	
2	Chersonese	Kuala Kurau, Perak	5 Oct 11	4 Oct 21	CU-RSPO-815148, RSPO 590800	
3	Elphil	Sg Siput, Perak	18 Jun 11	17 Jun 21	RSPO 550180	
4	Flemington	Teluk Intan, Perak	5 Oct 11	4 Oct 21	CU-RSPO-819144, RSPO 590802	
5	Seri Intan	Teluk Intan, Perak	3 Mar 11	2 Mar 21	CU-RSPO-811218, RSPO 0015	
5	Selaba	Teluk Intan, Perak	3 Mar 11	2 Mar 21	CU-RSPO-819142, RSPO 0016	
5a	Sg Samak	NA	3 Mar 11	NA	NA	
6	Tennamaram	Bestari Jaya, Selangor	3 Mar 11	2 Mar 21	CU-RSPO-819143, RSPO 0014	
7	Bkt Kerayong	Kapar, Selangor	15 Apr 11	14 Apr 21	RSPO 550181	
8	East	Carey Island, Selangor	19 May 10	18 May 20	SPO 543543	
9	West	Carey Island, Selangor	19 May 10	18 May 20	SPO 543594	
9a	Sepang	Sepang, Selangor	19 May 10	NA	NA	

10	Bukit Puteri	Raub, Pahang	7 Jul 11	6 Jul 21	CU-RSPO-815147, 18502206 001, 824 502 14020	
11	Kerdau	Temerloh, Pahang	7 Jul 11	6 Jul 21	CU-RSPO-819155, 18502207 001, 824 502 14019	
12	Jabor	Kuantan, Pahang	7 Jul 11	6 Jul 21	CU-RSPO-819156, RSPO 928288, 824 502 16049	
13	Labu	Nilai, Negeri Sembilan	30 Dec 11	29 Dec 21	CU-RSPO-819163, SGSRSPO/PM/MY13/01284, 824 502 16039, SGS- RSPO/PC1700004	
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May 10	18 May 20	SPO 541905	
15	Sua Betong	Port Dickson, Negeri Sembilan	18 Feb 14	17 Feb 19	SGS-RSPOPM-MY14/01364, 824 502 16032	Sua Betong Oil Mill has been comissioned to replace Rantau Oil Mill with Certificate No: CU- RSPO-819165, certification date: 30 Dec 2011.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul 11	6 Jul 21	CU-RSPO-819157, RSPO 928188, 824 502 16051	
17	Kempas	Jasin, Melaka	19 May 10	18 May 20	RSPO 005	
18	Diamond Jubilee	Jasin, Melaka	5 Oct 11	4 Oct 21	CU-RSPO-819146, RSPO 591224	
19	Pagoh	Muar, Johor	28 Jan 14	27 Jan 19	RSPO 600305	Pagoh Oil Mill has been commisioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.
19a	Yong Peng	Yong Peng, Johor	20 Oct 10	19 Oct 15	RSPO 550182	
20	Chaah	Chaah, Johor	18 Nov 10	17 Nov 20	RSPO 548299	
21	Gunung Mas	Kluang, Johor	19 May 10	18 May 20	RSPO 901888	

22	Bukit Benut	Kluang, Johor	5 Oct 11	4 Oct 21	CU-RSPO-819147, RSPO 591229	
23	Ulu Remis	Layang-layang, Johor	11 Apr 11	10 Apr 21	SGS-RSPO/PM-00722, 824 502 16042	
24	Hadapan	Layang-layang, Johor	29 Mar 11	28 Mar 21	SGS-RSPO/PM-00715, 824 502 16040, BVC- RSPO20170623-01	
25	Segaliud	Sandakan, Sabah	20 May 10	19 May 15	RSPO 547123	
26	Sandakan Bay	Sandakan, Sabah	1 Oct 08	30 Sep 18	RSPO 537872	
27	Melalap	Tenom, Sabah	21 Jan 11	20 Jan 21	RSPO 547124	

SDP- RSPO Certification Status for Indonesia Operations

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	MUTU-RSPO/011, SGS- RSPO/PC17-00005, SGS- RSPO/PC17-00005	
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	3-Jul-18	MUTU-RSPO/027	
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	16-Mar-17	MUTU-RSPO/014	Recertification of Bebunga POM is in progress.

6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	
7	PT BAHARI GEMBIRA RIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	9-Jul-17	MUTU-RSPO/019	
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	24-Nov-20	MUTU-RSPO/002	
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	16-Mar-17	MUTU-RSPO/016	Recertification of Pondok Labu POM is in progress.
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	16-Mar-17	MUTU-RSPO/017	Recertification of Rantau Panjang POM is in progress.
12 13	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11 1-April-14	05-Feb-22 1-April-19	MUTU-RSPO/009 MUTU-RSPO/035	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	MUTU-RSPO/001	
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	16-Mar-17	MUTU-RSPO/015	Recertification of Selabak POM is in progress.
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	11-Sep-17	MUTU-RSPO/020	

17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU-RSPO/004	
18 19	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU MANDAH	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16 1 April 2014	30-Nov-21 1 April 2019	MUTU-RSPO/008 MUTU-RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU-RSPO/007	
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	10-Jul-17	MUTU-RSPO/018	
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	3-May-18	MUTU-RSPO/026	
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-19	MUTU-RSPO/044	
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	NA	NA	