

**RSPO PRINCIPLE AND CRITERIA
4th Annual Surveillance Assessment (ASA4)
Public Summary Report**

TDM Plantation Sdn Bhd
Head Office: Level 3, Bangunan UMNO Terengganu Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu Terengganu, Malaysia
Kemaman Palm Oil Mill KM 121, Jerangau – Jabor Highway 24101 Kemaman Terengganu, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0095-11-000-00	Date	Member since: 28 February 2011
Company Name	TDM Plantation Sdn Bhd		
Address	Aras 1-5, Bangunan UMNO Terengganu, Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu, Terengganu, Malaysia Certification unit : Kemaman Palm Oil Mill, KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia		
Subsidiary of (if applicable)	-		
Contact Name	Mr Shahbudin Bin Usop		
Website	www.tdmberhad.com.my	E-mail	kpom.tdmp@tdmberhad.com.my
Telephone	09 822 6566	Facsimile	09 8226704

2. Certification Information			
Certificate Number	RSPO 587626	Certificate Issued Date	01/11/2013
		Expiry Date	31/10/2018
Scope of Certification	Palm Oil and Palm Kernel Production from Kemaman Palm Oil Mill and Supply Base (Tebak, Pelantoh, Jernih, Air Putih, Gajah Mati & MAIDAM Estate)		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
CoP/MF/0009-1	Code of Good Manufacturing Practice (CoGMP)	MPOB	18/03/2018

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3. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS	
		Longitude	Latitude
Kemaman Palm Oil Mill	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia	103° 14' 52.8"	4° 24' 10.80"
Tebak Estate	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia	103° 13' 35.4"	4° 25' 48.61"
Pelantoh Estate	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia	103° 14' 59.64"	4° 24' 19.23"
Jernih Estate	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia	103° 12' 39.59"	4° 26' 24"
Air Putih Estate	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia	103° 7' 47.99"	4° 8' 23.99"
Gajah Mati Estate	Bukit Besi, 23000 Dungun, Terengganu	103° 12' 23.30"	4° 41' 45.05"
MAIDAM Estate	Bukit Besi, 23000 Dungun, Terengganu	103° 12' 24.42"	4° 37' 39.58"

4. Description of Supply Base							
Estate	Mature (ha)	Immature (ha)	Infras & Other (ha)	HCV (ha)	Total Planted (ha)	Total Hectarage	% of Planted
Jernih Estate	2,416.67	405.40	260.90	65.46	2,822.07	3,148.43	89.63
Tebak Estate	2,357.94	327.92	340.84	30.03	2,685.86	3,056.73	88.74
Pelantoh Estate	3,003.78	138.20	149.62	-	3,141.98	3,291.60	95.45
Air Putih Estate	3,035.89	1,006.81	121.58	187.7	4,042.70	4,351.98	93.00
MAIDAM Estate	500.16	Replanting 2017- 255.80	151.38	-	755.96	907.34	83.00
Gajah Mati Estate	2,063.53	1,457.34	302.38	59.53	3,520.87	3,882.78	90.68
Total	13,377.97	3,591.47	1,326.70	342.72	16,969.44	18,638.86	

Remarks:

- i) **Jernih Estate: Total planted area decrease of 7.65 ha compared to last year report due to resurvey by Agronomist TDMP.**
- ii) **Tebak Estate: The total HCV is 30.03 ha compared to last year. The total hectare in Y2016 was wrongly input.**
- iii) **Pelantoh Estate: Decrease of total planted area 14.51 ha due to remove of unproductive area.**
- iv) **Air Putih Estate: The total planted area increase of 1.02 ha due to resurvey done by Agronomist prior to replanting of block 16A. Besides, the total HCV area and total hectare was different due to wrongly input of data because did not insert the unplanted area hectares.**
- v) **Gajah Mati Estate: Increase of total planted and total hectare due to Aeromap land survey report which done on November 2016.**

Note: Infras = infrastructure

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5. Plantings & Cycle								
Estate	Age (Years)					Tonnage / Year		
	0 - 3*	4 - 10*	11 - 20	21 - 25	26 - 30	Estimated (ASA4) Sept 16 – Aug 17	Actual (ASA4) Sept 16 – Aug 17	Forecast (RC) Sept 17 – Aug 18
Jernih Estate	405.40	-	1,955.23	461.44	-	47,000.00	39,098.62	42,300.00
Tebak Estate	327.92	87.39	-	227.29	2,043.26	48,900.00	44,900.69	51,430.00
Pelantoh Estate	138.20	-	-	2,139.71	864.07	56,600.00	50,712.69	54,000.00
Air Putih Estate	1,006.81	1,510.92	-	890.51	634.46	38,000.00	31,490.68	35,450.00
MAIDAM Estate	255.8	-	-	500.16	-	6,420.00	4,861.09	6,780.00
Gajah Mati Estate	1457.34	687.60	352.21	1,023.72	-	30,320.00	23,744.06	31,300.00
Total						227,240.00	194,807.83	221,260.00

6. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (ASA4) Sept 16 – Aug 17	Actual (ASA4) Sept 16 – Aug 17	Forecast (RC) Sept 17 – Aug 18
Jernih Estate	47,000.00	39,098.62	42,300.00
Tebak Estate	48,900.00	44,900.69	51,430.00
Pelantoh Estate	56,600.00	50,712.69	54,000.00
Air Putih Estate	38,000.00	31,490.68	35,450.00
MAIDAM Estate	6,420.00	4,861.09	6,780.00
Gajah Mati Estate	30,320.00	23,744.06	31,300.00
Total	227,240.00	194,807.83	221,260.00

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7. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (ASA4) Sept 16 – Aug 17	Actual (ASA4) Sept 16 – Aug 17	Forecast (RC) Sept 17 – Aug 18
N.A	NIL	NIL	NIL

8. Certified Tonnage									
Mill	Estimated (ASA4) Sept 16 – Aug 17			Actual (ASA4) Sept 16 – Aug 17			Forecast (RC) Sept 17 – Aug 18		
	FFB	CPO OER %	PK KER %	FFB	CPO OER %	PK KER %	FFB	CPO OER %	PK KER %
Kemaman Palm Oil Mill	227,240.00	45,960.00 20.23%	12,331.00 5.43%	194,807.83	44,255.88 22.72%	11,793.10 6.05%	221,260.00	45,358.30 20.5%	11,063.00 5.00%

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: RSPO-ACC-19)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
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BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (RSPO-ACC-19) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia. BSI is accredited for RSPO Supply Chain Certification Systems (SCCS) and Principles & Criteria for Sustainable Palm Oil Production (P&C, Single Site & Group) certification Worldwide.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 1-3 August 2017. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates (Air Putih & MAIDAM Estate). A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2013 (RSPO P&C MYNI-2014) and RSPO Supply Chain Certification Standard 2014 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base. The estates sample were determined based on formula $N = 0.8\sqrt{y}$ where y is the number of estates while when applicable, the smallholders sample were determined following the RSPO Certification Requirement for Group Certification Standard 2016. The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix E.

All the previous nonconformities are remains closed. The assessment findings for the 4th Annual Surveillance Assessment are detailed in Section 3.3.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

This report was externally reviewed by RSP0 approved Certification Reviewer prior to certification decision by BSI.

The following table would be used to identify the locations to be audited each year in the 5 year cycle

1. Assessment Program					
Name (Mill / Supply Base)	Initial Certification (2013)	ASA1 (2014)	ASA2 (2015)	ASA3 (2016)	ASA4 (2017)
Kemaman Palm Oil Mill	√	√	√	√	√
Tebak Estate			√		
Pelantoh Estate			√		
Jernih Estate	√			√	
Air Putih Estate		√			√
Gajah Mati Estate	√			√	
MAIDAM Estate		√			√

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Tentative Date of Next Visit: August 7, 2018 – August 9, 2018

Total No. of Mandays: 9 mandays

BSI Assessment Team:

Hoo Boon Han – Lead Auditor

He holds Master of Technology (Environmental Management) from the University Malaya and Bachelor of Science Forestry (Hons) Majored in International Tropical Forestry from University Malaysia Sabah. He has more than 3 years working experience in environmental monitoring & audit, carbon accounting & reduction, wastewater treatment, waste management and sustainable development. He has successfully completed the RSPO Lead Auditor and RSPO Supply Chain Training in April 2012. He has been involved in RSPO P&C audit in Indonesia and Malaysia as well as RSPO SC audit across different region including Asia, Europe and North America for the past 4 years. During this assessment, he assessed on the aspect of environment, Safety and Health, Legal, social and community engagements, stakeholders consultation, and workers welfare. He is able to speak and understand Bahasa Malaysia, English and Mandarin.

Hu Ning Shing- Team Member

She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in his previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages.

Isman Bin Yusoff-Team Member

He holds Executive MBA from University Technology Mara and a degree in Electrical Engineering from University of Missouri, USA. He worked as an ISO 9001 Lead Auditor with SIRIM and as an ISO 9001, ISO 14001 and OHSAS 18001 Lead Auditor with Det Norske Veritas (DNV) for the past 6 years. He is also experience in Bio Mass CDM Projects. Currently he is a Lead Auditor with BSI for ISO 9001, ISO 14001 and OHSAS 18001. Isman Yusoff attended RSPO internal training on September 2012. He attended RSPO Certification Body workshop on October 2011, February 2012, June 2012 and Supply Chain Training organised by RSPO Secretariat on February 2012. He has involved in auditing palm oil mills as well as wood industries. He has been involved in RSPO assessment since September 2012 as a team member covering assessment with RSPO P&C in Malaysia. During this assessment, he assessed on the aspect of legal, environment, safety and health and mill best practices.

Accompanying Persons: -

Section 3: Assessment Findings

3.1 Details of audit results

This assessment has been assessed using the following RSPO normative requirements. The assessment details are provided in Appendix A.

- TDM Plantations Sdn Bhd Time Bound Plan
- RSPO P&C MY-NIWG 2014 Checklist
- RSPO Supply Chain Certification Checklist November 2014

3.2 Progress against Time Bound Plan

TDM Plantation owns two palm oil mills (certification units) located in Kemaman District and Terengganu District, State of Terengganu, Peninsular Malaysia. TDM Plantation has achieved RSPO Certification for the two certification units in 2013. TDM Plantation Sdn Bhd has completed its time bound plan to certify both certification units that exist during this assessment. The time bound plan for the existing mills has been completed.

TDM plantation Sdn Bhd does not manage PT Rafi Kamajaya Abadi (PT Rafi). PT Rafi is independently managed by its own management team. Therefore, the RSPO certification of TDM Plantation Sdn Bhd is to exclude PT Rafi from the assessment process, as it is independently managed from TDM Plantation Sdn Bhd.

Time Bound Plan		
Requirement	Remarks	Compliance
Summary of the Time Bound Plan		
Does the plan include all subsidiaries, estates and mills?	The time bound plan includes all operating units in Malaysia.	Yes
Is the time bound plan challenging? <ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. 	The TBP is challenging due to the increasing regulations in the local laws including the current focus of the company's management to implement MSPO which is a mandatory requirement. The company is also expanding the land areas with new acquisitions.	Yes
Have there been any changes since the last audit? Are they justified?	The changes are due to new acquisitions of lands by the management.	Yes
If there have been changes, what circumstances have occurred?	Delays in certification of some POMs and estates.	Yes
Have there been any stakeholder comments?	To-date, no comments received from stakeholders on the TBP.	Yes
Have there been any newly acquired subsidiaries?	No	Yes

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Have there been any isolated lapses in implementation of the plan?	No lapses however re-scheduling of the certification dates has been made.	Yes
Un-Certified Units or Holdings		
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Yes the company do conduct internal audit but no uncertified units.	Yes
No replacement after dates defined in NIS Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	HCV Assessments and SEIA have been conducted for all operating units including newly acquired areas. HCV and SEIA management and monitoring plans are also implemented in accordance with the consultant's recommendations.	Yes
Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	Any new NPP will be submitted but for this year the NPP for Pelung Estate is still in progress.	Yes
Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	There's no land conflicts reported against the company.	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	To-date, no complaints on labour disputes received by the company.	Yes
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Yes	Yes
Any Legal non- compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	None so far. No stakeholder comments or complaints received.	Yes

3.3 Details of findings

The nonconformity is listed below. The summary report of the assessment by criteria is listed in Appendix A.

During the 4th Annual Surveillance Assessment there were two (2) Major & one (1) Minor nonconformities raised. The Kemaman Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for its effectiveness and closed accordingly.

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1510086-201707-M1	<p>Requirements Indicator 5.2.2 Where rare, threatened or endangered (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 a management plan.</p>	Major
	<p>Evidence of Nonconformity No HCV management plan available for Air Putih and MAIDAM estate although different type of wild life being sighted within the estate vicinity according to the animal sighting record and interview with the workers.</p>	
	<p>Statement of Nonconformity HCV management plan is not available in the estate</p>	
	<p>Corrective Action <u>Root Cause:</u> The document was already recorded based on Bio-Diversity Assessment (report November 2011). However the management did not include and implement the plan where monitoring of the document was insufficient.</p> <p><u>Correction:</u> The Management plan will be updated and distributed and implemented accordingly in all operating units.</p> <p><u>Corrective Action:</u> A monitoring form to monitor the RTE and the schedule to inspect the HCV area are available.</p> <p>Assessment team conclusion: An NCR close out assessment has been conducted to ensure the effectiveness of this closure.</p> <p>During the assessment, the assessment team had reviewed the management plan and confirmed it is as per the recommendation provided in the BioDiversity Report. The monitoring template developed by TDM is as per the management plan and is available at all sampled site - Gajah Mati Estate, Tebak Estate and MAIDAM Estate. The monitoring template has been in used and records are kept in each of the operating units.</p>	

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	<p>A flow process was also been developed for HCV monitoring. Interview was conducted with the Assistant manager and "Mandos" regarding the monitoring of RTE and it is according to the standard practice of TDM Plantations Sdn Bhd method.</p> <p>With the available inspection schedule, process flow and monitoring elements, the assessment team deemed that the certification holder can eliminate the root cause. The continuous implementation will be verified in the next assessment.</p>	
	<p>Assessment Conclusion: Therefore, the major NC was closed on 25/9/2017.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
<p>1510086-201707-M2</p>	<p>Requirements Indicator 5.1.1 An environmental impact assessment (EIA) shall be documented.</p> <p>Evidence of Nonconformity The facilities for vehicles at the MAIDAM Estate-Site office was lacking on the following: 1) There is no proper location for Tractor cleaning. And oil trap was not available. 2) The Oil Change /top up /Lubricating/small repair, and overnight parking for the vehicles without proper location.</p> <p>Statement of Nonconformity The vehicle maintenance activities were not documented in the Aspect/impact list identification and evaluation.</p> <p>Corrective Action <u>Root Cause:</u> No environmental impact assessment was conducted for outsourcing to third party to perform maintenance, service and cleaning or any related jobs.</p> <p><u>Correction:</u> An environmental aspect and impact assessment was completed for the onsite maintenance and crashing. A new workshop for the outsourcing has been constructed.</p> <p><u>Corrective Action:</u> The monitoring of any new activities which requires environmental aspect and impact assessment has been established.</p> <p>Assessment team conclusion: The onsite NCR close out assessment was conducted to verify on the correction taken by the certification holder.</p> <p>The environmental aspect and impact assessment and evaluation was reviewed by the assessment team prior the onsite NCR close out was deemed sufficient to address the NCR raised. During the onsite assessment, interviewed with the estates assistant manager</p>	<p>Major</p>

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	had confirmed their understanding if there are any new activities which may cause environmental impact will be registered and evaluated.	
	Assessment Conclusion: Therefore, the major NC was closed on 25/9/2017.	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1510086-201707-N1	Requirements Indicator 6.6.2 Minutes of meetings with main trade unions or workers representatives shall be documented.	Minor
	Evidence of Nonconformity Kemaman POM, Air Putih Estate and MAIDAM Estate: Meeting with main trade unions or workers representatives has yet to be conducted.	
	Statement of Nonconformity Meeting with main trade unions or workers representatives has yet to be conducted.	
	Corrective Action <u>Root Cause:</u> The meeting with main trade union/workers representative was done informally and not recorded <u>Correction:</u> The meeting with the union/workers representative was conducted on 13 August 2017. <u>Corrective Action:</u> Internal briefing was provided to all operating units that the meeting minutes with the union/workers representative including supporting document and photos shall be kept. The SIA will be updated against any issue raised.	
	Assessment Conclusion: The evidence will be verified in the next assessment.	

Observation	
OBS #	Description
1	-Nil-

Positive Findings	
PF #	Description
1	-Nil-

Issues raised by Stakeholders	
<p>Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Kemaman Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.</p> <p>Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. These have been incorporated into the assessment findings.</p> <p>Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix E.</p>	
IS #	Description
1	<p>Issues: Contractors – He informed that the payments were made promptly without any delay. Contract agreement were signed prior commencement of work.</p> <p>Management Responses: The management will ensure the payment was made according to the terms.</p> <p>Audit Team Findings: No further issue.</p>
2	<p>Issues: Headmaster from SK. Padang Kubu – The management has provided assistance such as provided transportation to send students for competition outside the compound and etc. Good relationship with the management.</p> <p>Management Responses: The management will continue to support and provide assistance when deem necessary.</p> <p>Audit Team Findings: No other issue.</p>
3	<p>Issues: NUPW Representatives – They informed that some Mill Operators have been transferred from mill to Bio Organic Fertilizer factory and therefore the operator's allowance was not entitled to them anymore.</p> <p>Management Responses: The management has informed that the mill has upgraded to continuous sterilization that caused excessive of workers. Therefore, the relevant station's workers have been transferred to Bio-Organic Fertilizer factory which has not been commissioned yet. The workers are working as general workers in the BOF plant. The management have consulted MAPA/NUPW prior the cancellation of allowance. According to MAPA/NUPW, they are not entitled with the allowance due to the job nature.</p> <p>Audit Team Findings: Verified the MAPA/ NUPW agreement confirmed that the workers are not entitled with allowance until the factory has commission the operation.</p>
4	<p>Issues: Head of Village, Kg. Padang Kubu – He informed that no encroachment of land from the management. Good relationship was maintained with the management.</p> <p>Management Responses: The management will continue to ensure no encroachment of land into local communities' land.</p>

	<p>Audit Team Findings: No other issue.</p>
5	<p>Issues: Workers’ Representative (Bangladeshi and Indonesian) – They have been treated equally without any discrimination. Their salary was according to Minimum Wage Order 2016. Free housing was provided to them with subsidized of water and electricity.</p> <p>Management Responses: The management will continue to treat all the workers equally and comply with the regulations.</p> <p>Audit Team Findings: No further issue.</p>

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1382083M1	<p>Requirements Indicator : 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 timetabled, including responsibilities for implementation.</p> <p>Evidence of Nonconformity Kemaman POM: The management has generated an action plan and reviewed as necessary. However, the management did not capture the issues raised by stakeholders during stakeholder meeting into the plan where monitoring of the issues was insufficient.</p> <p>Statement of Nonconformity Issues raised by stakeholders were not captured into the plan.</p> <p>Corrective Action The SIA plan will be updated by each SOU accordingly especially KPOM SOU. The updated SIA plan for each issues raised in the stakeholder meeting was verified. The Major nonconformity was closed on 27/10/2016</p> <p>Assessment Conclusion: The mill has developed SIA Action Plan for Y2017 which covered the social profile such as safety & health, education, housing & infrastructure and etc. The plan was developed through the issues raised during SIA and stakeholder meetings. The plan has incorporated the specific time frame with the person in charge to solve the issue. The SIA plan was updated by each SOU accordingly The updated SIA plan for each issues raised in the stakeholder meeting was verified. The corrective action was implemented effectively and therefore, the Major NC raised last assessment was remain closed.</p>	Major

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1382083M2	<p>Requirements Indicator : 6.5.2 Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>Evidence of Nonconformity Kemaman POM: Employment letters were not revised where the pay per day was RM34.62. Sampled employment letters as below: a) Employee No.: KM1400199 b) Employee No.: KM1200180 Jernih Estate: Sampled contracts below were not revised according to Minimum Wage Order 2016 where salary was RM 900 under Section 6: a) Employee No.: JN1400658 b) Employee No.: JN00203 Gajah Mati Estate: There were few workers' contracts having different public holiday entitlement under Section 7 (c). Two sampled workers were entitled for 10 days for the first year of service whereas others was 13 days. Sampled workers as below: a) Employee No.: GM0901424 b) Employee No.: GM0901471</p> <p>Statement of Nonconformity Worker's contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) were not effectively managed.</p> <p>Corrective Action The employment letters and worker's contracts will be updated accordingly and submitted to ALL workers. They will place their signature on the contracts as a proof of acceptance. The issue is only on documentation side since all payment of the wages were done according to the latest labour law and union agreement. Regarding the case at Gajah Mati Estate, the difference in entitlement of public holiday was caused by the sampled old contract was compared with the new contract. The updated employment letters and contracts will be provided to ALL workers. The copy of the sampled contracts and employment letters was sighted. The Major nonconformity was closed on 27/10/2016</p> <p>Assessment Conclusion: The mill has issued revised employment letters to the workers and the salary terms were according to MAPA/NUPW agreement. Sampled of workers as below:</p>	Major

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	<p>a. Employee No.: KM1400199 b. Employee No.: KM1200180 c. Employee No.: KM1100167 d. Employee No.: KM1200175</p> <p>Seen the revised employment contracts for Jernih Estate under Clause 6 Salary and Allowance where the minimum wage was according to MAPA/NUPW agreement. Sampled contracts as below: a. Employee No.: JN00203 b. Employee No.: JN1400658</p> <p>The revised employment contracts have been verified for sampled workers in Gajah Mati Estate where the public holiday entitlement was 13 days as stated in Clause 7 (c). Sampled contracts as below: a. Passport No.: A 3906350 b. Passport No.: AR 534507</p> <p>The corrective action was implemented effectively and therefore, the Major NC raised last assessment was remain closed.</p>	
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Non-Conformity		
NCR #	Description	Category (Major / Minor)
1382083N1	<p>Requirements Indicator : 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.</p> <p>Evidence of Nonconformity Gajah Mati Estate: The last review of management action plan was conducted on year 2011.</p> <p>Statement of Nonconformity Management action plan to mitigate the negative impacts and promote the positive ones was not reviewed since year 2011.</p> <p>Corrective Action The management action plan will be reviewed and updated accordingly. The updated management action plan will be available for the auditors to check at the SOU 30 days from the audit date.</p> <p>Assessment Conclusion: Management Plan & Progress on Social Impact Assessment dated 23/1/2017 was developed to monitor the progress of issues raised during SIA and stakeholder meetings. The plan has incorporated person in charge with expected completion date. For eg: Tuition class for workers' children where the stakeholders requested the management to provide transport to send the children to attend tuition class. The management has provided van to the children during tuition class. Interviewed with the workers confirmed that van was provided. Therefore, the Minor NC raised during last assessment was verified and closed effectively on 3/8/2017.</p>	Minor

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1382083N2	Requirements Indicator : 6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.	Minor
	Evidence of Nonconformity Gajah Mati and Jernih Estate: Government agencies such as TNB, Syarikat Air Terengganu, MAPA, Labour Office, DOSH, MPOB and etc were not included into the list.	
	Statement of Nonconformity Stakeholder list was incomplete.	
	Corrective Action The stakeholder list will be updated accordingly and kept at each SOU. A master list of all stakeholder will be kept at KPOM CU for reference. The updated list of stakeholders will be available at the affected CU 20 days from the audit date.	
	Assessment Conclusion: Seen the stakeholder list 2016 for Jernih Estate and stakeholder list 2017 for Gajah Mati Estate. All the relevant stakeholders were included into the list such as TNB, SAT, MAPA, Labour Department and etc. Therefore, the Minor NC raised during last assessment was verified and closed effectively on 3/8/2017.	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1382083N3	Requirements Indicator : 6.4.2 A procedure for calculating and distributing fair compensation (monetary or otherwise) 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
	Evidence of Nonconformity Gajah Mati and Jernih Estate: Procedure for calculating and distributing fair compensation was not established and implemented.	
	Statement of Nonconformity Procedure for calculating and distributing fair compensation was not available.	

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	<p>Corrective Action The procedure will be established and implemented, monitored and evaluated accordingly. Also, all corrective actions taken as a result of the evaluation on the procedure will be recorded accordingly. The SOP will be established by TDM headquarter and kept at all SOU including North Zone SOU 60 days from the audit date.</p>	
	<p>Assessment Conclusion: SOP of Calculating and Distributing Fair Compensation, Doc. No.: TDMP/SOP-ESTATE/01, Rev No.: SOP ESTATES/REV 00, Effective Date: 1/1/2017 was established by the Head Office. The objectives of the procedure is to provide guideline to SOU on how to compensate any land disputes and ensure proper practices of compensation. The compensation can be settled by mutual agreement od refer to District Land Department to value the land on dispute. Therefore, the Minor NC raised during last assessment was verified and closed effectively on 3/8/2017.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1382083N4	<p>Requirements Indicator : 6.5.3 Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p>Evidence of Nonconformity Kemaman POM: The following issues were noted during site visit at the workers' quarters: a) Drainage was blocked with rubbish at house no. 319 and 320. b) Apron for manuring was brought back to the linesite at house no. 320. c) Rubbish was scattered outside the dustbin provided. d) Floor cracking outside the houses. e) Chemical drums were found at the linesite house no. 371. f) 12 LPG cylinders were found selling at the linesite.</p> <p>Gajah Mati Estate: Staircase of house no. GM 482-104 was broken.</p> <p>Statement of Nonconformity The conditions of the housing area were not satisfied.</p>	Minor

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	<p>Corrective Action All the issues raised will be rectified before the next audit accordingly.</p> <ul style="list-style-type: none"> a) The drain will be repaired and cleaned accordingly. b) The manuring apron will not be allowed to be brought back home for washing but will be washed at the worksite instead. c) This is a problem of the worker's attitude towards cleanliness. As far as 6th October 2016, 2 warning letters have been issued to the said worker. However, another letter of warning will be issued to the worker for the cleanliness negligence problem. d) The cracked floor will be repaired accordingly. e) A warning letter has been issued to the said worker. f) The workers have been warned not to sell LPG at the linesite without proper storage area. g) The broken staircase at Gajah Mati Estate will be repaired accordingly. <p>Will completed 60 days from the audit date.</p>	
	<p>Assessment Conclusion Site verification was conducted at Kemaman POM. During linesite visit, it was found that the drain was clean and clear. No rubbish was scattered around the compound. Chemical drums and apron was not kept in the linesite area by the workers. Warning letter to the respective owners were sighted. Therefore, the Minor NC raised during last assessment was verified and closed effectively on 3/8/2017.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1382083N5	<p>Requirements Indicator : 4.5.2 Training of those involved in IPM implementation shall be demonstrated.</p>	Minor
	<p>Evidence of Nonconformity Gajah Mati Estate: IPM training was not conducted in 2015 and 2016.</p>	
	<p>Statement of Nonconformity The evidence of the IPM training was not available at Gajah Mati Estate.</p>	
	<p>Corrective Action The training will be conducted annually at all estates and recorded accordingly. The main objective of the company is to conduct the training centralized by SOUs. The training attendance list and report will be available at Gajah Mati Estate 60 days from the audit date.</p>	
	<p>Assessment Conclusion Accepted, the effectiveness of the corrective action will be verified during the next assessment.</p> <p>ASA4: For Gajah Mati, verified the IPM training attendance list and report has been done. Total 2 training conducted on 29 September 2016 for workers and 24 October 2016.</p> <p>In Air Putih Estate, training records for staff on IPM implementation were available and verified to be satisfactory during on-site assessment. The training on barn owl,</p>	

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	<p>parasite and cover crop conducted on 21 Jun 2017. In MAIDAM estate, the training for the beneficial plant conducted to the workers on 14 June 2017.</p> <p>Thus, the Minor NC was closed on 3/8/2017.</p>	
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Non-Conformity		
NCR #	Description	Category (Major / Minor)
1382083N6	<p>Requirements Indicator : 4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate.</p> <p>Evidence of Nonconformity Performance monitoring for air pollution control system as per Compliance Schedule, JPKKS 004055 was not available.</p> <p>Statement of Nonconformity Records of monitoring were not effectively maintained.</p> <p>Corrective Action Records of monitoring and any actions taken will be maintained and available, as appropriate.</p> <p>The records was already recorded daily at the boilers but not in a proper form provided by the Department Of Environment. However, after this the boilerman will record the performance monitoring data for air pollution control system in the form provided by DOE. The data record will be available at the mill office 10 days from the audit date.</p> <p>Assessment Conclusion ASSA4: The records- Performance monitoring data/activities of cyclones data on Pressure, Stack Condition and Discharge Hopper condition were monitored hourly by boiler man. Records 31 Jan 2017 to 1 June 2017 sighted. Thus, the Minor NC was closed on 3/8/2017.</p>	Minor

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1382083N7	<p>Requirements Indicator : 5.1.3 This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p>	Minor

	<p>Evidence of Nonconformity Monitoring protocol and mitigation measures plan to be updated and in-line with new Compliance Schedule, JPKKS 004055 in compliance with new Environment Quality, Clean Air Regulation 2014 related to:</p> <ul style="list-style-type: none"> i) Particulate and smoke emission from boiler ii) Noise emission iii) GHG emission 	
	<p>Statement of Nonconformity Monitoring protocol and mitigation measures plan was not effectively reviewed.</p>	
	<p>Corrective Action All these mitigation measures and monitoring protocol will be captured in the continuous improvement plan and pollution prevention plan. These will be reviewed annually to monitor their effectiveness of the mitigation measures. The documentation will be available at the mill office, 30 days from the audit date.</p>	
	<p>Assessment Conclusion ASA4: Noise emission- Additional noise exposure monitoring reports dated 3 October 2016. Audiometric test reports dated 22-23 Feb 2017. Positive noise monitoring done on 3 Nov 2012 with noise mapping.</p> <p>To ensure boiler dust concentration comply with the stipulate limit of 0.4 gm/Nm³ as stipulated in the Environmental Quality (Clean Air) Regulations, 1978. The monitoring conducted every 6 monthly by Environmental Science (M) Sdn Bhd. Result as below:</p> <ul style="list-style-type: none"> a) Stack Flue Gas of Boiler No. 2 dated 15 June 2017; Result: 0.2251 at 12 % CO₂ b) Stack Flue Gas of Boiler No. 1 dated 29 Dec 2016; Result: 0.3613 at 12 % CO₂ <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 is used and the management opted for full version was applied. Thus, the Minor NC was closed on 3/8/2017.</p>	

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3.3.2 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
A819714/1M	Major	6/12/2012	Closed on 30/5/2013
A819714/1N	Minor	6/12/2012	Closed on 8/9/2014
A819714/2N	Minor	6/12/2012	Closed on 8/9/2014
1097194M1	Major	11/9/2014	Closed on 16/10/2014
1097194M2	Major	11/9/2014	Closed on 16/10/2014
1097194M3	Major	11/9/2014	Closed on 16/10/2014
1097194N1	Minor	11/9/2014	Closed on 8/9/2015
1097194N2	Minor	11/9/2014	Closed on 8/9/2015
1097194N3	Minor	11/9/2014	Closed on 8/9/2015
1097194N4	Minor	11/9/2014	Closed on 8/9/2015
1235579M1	Major	9/9/2015	Closed on 8/10/2015
1235579M2	Major	9/9/2015	Closed on 8/10/2015
1235579M3	Major	9/9/2015	Closed on 13/10/2015
1235579N1	Minor	9/9/2015	Closed on 29/9/2016
1382083M1	Major	29/9/2016	Closed on 27/10/2016
1382083M2	Major	29/9/2016	Closed on 27/10/2016
1382083N1	Minor	29/9/2016	Closed on 03/08/2017
1382083N2	Minor	29/9/2016	Closed on 03/08/2017
1382083N3	Minor	29/9/2016	Closed on 03/08/2017
1382083N4	Minor	29/9/2016	Closed on 03/08/2017
1382083N5	Minor	29/9/2016	Closed on 03/08/2017
1382083N6	Minor	29/9/2016	Closed on 03/08/2017
1382083N7	Minor	29/9/2016	Closed on 03/08/2017
1510086-201707-M1	Major	03/08/2017	Closed on 25/9/2017
1510086-201707-M2	Major	03/08/2017	Closed on 25/9/2017
1510086-201707-N1	Minor	03/08/2017	"Open"

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Assessment Conclusion and Recommendation:

<p>Based on the findings during the assessment Kemaman Palm Oil Mill Certification Unit and supply base complies with the RSPO P&C 2013 (MY-NI 2014), and the RSPO Supply Chain Certification Standard (Nov 2014) for CPO Mill. It is recommended that the certification of Kemaman Palm Oil Mill certification Unit is approved and continued.</p>	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Mr Shahbudin Bin Usop	Name: Mr Hoo Boon Han
Company name: TDM Plantation Sdn Bhd Kemaman Palm Oil Mill	Company name: BSI Services Malaysia Sdn Bhd
Title: Mill Manager	Title: Lead Auditor
Signature:  TDM PLANTATION SDN. BHD. (A Member of TDM Berhad Group) Kemaman Palm Oil Mill (Company No. 110619-W)	Signature: 
Date: 11/10/17	Date: 30 August 2017
<p>(TN. HJ. SHAHBUDIN BIN USOP) Pengurus Kilang</p>	

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	TDM Plantation Sdn. Bhd. has developed a Social Issue Communication Flowchart dated 01/06/2016. Information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Requests for information from the Regulatory Department such as DOSH during compliance visit (23/7/2017) and DOE visit (9/10/2016) were attended and relevant issue recorded in the inspection book.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	All operating units maintain records of information request and response. Request for information are attended promptly and confirmed by stakeholders interviewed.	Complied
Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			

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Criterion / Indicator	Assessment Findings	Compliance	
<p>1.2.1</p> <p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p>	<p>There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>Access to these documents is made available upon request. Information relating to land titles, safety and health plans, pollution prevention plans was made available at all operating units. Procedure for complaints and grievances were available at notice boards. The company is in the progress to make available the documents on the company's website in the future.</p> <p>Among the documents that were made available for viewing are:</p> <ul style="list-style-type: none"> • Good Agricultural Practices • Social Enhancement • Sustainability Management Programmes • Complaint and Grievances procedure. • Environmental Conservation <p>These documents highlight current TDM Plantation Sdn Bhd practices and their continual improvement plans. Besides the above document TDM Plantations Sdn Bhd policy on the followings are also available:</p> <ol style="list-style-type: none"> 1) Social 2) Quality 3) Freedom of Association 4) Occupational Safety, Health and Environment 5) Environment & Biodiversity 6) Protection of Children 7) Gender <p>The policies were displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p>	<p>Complied</p>	
<p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p>			
<p>1.3.1</p>	<p>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.</p> <p>-Minor compliance</p>	<p>TDM Plantation Sdn Bhd has implemented Code of Ethical Policy dated 1/6/2017. The policy has been displayed at the notice board in front of office and canteen area. The workers also been briefed on the policy during morning muster.</p>	<p>Complied</p>
<p>Principle 2: Compliance with applicable laws and regulations</p>			
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			

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Criterion / Indicator	Assessment Findings	Compliance
<p>2.1.1 Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>Kemaman POM and supply base had continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. In POM, following license and permit available:</p> <ul style="list-style-type: none"> a. Department of Environment’s License no: 004055 valid till 30 June 2018 b. Diesel permit no: T009925 valid till 17 April 2018 c. Weighbridge calibration record; no: 5280766 valid from 30 March 2017 d. Air Receiver Tank; PMT108131 valid till 3 Dec 2017 e. Vacuum Drier 1; PMT10929 valid till 3 Dec 2017 f. Permit to purchase, store and use of sodium hydroxide- License 36544 g. MPOB License: 502392302000; expire 31 Mar 2018 <p>Air Putih Estate:</p> <ul style="list-style-type: none"> 1. MPOB license: 503558102000 valid till 31 July 2018 2. Diesel Permit # T009754 valid till 22 Aug 2017 3. Pressure Vessel Permit: PMT-TG/17 00563 dated 18 Mar 2018 4. Permit for wages deduction-PMT2010/044; effective from 1 Jan 2011. 5. Permit for purchasing paraquat; valid from 5 July 2017 till 25 July 2017; no: TRG/2017/PARA/133(GL) <p>MAIDAM Estate:</p> <ul style="list-style-type: none"> 1. MPOB License: 503576002000 valid till 31 Aug 2018 2. Diesel License; No: T005859 valid till 09 November 2017 	<p>Complied</p>
<p>2.1.2 A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -</p>	<p>List of applicable legal and other requirements was made available during the assessment and compiled in the Legal Register 2017. Documented procedure has been established and implemented; refer to SOP: Kemaman Palm Oil Mill: Procedure for Legal and Other Requirements dated November 2012.</p> <p>In POM, a summary of legal register FY2017 incorporating all the legal requirements are sighted during onsite. Similar documents sighted in the Air Putih and MAIDAM estate. Latest requirements such as Minimum Wages Order 2016 and Electric Supply Act 1990 (amended 2015) are registered in the list.</p> <p>Similar LORR sighted at both estate: Air Putih and MAIDAM estate.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
2.1.3 A mechanism for ensuring compliance shall be implemented. - Minor compliance -	<p>Evaluation of the legal requirements and compliance status with legal requirement are through internal audits by the compliance and productivity team.</p> <p>At POM, internal audit has been conducted on 19 September 2016 by compliance and productivity team manager. Assessment report for respective area with all the findings have been documented.</p> <p>At estate, the internal compliance audit conducted:</p> <ul style="list-style-type: none"> a. Air Putih Estate dated 26 July 2017 b. MAIDAM Estate dated 9 & 10 April 2017 	Complied
2.1.4 A system for tracking any changes in the law shall be implemented. - Minor compliance -	<p>Documented procedure has been established and implemented; refer to SOP: Kemaman Palm Oil Mill: Procedure for Legal and Other Requirements dated November 2012.</p> <p>The mill management will identify all legal and other requirements that are applicable to the Mill operations. The Group Legal Department, Plantation Coordinator and Plantation Advisor will advise of any new regulatory requirements. All the requirements will be evaluated once a year.</p>	Complied
<p>Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p>		
2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	<p>The Estates and Mill are on government lease land and they hold copies of Land Titles. The oil palm operations are consistent with the land title for agricultural purposes.</p> <p>For POM, the land title sharing with Pelantoh Estate. There were total 8 land titles in the Pelantoh Estate. For MAIDAM Estate, total 17 land titles sighted during onsite visit. In Air Putih Estate, there are total 5 land titles with 4933.26 ha.</p>	Complied
2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	<p>During the field visit at Air Putih Estate and MAIDAM Estate, it was noted that legal boundaries are clearly demarcated and visibly maintained using peg sighted during site visit to PM93 H2 and one of the GPS coordinates sampled (4°15.929'N; 103°13.040'E) in Air Putih Estate.</p>	Complied
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 free, prior and informed consent (FPIC). - Minor compliance -	<p>There is no land dispute in the Kemaman operating units at the time of audit. The land belongs to TDM and land ownership documents verified. Interviewed with the local communities confirmed that no land dispute case been reported.</p>	Complied
2.2.4 There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	<p>There is no land dispute in the Kemaman operating units at the time of audit. The land belongs to TDM and land ownership documents verified. Interviewed with the local communities confirmed that no land dispute case been reported.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
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 (including neighbouring communities where applicable). -Minor compliance	Complied
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	Complied
Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.		
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).. - Major compliance -	Complied
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) 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 -	Complied

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Criterion / Indicator	Assessment Findings	Compliance
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	There is no land dispute in the Kemaman operating units at the time of audit. The land belongs to TDM and land ownership documents verified. Interviewed with the local communities confirmed that no land dispute case been reported. Complied
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	There is no land dispute in the Kemaman operating units at the time of audit. The land belongs to TDM and land ownership documents verified. Interviewed with the local communities confirmed that no land dispute case been reported. Complied
Principle 3: Commitment to long-term economic and financial viability		
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.		
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 -	Kemaman POM had an annual budget for the financial year 2017. The palm oil mill budget includes the projected FFB processed, CPO and PK production which projected for five years from 2017 until 2021. It also incorporated item such as general charges, mill maintenance, process shift labour, general services, processing cost and fixed assets. Similar five years of projection plan from 2016 to 2021 sighted in Air Putih and MAIDAM Estate. The plan cover crop projection, CAPEX, mature and immature. Complied
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	Annual replanting programme projected for a minimum of five years (2016-2020) and yearly review conducted at the respective estate. <u>Air Putih Estate:</u> The previous replanting of 363.20ha was already completed during the visit. No replanting till FY2020. <u>MAIDAM Estate:</u> In 2017, the replanting of 255.80 ha already completed during the visit. There is another 320.07 ha replanting in 2018. Then no replanting till 2021. Complied
Principle 4: Use of appropriate best practices by growers and millers		
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.		

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.1.1</p> <p>Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p>	<p>SOP available for the Palm Oil Mill and the Estates.</p> <p>For Kemaman POM, the Standard Operating Procedure & Operation Manual updated on November 2012. (TDM/KPOM/01 dated 1 May 2011) as a guidance document to operate the mill. There are total 25 SOP has been documented.</p> <p>For estate, the SOP which revised on May 2017 has 2 section:</p> <ul style="list-style-type: none"> a. Section A- Total 19 SOP which cover all the operations such as boundary, muster, nursery, soil conservation and etc. b. Section B- Total 9 SOP which cover mainly on workshop, clinic, childcare centre, generator set, foreign workers, land dispute and waste. <p>Work Instructions in Bahasa Malaysia have been derived from SOPs and are posted at work stations at the mill and at certain locations at the estates, such as the Muster Notice Boards.</p>	<p>Complied</p>
<p>4.1.2</p> <p>A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -</p>	<p>External Mill Advisor and a Planting Advisor inspect and report on the operations on annual basis. There were other audits by compliance & productivity team to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements.</p> <p>Mill Advisor's latest visit was on 19-20 April 2017 by Sime Darby Seeds & Agricultural Services Sdn Bhd for the period of FY2016. Report includes monitoring of all activities in the mill covering:</p> <ul style="list-style-type: none"> a. Manpower deployment b. Production Performance c. Quality of Input FFB d. Quality of Palm Products and etc. <p>In MAIDAM estate, the planting advisor visited on 17 April 2017 for reviewing the performance of January to December 2017 of the estate. The report has been prepared by Sime Darby & Agricultural Services and encompassed the current agricultural condition crop production and financial status of the estate.</p>	<p>Complied</p>

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4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	<p>The records of monitoring and the actions taken maintained for more than 12 months. Records were verified during the document review found compliance.</p> <p>At POM, internal audit has been conducted on 19 September 2016 by compliance and productivity team manager.</p> <p>Mill Advisor’s latest visit was on 19-20 April 2017 by Sime Darby Seeds & Agricultural Services Sdn Bhd for the period of FY2016. Report includes monitoring of all activities in the mill covering manpower deployment, production performance, quality of input FFB and quality of palm products and etc.</p> <p>In Air Putih estate, agronomist report, FY2017 was carried out on 15/5/17 for Agronomic Visit to Oil Palm Nursery. Monitoring of pest & disease, palm nutrition status, fertilizer recommendation has been included in the report. Other matters such as field observation and agronomic matters was also incorporated in the report. For the field, the fertilizer recommendation 2017 cover the area for mature and immature area.</p> <p>In MAIDAM estate, the planting advisor visited on 17 April 2017 for reviewing the performance of January to December 2017 of the estate.</p>	Complied
4.1.4 The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	<p>All the FFB are from own certificate scope and adjacent TDM Plantation certified estates.</p> <p>The mill did not receive third party FFB.</p>	Complied
Criterion 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 -	<p>Good agriculture practices which follows the TDM Plantation’s Standard Operating Procedures to ensure soil conservation is managed to a level that ensures optimal and sustained yield. The SOP A6: Soil Conservation stated that reduction in the top soil thickness will affect oil palm growth and yield particularly due to damage to the feeder roots. Therefore, soil conservation is part of Good Agricultural Practices (GAP).</p> <p>Both estates operates in accordance with the TDM management systems and standard operating procedures. The practices consistently monitored by plantation advisors and recommendations for improvements are given to maintain the sustainable practices.</p>	Complied

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4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	The application of fertilizer has been recorded in the application program form. Fertilizer application was based on internal TDM agronomist recommendation (2017) Agronomic & Fertilizer. Recommendation was made as following for sampled field 94A1 of Air Putih Estate: a) Feb 2017: AC-NK1 = 3.50kg/palm b) Apr 2017: Kies-Bor = 2.50kg/palm c) May 2017: AC-NK2 = 3.50kg/palm d) Aug 2017: AC-NK3 = 3.00kg/palm For MAIDAM estate: Block PR2017A; Immature area: Feb- CPD= 3.50kg/palm and AJIB2= 2.60KG/palm	Complied																						
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	TDM Plantation Agronomy & Advisory department prepared the soil analysis result 2016. Leaf analysis result which shows the nutrient level was used as guidance for the fertilizer recommendation. Leaf sampling carried out on June 2016. Foliar Analysis Summary indicate the different nutrient and levels of different samples. For MAIDAM estate, the soil sampling report dated 4 July 2016; report no: SE/1606/0267-0270 and leaf analysis results documented in the Agronomic Report & 2016 Fertilizer Recommendations.	Complied																						
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	EFB application only applied to selected fields at the estates especially area far from the water source. Record for the EFB application at each block sighted during onsite visit. Inspection of the area at Air Putih Estate- PR15B and PM97A and confirmed the EFB application as per their mapping. At the replanting block PR2017A of Air Putih estate, the palm trunk and fronds are chipped and shredded to pieces to allow rapid decomposition of the residues	Complied																						
Criterion 4.3: Practices minimise and control erosion and degradation of soils.																									
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Soil series map available for both estates visited. No other soil categorised as problematic or fragile soil. Following the soil series for the Air Putih Estate: <table border="1" data-bbox="660 1480 1082 1635"> <thead> <tr> <th>Soil Series</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Rengam</td> <td>57</td> </tr> <tr> <td>Bungor</td> <td>27</td> </tr> <tr> <td>Tanah Curam</td> <td>4.50</td> </tr> <tr> <td>Others</td> <td>11.50</td> </tr> </tbody> </table> In MAIDAM estate: <table border="1" data-bbox="660 1691 1082 1877"> <thead> <tr> <th>Soil Series</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Sri Kuala Brang</td> <td>82.11</td> </tr> <tr> <td>Siri Chempaka</td> <td>11.18</td> </tr> <tr> <td>Siri Bukit Tunku</td> <td>0.61</td> </tr> <tr> <td>watercourse</td> <td>1.02</td> </tr> <tr> <td>Steepland</td> <td>5.08</td> </tr> </tbody> </table>	Soil Series	%	Rengam	57	Bungor	27	Tanah Curam	4.50	Others	11.50	Soil Series	%	Sri Kuala Brang	82.11	Siri Chempaka	11.18	Siri Bukit Tunku	0.61	watercourse	1.02	Steepland	5.08	Complied
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4.3.2 A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	<p>Recently replanted area is established with cover crops and vegetation is well established. Field inspection showed groundcover with soft grass and soft weeds. There is no significant erosion risk was noted during the field visit.</p> <p>Terracing and "Stops bunds" have been constructed to reduce the soil erosion. It was confirmed area with more than 25 degree has no planting of oil palm during visit at block 13A and 13B at Air Putih Estate.</p> <p>There are no peat soils or soil categorised as problematic or fragile soil at both estates.</p>	Complied
4.3.3 A road maintenance programme shall be in place. - Minor compliance -	<p>Road maintenance program for Air Putih 2017 sighted available. For example for the mature area:</p> <ul style="list-style-type: none"> a. Road Grading- 1304.46 ha b. Culvert- 78 ha c. Resurfacing- 104 ha <p>At MAIDAM estate, the road programme 2017 for road maintenance which encompassed 500.16 ha of PM98A1, PM98A2 and PM98A3.</p>	Complied
4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	<p>There are no peat soils or soil categorised as problematic or fragile soil at both estates.</p>	Complied
4.3.5 Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	<p>There are no peat soils or soil categorised as problematic or fragile soil at both estates.</p>	Complied
4.3.6 A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	<p>There are no peat soils or soil categorised as problematic or fragile soil at both estates.</p>	Complied

Criterion 4.4:

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

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Criterion / Indicator	Assessment Findings	Compliance												
<p>4.4.1</p> <p>An implemented water management plan shall be in place. - Minor compliance -</p>	<p>In POM, the water management plan 2017 has incorporated following elements:</p> <ul style="list-style-type: none"> a. Water consumption monitoring b. Action plan to reduce water usage c. Contingency plan during water shortage 2017 <ul style="list-style-type: none"> i. Treated water for mill and government supply- SATU; ii. Awareness training d. Identification & management of wastewater 2017 <ul style="list-style-type: none"> i. Wastewater produced from different station and treatment/containment method e. Water Analysis <ul style="list-style-type: none"> i. River water & effluent analysis <p>For estate, the water management plan focusing in the water reduction plan and contingency plan during water shortage.</p>	<p>Complied</p>												
<p>4.4.2</p> <p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -</p>	<p>Documented as a Slope Protection & River Buffer Zone Policy (Signed by CEO TDM Plantation dated 1 Jun 2017) established as following:</p> <table border="1" data-bbox="660 1025 1299 1211"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>< 5 meters</td> <td>5 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>> 40 meters</td> <td>50 meters</td> </tr> </tbody> </table> <p>Riparian buffer zone are well maintained especially both estates surrounding by the mangroves. Signboard and markers are well established at the key area and no activities such as spraying and planting at those buffer area.</p> <p>The water sampling exercise for river samples was carried out on yearly basis.</p>	River width	Buffer zone	< 5 meters	5 meters	5 to 10 meters	10 meters	10 to 20 meters	20 meters	20 to 40 meters	40 meters	> 40 meters	50 meters	<p>Complied</p>
River width	Buffer zone													
< 5 meters	5 meters													
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> 40 meters	50 meters													
<p>4.4.3</p> <p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -</p>	<p>Palm Oil Mill Effluent (POME) treated through anaerobic pond treatment system where the licensed limit for final discharge BOD allowed by DOE was 100mg/l through discharge to river course.</p> <p>Parameter monitored-: pH, Total Alkalinity, VFA, BOD, COD, TS, SS, VSS, TN, AN, O&G. Effluent Analysis conducted by Felda Industries Sdn Bhd and submitted to DOE every 3 months through OER (Online Environmental Report). Following report sighted:</p> <ul style="list-style-type: none"> a. Report dated 14 June 2017-BOD: 59mg/L b. Report dated 24 May 2017- BOD: 66mg/L c. Report dated 19 April 2017- BOD: 29mg/L <p>BOD limit for final discharge <100mg/L were met as well as all parameters that were within allowable limit.</p>	<p>Complied</p>												
<p>4.4.4</p> <p>Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -</p>	<p>In POM, the water usage monitoring for FFB/tonne on monthly basics:</p> <ul style="list-style-type: none"> a. Apr 2017: 2.49 m³/t FFB b. May 2017: 2.49 m³/t FFB c. Jun 2017: 2.35 m³/t FFB 	<p>Complied</p>												

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Criterion / Indicator	Assessment Findings	Compliance
Criterion 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 (IPM) plans shall be monitored. - Major compliance -	<p>The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures.</p> <p>Barn owls has been introduced for biological control of rats. Barn owl boxes are constructed at the rate of 1 box to 10ha. Plantation advisor report and Census records show that there is outbreak of leaf eating pest i.e bagworm. Chemical treatment being carried out with the approval from Agriculture Department. Records of rat baiting and barn owl census are available. The latest summary barn owl census in April & May 2017 indicate the box occupied 95.88%. In MAIDAM estate, the latest barn owl census dated 28 Jun 2017 indicated the box occupied is 45%.</p> <p>As biological control, beneficial plants are continuously being established along roadsides to attract natural predators. The estates have planted beneficial plants such as <i>Turnera subulata</i> and <i>Antigonon leptopus</i>. Up to date, the beneficial plant chain in Air Putih estate is 2.2km.</p> <p>Records of planting of new areas and maintenance of existing areas of beneficial plants and location maps are available.</p>	Complied
4.5.2 Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>In Air Putih Estate, training records for staff on IPM implementation were available and verified to be satisfactory during on-site assessment. The training on barn owl, parasite and cover crop conducted on 21 Jun 2017.</p> <p>In MAIDAM estate, the training for the beneficial plant conducted to the workers on 14 June 2017.</p>	Complied
Criterion 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 -	Justification of pesticides applied is available in the TDM agriculture policy. Refer to agriculture policy no 05.02 and 05.03 weed control for immature & mature oil palm. For pest and disease control, refer to 09-01 – 09-08. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species.	Complied

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4.6.2	<p>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.</p> <p>- Major compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) were maintained. For example:</p> <p>Air Putih Estate (Jan-May 2017):</p> <ul style="list-style-type: none"> a. Paraquat- 0.39 a.i/ha b. Glyphosate isopropylamine- 4.12 a.i/ha c. Glyphosate Pottasium- 0.11 a.i/ha <p>Maidam Estate:</p> <ul style="list-style-type: none"> a. Apr 2017- Ally 	Complied
4.6.3	<p>Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines.</p> <p>- Major compliance -</p>	<p>Use of pesticide is minimized and part of the IPM programme. To reduce chemical use the following is implemented in MAIDAM and Air Putih:</p> <ul style="list-style-type: none"> a) Planting of beneficial plant b) Barn Owls 	Complied
4.6.4	<p>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 national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances.</p> <p>- Minor compliance -</p>	<p>Based on chemical register dated 5/3/17 and on site visit at chemical store, noted the use of class IB chemical- paraquat as to control cover crop in the immature field.</p> <p>Chemical register dated 5 March 2017 was sighted. There is IB used for weeding at immature area. Refer to Permit to buy class IB chemical, paraquat dichloride. Refer to ref# TRG/2017/PARA/133(GL) valid until 25/7/17 for total of 200 liter. '</p> <p>SDS for the said chemicals are available at the store in Dual-language (Bahasa Malaysia and English). I.e Paraquat Dichloride (reduced Ai @ 13%), GLYSO 410 (Glyphosate isopropylammonium) and FOXIL (triclopyr butotyl)</p>	Complied
4.6.5	<p>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 workers (see Criterion 4.7).</p> <p>- Major compliance -</p>	<p>Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them during the morning muster.</p> <p>In MAIDAM estate, the training for safety handling of hazardous chemicals at workplace conducted on 5 September 2016.</p> <p>The training for activity on Pesticide calibration and calculation was conducted on 19/4/2017 by MyCROP SDn Bhd. And Hazardous Chemical handling and PPE usage Training dated 22/4/2017 by Medi Ihsan OSH. The record was verified.</p>	Complied

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4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution. The Pesticide were be kept under lock and key. During visit it was noted that the pesticide were properly labelled and MSDS/SDS at the location. And all the remaining pesticides are kept in the store and securely locked another room and comply with regulation.	Complied
4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in TDM Plantation SOP: A12: Weeding- Immature and A13: Weeding- Mature. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5.	Complied
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 -	Not applicable.	Complied
4.6.9 Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	No associated smallholders. Employees handling pesticide given knowledge and skill required by the OSH Department to cover safe handling practices and standard operating procedures which was latest conducted on 19/4/2017. And the training related to the spraying activities was conducted on 21/2/2017 to the sprayers at Air Putih Estate.	Complied
4.6.10 Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	Proper disposal of waste material are carried out as per the company procedures. The procedures are fully understood by workers and managers. Workers interview reveal that they are aware of the zero burning policy including domestic waste are not allowed to be burned. Management disposes waste material as per regulation for schedule waste and domestic waste. The domestic waste dispose at proper allocated location with proper fencing and signage. While the schedule waste dispose vis the approved DOE contractor and proper document kept as evidence.	Complied

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<p>4.6.11</p> <p>Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.</p> <p>- Major compliance -</p>	<p>Annual medical surveillance for sprayers and pesticide operators were demonstrated.</p> <p><u>Air Putih Estate:</u> Medical surveillance carried out once a year for all pesticides handlers. The medical surveillance was carried out by Klinik Bestari Sdn Bhd, OHD HQ/08/DOC/00/352 on 24-27/9/2016. Total 45 chemical handlers and foremen were sent for medical surveillance and sampled of reports as below:</p> <ul style="list-style-type: none"> a. Passport No.: AT 070309 b. Passport No.: AT 070275 c. Passport No.: AP 835510 <p>All the sampled chemical handlers and foreman has no detrimental of health.</p> <p><u>MAIDAM Estate:</u> Medical surveillance carried out once a year for all pesticides handlers. The medical surveillance was carried out by Klinik Medic Bestari Sdn Bhd, OHD HQ/08/DOC/00/352 on 28/8/2016 and 4/12/2016. Total 3 chemical handlers were sent for medical surveillance and sampled of reports as below:</p> <ul style="list-style-type: none"> a. Employee No.: MA00006 b. Employee No.: MA1500358 <p>All the sampled chemical handlers has no detrimental of health.</p>	<p>Complied</p>
<p>4.6.12</p> <p>No work with pesticides shall be undertaken by pregnant or breast-feeding women.</p> <p>- Major compliance -</p>	<p>Currently no female pesticide operators as indicate by the Asst. Manager. It was further verified through the worker's profile and medical record.</p> <p>Interviewed the female workers and them aware the protocol being transfer to other job if there is a female pregnant who work with pesticides.</p> <p>The signage observed at changing area indicating no work with pesticide shall be taken by pregnant and breast feeding.</p>	<p>Complied</p>
<p>Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:</p>		

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<p>4.7.1</p> <p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p>	<p><u>MAIDAM Estate:</u></p> <p>CHRA was conducted on 5-15/1/2016 by Occumed Consultancy & Services Sdn Bhd (JKKP IH 127/171-2(08)).</p> <p>TDM Plantation Sdn Bhd has maintained an approved Health and Safety Management Policy dated 1Jun 2017 signed by the CEO that is displayed prominently on notice boards in local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site Assistant manager/officers and monitored by Sustainability Manager from Head Office.</p> <p><u>POM</u></p> <p>OSH management plan for 2017 was established to monitor the task and activities. The plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency drills, treatment of illness/injury during the job, use of PPE, OSH Committee meetings, etc. Safety committee organization available dated April 2017. Safety committee Minutes of meeting sighted for 14 May 2017 and 06 March 2017</p> <p>The following at monitoring implemented at POM:</p> <ul style="list-style-type: none"> • Additional Noise Exposure Monitoring reports dated 3 Oct 2016. • Audiometric test reports dated 22-23 Feb 2017 Positive Noise Monitoring done on 3 Nov 2012. • JKKP Visit on 23 July 2017 comment given and action taken • Chemical Health Risk Assessment (CHRA) done on May 2015. <p>LEV –Inspection, Examination & testing of Engineering control Equipment reports date March 2017.</p> <p>Monthly Inspection Firefighting equipment records.</p> <p><u>Air Putih Estate</u></p> <p>Chemical Health Risk Assessment (CHRA) done on 14 June 2016 by Occumed Consultancy & services JKKP IH 127 /171—2-(08)</p> <p><u>MIADAN Estate</u></p> <p>Chemical Health Risk Assessment (CHRA) done on 05 Jan 2016 by Occumed Consultancy & services JKKP IH 127 /171—2-(08)</p>	<p>Complied</p>

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<p>4.7.2</p> <p>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 -</p>	<p>HIRARC had been carried out on all operations where health and safety is an issue. Significant hazards were determined and documented in the HIRARC analysis which included Pressing station, Boiler, Nut Cracking, Kernel Plant, etc. HIRARC review on 1 Jan 2017. Procedure for HIRARC-SOP TDM/KPOM/02 Dated 1 Jan 2017. HIRARC Master list 2017 which cover 23 department/section.</p> <p><u>Air Putih Estate</u> All HIRARC review on 25 May 2017. The HIRARC related to the transport-Starting Machine, Daily Preventive Maintenance, Cutting of FFB and frond had been reviewed with changes and updated on 07/6/2017.</p> <p><u>MAIDAM Estate</u> All HIRARC review on 1 June 2017. The HIRARC related to the transport-Starting Machine, Daily Preventive Maintenance, Cutting of FFB and frond had been reviewed with changes and updated on 07/6/2017</p>	<p>Complied</p>

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<p>4.7.3 All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -</p>	<p>Training program planned for year 2017 was implemented consistently. The program includes training for all categories of workers. The training requirement for operation unit identified the need for each roles. Evidence of adequate and appropriate training on -safe working practices provided to both estate:</p> <p><u>POM</u></p> <ul style="list-style-type: none"> • OSH Training schedule available for 2017. • The following training had been conducted: • HIRARC Training-dated 1 April 2017 • Hearing Conservation dated 14 May 2017 • Incident Investigation dated 23 July 2017 • Authorised Entrant and standby Person dated 19 Feb 2017, 23 April 2017 • Taklimat Kebakaran Dapur gas- 24 Jan 2017 • ERT dirll-18 June 2017 • RSPO Training-Review major principles dated 7 June 2017 <p><u>Air Putih Estate</u></p> <ul style="list-style-type: none"> • Fire drill-21 May 2017 • Hazard Identification Training 10 June 2017 • HIRARC training 11 June 2017 • What MSDS/CSDS-29 May 2017 • Chemical Handling And PPE-29 April 2017 • SOP –PPE training-17 Jan 2017 <p><u>MAIDAM Estate</u></p> <ul style="list-style-type: none"> • Fire Extinguisher Training-13 July 2017 • First Aid Training-27 July 2017 • Pesticide Sprayer Training-15 Feb 2017 • Poisoning of "anak Kayu" -16 Feb 2017 • HIRARC training -15 Feb 2017 	<p>Complied</p>

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<p>4.7.4</p> <p>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 and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>The responsible persons are the Assistant Managers of the respective operating units. OSH committee/First Aider/ERT organization chart for 2017 seen. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to be satisfactory.</p> <p><u>POM:</u> Safety committee organization available dated April 2017. Safety committee Minutes of meeting sighted for 14 May 2017 and 06 March 2017.</p> <p><u>Air Putih Estate</u> Safety committee organization available. Safety committee Minutes of meeting sighted for 21 May 2017 and 12 Feb 2017.</p> <p><u>MAIDAM Estate</u> Safety committee organization available. Safety committee Minutes of meeting sighted for 24 May 2017 and 22 Feb 2017.</p>	<p>Complied</p>
<p>4.7.5</p> <p>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 -</p>	<p>Accident and emergency procedures had been written and briefed to staff, workers, contractors and visitors. Emergency response Team organization chart for 2017/2018 available. ERT Training schedule 2017 sighted. Workers trained in firefighting, Rescue method</p> <p>Records on all accidents had been verified to be maintained satisfactorily. Quarterly review on accident cases had been carried out during quarterly meeting of Safety & Health (OSH).</p> <p><u>POM:</u></p> <ul style="list-style-type: none"> • Firefighting -13 April 2017, Smoke Drill done on 14/04/16. • "Taklimat Aktiviti Pasokan" ERT KPOM -30 March 2017 and participated by workers and staff. <p><u>Air Putih estate</u></p> <ul style="list-style-type: none"> • SOP for Fire Briefing dated 20 June 2017 to all ERT Team. • Emergency Fire and Fire equipment Training by BOMBA-14 May 2017. • First Aid Training date 6 June 2017 <p><u>MAIDAM Estate</u></p> <ul style="list-style-type: none"> • Briefing dated 23 April 2017, 13 Feb 2017 to all ERT Team • Fire Extinguisher Training-13 July 2017. First Aid Training-27 July 2017. 	<p>Complied</p>

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<p>4.7.6</p> <p>All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -</p>	<p>Air Putih Estate: Medical care is provided to all the employees. Local workers are covered under SOCSO scheme while foreign workers are covered under Foreign Workers Compensation Scheme. Sampled of insurance policy as below:</p> <ul style="list-style-type: none"> a. Syarikat Takaful Malaysia Berhad Policy No. : TEW00021641 valid until 26/7/2018. b. Syarikat Takaful Malaysia Berhad Policy No. : TEG00009690 valid until 15/7/2018. c. Zurich Insurance Malaysia Berhad Policy No.: 801000001195-00 valid until 14/10/2017. (Contract's Workers) d. Zurich Insurance Malaysia Berhad Policy No.: 801700000600-00 valid until 26/6/2018 (Contract's Workers) <p>MAIDAM Estate: Total 17 foreign workers were recruited in the estate. Seen the FWCS Insurance Policy as below:</p> <ul style="list-style-type: none"> a. RHB Insurance Berhad Policy No.: MW166113 valid until 16/6/2018. b. RHB Insurance Berhad Policy No.: MW117544 valid until 22/11/2017. <p>All the local workers were covered with SOCSO. Seen the payment records of SOCSO for May 2017, June 2017 and July 2017.</p>	<p>Complied</p>
<p>4.7.7</p> <p>Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -</p>	<p>Records on Lost Time Accident (LTA) metrics was maintained and based on accident statistic monitoring, JKKP 6, 7 & 8. Sample of accident statistic as shown below:</p> <p>In POM, all accidents are investigated and reported to Head Office and DOSH. Last LTI occurred on 28/7/16 with 18 lost mandays. 2 accident recorded for 2016 with total of 34 LTI. Verified JKKP 6 and JKKP 8 for 2016 via Mykkp. Verified acceptance record, ref# JKKP 8/3760/2016.</p> <p>In Air Putih, accident statistics based on JKKP 8 for 2016: Air Putih – 1 case with 60 LTI recorded.</p>	<p>Complied</p>
<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>		

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<p>4.8.1</p> <p>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.</p> <p>- Major compliance -</p>	<p>Formal training program for the year 2017 available and implemented. Regular assessment of training conducted to ensure understanding among the employees. Trainings conducted include a formal training program on all aspects of RSPO Principles and Criteria and the Supply Chain Certification System. The various trainings conducted and the training records maintained to be acceptable. Following the sample:</p> <p><u>POM</u></p> <ul style="list-style-type: none"> - Operation – Kernel Plant and Depericarping (9/3/17) - Boiler Operation Training (10/4/17) - Laboratory Training (16/5/17) - MSPO policy awareness training – 14/8/17 - HIRARC Training – 1/4/17 - Hearing Conservation Training – 14/5/7 - Incident Investigation – 23/7/17 - Authorized Entrant and Standby Person refresher – 19/2/17 and 23/4/17 <p><u>Air Putih</u></p> <ul style="list-style-type: none"> - Chemical Handling and PPE Training – 29/4/17 - Harvesting Training – 22/2/17 - Spraying Training – 17/1/17 - Manuring Training – 1/2/17 - First Aid Training – 8/6/17 	<p>Complied</p>
<p>4.8.2</p> <p>Records of training for each employee shall be maintained.</p> <p>- Minor compliance -</p>	<p>Records of training for employees available and maintained. Records verified on a sampling basis at the Mill and estates visited covers all aspect of training and RSPO P&C. The following samples of training observed in the records for estate.</p> <p><u>POM</u></p> <p>The training records for HIRARC Training, Hearing Conservation ,Incident Investigation ,Authorised Entrant and standby Person ,Taklimat Kebakaran Dapur gas- RSPO Training-Review major principles</p> <p><u>Air Putih/MAIDAM Estate</u></p> <p>As in 4.7.3. All Record for those training sighted</p>	<p>Complied</p>

Principle 5: Environmental responsibility and conservation of natural resources and biodiversity

Criterion 5.1:

Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.

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<p>5.1.1 An environmental impact assessment (EIA) shall be documented. - Major compliance -</p>	<p>TDM Plantations has established SOP for environmental aspects and impacts evaluation; dated 1 May 2011; rev: KPOM-01/2011.</p> <p>The annual review carried out on environmental impacts in term of Environmental Impact Assessment management Action Plans and Continuous Improvement Plans. Evidences in EIE/EIA review team identified and review performed.</p> <p><u>POM</u> SOP for EIA dated 1 May 2011. The last review was conducted on 1 Jan 2017.</p> <p><u>Air Putih Estate</u> The last review on Environmental Aspect and Impact Assessment evaluation was conducted on 1 Jan 2017.</p> <p><u>MAIDAM Estate</u> The last review on Environmental Aspect and Impact Assessment evaluation was conducted on Jan 2017. However, vehicle maintenance activities observed onsite is not documented in the EIA:</p> <ol style="list-style-type: none"> a. There is no proper location for Tractor cleaning. And oil trap was not available. b. The Oil Change /top up /Lubricating/small repair, and overnight parking for the vehicles without proper location. 	<p>Major nonconformance</p>
<p>5.1.2 Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -</p>	<p>As for the review process, the environment & management plan and re-evaluate if any new activities in POM and estate, changes of legislation and environmental issue raise by stakeholders.</p> <p><u>POM</u> No changes required after the reviewed for POM EIA.</p> <p><u>Air Putih & MAIDAM Estate</u> An environmental improvement plan 2017 was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring, which is adaptive to operational changes which involved reduced water usage, land erosion on slope, use environmental friendly ways for reduction of insect (ulat Bungkus) and avoid poison item into waterway. This is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts.</p> <p>The monitoring & action plan are ongoing and the person in charge always by Estate Manager and Assistant Manager.</p>	<p>Complied</p>

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5.1.3	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p>	<p>The established environmental improvement plan/ pollution prevention plan (review on June 2017) has covered all the environmental issue, mitigating measure, action PIC, time frame and status.</p> <p>Results of the programs that were monitored will determine operational changes whether have positive or negative environmental impacts. For example, in Tebak estate management plan updated on 12 Jan 2017. List for environmental improvement plan as such:</p> <ol style="list-style-type: none"> River water quality monitoring Waste management Reduction of pesticide Recycling 	Complied
<p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p>			
5.2.1	<p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>- Major compliance -</p>	<p>As reported during last assessment, the HCV assessment was conducted in November 2011 by an independent consultant from SRA Consultancy with working experience in conducting HCV and Social Impact Assessment. HCV Toolkit for Malaysia by WWF – Malaysia was used. There were appropriate consultation processes as per the HCV Toolkit-Malaysia which covers the three main components of identification, management and monitoring.</p> <p>The assessment cover all the estates including the POM.</p>	Complied
5.2.2	<p>Where rare, threatened or endangered (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 a management plan.</p> <p>- Major compliance -</p>	<p>Based on the assessment report findings, endangered, rare and threatened species by IUCN was recorded during the surveys. Among the species recorded are elephant (<i>Elephas maximus</i>), Malayan tiger (<i>Panthera tigris corbetti</i>), Malayan tapir (<i>Tapirus indicus</i>) and wild boar. It is due to certain estate bordering with the forest reserve.</p> <p>No HCV management plan available for Air Putih and MAIDAM estate although different type of wild life being sighted within the estate vicinity according to the animal sighting record and interview with the workers.</p>	Major nonconformance
5.2.3	<p>There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated 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.</p> <p>- Minor compliance -</p>	<p>Mechanism for reporting the sightings of various types of wildlife, were found to have been in place. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented.</p> <p>Signage’s that prohibit hunting, fishing and water polluting activities were verified on-site at the both visited estates found to have been satisfactorily maintained. In Air Putih and MAIDAM estate, HCV signage observed at the pond area and also the bothering forest reserved.</p>	Complied

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5.2.4 Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	Mechanism for reporting the sightings of various types of wildlife, were found to have been in place. For example, the latest sighting record dated 10 June 2017; a python being observed at the line sites.	Complied
5.2.5 Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	It is verified that there has been no instance of HCV set-aside that conflicts with the rights of local communities at the estates visited. Thus negotiated agreement of such nature is not applicable.	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.		
5.3.1 All waste products and sources of pollution shall be identified and documented. - Major compliance -	Estates has established Waste Management Action Plan FY 2017. Few type of waste has been identified i.e. Scheduled Waste, Domestic Waste and Industrial Waste. The source of these wastes were mainly located at mechanical/electrical workshop, chemical store, scheduled waste store, line site, office, mill effluent pond. Other specific type of waste generated by the mill is organic (biomass) waste which is also a source of renewable energy consists of fibres, shells, empty fruit bunches, boiler ashes and decanter solids. Other specific activities such as mill maintenance and estate vehicle workshop generate few categories of scheduled waste such as SW 305, SW 102 and SW 410.	Complied
5.3.2 All chemicals and their containers shall be disposed of responsibly. - Major compliance -	The disposal of used chemicals and containers were done in accordance with their schedule on waste management as planned. Stores for scheduled waste were inspected at audited sites i.e. Mill and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. The mill and estates also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. <u>Air Putih Estate:</u> All chemical containers are triple-rinsed and pierced before transferred to Scheduled Waste Store. All the chemical containers will be disposed by the approved license contractor. Part of the agrochemical containers are recycled for pre-mixing agrochemicals.	Complied

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<p>5.3.3</p> <p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p>	<p>Air Putih Estate: Air Putih Estate has generated scheduled waste such as SW 305, SW 409 and SW 410. The scheduled waste was collected by Hiap Huat Chemicals Sdn Bhd who is an approved license contractor. Seen the approved licenses to transport and handle the schedule waste as below:</p> <ul style="list-style-type: none"> a. License No.: 004390 for SW 410 b. License No.: 004162 for SW 409 c. License No.: 003201 for SW 305 and SW 306 d. And etc. <p>Disposal records for scheduled waste were sighted as below:</p> <ul style="list-style-type: none"> a. Consignment No.: HC011213 for SW 409 Used plastic containers on 20/3/2017 (0.688 mt) b. Consignment No.: HC011214 for SW 305 Spent lubricating oil on 20/3/2017 (0.200 mt) c. Consignment No.: H012364 for SW 409 Used plastic containers on 26/7/2017 (100 units) d. Consignment No.: HC012362 for SW 305 Spent lubricating oil on 26/7/2017 (500 litres) <p>MAIDAM Estate: MAIDAM Estate has generated scheduled waste such as SW 305, SW 409 and SW 410. The scheduled waste was collected by 3R Quest Sdn Bhd who is an approved license contractor. Seen the approved license no. 003297, 003295 and 003313 to transport and handle the schedule waste.</p> <p>Disposal records for scheduled waste were sighted as below:</p> <ul style="list-style-type: none"> a. Consignment No.: 12810 for SW 409 Contaminated Containers on 29/3/2017 (228 pcs) b. Consignment No.: 12809 for SW 410 Contaminated Rags/ Gloves on 29/3/2017 (152 pcs) 	<p>Complied</p>
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		

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<p>5.4.1</p> <p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -</p>	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement.</p> <p>Apart from use of grid electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler. The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO.</p> <p>Electricity generation was through steam turbine and boiler where Palm fibre and PK shells were used as renewable energy/fuel on a 70:30 ratio basis. Monthly records of energy consumption of non-renewable and renewable fuel per metric tonne of palm product at the Mill were available. For shell and fibre usage monitoring example: a. April- 0.06 shell/ FFB (MT); 0.14 fibre/FFB (MT) b. May- 0.06 shell/ FFB (MT); 0.14 fibre/FFB (MT) c. June- 0.06 shell/ FFB (MT); 0.13 fibre/FFB (MT)</p> <p>For diesel usage monitoring: a. April- 1.44 diesel litre/ FFB (MT); b. May- 1.72 diesel litre/ FFB (MT); c. June- 2.04 diesel litre/ FFB (MT);</p> <p>Air Putih Estate a. April- 5.77 diesel litre/ FFB (MT); b. May- 5.23 diesel litre/ FFB (MT); c. June- 5.28 diesel litre/ FFB (MT);</p> <p>MAIDAM Estate a. April- 10.75 diesel litre/ FFB (MT); b. May- 5.88 diesel litre/ FFB (MT); c. June- 6.81 diesel litre/ FFB (MT);</p>	<p>Complied</p>
<p>Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>		
<p>5.5.1</p> <p>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, or comparable guidelines in other regions. - Major compliance -</p>	<p>Based on the action plan to prevent open burning which includes planting cover crops, installing zero burning notice boards, briefing and etc. Furthermore, the Group policy of "Zero open burning" is enforced since July 2008. The operating units were all adhered to the policy of "Zero open burning" for any replanting, if any, in the estates.</p> <p>Field inspections made in Air Putih and MAIDAM estates field showed no evidence of open burning.</p>	<p>Complied</p>

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5.5.2	<p>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, or comparable guidelines in other regions.</p> <p>- Minor compliance -</p>	<p>The operating units have adhered to the zero burning practices under Safety, Health and Environment Policy (updated on 1 June 2017) for replanting at the estates.</p> <p>There was no evidence of any burning of domestic waste at the housing line sites and at the domestic landfills of the estates during on site field assessment.</p>	Complied
<p>Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>			
5.6.1	<p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).</p> <p>- Major compliance -</p>	<p>Smoke emission was monitored using online system (CEMS-DIS) to DOE based on the transmitted data from boiler smoke density indicator and recorder. Emission result was found in compliance with the regulatory limit. It was verified during site visit.</p> <p>To ensure boiler dust concentration comply with the stipulate limit of 0.4 gm/Nm³ as stipulated in the Environmental Quality (Clean Air) Regulations, 1978. The monitoring conducted every 6 monthly by Environmental Science (M) Sdn Bhd. Result as below:</p> <ul style="list-style-type: none"> a) Stack Flue Gas of Boiler No. 2 dated 15 June 2017; Result: 0.2251 at 12 % CO₂ b) Stack Flue Gas of Boiler No. 1 dated 29 Dec 2016; Result: 0.3613 at 12 % CO₂ <p>River monitoring conducted once a year according to the Standard B Acceptable Conditions for Discharge of Industrial Effluent or Mixed. The latest monitoring conducted on March 2017 by Eralab (KT) Sdn Bhd. Sample taken from the upper, middle and downstream of water source. All the result indicated compliance within the permissible limit.</p> <p>River Water Quality monitoring program conducted on 24 March 2016 in Air Putih and 7 June 2017 in MAIDAM estate. All parameters measured in compliance with the limit stated in Class IIA/IIB of National Water Quality Standards for Malaysia (NWQSM).</p>	Complied
5.6.2	<p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented.</p> <p>- Major compliance</p>	<p>Main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH₄) emission through POME treatment as well as boiler stack from the mill. Other less significant GHG emissions identified including CO_x, SO_x and NO_x from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>Biogas project has been budget and plan to commission in April 2019.</p>	Complied

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5.6.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Monitoring and reporting of the significant pollutants to water, gaseous emission to air and contamination on land are in place. Tools and systems used include the DOE online consignment note for schedule waste, water quality at discharge points as per DID regulations and schedule waste disposal were adhering to DOE requirements.</p> <p>Water samples were regularly taken by the officer and analysed to DOE requirements at the final discharge points. The water samples were sent for analysis by Felda Industries Sdn Bhd. Records are maintained and verified on site to have met the permissible level BOD <100ppm.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 is used and the management opted for full version was applied. These GHG calculations were done as per certification unit basics including 1 estate only. Summary emissions:</p> <ul style="list-style-type: none"> a. Emission/ mt CPO= 3.48 tCO2 e/mt CPO b. Emission/ mt PK= 3.48 tCO2 e/mt PK 	Complied
<p>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</p>			
<p>Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>			
6.1.1	<p>A social impact assessment (SIA) including records of meetings shall be documented.</p> <p>- Major compliance -</p>	<p>SIA was conducted on 23/10-1/11/2011 by SRA Consultancy. The assessment was covered the whole Kemaman Complex which included Kemaman POM, Pelantoh Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, MAIDAM Estate and Tebak Estate. The assessment team has interviewed with the relevant stakeholders such contractors, local communities, internal workers included local and foreign and etc.</p>	Complied
6.1.2	<p>There shall be evidence that the assessment has been done with the participation of affected parties.</p> <p>- Major compliance -</p>	<p>The attendance list of stakeholders interviewed during SIA was sighted. The assessment team has interviewed about 300 of relevant stakeholders. Interviewed with the stakeholder during surveillance audit confirmed that they had attended the assessment meeting before.</p>	Complied
6.1.3	<p>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 timetabled, including responsibilities for implementation.</p> <p>- Major compliance -</p>	<p>The mill and estates have developed SIA Action Plan for Y2017 which covered the social profile such as safety & health, education, housing & infrastructure and etc. The plan was developed through the issues raised during SIA and stakeholder meetings. The plan has incorporated the specific time frame with the person in charge to solve the issue. The SIA plan was updated by each SOU accordingly. The updated SIA plan for each issues raised in the stakeholder meeting was verified.</p>	Complied

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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 -	The plan was reviewed on yearly basis and the last review was conducted on 1/1/2017 for mill, 30/7/2017 for Air Putih Estate and 23/1/2017 for MAIDAM Estate. Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No smallholder schemes at Kemaman Certification Unit Not applicable
Criterion 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 -	TDM Plantation Sdn Bhd has established Flowchart for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders. Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	Managers was appointed as officer to handle social issue by Human Resource Department. Letter of appointment dated 1/11/2012 was sighted. Complied
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that 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 -	Records of communication with stakeholders were sighted. Most of them are related to request for assistance such as donation of gift for PIBG meeting, request for transportation to send students to other school for competition purpose and etc. The management has responded and provided with assistance. The mill and estates have developed the stakeholder list which included all relevant stakeholders such as local communities, government authorities, contractors and suppliers and etc. Stakeholder meeting was conducted on 18/6/2017 for whole Kemaman Complex with stakeholders such as local communities, managers from other estates, workers' representatives, school representatives and etc. Issues raised during the stakeholders was explained in the meeting and unresolved issue has incorporated into the Social Action Plan to monitor. Complied
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.		
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 -	TDM Plantation Sdn Bhd has established a flowchart on handling social issue. Two way communication was the method been utilized by the management. The management has to discuss the issue raised by stakeholders within 2 weeks for the first meeting. Complied

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6.3.2 Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	<p>The mill management has implemented House Maintenance Records to record any complaints related to housing by the workers. For eg: roof was leaking, water pipe broken and etc. The management has taken action to rectify the problem. Interviewed with the workers’ representatives confirmed that the management has repaired the issues raised by them.</p> <p>Air Putih Estate and MAIDAM Estate have implemented Complaint Form for external and internal to report if there is any issues. Most of the complaints were related to housing issues such as flooring inside the room was cracked, water piping broken and etc. Immediate action was taken to repair and rectify the problems. Interviewed with the workers confirmed that the repair work has been carried out immediately after they lodged the complaints.</p>	Complied
<p>Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>		
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 -	TDM Plantation Sdn Bhd has established Procedures for Handling Boundaries Disputes and Procedures for Handling Squatters Disputes. SOP of Calculating and Distributing Fair Compensation, Doc. No.: TDMP/SOP-ESTATE/01, Rev No.: SOP ESTATES/REV 00, Effective Date: 1/1/2017 was established by the Head Office. The objectives of the procedure is to provide guideline to SOU on how to compensate any land disputes and ensure proper practices of compensation. The compensation can be settled by mutual agreement or refer to District Land Department to value the land on dispute. If the consultation process failed, higher authority and resurvey shall be conducted. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
6.4.2 A procedure for calculating and distributing fair compensation (monetary or otherwise) 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 -	SOP is as per in 6.4.1 above.	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land between the local communities.	Complied
Criterion 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	Documentation of pay and conditions shall be available. - Major compliance -	<p>Mill and estate have employed local and foreign workers. All the mill and estates workers are under direct and contract employment. The payslip has included basic wage, allowances, normal working days, medical leave, holiday pay, deduction of salary such as NUPW, electricity, EPF and etc. Payslip for January 2017, May 2017 and June 2017 based on the crop summary was sampled as below:</p> <ul style="list-style-type: none"> a. Employee No.: KM1400199 (KPOM) b. Employee No.: KM1200175 (KPOM) c. Employee No.: KM00048 (KPOM) d. Employee No.: KM00022 (KPOM) e. Employee No.: AP1401092 (APE) f. Employee No.: AP0900533 (APE) g. Employee No.: AP1100708 (APE) h. Employee No.: AP1501121 (APE) i. Passport No.: B1401400 (APE's Contract Worker) j. Passport No.: B1400848 (APE's Contract Worker) k. Passport No.: AT822899 (APE's Contract Worker) l. Employee No.: MA0800053 (MAIE) m. Employee No.: MA1200257 (MAIE) n. Employee No.: MA00003 (MAIE) o. Employee No.: MA1100208 (MAIE) p. Employee No.: MA1600385 (MAIE) <p>All the sampled workers have achieved the Minimum Wage Order 2016 of RM 1000/ month or RM 38.46/day.</p> <p>The NUPW subscription fees was RM 8 by the workers and RM 3 subsidized by the management. The mill management has applied permit for deduction of water and electricity from the salary. The permit with Series No.: PMT.2010/020 which valid from 15/6/2010 is sighted.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.2</p> <p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p>	<p>The mill and estates have employed local and foreign workers under direct and contract employment. Employment contract and offer letters are available in language that understood by workers. The contract has detailing the payments and employment conditions such as period of working, working hour, medical assistance, holiday and annual leave, period of notice and etc. All the terms and conditions stated in the contract and offer letters were standardized among local and foreign workers. Sampled of the workers' employment contracts and offer letters as below:</p> <ul style="list-style-type: none"> a. Employee No.: KM1100167 (KPOM) b. Employee No.: KM1200175 (KPOM) c. Employee No.: KM1400199 (KPOM) d. Employee No.: AP1501121 (APE) e. Employee No.: AP1401078 (APE) f. Employee No.: AP1601158 (APE) g. Employee No.: AP1601161 (APE) h. Passport No.: B1401400 (APE's Contract Worker) i. Passport No.: AT102565 (APE's Contract Worker) j. Passport No.: AT102474 (APE's Contract Worker) k. Passport No.: AT746284 (APE's Contract Worker) l. Employee No.: MA1600385 (MAIE) m. Employee No.: MA1600390 (MAIE) n. Employee No.: MA1100208 (MAIE) <p>The mill workers have signed on the acknowledgement letter in order to work overtime more than 104 hours as requested by Labour Department Kemaman.</p>	<p>Complied</p>
<p>6.5.3</p> <p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p>- Minor compliance -</p>	<p>Linesite inspection was carried out on weekly basis by HA and Assistant Manager in the mill and estates. Weekly Linesite Inspection form was utilized during linesite inspection. Medical facilities were provided for the workers and the dependents without any charges. Transportation to send children to neighbouring school was provided as well. Subsidy of RM 6 for water and RM 5 for electricity was given by the management.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	Accesses to food for the workers are considered adequately and sufficiently. There are sundry shops and restaurants within the vicinity and access to the nearby township is available.	Complied
Criterion 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 -	TDM Plantation Sdn Bhd has implemented Freedom of Association Policy dated 1/6/2017. The workers were able to join or form any association according to the Employment Act without any restriction. Besides, they also implemented Social Policy dated 1/6/2017 where they workers are allowed to join and form association freely. Interviewed with the workers confirmed that they are allowed to join NUPW without any restriction.	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Kemaman POM, Air Putih Estate and MAIDAM Estate: Meeting with main trade unions or workers representatives has yet to be conducted. Thus, a minor non-conformance was raised.	Minor nonconformance
Criterion 6.7: Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	TDM Plantation Sdn Bhd has developed Protection of Children Policy dated 1/6/2017. They are committed not to exploit or recruit any individual less than 16 years old in the plantations. Through document reviewed on the Employee Listing confirmed that the workers recruited are above 18 years old.	Complied
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	TDM Plantation Sdn Bhd has developed Social Policy dated 1/6/2017 where they are committed to treat all the workers equally during the recruitment and promotion process without discrimination based on nationality, race, ethnic, religion, sexual orientation, age and etc.	Complied
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 -	Through document reviewed on the list of employees found that the workers consisted of local and foreign workers, male and female workers. The management treated all the workers fairly and equally without any discrimination. No discrimination was sighted based on interview with the workers. Through interviewed with the head of local village confirmed that the management has recruited local workers as employees.	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	TDM Plantation Sdn Bhd has developed a Procedure on Foreign Workers Recruitment, revision May 2017. The procedure has detailed the process of recruitment was conducted by Human Resource Department of TDM Berhad. Only workers with valid legal documentation will be recruited.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	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 -	TDM Plantation Sdn Bhd has developed Gender Policy dated 1/6/2017 where they are responsible to ensure the workplaces are free from any harassment related to sexual, religion, nationality and etc. The policy has been displayed at the notice board in front of office.	Complied
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 -	TDM Plantation Sdn Bhd has implemented Reproductive Policy dated 1/6/2017. The management will not control on the reproductive rights of women and they are allowed to seek for advice from any parties for the planning of give birth. The policy has been displayed at the notice board in front of office.	Complied
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	TDM Plantation Sdn Bhd has established flowchart for handling Sexual Harassment complaint in workplace. The management is required to investigate within 2 days from the date of receiving the complaints. Gender Committee was established to monitor any issues related to women in workplace. Meeting was conducted to discuss issues and the last meeting was conducted on 9/3/2017 in Mill, 20/3/2017 and 18/7/2017 in Air Putih Estate, 26/2/2017 and 11/7/2017 in MAIDAM Estate. No case of sexual harassment or violence was reported. Interviewed with the female workers confirmed that no case was reported. The committee has conducted activities such as gotong-royong at the compound of mosque, dinner together with all the employees and families, aerobic exercise for female workers, bowling competition and etc.	Complied
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Kemaman palm oil mill process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.	Complied
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 (where these are under the control of the mill or plantation). - Major compliance -	Kemaman palm oil mill process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.	Complied
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 -	Contractors' agreement were sampled as below: a. Contractor: Chong Trading for transporting CPO and Palm Kernel which valid from 1/1/2017 – 31/12/2017. b. Order No.: AP 002/17 for road grading and culvert construction which valid from 1/1/2017 – 31/12/2017. c. Order No.: IP 68/18 for replanting work which valid until 16/4/2017 and extended until 31/10/2017 upon written request to the management. Terms and conditions were clearly stated in the agreement.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	The payment terms were clearly stated in the agreement where TDM Plantation Sdn Bhd will made payment within 14 days from the date of received invoice from contractors. Interviewed with contractors confirmed that the payment was made promptly.	Complied
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	The mill and estates have made contribution to the stakeholders such as donation of gift for PIBG meeting, transportation to send students to other school for competition purpose, provided labour assistance during flooding period, borrow backhoe for the local communities, donation for school’s sport day and etc. Besides, the estates have subsidized RM 6 for water bill and RM 5 for electricity bill for the workers.	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	No scheme smallholder involved in the Kemaman Certification Unit.	Not applicable
Criterion 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 -	TDM Plantation Sdn Bhd has developed Social Policy dated 1/6/2017 where they are committed to confront to forced labour and child labour. TDM Plantation Sdn Bhd has recruited all the employees with legal identification for local and valid passport and work permit for foreign workers. Contract of employment was signed by the workers prior to work. Sampled of foreign workers with valid work permit as below: <ul style="list-style-type: none"> a. Permit No.: PD 6983750 valid until 13/12/2017 (APE) b. Permit No.: PD 7163366 valid until 15/1/2018 (APE) c. Permit No.: PD 3458092 valid until 18/8/2017 (APE) d. Permit No.: PD 8048752 valid until 24/5/2018 (APE) e. Permit No.: PD 6578869 valid until 14/10/2017 (APE’s Contract Worker) f. Permit No.: PD 7383191 valid until 15/1/2018 (APE’s Contract Worker) g. Permit No.: PD 8363756 valid until 26/6/2018 (APE’s Contract Worker) h. Permit No.: PD 6413727 valid until 2/9/2017 (MAIE) i. Permit No.: PD 8130390 valid until 3/7/2018 (MAIE) j. Permit No.: PD 7548987 valid until 14/4/2018 (MAIE) k. Permit No.: PD 8353385 valid until 3/7/2018 (MAIE) Consent letter of passport retention acknowledged by the workers were sighted and sampled as below: <ul style="list-style-type: none"> a. Passport No.: AT545163 (APE) b. Passport No.: AS654384 (APE) c. Passport No.: B0499143 (APE) d. Employee No.: MA0800053 (MAIE) e. Employee No.: MA1600385 (MAIE) f. Employee No.: MA1300313 (MAIE) 	Complied

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6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	Interviewed with the foreign workers confirmed that no contract substitution has occurred. The terms and condition of contract they have signed prior to Malaysia and signed in the plantations were same as no contradiction of contract happened.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	TDM Plantation Sdn Bhd has developed Code of Ethical Conduct Policy dated 1/8/2017. The policy has stated the following criteria as below: a. Recruit the suitable workers. No child labour or forced labour being practice. b. Provide decent living conditions and working condition. c. Provide induction training prior work. d. Equal opportunity to all the workers. e. Freedom to form or join any association. f. No contract substitution for the workers g. And etc.	Complied
Criterion 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 (see Criteria 1.2 and 2.1). - Major compliance -	TDM Plantation Sdn Bhd has implemented Human Rights Policy dated 1/6/2017. The management is committed to support the principle of Universal Declaration of Human Rights and ILO Core Convention on Labour Standards. They evaluated and managed the human rights activities parallel to the policy such as workers, contractors and suppliers, local communities and etc. The policy was displayed at the notice board in front of office and canteen area.	Complied
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.	Not applicable for Kemaman Certification Unit.	Not applicable
Principle 7: Responsible development of new plantings Kemaman Palm Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance assessment. The immature areas are replanted area.			
Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 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.			

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Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>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.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>Continuous improvement plan for POM FY2016/2017. It cover the welfare and the operation aspect. For example:</p> <ol style="list-style-type: none"> a. Provide additional housing blocks b. Installing new water filtration system c. Building a new BioCompost Plant d. Install CCTV for ensuring the safety of all workers. 	<p>Complied</p>

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Appendix B: Approved Time Bound Plan

No	Name of the Estate and Mills	TBP for certification	Status as Aug, 2016	Any unresolved (Labour Disputes/Land conflicts/Legal Non-Compliance etc.)	
1	TDM Plantation Sdn. Bhd. Tebak Estate , Kemaman, Terengganu, Malaysia	Supply base for TDM Plantation Sdn. Bhd. Kemaman Palm Oil Mill, Kemaman, Terengganu, Malaysia.	Nov, 2013	Certified	None
2	TDM Plantation Sdn. Bhd. Pelantoh Estate , Kemaman, Terengganu, Malaysia		Nov, 2013	Certified	None
3	TDM Plantation Sdn. Bhd. Jernih Estate , Kemaman, Terengganu, Malaysia		Nov, 2013	Certified	None
4	TDM Plantation Sdn. Bhd. Air Putih Estate , Kemaman, Terengganu, Malaysia		Nov, 2013	Certified	None
5	TDM Plantation Sdn. Bhd. Gajah Mati Estate, Dungun, Terengganu, Malaysia		Nov, 2013	Certified	None
6	TDM Plantation Sdn. Bhd. MAIDAM Estate, Dungun, Terengganu, Malaysia		Nov, 2013	Certified	None
1	TDM Plantation Sdn. Bhd. Tayor Estate, Setiu, Terengganu, Malaysia	Supply base for TDM Plantation Sdn. Bhd. Sungai Tong Palm Oil Mill, Setiu, Terengganu, Malaysia.	Dec, 2013	Certified	None
2	TDM Plantation Sdn. Bhd. Pelong Estate , Setiu, Terengganu, Malaysia		Dec, 2013	Certified	None
3	TDM Plantation Sdn. Bhd. Jaya Estate , Setiu, Terengganu, Malaysia		Dec, 2013	Certified	None
4	TDM Plantation Sdn. Bhd. Fikri Estate , Setiu, Terengganu, Malaysia		Dec, 2013	Certified	None
5	TDM Plantation Sdn. Bhd. Pinang Emas Estate, Dungun, Terengganu, Malaysia		Dec, 2013	Certified	None
6	TDM Plantation Sdn. Bhd. Jerangau Estate, Ajil, Terengganu, Malaysia		Dec, 2013	Certified	None

Appendix C: Certification Unit RSPO Certificate Details

TDM Plantation Sdn. Bhd.
Kemaman Palm Oil Mill
KM 121, Jerangau – Jabor Highway
24101 Kemaman
Terengganu, Malaysia
RSPO membership number: 1-0095-11-000-00

BSI RSPO Certificate No. : RSPO 587626
Date of Initial Certificate Issued: 01/11/2013
Date of Expiry: 31/10/2018
Applicable Standards: RSPO P&C MYNI-2014; RSPO Supply Chain Certification Standard November 2014 Module D – CPO Mills: Identity Preserved)

Kemaman Palm Oil Mill and Supply Base					
Location Address	Kemaman Palm Oil Mill, KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia				
GPS Location	103° 14' 52.8"E ; 4° 24' 10.80" N				
CPO Tonnage Total	45,358.30 mt				
PK Tonnage Total	11,063.00 mt				
CPO Claimed for Certification*	45,358.30 mt				
PK Claimed for Certification *	11,063.00 mt				
Own estates FFB Tonnage	221,260.00 mt				
Scheme Smallholder FFB Tonnage	-				
Estates	Production Area		Other use (ha)	Certified Area / Total land lease (ha)	Annual FFB Production (mt)
	Mature (ha)	Immature (ha)			
Jernih	2,416.67	405.40	326.36	3,148.43	42,300.00
Tebak	2,357.94	327.92	370.87	3,056.73	51,430.00
Pelantoh	3,003.78	138.20	149.62	3,291.60	54,000.00
Air Putih	3,035.89	1,006.81	309.28	4,351.98	35,450.00
MAIDAM	500.16	255.80	151.38	907.34	6,780.00
Gajah Mati	2,063.53	1,457.34	361.91	3,882.78	31,300.00
TOTAL	13,377.97	3,591.47	1,669.42	18,638.86	221,260.00

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Appendix D: Assessment Plan

Date	Time	Subjects	Hoo Boon Han	Isman	Hu Ning Shing
Monday 31/07/2017	PM	Audit Team travelling to Terengganu	√	√	√
Tuesday 01/08/2017	0830-0900	Opening meeting (Kemaman POM) • Opening presentation by Team Leader • Confirmation of assessment scope and finalize audit plan; previous CAR verification	√	√	√
	0900-1200	Kemaman Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	√
	1100-1200	Supply chain for CPO mill, weighbridge officer, production record and etc	√	-	-
	1200-1300	Lunch	√	√	√
	1300-1630	Kemaman Palm Oil Mill: Document Review P1 – P8: SOPs, Supply chain for CPO mill, SCCS, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√
	1630-1700	Interim Closing briefing	√	√	√
Wednesday 02/08/2017 Air Putih Estate	0900-1100	Air Putih Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
	1100-1200	Meeting with stakeholders (Government, village rep, smallholders, workers leader, contractor etc.)	√	√	√
	1200-1300	Lunch	√	√	√
	1300-1630	Air Putih Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√

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Date	Time	Subjects	Hoo Boon Han	Isman	Hu Ning Shing
	PM	Interim Closing briefing	√	√	√
Thursday 03/08/2017 MAIDAM Estate	0900-1100	MAIDAM Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
	1100-1200	Meeting with stakeholders (Government, village rep, smallholders, workers leader, contractor etc.)	√	√	√
	1200-1300	Lunch	√	√	√
	1330-1530	MAIDAM Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1530-1600	Verify any outstanding issues & Preparation for closing Meeting	√	√	√
	1600-1700	Closing meeting	√	√	√
Friday 04/08/2017	AM	Audit Team traveling back to KL	√	√	√

Appendix E: Stakeholders Contacted

<p>Internal Stakeholders Managers and Assistant Managers Staff and Clerks Foreign Workers Gender Committee Chairman Field workers</p>	<p>Union/Contractors/Local Communities NUPW representatives</p>
<p>Government Departments</p>	<p>NGO</p>

Appendix F: CPO Mill Supply Chain Assessment Report (Module D - CPO Mills: Identity Preserved)

Requirements	Compliance
D.1 Definition	
<p>D.1.1 A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C). Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.</p>	<p>KPOM only receives certified FFB therefore it qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p>
D.2 Explanation	
<p>D.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>
<p>D.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>
D.3 Documented procedures	
<p>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.</p>	<p>Latest written documented procedures (No. TDM/KPOM/01Rev.01/2015) Dated 01/09/15) for the chain of custody is with Identity Preserved (IP) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and noncertified FFB. This developed based on the RSPO SCCS 21 November 2014. The previous SOP was for SG. The mill manager has the responsibility to ensure implementation assisted by the on-site compliance executive. The IP model is used because only certified FFB from own supply base and adjacent certified estates are received and processed at Kemaman Palm Oil Mill.</p> <p>The mill manager and assistant manager have awareness of the supply chain system. The manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements</p>
<p>D.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>KPOM has documented procedures (as per above in D.3.1) for the incoming FFB, processing and outgoing palm products (CPO and PK). The procedure covers receiving and processing certified and non-certified FFBs.</p>
D.4 Purchasing and goods in	
<p>D.4.1 The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p>	<p>Similar to last assessment, daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit. KPOM</p>

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	<p>have system to verify at the weighbridge. Crop diversion from other certified estate under TDM plantation checked.</p> <p>Sample of weighbridge ticket for incoming crop from their own estate:</p> <p><u>Pelantoh Estate</u> Supplier ID: 110-LPN, docket# P0196994 dated 31/7/17, Field 92b2, vehicle # TAV3624, weight: 7,900 kg</p> <p><u>Tebak Estate</u> Supplier ID: 110-LTB, docket# P0196467 dated 23/07/17, Field PM95A3, vehicle # TBD1755, weight : 7,010 kg</p> <p><u>Air Putih Estate</u> Supplier ID: 110-LAP, docket# P0197030 dated 31/10/17, Field 14D1, vehicle # TAK4371, weight : 5,700 kg</p> <p><u>Gajah Mati Estate</u> Supplier ID: 110-LGM, docket# P0191335 dated 09/05/17, Field 14D1, vehicle # TAK4371, weight : 5,700 kg</p>
<p>D.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>	<p>The facilities aware of this procedure.</p>
<p>D.5 Record keeping</p>	
<p>D.5.1 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.</p>	<p>All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. Computerized system is in place. No PKO and Palm Kernel Cake at Kemaman Palm Oil mill. Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the FFB received. Records of certified FFB received verified during annual surveillance. Records verified by internal and external audit.</p>
<p>D.6 Processing</p>	
<p>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.</p>	<p>During this assessment it was confirmed that only certified source of FFB from own plantation is processed. This ensures that there is no possibility of mixing during processing.</p>
<p>D.6.2 The objective is for 100 % segregated material to be reached.</p>	<p>Processing and storage records can trace back to only certified segregated FFB and finish product (CPO and PK) through traceability records such as weighbridge records. This ensures that 100% segregated materials are reached.</p>

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Actual Tonnage Certified Palm Production – Sept 2016 – August 2017 (ASA4)

Mill	Capacity	CPO	PK
Kemaman Palm Oil Mill	60 MT/hr	44,255.88 mt	11,793.10 mt

Actual Tonnage Sales of Certified Palm Products – Sept 2016 – August 2017 (ASA4)

Mill	Certified CPO Sales	Certified PK Sales	Remarks
Kemaman Palm Oil Mill	40,533.53 mt	5531.51 mt	Verified from Palm Trace records.

Actual Tonnage Sales of Certified Palm Products (under other Scheme) - Sept 2016 – August 2017 (ASA4)

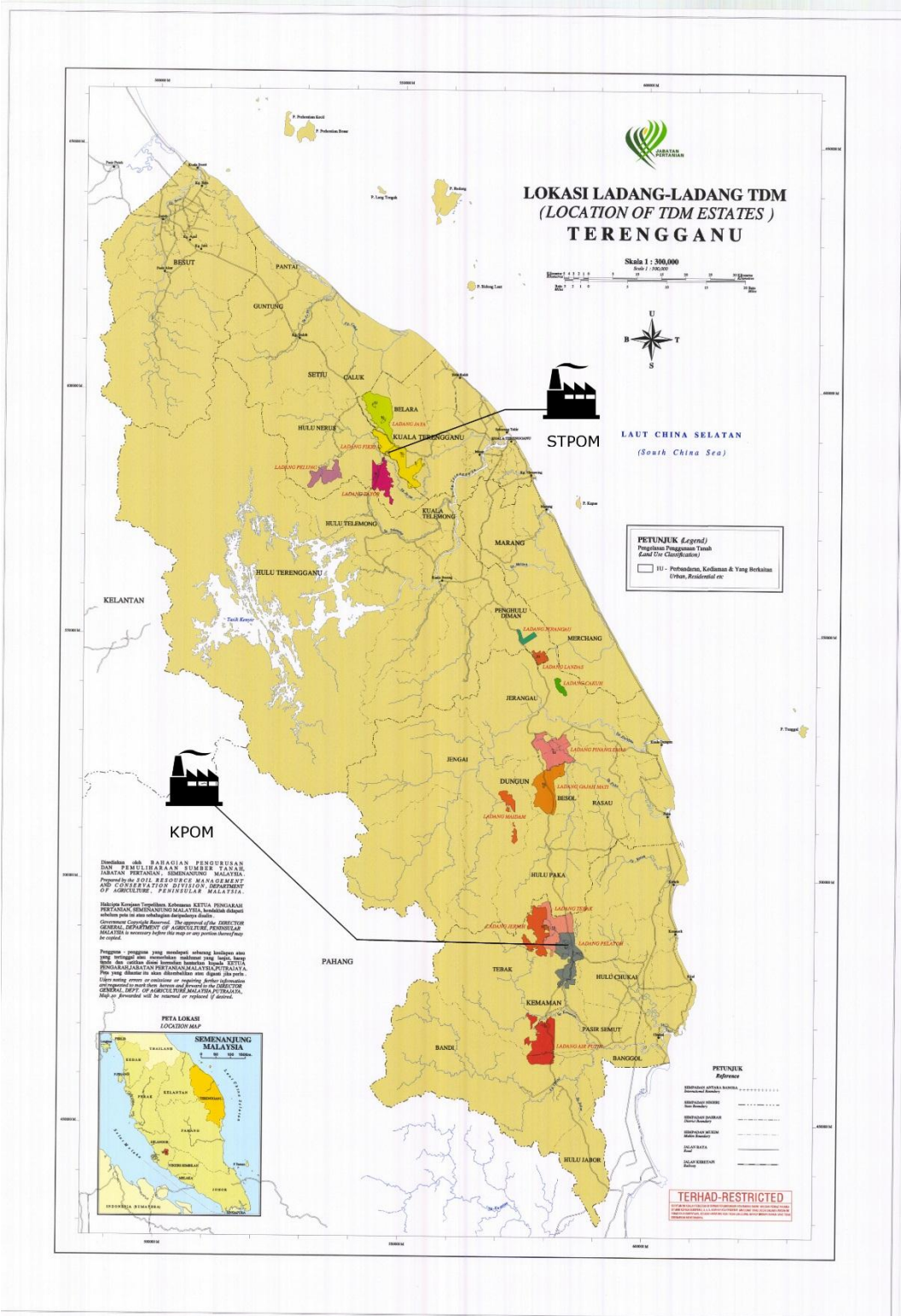
Mill	Certified CPO Sales	Certified PK Sales	Remarks
Kemaman Palm Oil Mill	0	0	No sale of certified palm products in other scheme.

Actual Tonnage Sales of Conventional Palm Products - Sept 2016 – August 2017 (ASA4)

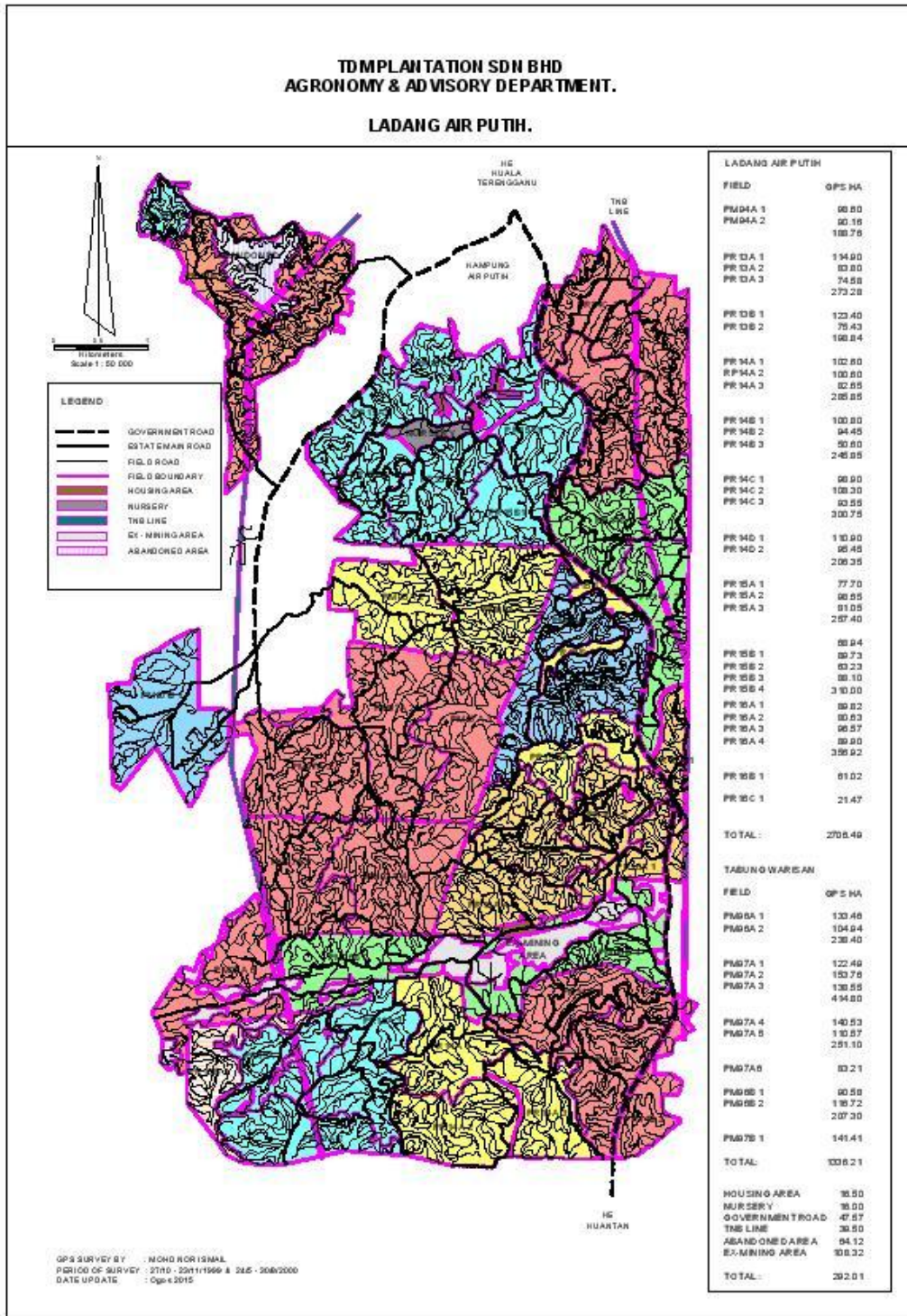
Mill	Certified CPO Sales	Certified PK Sales	Remarks
Kemaman Palm Oil Mill	6,220.44 mt	10,382.22 mt	

Month	TDM Kemaman POM							Total FFB/Month (mt)
	Pelantoh Estate	Tebak Estate	Jernih Estate	Air Putih Estate	Gajah Mati Estate	MAIDAM Islam	Others (Sg. Tong CU)	
Sep2016	3,589.82	3,040.80	4,349.74	2,554.62	2,050.10	502.37	3,683.15	19,770.60
Oct 2016	4,545.54	4,205.73	4,821.00	2,605.83	2,564.20	603.10	4,254.78	23,600.18
Nov 2016	4,313.90	4,486.32	4,312.77	2,917.13	2,187.27	538.73	3,442.02	22,198.14
Dec 2016	4,663.38	4,550.15	3,840.70	2,871.83	2,065.78	418.82	3,489.09	21,899.75
Jan 2017	4,294.20	3,763.04	2,666.90	2,722.73	1,811.15	377.58	3,010.78	18,646.38
Feb 2017	4,209.62	3,091.62	2,090.45	1,950.42	1,645.79	255.02	2,770.54	16,013.46
Mar 2017	3,970.97	3,235.61	2,227.82	2,054.49	1,722.22	301.00	2,258.28	15,770.39
Apr 2017	4,437.97	3,974.63	2,619.46	2,665.05	2,011.73	429.31	2,422.47	18,560.62
May 2017	4,868.97	4,088.88	2,719.68	3,094.17	2,039.93	465.64	2,559.90	19,837.17
Jun 2017	3,007.20	2,888.35	2,313.35	2,264.78	1,378.86	312.00	2,440.50	14,605.04
Jul 2017	4,738.39	3,797.36	3,167.10	2,682.67	2,158.59	336.12	3,435.10	20,315.33
Aug 2017	4,072.73	3,808.20	3,969.65	3,106.96	2,108.44	321.40	3,164.78	20,552.16
Total	50,712.69	44,900.69	39,098.62	31,490.68	23,744.06	4,861.09	36,931.3	231,769.22

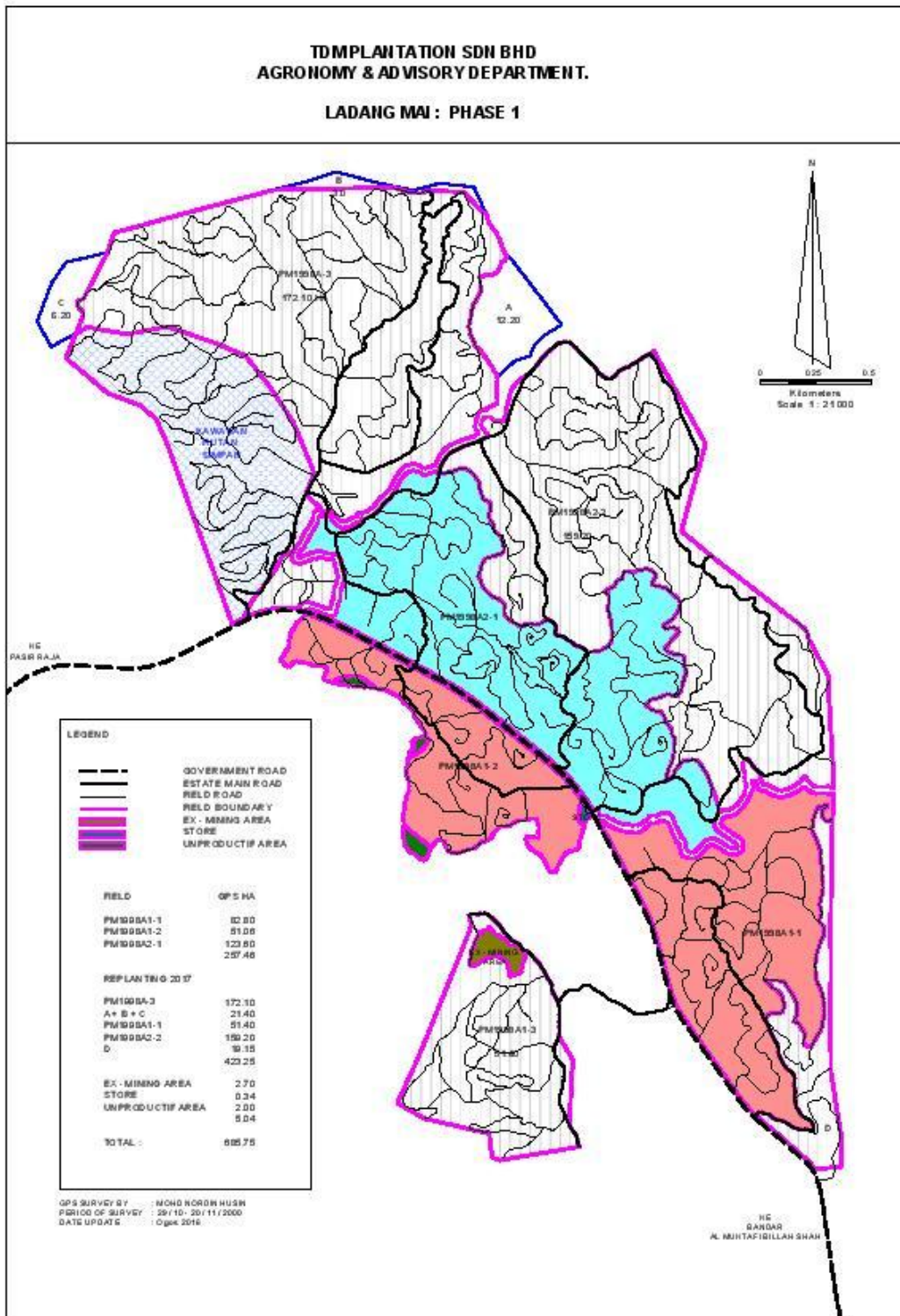
Appendix G: Location Map of Kemaman Palm Oil Mill and Supply bases



Appendix H: Air Putih Estate Field Map

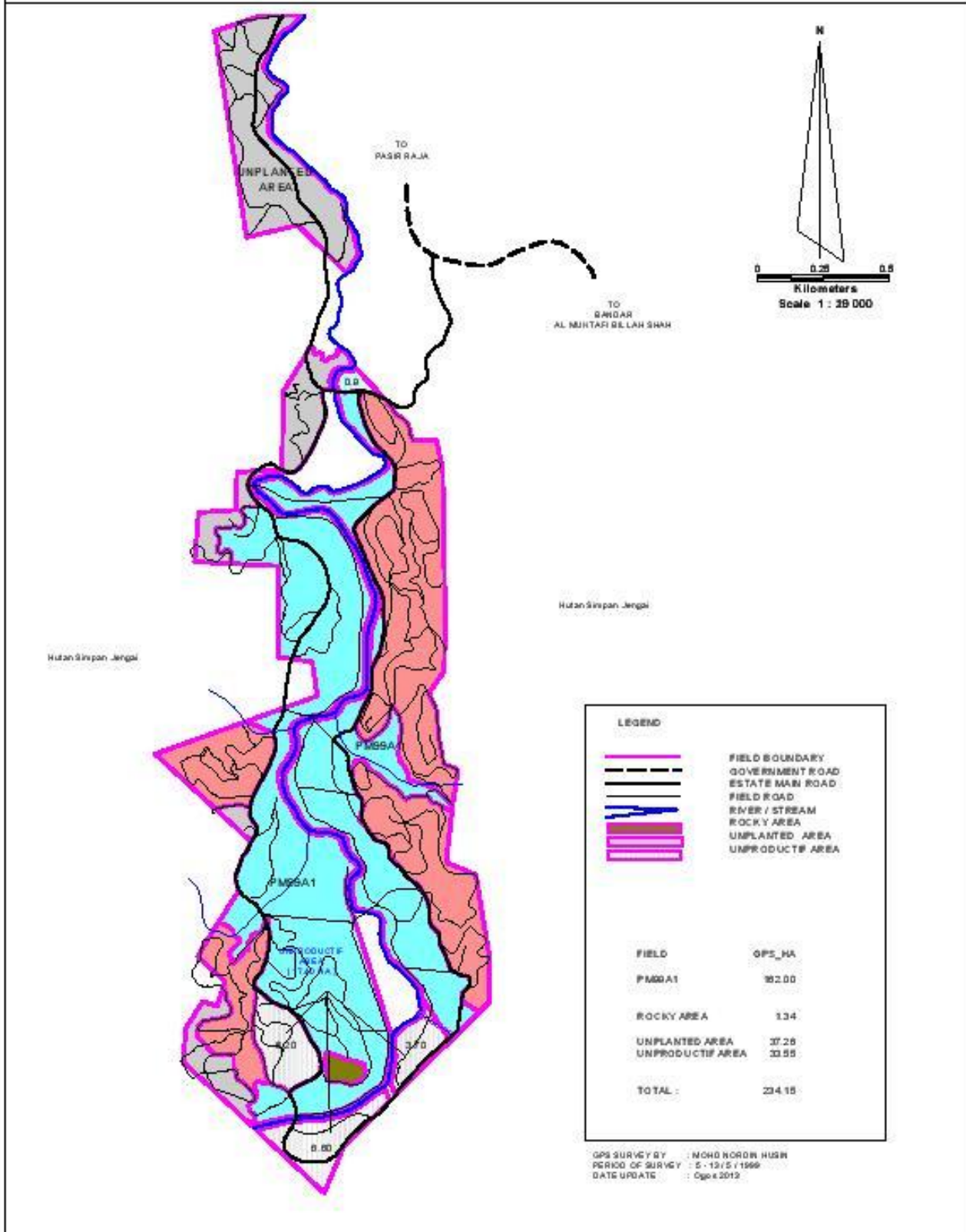


Appendix I: MAIDAM Estate Field Map



**TD M PLANTATION SDN. BHD.
AGRONOMY & ADVISORY DEPARTMENT.**

LADANG MAI: PHASE 2



Appendix J: List of Smallholder Sampled

(Not applicable)

Appendix K: GHG Reporting Executive Summary

The GHG emissions that were produced in 2016 for Kemaman Palm Oil Mill and supply base was calculated using the GHGpalm Calculator version 3.0. The assessment team had verified the data input in the GHGpalm Calculator against operations records. Palm GHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in 2016 for Kemaman Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.24
PKO	0.24

Extraction	%
OER	23.94
KER	6.18

Production	t/yr
FFB Process	169,141.65
CPO Produced	40,488.59
PKO Produced	10,459.58

Land Use	Ha
OP Planted Area	16,452.77
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	404.64
Total	16,857.41

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	66,019.54	0.39	0	0	0	0	66,019.54	0.39
CO ₂ Emission from fertilizer	5,240.24	0.03	0	0	0	0	5,240.24	0.03
NO ₂ Emmision	4,098.96	0.02	0	0	0	0	4,098.96	0.02
Fuel Consumption	888.02	0.01	0	0	0	0	888.02	0.01
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-63,467.73	-0.38	0	0	0	0	-63,467.73	-0.38
Conservation Sequestration	-1,564.12	-0.01	0	0	0	0	-1,564.12	-0.01
Total	11,214.91	0.06	0	0	0	0	41,356.68	0.21

*Note: Includes both estates and smallholders

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Summary of Mill Emission and Credit

	tCO _{2e}	tCO _{2e} /tFFB
Emission		
POME	0	0
Fuel Consumption	878.16	0.01
Grid Electricity Utilisation	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	878.16	0.01

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO_{2e}
PK from own mill	2,485.69
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	100
Divert to anaerobic diversion (%)	0

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix L: List of Abbreviations Used

ASA	Annual Surveillance Assessment
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CIP	Continual Improvement Plan
CPO	Crude Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EIA	Environmental Impact Assessment
EMS	Environmental Management System
ERP	Emergency Response Plan
FFB	Fresh Fruit Bunch
GME	Gajah Mati Estate
HCV	High Conservation Value
HIRARC	Hazard Identification, Risk Assessment and Risk Control
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
JE	Jernih Estate
KPOM	Kemaman Palm Oil Mill
MAIDAM	Majlis Agama Islam Estate
MPOA	Malaysian Palm Oil Association
MSDS	Material Safety Data Sheet
MSPO	Malaysian Sustainable Palm Oil
MY-NI	Malaysian National Interpretation
NGO	Non Governmental Organisation
OSH	Occupational Safety & Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
PPE	Personal Protective Equipment
RED	Renewable Energy Directive
RSPO	P&C Roundtable on Sustainable Palm Oil Principle & Criteria
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SHO	Safety and Health Officer
SIA	Social Impact Assessment
SOP	Standard Operating Procedure