

# GLOBAL GATEWAY CERTIFICATIONS

## MALAYSIAN SUSTAINABLE PALM OIL (MSPO)



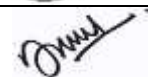
### CERTIFICATION AUDIT REPORT


#### Part 4 : General Principles for Palm Oil Mills

Sime Darby Plantation Berhad  
Kok Foh Palm Oil Mill

-Individual Certification-

ANNUAL SURVEILLANCE AUDIT 03  
22<sup>nd</sup> October 2020

Revision History					
Rev	Date	Description	Performed by	Role	Signature
A	18/11/2020	Issued as Draft Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	
B	10/12/2020	Issued as Final Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	
B	20/12/2020	Final Report Approved	Md. Jefri bin Sharaai	Certifier	

Acknowledgment by Sime Darby Plantation Berhad					
Rev	Date	Description	Management Representative	Role	Signature
B	20/12/2020	Acceptance of the contents	Mr. Abdul Halim bin Shahor	SOU Chairman	

#### Declaration

The auditor(s) has (had) no personal, business or other ties to the client and the assessment is carried out objectively and independently.

WITH INTEGRITY WE SERVE



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Note: Section II of this report contain confidential information and been protected from public disclosure.

**SECTION I : PUBLIC SUMMARY REPORT****1.1 Certification Scope**

Global Gateway Certifications Sdn. Bhd. (GGC) has conducted the Certification Assessment of Sime Darby Plantation Berhad – Kok Foh Palm Oil Mill. During this Annual Surveillance Audit (ASA 3), the audit team were briefed by sustainability member, of the supply base disposition. The source of FFB supplies to Kok Foh POM are from their own estates. Kok Foh POM also receiving certified FFB from other estates, out-growers and other smallholders.

This assessment was conducted onsite on 22<sup>nd</sup> October 2020 to assess the compliance of the certification unit against the "MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills". The scope of certification is "Production of Sustainable Crude Palm Oil and Palm Kernel".

**1.2 Company details and Contact information**

<b>Company Name</b>	Sime Darby Plantation Berhad
<b>Business Address</b>	Sustainability Unit, Group Sustainability & Quality Management, Level 5, Main Block, Plantation Tower, No 2 Jalan P.J.U 1A/7, 47301 Ara Damansara, Selangor, Malaysia.
<b>Contact Person</b>	Madam Shylaja Devi Vasudevan Nair
<b>Office Telephone</b>	+603 7848 4379
<b>E-Mail</b>	shylaja.vasudevan@simedarby.com

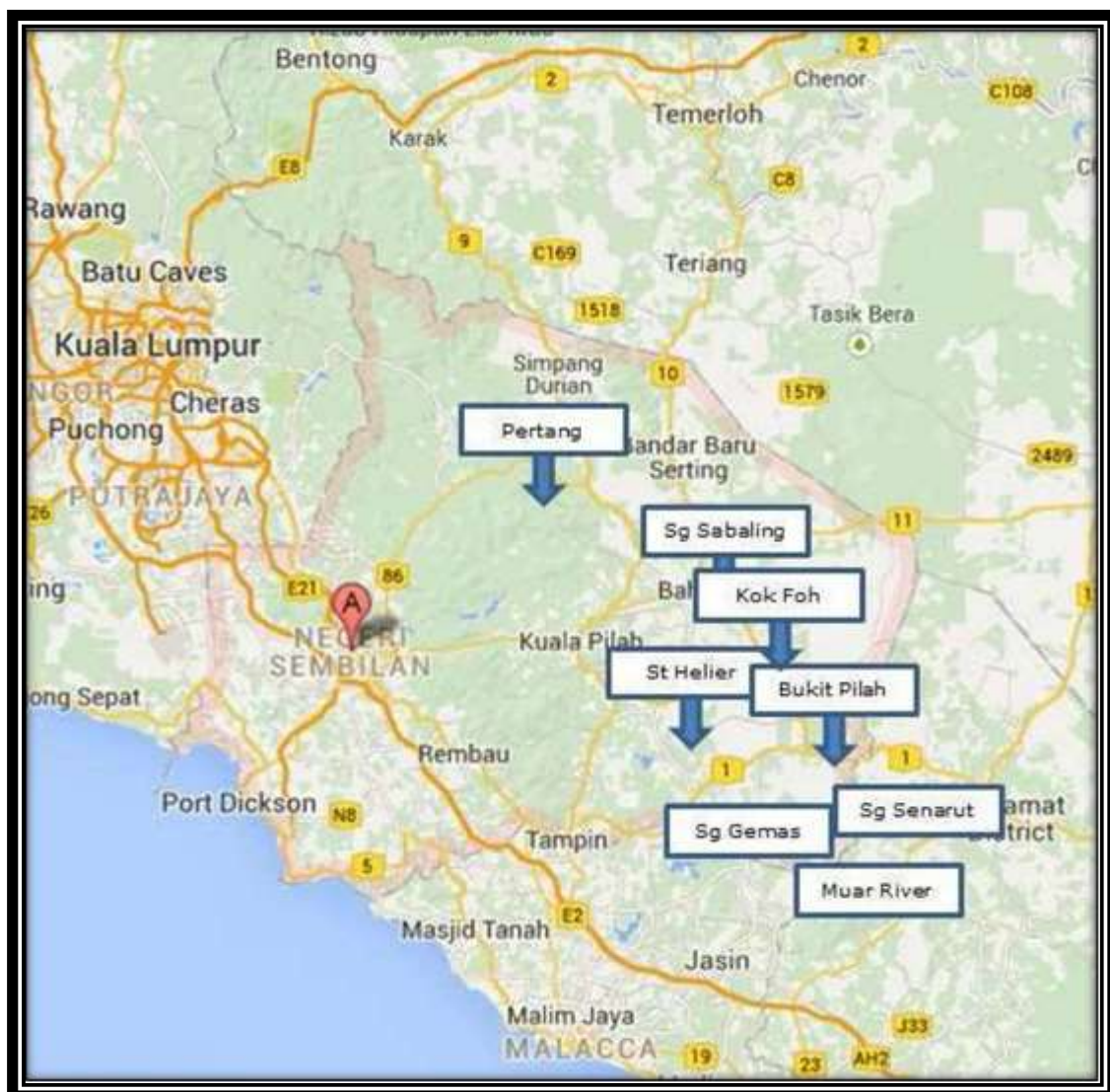
**1.3 Certification Unit**

<b>Name of the Certification Unit</b>	Kok Foh Palm Oil Mill				
<b>Mill Capacity (MT/HR)</b>	45				
<b>Site Address</b>	Kilang Kelapa Sawit Kok Foh, 72109 Bahau, Negeri Sembilan.				
<b>GPS Reference of the site office</b>	<table> <tr> <td><b>Longitude</b></td><td>E 102.50416</td></tr> <tr> <td><b>Latitude</b></td><td>N 2.7846667</td></tr> </table>	<b>Longitude</b>	E 102.50416	<b>Latitude</b>	N 2.7846667
<b>Longitude</b>	E 102.50416				
<b>Latitude</b>	N 2.7846667				

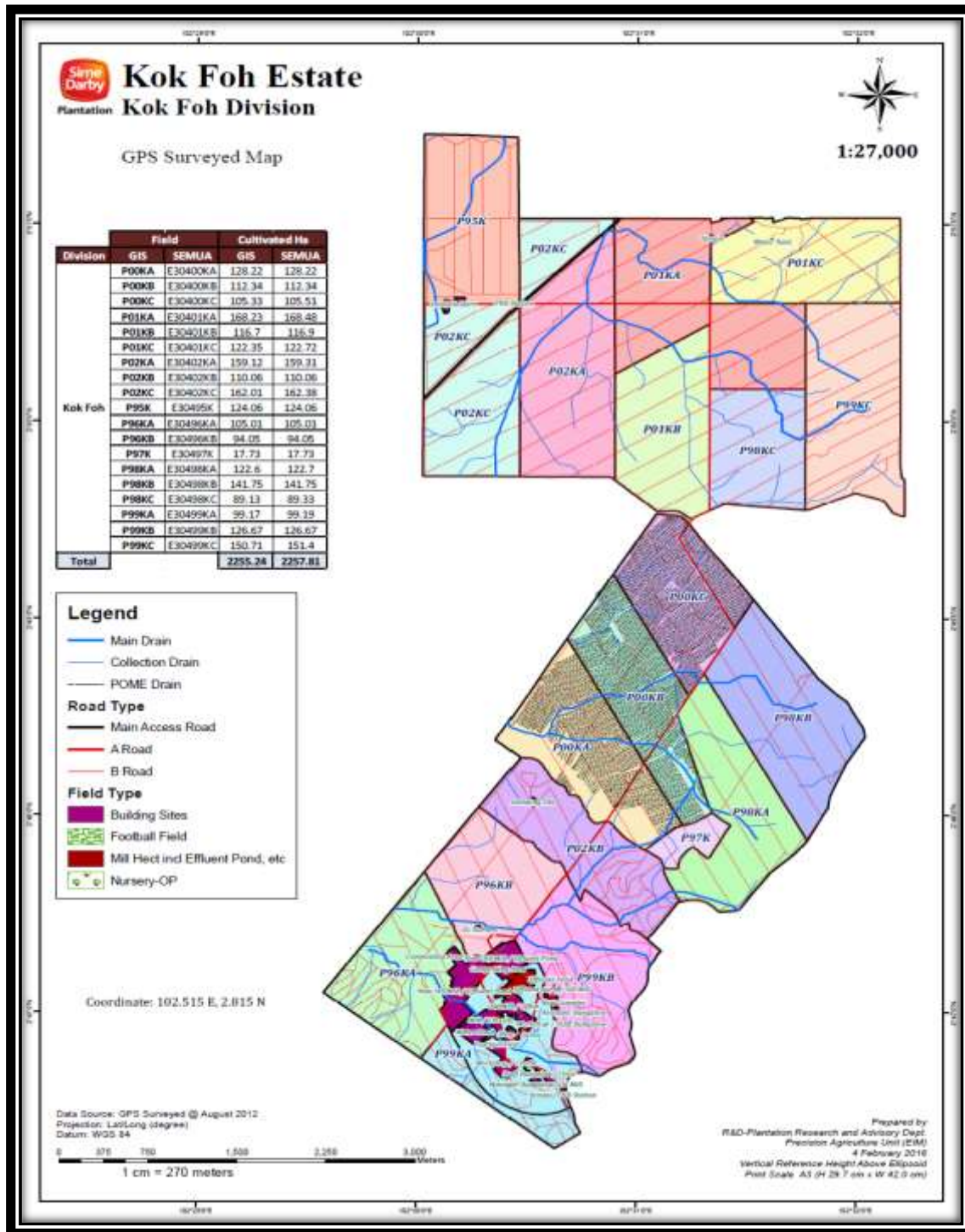
<b>MPOB License Information</b>	<b>License No.</b>	543656004000
	<b>Scope of Activity</b>	<ol style="list-style-type: none"> <li>1. "Menjual dan Mengalih –PK, CPO, SPO"</li> <li>2. "Membeli dan Mengalih – FFB"</li> <li>3. "Menyimpan – PK, CPO, SPO"</li> <li>4. "Mengilang FFB"</li> </ol>
	<b>Expiry Date</b>	31 <sup>st</sup> October 2020
<b>Others Sustainability Certification</b>		RSPO (Roundtable on Sustainable Palm Oil)

#### 1.4 Map Showing Geographical Location

##### 1) SOU 16 Kok Foh [Mill & Estates]



## 2) Kok Foh POM (Share with Kok Foh Estate Land Title)





**1.5 Production Area, Actual and Projected FFB Production (MT)****Production for Certified Unit**

<b>Kok Foh POM</b>	<b>Projected from last audit [Oct 2019-Sep 2020]</b>	<b>Actual Production for 12 Months [Oct 2019-Sep 2020]</b>	<b>Projected Production for next 12 Months [Oct 2020-Sep 2021]</b>
FFB Summary (MT)	145,000	109,643.29	130,000
CPO Summary (MT)	50,4000	21,971.10	27,601.32
PK Summary (MT)	7,2000	4,821.74	6,803.38

# FFB's Own Estate &amp; Certified Estates

**Production for Uncertified Unit**

<b>Kok Foh POM</b>	<b>Projected from last audit [Oct 2019-Sep 2020]</b>	<b>Actual Production for 12 Months [Oct 2019-Sep 2020]</b>	<b>Projected Production for next 12 Months [Oct 2020-Sep 2021]</b>
FFB Summary (MT)	Nil	68,063.15	Nil
CPO Summary (MT)	Nil	13,638.98	Nil
PK Summary (MT)	Nil	2,993.18	Nil

**1.6 Certificate Details****Certification body**

Global Gateway Certifications Sdn. Bhd.,  
No. 10 Jalan Rasmi 7, Taman Rasmi Jaya,  
68000 Ampang,  
Selangor Darul Ehsan, Malaysia.  
Tel.: +603 4256 2689; Fax: +603 4256 2687  
Website: [www.ggc.my](http://www.ggc.my)

**Assessment standard**

(MSPO) Part 4: General Principles for Palm Oil Mills

**Certificate number**

GGC-SDP002-MSPO-02-2018

**Initial certificate issued date**20<sup>th</sup> December 2017**Certificate expiry date**19<sup>th</sup> December 2022

<b>Stage 1 assessment date</b>	Not Applicable as client certified for RSPO.
<b>Stage 2 / Main Assessment</b>	6 <sup>th</sup> November 2017
<b>Annual Surveillance 1 [ASA 1]</b>	20 <sup>th</sup> November 2018
<b>Annual Surveillance 2 [ASA 2]</b>	10 <sup>th</sup> October 2019
<b>Annual Surveillance 3 [ASA 3]</b>	22 <sup>nd</sup> October 2020
<b>Annual Surveillance 4 [ASA 4]</b>	October 2021

## 1.7 Qualification of the Lead Assessor and Assessment Team

### Lead Auditor

**Name:** **Muhammad Syafiq bin Abd Razak**

Graduate in plantation management with more than 7 years working experience in various plantation company and skills in Good Agricultural Practices (GAP) including Integrated Pest Management (IPM). Fully trained in similar agriculture certification programs such as RSPO, SCCS, MSPO and etc. Qualified as Lead Auditor/Auditor in several certification programme. Involved in RSPO and MSPO assessment since 2014. Involved in audits conducted in for many different companies in Malaysia, Indonesia, Australia, Pakistan, India, Arab Saudi and Ivory Coast. Completed and certified MSPO Auditor course in 2014 (3<sup>rd</sup> Batch) held by MPOB. Member of GGC MSPO audit team.

Experienced in handling mineral and peat soil oil palm estate. Knowledgeable in chemical in control of weeds and pest & disease in Oil Palm Plantation sector. Understanding in Industrial relation and labour law. Attended OSH Act 1994 & Regulations and Factories & Machinery Act 1967 & Regulations Training. Participated in Workshop for Oil Palm Growers on Peat at Bogor, Indonesia. Completed and attended Social Impact Assessment Training at Bogor, Indonesia organized by Remark Asia. Also, has attended training for RSPO GHG calculation on year 2015 in Kuala Lumpur and Social Auditing Workshop on year 2019 in Melaka and conducted by Verite.

During this assessment, he assessed on the aspect of Transparency, Compliance to Legal Requirements, Stakeholder's Consultation and Workers Welfare, Best Practices and etc. He is able to speak and understand Bahasa Malaysia and English.

### Auditor

**Name:** **Ismadi bin Hj Ismail**

He holds Diploma in Planting Industry Management from MARA Institute of Technology, Kuantan Pahang. 24 years of working experiences with various plantation companies and skills in Best Agriculture Practices (GAP) for plantation. Fully trained in CoP, MSPO and OSHAS. Qualified as Lead Auditor/Auditor for MSPO and CoP. Involved in MSPO assessment since 2017. Completed and certified MSPO Auditor course in 2017 held by SGS (M) Sdn Bhd and ISO 9001:2015 lead auditor course by TOMC. Member of GGC MSPO audit team.

During this assessment, he assessed on the aspect of compliance to Management Commitment and Responsibility, Social Responsibility, Health, Safety and Employment Condition. He is able to speak and understand Bahasa Malaysia and English.

### Auditor

**Name:** **Mohd Razin bin Bakal**

Graduate in Degree of Accountancy with University Putra Malaysia. Having 17 years of working experience in various field in Malaysia, Africa and Indonesia. Have enough knowledge and experiences in oil palm estate operation inclusive of estate administrative, budget preparation, jungle clearing, new planting, nursery establishment and management, harvesting, field upkeep and maintenance, safety and health, vehicle running and skills in Good Agricultural Practices (GAP) including Integrated Pest Management (IPM). Involved in MSPO auditing since 2018. Qualified as Lead Auditor/Auditor for MSPO 2530:2013, ISO 14001:2015 and ISO 9001:2015 from Sirim Berhad. Member of GGC MSPO audit team.

During this assessment, he assessed on the aspect of Compliance to Legal Requirements, Environment, Natural Resources, Biodiversity and Ecosystem Services and Best Practices. Able to speak and understand Bahasa Malaysia and English.



## 1.8 Audit Methodology

The audit was conducted based on sampling following the method as specified in the MSPO requirements (MSPO-Questionnaire Self-Assessment – RA). The sampling was calculated and determined prior to the audit assessment. In the case of this certification unit, sampling calculation was not applied as there is only one palm oil mill, namely “Kok Foh POM”.

The assessment activities include of documents review and site inspection. The documents that had been reviewed among others were company policy, internal procedures, management system procedures, waste management procedures, legal documents etc. Significant issues that would impact to the environmental and social were also been verified.

The methodology for collection of objective evidence was established during physical site inspections, observation of tasks and processes, interviews of stakeholders, interview of officers, review of documents and data. Checklists and questionnaires were used to guide the collection of information and the comments made by external stakeholders were also been taken into consideration in this assessment.

Appendix A (Audit Plan) details the actual assessment plan. Stakeholders were consulted randomly during the assessment to obtain feedback on the management compliance and performance (Appendix C) of MSPO.

The Prime Minister, Tan Sri Muhyiddin Yassin did announce that the Recovery Movement Control Order (RMCO) ended 31<sup>st</sup> August 2020 has been extended for a period of 01<sup>st</sup> September 2020 until 31<sup>st</sup> December 2020.

With reference to the Federal Government Gazette (9<sup>th</sup> June 2020), Prevention and Control of Infectious Diseases (Measures Within Infected Local Areas) (No. 7) Regulations 2020, Certification for Agri Commodities was not included in prohibited activities.

Majlis Keselamatan Negara (MKN) had issued a Standard Operating Procedure for “Persijilan bagi Agrokomoditi” dated 12<sup>th</sup> June 2020 which need to be complied during the audit process by both parties, the Certification Body and clients.

## 1.9 Audit Plan Information

<b>Audit Date</b>	22 <sup>nd</sup> October 2020
<b>Name of site(s) visited</b>	Kok Foh POM
<b>Total number of man-days spent</b>	3 man-days

**1.10 Audit Result Summary Findings**

Findings category		
Category	Numbers	Status (Closed/Open/Not Applicable/No Action Requires)
Major Nonconformities	0	No action requires
Minor Nonconformities	0	No action requires
Area of Concern	0	No action requires
Noteworthy /Positive Comments	7	No action requires

**1.11 Stakeholder Consultation**

As per ACB-Malaysian Sustainable Palm Oil (MSPO); ACB-OPMC4; Issue 1, 01<sup>st</sup> August 2017; Stakeholder Consultation Requirements For Certification Bodies Operating Oil Palm Management Certification Under Malaysian Sustainable Palm Oil (MSPO) Certification Scheme. The consultation during the audit will be carried out during the stage 2 and recertification audit of the management unit. The CB shall carry out stakeholder consultation to ensure continued compliance with the requirements of the certification standards. However, stakeholders' consultation during surveillance audit may be limited to those stakeholders who have raised concerns, complaints or disputes prior to the audit.

During this Annual Surveillance Audit (ASA 3), the audit team has conducted stakeholder consultations involving both internal and external stakeholders as to understand the practices in relation to environmental, social performance and their performance with respect to the MSPO requirements. The meeting was conducted without the present of mill management.

At the start of meeting, the auditor explained the purpose of the audit followed by an evaluation of the relationship between the stakeholders before discussions continued. The auditor recorded comments made by stakeholders and verified with the mill management before incorporating into the assessment findings. There was no negative complaint or feedback received during the audit or during the field assessment when interviewing with the external and internal stakeholders. The details is as per table below:

No	Stakeholders Name	Subject raised / Identified Risk	Company response and proposed action to be taken. [What we did]	Assessment team findings [Outcome]
1.	Stakeholder A (Mill workers)	<ul style="list-style-type: none"> <li>They aware and have good understanding about MSPO.</li> <li>They have good understanding about complaint and grievance mechanism.</li> </ul>	No action requires	Positive findings

		<ul style="list-style-type: none"> <li>• Personal Protective Equipment are distributed free of charged by management.</li> <li>• Company well managing the welfare, health and safety of their workers.</li> <li>• They are very happy with the management and hopes to continue their contract for a long time.</li> <li>• They have been treated equally without any discrimination. Their salary was according to Minimum Wage Order 2020.</li> <li>• MSPO awareness, company policy and SOP are briefed among workers during muster call.</li> </ul>		
2.	Stakeholders B (Mill - Gender Committee Representatives)	<ul style="list-style-type: none"> <li>• They aware and have good understanding about MSPO.</li> <li>• They have been treated equally without any discrimination.</li> <li>• No sexual harassment reported.</li> </ul>	No action requires	Positive findings
3.	Stakeholders C (Contractors)	<ul style="list-style-type: none"> <li>• They have good understanding about MSPO.</li> <li>• The company has good relation with supplier and there is no issue with company's performance.</li> <li>• They informed that the payments were made promptly without any delay. Contract agreement were signed prior commencement of work.</li> </ul>	No action requires	Positive findings

### 1.12 Recommendation

The company has established Sustainability Policy, objectives and procedures that define an effective system for the administration and control of sustainability management system throughout all operation activities of Sime Darby Plantation Berhad especially for Kok Foh POM. Sr. Mill Manager is in charge and ensures that facility and his subordinates comply with the requirements and procedures stated in this manual. The site also assists by Sime Darby Plantation Sustainability and Quality Management (PSQM).

The management is committed to comply with MSPO system by giving awareness training to all personnel involved in this standard to make them understand the procedures and implementation of the standard. The employees are aware of the requirements of MSPO. There was no complaint or feedback received during this Annual Surveillance Audit (ASA 3).

This report will be internally reviewed for certification decision by GGC and external peer review by independent reviewers (Qualified by MPOCC) not required. During Annual Surveillance Audit (ASA 3) [based on MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO)] Part 4: General Principles For Palm Oil Mills, there was no non-conformity has been raised to the facility that being audited.

Since the audit objectives as mentioned in the audit plan have been achieved and assessment resulted was no major non-conformity findings. Therefore, the Lead Auditor recommends to continuing a certificate of compliance "MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles For Palm Oil Mills" to Sime Darby Plantation Berhad – Kok Foh Palm Oil Mill.

### 1.13 Date of Next Surveillance Audit

The first annual surveillance assessment visit will be scheduled after 12 months of the MSPO Certificate being issued.

### 1.14 Confidentiality

GGC auditors will not discuss or reveal any of the confidential information seen during the audit to any third party. Any public summary of the main assessment will be approved by the client prior to publication.

### 1.15 Abbreviations Used

BOD	Biological Oxygen Demand
CHRA	Chemical Health & Risk Assessment
CIP	Continuous Improvement Plan
COD	Chemical Oxygen Demand
CoP	Code of Practise
CSPO	Certified Sustainable Palm Oil
CPO	Crude Palm Oil
CSPK	Certified Sustainable Palm Kernel
DOE	Department of Environmental
DOSH	Department of Occupational Safety and Health Malaysia
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan

FFB	Fresh Fruit Bunch
FGS	Finished Good Stock
GAP	Good Agriculture Practise
GHG	Greenhouse Gas
GGC	Global Gateway Certifications Sdn Bhd
HIRARC	Hazard Identification, Risk Assessment and Risk Control
ISCC	International Sustainability & Carbon Certification
IPM	Integrated Pest Management
MPOB	Malaysian Palm Oil Board
MSPO	Malaysian Sustainable Palm Oil
NCR	Non-Conformance Report
NGO	Non-Government Organization
OHS	Occupational Health & Safety
OHSAS	Occupational Health and Safety Assessment Series
PK	Palm Kernel
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
SEIA	Social Environmental Impact Assessment
SOP	Standard Operating Procedure
SPO	Sludge Palm Oil

## SECTION II : ASSESSMENT FINDINGS BY PRINCIPLES AND CRITERIA

### 2.1 Principle 1 : Management commitment and responsibility

#### Criterion 1 Malaysian Sustainable Palm Oil (MSPO) Policy

**Indicator 1** Policy for the implementation of MSPO shall be established.

**Summary** Sime Darby commitments towards MSPO compliance being established through Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha, Group Managing Director dated 2<sup>nd</sup> December 2019.

As evidence, the policy was displayed and sighted on the notice board. Sighted training and briefing on the company's policies was conducted to the workers in year 2020.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 2** The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation.

**Summary** The sustainability goals are in line with United Nations Sustainable Development Goals (UNSDG) 2030, which committed to: -

1. Promoting good governance and transparency
2. Contributing to a better society
3. Minimizing environmental harm
4. Delivering sustainability quality

This policy being guided by the commitments spelt out in the Company's: -

1. Responsible Agriculture Charter (RAC)
2. Human Rights Charter (HRC)
3. Innovation and Productivity Charter (IPC).

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

#### Criterion 2 Internal audit

**Indicator 1** Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.

**Summary** Sime Darby Plantation, Plantation Sustainability and Quality Management (PSQM), Internal Audit Procedures, Doc No: SD/SDP/PSQM/IAP Revision 2 Date 1/11/2017. The internal audit being conducted annually to implement and maintain the respective standard requirements effectively within the Group.

The Management had drawn an Internal Audit Plan and it being carried out once a year to the Estate. The Internal audit conducted by SQM Malaysia & Central East RSQM. Sighted Internal Audit Plan and conducted as below: -

- Kok Foh POM - 3<sup>rd</sup> March 2020



**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 2** The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.

**Summary** The MSPO Internal Audit for Kok Foh Mill was conducted on 3<sup>rd</sup> March 2020 by GSQM & RSQM.

The team Lead Auditor is Miss Nadiah Mohamed Nazri and assisted by Co- Auditor, Rafizamza Jamaluddin and Observer, Cyprian Denis Daris.

The NC's raised as follows: -

	KOK FOH POM
Date report send by GSQM	10/3/2020
Major	4
Minor	10
OFI	5
Date Response to GSQM	23/3/2020

All the findings were closed within stipulated timeframe of 2 weeks.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 3** Reports shall be made available to the management for their review.

**Summary** The internal audit report was documented and made available for management review. As evidence, all findings from internal audit were responded by Mill Management within the acceptable timeframe.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

### **Criterion 3 Management review**

**Indicator 1** The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.

**Summary** Sime Darby Plantation, Estate Quality Management System, Level 2 Standard Operation Manual (SOM) Section 5, Management Responsibility sub-section 5.6, Management Review Sime Darby Plantation Quality Management System, Version 1:2008 Issue date: 01/11/2008. The frequency for management review needs to be carried out at least once a year.

The Management Review meeting is on Operating Unit basis. The actual meeting date as below: -

	Date of Meeting	No of Participants
Kok Foh POM	13/7/2020	17

The agendas discussed in the meeting are the following:

- Review of last meeting and confirmation of the minutes.
- Review of status / issue of Input and Output
- Sustainability Management
- Resource evaluation, needs and plan
- Results from system audit
- Changes that could affect the Management Systems
- Recommendation for Improvement
- Other matters

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

#### **Criterion 4 Continual improvement**

**Indicator 1** The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.

**Summary** Among the LSS [Lean Six Sigma] and Kaizen to continuously improve operational process sighted were to increase kernel productivity from 4.87% to 5.32% by repairing kernel silo inlet door and setting timer for kernel silo discharging to kernel bunker. Other CIP includes of reducing maintenance cost of ripple mill.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Indicator 2** The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.

**Summary** Mill management has established training program based on the training need analysis. However, should there be any new information or new technique available in the market and planning to be implemented in the mill compound, it will be notified by the mill management and will be slot in the training program. This however will depend on the current situation and priority.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

## 2.2 Principle 2 : Transparency

### Criterion 1 Transparency of information and documents relevant to MSPO requirements

**Indicator 1** The management shall communicate adequate information to other stakeholders on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.

**Summary** Sime Darby Plantation Berhad has established Standard Operation Manual (SOM); Sub Section 5.5 – Management Responsibility; Appendix 5.5.3.2 - Procedure for External Communication; Version: 1; Issue: 1; Issued Date; 01<sup>st</sup> November 2008. The procedure is to be activated when communicating and reporting on estate's quality, safety & health and environment (QSHE) issues with all internal and external interested parties.

Stakeholder Meeting was held on 04<sup>th</sup> August 2020 at Kok Foh Estate Meeting Room, attended by 19 participated. The meeting was chaired by Mr. Abdul Halim bin Shahor (Sr. Mill Manager). There are a few Request/Consultation/Communication from the stakeholders. Among the request:

Mr. MSAB – Estate Assistant Manager

- Request
  - "Berharap aka nada aktiviti yang boleh menyatukan antara ladang-ladang yang berdekatan dan ladang/kilang seperti pertandingan bola sepak, bola tampar, badminton dan sebagainya"
- Response
  - "Pengurusan menerima baik cadangan tersebut dan mencadangkan diadakan setelah kadar peratusan pandemik Covid – 19 menurun."

Mr. CNF – Cheong Wing Chan Estate

- Request
  - "Berharap jika ada traktor angkut buah melebihi muatan dari Ladang CWC melalui Ladang Kok Foh, pihak ladang atau kilang memaklumkan/mengambil Tindakan sewajarnya supaya tidak berlaku perkara yang tidak diingini."
- Response
  - "Pengurus akan mengambil maklum dan akan mengambil Langkah-langkah yang sewajarnya."

**In Compliance**    ☒ **Yes**                      ☐ No                      ☐ Not Applicable

**Indicator 2** Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes

**Summary** Management documents that publicly available is published in company's website <http://www.simedarby.com/> including all policies and statements by top management. Specific management document for respective management units is available upon request and approval from Sr. Mill Manager. This is to ensure the information would not being resulted any negative environmental or social outcomes.

All these documents were sighted in the estate office. Requests for official documents through the estate office will have to go through the Sr. Mill Manager.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

Criterion 2	Transparent method of communication and consultation
Indicator 1	Procedures shall be established for consultation and communication with the relevant stakeholders.

**Summary** Sime Darby Plantation Berhad has established Standard Operation Manual (SOM); Sub Section 5.5 – Management Responsibility; Appendix 5.5.3.2 - Procedure for External Communication; Version: 1; Issue: 1; Issued Date; 01<sup>st</sup> November 2008.

The procedure is to be activated when communicating and reporting on mill's quality, safety & health and environment (QSHE) issues with all internal and external interested parties.

Interview with the staff and estate workers confirmed they have been informed and updated during the stakeholder meeting and that they are aware of the above process.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 2	The management shall nominate management officials at the operating unit responsible for issues related to Indicator 1 (4.2.2.1).
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**Summary** The person in charge for consultation and communication agenda is led by Mr. Mohd Khairi bin Abdul Kudus (Mill Sr. Assistant Manager) and appointed on 04<sup>th</sup> July 2020 by Mr. Abdul Halim bin Shahor (Sr. Mill Manager).

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained.
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**Summary** Sighted latest stakeholder list for Kok Foh POM updated on 1<sup>st</sup> June 2020. Prepared by Mr. Mohd Khairi bin Abdul Kudus (Mill Sr. Assistant Manager) and approved by Mr. Abdul Halim bin Shahor (Sr. Mill Manager).

- a) Government / Statutory Bodies
  - Malaysian Palm Oil Board (MPOB)
  - Department of Safety and Health (DOSH)
  - Department of Labour (JTK)
  - Department of Environment (DOE)
  - Fire and Rescue Department of Malaysia
  - Social Security Organisation (SOCSSO)
  - Hospital Tuanku Ampuan Najihah
  - Hospital Jempol

- Balai Polis Jempol
  - Balai Polis Bahau
- b) Non-Governmental Organisation (NGO)
- All Malayan Estates Staff Union (AMESU)
  - National Union of Plantation Workers (NUPW)
- c) Service Providers / Contractors / Suppliers
- Kualiti Alam Sdn Bhd
  - Yuk Tak (M) Sdn Bhd
  - Boilermach Sdn Bhd
  - Bahau Print Enterprise
  - Daya Transport Sdn Bhd
  - Kejuruteraan Elektrik WH
  - Metrology Corporation Sdn Bhd
  - Segamat Engineering Hardwares
- d) Approved Certified Supplier List
- Kok Foh Estate
  - Sg. Senarut Estate
  - Muar River Estate
  - Pertang Estate
  - Bukit Pilah Estate
  - St. Helier Estate
  - Sg. Sebalang Estate
  - Cheong Wing Chan Estate
  - Bukit Palong Estate
  - Felcra Berhad
  - KPFB – Felcra Pondo
  - Permodalan Pelangi
  - Eksklusif Pesona
- e) Mill Community / Mill Representatives
- NUPW Chairman
  - Women's Committee Chairman
  - Temple Committee Chairman
  - Surau Committee Chairman

The requests made will be processed / approved by Mill Sr. Manager or Assistant Manager. Sighted the above request and others as stated in the log book effectively responded by mill management.

**In Compliance**    ☒ **Yes**                      ☐ No                      ☐ Not Applicable

Criterion 3	Traceability
<b>Indicator 1</b>	The management shall commit itself to implement and maintain the requirements for traceability and shall establish a standard operation procedure for traceability.
<b>Summary</b>	<p>Sime Darby Plantation Berhad has established Standard Operating Procedure (SOP); Appendix 15 – SOP For Sustainable Supply Chain and Traceability; Version: 2; Issue: 2; Issued Date; April 2019.</p> <p>Verified the implementation of this SOP as per Figure 1: Overview of Supply Chain of Upstream from product FFB to POM until downstream refiners/bulking installations. Sufficient information is stated on the weighbridge ticket or consignment note of all delivery of FFB including:</p> <ul style="list-style-type: none"> <li>• MSPO Certificate number</li> <li>• Estate name</li> <li>• Quantity</li> <li>• Vehicle number</li> <li>• Driver name</li> </ul> <p>The purpose of this procedure is to establish a suitable identification and traceability of oil palm Fresh Fruit Bunch (FFB) production traceable from the plantation activities till dispatch of Palm Oil Mill.</p> <p><b>In Compliance</b>    <input checked="" type="checkbox"/> <b>Yes</b>                      <input type="checkbox"/> No                      <input type="checkbox"/> Not Applicable</p>
<b>Indicator 2</b>	The management shall conduct regular inspections on compliance with the established traceability system.
<b>Summary</b>	<p>A regular inspection on compliance with the established traceability system is through the daily summary of incoming FFB records and will be verified in internal audit. Sighted last internal audit report is covering Traceability elements.</p> <p>During mill visit, sighted the weighbridge operator able to demonstrate on how the system tracks the FFB input from own estates and also from external suppliers.</p> <p><b>In Compliance</b>    <input checked="" type="checkbox"/> <b>Yes</b>                      <input type="checkbox"/> No                      <input type="checkbox"/> Not Applicable</p>
<b>Indicator 3</b>	The management shall identify and assign suitable employees to implement and maintain the traceability system.
<b>Summary</b>	<p>The person in charge for traceability agenda is led by Mr. Mohd Khairi bin Abdul Kudus (Mill Sr. Assistant Manager) and appointed on 04<sup>th</sup> July 2020 by Mr. Abdul Halim bin Shahor (Sr. Mill Manager).</p> <p><b>In Compliance</b>    <input checked="" type="checkbox"/> <b>Yes</b>                      <input type="checkbox"/> No                      <input type="checkbox"/> Not Applicable</p>
<b>Indicator 4</b>	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.



**Summary**

Purchases and sales will base on demand and has agreeable documentation with the supplier. Sighted CPO/PK sales as per in their online system. The mill has good system for tracking the movement of FFBs. The mill recorded all FFB received, FFB Processed, CPO & PK Produced and CPO & PK Stock Position in their system.

Seen the records of sales, delivery or transportation of FFB. This record being maintained and the documents are kept by the both site (estate and mill).

**FFB Received**

- Supplier: Kawasan Kepis – Ladang Kawasan Kepis
- Date Delivery: 12/05/2020
- Weighbridge Ticket No: 170931
- Transporter: Felcra B – Felcra Berhad
- Driver name: Zulkiefli bin Abu Kasim
- Weight: 4.01 MT

**CPO Sold**

- Buyer: Sime Darby Plantation Berhad - Nuri Edible Oil (NEO)
- Date Delivery: 28/07/2020
- Weighbridge Ticket No: 013887
- DO No: 004460
- Transporter: Nashreena
- Driver name: Muhammad Noor Amry bin Sulong
- Weight: 41.33 MT

**In Compliance**    ☒ **Yes**                      ☐ No                      ☐ Not Applicable

## 2.3 Principle 3 : Compliance to legal requirements

### Criterion 1 Regulatory requirements

**Indicator 1** All operations shall be in compliance with applicable local, national and ratified international laws and regulations.

**Summary**

List & summary of applicable laws and regulations that are applicable for the west Malaysia. The Legal Register has been revised (updated 2020) and approved by Senior Manager POM as follow;

POM	Revision Date	PIC	Manager
Kok Foh Palm Oil Mill	27/05/2020	Mr. Mohd Khairi bin Abdul Kudus	Mr. Abdul Halim bin Shahor

The list of applicable laws and regulations which consist of documents/ laws that covers the requirements related to MSPO compliance include:

1. Prevention and Control of Infectious Diseases Act 1988, Act 342

2. Occupational Safety and Health Act 1994 (Act 514)
3. Environmental Quality Act 1974 (Act 127)
4. Factories and Machinery Act with regulations 1967 (Act 139)
5. Pesticides Act 1974 (Act 149)
6. MPOB Act 1998 (Act 582)
7. Road Transport Act 1987 (Act 333)
8. Employees Social Security Act 1969 (Act 4)
9. Food Act and Regulations Act 1983 (Act 281)
10. Industrial Relations Act 1967 (Act 177)
11. Trade Union Act 1959 (Act 262)
12. Employees Provident Fund 1991 (Act 452)
13. Human Rights Commission of Malaysia Act 1999 (Act 597)
14. Control of Supplies (Act 122)
15. Employment Act 1955 (Act 265)
16. Electricity Supply Act 1990 (Act 447)
17. Sales Tax Act 1972 (Act 64)
18. Medical Assistant Registration Act (Act 180)
19. Immigration Act 1959/1963 (Act 155)
20. Workers' Minimum Standards of Housing and Amenities Act 1990 (Act 446)
21. Workman Compensation Act 1952 (Act 273)
22. Conservation of Environment Enactment 1996
23. Wetlands and Climate Diversity
24. Stockholm Convention on Persistent Organic Pollutants (2001)
25. Rotterdam Conventions on Prior and Informed Consent Procedure for certain Hazardous Chemicals and Pesticides in International Trade (1998)
26. International Labour Organization (ILO) Convention 98 (1949) Right to Organize and Collective Bargaining
27. Personal data Protection Act 2010 (Act 709)
28. Malaysian Anti-Corruption Commission 2009 (Act 694)
29. Whistle blower Protection Act 2010 (Act 711)
30. Environment Protection Enactment 2002
31. Environment Protection (Prescribed Activities) Order 2005
32. Environmental Impact Assessment Order 2005
33. Weights and Measures Act 1972 (Act 71)
34. Wetlands and Climate Change, 1999.
35. Employment Insurance System (EIS) 2017 (Act 800)
36. Minimum Retirement Age Act 2012 (Act 753)
37. Passport Act 1966
38. Children and Young Persons (Employment) Act 1966 + 2018 Amendment (Act 350)
39. Minimum Wages Order 2020
40. Perintah Pencegahan dan Pengawalan Penyakit Berjangkit (Pengisytiharan Kawasan Tempatan Jangkitan) (Pelanjutan Kuat Kuasa) (No.2) 2020
41. Perintah Pencegahan dan Pengawalan Penyakit Berjangkit (Pengisytiharan Kawasan Tempatan Berjangkit) (Pelanjutan Kuat Kuasa) (No. 5) 2020
42. Perintah Pencegahan dan Pengawalan Penyakit Berjangkit Peraturan – Peraturan Pencegahan dan Pengawalan Penyakit Berjangkit (Langkat – Langkah Di Dalam Kawasan Tempatan) (No.7) 2020

43. Perintah Pencegahan dan Pengawalan Penyakit Berjangkit Peraturan – Peraturan Pencegahan dan Pengawalan Penyakit Berjangkit (Pengkompaunan Kesalahan – Kesalahan) (Pindaan) (No.7) 2020

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Indicator 2** The management shall list all relevant laws related to their operations in a legal requirements register.

**Summary** Kok Foh Palm Oil Mill, the lists of permits / licenses which has to be monitored and updated periodically include;

1. Perakuan Kelayakan Pengandung Tekanan Tak Berapi perihal 20 Ton FFB Sterilizer, No Pendaftaran: NS PMT 3056, untuk tekanan Kelumpang 350.00 kilopascal, Ref No. PMT-NS/20 34498 expiry 06/12/2021
2. Perakuan Kelayakan Pengandung Tekanan Tak Berapi perihal 20 Ton FFB Sterilizer, No Pendaftaran: NS PMT 3056, untuk tekanan Kelumpang 350.00 kilopascal, Ref No. PMT-NS/20 34499 expiry 06/12/2021
3. Perakuan Kelayakan Pengandung Tekanan Tak Berapi perihal Thermal Deaerator, No Pendaftaran: NS PMT 3063, untuk tekanan Kelumpang 350.00 kilopascal, Ref No. PMT-NS/20 34500 expiry 06/12/2021
4. Perakuan Kelayakan Pengandung Tekanan Tak Berapi perihal Water Softner, No Pendaftaran: NS PMT 3066, untuk tekanan Kelumpang 350.00 kilopascal, Ref No. PMT-NS/20 34501 expiry 06/12/2021
5. Perakuan Kelayakan Pengandung Tekanan Tak Berapi perihal Air Received Tank, No Pendaftaran: NS PMT 3115, untuk tekanan Kelumpang 999.00 kilopascal, Ref No. PMT-NS/20 34502 expiry 06/12/2021
6. Perakuan Kelayakan Pengandung Tekanan Tak Berapi perihal Steam Separator, No Pendaftaran: NS PMT 3131, untuk tekanan Kelumpang 2069/-100 kilopascal, Ref No. PMT-NS/20 34503 expiry 06/12/2021
7. Perakuan Kelayakan Pengandung Tekanan Tak Berapi perihal Air Receiver, No Pendaftaran: NS PMT 74, untuk tekanan Kelumpang 1034.00 kilopascal, Ref No. PMT-NS/20 34504 expiry 06/12/2021
8. Perakuan Kelayakan Pengandung Tekanan Tak Berapi perihal Steam Separator, No Pendaftaran: NS PMT 4129, untuk tekanan Kelumpang 2069.00 kilopascal, Ref No. PMT-NS/20 34505 expiry 06/12/2021
9. Perakuan Kelayakan Pengandung Tekanan Tak Berapi perihal Air receiver tank, No Pendaftaran: NS PMT 80298, untuk tekanan Kelumpang 999.00 kilopascal, Ref No. PMT-NS/20 34506 expiry 06/12/2021
10. Perakuan Kelayakan Pengandung Tekanan Tak Berapi perihal Air receiver, No Pendaftaran: NS PMT 80320, untuk tekanan Kelumpang 999.00 kilopascal, Ref No. PMT-NS/20 34507 expiry 06/12/2021

11. Perakuan Kelayakan Pengandung Tekanan Tak Berapi perihal Bi-Drum Water Tube Boiler, No Pendaftaran: NS PMD 80060, untuk tekanan Kelumpang 2500.00 kilopascal, Ref No. PMD-NS/20 34508 expiry 06/12/2021
12. Perakuan Kelayakan Pengandung Tekanan Tak Berapi Perihal Air Compressor Receiver, No Pendaftaran: JH PMT 3068, untuk tekanan Kelumpang 1034.00 kilopascal, Ref No. PMT-JH/20 102772 expiry 03/05/2021
13. Perakuan Kelayakan Pengandung Tekanan Tak Berapi Perihal Air Compressor Receiver, No Pendaftaran: JH PMT 3068, untuk tekanan Kelumpang 1034.00 kilopascal, Ref No. PMT-JH/20 102772 expiry 03/05/2021
14. Perakuan Kelayakan Pengandung Tekanan Tak Berapi Water Softener, No Pendaftaran: JH PMT 3066, untuk tekanan Kelumpang 350.00 kilopascal, Ref No. PMT-JH/20 34501 expiry 03/05/2021
15. MPOB License No. 543656004000 for Kok Foh Palm Oil Mill, untuk menjual dan mengalih (PK, CPO, SPO), Membeli dan Mengalih (FFB), Menyimpan (PK,CPO,SPO) dan Mengilang (FFB) for a period of 01.11.2019 till 31.10.2021.
16. Lesen untuk menduduki atau menggunakan premis yang ditetapkan "Lot 82,83 & 88, Ladang Kok Foh, 72109, Bahau, Negeri Sembilan" for a period of 01.07.2020 – 30.06.2021
17. Jadual Pematuhan. No. Lesen 006013 for a period of 01.07.2020 – 30.06.2021
18. Permit Potongan Upah di bawah Seksyen 24 Akta Kerja 1955 Bagi Tujuan bayaran bil elektrik.
19. Noise Risk Assessment (HQ/LPROYKPEB/19/00032). Date of Assessment: 29 - 30.10.2019 (Area Monitoring) and 30.10.2019 (Personal Monitoring).
20. Environmental Noise Level Monitoring at Kok Foh Palm Oil Mill. Monitoring date: 24<sup>th</sup> – 25<sup>th</sup> September 2020.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 3** The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.

**Summary** Changes to legal requirements are monitored and updated by company's Group Sustainability & Quality Management (GSQM). The SOP 2.0 (Legal Compliance) has specified any changes to legal requirements are tracked by means of periodic review and evaluation on the Laws & regulations list to ensure that any new/addition as well as changes and amendment are captured and updated, through the following manner:

1. Head Office Assignee to identify and register all applicable laws & regulations pertaining to estate / palm oil mill operation.
2. Head Office Assignee to arrange the purchase of the applicable laws & regulations books where possible. Otherwise, downloaded/ soft copy would be used.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 4** The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.

**Summary** The person in-charge responsible to monitor and track and update the changes in regulatory requirements stated below;

POM	PIC	Approval by	Letter Date
Kok Foh Palm Oil Mill	Mr. Mohd Khairi Abdul Kudus	Mr. Abdul Halim Shahor	4 <sup>th</sup> July 2020

Changes to legal requirements are monitored and updated by company's Group Sustainability & Quality Management (GSQM) while Estate Assistant for each operating unit been appointed as person in-charge for all legal register and amendments as per appointment letter sighted during the audit.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

## **Criterion 2 Land use rights**

**Indicator 1** The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.

**Summary** The Palm Oil Mill is located within Kok Foh Estate land under Lot No. PT 3400, Grand title No. 17795.

No boundary markers sighted in the mill premises. However, the permanent fence separated mill and the Kok Foh Estate area.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 2** The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.

**Summary** The Palm Oil Mill is located within Kok Foh Estate land under Lot No. PT 3400, Grand title No. 17795. The land title Austral Enterprises Berhad, which is a subsidiary.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 3** Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground, where practicable.

**Summary** The Palm Oil Mill is located within Kok Foh Estate land under Lot No. PT 3400, Grand title No. 17795. The Palm Oil Mill has license form DOE for its operation. Sighted DOE license No.002079 dated 15<sup>th</sup> November 2010 issued for Kok Foh Palm Oil Mill sited on lot no. 82, 83 & 88.

No boundary markers sighted in the mill premises. However, the permanent fence separated mill and the Kok Foh Estate area.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 4** Where there are, or have been disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC).

**Summary** The Palm Oil Mill is located within Kok Foh Estate land under Lot No. PT 3400, Grand title No. 17795. There is no evidence of conflict present in this mill. There is no violence in instigated violence in maintaining peace because company has a clear procedure for land conflict.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

### **Criterion 3 Customary land rights**

**Indicator 1** Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.

**Summary** The Palm Oil Mill is located within Kok Foh Estate land under Lot No. PT 3400, Grand title No. 17795. There is no evidence of conflict present in this mill. There is no violence in instigated violence in maintaining peace because company has a clear procedure for land conflict.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 2** Maps of an appropriate scale showing extent of recognized customary rights shall be made available.

**Summary** The Palm Oil Mill is located within Kok Foh Estate land under Lot No. PT 3400, Grand title No. 17795. Thus, no disputes have been recorded in mill area. There is no evidence of conflict present in this mill. There is no violence in instigated violence in maintaining peace because company has a clear procedure for land conflict.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 3** Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available.

**Summary** There no land conflict or dispute. The mill land titles and ownerships are legally identified and documented. The Palm Oil Mill is located within Kok Foh Estate land under Lot No. PT 3400, Grand title No. 17795.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable



## 2.4 Principle 4 : Social responsibility, health, safety and employment condition

### Criterion 1 Social impact assessment (SIA)

**Indicator 1** Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.

**Summary** Sighted main template of Social Impact Assessment for SOU 16 being established on 1<sup>st</sup> February 2020 – 13<sup>th</sup> February 2016. SIA being reviewed every 5 years.

The SIA analyst of the impact on the following practices:

- 1) Safety and Health,
- 2) Payment procedures to contractors and suppliers,
- 3) Working environment,
- 4) Religious activities,
- 5) Housing complex
- 6) Complaint and Grievances.

No issues raised by stakeholders. The action plan being established based on the identified SIA analysis conducted.

The latest review of Social Impact for Kok Foh Mill was on the following issues:-

- 1) To maintain good housing conditions and amenities for employee.
- 2) To maintain good relationship between Management and workers.
- 3) To maintain good relationship between Management and External stakeholders.

Seen all the action taken to mitigate the issues highlighted. Person in- charge and records of monitoring also well recorded in the Review Report. The report being approved by Mr. Abdul Halim Bin Shahor, The Sr. Mill Manager.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

### Criterion 2 Complaints and grievances

**Indicator 1** A system for dealing with complaints and grievances shall be established and documented.

**Summary** Sime Darby has established Plantation Quality Management System, Level 2, Standard Operation Manual Sub –Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1 Year 2008, Issue No 1 dated 1<sup>st</sup> Nov 2008.

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

The mechanism is to enable effective and timely communication with employees and external interested parties.

Under Group policies and authority's GPA No 85 Whistleblowing channels are established to help all stakeholders raise concerns, without fear or retaliation, on any wrongdoing that they may observe in the Sime Darby Group. The statement can be viewed through <http://www.simedarbyplantation.com/>

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 2** The system shall be able to resolve disputes in an effective, timely and appropriate manner, which is accepted by all parties.

**Summary** The Standard Operation Manual under clause 6.3 Timeframe for External Communication has stated: -

1. Within 2 weeks of the date of receipt for communication requiring direct feedback.
2. Within 1 week of the completion of the investigation for communication requiring investigation.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 3** A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.

**Summary** The Mill has established Complaint Form and mostly related to repair of housing. Seen, 24 complaints being recorded in year 2020 to date.

Sample on internal complaint by Mr. Kamaruddin Md Hussain No S8 dated 8<sup>th</sup> October 2020 on damaged of mosquito netting. Seen, the complaint and action being responded within 7 working days on 15<sup>th</sup> October 2020.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 4** Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.

**Summary** Sighted, the latest stakeholder meeting conducted on 4<sup>th</sup> August 2020 attended by 19 participants respectively. The meeting chaired by Sr. Mill Manager, Mr. Abdul Halim Bin Shahor.

Latest Sustainability training, Townhall 8.0 was conducted on 23<sup>rd</sup> September 2020 to 53 employees by Sr. Mill Manager, Mr. Abdul Halim Bin Shahor.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 5** Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.

**Summary** Sighted all internal and external complaints filled, responded and the records being maintained for the last 24 months.

No negative complaints made by internal/external stakeholders within last 24 months.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Criterion 3 Commitment to contribute to local sustainable development**

**Indicator 1** Palm oil millers should contribute to local development in consultation with the local communities. Where the mill is an integral part of a plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.

**Summary** Mill is committed and have contributed to local development. The contribution made to the internal and external stakeholders. As evidence, the management has organized activities as follows: -

- Biodiversity Programme between SOU 16 and Fisheries Department of Negeri Sembilan dated 18<sup>th</sup> June 2020.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Criterion 4 Employees safety and health**

**Indicator 1** An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act139) shall be documented, effectively communicated and implemented.

**Summary** The group has established Group Sustainability & Quality Policy Statement signed by Mohamad Helmy Othman Basha, Pengarah Urusan Kumpulan on 02.12.2019.

For upstream operation, safety policy as per document "Upstream Malaysia – Health, Safety & Environment (HSE) Policy Statement" signed by Roslin Azmy Hassan, CEO Upstream Malaysia on 01.06.2020.

Sighted, Sime Darby Plantation Berhad has developed Occupational Safety and Health Manual dated 20<sup>th</sup> August 2008 by Plantation Sustainability and Quality Management Department.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Indicator 2 The occupational safety and health plan shall cover the following:**

- A safety and health policy, which is communicated and implemented.
- The risks of all operations shall be assessed and documented.
- An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:
  - all employees involved are adequately trained on safe working practices; and
  - all precautions attached to products should be properly observed and applied.
- The management shall provide the appropriate personal protective equipment (PPE) at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).
- The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to

Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.

f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.

g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meetings shall be kept and the concerns of the employees and any remedial actions taken shall be recorded.

h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.

i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.

j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.

## Summary

The group has established Group Sustainability & Quality Policy Statement signed by Mohamad Helmy Othman Basha, Pengarah Urusan Kumpulan on 02.12.2019.

For upstream operation, safety policy as per document "Upstream Malaysia – Health, Safety & Environment (HSE) Policy Statement" signed by Roslin Azmy Hassan, CEO Upstream Malaysia on 01.06.2020.

Sighted, Sime Darby Plantation Berhad has developed Occupational Safety and Health Manual dated 20<sup>th</sup> August 2008 by Plantation Sustainability and Quality Management Department

Risk assessment was conducted through HIRARC based on the severity and the likelihood.

HIRARC is consist of hazard identification (type of work activity, hazard & effect), Risk analysis (Existing risk control, likelihood, severity & risk) & Risk Control (Recommended control measures & PIC appointed are Staff or Executive).

HIRARC sighted for the followings work operation :-

- Weighbridge
- Ramp
- Sterilization
- Threshing Station
- Pressing Station
- Clarification
- Nut Cracking Station
- Kernel Plant
- Kernel Storage
- CPO Storage
- Boiler Station
- Engine Room

- Workshop - Mechanical
- Workshop - Electrical
- General – Cleaning and Others
- Store
- Laboratory
- Effluent Plant
- Water Treatment
- Office
- Security

Evidence, HIRARC being reviewed whenever accident occurred in workplace. The latest reviewed was on pressing station dated 21<sup>st</sup> July 2020.

The Mill has a comprehensive annual training plan for the Staffs and Workers and this was sighted in the training records file for each staffs and workers.

Training Plan includes:

No	Topic	Month programme	Month Conducted
1	Chemical Management	3/2020	15/3/2020
2	HIRARC	9/2020	21/7/2020
3	Safe Machine Operator Technique	4/2020	17/7/2020
4	Accident Investigation Techniques	2/2020	17/7/2020
5	Safe Operating Procedures	1/2020	5/1/2020
6	PPE Training & Demonstration	1/2020	5/1/2020
7	Safe Electrical Handling	3/2020	21/3/2020
8	LOTO System	3/2020	5/1/2020
9	1 <sup>st</sup> Aid Training	7/2020	9/07/2020

Samples training conducted:-

- Training for Chemical Spillage was sighted on 15<sup>th</sup> March 2020. 8 participants attended the training conducted by the Assistant Manager.

Mill has provided appropriate PPE for all workers in their operations.

Sighted, PPE Issuance and replacement record for:-

- Staff/AP

- Harvesters
- General Workers

During field visit, sighted the workers have been trained with safety and the workers wear the PPE required by his/her works.

All workers involved in the operations have been adequately trained in safe working practice.

Sighted, CHRA report dated 12<sup>th</sup> May 2015 and additional CHRA report dated 1<sup>st</sup> June to 8<sup>th</sup> October 2017 reported by Teh Teo Beng (JKKP HIE 127/171-2(166).

The new CHRA was conducted on 28<sup>th</sup> July 2020 by En. Nor Khairunnisa Liyana binti Ahmad, HQ/15/ASS/00/363-2020-055. However, yet to obtain the result.

Seen, Standard Operating Procedure for Chemical Safety Management under Sime Darby Plantation Sustainability and Quality Management (PSQM), Operational Control Procedure, Doc No: SD/SDP/PSQM(ESH)202-OH4 Revision 0, Dated 26<sup>th</sup> February 2015.

A total of 34 workers have undergone medical surveillance. They were tested on Physical examination, Blood, Urine, Cholinesterase and Chest X-ray.

The workers are from the categories of laboratory. Water plant, Effluent Treatment Plant, Store, workshop, Boiler, Supervisor.

Medical Surveillance to the above workers has been conducted on 18<sup>th</sup> July 2020. All the workers are fit for work.

Audiometric testing for year 2020 has been conducted to 80 mill workers dated 12<sup>th</sup> October 2020 by Etosh Consult & Engineering Plt. The report yet to be obtain and finalized by the appointed consultant.

OSH Committee Chart 2020 sighted. Seen, letter of appointment for committee members in the file. Mill Manager is the Chairman of OSH Committee. Person in-charge of OSH is Mr. Abdul Halim bin Shahor, the Sr. Mill Manager.

The committee meeting has been conducted as follows:-

- 6<sup>th</sup> August 2020
- 8<sup>th</sup> May 2020
- 3<sup>rd</sup> January 2020

To discuss all issues regarding worker's safety and health.

All issues raised and discussed during conducted meeting has been resolve and taken action by Mill management with proper action and target date. Zero accident in 2019 and 1 major accident recorded in 2020.



Sighted the Emergency Procedure for the Mill under Mill Quality Management System, Level 2, Standard Operation Manual Sub –Section 5.5 Management Responsibility Appendix 5.5.3.23 Emergency Preparedness and Response Procedure, version 1 Year 2008, Issue No 1 dated 1<sup>st</sup> Nov 2008.

Emergency response plan include the emergency contact number, and also have Guidelines on Accident, Emergency Procedures and Exit routes as well as assembly point in file and pasted on notice board.

The first aider for the Mill is En. Muhammad Khairul Anuar bin Abdul Hamid, Medical Assistant Kok Foh Complex.

Mill did establish List of First Aid Kit (Distribution List of First-Aid Kits). Each 1st Aid Kit is handled by a respective appointed person. No expired item nor oral medication was found in the first aid box.

Records of all accidents are available and discussed quarterly during OSH Meeting. Accident is handled according to the national OSH Department (JKKP) includes reporting any accident case, investigation and calculation of LTA.

Mill has submitted JKKP 8 (I & II)/(IV) on annually basis to the DOSH. LTA calculation based on local interpretation from DOSH. JKKP 8 was submitted on 24<sup>th</sup> January 2020.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

## **Criterion 5 Employment conditions**

**Indicator 1** The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.

**Summary** Sime Darby has established Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha; Group Managing Director dated 2<sup>nd</sup> December 2019.

Human rights element being spelt out under the followings: -

- i. Human Rights Charter – Clause 3.2, We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:
  - Providing equal opportunities
  - Respecting freedom of association
  - Eradicating any form of exploitation
  - Ensuring favorable working conditions
  - Enhancing safety and health
  - Respecting community rights and the rights of indigenous people
  - Protecting the Rights of vulnerable people
  - Protecting the rights of children
  - Eliminating violence and sexual harassment

- ii. Responsible Agriculture Charter – Human Rights and Social Development Commitments Clause 2.1, Respect Human Rights & empower communities and Clause 2.2 Protect Labor standards and enhance employment conditions.
- iii. Sime Darby Plantation Group, Vendor COBC dated 30<sup>th</sup> May 2018 under Clause 5, Labor and Human Rights.

Communication of all the policies to workforce is through town hall, training and during muster call. Seen, the communication to External Stakeholders through the Stakeholder Meeting.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Indicator 2** The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.

**Summary** Sime Darby has established Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha; Group Managing Director dated 2<sup>nd</sup> December 2019.

Human rights element on discriminatory practices and equal opportunity being spelt out under the followings: -

- 1) Human Rights Charter
- 2) Responsible Agriculture Charter
- 3) Responsible Agriculture Charter

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

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

This policy is available in English and Malay displayed at the mill and estate office wall and notice boards.

No evidence of discrimination based on race, skin color, religion, gender, national origin, ancestry, disability, marital status, and sexual orientation was found in the Mill.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Indicator 3** Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.

## Summary

Pay and conditions are documented in the workers' Contract Agreement and wage payment records / pay slip.

The salary is according to 'Guidelines on the Implementation on the Minimum Wages'. National Wages Consultative Council Act 2020 (Act 732) Malaysian minimum salary is RM1,200.00 as stated in the guidelines.

Rate of pay is based on MAPA / NUPW Agreement Salary Scale as seen in the Contract Agreement and pay-slip. All the workers are under Mill pay-roll system. Sample taken on the workers below: -.

Sampled of workers taken:

- Mr. JM
  - Payslip August 2020
  - Basic = RM 923.00
  - Shift Allowance – RM6.00
  - Holiday Pay – RM46.15
  - Sick Pay – RM138.45
  
  - Earning Outside Normal Hours
  - Overtime = RM 484.58
  
  - Defray Expenses
  - Phone reimbursement – RM5.00
  - Insurance – RM13.00
  - Hospital Charges – RM75.52
  
  - Total gross Salary – RM1,691.70
  
  - Deduction
    - Advance = RM 300.00
    - NUPW – RM11.00
    - NUPW Insurance – RM20.00
    - EPF – RM124.00
    - SOCSO – RM7.75
    - SIP – RM 3.10
  
  - Net salary = RM 1,215.85

All the salary being paid through bank.

**In Compliance**    ☒ **Yes**                      ☐ No                      ☐ Not Applicable

**Indicator 4** Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.

**Summary** Sighted the Contract Agreement between Kok Foh Mill and Ponvel Enterprise on JCB Rental at Compost Plant, the contract signed in November 2018 and being renewed yearly.

Sighted Tax Invoice No PE-0820-008, Purchase Order No; 4300513786 Delivery Order No : 003/08-20 from Ponvel Enterprise dated 31<sup>st</sup> August 2020. The invoice amounting RM12,285.00.

Evidence, payment being made to the vendor on 8<sup>th</sup> September 2020.

Seen, Agreement between the Contractor and his workers, Mr. Premkumar a/l Rajakrishnan. Salary being paid in timely manner. The salary voucher for July, August, September were well documented in the Estate office

Sighted, contribution of EPF and SOCSO being paid on monthly basis.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 5** The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.

**Summary** Sime Darby has established Check-roll Employee Listing system for all data of their workers. Sighted at Kok Foh Mill Personal Particulars data for all the workers in The Check-roll Employee Listing. The report stated the Offered Position, Personal Details, Date Employed, Educational background and Family Data.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 6** All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.

**Summary** Employment contract stated the offered position, wages implied, working hours, OT, allowances, rest day, working on holiday etc. The contract is in their origin country languages or English. as it is easy to be understood by workers.

This contract is signed by both employee and employer and accompanied with respective witnesses. Workers employed consisted of Malaysian and Indonesian. Sample taken on the following workers for Kok Foh Mill.-

- Husnu – Indonesian
- Jaganaswaran a/l Maniam – Malaysian
- Shahrul Effendi bin Mustaffa – Malaysian
- Mohd Fazli bin Ibrahim – Malaysian

- Norfazidah bt Nong – Malaysian
- Muhammad Adli bin Kamaruddin – Malaysian
- Norazian bt Dahram – Malaysian

All workers enjoy the same scale of pay and provided with equal housing and work facilities. This was confirmed through interview with workers from the mill and also through verification of contracts of service and pay slips of workers.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 7** The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.

**Summary** Working hours is 8 hours. From Monday to Saturday. The overtime maximum is 104 hours according to Malaysian Law.

Seen the working hours being displayed at the notice board. The office will be working from 8.00 am to 5.00pm and break time at 1.00 pm to 3.00 pm. The workers are based on shift 8.00am – 4.00 pm and 4.00 – 12.00 am

Mill has used punch - card as a working time recording system.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 8** The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirement applicable.

**Summary** The working hour and break time has been clearly stated in the Employment Contract.

Sighted in the Contract Agreement the rate of overtime which agreed by both parties.

There is no complaint received regarding payment or are forced to work overtime during site interview.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 9** Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.

**Summary** Salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker. Workers interviewed confirmed that they are being paid more than the stipulated minimum wage and that they understand all the deductions being made.

Documented payslip was distributed to individual workers on the day of payment.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 10** Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment,

support of professional development, medical care provisions and improvement of social surroundings

**Summary** All workers have been provided with medical and accident insurance.

With regards to local and foreign workers, staffs and executives, all of them are covered under EPF & SOCSO as required by the Malaysian Laws and Regulations.

All workers are provided with housing facilities at workers linesite. Medical Assistant is responsible to carry out the monitoring at workers quarters.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 11** In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.

**Summary** All workers are provided with housing facilities at workers linesite. Water is provided free and electricity is subsidized at 450 kW. Sanitary and waste disposal is managed by Mill and dispose to Gazetted Government Dispose area.

Mill Assistant Manager and Hospital Assistant are responsible to carry out the monitoring at workers quarters.

Welfare Amenities: Surau, Temple, Football Field, Clinic, Community Hall and Children Playground.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 12** The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.

**Summary** Sighted in Sime Darby Plantation Human Rights Charter under 3.2 Respect and Uphold Labour Rights clause: -

- 3.2.5 We will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights.

- 3.2.6 Creating a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict.

The mill has formed Gender Committee. Sighted the Gender Committee Handbook (First Edition) in English details out specifically on establishing & managing gender committee and complaints and grievance procedures to address gender-based issues.

There is also a specific procedure (in the form of a flowchart) in both English and Malay namely Sexual Harassment Procedure which outlines the basic framework for handling of sexual harassment complaints.

There is no sexual harassment case reported through interview and document reviewed in Estate.

Sighted the Gender Committee of Kok Foh Mill:-

- Chairwoman – Puan Norfazidah bt Nong
- Secretary – Shasikala
- Members – 5 representatives

Seen last meeting was conducted on 3<sup>rd</sup> July 2020 and discussing on women's right, activities and any other matters.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Indicator 13** The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.

**Summary** Sighted in Sime Darby Plantation Human Rights Charter under 3.2 Respect and Uphold Labour Rights clause: -

3.2.4 Respecting Freedom of Association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, we will provide alternative means of employee engagement and grievance redressal.

Workers interview found they are aware on their rights to voice out any issues and they are allowed to join the Union.

The policy being briefed to all workers during Town Hall Session and Stakeholder Meeting at Mill.

The documented social policy as specified above outlined the company's commitment to allow the workers to join and formed union among the workers.

The audit team observed that in general all employees are a member to NUPW which is the organization that representing the workers.

The NUPW is also a mechanism for the workers to voice their concerns pertaining to the working conditions and welfare.



**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 14** Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.

**Summary** Based on the employee's record compiled in Check-roll Employee Listing, sighted that there is no child labour employed by the Mill.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

#### **Criterion 6 Training and competency**

**Indicator 1** All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.

**Summary** Sime Darby has established Mill Quality Management System, Level 1, Quality Management Manual Section 6.0 Resource Management, Version 1 Year 2008, Issue No 1 dated 1<sup>st</sup> Nov 2008.

Under 6.2.2 stated the Competency, Awareness and Training procedures. The process of training includes :

- Identify training needs and provide appropriate trainings
- Evaluating the effectiveness of training at defined intervals
- Maintaining appropriate records of employees' training, skills and experience
- Determining competency requirements of each function.

Sighted, training programme for 2020 as follows: -

No	Topic	Month programme	Month Conducted
	Occupational Safety And Health		
1	Chemical Management	3/2020	15/3/2020
2	HIRARC	9/2020	21/7/2020
3	Safe Machine Operator Technique	4/2020	17/7/2020
4	Accident Investigation Techniques	2/2020	17/7/2020
5	Safe Operating Procedures	1/2020	5/1/2020
6	PPE Training & Demonstration	1/2020	5/1/2020
7	Safe Electrical Handling	3/2020	21/3/2020
8	LOTO System	3/2020	5/1/2020
9	1 <sup>st</sup> Aid Training	7/2020	9/07/2020
	Environmental		
1	Scheduled Waste Training	4/2020	15/3/2020

Evidence training conducted on Scheduled Waste dated 15th March 2020 conducted by OSH Department. The training attended by 26 participants.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Indicator 2** Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.

**Summary** All workers involved in the operations have been adequately trained in safe working practice. As evidence, sighted the training needs analysis prepared by the Mr. Mohd Khairi bin Abdul Kudus (Mill Sr. Assistant Manager) for each individual worker and approved by Mr. Abdul Halim bin Shahor (Sr. Mill Manager).

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Indicator 3** A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.

**Summary** All workers involved in the operations have been adequately trained in safe working practice.

The Mill has a comprehensive Training Needs Analysis for staffs and workers and this was sighted in the training records file.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

## 2.5 Principle 5 : Environment, natural resources, biodiversity, and ecosystem services

### Criterion 1 Environmental management plan

**Indicator 1** An environmental policy and management plan which shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.

**Summary** The company has established "Environmental Management Policy" which last updated on January 2015 and signed by company Managing Director Datuk Franki Anthony Dass. The policy has statement on its commitment to complying with statutory, legal and regulatory requirements. Sime Darby Plantation policies are publicly assessable from its website <http://www.simedarbyplantation.com/sustainability/beliefs-progress/governance/sustainability-policies>.

The policy is express the commitment in sustaining the environment and biodiversity as follows;

- i. Complying with statutory, legal and other regulatory requirements.
- ii. Establishing, maintaining and continually improving sustainable plantation management.

- iii. Elimination or minimizing any potential adverse effect on the environment arising from our plantation activities.
- iv. Applying Best Agriculture Practices and adhering to the standard land management and the new planting policy
- v. Value the importance of river and ecosystem functions
- vi. Promote, educate and encourage stakeholders in maintaining and enhancing the quality of the environment

To complement the above statements, our Operation Policies on Environment & Biodiversity, Slope & River Protection, Saving the Orang Utan and Carbon emission have been established to guide our operations.

**In Compliance**    ☒ **Yes**                      ☐ No                      ☐ Not Applicable

**Indicator 2** The environmental management plan shall cover the following:  
a) An environmental policy and objectives;  
b) The aspects and impacts analysis of all operations.

**Summary**                      The objective of Environment Management Plan is Planning, Organizing and Implementation the systematic ESH activities as a safeguard of the Palm Oil Mill's environment and our employees with an adequate training to be provided to all level of employees.

To systematically identify significant environments aspects and theirs impacts within the control and the physical boundary of the Palm Oil Mill as well as from future activities which may result from plant modification, expansion, increase in capacity etc., with the objective of improving on operational control and / or as basis for setting environmental objective and targets. Environment management programs are then formulated to achieve those objectives.

The company has established Environmental Impact Evaluation (EIE) and Environmental Aspect Impact (EAI) to evaluate the "Environmental aspect and Impact Form". the environmental impact evaluation consists of rating selected criteria.

Sighted the Environment Aspect Impact Koh Foh Palm Oil Mill for year 2020, Prepared by Mr. Mohd Khairi Abdul Kudus (Senior Assistant Manager POM) and Acknowledge by Mr. Abdul Halim Shahor (Senior Manager POM).

The Environment Assessment is consist of Environment Aspect, Environment Load Items and Environment Impact. The assessment of Palm Oil Mill's environmental aspect and impact are recorded in "Environmental aspect and Impact Form". For each of the activity identified the Palm Oil Mill Management has stated its Environmental load item (environmental aspect), environmental impact numbering and classification and legislation impact.

Environmental Impact :  
1 – Ozone Layer Depletion  
2 – Global Warming  
3 – Air Pollution

- 4 – Water Pollution
- 5 – Land Contamination
- 6 – Unpleasant working Environment
- 7 – Depletion of Natural Resources
- 8 – Community Impact
- 9 – Business Impact

Classification

C – Create impact

R – Reduce Impact

- Not Applicable

Sighted The aspects and impacts analysis for all operations has been documented in the EIE (Environmental Impact Evaluation) and EAI (Environmental Aspect Impact)

The assessment of Palm Oil Mill's environmental aspect and impact are recorded in "Environmental aspect and Impact Form". For each of the activity identified the Palm Oil Mill Management has stated its Environmental load item (environmental aspect), environmental impact numbering and classification and legislation impact.

- POM : Kok Foh Palm Oil Mill
  - Activity : Sterilizer
  - Environmental Aspect : Electric power consumption / Spillage
  - Environmental Load Items : Electric / Condensate Water / Loose Fruit
  - Environmental Impact :
    - Ozone Layer Depletion -
    - Global Warming -
    - Air Pollution - Create Impact -
    - Water Pollution - Create Impact -
    - Land Contamination - Create Impact -
    - Unpleasant working Environment -
    - Depletion of Natural Resources -
    - Community Impact -
    - Business Impact - Create Impact (C)

**In Compliance**    ☒ **Yes**                      ☐ No                      ☐ Not Applicable

**Indicator 3** An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.

**Summary** The company has established Environmental Impact Evaluation (EIE) and Environmental Aspect Impact (EAI) to evaluate the "Environmental aspect and Impact Form". the environmental impact evaluation consists of rating selected criteria.

Sighted the Environment Aspect Impact Kok Foh Palm Oil Mill for year 2020, Prepared by Mr. Mohd Khairi Abdul Kudus (Senior Assistant Manager POM) and Acknowledge by Mr. Mohd Halim Shahor (Senior Manager POM).

Sighted the Environment Improvement plan and mitigation the negative impact, Action



taken by and Time Frame as follows;

- POM : Kok Foh Palm Oil Mill
  - Environment Issue : Leakage chemical from Schedule Waste Store
  - Mitigating Measure / Action Plan :
    - i. To used spill kit "habuk kayu" to cleaning
    - ii. Spill kit after used declare as schedule waste
    - iii. To be disposed to approved contractor
  - Action by : Assistant Manager / Staff
  - Time Frame : As when necessary

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 4** A programme to promote the positive impacts should be included in the continual improvement plan.

**Summary** The program of Continuous Improvement Plan (Environmental) prepared and approved by the following personnel;

No	Environmental Issue	Improvement Plan
1	Leachate at EFB Bay	Improve the piping system line to ETP

The CIP (Environment) for Kok Foh Palm Oil Mill has been prepared by Prepared by Mr. Mohd Khairi Abdul Kudus (Senior Assistant Manager POM) and Acknowledge by Mr. Mohd Halim Shahor (Senior Manager POM) dated 4<sup>th</sup> February 2020.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 5** An awareness and training programme shall be established and implemented to ensure that all employees understand the policy, objectives and management plans and are working towards achieving the objectives.

**Summary** Sighted training program for year 2020 that included with environment training as below: -

POM : Kok Foh Palm Oil Mill  
 Environment Training Program as follows;  
 1. Environmental Quality Act and Regulations 1974  
 2. Scheduled Waste Management  
 3. RSPO / MSPO / SCCS Training

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 6** Management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.

**Summary** The management of Sime Darby Plantation Berhad has conducted the Centralize Environmental Regulatory Compliance Monitoring Committee – SOU 16 – Central West Region #1.

Sighted latest meeting minutes 01/2020 dated 14<sup>th</sup> February 2020 at Meeting Room, Pertang Estate which involve all Executive in SOU 16 with total of 24 person. The agenda of meeting as follows;

- Welcome speech and introduction to EPMC and ERCMC function to all committee members
- Confirmation of minutes
- Presentation of Data Analysis of schedule waste from May 2020 until August 2020
- Discussion on Palm Oil Mill managing the SW (our practices)
- Discussion on previous meeting
- Discussion new issue regarding SW.

In summary, Environmental requirement compliance monitoring committee (ERCMC) for SOU16 is well maintained and updated accordingly. The committee will continue to monitor on the performance and highlighted if any matters arise.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

## **Criterion 2 Efficiency of energy use and use of renewable energy**

**Indicator 1** Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.

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

Monthly record of energy consumption for non-renewable and sources were kept and documented. It is monitored to optimize use of renewable energy in Palm Oil Mill.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Indicator 2** Palm oil millers shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations.

**Summary** Kok Foh POM has estimation of total energy required. This estimation was compared to the actual usage by monthly. The mill conducts monitoring of fossil fuel in term of litre / MT FFB processed.

Monthly record of energy consumption for non-renewable and sources were kept and documented. It is monitored to optimize use of renewable energy.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Indicator 3** The use of renewable energy should be applied where possible.

**Summary** Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement.

Apart from use of diesel for electricity, palm fibre and nut shells were also used to generate electricity through steam turbine and boiler. The mill uses by product of FFB production as renewable energy source where 100% of fibre and shell are extracted from FFB production.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Criterion 3 Waste management and disposal**

**Indicator 1** All waste products and sources of pollution shall be identified and documented.

**Summary** Sighted the waste management plan year 2020 incorporated in the Environment Management Plan prepared by the Palm Oil Mill as follows;

Sighted the waste management plan year 2020 incorporated in the Environment Management Plan prepared by Mr. Mohd Khairi Abdul Kudus (Senior Assistant Manager POM) and verified by Mr. Halim (Senior Manager POM)

Sources of pollution and waste have been adequately identified by Palm Oil Mill. Generally, the wastes identified were of Domestic waste, Industrial waste, Schedule waste and Recycle Waste. Sighted Inventory of Scheduled Wastes, Fifth Schedule (Regulation 11) for Palm Oil Mill as the following;

1. SW 110 – Electrical Waste
2. SW 305 – Lubricating Oil Waste
3. SW 306 – Hydraulic Oil Waste
4. SW 322 - Isopropyl Alcohol
5. SW 324 – Hexane
6. SW 410 – Oil Filter

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

Objective	Category	Type / Location	Actions	Frequency
Proper disposal of waste in accordance to SOP and	Domestic waste	Rubbish (Workers housing complex, Office, Workshop,	To segregate recyclable material and to dispose through	As and when needed

legal requirement		Store and Shop)	recycling contractor / collectors	
			Create further awareness on recycling among workers through training and recycling campaigns	As and when needed
			Monitoring of Palm Oil Mill quarters	Weekly
		Sewage (Septic tank at workers housing complex & office)	To monitor during housing inspection / from residents' complaints	Weekly / As and when necessary
			To engagement with licensed contractor for Sewage management	As and when necessary
	Industry Waste	Scrap Metal	Labelling permanent signage  Proper storage of scrap yards before tendering out	As and when necessary
	Schedule Waste	Used lubricant container / pesticide /	To maintain inventory for storage of SW	Monthly
		chemical container (SW409)	To record of disposal to appointed contractors	As and when necessary



		Spent oil (SW305)	To record inventory in e-swiss	Monthly
		Contaminated rags & PPE (SW410)	To dispose through licensed vendor and to check validity of license	As and when necessary
		Clinical waste (SW404)	To disposed the item to licensed contractor (including VMO with approval letter)	As and when needed

**In Compliance**    ☒ **Yes**                      ☐ No                      ☐ Not Applicable

**Indicator 2** A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measures for:  
a) Identifying and monitoring sources of waste and pollution.  
b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.

**Summary** The Palm Oil Mill management has established waste management program identifying wastes generated from the Palm Oil Mill. It has classified into Scheduled Waste, Recycle Waste, Domestic Waste and Clinical Waste. Sample of are the waste management plan sighted include:

- 1) Type of waste: Schedule waste:  
Waste description: Used Lubricant (SW 305)  
Location: Workshop  
Action Plan: All used lubricant oil will disposed / bring back by SDI
- 2) Type of waste: Recyclable  
Waste description: EFB / POME  
Location: Palm Oil Mill  
Action Plan:
  1. To monitor collection of EFB
  2. To monitor BOD level of POME before land application

Sighted the Fifth Schedule (Regulation 11) Inventory of Scheduled waste, the Palm Oil Mill have shown their compliance toward the Environmental Quality Act 1974 (Schedule Wastes) Regulations 2005.

Summary record of the waste dispose as below: -



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

**In Compliance**    ☒ **Yes**                      ☐ No                      ☐ Not Applicable

**Indicator 3** The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Wastes) Regulations, 2005.

**Summary** The company has established SOP for handling used chemicals at Palm Oil Mill. The SOP titled "Chemical Safety Management" Document ID SD/SDP/PSQM (ESH)/202-OH4 dated 26<sup>th</sup> February 2015. The procedure is a guideline to define the requirement for the procurement, transportation, receiving, handling, storage, disposal and training on the handling / use of chemicals. The scope of procedure shall apply to all chemicals (hazardous and non – hazardous) procured and used by operating unit that have related activities and facilities.

Requirement and procedure covers :

- 1) Procurement of chemicals
- 2) Transport of chemicals
- 3) Receiving of chemicals
- 4) Storage of chemical
- 5) Handling of chemicals
- 6) Disposal of chemicals wastes
- 7) Training
- 8) Maintenance of equipment's

The emergency shower and eye wash were verified to be available and in proper working order at the pesticide mixing area. The Palm Oil Mill having adequate facilities for mixing of pesticides and the emergency shower and eye wash were verified to be available and in proper working order at the pesticide mixing area. The PMU has adequate facilities for mixing of pesticides and cleaning up after work. There are suitable storage areas for PPE cleaning up after work. There are suitable storage areas for PPE in the facility.

All precautions attached to the products were explained to the operators. The Palm Oil Mill has conducted training to staffs and workers particularly on the subject of chemical handling. The training was recorded in the various trainings record, complete with attendance records, training materials and photographs of the training. The record of training provided to the sprayer as below;

- Training on scheduled waste Training by SQMO (Sustainability Quality Management Officer) on 15<sup>th</sup> March 2020 attended by 26 including Assistant, Staff and Palm Oil Mill Worker. Sighted the training material with attendance.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 4** Domestic waste should be disposed as such to minimise the risk of contamination of the environment and watercourse.

**Summary** Domestic waste from Kok Foh Palm Oil have been collected by Disposal Contractor appointed by Sime Darby Plantation Berhad namely MTJJ Company (Third Party). Collection three time a week and being disposed to Government Land fill area.

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

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Criterion 4 Reduction of pollution and emission including greenhouse gas**

**Indicator 1** An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.

**Summary** The Palm Oil Mill polluting activities are identified and evaluated in its EIA and EIE and pollution prevention plans are in place. Sighted palm GHG Kok Foh Report 2019 prepared using GHG calculator version by company's sustainability department. The calculation involves the Palm Oil Mill and all its supply bases. Land conversion, CO2 emission from fertilizer, N2O emission, fuel consumption, crop sequestration, etc. The final emission is stated as 0.2 tCO2e/t FFB.

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

Identification of significant pollutants and greenhouse gas (GHG) emissions has been conducted for the followings: -

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

Summary Emission in 2020 for SOU 16 Kok Foh Palm Oil Mill as below: -



Product	tCO <sub>2</sub> e / t Product
CPO	1.15
PK	1.15
PKO	0.00
PKE	0.00

**In Compliance**    ☒ **Yes**                      ☐ No                      ☐ Not Applicable

**Indicator 2** An action plan to reduce identified significant pollutants and emissions shall be established and implemented.

### Summary

The significant pollutants and greenhouse gas (GHG) emissions had been identified and documented and plans to reduce or minimize were being implemented.

The Palm Oil Mill Management has been identify all the process / area of activity in the Palm Oil Mill and documented the other significant pollutants in Environmental Management Plan Year 2020. The plan has prepared by Mr. Mohd Khairi Abdul Kudus (Senior Assistant Manager POM) and verified by Mr. Abdul Halim Shahor (Senior Manager POM). The Environmental Management Plan include:

- 1) Environmental Risk Management Plan
- 2) Waste Management Plan
- 3) Water Management Plan
- 4) HCV Management Plan
- 5) Pollution Prevention Plan
- 6) Chemical Reduction Plan
- 7) Energy Management Plan

Objective	Category	Types / Location	Actions
Efficiency the usage of non-renewable and renewable energy	Electricity	Workers housing complex, office, Palm Oil Mill compound	Worker housing inspection to ensure no illegal wiring  To educate on electricity saving practices
	Diesel	Transport Machineries	Preventive maintenance program for POM vehicle  Educate workers on fuel saving practices  To reduce / minimize of diesel used
	Fibre and Shell	Palm Oil Mill Compound	Fuel ration of 90% fibre and 10% shell

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Indicator 3** Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations

**Summary** Based on the Jadual Pematuaan (ASNS(B) 31/152/000/005) No. Lesen : 006013 issued by DOE for period of 1<sup>st</sup> July 2020 till 30<sup>th</sup> June 2021 mentioned about Pengurusan Efluen, Para 5. Kepekatan Oksigen Biokimia Yang Diperlukan (BOD, 3 hari, 30°C) di takat pelepasan hendaklah tidak melebihi 5000mg/l.

Sighted the Effluent Analysis Test report as follows:

- Test Report No : EP306/2020
- Mill/Factory/Client : The China Engineers (M) Sdn. Bhd. – Kok Foh Palm Oil Mill
- Date Received : 07/09/2020
- Date Sampled : 02/09/2020
- Date Tested : 07/9/2020
- Date Issued : 17/09/2020

Lab Code	Sampled Reference	pH (25° C)	BOD (mg/L)	SS (mg/L)	TN (mg/L)	AN (mg/L)	O & G (mg/L)
C-W-EP-202009-001506	Final Discharge (Land Application)	7.9	450	1440	479	308	8

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

## **Criterion 5 Natural water resources**

**Indicator 1** The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:

- Assessment of water usage and sources.
- Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.
- Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc).

**Summary** Sighted the Water management plan year 2020 incorporated in the Environment Management Plan prepared by Mr. Mohd Khairi Abdul Kudus (Senior Assistant Manager POM) and verified by Mr. Abdul Halim Shahor (Senior Manager POM). Palm Oil Mill have established the Water Management Plan to monitor the source of water, description, management and monitoring plan to ensure the water are safe and protected. The source of water for domestic used is from treated water sourced from the own reservoir maintained by Kok Foh Palm Oil Mill.

Water Management Plan as below;

Objective	Category	Type / Location	Action	Frequency
Contingency during water shortage	Water shortage Dry spell Severe water pollution	-	Purchasing water from vendor	As and when needed
To monitor the usage of treated water in monthly basis	Daily consumption	Water treatment plan	Water analysis result by R&D	Monthly
	Pond/Reservoir/Wetland	Water catchment	Water analysis result by DELCO	Twice a year

Sighted Final report drinking water analysis conducted by ECOLAB as follows;

- Sample Number : SW 203734
- Date sampled : 20<sup>th</sup> February 2020
- Date received : 25<sup>th</sup> February 2020
- Date completed : 5<sup>th</sup> March 2020
- Date authorized : 5<sup>th</sup> March 2020

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

Water analysis test report taken at the Water Treatment Plan :



Sample Ref	pH (25° C)	TDS (mg/l)	Turb (NTU)	Chloride (mg/l)	AI (mg/l)
Sample 1 – Waterways	5.5	96	2.2	25	0.238
Sample 2 – After treatment process	6.4	204	2.5	43	0.285
Sample 3 – For Drinking Process	6.4	80	1.2	43	0.307

Water analysis test report under POM :

Sample Ref	pH	BOD (mg/l)	COD (mg/l)	SS (mg/l)	AN (mg/l)	DO (mg/l)	P (mg/l)
Waterway	5.7	10	68	36	< 1	3.02	ND

Daily water consumption record:

- Sighted the daily domestic water flowmeter record for month of October 2020 maintain by Kok Foh Palm Oil Mill. The water discharge to Kok Foh Estate and Kok Foh Palm Oil Mill was monitored and record by the Palm Oil Mill Staff on monthly basis.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 2** Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.

### Summary

The POME is sent for land irrigation. The BOD is below approved limit by DOE for land irrigation.

Sighted the Effluent Analysis Test report as follows;

- Test Report No : EP306/2020
- Mill/Factory/Client : The China Engineers (M) Sdn. Bhd. – Kok Foh Palm Oil Mill
- Date Received : 07/09/2020
- Date Sampled : 02/09/2020
- Date Tested : 07/9/2020
- Date Issued : 17/09/2020

Lab Code	Sampled Reference	pH (25° C)	BOD (mg/L)	SS (mg/L)	TN (mg/L)	AN (mg/L)	O & G (mg/L)
C-W-EP-202009-001506	Final Discharge (Land Application)	7.9	450	1440	479	308	8

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

## 2.6 Principle 6 : Best practices

### Criterion 1 Mill management

**Indicator 1** Standard operating procedures shall be appropriately documented and consistently implemented and monitored.

**Summary** Mill capacity 45 MT/Hr – Sterilization is by vertical sterilizer. The mill has implemented Good Milling Practice (GMP) as seen from visit to the mill and seen from the document and also interviewing the workers.

Palm Oil Mill has 4 types of Manuals-

- 1) Mill Quality Management System (Standard Operating Procedure)
- 2) Mill Quality Management System (Standard Operation Manual)
- 3) Occupational Safety and Health Manual
- 4) Sustainable Plantation Management System

These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from the reception, sterilization, threshing, pressing, clarification, effluent, laboratory, workshop and etc.

The document was well maintained and implemented. As evidence, mill daily operations is referring the Mill Quality Management System (Standard Operating Procedure). The SOP includes:

- 1) Reception station
- 2) Sterilization station
- 3) Threshing station
- 4) Pressing station
- 5) Clarification station
- 6) Kernel Recovery station
- 7) Boiler station

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 2** All palm oil mills shall implement best practices.

**Summary** The mill is not certified by MPOB Codes of Milling Practice (CoP). However, mill has implemented Good Milling Practice (GMP) as per their own SOP's.

As evidence, the mill is operating in accordance to Jadual Pematuhan – Syarat-Syarat Lesen Premis Minyak Kelapa Sawit Mentah, Jabatan Alam Sekitar Ref No. ASNS(B)31/152/000/005; License No: 006013; valid until 30.06.2021. The mill is complying with the BOD limit stipulated under "Pengurusan Efluen – Kepekatan Oksigen Biokimia Yang Diperlukan (BOD, 3 hari, 30°C) tidak melebihi 5000mg/l".

Final discharge analysis carried out on monthly basis. Sighted water discharge (furrow) to trenches monitoring for Kok Foh POM.



**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Criterion 2 Economic and financial viability plan**

**Indicator 1** A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.

**Summary** Kok Foh POM has an annual budget for the financial year 2019/2020. The palm oil mill budget includes the projected FFB to be processed, CPO and PK production for the period of three years from 2019/2020 until 2021/2022.

It is also incorporated items such as general charges, mill maintenance, process shift labour, general services, processing cost, fixed assets, etc. Sighted documented Business and Management Plan prepared by Mr. Abdul Halim bin Shahor (Sr. Mill Manager).

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Criterion 3 Transparent and fair price dealing,**

**Indicator 1** Pricing mechanisms for the products and other services shall be documented and effectively implemented.

**Summary** Pricing of the contract works such as transporting of FFB and PK, Purchase of FFB from outside suppliers is determined by the HQ (Procurement Department) and treated as highly confidential information.

For others, pricing mechanism is set thru open tender process. Announcement will be made available to all contractors and they will deliver their quotation to the estate. Sime Darby Plantations management will decide the contractors.

The contractors have signed an agreement with the estate to provide services. The agreement has detailed the pricing mechanism for the service offered.

**In Compliance** ☒ **Yes** ☐ **No** ☐ **Not Applicable**

**Indicator 2** All contracts shall be fair, legal and transparent and agreed payments shall be made in a timely manner.

**Summary** All the contract agreement are kept in the file. Sighted the contract that sign by contractors/suppliers with the company and payment record shown that the company pay fee to the contractors/suppliers according the agreement.

As evidence, sighted the Contract Agreement between mill with:

- FELCRA Berhad
- Eng Huat Latex Concentrate Sdn Bhd
- Cheong Wing Chan Sdn
- Bukit Palong Plantations Sdn Bhd

Payment will be paid 30 – 60 days after the mill received the invoice from contractors.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Criterion 4 Contractor**

**Indicator 1** In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.

**Summary** The contractors have been informed that the estate is certified under the MSPO certification process. The contractor has been briefed by the estate management to comply with the MSPO standard requirements.

As evidence, sighted the contract agreement/payment slip for their workers (contractors). Salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker.

Workers interviewed confirmed that they are being paid more than the stipulated minimum wage and that they understand all the deductions being made.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 2** The management shall provide evidence of agreed contracts with the contractor.

**Summary** All the contractors aware that mill already certified under MSPO. Therefore, the contractor has been instructed by mill management to follow the MSPO standard requirement when carrying out their work in the mill premise.

All the contract agreements are kept in contractor's file. Sighted the contract that sign by contractors with the company.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

**Indicator 3** The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.

**Summary** The mill was audited by Global Gateway Certifications Sdn Bhd MSPO auditor on 22<sup>nd</sup> October 2020. Sighted audit plan dated 25<sup>th</sup> November 2018 (6<sup>th</sup> Revised) which have been accepted address to Madam Shylaja Devi Vasudevan Nair. All the auditors are qualified MSPO auditor. As per agreed, the Sime Darby Plantation Berhad accept the GGC MSPO Auditors to verify through a physical inspection if required for audit purposed.

**In Compliance** ☒ **Yes** ☐ No ☐ Not Applicable

## 2.7 Details of Audit Findings

### Details Non-Conformity

- See Appendix B -

### Details of Area of Concern

- See Appendix B -

### Details of Noteworthy / Positive Findings

- 1) The mill management has demonstrated fully commitment during the entire audit process.
- 2) Top management continuously establishes directions for the middle and upper management to execute in ways to comply with the MSPO management system in future.
- 3) Good relationship being maintained with surrounding smallholders and villages.
- 4) Good positive feedback received from internal and external stakeholders.
- 5) Interview with sampled workers revealed, the mill management impose strict control measure on safety compliances.
- 6) The storage facilities for schedule waste, chemical and POL well-constructed, proper signage clearly displayed, and emergency preparedness well implemented.
- 7) Signages throughout office, chemical area and in the field sites, effectively maintained and appropriate to the needs of the process.

## Appendix A: Audit Plan

<b>AGENDA</b>				
<b>Date</b>	<b>Time</b>	<b>Subjects</b>	<b>Lead Auditor</b>	<b>Auditor</b>
18 <sup>th</sup> October 2020	TBA	➤ <b>Travelling to Segamat, Johor.</b>	MS	IBI MRB
19 <sup>th</sup> October 2020	08:00 – 09:00	➤ <b>Centralize Opening Meeting at Muar River Estate:</b> <ul style="list-style-type: none"> <li>Presentation by the manager/coordinator</li> <li>Presentation by Lead Auditor.</li> </ul> ➤ Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation – where applicable).	MS	IBI MRB
	09:00 – 13:00	<b>Muar River Estate</b> <ul style="list-style-type: none"> <li>➤ <b>Document Audit:</b> <ul style="list-style-type: none"> <li>Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</li> </ul> </li> </ul>	MS	IBI MRB
	10:30 – 12:30	➤ <b>Estate inspection:</b> <ul style="list-style-type: none"> <li>Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc.</li> </ul>	MS	IBI MRB
	13:00 – 14:00	➤ <b>Lunch/Rest</b>	MS	IBI MRB
	14:00 – 16:00	➤ <b>Continue document review</b> <ul style="list-style-type: none"> <li>Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</li> </ul>	MS	IBI MRB
	16:00 – 17:00	➤ Verify any outstanding issues, auditor discussion and end of audit for day 1.	MS	IBI MRB

<b>AGENDA</b>				
<b>Date</b>	<b>Time</b>	<b>Subjects</b>	<b>Lead Auditor</b>	<b>Auditor</b>
	08:00 – 13:00	<b>Sg. Senarut Estate</b> <ul style="list-style-type: none"> <li>➤ <b>Document Audit:</b></li> </ul>	MS	IBI MRB



20 <sup>th</sup> October 2020		<ul style="list-style-type: none"> <li>Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</li> </ul>		
	10:30 – 12:30	<ul style="list-style-type: none"> <li>➤ <b>Estate inspection:</b></li> <li>Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc.</li> </ul>	MS	IBI MRB
	13:00 – 14:00	➤ <b>Lunch/Rest</b>	MS	IBI MRB
	14:00 – 16:00	<ul style="list-style-type: none"> <li>➤ <b>Continue document review</b></li> <li>Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</li> </ul>	MS	IBI MRB
	16:00 – 17:00	➤ Verify any outstanding issues, auditor discussion and end of audit for day 2.	MS	IBI MRB

<b>AGENDA</b>				
<b>Date</b>	<b>Time</b>	<b>Subjects</b>	<b>Lead Auditor</b>	<b>Auditor</b>
21 <sup>st</sup> October 2020	08:00 – 13:00	<b>Sg Sebalang Estate</b> <ul style="list-style-type: none"> <li>➤ <b>Document Audit:</b></li> <li>Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</li> </ul>	MS	IBI MRB
	10:30 – 12:30	<ul style="list-style-type: none"> <li>➤ <b>Estate inspection:</b></li> <li>Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc.</li> </ul>	MS	IBI MRB
	13:00 – 14:00	➤ <b>Lunch/Rest</b>	MS	IBI MRB
	14:00 – 16:00	<ul style="list-style-type: none"> <li>➤ <b>Continue document review</b></li> <li>Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and</li> </ul>	MS	IBI MRB

		records, payment records, complaint records, workers records, training records, permits, CIP, etc.		
	16:00 – 17:00	➤ Verify any outstanding issues, auditor discussion and end of audit for day 3.	MS	IBI MRB

<b>AGENDA</b>				
<b>Date</b>	<b>Time</b>	<b>Subjects</b>	<b>Lead Auditor</b>	<b>Auditor</b>
22 <sup>nd</sup> October 2020	08:00 – 13:00	<b>SOU 16 Kok Foh POM</b> <ul style="list-style-type: none"> <li>➤ <b>Document Audit:</b> <ul style="list-style-type: none"> <li>Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</li> </ul> </li> </ul>	MS	IBI MRB
	10:30 – 12:30	<ul style="list-style-type: none"> <li>➤ <b>Mill Inspection:</b> <ul style="list-style-type: none"> <li>Workshop, Laboratory, Environment, OHS, Chemical Stores, Workers Welfare and Interview, Clinic, Landfill, Mill Housing, Biogas System, WWTP, Schedule Waste, POME.</li> </ul> </li> </ul>	MS	IBI MRB
	13:00 – 14:00	➤ <b>Lunch/Rest</b>	MS	IBI MRB
	14:00 – 15:30	<ul style="list-style-type: none"> <li>➤ <b>Continue document review</b> <ul style="list-style-type: none"> <li>Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</li> </ul> </li> </ul>	MS	IBI MRB
	15:30 – 16:00	➤ Verify any outstanding issues and auditor discussion.	MS	IBI MRB
	16:00 – 17:00	<ul style="list-style-type: none"> <li>➤ <b>Centralize Closing Meeting at SOU 16 Kok Foh POM:</b> <ul style="list-style-type: none"> <li>Chaired by the audit Lead Auditor</li> <li>Welcome and introduction by the Lead Auditor</li> <li>Presentation of findings by the audit team</li> <li>Questions &amp; answers and Final summary by Lead Auditor</li> </ul> </li> <li>➤ <b>End of assessment</b></li> </ul>	MS	IBI MRB

## Appendix B : Non-Conformity details

### Non-Conformities Identified During This Audit

<b>Major Nonconformities:</b>	Non-were raised during this audit.
<b>Minor Nonconformities:</b>	Non-were raised during this audit.
<b>Area of Concern:</b>	Non-were raised during this audit.

### Non-Conformities Identified During Previous Audit [ASA2]

<b>Major Nonconformities:</b>	Non-were raised during this audit.
<b>Minor Nonconformities:</b>	Non-were raised during this audit.
<b>Area of Concern:</b>	Non-were raised during this audit.

## Appendix C: List of Stakeholders Contacted

### Attendance List

#### Internal Stakeholders

- 1) Kok Foh POM management team and staff
- 2) Gender Committee Representatives
- 3) Male and Female workers
- 4) Workers Representatives
- 5) Foreign Workers Representatives

#### External Stakeholders

- 1) Contractors
- 2) Suppliers