

# Sime Darby Plantation Berhad

## Update Session

**Ban (Finding) Issued by the United States Customs and Border Protection  
on Sime Darby Plantation**

*21 March 2022*

**2 CENTURIES  
OF LEADERSHIP**  
[www.simedarbyplantation.com](http://www.simedarbyplantation.com)

**200**  
OLDER. WISER. BETTER  
EST. 1821

**Sime  
Darby**  
Plantation

# Setting the Context



## HOW IT ALL STARTED

### LIBERTY SHARED

CREATING AN ENVIRONMENT SAFE FROM TRAFFICKING

**APR 2020** A Hong Kong based NGO's petition submitted to USCBP concerning alleged conditions of forced labour and child labour experienced by workers on plantation/estates owned and/or run by Sime Darby Plantation Berhad (SDP)



### USCBP

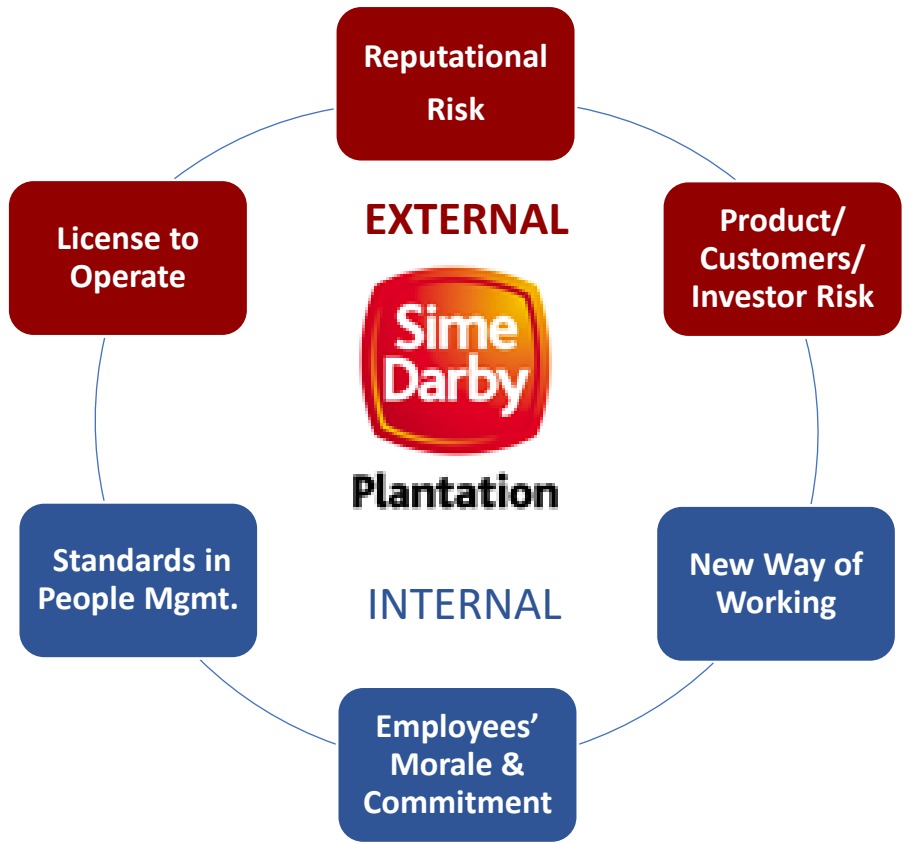


**DEC 2020** United States Customs & Border Protection (USCBP) issues Withhold Release Order (WRO) to SDP

**JAN 2022** USCBP issues Notice of Finding on SDP

## HOW WE ARE IMPACTED

Far reaching implications hence we need to act fast!



## OUR EXPERT PARTNERS

We endeavor to find solutions by working with experts in the field



*Ethical Recruitment Specialist – Andy Hall*

# Governance Structure & Objectives

SDP embarked on a continuous improvement plan to address any gaps in adherence to the 11 ILO indicators of Forced Labour



## The Continuous Improvement Plan



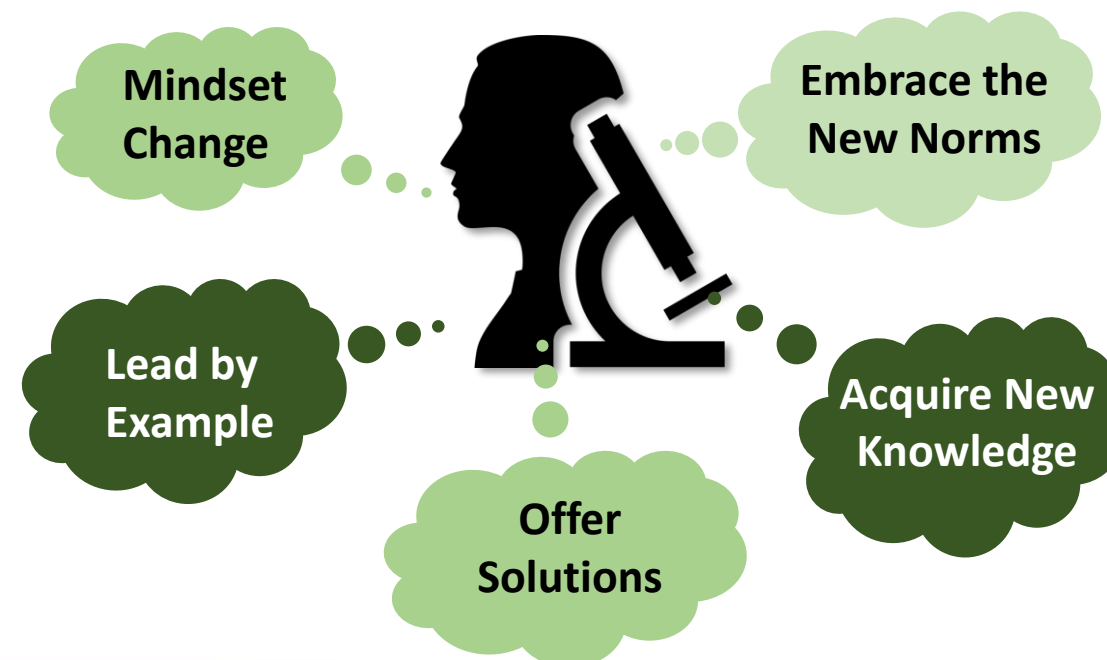
### Objective:

To ensure we achieve the expected standards required under the 11 ILO indicators of Forced Labour through an effective and practical continuous improvement plan.

## The Governance Structure



## To Be Part Of The Solution



# OVERVIEW - WORKSTREAM



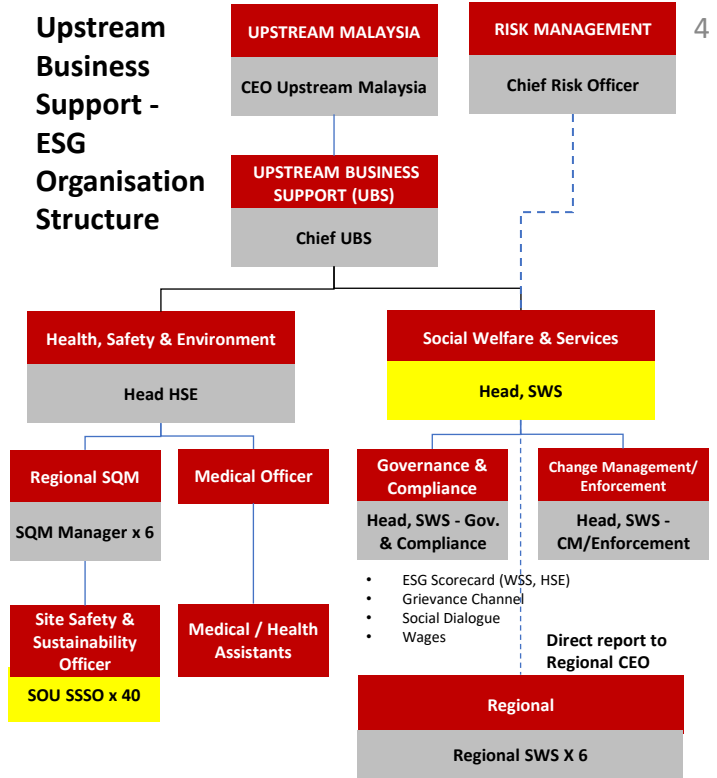
7 workstreams established to address all 11 ILO indicators as well as to strengthen overall governance mechanisms for human rights

- Workstream 1**  
Grievance Channel
- Workstream 2**  
OSH & Workers Housing
- Workstream 3**  
Social Dialogue
- Workstream 4**  
Estate Issues - FLIs
- Workstream 5**  
Operational Intervention
- Workstream 6**  
Wage Structure
- Workstream 7**  
KPI

**CONTINUOUS IMPROVEMENT PLANS**

To date additional resources have been deployed arising from the Continuous improvement Initiatives under the Workstreams:

- Head, Social Welfare & Services – recruitment in progress
- 40 Site Safety & Sustainability Officers (SSSO) recruited
- 10 handymen recruited to expedite accommodation repairs & maintenance works.



11 ILO INDICATORS	Abuse of Vulnerability	ID Retention	Movement Restriction	Excessive OT	Abusive Living and Working Condition	Deception	Isolation	Debt Bondage	Withhold wages	Physical & sexual violence	Intimidation
1 : Grievance Channel	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓
2 : OSH & Workers Housing					✓						
3 : Social Dialogue	✓	✓	✓	✓	✓	✓	✓			✓	✓
4 : Estate Issues- FLI	✓		✓			✓	✓			✓	✓
5 : Operational Intervention	✓	✓	✓			✓		✓			
6. Wage Structure				✓					✓		

# Continuous Improvement

## Workstream 1 : Grievance Channel

### Key Activities

- ❖ **Trusted and organised** channel for workers to raise queries, complaints, grievances.
- ❖ **Fair and Unbiased** investigation
- ❖ **Trained** team
- ❖ **Satisfactorily Resolved** issues

## Workstream Outcome

- G1** Improved oversight of grievances and accountability for grievance handling.
- G2** Workers safeguarding is guaranteed.
- G3** Improved management capability to investigate grievances effectively.
- G4** Build back trust in management's capability to investigate and resolve grievances

[Link to 11 ILO Indicators of Forced Labour](#)

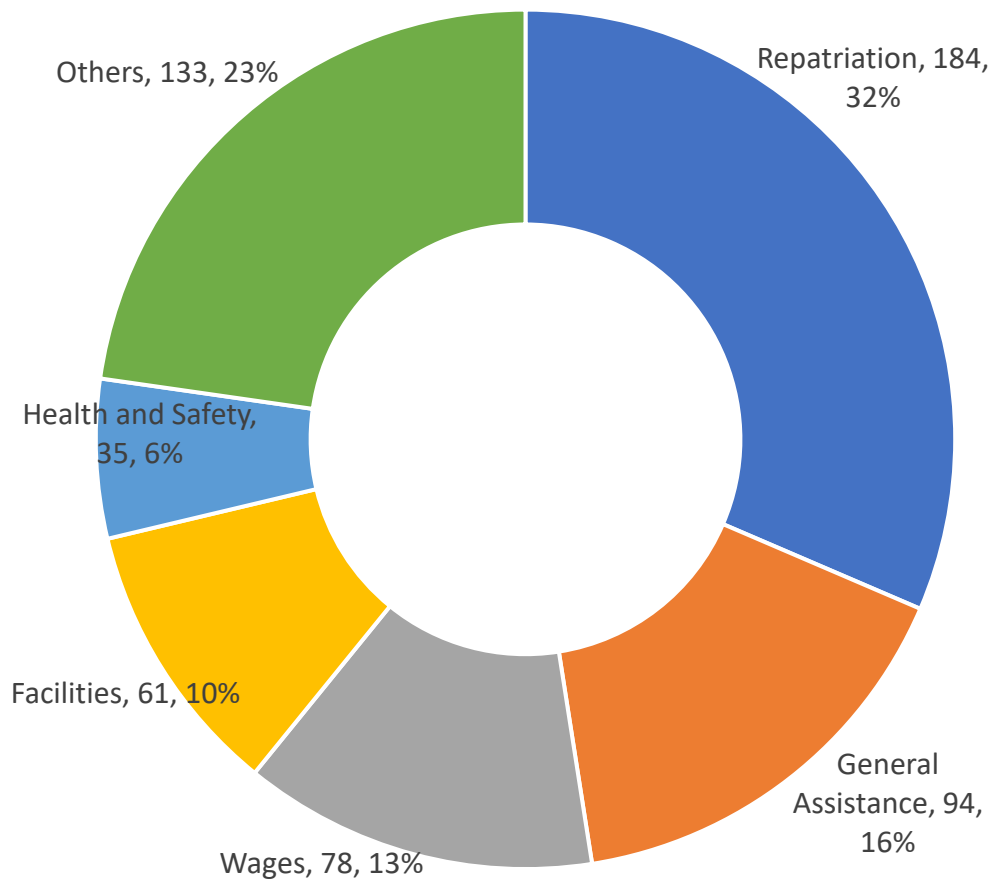
Abuse of Vulnerability	ID retention	Movement Restriction	Excessive OT	Abusive Living and Working Condition	Deception	Isolation	Debt Bondage	Withhold wages	Physical & sexual violence	Intimidation
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# Grievances Received

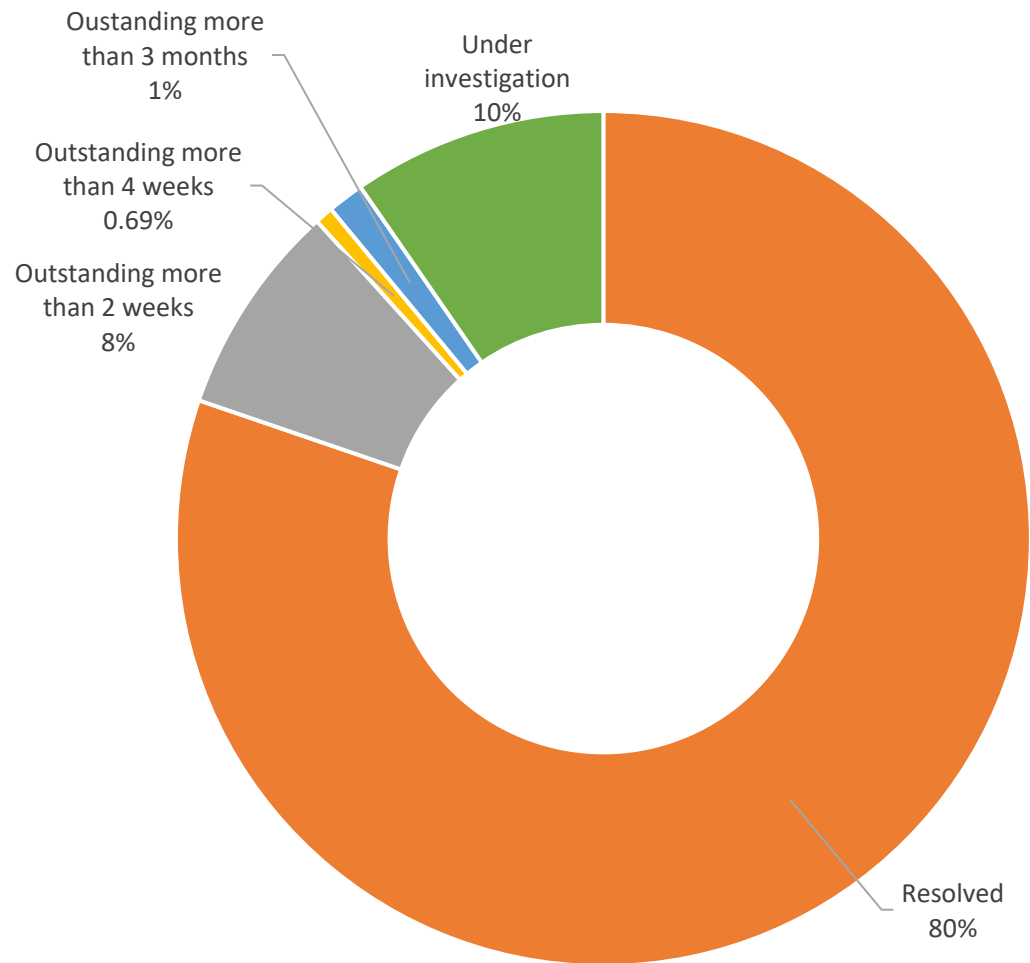
August 2021 – 14 March 2022



## By Type of Grievances



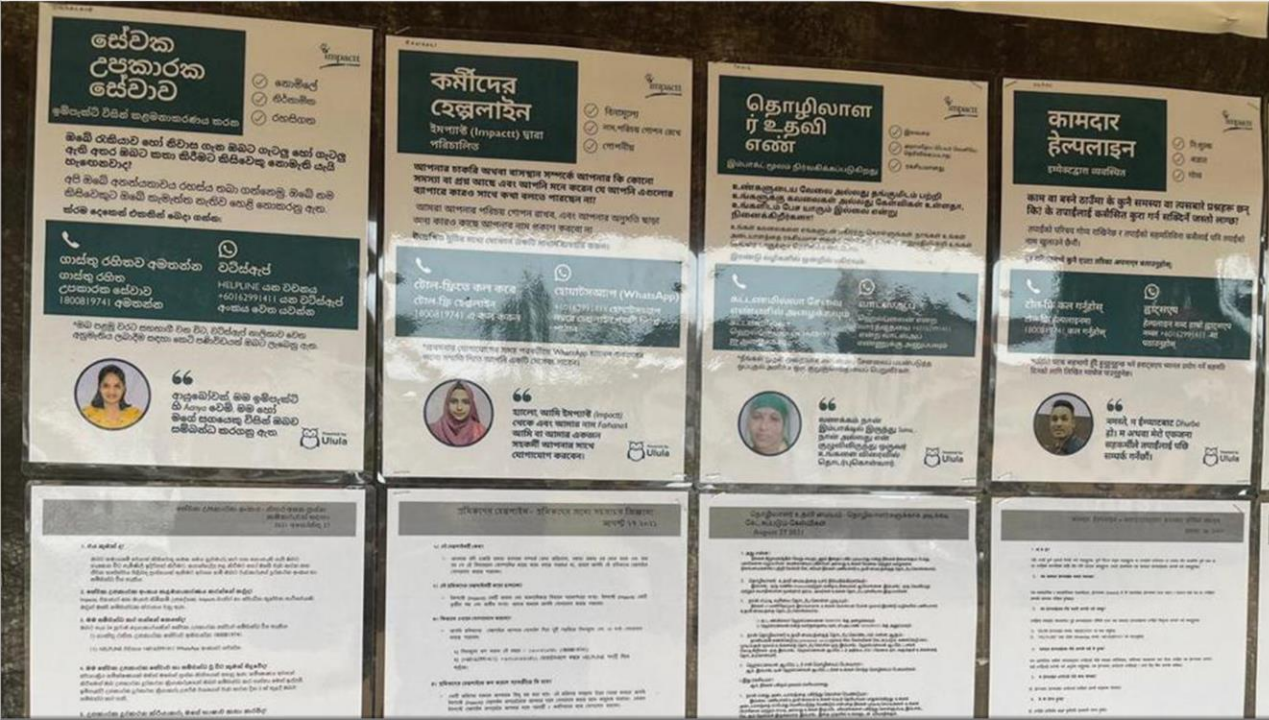
## Status of Grievances



General assistance include: request for transfers, breach of policies/ company procedures. Not necessarily forced labour related



# Raising awareness on grievance channels





# Continuous Improvement

## Workstream 2 : OSH & Workers Housing

### Key Activities

- ❖ **Hazard** identification at the workplace process incorporates **worker interaction / input**
- ❖ Enhanced process for **medical access**
- ❖ Enhanced **housing repair** and maintenance policy & dedicated budget
- ❖ Housing complaints reporting & monitoring app

## Workstream Outcome

**W1**

Worker Centric Health and Safety, focused on salient/significant field and mill hazards

**W2**

Accommodations well maintained with necessary repairs done in a timely manner based on clear SOP

**W3**

Clear, effective and speedy access to medical care (for Occupational issues) at the OU level

[Link to 11 ILO Indicators of Forced Labour](#)

Abuse of  
Vulnerability

ID retention

Movement  
Restriction

Excessive OT

**Abusive  
Living and  
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Condition**

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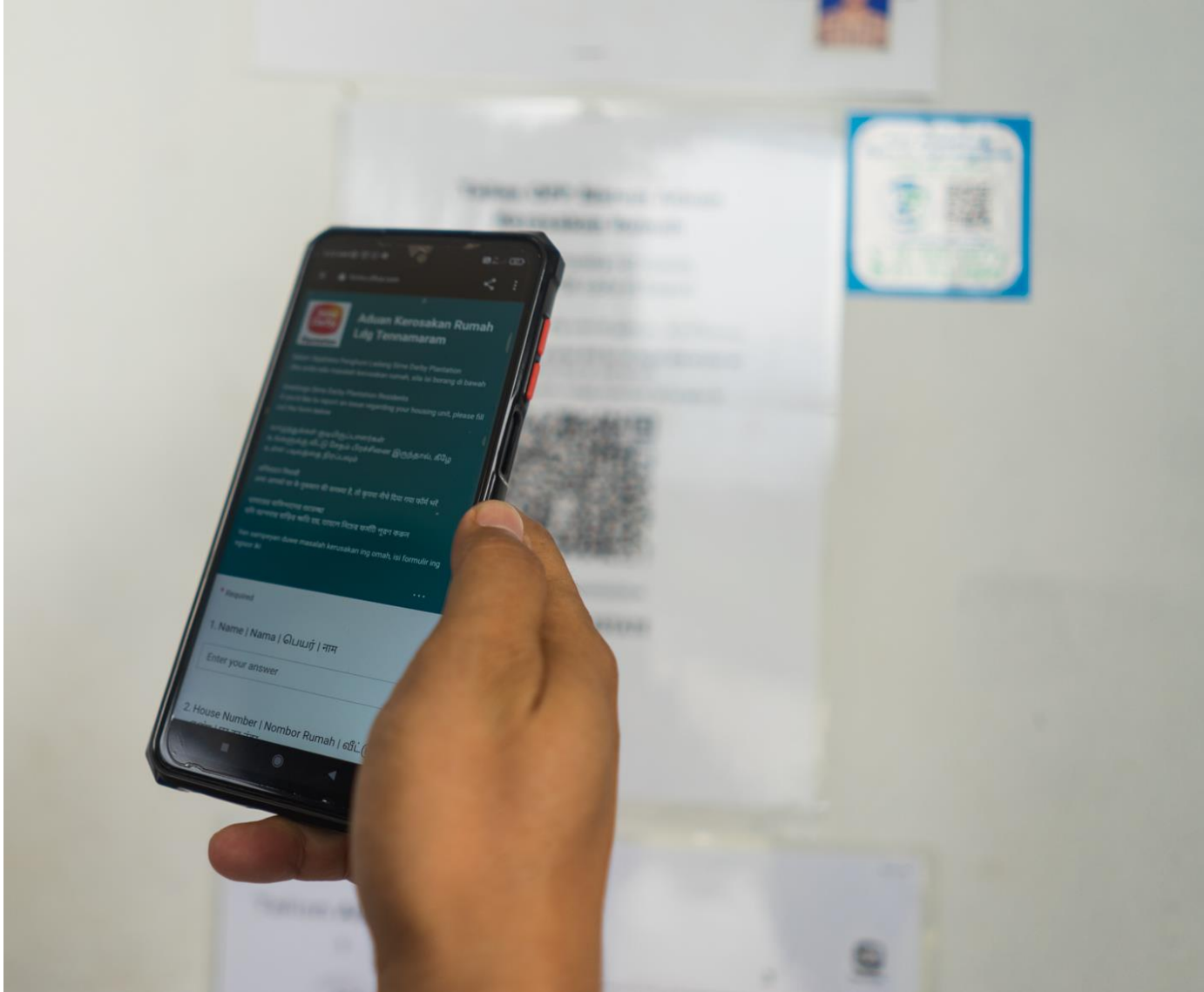
# Workers Housing

in SDP's Tennemaram Estate, Selangor





# Mobile Application: Oil Palm Pal



## Aduan Kerosakan Rumah Ldg East

Salam Sejahtera Penghuni Ladang Sime Darby Plantation  
Jika anda ada masalah kerosakan rumah, sila isi borang di bawah

Greetings Sime Darby Plantation Residents  
If you'd like to report an issue regarding your housing unit, please fill out the form below

வாழ்துக்கள் குடியிருப்பாளர்கள்  
உங்களுக்கு வீட்டு சேதம் பிரச்சினை இருந்தால், கீழே உள்ள படிவத்தை நிரப்பவும்

अभिवादन निवासी  
अगर आपको घर के नुकसान की समस्या है, तो कृपया नीचे दिया गया फॉर्म भरें

খামারের বাসিন্দাদের শুভেচ্ছা  
যদি আপনার বাড়ির ক্ষতি হয়, তাহলে নিচের ফর্মটি পূরণ করুন

Yen sampeyan duwe masalah kerusakan ing omah, isi formulir ing ngisor iki

\* Required

1. Name | Nama | பெயர் | नाम \*

2. House Number | Nombor Rumah | வீட்டு எண் | घर का नंबर \*

3. Damage Complaint | Aduan Kerosakan | சேத வகை | क्षति का प्रकार \*



# Continuous Improvement

## Workstream 3 : Social Dialogue

### Key Activities

- ❖ Facilitate appointment of **OU level workers' representation** per nationality
- ❖ Establish **OU level** management and workers **social dialogue task force**
- ❖ Social dialogue rolled-out to 152 OUs and used as a **2-way communication & issue resolution platform** between site management & workers
- ❖ **Online tracker system** to track issue resolution

## Workstream Outcome

- S1** OU level workers' representation per nationality
- S2** Establish Active and Independent OU level management and workers representation social dialogue task force.
- S3** Enable co-creation between workers and management to improve workplace and living conditions - starting from improvements related to ILO FL 11 Indicators
- S4** Social Dialogue to support monitoring of the overall remediation plan and implementation

[Link to 11 ILO Indicators of Forced Labour](#)

Abuse of Vulnerability	ID retention	Movement Restriction	Excessive OT	Abusive Living and Working Condition	Deception	Isolation	Debt Bondage	Withhold wages	Physical & sexual violence	Intimidation
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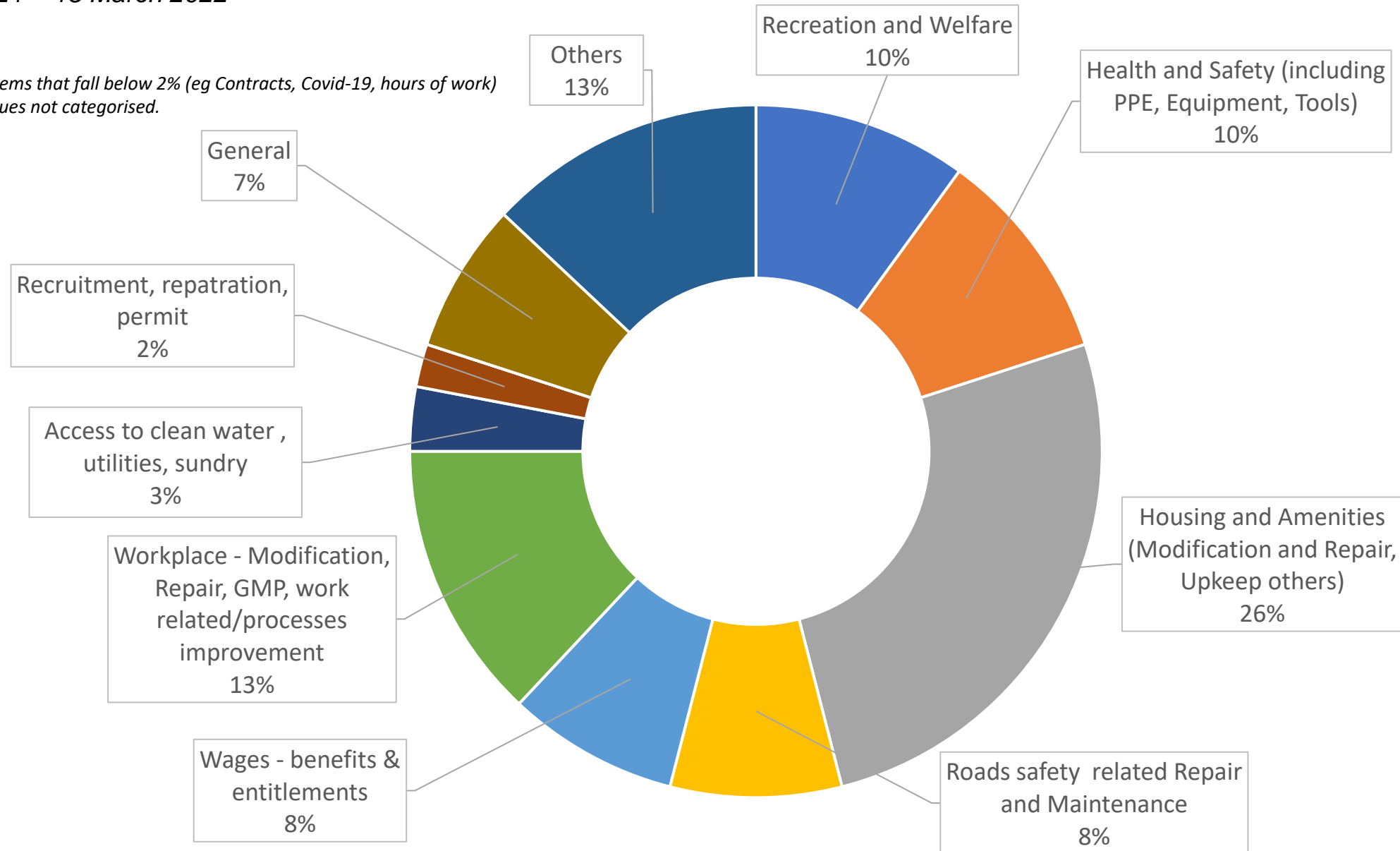
# Social Dialogue: Issues by Categories

August 2021 – 15 March 2022



Notes:

- 1. General - Items that fall below 2% (eg Contracts, Covid-19, hours of work)
- 2. Others - Issues not categorised.

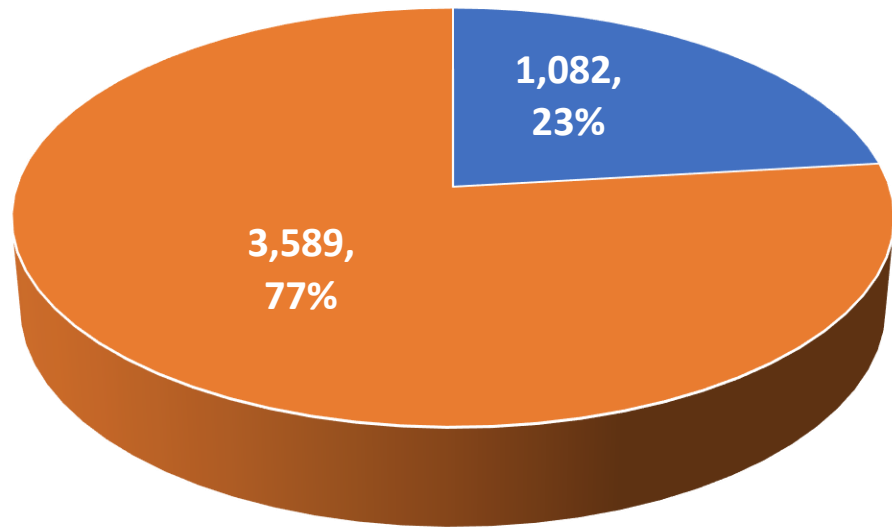


# Social Dialogue: Status of Issues Received

August 2021 – 15 March 2022

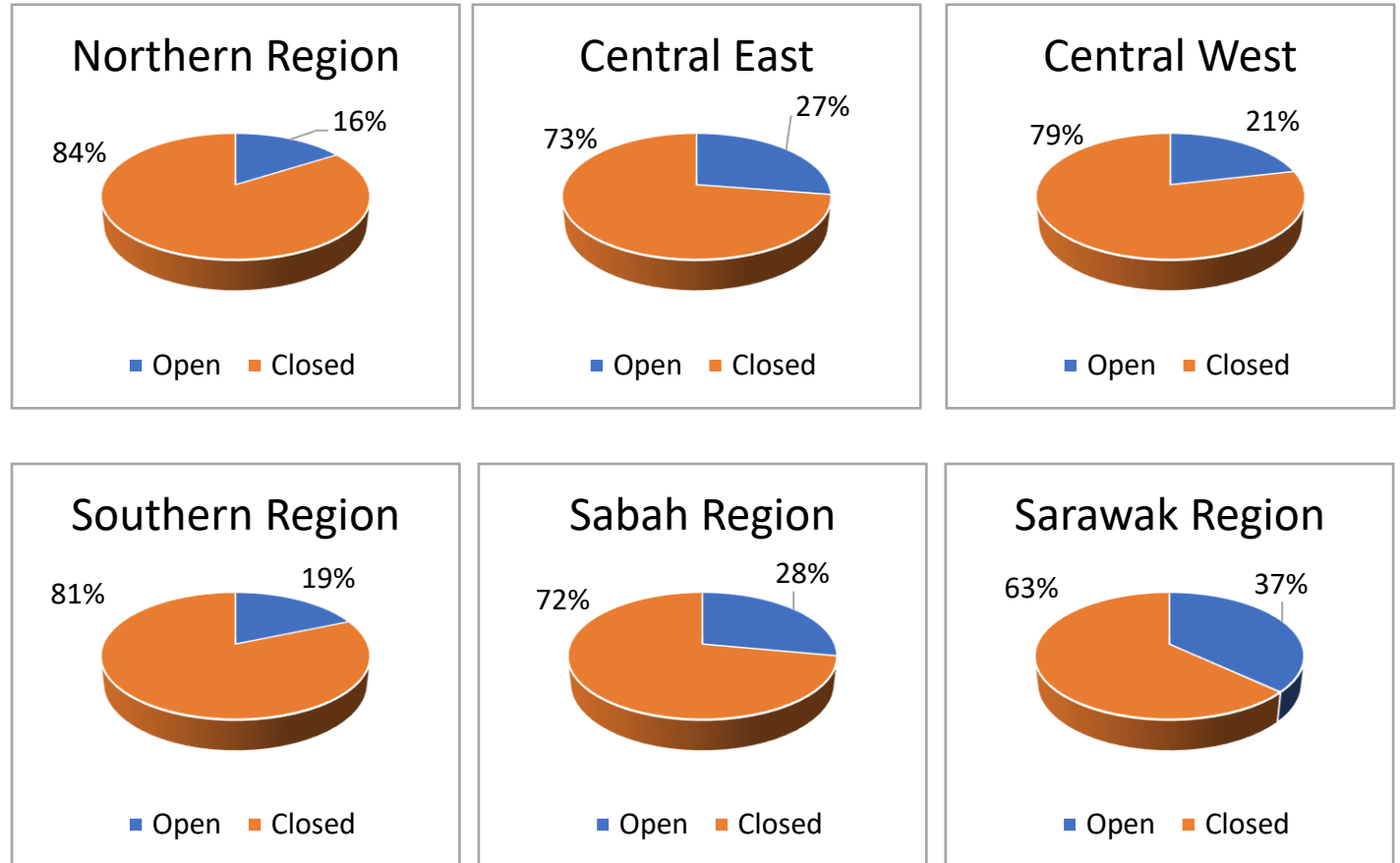


## SDP Malaysia



■ Open ■ Closed

## By Region





# Social Dialogues with Worker Reps.



SDP St. Helier Estate, Central West Region



SDP Bkt Talang Estate, Central East Region



SDP Anak Kulim Estate, Northern Region



SDP Hadapan Mill, Southern Region



SDP Segaliud Estate, Sabah



SDP Takau Estate, Sarawak





# Continuous Improvement

## Workstream 4 : Estate Issues - FLI Related

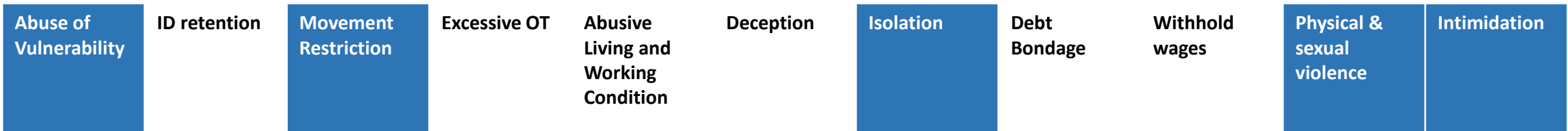
### Key Activities

- ❖ **Movement and Medical Access** - SOP and communications
- ❖ Managing **isolation**: Facilities & Programme; Transportation
- ❖ **Not employing undocumented workers**
- ❖ **Enhanced SOPs on contractors/ vendors** including ensuring that all contract workers are legal in possession of their passports & are at least paid minimum wages
- ❖ **Undocumented Children** – assisting in documentation
- ❖ **Bullying & Harassment** – SOP, Training, Culture

### Workstream Outcome

E1	Worker can access government hospitals when they feel ill and can get medical leave
E2	All migrant children have clear path to legal status or citizenship
E3	SDP does not employ undocumented workers (directly or via contractors / subcontractors)
E4	Workers can freely leave the estates/mills barring reasonable restrictions
E5	Social visit pass' workers afforded same rights and entitlements as regular workers
E6	Workers operate in a harassment/abuse/intimidation-free workplace

[Link to 11 ILO Indicators of Forced Labour](#)



# Medical Facilities





# Recreational Areas & Activities





# HUMANA SCHOOL

in SDP's Sandakan Bay Estate, Sabah



# COMMUNITY LEARNING CENTRE

in SDP's Rajawali Derawan Estate, Sarawak





# Continuous Improvement

## Workstream 5 : Operational Intervention

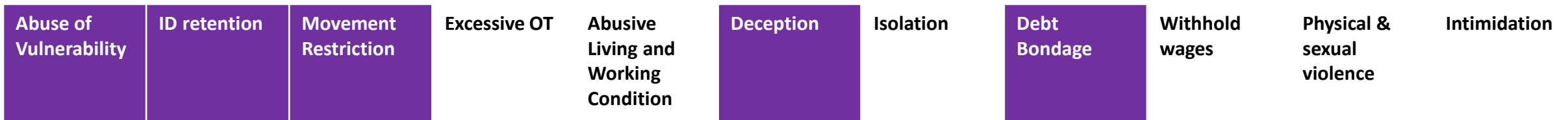
### Key Activities

- ❖ **Recruitment Fees** related Process and Procedures for active & inactive workers from 1 November 2018
- ❖ New Recruitment Process and **Procedure-Ethical Recruitment**
- ❖ **Passport Retention Management- Lockers and related SOP**

## Workstream Outcome

<b>OP1</b>	Historical recruitment fees repaid for current and former workers
<b>OP2</b>	Recruitment policies, processes and practices have effective due diligence systems in place to ensure ethical recruitment
<b>OP3</b>	100% level of understanding of repayments by current and former workers
<b>OP4</b>	All workers are in possession of their own personal documents and have individual, secure lockers within their own accommodation to store them

[Link to 11 ILO Indicators of Forced Labour](#)



# REMEDIATION FEE



7 March 2022


## Reaching Out to Former Workers for Remediation

Sime Darby Plantation Berhad (SDP) is the world's largest producer of certified sustainable palm oil. We are committed to responsible recruitment to ensure that our workers are free from forced labour and exploitative practices.

In July 2021, SDP became aware that some of our foreign workers may have been charged additional fees by third-party recruitment agents. Such fees are unreported payments charged by agents, sub-agents or other third parties to our foreign workers in their countries of origin, in contravention of SDP's zero recruitment fee policy.

As part of our ongoing remediation programme, SDP will be reimbursing our eligible foreign workers who used to work for us with a one-off lump sum payment (the Remediation Payment).

We invite all SDP former workers who left the company on or after 1 November 2018 to contact our appointed lawyers as per the following contact details, within 2 months from the date of this advertisement in order to be considered for the Remediation Payment. Our appointed lawyers will provide further information to prospective claimants on how they may make a claim for the Remediation Payment.

 <b>Sime Darby Plantation Berhad</b> Migrant Worker Recruitment Procedure	<b>2021</b>
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**Sime Darby Plantation Berhad**

Migrant Worker Responsible Recruitment Procedure



**Bangladesh**

Hotline Number: +880 1952055944  
Email Address: jabin.mahmood@dfd.com



**Indonesia**

Hotline Number: +62 2150111200  
Email Address: sdp.help@lawghp.com



**India**

Hotline Number: +91 8800339680  
Email Address: sime@induslaw.com



**Nepal**

Hotline Number: +977 9823677584  
Email Address: sdclaim@neupaneleg.com



**Sri Lanka**

Hotline Number: +94 768041921  
Email Address: supportservices@fjgdesaram.lk



**PASSPORT LOCKER**



TUE FEB 15, 2022 / 3:57 AM EST

# Malaysia's Sime Darby Plantation to compensate migrant workers over fees



Feb 15 (Reuters) - Malaysia's Sime Darby Plantation will set aside a total of 82.02 million ringgit (\$19.60 million) to compensate current and former migrant workers who paid recruitment fees to secure jobs, the company said, amid concerns over its labour practices.

## Maybank IB: Sime Darby Plantation's recruitment fees reimbursement a step in right direction

Bernama / Bernama  
February 16, 2022 11:24 am +08



# Sime Darby to reimburse RM82mil recruitment fees to foreign workers

FMT Reporters - February 15, 2022 3:52 PM



HOME / MALAYSIA

## Sime Darby Plantation to reimburse foreign workers from eight countries RM82m in recruitment fees

Tuesday, 15 Feb 2022 03:09 PM MYT



- JUST IN POPULAR
- 7 minutes ago: Ampang landslide: 5 houses to be vacate MB
- 12 minutes ago: Transport Ministry: apply for air VTL tra Cambodia, Singapo
- 24 minutes ago: Deputy minister say March 23 court deci

# Continuous Improvement

## Workstream 6 : Wages

### Key Activities

- ❖ **Independent auditor review** on payment of wages and other payments
- ❖ **Review and improvements on work-related conditions** such as working hours, work on rest days – e.g. OT capped at 4 hours a day; No working more than 14 consecutive days
- ❖ **Review and improvements on wage structure and payslip**
- ❖ **Automation of processes to accurately capture workers clock-in time**

[Link to 11 ILO Indicators of Forced Labour](#)

Abuse of  
Vulnerability

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**Excessive OT**

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**Withhold  
wages**


Physical &  
sexual  
violence

Intimidation


## Workstream Outcome

- |            |  |
|------------|--|
| <b>OP1</b> | Simplified and consistently applied wage structure                     |
| <b>OP2</b> | Workers and management understand payslip and how wages are paid       |
| <b>OP3</b> | Governance on wages, work hours / days and equitable pay for work done |
| <b>OP4</b> | Authorised and fair wage deductions                                    |





## English




### UNDERSTANDING YOUR WAGES


#### SCENARIO #1

**How to achieve minimum wage for daily rated workers**


**1** Siti works as an office cleaner




**2** Siti earns RM46.15 a day




**3** Siti was offered 24 days of work for the month and had no absent days. She also completed all her daily tasks



**4** Siti's salary for the month will be 24 days x RM46.15 = RM1,107.60



**5** Siti earned the minimum wage for daily rated workers.





## Hindi



### अपने वेतन को समझिए

#### परदृश्य #2

**आप दैनिक रेटेड कार्यकर्ता के लिये अपना पूरा वेतन क्यों नहीं कमा सकते हैं**

**1** अर्चू स्टोर कीपर के रूप में काम करता है।



**2** अर्चू एक दिन में RM46.15 अर्जित करता है।



**3** अर्चू को 24 दिनों के लिये काम की योजना की गई थी परन्तु उसने केवल 20 दिनों के लिये काम किया। वह, बासि कारण के 4 दिनों मीहाराजि रहा।



**4** इसलिये अर्चू का जाली वा वेतन 20 दिन x RM46.15 = RM923.00



**5** अर्चू ने अपने मीहाराजि के दिनों के कारण अपना पूरा वेतन अर्जित नहीं किया।





## Bengali



### আপনার পারিশ্রমিক অবগত

#### দৃশ্যপট #3

**কীভাবে টপ-আপ সিস্টেমে কার্যকর হয়**

**1** কুমার মাসের 24 দিন কাজ করে এবং পুরোদিনে RM46.15 উপার্জন করে।



**2** কুমারের মাসের 24 দিন কাজ করা হয়েছে তাই প্রত্যেক দিনে এক বা দুই ডলার (সি) অতিরিক্ত উপার্জন করা সহজ হবে।



**3** কুমার মাসের 24 দিনে 4 দিন সাঁজা কাজ করে পারেন।



**4** যদি কুমারের পুরোদিনের 4 দিনে টপ-আপ করে, তা হলে 4 দিন x RM46.15 = RM184.60



**5** সুতরাং কুমারের মাসের পারিশ্রমিক হবে: 20 দিন x RM46.15 = RM923.00



**6** টপ-আপ সিস্টেমে কুমার মাসের 24 দিনে অর্জিত মুদ্রার পারিশ্রমিক উপার্জন করবে।



RM923.00 + RM184.60 (টপ-আপ) = **RM1,107.60**



## Indonesia



### MEMAHAMI UPAH ANDA

#### SKENARIO #4

**Bagaimana upah potongan dihitung**

**1** Wirando bekerja sebagai penyemprot dan upah potongannya adalah RM9.23/ hektar (ha) tanah yang disemprot



**2** Wirando ditawarkan 24 hari kerja dan harus menyelesaikan 5 hektar (ha) tanah yang disemprot setiap hari



**3** Wirando bekerja sepanjang 24 hari yang ditawarkan dan menyelesaikan lebih dari apa yang perlu dia lakukan




**4** Wirando menyelesaikan 7 hektar (ha) tanah yang disemprot selama 24 hari dia bekerja.



Gaji Wirando bulan ini adalah: 24 hari x 7 ha x RM9.23 = **RM1,550.64**

\*Kadar potongan mungkin diwaspada dari ladang ke ladang dan mungkin berubah dari waktu ke waktu.



### உங்கள் சம்பளச்சீட்டு

**பாகம் II - நீங்கள் ஈட்டிய சம்பளம் மற்றும் பிடித்தங்கள்**

**மொத்த வருமானம்**

CODE	DESCRIPTION	AMOUNT (RM)
E001	PIECE RATED WAGES (12.00 DAYS)	781.58
E001	DAILY RATED WAGES (9.00 DAYS)	380.79
E001	HARVESTING WAGES (2.00 DAYS)	39.86
E004	PRICE BONUS - NORMAL DAY	113.40
F004	PRODUCTIVITY INCENTIVE	3.27
F005	ATTENDANCE/ OVERTURN INCENTIVE	25.99
A177	SPECIAL GRATUITOUS PAYMENT (NORMAL DAY)	107.66
E007	OVERTIME - NORMAL DAY	300.75
E002	REST DAY WAGES	380.88
E005	PRICE BONUS - REST DAY	16.20
E008	OVERTIME - REST DAY	110.62
A178	SPECIAL GRATUITOUS PAYMENT (REST DAY/ PH)	15.38
F001	PAID PUBLIC HOLIDAY	110.62
A038	PHONE REIMBURSEMENT (FOREIGN WORKERS)	5.00
<b>TOTAL INCOME</b>		<b>2391.00</b>

**மொத்தப் பிடித்தங்கள்**


CODE	DESCRIPTION	AMOUNT (RM)
D002	EMPLOYEE EPF	0.00
D003	EMPLOYEE SOCSO	0.00
O117	EMPLOYEE SOCSO (SIP)	0.00
D027	UNION - NUPW MEMBERSHIP FEE	11.00
D066	EXCESS OF WATER SUBSIDY (WORKER)	6.73
<b>TOTAL DEDUCTION</b>		<b>17.73</b>

**NET PAY** 2273.27

மாதந்தான் தொழில் ஈட்டிய மொத்த சம்பளம்

மாதந்தான் தொழில் உட்கட்ட வேண்டிய மொத்த தொகை

இந்த மாதந்தான் மொத்தப் பிடித்தங்கள்



### আপনার পেঙ্গিন

**পার্ট III : আপনার কাজ এবং উপস্থিতির বিবরণ**

AVERAGE DAILY WAGE	61.04
AVERAGE DAILY WAGE (CURRENT MONTH)	61.04
AVERAGE DAILY WAGE (LAST MONTH)	59.50
PRODUCTIVITY/OVERTURN INCENTIVE PER DAY	1.54

গড় দৈনিক মজুরি মানে একদিনের মজুরি। এটি বিশ্রামের দিন / সরকারী ছুটির দিন এবং ওভারটাইমের কাজের হিসাবে ব্যবহৃত হয়

আইন দ্বারা প্রদত্ত হারের উপর ভিত্তি করে ওভারটাইম গণনা করা হয়

#### মাসের জন্য কাজ এবং উপস্থিতির বিবরণ

1 NORMAL DAY WORK 23.00	5 OT - NORMAL 0.00	9 PAID HOLIDAY 2.00	13 APPROVED UNPAID LEAVE 0.00	16 SOCSO LEAVE 0.00
2 RESTDAY WORK 3.00	6 OT-RESTDAY 0.00	10 ANNUAL LEAVE 0.00	14 ABSENT 1.00	17 OTHER LEAVE 0.00
3 WORK ON HOLIDAY 0.00	7 OT-HOLIDAY 0.00	11 SICK LEAVE 0.00	15 MATERNITY 0.00	18 REST DAY 2.00
4 NO WORK 0.00	8 HALF DAY 0.00	12 NON PERFORMANCE/ NON COMPLETION		

১ স্বাভাবিক সংখ্যা কর্ম দিবস

২ বিশ্রামের সংখ্যা কর্ম দিবস

৩ জন্ম সংখ্যা ছুটির দিনে কাজে

৪ দুর্বল আবহাওয়া / MCO এর কারণে দৈনিক কর্ম বিয়

৫ ওভারটাইম ঘণ্টা চালা সাধারণ দিন

৬ ওভারটাইম ঘণ্টা চালা বিশ্রাম দিন

৭ ওভারটাইম ঘণ্টা চালা সরকারী ছুটি

৮ অর্ধদিবস কর্মীরা কত দিন কাজ করেছে

৯ প্রদত্ত সংখ্যা সরকারী ছুটি

১০ বার্ষিক সংখ্যা ছুটি নেওয়া

১১ অসুস্থজনিত দিনের সংখ্যা ছুটি নেওয়া

১২ অ-পারফরম্যান্স / সমাপ্তির দিনের সংখ্যা কাজ এর

১৩ অনুমোদিত অবৈতনিক ছুটির দিনের সংখ্যা

১৪ ছুটি বাতিরেকে অনুপস্থিত কর্মীর সংখ্যা

১৫ দিনের সংখ্যা মাতৃস্বকালীন ছুটি

১৬ socso জনিত ছুটির সংখ্যা (যেমন, দুর্ঘটনার ক্ষেত্রে)

১৭ অন্যান্য ছুটির সংখ্যা যেমন সহানুভূতিশীল, তীর্থ বা হজ্জ যাত্রা

১৮ বিশ্রাম দিবসের সংখ্যা

WAGE CODES TRANSLATED



# Sustaining the Changes

## Workstream 7 : KPI



**From:** Sustainability Health Index (SHI)

**To:** ESG scorecard and accountability mapping

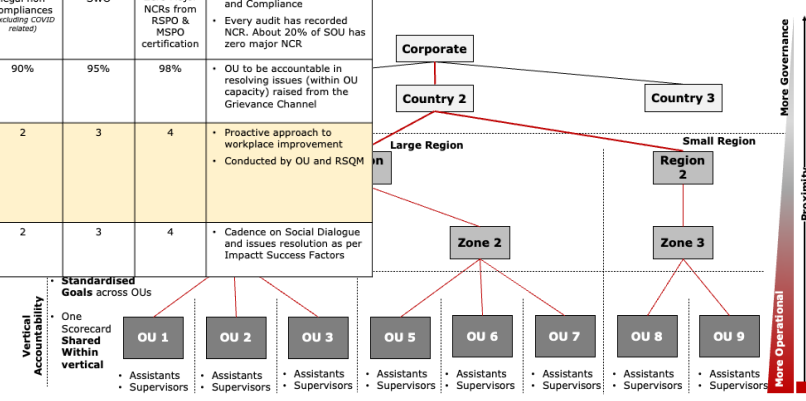
1. Within Performance Management (5% weightage)
2. Evaluated by self and managers
3. Individual Performance
4. Focuses on HSE, Governance and Environment

1. Outside of performance management (heavier emphasis)
2. Centrally managed & metric driven
3. Collective performance
4. Focuses expanded to resolving and maintaining improvement based on ILO Indicators

Sustainability Health Index	Parameter	Weight (%)	Level	1	2	3	4	5
<b>5% of Total KPI</b>								
<b>HSE (50%)</b>	LTI reduction	20	RGM (5%) RCE (5%) Managers (5%) Executives (10%)	Accidents increased	Similar to last FY	Y% reduction or better	X% reduction or better	Zero LTI
	Inspections (Workplace & House)	30	RGM (5%) RCE (5%) Managers (5%) Executives (10%)	< Once / Quarter	Once / Quarter	Once per month	Once per 2 weeks	Once per week
<b>Governance (50%)</b>	Compliance / Conformance to legal & internal policies & procedures	50	RGM (5%) RCE (5%) Managers (5%) Executives (10%)	Issued with SWO	More than 1 penalty, fine, compound or Notices / Multiple major NCR	Not more than 1 penalty, fine, compound, SWO or Notices	Zero penalty, fine, compound, SWO or notices & Major NCR	Zero penalty, fine, compound, SWO, Notices & NCR
<b>Environment</b>	Waste Generation	NA	Group Sustainability and OUs	Proposed to be excluded from SHI Index weight – but maintain for reporting and tracking purposes				
	Water Consumption (m3)	NA						
	Energy Intensity (GJ/mt)	NA						

Workstream	Propose KPI	Propose Measures	%	Threshold	Base	Stretch	Rationale
<b>ALL</b>	<b>1. Workers Satisfaction Survey</b>	Overall Survey Scores (First year survey is set as baseline)	20%	2	3	4	• Quarterly evaluation on WS Initiatives and 11 ILO Indicators
<b>ALL</b>	<b>2. Environmental &amp; Governance Compliance</b>	Compliance to Legal and statutory requirements + Conformance to Sustainability Certifications	20%	Penalty/Fine/Summon /SWO due to legal non-compliances (excluding COVID related)	Zero Fines/ Penalty/ Summon/ SWO	Base + Zero Major NCRs from RSPD & MSPD certification	• KPI adopted from SHI • Yearly OU-level audit conducted on Environmental and Compliance • Every audit has recorded NCR. About 20% of SOU has zero major NCR
<b>1: Grievance Channel</b>	<b>3. Closure of Grievances</b>	Improve oversight of Grievances and accountability for grievance handling: • % of Grievance Closure	20%	90%	95%	98%	• OU to be accountable in resolving issues (within OU capacity) raised from the Grievance Channel
<b>2: OSH</b>	<b>4. OSH Index</b>	Assessment of OSH practices: • Quality of HIRARC intervention • Quality of workplace inspection • Incidents Reporting (including near misses)	20%	2	3	4	• Proactive approach to workplace improvement • Conducted by OU and RSQM
<b>3: Social Dialogue</b>	<b>5. Effectiveness of Social Dialogue</b>	Impact's SD Success Factors (Issues Resolution Timeline, Workers representation & SD Continuation)	20%	2	3	4	• Cadence on Social Dialogue and issues resolution as per Impact Success Factors

green status at different levels



# Sharing Our Story.....

Estates and mills in both  
Peninsula Malaysia and East  
Malaysia covering  
approximately  
**342,000 hectares**



This translates to **4 times**  
the size of  
**Singapore,**  
spanning many remote  
locations

**1 year** of  
**>500,000 man hours**  
comprising  
**>1,200 individuals**

involving  
**>10,000 meetings**

**150 operating units**  
spanning a distance of up  
to **4,100 km** from the  
Head Office in  
Kuala Lumpur

**24,000 workers**  
focused in our plantation  
operations, **15,000** of  
whom are **migrant**  
**workers** from  
**9 countries**

**Lock downs**

Processes and  
actions conducted  
**virtually**

# Q&A

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# THANK YOU

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