

**RSPO PRINCIPLE AND CRITERIA  
1<sup>st</sup> Annual Surveillance Assessment (ASA1)  
Public Summary Report**

<b>Genting Plantations Berhad</b>
Head Office: 10 <sup>th</sup> Floor, Wisma Genting Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
<b>Genting Sabapalm Oil Mill and supply base</b> KM 25, Down Sg. Labuk, Mukim Tagas-Tagas 90000 Beluran, Sandakan Sabah, Malaysia

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0086-06-000-00	<b>Date</b>	Member since: 14 November 2006
<b>Company Name</b>	Genting Plantations Berhad		
<b>Address</b>	Head office : 10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia Certification unit : Genting Sabapalm Oil Mill, KM 25, Down Sg. Labuk, Mukim Tagas-Tagas 90000 Beluran, Sandakan, Sabah, Malaysia		
<b>Subsidiary of (if applicable)</b>	Not applicable		
<b>Contact Name</b>	Mr Tan Cheng Huat (Senior Vice President – Plantation Division)		
<b>Website</b>	<a href="http://www.gentingplantations.com/">http://www.gentingplantations.com/</a>	<b>E-mail</b>	<a href="mailto:chenghuat.tan@genting.com">chenghuat.tan@genting.com</a>
<b>Telephone</b>	+603 23336510	<b>Facsimile</b>	-

2. Certification Information			
<b>Certificate Number</b>	RSPO 653477	<b>Certificate Issued Date</b>	09/06/2016
		<b>Expiry Date</b>	08/06/2021
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production from Genting Sabapalm Oil Mill and Supply Base (Genting Sabapalm Estate)		
Other Certifications			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
CoP/MF/0024-1	Code of Good Milling Practice for Palm Oil Mills	MPOB	17/12/2017
50450206 MSPO	Malaysian Sustainable Palm Oil	DQS	03/07/2019
AR 5768 – ISO 9001 : 2008	QMS	SIRIM QAS International Sdn Bhd	14/09/2018
ER 0741 – ISO 14001 : 2004	EMS		24/02/2017
SR 0590 – OHSAS 18001 : 2007	OHSAS		24/02/2017
EU-ISCC-Cert-DE119-60173799	ISCC EU	ASG Cert GmbH	12/01/2018
ISCC-PLUS-Cert-60173799	ISCC PLUS	ASG Cert GmbH	12/1/2018

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3. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS	
		Easting	Northing
Genting Sabapalm Palm Oil Mill (20 mt/hr)	Beluran, Sabah, Malaysia	117° 22' 26.8"	5° 57' 54.3"
Genting Sabapalm Estate	Beluran, Sabah, Malaysia	117° 22' 26.8"	5° 57' 54.3"

4. Description of Supply Base							
Estate	Mature (ha)	Immature (ha)	Total Planted (ha)	HCV (ha)	Infras & Other (ha)	Total Hectarage	% of Planted
Genting Sabapalm Estate	3,636.72	271.48	3,908.20	8.95	441.43	4,358.58	89%

5. Plantings & Cycle								
Estate	Age (Years)					Tonnage / Year		
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Actual* (Jan 15-Dec 15)	Actual (Jan 16-Dec 16)	Forecast (Jan 17-Dec 17)
Genting Sabapalm Estate	271.48	1,017.52	1,783.48	581.78	253.94	88,879.40	84,987.30	93,000.00

\*Actual production use for Jan-Dec 2015 to reflect the production of the mill. Previous CB final report forecast for year 2015 has a major gap in the reporting period.

\*\* The planting age 0-10 is replanting activities.

6. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Actual (Jan 15-Dec 15)	Actual (Jan 16-Dec 16)	Forecast (Jan 17- Dec 17)
Genting Sabapalm Estate	88,879.40	84,987.30	93,000.00

7. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)			
Independent FFB Supplier	Tonnage / year		
	Actual (Jan 15-Dec 15)	Actual (Jan 16-Dec 16)	Forecast (Jan 17- Dec 17)
Smallholders	24,187.00	29,241.00	N.A

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<b>8. Certified Tonnage</b>									
<b>Mill</b>	<b>Actual* (Jan 15-Dec 15)</b>			<b>Actual (Jan 16-Dec 16)</b>			<b>Forecast (Jan 17- Dec 17)</b>		
	<b>FFB</b>	<b>CPO</b>	<b>PK</b>	<b>FFB</b>	<b>CPO</b>	<b>PK</b>	<b>FFB</b>	<b>CPO</b>	<b>PK</b>
Genting Sabapalm Oil Mill	88,879.40	19,571.73	3,781.62	84,987.30	18,520.40	3,572.62	93,000.00	20,608.10	3,896.70
% of OER & KER		22.02	4.25		21.80	4.21		22.16	4.19

## Section 2: Assessment Process

### Certification Body:

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

### Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 11 & 12 April 2017 and the on-site closure of Major Non-conformity was conducted on 23 May 2017. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estate (Genting Sabapalm Estate). A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

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

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

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

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

The previous nonconformity is remains closed. The assessment findings for the 1<sup>st</sup> Annual Surveillance Assessment are detailed in Section 3.3.

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

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

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

<b>1. Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Initial Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA4)</b>
Genting Sabapalm Oil Mill	√	√	√	√	√
Genting Sabapalm Estate	√	√	√	√	√

[Click here to enter a date.](#)

**Tentative Date of Next Visit:** April 11, 2018 – April 12, 2018

**Total No. of Mandays:** 6 mandays

**BSI Assessment Team:**

**Hoo Boon Han – Lead Auditor**

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

**RSPO Public Summary Report  
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He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers and stakeholders consultation.

**Mohd Hafiz Bin Mat Hussain – Team Member**

He holds Bachelor Degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2014 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since May 2013 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation.

**Accompanying Persons: -**



## Section 3: Assessment Findings

### 3.1 Details of audit results

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

- Genting Plantations Berhad Time Bound Plan
- RSPO P&C MY-NIWG 2014 Checklist
- RSPO Supply Chain Certification Checklist November 2014

### 3.2 Progress against Time Bound Plan

Genting Plantations Berhad is a member of RSPO since 14 November 2006; the membership number with RSPO is 1-0086-06-000-00.

Genting Plantations Berhad\* ("Genting Plantations"), a 54.7%-owned subsidiary of Genting Group, is one of the fastest-growing plantation companies listed on the Main Board of Bursa Malaysia.

Genting Plantations currently has 131,159\* hectares of planted areas in Malaysia and Indonesia. Since its inception, Genting Plantations has established itself as a reputable and reliable palm oil producer as well as one of the lowest-cost palm oil producers in Malaysia.\* Formerly known as Asiatic Development Berhad.

\*Note: 131,159 ha is company planted areas, Plasma is 10,027 ha. Total planted areas: 141,186 ha

Genting Plantations Berhad has developed a time-bound plan (Appendix C) for the phased implementation of the RSPO standards at their oil mills and estates.

The BSI assessment team considers that Genting Plantations Berhad is on the right track which is reasonable and challenging, given the widespread geographic locations of its properties, the resources required and the numbers of smallholders involved.

\*Genting Plantations Berhad Annual Report 2016

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<b>Time Bound Plan</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
<b>Summary of the Time Bound Plan</b>		
Does the plan include all subsidiaries, estates and mills?	The time bound plan includes all operating units in Malaysia and Indonesia.	Yes
Is the time bound plan challenging? <ul style="list-style-type: none"> <li>• Age of plantations.</li> <li>• Location.</li> <li>• POM development</li> <li>• Infrastructure.</li> <li>• Compliance with applicable law.</li> </ul>	The TBP is challenging especially for operating units in Indonesia. The current focus of the Indonesian management is to implement ISPO which is a mandatory requirement. Infrastructure and POM construction is still on-going. The company is also expanding the land areas with new acquisitions.	Yes
Have there been any changes since the last audit? Are they justified?	The changes are due to new acquisitions and rescheduling by the management.	Yes
If there have been changes, what circumstances have occurred?	Delays in certification of some POMs and estates.	Yes
Have there been any stakeholder comments?	To-date, no comments received from stakeholders on the TBP.	Yes
Have there been any newly acquired subsidiaries?	Yes. PT AAC and PT PALJ in Kalimantan, Indonesia.	Yes
Have there been any isolated lapses in implementation of the plan?	No lapses however re-scheduling of the certification dates has been made.	Yes
<b>Un-Certified Units or Holdings</b>		<b>Un-Certified Units or Holdings</b>
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Yes	Yes
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area identified as containing High Conservation Values (HCVs).</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3.</li> </ul>	HCV Assessments and SEIA have been conducted for all operating units including newly acquired areas. HCV and SEIA management and monitoring plans are also implemented in accordance with the consultant's recommendations.	Yes
Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	NPPs have been submitted for new plantings since Jan 2010. The latest NPP was published on RSPO website on 13 July 2016 for Genting Jambongan Estate in Sabah for an expansion of the estate areas.  We shall provide updates if required later.	Yes
Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria	No. The above NCR land conflict for Tongod (Genting Tanjung Bahagia S/B) was resolved via High Court led mediation in March 2016.	Yes

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6.4, 7.5 and 7.6.		
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	To-date, no complaints on labour disputes received by the company.	Yes
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Yes	Yes
Any Legal non- compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	None so far. No stakeholder comments or complaints received.	Yes

**3.3 Details of findings**

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

During the 1<sup>st</sup> Annual Surveillance Assessment there were three (3) Major and three (3) Minor nonconformities raised. The Genting Sabapalm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted. All the major CAP has been verified during site visit on 23 May 2017.

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

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1463422-201704-M1	<b>Requirements</b> <b>Indicator 6.1.3</b> Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.	Major
	<b>Evidence of Nonconformity</b> Social Management and Monitoring Plan which updated on 1/4/2017 has not incorporated the issues or impact identified from the consultation with the affected stakeholders. The existing plan only recorded plan such as updating list of stakeholder, organize stakeholder meeting and etc.	
	<b>Statement of Nonconformity</b> Social management plan is not develop comprehensively.	
	<b>Corrective Actions</b> The system information has been updated accordingly on the 17/04/2017. Estate person in-charge will be given more guidance and clear exposure on the social management plan (SMP) procedure and new format implementation.	

	<p>The dateline for updating the Social Management and Monitoring Plan will be on 17/04/2017. Monitoring will be done by the Estate Sustainability Coordinator.</p>	
	<p><b>Assessment Conclusion</b>            The CAP and evidence has been submitted and an on-site visit was carried out on 23/5/2017 for major closure. Evidence submitted verified and on-site verification updates :</p> <ul style="list-style-type: none"> <li>a. The social management plan has incorporated various social activities such as internal &amp; external stakeholder meeting, complaints, worker committee and etc.</li> <li>b. Comment, action to be taken and status in the plan showing the latest progress the issue and how it being monitored</li> <li>c. Verified the action taken in the plan through interviewed the workers and village;</li> </ul> <p>It has confirmed that the issue has been fully addressed hence the Major NC was closed on 23/5/2017.</p>	

<b>Non-Conformity</b>		
<b>NCR #</b>	<b>Description</b>	<b>Category (Major / Minor)</b>
<p>1463422-201704-M2</p>	<p><b>Requirements</b>  <b>Indicator 6.5.2</b>            Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p><b>Evidence of Nonconformity</b>            In GSPE, the extension contract stated that all the terms were according to the initial contract of employment signed. However the initial contract already obsolete due to the establishment of new contract template (rev: 2; date 01/08/2016). The new contract has different terms such as minimum wages. All existing workers in estate did not sign the new contract even though a training has been conducted to explain on the new contract terms and conditions on 29 March 2017.</p> <p><b>Statement of Nonconformity</b>            Workers' contract is not managed effectively</p> <p><b>Corrective Actions</b>            Any new updates on workers contract agreement have to be made to all existing workers contract agreement, and they have to acknowledge and re-signed the document. Corrective action have been made immediately on the 17<sup>th</sup> April 2017. Workers recruited before 1st August 2016, have acknowledged on the new additional and amendment made on the workers contract agreement, and have initial on the document.</p> <p><b>Assessment Conclusion</b>            The CAP and evidence has been submitted and an on-site visit was carried out on 23/5/2017 for major closure. Evidence submitted verified and on-site verification updates :</p>	<p>Major</p>

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	<p>a. All the workers' contract have updated to version rev: 2; date 01/08/2016; b. Interviewed the workers and they aware of the changes of the new contract.</p> <p>It has confirmed that the issue has been fully addressed hence the Major NC was closed on 23/5/2017.</p>	
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<b>Non-Conformity</b>		
<b>NCR #</b>	<b>Description</b>	<b>Category (Major / Minor)</b>
1463422-201704-M3	<p><b>Requirements</b> <b>Indicator 6.10.2</b> Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation).</p> <p><b>Evidence of Nonconformity</b> There is no evidence that the mill have explained FFB pricing, and pricing mechanisms for FFB and inputs/services. Only new FFB supplier questionnaire (PM-MKT-04-F01-0) use for smallholder during application.</p> <p><b>Statement of Nonconformity</b> No documented evidence that millers have explained FFB pricing, and pricing mechanisms to the smallholders.</p> <p><b>Corrective Actions</b> 1) To prepare the External FFB Procurement/Pricing Policy Agreement for SVP-Marketing approval. 2) To conduct FFB Supplier/stakeholder meeting to explain the pricing mechanism. 3) Any new FFB supplier will be brief the pricing mechanism and get their acknowledgement in the agreement.</p> <p><b>Assessment Conclusion</b> The CAP and evidence has been submitted and an on-site visit was carried out on 23/5/2017 for major closure. Evidence submitted verified and on-site verification updates : a. External Fresh Fruit Bunch (FFB) Procurement Policy Agreement incorporating the pricing mechanism has been documented for the smallholders. b. The supplier/stakeholder meeting to explain the pricing mechanism conducted on 11 May 2017. Attendance and meeting sighted during site visit. c. Interviewed the smallhodler and they aware of the pricing mechanism; they also signed the agreement for the pricing mechanism.</p> <p>The CAP would be considered as the ongoing plan and the effective will be verified in its next surveillance audit. It has confirmed that the issue has been fully addressed hence the Major NC was closed on 23/5/2017.</p>	Major

<b>Non-Conformity</b>		
<b>NCR #</b>	<b>Description</b>	<b>Category</b>

		<b>(Major / Minor)</b>
1463422-201704-N1	<b>Requirements</b> <b>Indicator 6.2.3</b> A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.	Minor
	<b>Evidence of Nonconformity</b> Stakeholder meeting minutes which recorded all the issues raised up by stakeholders, action and person in charge. However, no records of actions taken in response to input from stakeholders For example, <ul style="list-style-type: none"> <li>a. Internal stakeholder meeting dated 16 March 2017- Repairing of drain in the canteen; fencing of the sundry shop for safety purpose</li> <li>b. External stakeholder meeting dated 11 March 2017- Instruction from mill to smallholder for using net during transportation of FFB.</li> </ul>	
	<b>Statement of Nonconformity</b> No records of actions taken in response to input from stakeholders	
	<b>Corrective Actions</b> <ul style="list-style-type: none"> <li>a) The system information has been updated accordingly on the 17/04/2017. Estate person in-charge will be given more guidance and clear exposure on the social management plan (SMP) procedure and new format implementation.</li> <li>b) To define the issue properly with the attachment of evidence.</li> <li>c) The proper action for social management plan was updated on 17 April 2017</li> <li>d) To incorporate the new format in the upcoming stakeholder meeting minutes.</li> </ul>	
	<b>Assessment Conclusion</b> The CAP has been submitted on 23/5/2017. Effectiveness of corrective action taken will be verified in the next audit.	

<b>Non-Conformity</b>		
<b>NCR #</b>	<b>Description</b>	<b>Category (Major / Minor)</b>
1463422-201704-N2	<b>Requirements</b> <b>Indicator 4.7.3</b> All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.	Minor
	<b>Evidence of Nonconformity</b> <ul style="list-style-type: none"> <li>a. During site visit at FFB grading area (GSOM), found that: FFB graders were not wearing appropriate safety helmet</li> <li>b. FFB helper from GSPE (E10826) was not wearing appropriate safety shoes</li> <li>c. Safety shoes that used by FFB graders (E00249 and E00254) were not in good condition.</li> </ul>	
	<b>Statement of Nonconformity</b> Adequate and appropriate protective equipment was not made available to the workers at workplace to cover all potential hazardous operations.	

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	<p><b>Corrective Actions</b></p> <ul style="list-style-type: none"> <li>a) Existing SOP mention that the grader should wear safety helmet and we amend on the SOP for the Grader wear the suitable cap.</li> <li>b) Safety boots was purchased and given to the ramp FFB grader on the 16th April 2017</li> <li>c) To follow up with supplier on the delivery of the safety shoes</li> <li>d) To retrain the graders according the new SOP of the wearing suitable cap when grading in progress.</li> <li>e) All ramp FFB grader to be given proper PPE before working on the mill FFB ramp.</li> <li>f) To re-evaluate the service of the supplier.</li> </ul>	
	<p><b>Assessment Conclusion</b></p> <p>The CAP has been submitted on 23/5/2017. Effectiveness of corrective action taken will be verified in the next audit.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1463422-201704-N3	<p><b>Requirements</b> <b>Indicator 4.7.5</b> Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p><b>Evidence of Nonconformity</b> First aid box provided at harvesting area and was inspected by HA on Nov 2016. However, the expired items (expired in July 2016 and Dec 2016) were still kept inside the first aid box no. 19.</p> <p><b>Statement of Nonconformity</b> The first aid items expiring date were not monitored effectively.</p> <p><b>Corrective Actions</b> The first aid box was immediately updated on the 11th April 2017. Estate health assistant to send alert to Assistant Manager &amp; Field Supervisor when a first aid box failed to send back to the clinic every month for inspection.</p> <p><b>Assessment Conclusion</b> The CAP has been submitted on 23/5/2017. Effectiveness of corrective action taken will be verified in the next audit.</p>	Minor

Observation	
OBS #	Description
	Nil

Positive Findings	
PF #	Description

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1	All operating units has maintained good relationship with the local community and other stakeholders. Positive feedback was given to the audit team during interview.
2	Good relationship being well maintained with the smallholder surrounding the mill and estate.

<b>Issues raised by Stakeholders</b>	
<p>Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Genting Sabapalm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.</p> <p>Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. These have been incorporated into the assessment findings.</p> <p>Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix E.</p>	
IS #	Description
1	<p><b>Issues:</b> Manurers – They explained that they were provided with new housing, however they want the estate management provide the electricity from 6pm-6am every day.</p> <p><b>Management Responses:</b> The estate management already applying government electricity (SESB), the process is still in progress.</p> <p><b>Audit Team Findings:</b> No further issue.</p>
2	<p><b>Issues:</b> Humana School- A lot of children joining the school but limited space. However, it still manageable at this moment. The management is very responsive if there any complaints for repairing and so on.</p> <p><b>Management Responses:</b> The management will continue contribute in supporting the Humana school. At the same time, the management also looking into the budget to building a larger school.</p> <p><b>Audit Team Findings:</b> No further comments.</p>
3	<p><b>Issues:</b> Agensi Pekerjaan MNK- All the workers being hired through the proper and legal channel. They will have the agent in the respective country to ensure there is no cases like contract substitution. Contracts of workers being keep and a copy also available with the employer.</p> <p><b>Management Responses:</b> The management will continue ensure their recruitment always comply with the legal requirements.</p> <p><b>Audit Team Findings:</b> No further comments.</p>
4	<p><b>Issues:</b> Crèche- the parents will send their children to here around 6.30 am with pack lunch. Whenever the children get sick, they will inform the parents and send them to the clinic.</p> <p><b>Management Responses:</b></p>



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	The management will continue to support whenever they request for assistance.
	<b>Audit Team Findings:</b> No further comment.
5	<b>Issues:</b> Clinic- Estate clinic providing health care treatment for nearby villagers & stakeholders. Site inspection for the line site conducted on weekly basics.
	<b>Management Responses:</b> The management will continue to give co-operation to the MA to conduct his duties.
	<b>Audit Team Findings:</b> VMO visit records and disposal of clinical wastes records were verified.

**3.3.1 Status of Nonconformities Previously Identified and Observations (from previous CB)**

Non-Conformity		
NCR #	Description	Category (Major / Minor)
Minor 1	<p><b>Requirements</b> <b>Indicator 6.5.3</b> Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. Improvement required at some wooden housing quarters.</p> <p><b>Evidence of Nonconformity</b> Concrete and wooden houses were available in the workers quarters line site. Other facilities and amenities provided include: 24 hours free water and electricity supply from Mill. Surau, Chapel, Chinese Temple, Community hall, volleyball court, club house, football fields, school, tabika/kindergarten., clinic, sundry shop, canteen and crèche. Beside, boats for transport workers and van for transporting student to nearby school (SMK Pamol). However, housing inspection by audit team found that at : a. Wooden housing quarter: In Sabapalm Estate, the plans to replace the wooden houses at Kg. Bulan which require major repair are still pending for approval  b. Concrete linesite: Rain water collected is mix with the domestic supply from mill in the same water storage tank and used as drinking water. Rain water is not treated and not tested on the suitability for consumption purposes.  c. Safety to children Although the designated parking bay available at Kg. Lumantik , heavy machinery (e.g. tractor, lorry, backhoe) was seen parking at the line-site area during the inspection as it posed a safety risk to children  d. Crèche: The crèche is clean and well managed. However, lots of flies seen at the crèche during inspection. Same concern has been raised during JKPP meeting on 26 June 2015 and minuted in the JKPP meeting.</p> <p><b>Statement of Nonconformity</b> Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. Improvement required at some wooden housing quarters.</p> <p><b>Corrective Action:</b> During site visit of ASA1:  a. In total 94 wooden houses surround the mill and estates. During inspection of the site, total of 12 new houses are built and residents of the wooden</p>	Minor

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	<p>houses have moving into the new house. Priority move into the new house are given to those houses which required major services.</p> <p>Another 8 houses in the progress of building under approved budget 2017. Residents are moving phase by phase and the wooden house will be demolished once all the line site is ready.</p> <p>b. Inspection to the line site and confirmed corrective action taken by separating the storage tank into rainwater and treated pipe water. In new line sites, storage water tank only cater for treated pipe water.</p> <p>c. Inspection to Kg Lumantik, a parking bay area has been designated for all the workers to park their vehicles including lorry and excavator. Briefing has been provided to the workers to park their vehicles at the designated parking bay instead at front their house.</p> <p>d. Inspection to the Crèche and found it well manage and clean without any flies. It is due to the application of EFB for plants surrounding the Crèche. Management has installed the netting and stop the application of EFB.</p>	
	<p><b>Assessment Conclusion:</b> The corrective action has been implemented effectively. Therefore, the minor non-conformance was closed on 23/05/2017.</p>	

Observation raised during Initial Assessment by other CB

Observation	
OBS #	Description
OBS 01	<p><b>Indicator 4.4.1</b> An implemented water management plan shall be in place.</p> <p><b>Objective evidence</b> The water usage from the water treatment plant at GSPE division estates ( Bangkawat and Klagan) are not being monitored or recorded.</p> <p><b>ASA1 verification</b> Water consumption monitoring was done on monthly basis. For March 2017, the domestic usage was recorded 27,361 m<sup>3</sup> (Kwan Div and Sapi Div) and 91 m<sup>3</sup> (Bangkawat Div and Klagan Div).</p>
OBS 02	<p><b>Indicator 4.5.1</b> Implementation of Integrated Pest Management (IPM) plans shall be monitored.</p> <p><b>Objective evidence</b> For rats, baits will be applied when the census records a fresh damage of 5%. Baiting will commence and rounds will be repeated after 4 days. Baiting will cease when acceptance is less than 20%. However , in Field 1 and Field 71 , although the replacement was more than &gt;20% , baiting had ceased</p> <p><b>ASA1 verification</b> The census for Rat attack was conducted on 25/2/2017. There are a few fields with fresh damage above than 5%. The rat baiting programme was started accordingly at field 58 and 59B. The census after the rat baiting on 3/4/2017 shown that the acceptance was less than 20%.</p>
OBS 03	<p><b>Indicator 4.7.3</b> All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, and harvesting.</p>

	<p><b>Objective evidence</b> In GSOM, PPE such as safety shoes are issued free to all the workers for the first PPE, but issuance onwards will charge the worker. Based on the general worker check roll monthly earning summary of July, few workers were identified that their income were deducted for shoes. Following pay slip samples taken: d. Worker Name: Sina Samaja; Station: Laboratory; Shoes Deduction: RM120; Join since: 2007 e. Worker Name: Ravi Anak Layu; Station: Shift A; Shoes Deduction: RM95; Join since: 2002 f. Worker Name: Suma Binti Ali; Station: Shift B; Shoes Deduction: RM96; Join Since: 2012</p> <p>According to the OSHA 1994 and FMA 1967, the employer shall provide approved PPE to the employee without any charges. However, a memo has been issued on 21 Aug 2015 by the Vice President- Processing (Sabah)- Vijayam a/l Manikam that PPE Provision to employee shall be no charges.</p> <p>Further verification will be done in next surveillance.</p> <p><b>ASA1 verification</b> No deduction for PPE that distribute to the workers at GSOM. Sighted payslip for all workers for the month of August 16, December 16 and February 17. It was also confirmed through interviewing the workers.</p>
OBS 04	<p><b>Indicator 4.8.2</b> Records of training for each employee shall be maintained.</p> <p><b>Objective evidence</b> On 12/9/14 training of PPE use for manurers were recorded in the training file for Muliati however it was not recorded in their individual employee file.</p> <p><b>ASA1 verification</b> All the training records were recorded and the training file for workers was available at GSOM and GSPE.</p>
OBS 05	<p><b>Indicator 6.3.1</b> The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.</p> <p><b>Objective evidence</b> However, verification checking on the grievances record book found that 2 issues raised were not fully resolved in a timely and appropriate manner as per company procedures. Example of enquiries raised: 1) Katharine Lily Jose Bouwin raised complaint dated 12 June 2015, on her house water tank's stand which will be fall down soon. Management has responded on 29th July 2015 which is after 1 &amp; ½ months later. Yet the issue have not fully resolved and the respective response from management on 29th July 2015 was agreed to repair soonest but without any time-bound stated.</p> <p>However, immediate corrective action carried out by management on the month of august 2015 and evidence document showed that the material for repair of the stand has been purchased on 19 August 2015 and repair work has started on 21st Aug 2015. 2) Katharine Lilly Jose Bouwin also requests to repair the house door on 23 July 2015 and responded by management on 29 July 2015 with statement will repair it soonest but did not clearly stated the corrective action carried out.</p> <p><b>ASA1 verification:</b> Complaint/ Grievances Book use to record all complaint from the stakeholders. The complaint form indicate the complainant details, issue, detail of action taken and also acknowledged by complainant. Verified the record book and confirmed all the complaints had been rectify with action taken. For example, an issue regarding broken ceiling has been recorded on 1 April and it was fixed on 2 April 2017.</p>

OBS 06	<p><b>Indicator 6.5.2</b> Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. Statement to ensure achieving minimum wages in the agreement was not clearly seen.</p> <p><b>Objective evidence</b> Verification audit on workers’ pay statements showed that workers are able to earn more than the minimum wages requirement of RM 800 if they committed and attend to their daily work tasks. At the meantime, workers’ wages condition statement in the contract agreement has not clearly stated to ensure compliance against the Minimum Wages Order of RM800 for Sabah. However, It did state that wages pay to workers based on agreement between employee and employer. Hence, more precise statement is required for the payment terms in the workers contract agreement.</p> <p><b>ASA1 verification</b> Employment contract are available in language that understood by workers. The contract has detailing the payments and employment conditions such as period of working, working hour, medical assistance, housing, holiday and annual leave, period of notice and etc. All the workers salary achieve minimum wages. However, a major raised due to the contract renewal issue. Please refer to Major 1463422-201704-M2.</p>
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### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
Minor 1 – 6.5.3 (previous CB)	Minor	20 Aug 2015	Closed out on 23/05/2017
1463422-201704-M1	Major	12 Apr 2017	Closed out on 23/05/2017
1463422-201704-M2	Major	12 Apr 2017	Closed out on 23/05/2017
1463422-201704-M3	Major	12 Apr 2017	Closed out on 23/05/2017
1463422-201704-N1	Minor	12 Apr 2017	“Open”
1463422-201704-N2	Minor	12 Apr 2017	“Open”
1463422-201704-N3	Minor	12 Apr 2017	“Open”

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**Assessment Conclusion and Recommendation:**

Based on the findings during the assessment Genting Sabapalm Oil Mill Certification Unit and supply base complies with the RSPO P&C 2013 (MY-NI 2014) , and the RSPO Supply Chain Certification Standard (Nov 2014) for CPO Mill. It is recommended that the certification of Genting Sabapalm Oil Mill Certification Unit is approved and continued.

<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<b>Name:</b> Mr Tan Cheng Huat	<b>Name:</b> Mr Hoo Boon Han
<b>Company name:</b> Genting Plantations Berhad Genting Sabapalm Oil Mill	<b>Company name:</b> BSI Services Malaysia Sdn Bhd
<b>Title:</b> Senior Vice President - Plantation	<b>Title:</b> <b>Lead Auditor</b>
<b>Signature:</b>  <b>Date:</b> 25 June 2017	<b>Signature:</b>  <b>Date:</b> 25 June 2017

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Commitment to Transparency</b>			
<b>Criterion 1.1:</b>			
Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.</p> <p>- Minor compliance -</p>	<p>Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making.</p> <p>Requests for information from the Regulatory Department such as DOE and DOSH during compliance visit were attended. Workers normally request for house repairing which are attended promptly. For example, latest visit notes recorded by DOSH officer dated 8 Aug 2016 is made available during onsite visit at POM.</p> <p>Besides, Genting Plantations Berhad also published annual report 2016 which incorporating upstream and downstream information.</p>	Complied
1.1.2	<p>Records of requests for information and responses shall be maintained.</p> <p>-Major compliance</p>	<p>Records of request and responses are maintained as per in the Sustainable Management Procedure Manual entitled Procedures on Requests and Responses (SMP-GPB-25) dated 14 August 2014.</p> <p>Records are held in a register (Enquiry Register Book) of all requests for information and any information required by stakeholders is made available during onsite audit in all estates and POM. In GSOM, one of the enquiry from Humana School on 28 March 2016 to use poll vehicle from the estate. To extend the electricity supply to kg bahagia dated 08 April 2017</p> <p>Complaint: Visited of jkkp (waterside, fireside, fittings) dated 6 Jan 2017</p> <p>Visiting of MPOB dated 10 Jan 2017 regarding the weighbridge the FFB.</p>	Complied
<b>Criterion 1.2:</b>			
Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			

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Criterion / Indicator	Assessment Findings	Compliance	
<p>1.2.1</p> <p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> <li>• Land titles/user rights (Criterion 2.2);</li> <li>• Occupational health and safety plans (Criterion 4.7);</li> <li>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</li> <li>• HCV documentation (Criteria 5.2 and 7.3);</li> <li>• Pollution prevention and reduction plans (Criterion 5.6);</li> <li>• Details of complaints and grievances (Criterion 6.3);</li> <li>• Negotiation procedures (Criterion 6.4);</li> <li>• Continual improvement plans (Criterion 8.1);</li> <li>• Public summary of certification assessment report;</li> <li>• Human Rights Policy (Criterion 6.13).</li> </ul> <p>- Major compliance –</p>	<p>No restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>Genting Plantations Berhad continued to use the annual report for disseminating public information.</p> <p>Policies display at all the office area. Information relating to land titles, SEIA Report, HCV report, Complaint and Grievances procedures, safety and health plans, pollution prevention plans was made available at all operating units including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view. Enquiry register book available in all office to register the request of documents or relevant information.</p> <p>These documents highlight current Genting Plantations Berhad practices and their continual improvement plans.</p>	<p>Complied</p>	
<p><b>Criteria 1.3:</b> Growers and millers commit to ethical conduct in all business operations and transactions.</p>			
<p>1.3.1</p>	<p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>	<p>Genting Plantations Berhad has established policy on ethical conduct and integrity which covers all operations in the plantation operation. Policy displayed on the notice board and communicated to employees.</p> <p>The policy signed by the President &amp; Chief Operating Officer- Mr Yong Chee Kong on 22 June 2015.</p> <p>Interviewed with employees reveal that they are aware of the policy.</p>	<p>Complied</p>
<p><b>Principle 2: Compliance with applicable laws and regulations</b></p>			
<p><b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.</p>			



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Criterion / Indicator	Assessment Findings	Compliance
<p>2.1.1 Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>GSOM and GSPE had continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and PSQM sustainability team. GSOM and GSPE had obtained and renewed license and permits as required by the law. Sample of licenses or permit checked:</p> <p><u>GSOM</u></p> <p>Competent person</p> <p>i) CePSWaM/161292 validity period 15/1/17 – 15/01/18</p> <p>ii) AGT/AESP – NW-NSDK-AGT-0066-M valid until 29/4/18 AESP- NW-NSDK-AE-0091 valid until 4/4/19</p> <p>iii) Engine Driver- SB/16/EIS/02/12 (2<sup>nd</sup> grade)</p> <p>iv) Internal Combustion Engine – SB/12/EIP/01/7 (1<sup>st</sup> grade)</p> <p>License and permit</p> <p>i) DOE compliance schedule#, 001878 validity period (1/7/16 -30/6/17). BOD limit 500 mg/l. Disposal method, compost and land irrigation. ETP capacity 20 mt/hr.</p> <p>ii) Certificate of fitness (CF) for steam boiler (SB) and unfired pressure vessel (UPV)</p> <p>Steam boiler : PMD10666 – inspection completed in 7/1/17. Waiting for the new CF.</p> <p>Sterilizer: PMT56964 valid until 16/9/17, SB PMT 6442 valid until 5/4/18, PMT 56999 valid until 5/4/18.</p> <p>Hoisting crane: PMA 23001, SB PMA 53. Inspection completed in 7/1/17. Waiting for the new CF.</p> <p>iii) Energy Commission license, serial no. 18028, license# 2016/01907 for 1885 kW valid until 31/12/17.</p> <p>iv) MPOB license, 589005026000 valid until 30/9/17</p> <p>v) Permit to employ non-resident workers, under Section 118, Labour Ordinance (Sabah Cap 67), license no. JTK.H.SDK.600-4/1/1/10401/005604 valid until 27/4/17.</p> <p>vi) Fire Certificate, serial# 297580, ref# JBPM:SB/7/262/2016 valid until 7/9/17</p> <p><u>GSPE</u></p> <p>i) MPOB licence 523495002000 for sales and transporting FFB for Genting Sabapalm Estate valid until 30/9/17.</p> <p>ii) MPOB nursery license no. 574439011000 valid until 30/6/17.</p> <p>iii) Energy Commission license, serial no. 20299, license# 2017/00238 for 120 kW valid until 28/4/18.</p> <p>iv) Permit to employ non-resident workers, under Section 118, Labour Ordinance (Sabah Cap 67), license no. JTK.H.SDK.600-4/1/1/012261/005604 valid until 12/8/17.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
2.1.2 A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	<p><u>GSPE</u></p> <p>List of applicable legal documented under LRR @ legal requirement register, SMP-GPB-22. The latest revision of register, rev:4 dated 10/8/16 was made available for verification. The latest Minimum Wages Order 2016 has been incorporated in the register.</p> <p><u>GSOM</u></p> <p>List of applicable legal documented under, rev:7, SO-MGR-03-F01 dated December 2016. Latest legal requirement for mill operation has been updated, i.e FMA, Person In Charge Regulation 2014.</p>	Complied
2.1.3 A mechanism for ensuring compliance shall be implemented. - Minor compliance -	<p>As described in the Procedure on regional, national and international Laws (doc: SMP-GPB-21; revision 1; issue on 14 Aug 2014), mechanism of tracking the changes of laws is contained in the legal requirements register.</p> <p>The person responsible- chief clerk responsible for update the legal requirements register file and disseminate the changes by notice to the respective manage, assistant manager and decisional assistant managers.</p> <p>If the operating unit's current operation does not comply with the new or amended legislation and other requirements, the estate manager shall be briefed to establish and implement new management programmes and/or operation controls.</p> <p>The estate updates the list of relevant laws and regulations that are required to maintain various legal permits.</p>	Complied
2.1.4 A system for tracking any changes in the law shall be implemented. - Minor compliance -	<p>The process of law changes as follows:</p> <ul style="list-style-type: none"> <li>i) Notification of changes from various source of information i.e lawnett, government gazette and sustainability team/HQ.</li> <li>ii) Monitoring for changes in the Law</li> <li>iii) Clarification and review on the changes</li> <li>iv) Updating of the Legal register administered internally</li> <li>v) Notification to the operating units and/or the relevant person in charge</li> </ul> <p>The established legal register has incorporated the latest changes of law.</p>	Complied
<p><b>Criterion 2.2:</b> The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p>		

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Criterion / Indicator	Assessment Findings	Compliance
2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	Copies of land titles for GSPE were sighted. The original copy kept in the headquarters at Wisma Genting, Kuala Lumpur. Following titles checked:  i) Lease No.85109968 (since 17 March 1953) – 1,957.46 Ha  ii) Lease No. 85109977 (since 17 March 1953) – total of 2,118.12 Ha  iii) Lease No. 085319231 (since 21 April 1987) - total area of 283 Ha  The legal use of land was confirmed without any restriction. It is now used for the cultivation of oil palm. Evidence of quit rent for 2016 was verified. Total of 10,770.20 acres of land @ 4,358.58 ha was paid in 2016.	Complied
2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	There is no land dispute in the certification unit and supply base at the time of audit. In Genting Sabapalm estate, auditor verified boundary stone available at the block 98 adjacent to the smallholder.	Complied
2.2.3 Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified.	Complied
2.2.4 There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified.	Complied
2.2.5 For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified.	Complied
2.2.6 To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified.	Complied
<b>Criterion 2.3:</b> Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.		

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Criterion / Indicator	Assessment Findings	Compliance	
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantation Berhad and land ownership documents verified. Interviewed with the smallholder confirmed that no land dispute reported. The estate is surrounded by smallholders and there is no village settlement near the area.	Complied
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities’ decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company’s title, concession or lease on the land. - Minor compliance -	There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantation Berhad and land ownership documents verified. Interviewed with the smallholder confirmed that no land dispute reported. The estate is surrounded by smallholders and there is no village settlement near the area.	Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantation Berhad and land ownership documents verified. Interviewed with the smallholder confirmed that no land dispute reported. The estate is surrounded by smallholders and there is no village settlement near the area.	Complied
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantation Berhad and land ownership documents verified. Interviewed with the smallholder confirmed that no land dispute reported. The estate is surrounded by smallholders and there is no village settlement near the area.	Complied
<b>Principle 3: Commitment to long-term economic and financial viability</b>			
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.			

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Criterion / Indicator	Assessment Findings	Compliance														
3.1.1 A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	Genting Sabapalm Oil Mill (GSOM) and supply bases have established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. Budget and 3 years management plan (projections 2018- 2020) was verified during the audit. Genting Sabapalm Oil Mill and supply bases have made progress towards achieving their performance production targets for the current financial year. The budget was include the mature upkeep cost, manuring cost, harvesting/collection cost, transportation cost, replanting cost, scout harvesting cost, nursery, general cost, salaries/wages, capital expenditure, plant & machinery (processing and others), OER, KER, Crop intake, processing cost and etc.	Complied														
3.1.2 An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	Long range proposed replanting programme was verified form 2016 to 2025. Previous replanting programme (2009-2015) for the total of 1, has yet to be completed and deferred until 2017. Reason for replanting is due to age of planting and P&D infected palm mainly on Ganoderma. 2017 – Sapi Division (82.31 ha) 2018 – Klagan and Sapi Division (198.14 ha)  GSPE has to conduct EIA/PMM prior to the next replanting project.  The replanting programme for Genting Sabapalm Estate was established. Sighted Replanting Programme 2017-2025: <table border="1" data-bbox="660 1200 1139 1384"> <thead> <tr> <th>Year</th> <th>Estate</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>2017</td> <td rowspan="5">GSPE</td> <td>82.31</td> </tr> <tr> <td>2018</td> <td>198.14</td> </tr> <tr> <td>2019</td> <td>137.88</td> </tr> <tr> <td>2020</td> <td>174.51</td> </tr> <tr> <td>2021</td> <td>158.87</td> </tr> </tbody> </table>	Year	Estate	Ha	2017	GSPE	82.31	2018	198.14	2019	137.88	2020	174.51	2021	158.87	Complied
Year	Estate	Ha														
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<b>Principle 4: Use of appropriate best practices by growers and millers</b>																
<b>Criterion 4.1:</b> Operating procedures are appropriately documented, consistently implemented and monitored.																

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.1.1</p> <p>Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p>	<p>At GSOM, the procedure was established and maintained. There was 3 tiers of procedure that established which were Procedure Manual, System Procedure, Standard Operating Manual, Safe Operating Procedure and Environmental Control Procedure.</p> <p>At Genting Sabapalm Estate, the Sustainability Management Procedure Manual, Standard Operating Procedures (SOP) and The Oil Palm Manual (latest update on 30/8/13) were established. The manual covering the activity for replanting, oil palm nursery practices, planting techniques, soil conservation and terracing, pest and diseases, weed management, manuring of oil palm, immaturity, harvesting, crop forecasting and managing difficult soils. All of the activities have been described comprehensively in the Standard operating procedure (SOP) and pictorial SOP. All the estate implemented through its daily operations.</p> <p>The procedure for Occupational Health and Safety has been established and implemented. Sighted the procedure for Accident investigation, PTW, PPE, workshop, harvesting, manuring, pest &amp; disease were available during the assessment.</p>	<p>Complied</p>
<p>4.1.2</p> <p>A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -</p>	<p>The mechanism to check consistent implementation for all the activities carried out in the estate/mill was through:</p> <p><u>GSPE</u></p> <ol style="list-style-type: none"> <li>1. Workplace inspection was last conducted on December 16 by OSH team committee members who cover harvesting, water treatment plant, immature, (P&amp;D gang). The workplace inspection for the EFB application, contractor management and driver was carried out on September 16.</li> <li>2. The internal audit was conducted by Sustainability Department on 21/10/2016 to cover all the indicators of RSPO.</li> </ol> <p><u>GSOM</u></p> <ol style="list-style-type: none"> <li>1. Safety audit was last conducted on 20/2/2017 by OSH team committee members who covered sterilizer, loading ramp, press, kernel plant, oil room, boiler and etc.</li> </ol> <p>The internal audit was conducted by Sustainability Department on 24/3/16 to cover all the indicators of RSPO.</p>	<p>Complied</p>
<p>4.1.3</p> <p>Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -</p>	<p>All the record and action taken by the management was maintained and available during this assessment for review.</p>	<p>Complied</p>
<p>4.1.4</p> <p>The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -</p>	<p>The origin all third party sourced FFB recorded in weighbridge report and production report. From mass balance sheet, the volume of certified and non-certified FFB segregated for traceability. List of approved supplier was verified dated 4/4/17. At present there are 214 smallholders@ FFB suppliers and contributing 25% of the total FFB received at GSOM.</p>	<p>Complied</p>

**Criterion 4.2:**

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

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<p>4.2.1</p> <p>There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -</p>	<p>GSPE practices good agricultural practices as contained in their SOPs (Oil Palm Manual, dated 30/8/2013). They are followed to manage the soil fertility to levels ensuring optimal and sustainable yields.</p> <p>One of the SOP procedures, OPM 7: Manuring of Oil Palm is referred for managing soil fertility. It includes sections on :</p> <ul style="list-style-type: none"> <li>a) Introduction</li> <li>b) Nursery manuring</li> <li>c) Field Manuring</li> <li>d) Application of Fertiliser</li> <li>e) Fertiliser delivery and Stock Reports for estates</li> <li>f) Fertiliser sampling for analysis</li> <li>g) Manuring Schedule</li> <li>h) Method of application for younger and mature palms</li> </ul>	<p>Complied</p>
<p>4.2.2</p> <p>Records of fertiliser inputs shall be maintained. - Minor compliance -</p>	<p>Fertilizers are applied as per agronomist recommendation. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators.</p> <p><u>GSPE</u> 2017 Fertiliser Programme by Genting Plantations Research Centre dated 30/07/2016 was sighted. The recommended fertilizer and total tonnage as follow:</p> <ol style="list-style-type: none"> <li>1. AS : 2,397.50 mt</li> <li>2. BRP : 1,041.30 mt</li> <li>3. MOP : 2,357.60 mt</li> <li>4. ERP : 725.90 mt</li> <li>5. B : 32.50 mt</li> </ol> <p>The latest application was carried out at block 36 (GSPE) on 8/4/2017 for MOP 60 (2kg/palm).</p>	<p>Complied</p>
<p>4.2.3</p> <p>There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -</p>	<p><u>GSPE</u> The agronomist from GPRC will visit the estate and conduct the sampling on annual basis. They will provide a fertiliser recommendation based on the foliar and soil sampling analysis. Foliar analysis was conducted on Jan-Feb 16 and the samples were sent to GPRC Laboratory for tested. The foliar analysis report (PR51/2016) dated 14/4/2016 was sighted.</p> <p>Soil analysis was conducted on September 2010 by GPRC Laboratory. The soil analysis result 2011 was sighted.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance																																		
<p>4.2.4</p> <p>A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -</p>	<p>In the SOP Manual, OPM 7: Manuring of Oil Palm, the nutrient strategy includes the use of Empty Fruit Bunches (EFB) distributed in the field to improve the soil structure as well as to improve the organic matter.</p> <p>In Section 3.1.1 EFB Mulching , it documents the application on immature palm :</p> <p>a) Rate and frequency of application b) Method of application c) Cost of large scale application d) Manuring for EFB Mulched Immature Palm</p> <p>In Section 3.2.1 EFB Mulching , it documents the application on mature palm :</p> <p>a) Method of application b) Manuring of EFB Mulched Palms</p> <p>For GSPE, EFB mulching was not recommended by GPRC, however the EFB was received for supplementary purpose for Immature Area.</p> <p>Records of distribution / received are recorded in the EFB Daily Report (Immature).</p> <p>The last EFB was received as below:</p> <table border="1" data-bbox="660 1115 1299 1211"> <thead> <tr> <th>Date</th> <th>Estate</th> <th>Tonnage</th> </tr> </thead> <tbody> <tr> <td>Mar 17</td> <td>GSPE</td> <td>32.23 mt</td> </tr> </tbody> </table>	Date	Estate	Tonnage	Mar 17	GSPE	32.23 mt	<p>Complied</p>																												
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<p><b>Criterion 4.3:</b> Practices minimise and control erosion and degradation of soils.</p>																																				
<p>4.3.1</p> <p>Maps of any fragile soils shall be available. - Major compliance -</p>	<p>Soil series map available for both estates visited.Sighted the type of soil available at GSPE:</p> <table border="1" data-bbox="660 1368 1299 1644"> <thead> <tr> <th>No.</th> <th>Type of Soil</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Lokan</td> </tr> <tr> <td>2</td> <td>Lungmanis</td> </tr> <tr> <td>3</td> <td>Kinabatangan</td> </tr> <tr> <td>4</td> <td>Sapi</td> </tr> <tr> <td>5</td> <td>Dalit</td> </tr> <tr> <td>6</td> <td>Tuaran</td> </tr> <tr> <td>7</td> <td>Weston</td> </tr> <tr> <td>8</td> <td>Klias</td> </tr> </tbody> </table> <p>Peat and acid sulphates soils were also identified. Type of fragile/marginal soil map was sighted:</p> <table border="1" data-bbox="660 1760 1299 1883"> <thead> <tr> <th>No.</th> <th>Type of Soil</th> <th>Ha.</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Mineral Soil</td> <td>2822.00</td> <td>64.75</td> </tr> <tr> <td>2</td> <td>Peat Soil</td> <td>1325.00</td> <td>30.40</td> </tr> <tr> <td>3</td> <td>Acid Sulphate Soil</td> <td>211.58</td> <td>4.85</td> </tr> </tbody> </table>	No.	Type of Soil	1	Lokan	2	Lungmanis	3	Kinabatangan	4	Sapi	5	Dalit	6	Tuaran	7	Weston	8	Klias	No.	Type of Soil	Ha.	%	1	Mineral Soil	2822.00	64.75	2	Peat Soil	1325.00	30.40	3	Acid Sulphate Soil	211.58	4.85	<p>Complied</p>
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4.3.2 A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	<p>The estate will refer to the following procedures for guidance</p> <p>a) OPM 4 : Soil conservation and terracing (rev 2013) b) Steep land Management SMP –GPB-10</p> <p>The estate also has a file known as File 56: Estate Maps &amp; Satellite Images where the following are identified for reference :</p> <p>a) Soil Map b) Slope class map c) Blocking map d) Riparian buffer zone map</p> <p>Soil maps and slope maps were sighted at GSPE.</p> <p>Slope classes for GSPE are:</p> <table border="1" data-bbox="660 853 1294 1003"> <thead> <tr> <th>Estate</th> <th>Slope (degree)</th> <th>%</th> </tr> </thead> <tbody> <tr> <td rowspan="4">GSPE</td> <td>0-6</td> <td>98.49%</td> </tr> <tr> <td>6-10</td> <td>1.37%</td> </tr> <tr> <td>10-15</td> <td>0.14%</td> </tr> <tr> <td>15-20</td> <td>0.00%</td> </tr> </tbody> </table>	Estate	Slope (degree)	%	GSPE	0-6	98.49%	6-10	1.37%	10-15	0.14%	15-20	0.00%	Complied
Estate	Slope (degree)	%												
GSPE	0-6	98.49%												
	6-10	1.37%												
	10-15	0.14%												
	15-20	0.00%												
4.3.3 A road maintenance programme shall be in place. - Minor compliance -	<p>The road maintenance programme is found in the 'Road Grading and Compacting Road Programme. The monthly road maintenance programme was sighted. The latest road maintenance for GSPE was carried out on March 2017 at blocks 1-29 Div Sapi.</p>	Complied												
4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	<p>Based on the soil map, there is peat soil at GSPE. The water management plan which includes the peat soil area. Sighted the programme:</p> <ol style="list-style-type: none"> <li>Maintain water level at 50 – 75 cm through monitoring of Piezometer. Last monitoring was carried out on 27/3/17.</li> <li>Control peat subsidence ;</li> <li>Maintain main drain, field drain and collection drain sizes/specs as per policy and procedure; Periodic flushing of the acidic and excessive storm water and annual desilting/degrassing of the canals, main and collection drains.</li> </ol>	Complied												
4.3.5 Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	<p>The replanting area at GSPE for 2016 involved with peat area. The assessments namely Land Preparation for Replanting Work dated 28/2/2015 was carried accordingly prior to replanting at that area (Blok 81A).</p>	Complied												

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4.3.6	<p>A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils).</p> <p>- Minor compliance -</p>	<p>Based on the soil map, there is peat soil at GSPE. The water management plan which was include the peat soil area at GSPE. Sighted the programme:</p> <ol style="list-style-type: none"> <li>Maintain water level at 50 – 75 cm through monitoring of Piezometer. Last monitoring was carried out on 27/3/17.</li> <li>Control peat subsidence ;</li> <li>Maintain main drain, field drain and collection drain sizes/specs as per policy and procedure;</li> </ol> <p>Periodic flushing of the acidic and excessive storm water and annual desilting/degrassing of the canals, main and collection drains.</p>	Complied								
<p><b>Criterion 4.4:</b> Practices maintain the quality and availability of surface and ground water.</p>											
4.4.1	<p>An implemented water management plan shall be in place.</p> <p>- Minor compliance -</p>	<p>Water management plan was established for GSOM and GSPE. The plan was implemented and monitored on monthly basis by Mill Engineer and Estate Assistant Manager.</p> <p><u>GSOM</u> Water Sampling analysis was conducted on 21/02/2017 which was analysed by Dynakey Laboratories Sdn Bhd. The result shown all the parameters were within the limit.</p> <p>GSOM monitored its water consumption on monthly basis for the source of water supply for its mill process usage.</p> <table border="1" data-bbox="662 1115 1099 1294"> <thead> <tr> <th>Year</th> <th>Water consumed/ mt FFB</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>1.87 m<sup>3</sup></td> </tr> <tr> <td>2016</td> <td>1.82 m<sup>3</sup></td> </tr> <tr> <td>2017 (todate Mar 17)</td> <td>1.73 m<sup>3</sup></td> </tr> </tbody> </table> <p><u>GSPE</u> Water Sampling analysis was conducted on 23/01/2017 which was analysed by Dynakey Laboratories Sdn Bhd. The result shown there is presence of coliform. The management had established the action plan- install chlorine dosing pump, which was completed on 10/4/2017 by Chemindus Sdn Bhd.</p> <p>Water consumption monitoring was done on monthly basis. For March 2017, the domestic usage was recorded 27,361 m<sup>3</sup> (Kwan Div and Sapi Div) and 91 m<sup>3</sup> (Bangkawat Div and Klagan Div)</p>	Year	Water consumed/ mt FFB	2015	1.87 m <sup>3</sup>	2016	1.82 m <sup>3</sup>	2017 (todate Mar 17)	1.73 m <sup>3</sup>	Complied
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Criterion / Indicator	Assessment Findings	Compliance										
4.4.2 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -	Based on the upstream and downstream analysis, all the parameters have been complied with. Analysis was done once and every month and submitted to the authority on quarterly basis. The following parameters (BOD, TSS, Ammonical Nitrogen, Total Nitrogen, Oil & Grease, pH, COD, Total Suspended Solids) are checked by independent Lab, Chemsain Konsultan Sdn Bhd (2/12/16) for GSPE and Dynakey Laboratories Sdn Bhd (14/3/17) for GSOM. <table border="1" data-bbox="662 651 1107 857"> <thead> <tr> <th>Estate</th> <th>Month</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>GSPE</td> <td>Upstream &amp; downstream (20/9/16)</td> <td>Within Spec</td> </tr> <tr> <td>GSOM</td> <td>Upstream &amp; downstream (14/3/17)</td> <td>Within spec</td> </tr> </tbody> </table>	Estate	Month	Result	GSPE	Upstream & downstream (20/9/16)	Within Spec	GSOM	Upstream & downstream (14/3/17)	Within spec	Complied	
Estate	Month	Result										
GSPE	Upstream & downstream (20/9/16)	Within Spec										
GSOM	Upstream & downstream (14/3/17)	Within spec										
4.4.3 Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	Based on the effluent final discharge analysis, all the parameters have been complied with. Analysis was done once and every month and submitted to the authority on quarterly basis. The following parameters (BOD, TSS, Ammonical Nitrogen, Total Nitrogen, Oil & Grease, pH, COD, Total Suspended Solids) are checked by independent Lab, independent Lab, Dynakey Laboratories Sdn Bhd. <table border="1" data-bbox="662 1122 1294 1234"> <thead> <tr> <th>Month</th> <th>14/3/17</th> <th>20/2/17</th> <th>15/1/17</th> <th>30/12/16</th> </tr> </thead> <tbody> <tr> <td>ETP Final Discharge Results</td> <td>Within Spec</td> <td>Within Spec</td> <td>Within Spec</td> <td>Within Spec</td> </tr> </tbody> </table> <p>Quarterly report to DOE has been forwarded. The following record has been reviewed and report dated: 6<sup>th</sup> Apr 2017, 7<sup>th</sup> Jan 2017, 19<sup>th</sup> Oct 2016 were sighted during the audit.</p>	Month	14/3/17	20/2/17	15/1/17	30/12/16	ETP Final Discharge Results	Within Spec	Within Spec	Within Spec	Within Spec	Complied
Month	14/3/17	20/2/17	15/1/17	30/12/16								
ETP Final Discharge Results	Within Spec	Within Spec	Within Spec	Within Spec								
4.4.4 Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	GSOM monitored its water consumption on monthly basis for the source of water supply for its mill process usage. <table border="1" data-bbox="662 1487 1102 1637"> <thead> <tr> <th>Year</th> <th>Water consumed</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>1.87 m<sup>3</sup></td> </tr> <tr> <td>2016</td> <td>1.82 m<sup>3</sup></td> </tr> <tr> <td>2017 (todate Mar 17)</td> <td>1.73 m<sup>3</sup></td> </tr> </tbody> </table>	Year	Water consumed	2015	1.87 m <sup>3</sup>	2016	1.82 m <sup>3</sup>	2017 (todate Mar 17)	1.73 m <sup>3</sup>	Complied		
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<b>Criterion 4.5:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.												

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<p>4.5.1 Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -</p>	<p>Documented IPM is found in the Oil Palm Manual under 'Pest and disease (revision June 2013 ) OPM 5. It identified the pest such as :</p> <ul style="list-style-type: none"> <li>a) bagworms</li> <li>b) nettle caterpillars</li> <li>c) Grasshopper</li> <li>d) Rhinoceros beetles</li> <li>e) Bunch moth</li> <li>f) Vertebrates such as rats</li> <li>g) Pest &amp; Diseases in nursery</li> <li>h) Ganoderma</li> </ul> <p>The estates also monitors the following for IPM :</p> <ul style="list-style-type: none"> <li>a) Rat damage census</li> <li>b) Beneficial plant planting</li> <li>c) weed management</li> </ul> <p>Sighted File 58, Integrated Pest Management:</p> <table border="1" data-bbox="660 958 1297 1032"> <thead> <tr> <th></th> <th>Chain covered</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>Beneficial Plant</td> <td>511.28 chain</td> <td>GSPE</td> </tr> </tbody> </table> <p>The occupancy rate for Barn owl box on Oct 2016.</p> <table border="1" data-bbox="660 1093 1297 1167"> <thead> <tr> <th></th> <th>Occupancy rate</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>Barn owl</td> <td>0 %</td> <td>GSPE</td> </tr> </tbody> </table> <p>Grass cutting/rotor slasher (2 units) was used covering all immature division.</p> <p>The census for Rat attack was conducted on 25/2/2017. There are a few fields with fresh damage above than 5%. The rat baiting programme was started accordingly at field 58 and 59B. The census after the rat baiting on 3/4/2017 shown that the acceptance was less than 20%.</p>		Chain covered	Estate	Beneficial Plant	511.28 chain	GSPE		Occupancy rate	Estate	Barn owl	0 %	GSPE	<p>Complied</p>
	Chain covered	Estate												
Beneficial Plant	511.28 chain	GSPE												
	Occupancy rate	Estate												
Barn owl	0 %	GSPE												
<p>4.5.2 Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -</p>	<p>Training records for staff and workers on IPM implementation were available and verified to be satisfactory during on-site assessment.</p> <table border="1" data-bbox="660 1534 1297 1624"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>29/3/2017</td> <td>IPM training</td> <td>GPRC</td> <td>GSPE</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Estate	29/3/2017	IPM training	GPRC	GSPE	<p>Complied</p>				
Date	Training Topic	Trainer	Estate											
29/3/2017	IPM training	GPRC	GSPE											
<p><b>Criterion 4.6:</b> Pesticides are used in ways that do not endanger health or the environment</p>														

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<p>4.6.1</p> <p>Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available.</p> <p>- Major compliance -</p>	<p>The SOP and the Justification of Pesticide used is sighted in the SMP-GPB-28.</p> <p>It records the :</p> <ul style="list-style-type: none"> <li>a) Crop stage</li> <li>b) Application Type</li> <li>c) Pesticide Names</li> <li>d) Active Ingredient</li> <li>e) Class ( by Pesticide Malaysia )</li> <li>f) WHO class</li> <li>g) Target Weed/Pest</li> <li>h) Justification of Use</li> </ul>	<p>Complied</p>						
<p>4.6.2</p> <p>Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided.</p> <p>- Major compliance -</p>	<p>Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications was maintained.</p> <table border="1" data-bbox="660 837 1299 929"> <thead> <tr> <th></th> <th>2015</th> <th>2016</th> </tr> </thead> <tbody> <tr> <td>GSPE</td> <td>1.10 % a.i/ha</td> <td>1.29 % a.i/ha</td> </tr> </tbody> </table>		2015	2016	GSPE	1.10 % a.i/ha	1.29 % a.i/ha	<p>Complied</p>
	2015	2016						
GSPE	1.10 % a.i/ha	1.29 % a.i/ha						
<p>4.6.3</p> <p>Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines.</p> <p>- Major compliance -</p>	<p>Use of pesticide is minimized and part of the IPM programme. To reduce chemical use the following is implemented in GSPE.</p> <ul style="list-style-type: none"> <li>a) Planting of beneficial plant</li> <li>b) Barn Owls</li> <li>c) Cattle</li> </ul> <p>Documented IPM is found in the Oil Palm Manual under 'Pest and disease (revision June 2013 ) OPM 5 . It identified the pest such as :</p> <ul style="list-style-type: none"> <li>a) bagworms</li> <li>b) nettle caterpillars</li> <li>c) Grasshopper</li> <li>d) Rhinoceros beetles</li> <li>e) Bunch moth</li> <li>f) Vertebrates such as rats</li> <li>g) Pest &amp; Diseases in nursery</li> <li>h) Ganoderma</li> </ul> <p>It also shows the lifecycles, type of species as well as the chemical, physical and biological control method recommended. Prophylactic used is confined to the spray in the oil palm nursery whereby the seedlings are ensured to be protected.</p> <p>Sighted the pesticides usage monitoring record for 2015 and 2016 was increase because of replanting/immature area.</p>	<p>Complied</p>						

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4.6.4 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -	There is no pesticide that are categorised as World Health Organisation Class 1A or 1B at GSPE.	Complied								
4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	Training for both estates was conducted accordingly. <table border="1" data-bbox="659 792 1297 887"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>29/3/2017</td> <td>IPM training</td> <td>GPRC</td> <td>GSPE</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Remarks	29/3/2017	IPM training	GPRC	GSPE	Complied
Date	Training Topic	Trainer	Remarks							
29/3/2017	IPM training	GPRC	GSPE							
4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.	Complied								
4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sustainability Management Procedure Manual, SMP-GPB-28.  GSPE have tried various method of application that is proven methods that minimise risk and impacts. Some of the spray method used are Inter Pump (10 lit / pump) and PB16 with low volume nozzle.	Complied								
4.6.8 Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No aerial spraying was carried out at GSPE.	Complied								
4.6.9 Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	No associated smallholders. However the management of GSOM conducted the training on FFB grading to the independent smallholders on 30/3/2017 which were trained by MPOB officers.	Complied								

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Criterion / Indicator		Assessment Findings	Compliance																				
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	GSPE disposed the empty chemical containers as per scheduled waste regulation.	Complied																				
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	Annual medical surveillance for sprayers and pesticide operators were demonstrated. Latest was conducted on 8/4/17. The report still in progress.  Medical examination programme established for sprayers in 2016 which conducted by Klinik Elopura Sdn Bhd-HQ/12/DOC/00/259.	Complied																				
		<table border="1"> <thead> <tr> <th>ID No</th> <th>Date of Medical check up</th> <th>Result</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>E10102</td> <td>13/4/16</td> <td>Fit To Work</td> <td>GSPE</td> </tr> <tr> <td>E10984</td> <td>13/4/16</td> <td>Fit To Work</td> <td>GSPE</td> </tr> <tr> <td>E10011</td> <td>13/4/16</td> <td>Fit To Work</td> <td>GSPE</td> </tr> <tr> <td>E10010</td> <td>13/4/16</td> <td>Fit To Work</td> <td>GSPE</td> </tr> </tbody> </table>	ID No	Date of Medical check up	Result	Estate	E10102	13/4/16	Fit To Work	GSPE	E10984	13/4/16	Fit To Work	GSPE	E10011	13/4/16	Fit To Work	GSPE	E10010	13/4/16	Fit To Work	GSPE	
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4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	There is no female sprayers that were pregnant at GSPE (Bangkawat Div). Sighted monthly examination record by HA:	Complied																				
		<table border="1"> <thead> <tr> <th>ID No</th> <th>Date</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>E10102</td> <td>4/4/17</td> <td>Family planning Injection</td> </tr> <tr> <td>E10984</td> <td>17/3/17</td> <td>Family planning Injection</td> </tr> <tr> <td>E10011</td> <td>17/3/17</td> <td>Monopouse</td> </tr> <tr> <td>E10010</td> <td>17/3/17</td> <td>Not pregnant</td> </tr> </tbody> </table>	ID No	Date	Result	E10102	4/4/17	Family planning Injection	E10984	17/3/17	Family planning Injection	E10011	17/3/17	Monopouse	E10010	17/3/17	Not pregnant						
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<b>Criterion 4.7:</b>																							
An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:																							

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<p>4.7.1</p> <p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p>	<p>The Occupational Safety And Health Policy was established, signed by President and Chief Operating Officer on 1<sup>st</sup> July 2015.</p> <p>OHS plan for 2017 dated 12/1/2017 (GSPE) and 2/1/2017 (GSOM) has been established. The OHS plan comprises of OSH objectives, OSH policy, training, accident &amp; incident statistic, OSH meetings, HIRARC, emergency response plan (ERP), First aid kit, audit inspection, CHRA, Medical surveillance, audiometric test etc.</p> <p>i) Chemical Health Risk Assessment (CHRA) CHRA was conducted on 19/6/14 (GSPE) by QMSPRO Training &amp; Consultancy (JKKP HIE 127/171-2(154)). The action plan for 2017 was established through the recommendation from the assessor.</p> <p>CHRA was conducted on 13/6/2015 (GSOM) by Envosha Sdn Bhd (JKKP HIE 127/171-2(160)). The action plan for 2017 was established through the recommendation from the assessor.</p> <p>ii) Annual Audiometry Audiometric testing was conducted on 2/2/2017 by DAB OH Sdn Bhd. (HQ/10/DOC/00/167). Total workers tested 19. Only 2 workers were found with hearing impairment. The assessor recommended carry out annual audiometric testing for those who were found with hearing impairment.</p> <p>iii) Medical Surveillance 12 workers were sent on 23-25/8/2016 for medical surveillance for those who are involved with chemical, refer to medical surveillance report by registered OHD from Klinik Elopura Sdn Bhd, HQ/12/DOC/00/259. All the operators were found fit to work.</p> <table border="1" data-bbox="660 1444 1246 1624"> <thead> <tr> <th>ID No</th> <th>Station</th> <th>Result</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>E00100</td> <td>WTP</td> <td>Fit To Work</td> <td>GSOM</td> </tr> <tr> <td>E00146</td> <td>Boiler</td> <td>Fit To Work</td> <td>GSOM</td> </tr> <tr> <td>E00213</td> <td>Workshop</td> <td>Fit To Work</td> <td>GSOM</td> </tr> <tr> <td>E00011</td> <td>Store</td> <td>Fit To Work</td> <td>GSOM</td> </tr> <tr> <td>E00154</td> <td>Lab</td> <td>Fit To Work</td> <td>GSOM</td> </tr> </tbody> </table>	ID No	Station	Result	Result	E00100	WTP	Fit To Work	GSOM	E00146	Boiler	Fit To Work	GSOM	E00213	Workshop	Fit To Work	GSOM	E00011	Store	Fit To Work	GSOM	E00154	Lab	Fit To Work	GSOM	<p>Complied</p>
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<p>4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.                      - Major compliance -</p>	<p>The hazard identification, risk assessment and determining control for GSOM and GSPE were established. This was prepared by Assistant Manager, reviewed by Sr Assistant Manager and approved by Estate/Mill Manager. The latest review was done on 15/2/17 (GSPE) and 23/1/17 (GSOM).                      Eg: Weighbridge, Loading Ramp, Sterilizer, Threshing Station, Pressing Station, Clarification, Nut Cracking Station, Kernel Plant, Kernel Storage, CPO Storage, Boiler Station, Engine room, workshop, General-cleaning and others, Store, EFB Press, Laboratory, WTP, Sterilizer, Landfill, Manuring, Chemical mixing, spraying, trunk injection, harvesting, road maintenance, pruning, FFB transport, confined space, construction of boiler, construction of biogas plant, nursery, FFB evacuation using superbull, replanting and etc.</p>	<p>Complied</p>																																																			
<p>4.7.3</p> <p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.                      - Minor compliance -</p>	<p>Training Scheduled for 2017 was established. Awareness and training programme had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. Suitable PPE has been provided to the workers based on the information in the MSDS/CSDS and CHRA assessor’s recommendation.</p> <table border="1" data-bbox="660 1070 1291 1559"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>29/3/2017</td> <td>IPM training</td> <td>GPRC</td> <td rowspan="10">GSPE</td> </tr> <tr> <td>1/4/2017</td> <td>Tractor</td> <td>AM</td> </tr> <tr> <td>6/2/2017</td> <td>Spraying</td> <td>Staff</td> </tr> <tr> <td>6/2/2017</td> <td>HIRARC</td> <td>Staff</td> </tr> <tr> <td>6/2/2017</td> <td>Manuring</td> <td>GPRC</td> </tr> <tr> <td>13/2/2017</td> <td>Harvesting</td> <td>Staff</td> </tr> <tr> <td>26/1/2017</td> <td>PPE</td> <td>Staff</td> </tr> <tr> <td>20/2/2017</td> <td>ERP (Fire)</td> <td>AM</td> </tr> <tr> <td>1/4/2017</td> <td>EFB &amp; PPE</td> <td>Staff</td> </tr> <tr> <td>3/3/2017</td> <td>WTP</td> <td>AM</td> </tr> <tr> <td>1/4/2017</td> <td>Fire Drill</td> <td>ERT</td> <td rowspan="5">GSOM</td> </tr> <tr> <td>13/3/2017</td> <td>Laboratory</td> <td>Staff</td> </tr> <tr> <td>24/3/2017</td> <td>Processing</td> <td>Supervisor</td> </tr> <tr> <td>11/5/2016</td> <td>Workshop</td> <td>Staff</td> </tr> <tr> <td>13/5/2016</td> <td>Boiler</td> <td>Staff</td> </tr> </tbody> </table> <p>Procedure for “<i>Pengendalian FFB Grading</i>” (GSOM-SOP-PRD-01) and GSOM HIRARC (station: FFB grading) stated that the FFB grader and helper need to wear Safety Helmet and Safety shoes. However, during site visit at FFB grading area (GSOM), found that:</p> <ol style="list-style-type: none"> <li>1. FFB graders were not wearing appropriate safety helmet,</li> <li>2. FFB helper from GSPE (E10826) was not wearing appropriate safety shoes,</li> <li>3. Safety shoes that used by FFB graders (E00249 and E00254) were not in good condition.</li> </ol> <p>Thus, minor NCR # 1463422-201704-N2 was raised.</p>	Date	Training Topic	Trainer	Remarks	29/3/2017	IPM training	GPRC	GSPE	1/4/2017	Tractor	AM	6/2/2017	Spraying	Staff	6/2/2017	HIRARC	Staff	6/2/2017	Manuring	GPRC	13/2/2017	Harvesting	Staff	26/1/2017	PPE	Staff	20/2/2017	ERP (Fire)	AM	1/4/2017	EFB & PPE	Staff	3/3/2017	WTP	AM	1/4/2017	Fire Drill	ERT	GSOM	13/3/2017	Laboratory	Staff	24/3/2017	Processing	Supervisor	11/5/2016	Workshop	Staff	13/5/2016	Boiler	Staff	<p>Minor nonconformance</p>
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<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>OSH Committees meeting conducted quarterly and meeting minutes includes issues raised and action taken form workplace inspection report etc. The discussion on the accident review, workplace inspection, safety improvement plan, issues from workers, training, complaints has been discussed and action to be taken. There was no major issue.</p> <p>Genting Sabapalm Estate SHC organization chart for 2017 i) Chairman – Estate Manager ii) Secretary – HA (#1: 22/3/17, #4;15/12/16, #3: 14/9/16, #2: 17/6/16)</p> <p>Genting Sabapalm Oil Mill SHC organization chart for 2017 i) Chairman – Sr Ast Manager ii) Secretary – Project Engineer (#1: 21/2/17, #4:15/11/16, #3: 17/8/16, #2: 24/5/16)</p>	<p>Complied</p>
<p>4.7.5</p> <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -</p>	<p>Accident and emergency procedures have been communicated to employees, contractors and visitors. Fire evacuation drill was last conducted on 20/2/2017 (GSPE) to test the state of readiness during emergency situation. Workers trained in First Aider were present in the mill and field operations.</p> <p>First aid box provided at harvesting area and was inspected by HA on Nov 2016. However, expired items (Dettol antiseptic and yellow lotion expired in July 2016 and Dec. 2016) were still kept inside the first aid box no 19.</p> <p>Thus, minor NCR # 1463422-201704-N3 was raised.</p> <p><u>GSPE</u> There is 1 accident occurred on 30/3/17 with 2 days MC at harvesting area. JKPP 8 for 2016 was sent to DOSH on 3/1/2017.</p> <p><u>GSOM</u> There is no accident with lost manday occurred in 2016 and 2017 (todate Mar 17). JKPP 8 for 2016 was sent to DOSH on 21/1/2017.</p>	<p>Minor nonconformance</p>

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4.7.6 All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -	<p>Medical care is provided to all the employees. Local workers are covered under SOCSO scheme while foreign workers are covered under foreign workers compensation scheme.</p> <table border="1" data-bbox="660 506 1297 860"> <thead> <tr> <th>Insurance</th> <th>Period</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>Etiqa Insurance Berhad (CWF-L5011982-F3)</td> <td>1/1/17 – 31/12/17</td> <td rowspan="2">GSPE</td> </tr> <tr> <td>SOCSO</td> <td>Mar 17, Feb 17, Jan 17</td> </tr> <tr> <td>Lonpac Insurance Bhd (S/17/WF00/012 527/SDK-20)</td> <td>1/1/17 – 31/12/17</td> <td rowspan="2">GSOM</td> </tr> <tr> <td>SOCSO</td> <td>Mar 17, Feb 17, Jan 17</td> </tr> </tbody> </table>	Insurance	Period	Remark	Etiqa Insurance Berhad (CWF-L5011982-F3)	1/1/17 – 31/12/17	GSPE	SOCSO	Mar 17, Feb 17, Jan 17	Lonpac Insurance Bhd (S/17/WF00/012 527/SDK-20)	1/1/17 – 31/12/17	GSOM	SOCSO	Mar 17, Feb 17, Jan 17	Complied
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SOCSO	Mar 17, Feb 17, Jan 17														
4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>Records on Lost Time Accident (LTA) metrics was maintained and based on accident statistic monitoring, JKPP 6, 7 &amp; 8. Sample of accident statistic as shown below:</p> <table border="1" data-bbox="660 999 1177 1093"> <thead> <tr> <th>Year</th> <th>GSPE</th> <th>GSOM</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>8</td> <td>0</td> </tr> <tr> <td>2017 (todate Mar 17)</td> <td>2</td> <td>0</td> </tr> </tbody> </table> <p>*LTA is equivalent to lost man days</p>	Year	GSPE	GSOM	2016	8	0	2017 (todate Mar 17)	2	0	Complied				
Year	GSPE	GSOM													
2016	8	0													
2017 (todate Mar 17)	2	0													
<p><b>Criterion 4.8:</b> All staff, workers, smallholders and contract workers are appropriately trained.</p>															

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Criterion / Indicator	Assessment Findings	Compliance																																																																		
4.8.1 A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -	<p>Training Scheduled for 2017 was established. Awareness and training programme had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. Suitable PPE has been provided to the workers based on the information in the MSDS/CSDS and CHRA assessor’s recommendation.</p> <table border="1" data-bbox="660 651 1294 1402"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>29/3/2017</td> <td>IPM training</td> <td>GPRC</td> <td rowspan="13">GSPE</td> </tr> <tr> <td>1/4/2017</td> <td>Tractor</td> <td>AM</td> </tr> <tr> <td>6/2/2017</td> <td>Spraying</td> <td>Staff</td> </tr> <tr> <td>6/2/2017</td> <td>HIRARC</td> <td>Staff</td> </tr> <tr> <td>6/2/2017</td> <td>Manuring</td> <td>GPRC</td> </tr> <tr> <td>13/2/2017</td> <td>Harvesting</td> <td>Staff</td> </tr> <tr> <td>26/1/2017</td> <td>PPE</td> <td>Staff</td> </tr> <tr> <td>20/2/2017</td> <td>ERP (Fire)</td> <td>AM</td> </tr> <tr> <td>1/4/2017</td> <td>EFB &amp; PPE</td> <td>Staff</td> </tr> <tr> <td>3/3/2017</td> <td>WTP</td> <td>AM</td> </tr> <tr> <td>5/4/2017</td> <td>Recycle &amp; RSPO</td> <td>Staff</td> </tr> <tr> <td>1/4/2017</td> <td>Effluent Overflow Drill</td> <td>ERT</td> <td rowspan="8">GSOM</td> </tr> <tr> <td>1/4/2017</td> <td>Spillage Drill</td> <td>ERT</td> </tr> <tr> <td>1/4/2017</td> <td>Fire Drill</td> <td>ERT</td> </tr> <tr> <td>13/3/2017</td> <td>Laboratory</td> <td>Staff</td> </tr> <tr> <td>24/3/2017</td> <td>Processing</td> <td>Supervisor</td> </tr> <tr> <td>7/11/2016</td> <td>MPOB Grading</td> <td>MPOB Officers</td> </tr> <tr> <td>11/5/2016</td> <td>Workshop</td> <td>Staff</td> </tr> <tr> <td>13/5/2016</td> <td>Boiler</td> <td>Staff</td> </tr> <tr> <td>5/3/2017</td> <td>Briefing on RSPO</td> <td>Mill Mgr</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Remarks	29/3/2017	IPM training	GPRC	GSPE	1/4/2017	Tractor	AM	6/2/2017	Spraying	Staff	6/2/2017	HIRARC	Staff	6/2/2017	Manuring	GPRC	13/2/2017	Harvesting	Staff	26/1/2017	PPE	Staff	20/2/2017	ERP (Fire)	AM	1/4/2017	EFB & PPE	Staff	3/3/2017	WTP	AM	5/4/2017	Recycle & RSPO	Staff	1/4/2017	Effluent Overflow Drill	ERT	GSOM	1/4/2017	Spillage Drill	ERT	1/4/2017	Fire Drill	ERT	13/3/2017	Laboratory	Staff	24/3/2017	Processing	Supervisor	7/11/2016	MPOB Grading	MPOB Officers	11/5/2016	Workshop	Staff	13/5/2016	Boiler	Staff	5/3/2017	Briefing on RSPO	Mill Mgr	Complied
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4.8.2 Records of training for each employee shall be maintained. - Minor compliance -	All the records of training for each employee were available at estate and mill office.	Complied																																																																		

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

**Criterion 5.1:**

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

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Criterion / Indicator	Assessment Findings	Compliance
<p>5.1.1</p> <p>An environmental impact assessment (EIA) shall be documented.                      - Major compliance -</p>	<p>Revised environmental aspect and impact register dated February 2017, refer to document GSPE/EAI 5.1. Environmental aspect was identified based on activities carried out in the estate. Main activities for upkeep and crop evacuation were identified such as herbicides spraying, manuring, harvesting, replanting etc.</p> <p>Based on site review at Bengkawat division facilities (chemical and fertilizer store, triple rinse area, generator set room and water treatment plant), all related environmental aspect were identified and incorporated in the register.</p> <p>As For GSOM, all pertinent environmental aspect and impact were covered. Routine, non-routine and emergency situation were identified and included in the document.</p> <p>For Sabah, under Environmental Impact Assessment Order 2005, Schedule 2 of the Environmental Protection (Prescribed Activities), EIA is required for the replanting project which is more than 500 hectares.</p> <p>Environmental Impact Assessment entitled, "Proposed Replanting of Oil Palm Plantation in Sabah Group of Estates at Genting Sabapalm Estate, Sandakan. The proposed replanting area involved of 1,154.71 ha which consist of 28% of the title area. The progressive replanting project started on 2009 until 2015 and some of the proposed plan was deferred until 2017. Until 2016, total of 863.34 ha has been replanted and the remaining area is 291.36 ha and yet to be completed.</p> <p>The existing environmental aspect was identified which related to:</p> <ul style="list-style-type: none"> <li>i) Physico-chemical environment: Meterology, topography and hydrology, geology, soil, existing water quality, existing air quality and noise level.</li> <li>ii) Ecological environmental: Flora and fauna</li> <li>iii) Social and economic environment: Human environment and land use</li> </ul>	<p>Complied</p>
<p>5.1.2</p> <p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.                      - Minor compliance -</p>	<p>EIA mitigation and and monitoring programme was developed based on EIA report CK/EV403-4102/09 dated December 2009. Among key environmental impacts identified were:</p> <ul style="list-style-type: none"> <li>i) Biomass and waste management</li> <li>ii) Water pollution</li> <li>iii) Occupational safety and health</li> <li>iv) Abandonment</li> </ul> <p>Mill and estate assistant has been appointed as the responsible person to monitor the management plan. In addition, external consultant will carry out the ECR as per required frequency by Environmental Protection Department.</p>	<p>Complied</p>

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<p>5.1.3</p> <p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p>	<p>Environmental monitoring has incorporated the environmental aspect identified in the EIA by EPD registered consultant, Chemsain Konsultant Sdn Bhd, EPD registration F001. Environment monitoring and compliance audit is to be carried out once in every 4 months and reported in accordance to the approval conditions as specified in the " Syarat- Syarat Alam Sekitar (Seksyen 12(5) dan 20, Enakmen Perlindungan Alam Sekitar 2002, ref: JPAS/PP/600-1/11/1/85 dated 17/3/10. Sample of ECR @ environmental compliance report checked:</p> <p>i) ECR for March 2016, ref# CKMO411/340(i)-1/16 dated 1/4/16.</p> <p>ii) 2<sup>nd</sup> ECR (ref# CK/MO411/340(i)-2/16 dated 29/7/16.</p> <p>iii) 3<sup>rd</sup> ECR, ref# CK/MO411/340(i)-3/16 dated 21/12/16.</p> <p>As part of ECR reporting, water quality monitoring (W1, W2 and W3) for surface water as per Interim NWQS under class III was carried for the last reporting period. Latest monitoring was done in 23/9/16, ref#CK/CI405/3482/16 dated 12/10/16. In addition, pesticides in water test was carried out in 23/9/16, Refer for report# CK/CL105/99343/16 dated 26/10/16. Pesticides residue in water for paraquat, glyphosate, aminomethylphosponic acid and methamidophos were not detected.</p>	<p>Complied</p>
<p><b>Criterion 5.2:</b> The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>		
<p>5.2.1</p> <p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>- Major compliance -</p>	<p>The HCV assessment conducted back in February- March 2010 by Dr Yap Son Kheong and a team of ecologist and biologist. Inventory of the sites using HCVF Toolkit for Malaysia within the Genting Plantations estates in Sabah to determine the presence of sites with high conservation attributes.</p>	<p>Complied</p>

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<p>5.2.2</p> <p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -</p>	<p>Based on the HCV assessment, below measures being implementing following section outlines some of the key threats that are known to exist within the landscape.</p> <p>HCV 1.4- two ponds in Bangkawat division (critical temporal use)</p> <p>i) No spraying or fertilizer application ii) No swimming or fishing iii)No poaching/ hunting iv)Replant indigenous species plant</p> <p>HCV 4.2- Riparian buffer zone at Sapi Div- Block 8, 7B and Bangkawat</p> <p>i) No spraying or fertilizer application ii) No swimming or fishing iii)No poaching/ hunting iv)Replant indigenous species plant</p> <p>HCV 6- Muslim &amp; Christian Cemetery</p> <p>i) Maintain the cleanliness of the area ii) Prohibiting the illegal activities.</p> <p>HCV assessment done by the Dr Yap Son Kheong indicated that only HCV 1.4, HCV 4.2 and HCV 6 (cemetery) with no RTE species presence. Total of 8.95 ha of HCV area identified within GSPE.</p>	<p>Complied</p>
<p>5.2.3</p> <p>There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -</p>	<p>Estates are doing HCV monitoring assessment based on recommendation of management plan. There is evidence to continuously prevent and discourage any illegal hunting, fishing or collecting activities via the signage erected.</p> <p>Besides that, management plan also include monitoring activities such signage, training, maintain buffer zone marking and maintaining vegetation at riparian zone every two months. All these activities were documented in HVC areas monitoring checklists.</p> <p>The latest management and monitoring for HCV areas within Genting Sabapalm Estate updated in April 2017</p>	<p>Complied</p>
<p>5.2.4</p> <p>Where a management plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> <li>• The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>• Outcomes of monitoring shall be fed back into the management plan.</li> </ul> <p>- Minor compliance -</p>	<p>Action plans, monitoring and continuous improvement programme were established and implemented accordingly at GSPE. All these activities were documented in HVC areas monitoring checklists and carried out once in every 2 months. The latest monitoring was done on 4/4/17 using the HCV monitoring checklist.</p> <p>The latest management and monitoring for HCV areas within Genting Sabapalm Estate updated in April 2017</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance									
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	Based on the assessment conducted by desktop, interview and field visits, it was verified that there has been no instance of HCV set aside that conflicts with cultural identify, basic needs for local communities and critical for water catchments at these estates.	Complied								
<b>Criterion 5.3:</b> Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.											
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Various aspects have been identified such as domestic waste, schedule waste & recyclable waste in the Waste Management Plans reviewed on 5 April 2017 for GSOM and GSPE. <table border="1" data-bbox="660 797 1299 1066"> <thead> <tr> <th>Source</th> <th>Management Plan</th> </tr> </thead> <tbody> <tr> <td>Schedule waste including Clinical waste</td> <td>Dispose through licensed contractor Complete spill kit Schedule waste store</td> </tr> <tr> <td>Domestic Waste</td> <td>Disposed at designated landfill</td> </tr> <tr> <td>Recyclable Waste</td> <td>Collection at least once a week</td> </tr> </tbody> </table>	Source	Management Plan	Schedule waste including Clinical waste	Dispose through licensed contractor Complete spill kit Schedule waste store	Domestic Waste	Disposed at designated landfill	Recyclable Waste	Collection at least once a week	Complied
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5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	Scheduled waste disposal was last done in November 2016 by DOE license contractor, Lagenda Bumimas Sdn Bhd. Disposal records @ 6 <sup>th</sup> schedule were checked and verified. 5 <sup>th</sup> copy of the 6 <sup>th</sup> schedule was kept as reference. Sample of consignment note checked dated 8/11/16: i) Consignment note #A017620 for SW102 – 38 kg ii) Consignment note #A017478 for SW410 – 44 kg iii) Consignment note #A017477 for SW305 – 297.5 kg iv) Consignment note #A017479 for SW409 – 151.5 kg  The recent disposal was done for SW404 (clinic waste) through Sedafiat Sdn Bhd dated 6/4/1 for total of 1.5 kg. Disposal record updated in the eSWIS and verified in April 2017 inventory summary report.  <u>GSOM</u> Disposal of scheduled waste was last done on 8/11/16 by license DOE contractor, Lagenda Bumimas. Records of disposal recrded using eSWIS checked: i) Consignment# 2016111808FPEA9W for SW102 – 0.1680 mt ii) Consignment# 201611807YI9C8P for SW305 – 0.055 mt iii) Consignment# 2016111709AML31D for SW410 – 0.03 mt iv) Consignment# 201611170857XFD9 for SW306 – 0.045 mt  The 5 <sup>th</sup> copy of the 6 <sup>th</sup> schedule was kept as reference. Waste received at the disposal facility on 15/11/16.	Complied								



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Criterion / Indicator		Assessment Findings	Compliance																					
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	<p>Waste management plan dated 5/4/17 was verified for GSPE. Management and disposal plan documented as per below table:</p> <table border="1"> <thead> <tr> <th>Source</th> <th>Management/Disposal Plan</th> </tr> </thead> <tbody> <tr> <td>Schedule waste including Clinical waste</td> <td>Dispose through licensed contractor Complete spill kit Schedule waste store</td> </tr> <tr> <td>Domestic Waste</td> <td>Disposed at designated landfill (Bengkawat Division field 84B) Waste collection schedule for once a week</td> </tr> <tr> <td>Recyclable Waste</td> <td>Collection at least once a week</td> </tr> </tbody> </table>	Source	Management/Disposal Plan	Schedule waste including Clinical waste	Dispose through licensed contractor Complete spill kit Schedule waste store	Domestic Waste	Disposed at designated landfill (Bengkawat Division field 84B) Waste collection schedule for once a week	Recyclable Waste	Collection at least once a week	Complied													
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<b>Criterion 5.4:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised.																								
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	<p>Renewable energy and direct fossil fuel use per tonne of Crude Palm Oil (CPO) or palm product has been monitored. Summary of energy usage as per below:</p> <p><u>GSPE</u></p> <table border="1"> <thead> <tr> <th>Year</th> <th>Consumption (mt/liter)</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>1.05</td> </tr> <tr> <td>2017 (to date)</td> <td>1.53</td> </tr> </tbody> </table> <p><u>GSOM</u></p> <table border="1"> <thead> <tr> <th>Year</th> <th>Diesel usage (liter)</th> <th>Total RE used (fibre &amp; shell) tonne</th> <th>Fossil fuel per tonne CPO</th> <th>RE per tonne CPO</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>280,868</td> <td>19,258.32</td> <td>11.28</td> <td>0.7735</td> </tr> <tr> <td>2017 todate</td> <td>84,324</td> <td>3,318.27</td> <td>21.85</td> <td>0.9326</td> </tr> </tbody> </table> <p>Continuous recording and monitoring is in practiced to ensure the fuel efficiency and renewable energy being fully utilized.</p>	Year	Consumption (mt/liter)	2016	1.05	2017 (to date)	1.53	Year	Diesel usage (liter)	Total RE used (fibre & shell) tonne	Fossil fuel per tonne CPO	RE per tonne CPO	2016	280,868	19,258.32	11.28	0.7735	2017 todate	84,324	3,318.27	21.85	0.9326	Complied
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<b>Criterion 5.5:</b> Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.																								
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	No burning policy is available and signed by (President & Chief Operating Officer) dated 10 Aug 2011 and no evidence of open burning was observed during onsite visit to the line site as well as the areas surrounding the office.	Complied																					

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5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	No use of fire for land preparation during replanting. Only mechanical machine will be used for felling and land preparation.	Complied
<b>Criterion 5.6:</b> Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	Boiler stack sampling was carried as per requirements under GSOM compliance schedule.  <u>2016 monitoring</u>  Boiler no.1: 0.226 g/Nm3 corrected to 12% CO2. Refer to report by Chemsain Konsultant Sdn Bhd, ref# CK/MO407/878-1/16 ( 1 <sup>st</sup> half 2016)  2 <sup>nd</sup> half 2016: 0.037 g/Nm3 corrected to 12% CO2. Ref# CK/MO407/878-2/16.  <u>2017 monitoring</u>  Boiler no.1: 0.285 g/Nm3 corrected to 12% CO2. Refer to report by Multi-Serve Enterprise, ref#MS/GSOM/2017/BOILER NO.1 (S1) – 1 <sup>st</sup> half	Complied
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	For the estate, GHG emissions identified including COx, SOx and NOx from various sources including fossil fuel, chemical, peat oxidation, sinks, crop sequestration, fertilizer consumptions and sequestration in conservation area.  For mill, GHG emission identified from POME, fuel consumption and grid electricity utilization.  Significant pollutants and greenhouse gas (GHG) emission-reduction/ minimization plan for year 2017 dated 16 Jan 2017 has been implemented to minimize the emission of GHG from diesel used, material used and POME. Management plan such as reduce diesel consumption and control fuel feeding.	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 is used and the management opted for full version was applied. The report prepared on 6 April 2017.  These GHG calculations were done as per certification unit basics including 1 estate and mill. Summary emissions:  a. Emission/ mt CPO= 3.48 tCO2 e/mt CPO  b. Emission/ mt PK= 3.48 tCO2 e/mt PK	Complied

**Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.**

**Criterion 6.1:**

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

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Criterion / Indicator	Assessment Findings	Compliance
6.1.1 A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	SIA was conducted for mill, GSPE estates on 6 <sup>th</sup> – 8 <sup>th</sup> April 2017 by Sustainability Department. Sampling stakeholders were selected for interview such as local and foreign workers’ representatives, women committee representatives, contractors and smallholders.	Complied
6.1.2 There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	SIA was conducted with the participation of selected stakeholders. The participation of both internal and external stakeholders which was evident with the list of participants recorded in the attendance list and pictures. In the SIA report, the stakeholders have raised issues during the meeting as below:  a) Estate AP to carry out road block regularly to educate the workers and villagers on the road safety b) Mill to conduct re-awareness training on the FFB grading to the smallholders  Interviewed with the contractor and local communities confirmed that they had attended the stakeholder meeting.	Complied
6.1.3 Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	The estate has generated a Social Management and Monitoring Plan which updated on 1/4/2017 by the mill engineer. The plan developed has incorporated the status, benchmark, monitoring technique and person to be responsible for the issue.  However, the plan has not incorporated the issues or impact identified from the consultation with the affected stakeholders. The existing plan only recorded plan such as updating list of stakeholder, organize stakeholder meeting and etc.	Major nonconformance
6.1.4 The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The plan was reviewed on yearly basis. Last reviewed on 1 April 2017. However, the management plan is not comprehensive and please refer to major 6.1.3.	Complied
6.1.5 Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	Not applicable as there is no scheme smallholders involved in the operating units.	Not applicable
<b>Criterion 6.2:</b> There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.		

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Criterion / Indicator	Assessment Findings	Compliance
6.2.1 Consultation and communication procedures shall be documented. - Major compliance -	GSPE and GSOM have implemented procedure on Consultation and Communication with doc. No. SMP-GPB-17 dated 11/10/2013. The procedure is for the internal and external communication of sustainability requirements and responding to communications from interested parties. Topics or issues shall be discussed as below: a) Relationship with company b) Opportunities for employment c) Land issues d) Pay, condition, facilities, safety and training e) And etc. All the issues and grievances will be handled by manager otherwise will be forwarded to Head Office if serious incidents beyond capability of manager.	Complied
6.2.2 A management official responsible for these issues shall be nominated. - Minor compliance -	A social and risk management officer has been appointed as Management Representative for ISCC, RSPO and MSPO related matters for estate and mill. An organizational chart of sustainability team sighted in the estate office.  In mill, the mill manager has been appointed as Sustainability Coordinator on 01 September 2016.	Complied
6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	The mill and estate has developed Internal and External Stakeholders Lists. The lists were included government bodies, FFB suppliers, contractors, workers' representatives and etc. The lists were separated by internal and external and last updated on March 2017.  Stakeholder's meeting for internal and external was conducted on 16/3/2017 and 11/3/2017 respectively. Internal stakeholder meeting was conducted together with mill and estate. Meeting minutes were sighted and documented.  Meeting minutes which recorded all the issues raised up by stakeholders, action and person in charge. However, no records of actions taken in response to input from stakeholders For example, a. Internal stakeholder meeting dated 16 March 2017- Repairing of drain in the canteen; fencing of the sundry shop for safety purpose b. External stakeholder meeting dated 11 March 2017- overlap of the land of estate and the smallholders	Minor nonconformance

**Criterion 6.3:**  
There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.

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Criterion / Indicator	Assessment Findings	Compliance
<p>6.3.1</p> <p>The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -</p>	<p>GSPE and GSOM have implemented procedure on Complaints and Grievance with doc. No. SMP-GPB-19 dated 5/9/2014. The procedure is to provide guidelines on handling complaints and grievances as below:</p> <ul style="list-style-type: none"> <li>a) Complaints and grievances extended to estate/mill management by workers and internal &amp; external stakeholders</li> <li>b) Complaints and grievances by stakeholders (including workers) extended to Head Office</li> <li>c) Complaints &amp; grievances arise due to NCR land issue and at new development/ new planting areas and etc.</li> </ul> <p>The time frame to acknowledge and respond to complaints or grievances is within 14 working days upon receipt.</p> <p>Complaints form and box also sighted outside the office. Complaints/grievances book keep inside the office.</p>	<p>Complied</p>
<p>6.3.2</p> <p>Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –</p>	<p>GSPE and GSOM have implemented Complaints/ Grievances Record Book for the stakeholders to lodge any complaints or grievances. Issues and actions taken have been recorded in the record book. All the issues were resolved.</p> <p>For example, an issue regarding broken ceiling has been recorded on 1 April and it was fixed on 2 April 2017.</p>	<p>Complied</p>
<p><b>Criterion 6.4:</b> Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>		
<p>6.4.1</p> <p>A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -</p>	<p>GSPE &amp; GSOM has established procedure on negotiation, compensations and handling with doc. No. SMP-GPB-18 dated 5/9/2014. The objective of the procedure is to provide guidelines on handling issues as follow:</p> <ul style="list-style-type: none"> <li>a) Land/ Boundary dispute including NCR related land conflict</li> <li>b) Squatter issue</li> <li>c) Social issue</li> </ul> <p>Negotiation will be carried out between estate management and the stakeholders. If it fails, then will consulted Legal Department and etc in Head Office. Any compensation claims will be decided by the HO top management bases on case basis and current value. If negotiation and compensation fails, HQ top management will proceed with legal action against the affected party.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	SOP same as above criteria 6.4.1.  Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.  Complied
<b>Criterion 6.5:</b> Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.		
6.5.1	Documentation of pay and conditions shall be available. - Major compliance -	Mill has employed local and foreign workers. All the workers are under direct employment. Sampled payslip from Aug & Dec 2016 and Feb 2017:  a) Employee No.: E10718 b) Employee No.: E10370 c) Employee No.: E00086 d) Employee No.: E00147 e) Employee No.: E00926 f) Employee No.: E00078 g) Employee No.: E10104 h) Employee No.: E10345 i) Employee No.: E00100 j) Employee No.: E00049 k) Employee No.: E00207 l) Employee No.: E00146  All the sampled workers were achieved the minimum wage accordance to Minimum Wage Order 2016 for July which achieved RM 920/ month.  The mill management has applied from Jabatan Tenaga Kerja (JTK) Sabah to: a. Extend the maximum overtime per month to 130 hours. b. Women work at night c. Pay deduction for levy, recreation fee, phone and etc.  All documents are submitted on 20 March 2017 and pending approval from JTK.

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Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.2</p> <p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p>	<p>Employment contract are available in language that understood by workers. The contract has detailing the payments and employment conditions such as period of working, working hour, medical assistance, housing, holiday and annual leave, period of notice and etc. Extension contract for the workers who worked more than 3 years were sampled as below:</p> <ul style="list-style-type: none"> <li>a) Employee No.: E10104 valid until 25/10/2017</li> <li>b) Employee No.: E00926 valid until 16/10/2017</li> <li>c) Employee No.: E00086 valid until 25/10/2017</li> <li>d) Employee No.: E10718 valid until 25/10/2017</li> <li>e) Employee No.: E10502 valid until 09/01/2018</li> <li>f) Employee No.: E00078 valid until 30/10/2017</li> <li>g) Employee No.: E00100 valid until 08/08/2019</li> <li>h) Employee No.: E00049 valid until 08/08/2019</li> <li>i) Employee No.: E00207 valid until 08/08/2019</li> <li>j) Employee No.: E00146 valid until 08/08/2019</li> </ul> <p>In GSPE, the extension contract stated that all the terms were according to the initial contract of employment signed. However the initial contract already obsolete due to the establishment of new contract template (rev: 2; date 01/08/2016). The new contract has different terms such as minimum wages. All existing workers in estate did not sign the new contract even though a training has been conducted to explain on the new contract terms and conditions on 29 March 2017.</p> <p>Induction training was conducted for new recruited workers. Evidence of training materials and attendant lists were sighted.</p>	<p>Major noncompliance</p>
<p>6.5.3</p> <p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p>- Minor compliance –</p>	<p>The mill and estates have provided housing facilities to the workers. New houses has been built to replace the existitng wooden house. They also supplied water tanks for the workers to store water. Water was treated in the mill treatment plant and found is clean. Interviewed with the housewives and workers found out that water and electricity was provide without charges. Clinic is located in the estate compound to provide medical facilities to all the workers. HUMANA school was also found in the estate. Crèche is provided in the mill and estate for the kids.</p>	<p>Complied</p>
<p>6.5.4</p> <p>Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p>	<p>Sundry shops and canteens were located in the estate. The goods and foods price list was displayed at the shop. Workers to Telupid and Sandakan town once a month to purchase goods and foods.</p>	<p>Complied</p>
<p><b>Criterion 6.6:</b> The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>		



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Criterion / Indicator	Assessment Findings	Compliance
6.6.1 A published statement in local languages recognising freedom of association shall be available. - Major compliance -	GSPE and GSOM have implemented a People Policy dated 3/8/2009 signed by Chief Operating Officer where the workforces have the rights, freedom of association and equal opportunities. The policy was displayed at the notice board outside the office. Briefing on all the policies was conducted from 03-05 April 2017. Attendant list and training material is sighted.	Complied
6.6.2 Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	No union form in Sabapalm estate and oil mill. However, internal meeting social and welfare of workers issue is in practice. Meeting minutes of Genting Sabapalm Oil Estate of year 2017 conducted on 12 January 2017. However, no major issue being raised in the meeting.  At oil mill, the meeting conducted on 21 March 2017 with the attendance from previous representative. Documented meeting minutes sighted during onsite visit.	Complied
<b>Criterion 6.7:</b> Children are not employed or exploited.		
6.7.1 There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Reviewed inspection of employee contract agreement and list of registration confirmed that those employed are as per company policy on minimum age. The minimum working age is 18 and above. During field visit and consultation with stakeholders confirm that there is no child labour at any of the operation sites.	Complied
<b>Criterion 6.8:</b> Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.		
6.8.1 A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	GSPE and GSOM have implemented a People Policy dated 3/8/2009 and Social Policy (Incorporating the Labour and Human Rights requirements) dated 22/6/2015 where the workforces have the rights, freedom of association and equal opportunities.  No discrimination in terms of hiring, compensation and etc is practice by the management. The policy was displayed at the notice board outside the office. Briefing on all the policies was conducted from 03-05 April 2017 (estate) and 05 March 2017 (mill). Attendant list and training material is sighted.	Complied
6.8.2 Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Through document reviewed of active employee list found that the management has recruited local and foreign workers which consisted of male and female workers. Total 361 foreign workers and 52 local workers. Female workers consisted of 122 persons whereas 291 persons are male workers as at 1 April 2017.	Complied
6.8.3 It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	Recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. It was noted during the audit that there is no discrimination based on nationality, race, gender, age, etc.	Complied
<b>Criterion 6.9:</b> There is no harassment or abuse in the work place, and reproductive rights are protected.		



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Criterion / Indicator	Assessment Findings	Compliance
6.9.1	<p>Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce.</p> <p>- Major compliance -</p>	<p>GSPE and GSOM have implemented a Sexual Harassment Policy dated 3/8/2009 signed by Chief Operating Officer. The policy was displayed at the notice board outside the office. Briefing on all the policies was conducted from 03-05 April 2017 (estate) and 05 March 2017 (mill). Attendant list and training material is sighted.</p>
6.9.2	<p>A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.</p> <p>- Major compliance -</p>	<p>GSPE &amp; GSOM have implemented a Social Policy (Incorporating the Labour and Human Rights requirements) dated 22/6/2015. In the policy statement, it mentioned that reproductive rights are protected.</p> <p>The policy was displayed at the notice board outside the office. Briefing on all the policies was conducted from 03-05 April 2017 (estate) and 05 March 2017 (mill). Attendant list and training material is sighted.</p> <p>Through interviewed with female workers concluded that no cases of reproductive reported thus far.</p>
6.9.3	<p>A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>GSPE has established a Women's Committee and appointment letters were issued by manager to the committee. In GSPE &amp; GSPM, last meeting was conducted on 14 Jan 2017 and 13 March 2017 respectively. Documented meeting minutes made available during site visit.</p> <p>Through interviewed with chairman and female workers concluded that no sexual harassment cases reported thus far. They well aware of the complaint procedures.</p>
<p><b>Criterion 6.10:</b> Growers and mills deal fairly and transparently with smallholders and other local businesses.</p>		
6.10.1	<p>Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.</p> <p>- Minor compliance -</p>	<p>Inspection to the weighbridge office, the FFB pricing offer to the smallholders are displayed at the weighbridge station. The pricing are updated from time to time.</p>
6.10.2	<p>Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation).</p> <p>- Major compliance -</p>	<p>There is no evidence that the mill have explained FFB pricing, and pricing mechanisms for FFB and inputs/services. Only new FFB supplier questionnaire (PM-MKT-04-F01-0) use for smallholder during application.</p>
6.10.3	<p>Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p>- Minor compliance -</p>	<p>The contractors have signed on contractor's agreement with the management. Below are the sampled contract agreements:</p> <ul style="list-style-type: none"> <li>a) Agreement No.: GSOM/00/G16120001 dated 1 Dec 2016</li> <li>b) Agreement No.: GSOM/00/G16110001 dated 31 Dec 2016</li> </ul> <p>The contractors have signed on each page of the agreement.</p>

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Criterion / Indicator		Assessment Findings	Compliance
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	According to the contract agreement, the company shall pay to the contractors within 30 days from the date of issuance of Schedule of Work Completed. Payments records:  a) Agreement No.: GSOM/OO/G16120001 dated 31 Dec 2016; paid on 17 Jan 2017  b) Agreement No.: GSOM/OO/G16110001 dated 2 Dec 2016; paid on 16 Dec 2016.  Payment records were sighted.	Complied
<b>Criterion 6.11:</b> Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	Following records of contributions to local development sighted during onsite visit:  a. Contribution of Humana Child Society Sabah through donation or provide hall and sound system to school event.  b. Providing chair for funeral dated 06 April 2017  c. Contribution of paint to police station dated 11 March 2017  d. Boat shuttling service provided for Sabapalm & nearby villagers’ children who are schooling in SMK Pamol located at other side of Labuk River.  e. Credit system for smallholder on the fertilizer application  f. Supplied potable water to Kg Lumantik for the Wedding dinner of the villager  g. Providing training to the smallholders regarding the best practices under RSPO management system on 2 Feb 2017.  All of these are sighted in the budget 2017 or communication record.	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	No schemes smallholder. Only independent smallholders and out-growers.  However, GSOM took initiatives in providing training to the smallholders regarding the best practices under RSPO management system on 2 Feb 2017.	Complied
<b>Criterion 6.12:</b> No forms of forced or trafficked labour are used.			

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Criterion / Indicator		Assessment Findings	Compliance
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	GSPE & GSOM have implemented a Social Policy (Incorporating the Labour and Human Rights requirements) dated 22/6/2015. The policy was displayed at the notice board outside the office. Briefing on all the policies was conducted from 03-05 April 2017. Attendant list and training material is sighted.  In the policy statement, the management has committed not to use any forced labour or trafficked labour. The workers had signed on the contract of employment where it stated that the passport will be retained by the employer for safety reason.  Besides, interviewed the workers also confirmed there is no evidence of forced or trafficked labour are used.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	No evidence of contract of substitution detected in the samples. Interviewed the labour agency and confirmed that the same contract used in foreign country and Malaysia.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	People policy and Social policy is implemented. No temporary workers. Migrant workers are treated equally as per the locals.	Complied
<b>Criterion 6.13:</b> Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	GSPE & GSOM have implemented a Social Policy (Incorporating the Labour and Human Rights requirements) dated 22/6/2015. They are respected and supported the Universal Declaration of Human Rights.  Briefing on all the policies was conducted from 03-05 April 2017. Attendant list and training material is sighted.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	There is a HUMANA school in the estates' compound. Parents do not need to pay any school fee. The mill and estates had donated RM840 to the school (record dated 24 October 2016), provide the hall and sound system for the school event. Total 102 students from GSPE and GSOM. Upon request by HUMANA teacher, the management has provided maintenance such as repairing and also disposal of waste. There was budget allocated for HUMANA maintenance and fees sighted in Budget 2017.	Complied
<b>Principle 7: Responsible development of new plantings</b> Genting Sabapalm Oil Mill Certification unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance. The immature areas are replanted area. It was also confirm through the land statement and the land title.			
<b>Principle 8: Commitment to continual improvement in key areas of activity</b>			
<b>Criterion 8.1:</b> Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			

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Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of pesticides(Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);               <ul style="list-style-type: none"> <li>• Optimising the yield of the supply base.</li> </ul> </li> </ul> <p>- Major compliance -</p>	<p>To assist smallholders to purchase quality fertilizers on credit terms, payment will be through deduction from the total income for the sales of the FFB.</p> <p>Boat shuttling service provided for Sabapalm &amp; nearby villagers’ children who are schooling in SMK Pamol located at oter side of Labuk Reiver. A hired school</p> <p>Estate clinic providing health care treatment for nearby villagers &amp; stakeholders</p> <p>CAPEX allocation for mill</p> <p>i) ETP desludging for (anaerobic and aerobic pond) For 2016, desludging aerobic part of the ETP (facultative 1) was completed. This to improve the HRT (hydraulic retention time) for the ETP.</p>	<p>Complied</p>

**Appendix B: Approved Time Bound Plan**

No	Name of the Estate and Mills	TBP for certification	Status as Jan 2017	Any unresolved (Labour Disputes/Land conflicts/Legal Non-Compliance etc.)	
1	Genting Sri Gading Estate, Johor, Malaysia	Supply base for Genting Ayer Item Oil Mill, Johor, Malaysia	Dec,2014	Certified	None
2	Genting Sungei Rayat Estate, Johor, Malaysia		Dec, 2014		
3	Genting Kulai Besar Estate, Johor, Malaysia		Dec,2014		
4	Genting Tanah Merah Estate, Johor, Malaysia		Dec,2015		
5	Genting Tebong Estate, Melaka, Malaysia		July, 2015		
6	Genting Selama Estate, Kedah, Malaysia		July,2015	Certified	None
7	Genting Sabapalm Estate, Sabah, Malaysia	Supply base for Genting Sabapalm Oil Mill, Sabah, Malaysia	Aug,2015	Certified	None
8	Genting Tanjung Estate, Sabah, Malaysia	Supply base for Genting Tanjung Oil Mill, Sabah, Malaysia	Aug,2016	Certified	None
9	Genting Tenegang Estate, Sabah, Malaysia		Aug,2016		
10	Genting Layang Estate, Sabah, Malaysia		Aug,2016		
11	Genting Bahagia Estate, Sabah, Malaysia		Aug,2016		
12	Genting Landworthy Estate, Sabah, Malaysia		Aug,2016		
13	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah Oil Mill, Sabah, Malaysia	April 2018		None
14	Genting Permai Estate, Sabah, Malaysia		April 2018		
15	Genting Kencana Estate, Sabah, Malaysia		April 2018		
16	Genting Jambongan Estate, Sabah, Malaysia	Supply base for Genting Jambongan Oil Mill, Sabah, Malaysia	Oct, 2017		None
17	Genting Sekong Estate, Sabah, Malaysia	Supply base for Genting Trushidup	Aug,2017		None

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18	Genting Suan Lamba Estate, Sabah, Malaysia	Oil Mill, Sabah, Malaysia	Aug, 2017		
19	Mulia Estate 1, Kalimantan, Indonesia	Supply base for Mulia Oil Mill, Kalimantan, Indonesia	Oct, 2017	Stage 1 Sept 2016	None
20	Mulia Estate 2, Kalimantan, Indonesia		Oct, 2017	Stage 1 Sept 2016	None
21	Mulia Estate 3, Kalimantan, Indonesia		Oct, 2017	Stage 1 Sept 2016	None
22	Mulia Estate 4, Kalimantan, Indonesia		Oct, 2017	Stage 1 Sept 2016	None
23	Mulia Estate 5, Kalimantan, Indonesia		Oct, 2017	Stage 1 Sept 2016	None
24	Mulia Estate 6, Kalimantan, Indonesia		Oct, 2017	Stage 1 Sept 2016	None
25	PT SMA Estate 1		Oct, 2017	Stage 1 Sept 2016	None
26	PT SMA Estate 2		Oct, 2017	Stage 1 Sept 2016	None
27	PT SMA Estate 3		Oct, 2017	Stage 1 Sept 2016	None
28	PT SMA Estate 4		Oct, 2017	Stage 1 Sept 2016	None
29	Genting Mewah Estate, Sabah, Malaysia	Supply base for Genting Mewah Oil Mill, Sabah, Malaysia	Mar, 2017	Audited	None
30	Genting Lokan Estate, Sabah, Malaysia		Mar, 2017		None
31	Genting Cheng Estate, Melaka, Malaysia		Jan, 2018		None
32	Genting Bukit Sembilan Estate, Kedah, Malaysia		July, 2017		None
33	Lamunti Barat Estate	Supply base for PT GAL Oil Mill, Kalimantan, Indonesia	Oct, 2018		None
34	Lamunti Timur Estate I/II		Oct 2018		None
35	Mengkatip Estate I/II		Oct, 2018		None
36	Bakuta Estate		Oct, 2018		None
37	Plasma Timur/Barat		Oct, 2018		None
38	PT UAI 1/2		Oct, 2020		None
39	Golden Hill Estate I	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia	Oct 2019		None
40	Golden Hill Estate II		Oct 2019		None
41	SP1		Oct 2019		None
42	SP2		Oct 2019		None
43	Diamond Hill Estate	Supply base for KMJ Oil Mill*	Oct, 2019		None
44	Puroh Estate		Oct, 2019		None

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45	Masaha Estate		Oct,2019		None
46	PT CSC	Supply base for CSC Oil Mill*	Oct,2020		None
46	PT SAP Estate 1	Supply base for PT SAP Oil Mill*	Oct, 2019		None
47	PT SAP Estate 2		Oct,2019		None
48	PT SAP Estate 3		Oct,2019		None
49	PT SAP Estate 4		Oct,2019		None
50	PT SAP Estate 5		Oct,2019		None
51	PT SAP Estate 6		Oct,2019		None
53	PT AAC 1, 2,3,4		Oct,2019		None
52	PT PALJ	Supply base for PALJ Oil Mill*	Aug,2023		None

\*mill yet to be constructed

**Appendix C: Certification Unit RSPO Certificate Details**

Genting Plantations Berhad  
Genting Sabapalm Oil Mill  
KM 25, Down Sg. Labuk  
Mukim Tagas-Tagas 90000 Beluran  
Sandakan, Sabah  
RSPO membership number: 1-0086-06-000-00

BSI RSPO Certificate No. : RSPO 653477  
Date of Initial Certificate Issued: 09/06/2016  
Date of Expiry: 08/06/2021  
Applicable Standards: RSPO P&C MYNI-2014; RSPO Supply Chain Certification Standard November 2014 Module E – CPO Mills: Mass Balance)

<b>Genting Sabapalm Oil Mill and Supply Base</b>					
Location Address	KM 25, Down Sg. Labuk, Mukim Tagas-Tagas 90000 Beluran, Sandakan, Sabah, Malaysia				
GPS Location	117° 22' 26.8" E ; 5° 57' 54.3" N				
CPO Tonnage Total	20,608.10				
PK Tonnage Total	3,896.70				
CPO Claimed for Certification*	20,608.10				
PK Claimed for Certification *	3,896.70				
Own estates FFB Tonnage	93,000.00				
Scheme Smallholder FFB Tonnage	-				
Estates	Production Area		Other use (ha)	Certified Area / Total land lease (ha)	Annual FFB Production (mt)
	Mature (ha)	Immature (ha)			
Genting Sabapalm Estate	3,636.72	271.48	450.38	4,358.58	93,000.00



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**Appendix D: Assessment Plan**

Date	Time	Subjects	Hoo BH	Hidhir	Hafiz
Monday 10/04/2017	AM	Audit team traveling to site	√	√	√
	PM	Stakeholder consultation	√	√	√
Tuesday 11/04/2017  <b>Genting Sabapalm Estate</b>	0830 - 0900	Opening Meeting <ul style="list-style-type: none"> <li>• Opening presentation by Audit Team Leader</li> <li>• Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation)</li> </ul>	√	√	√
	0900 - 1200	<b>Genting Sabapalm Estate</b> Field visit, boundary inspection, field oprations, staff & workers intervie, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, schedule waste management, worker housing, clinic, landfill, etc	√	√	√
	1100 - 1200	<b>Meeting with stakeholders</b> (village rep, smallholders, Union Leader, contractor etc)	√	-	-
	1200 - 1300	Lunch	√	√	√
	1300 - 1630	<b>Genting Sabapalm Estate</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, TBP, CIP and implementation etc).	√	√	√
	1630 -1700	Interim Closing briefing	√	√	√
	Wednesday 12/04/2017  <b>Genting Sabapalm Oil Mill</b>	0900 - 1100	<b>Genting Sabapalm Oil Mill</b> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√
1100 -1200		Supply chain for CPO mill, weighbridge officer, production record and etc	√	√	√
1200-1300		Lunch	√	√	√
1300 - 1630		<b>Genting Sabapalm Oil Mill</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
1630 - 1700		Closing briefing	√	√	√

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Date	Time	Subjects	Hoo BH	Hidhir	Hafiz
Thursday 13/04/2017	AM	Audit team traveling back to KL	√	√	√
<b>Major CAR Closure Visit</b>					
Tuesday 23/05/2017 <b>Genting Sabapalm Estate and Oil Mill</b>	AM	Major CAR Closure site Verification	√		

**Appendix E: Stakeholders Contacted**

**Internal Stakeholders**

Managers Assistant Managers Staffs Hospital Assistants Women & Children Committee's representatives Workers' representatives	Contractors Humana School Teacher Creache teacher Clinic
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**External Stakeholders**

<b>Workers Recruiter</b> Agensi Pekerjaan MNK	<b>Local Communities</b> Village Tembidong-bidong
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**Appendix F: CPO Mill Supply Chain Assessment Report (Module E : Mas Balance)**

Requirements	Compliance
<b>E.1 Definition</b>	
<p>E.1.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Sabapalm Palm Oil Mill receives and process both certified and non-certified FFB and mostly from the independent smallholders. Therefore, it uses the Mass Balance supply chain system and module. During the P&amp;C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p>
<b>E.2 Explanation</b>	
<p>E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&amp;C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>
<p>E.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>Based on recorded transaction for license period of 9/6/16 to 8/6/17, contract no. SSD/116/S01PK dated 28/10/16 was not recorded. Physical delivery started in November 2016 and completed in January 2017 for total of 359. 77 mt. Thus, a major non-compliance was issued.</p>
<b>E.3 Documented procedures</b>	
<p>E.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</p>	<p>Latest written documented procedures, Supply Chain, Traceability and mass balance, SMP-GMB-23, rev:04 dated 21/11/14 for the chain of custody is with mass balance (MB) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB. This developed based on the RSPO SCCS 21 November 2014.</p> <p>The mill manager and assistant manager have awareness of the supply chain system. The manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p>

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<p>E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>Sabapalm Palm Oil mill has documented procedures (as per above in E 3.1) for the incoming FFB, processing and outgoing palm products (CPO and PK). The procedure covers receiving and processing certified and non-certified FFBs.</p>
<p><b>E.4 Purchasing and goods in</b></p>	
<p>E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.</p>	<p>Daily records are prepared at the entry point at the weighbridge. Weighbridge ticket stamped with ID for certified supplier, i.e for Sabapalm Estate ( RSPO certified supplier) . Daily summary and monthly summary documented for all the certified and non-certified FFB. Records verified by internal and external audit.</p>
<p>E.4.2 The site shall inform the CB immediately if there is a projected overproduction.</p>	<p>The facilities aware of this procedure.</p>
<p><b>E.5 Record keeping</b></p>	
<p>E.5.1 a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</p> <p>(b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)</p>	<p>All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. Computerized system in place. No PKO and Palm kernel meal at Sabapalm Palm Oil mill. PK is sold to 3<sup>rd</sup> party Kernel Crushing Plant (KCP).</p> <p>CPO sold under other sustainability standard. No evidence of double counting noted. All transactions will be recorded under mass balance accounting sheet.</p> <p>Sample of PK contract: October 2016 – 3<sup>rd</sup> party refinery plant dated 28/10/16 Delivery month : November/December 2016 Commodity : RSPO MB palm kernel Contract number: SSD/1116/S01PK, Quantity 350 mt.</p> <p>Sample of physical delivery: i) Date: 1/12/16, Lorry: SS1333U, WB ticket#PK16000151W, weight; 25.30 mt. ID stamped: RSPO certified- PK/MB ii) Date: 5/12/16, Lorry: SS1333U, WB ticket#PK16000153W, weight; 26.30 mt. ID stamped: RSPO certified- PK/MB iii) Date : 6/12/16, Lorry: SS1333U, WB ticket#PK16000154W, weight; 23.40 mt. ID stamped: RSPO certified- PK/MB</p> <p>Daily summary and monthly summary documented for all the FFB received. Records of certified FFB received verified during annual surveillance. Records verified by internal and external audit.</p> <p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the FFB received. Records of certified FFB received verified during annual surveillance. Records verified by internal and external audit.</p>
<p>E.5.2 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement</p>	<p>No outsourcing activities. PK sold to 3<sup>rd</sup> party KCP for further process.</p>

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**Actual Certified Palm Production – 01 Jan 2016 – 31 Dec 2016 (ASA1)**

Mill	Processing Capacity	CPO	PK
Genting Sabapalm Oil Mill	20mt	18,520.40	3,572.62

**Actual Sales of Certified Palm Products – 01 Jan 2016 – 31 Dec 2016 (ASA1)**

Mill	Certified CPO Sales	Certified PK Sales	Remarks
Genting Sabapalm Oil Mill	15,154	1,971	N.A

Month	Certified Supply Base (from own certificate scope) (mt)	Total FFB/Month (mt)
	Estate (GSPE)	
Jan 2016	4,884.21	4,884.21
Feb 2016	3,841.23	3,841.23
Mar 2016	4,292.78	4,292.78
Apr 2016	4,794.63	4,794.63
May 2016	6,195.61	6,195.61
Jun 2016	7,845.33	7,845.33
July 2016	9,906.20	9,906.20
Aug 2016	8,459.41	8,459.41
Sep 2016	10,773.31	10,773.31
Oct 2016	8,856.63	8,856.63
Nov 2016	7,933.99	7,933.99
Dec 2016	7,203.97	7,203.97
<b>Total</b>	<b>84,987.30</b>	<b>84,987.30</b>

**Appendix G: GHG Reporting Executive Summary**

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

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

The summary of the Net GHG emitted in 2016 for Genting Sabapalm Oil Mill mill and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	3.48
PKO	3.48

Extraction	%
OER	21.8
KER	4.21

Production	t/yr
FFB Process	84,987.31
CPO Produced	18,520.40
PKO Produced	3,572.63

Land Use	Ha
OP Planted Area	3,908.20
OP Planted on peat	1,336.39
Conservation (forested)	0
Conservation (non-forested)	8.95
<b>Total</b>	<b>3,917.15</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	36,046.73	0.42	0	0	0	0	36,046.73	0.42
CO <sub>2</sub> Emission from fertilizer	4,103.84	0.05	0	0	0	0	4,103.84	0.05
NO <sub>2</sub> Emmision	14,057.56	0.17	0	0	0	0	14,057.56	0.17
Fuel Consumption	278.02	0	0	0	0	0	278.02	0
Peat Oxidation	72,967.99	0.86	0	0	0	0	72,967.99	0.86
<b>Sink</b>								
Crop Sequestration	-33,876.93	-0.4	0	0	0	0	-33,876.93	-0.4
Conservation Sequestration	0	0	0	0	0	0	0	0
<b>Total</b>	<b>93,577.21</b>	<b>1.1</b>	<b>0</b>	<b>0</b>	<b>3,216.51</b>	<b>0</b>	<b>93,577.21</b>	<b>1.1</b>

**Summary of Mill Emission and Credit**

	tCO <sub>2e</sub>	tCO <sub>2e</sub> /tFFB
<b>Emission</b>		
POME	7,331.26	0.06
Fuel Consumption	876.31	0.01
Grid Electricity Utilisation	0	0
<b>Credit</b>		
Export of Grid Electricity	-1,567.83	-0.01
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>6,639.74</b>	<b>0.06</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

<b>Emissions</b>	<b>tCO<sub>2e</sub></b>
PK from own mill	16,731.29
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

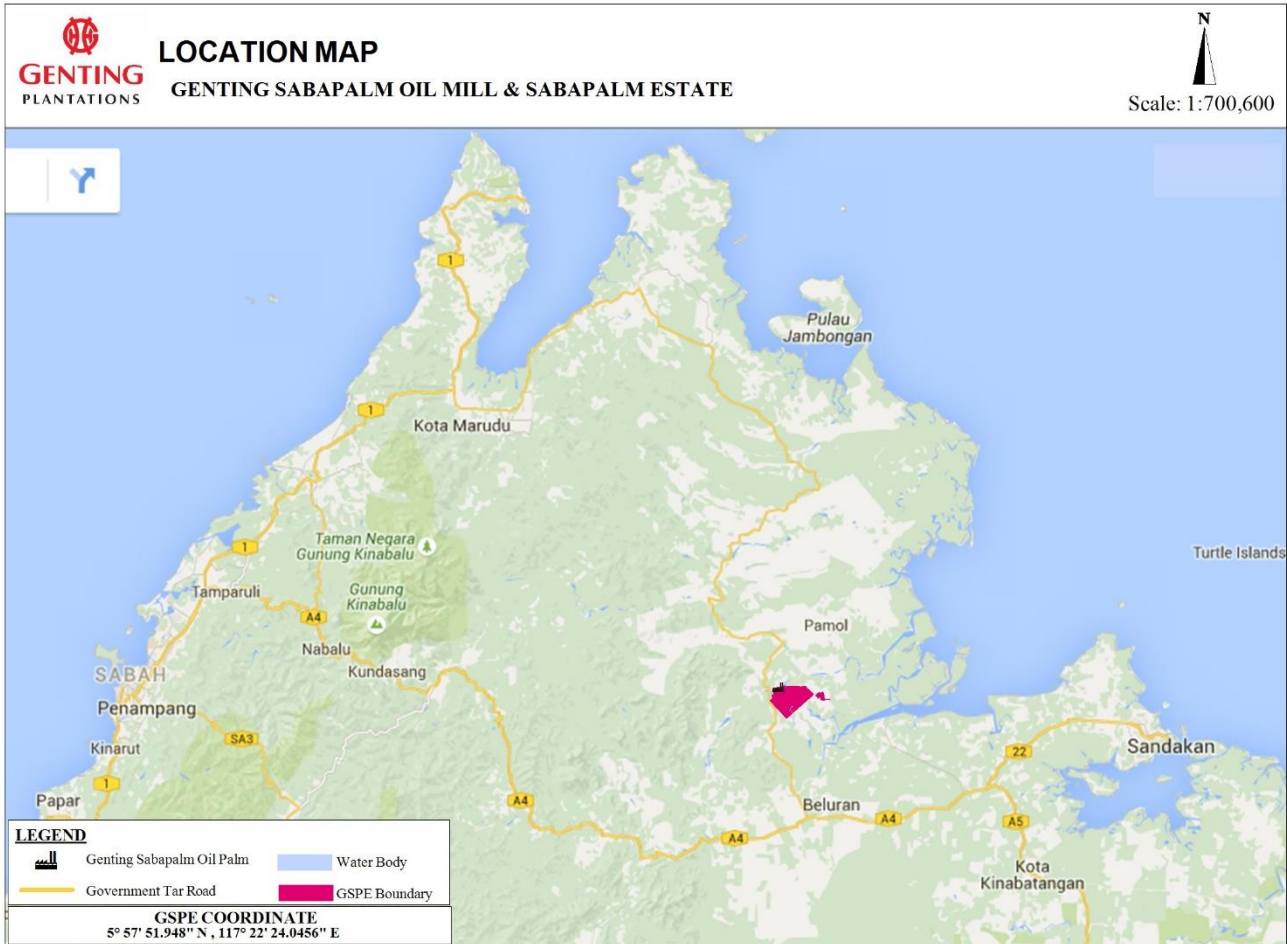
\*This mill has no kernel crusher operation.

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

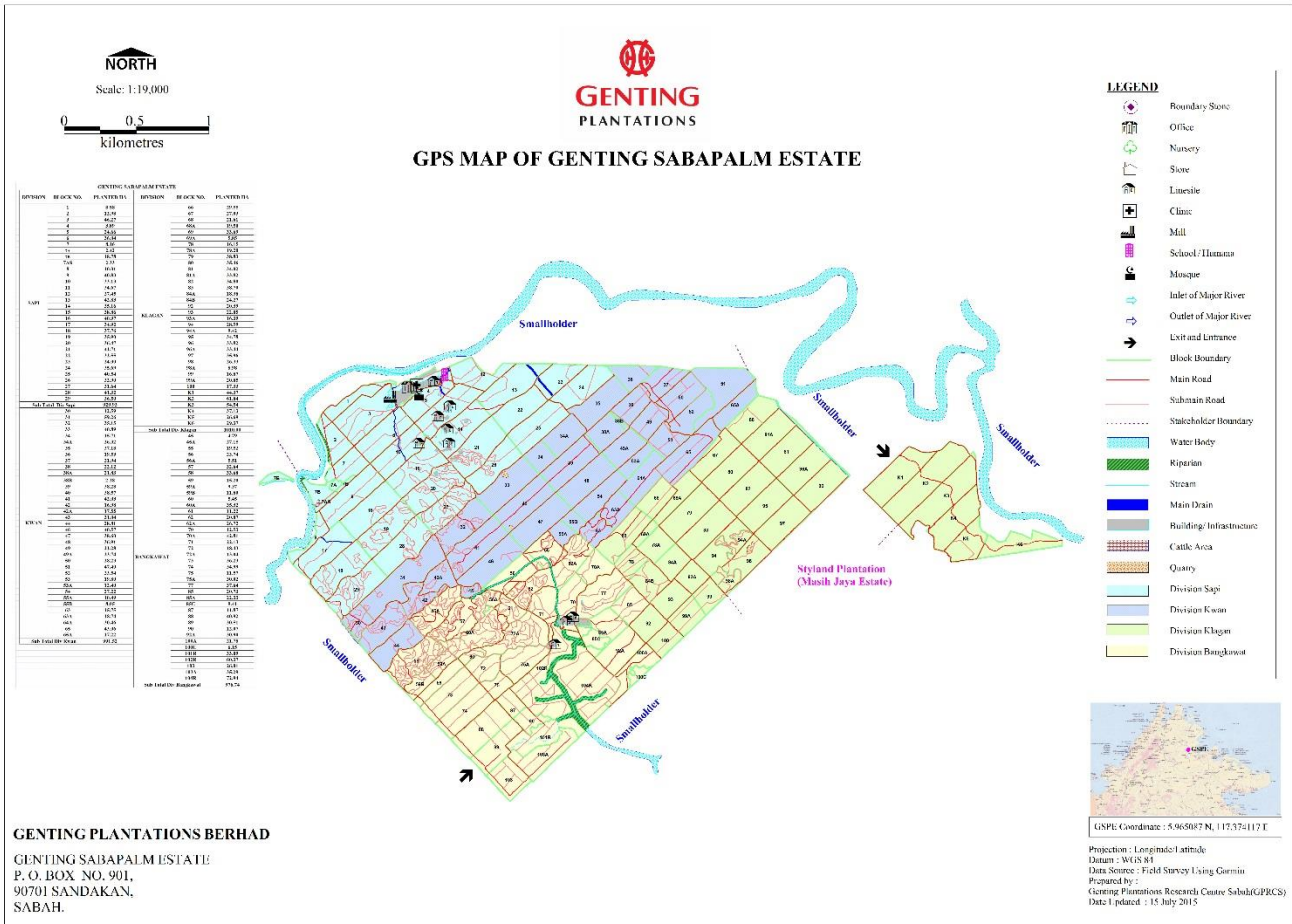
<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0



**Appendix H: Location Map and Genting Sabapalm Oil Mill**



**Appendix I: Genting Sabapalm Estate**



**Appendix J: List of Smallholder Sampled**

- Not applicable -

**Appendix K: List of Abbreviations Used**

ASA	Annual Surveillance Assessment
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CIP	Continual Improvement Plan
CPO	Crude Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EIA	Environmental Impact Assessment
EMS	Environmental Management System
ERP	Emergency Response Plan
FFB	Fresh Fruit Bunch
GPB	Genting Plantations Berhad
GSOM	Genting Sabapalm Oil Mill
GSPE	Genting Sabapalm Estate
HCV	High Conservation Value
HIRARC	Hazard Identification, Risk Assessment and Risk Control
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
JTK	Jabatan Tenaga Kerja
KER	Kernel Extraction Rate
MPOA	Malaysian Palm Oil Association
MPOB	Malaysian Palm Oil Board
MPOM	Melewar Palm Oil Mill
MSDS	Material Safety Data Sheet
MSPO	Malaysian Sustainable Palm Oil
MY-NI	Malaysian National Interpretation
NGO	Non Governmental Organisation
OER	Oil Extraction Rate
OSH	Occupational Safety & Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RED	Renewable Energy Directive
RSPO	P&C Roundtable on Sustainable Palm Oil Principle & Criteria
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SHO	Safety and Health Officer
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
TBP	Time Bound Plan
WTP	Water Treatment Plant