

**MALAYSIAN SUSTAINABLE PALM OIL  
ANNUAL SURVEILLANCE ASSESSMENT 1  
Public Summary Report**

<b>GENTING PLANTATIONS BERHAD</b>
Client company Address: 10th Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
Certification Unit: Genting Ayer Item Oil Mill & Plantation Genting Ayer Item Oil Mill and Genting Plantation (Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate)
Location of Certification Unit: Batu 54, Jalan Johor 86100 Air Hitam, Johor, Malaysia

**Report prepared by:**  
Valence Shem (Lead Auditor)

**Report Number: 9673578**

**Assessment Conducted by:**  
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## Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
MPOB License	Genting Ayer Item Oil Mill:	500056-704000	
	Genting Kulai Besar Estate:	508591-102000, 508595-302000, 540060-011000	
	Genting Sri Gading Estate:	524435-102000, 508592-902000, 508842-111000	
	Genting Sungei Rayat Estate:	508590-202000, 501298-102000	
	Genting Tanah Merah Estate:	611773-002000, 538065-011000, 609122-002000, 559916-701000	
	Genting Tebong Estate:	501803-202000, 501667-602000, 53982-2011000	
Company Name	Genting Plantations Berhad		
Address	Head office: 10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia		
Group name if applicable:	Genting Plantations Berhad		
Subsidiary of (if applicable)	Genting SDC Sdn Bhd		
Contact Person Name	Mr Arunan Kandasamy (Senior Vice President-Plantations Malaysia)		
Website	<a href="http://www.gentingplantations.com/">http://www.gentingplantations.com/</a>	E-mail	<a href="mailto:Arunan.kandasamy@genting.com">Arunan.kandasamy@genting.com</a>
Telephone	03 2333 6510 (Head office)	Facsimile	03 2333 6575 (Head office)

1.2 Certification Information			
Certificate Number	Mill: MSPO 682363 Plantations: MSPO 696629		
Issue Date	29/6/2018	Expiry date	28/6/2023
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Stage 1 Date	NA		
Stage 2 / Initial Assessment Visit Date (IAV)	22-23/1/2018		
Continuous Assessment Visit Date (CAV) 1	11-14/2/2019		
Continuous Assessment Visit Date (CAV) 2	N/A		
Continuous Assessment Visit Date (CAV) 3	N/A		
Continuous Assessment Visit Date (CAV) 4	N/A		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date

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GAIOM, GKBE, GSGE, GSRE, GTME & GTBE: EU-ISCC-Cert-DE119-60183390	ISCC EU	ASG Cert GmbH	24.10.2018 – 23.10.2019
GTME: MPOB/CoP/NN/0003-2	Code of Good Nursery Practice for Oil Palm Nurseries	MPOB	20/12/2020
GTBE: MPOB/CoP/NN/0269	Code of Good Nursery Practice for Oil Palm Nurseries	MPOB	20/04/2019
GAIOM: ISO 14001: 2015 – EMS 00553	EMS	SIRIM QAS International Sdn Bhd	13.01.2020
GAIOM: OHSAS 18001 : 2007 – SR 0579	OHSAS	SIRIM QAS International Sdn Bhd	13.01.2020
GAIOM: MS 1722 : 2011 – SR 0580	OSHMS	SIRIM QAS International Sdn Bhd	13.01.2020
RSPO 653474	RSPO	BSI Services Malaysia Sdn Bhd	25.03.2020

**1.3 Location of Certification Unit**

Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Genting Ayer Item Oil Mill (60mt)	Ayer Item, Johor, Malaysia	1° 51' 25.6" N	103° 12' 43.0" E
Genting Kulai Besar Estate	Kulai, Johor, Malaysia	1° 36' 55.4" N	103° 36' 45.0" E
Genting Sri Gading Estate	Batu Pahat, Johor, Malaysia	1° 50' 17.8" N	103° 1' 5.6" E
Genting Sungei Rayat Estate	Batu Pahat, Johor, Malaysia	1° 54' 14.2" N	103° 00' 44.6" E
Genting Tanah Merah Estate	Tangkak, Johor, Malaysia	2° 16' 53.94" N	102° 33' 37.17" E
Genting Tebong Estate	Tebong, Melaka, Malaysia	2° 27' 19.97" N	102° 21' 38.44" E

**1.4 Plantings & Cycle**

Estate	Age (Years) - ha				
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30
Genting Kulai Besar	368.22	650.29	369.51	207.28	436.22
Genting Sri Gading	581.14	1,024.71	614.86	575.87	431.22
Genting Sungei Rayat	284.39	187.39	964.08	648.53	223.81

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Genting Tanah Merah	298.30	152.89	160.38	279.97	774.81
Genting Tebong	418.08	256.14	35.39	479.42	912.20
<b>Total</b>	<b>1,950.13</b>	<b>2,271.42</b>	<b>2,144.22</b>	<b>2,191.07</b>	<b>2,778.26</b>

### 1.5 Certified FFB Production (Actual) and Projected (tonnage)

Producer Group	Estimated (Jan18-Dec18)	Actual (Jan18-Dec18)	Forecast (Jan19-Dec19)
Genting Kulai Besar Estate	44,465.00	44,277.36	42,600.00
Genting Sri Gading Estate	69,150.00	61,804.35	67,670.00
Genting Sungei Rayat Estate	52,692.00	47,599.67	54,150.00
Genting Tanah Merah Estate	36,596.00	34,324.94	35,800.00
Genting Tebong Estate	40,000.00	32,206.90	35,940.00
<b>Total</b>	<b>242,903.00</b>	<b>220,213.22</b>	<b>236,160.00</b>

### 1.6 Certified CPO / PK Tonnage

Mill Capacity: 60 MT/hr	Estimated (Jan 2018 - Dec 2018)	Actual (Jan 2018 - Dec 2018)	Forecast (Jan 2019 - Dec 2019)
	FFB	FFB	FFB
	242,903.00	220,213.22	236,160.00
SCC Model: SG	CPO (OER: 20.20 %)	CPO (OER: 20.23 %)	CPO (OER: 21.15 %)
	49,066.41	44,549.13	49,948.00
	PK (KER: 5.10 %)	PK (KER: 5.06 %)	PK (KER: 5.15 %)
	12,388.05	11,142.79	12,162.00

### 1.7 Certified Area

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Kulai Besar	2,031.52	35.06	775.48	2,842.06	71.5
Genting Sri Gading	3,227.80	29.93	454.79	3,712.52	86.9
Genting Sungei Rayat	2,308.20	0.18	70.60	2,378.98	97.0
Genting Tanah Merah	1,666.35	45.30	89.21	1,800.86	92.5
Genting Tebong	2,101.23	43.19	72.84	2,217.26	94.8

TOTAL	<b>11,335.10</b>	<sup>1</sup> <b>153.66</b>	<b>1,462.92</b>	<b>12,951.68</b>	<b>87.5</b>
<sup>1</sup> Area different from previous certified due to re-survey activities					

**1.8 Details of Certification Assessment Scope and Certification Recommendation:**

BSI Services Malaysia Sdn Bhd has conducted the Annual Surveillance Assessment of Genting Plantations Berhad – Genting Ayer Item Certification Unit, located in Ayer Item, Johor comprising Genting Ayer Item Oil Mill, Plantations (Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate) and infrastructures.

The onsite assessment was conducted to assess the compliance of the certification unit against the MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders and MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill.

The assessment is a combined assessment for the mill and the group of estates that is supplying to the mill. However the assessment criteria for the mill and the estates were separated following to the required standards. The certification assessment scope is Genting Ayer Item POM which act as the group manager for Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate. This report is the combined report for both mills and both estates.

The onsite assessment was conducted on 11-14/2/2019.

Based on the assessment result, Genting Ayer Item Oil Mill and Genting Plantation (Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate) complies with the MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders and MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill and recommended for certification to be continued.

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn Bhd,  
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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.

### Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 11-14/2/2019. The audit programme is included as Appendix A. The approach to the audit was to treat the Genting Ayer Item Oil Mill and Plantations (Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungai Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate) as an MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, 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. MS 2530-3:2013 or MS 2530-4:2013 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 estates or smallholders sample were determined based on formula  $S = r\sqrt{n}$  where  $n$  is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula  $(r\sqrt{n})$ ; where  $r$  is the risk factor (may defers 1, 1.5 and 2 depending on risk), where  $n$  is total number of group members. The sampled smallholder listed in Appendix C.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the MSPO 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.

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 B.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment are detailed in Section 4.2.

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This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

This report was externally reviewed by MSPO approved Peer Reviewers 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 / Plantation / Group smallholders)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Genting Ayer Item Oil Mill	✓	✓	✓	✓	✓
Genting Kulai Besar Estate		✓		✓	✓
Genting Sri Gading Estate	✓		✓	✓	
Genting Sungei Rayat Estate		✓	✓		✓
Genting Tanah Merah Estate	✓	✓		✓	
Genting Tebong Estate	✓		✓		✓

**Tentative Date of Next Visit: January 6, 2020 - January 9, 2020**

**Total No. of Mandays: 8**

**BSI Assessment Team:**

**Valence Shem - Lead Assessor**

He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, stakeholders issues, workers issues, social issues and traceability. Able to communicate in Bahasa Malaysia and English.

**Flora Anthonymsamy - Team member**

She holds a Bachelor of Science majoring in Chemistry from the National University of Malaysia on 1990 and Masters in Business Administration with INSEAD Singapore. Twenty years of experience in quality assurance in various industries i.e. manufacturing and service. Tutor and Certified Lead Assessor for ISO 9001 and ISO 14001. Lectures on Quality Management Systems for Diploma/ Certificate and ASQ Certified Quality programmes. Member of CUC RSPO and MSPO Global Gateway Certifications audit team. Have conducted various audits in Malaysia & other countries for various Management Systems. During this assessment, she assessed on the aspects of land and legal issues, workers welfare, stakeholder consultation, social. She is fluent in Bahasa Malaysia and English languages.

**Accompanying Persons: N/A**



### 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.

- MSPO MS 2530-2:2013 – General Principles for Independent Smallholders
- MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders
- MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

#### 3.2 Details of Nonconformities and Opportunity for improvement

During the Annual Surveillance Assessment 1, there were 4 major and 1 minor nonconformities raised. The corrective action plans for all the NCRs have been accepted by the audit team members and the effectiveness and evidence of implementation shall be verified in the next surveillance assessment.

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1736818-201902-M1	<b>Clause &amp; Category (Major / Minor)</b>	4.2.2.3, MSPO Part 3 Major
<b>Date Issued</b>	14/2/2019	<b>Due Date</b>	13/5/2019
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	29/4/2019
<b>Statement of Nonconformity:</b>	The organization has not demonstrated that all related stakeholders are updated in the List of Stakeholder and reviewed as per frequency stated in procedure SMP-GPB-17 at Genting Tebong Estate and Genting Tanah Merah.		
<b>Requirement Reference:</b>	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.		
<b>Objective Evidence:</b>	1) List of Stakeholders dated 07/02/2019 for Genting Tebong Estate is not updated with stakeholders such as government agencies (DOE, MPOA, MAPA, JTK, EPF, Sosco etc.), hospitals/clinics, supplying mills, schedule waste contractor, supplier and Kampung Orang Asli Air Dusun as per stakeholder identification in Social Impact Assessment Report (dated 27-29 December 2017 by Sustainability Department). 2) List of external stakeholders dated 01/01/2019 for Genting Tanah Merah was also not updated with Eng Kee Estate, Workers Representatives and JTK as per identification in Social Impact Assessment Report dated 27-29 December 2017. 3) The last review conducted for internal stakeholders meeting was on 4 December 2018 in Genting Tebong Estate and no evidence of any review for 2018 even though Procedure SMP-GPB-17 (revision 02 dated 23/02/18) states two times (2x) review in a year.		
<b>Corrections:</b>	1) To update the stakeholders lists and stakeholder map as per the SIA report and SMP-GPB-32.		

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	2) Internal stakeholders meeting conducted on 01/03/2019 (for the first half of the year) and the second meeting is scheduled on 10/09/2019.
<b>Root Cause Analysis:</b>	1) GTBE: Change of documentation controller from Mr. Norrafiuddin (who had resigned) to Mr.Murali who does not have enough knowledge on the stakeholders verification and SIA report. - GTME: Failed to follow up on SIA report's stakeholder list issue. 2) Internal stakeholders meeting were missed out in the estate's yearly programme list.
<b>Corrective Actions:</b>	1) Documentation controllers of both GTBE & GTME to be trained on the stakeholders identification and verification based on SMP-GPB-32 and SIA reports. The stakeholder lists to be verified during Internal Audit. 2) To ensure internal stakeholders meeting added into the estate's yearly programme.
<b>Assessment Conclusion:</b>	Evidence submitted: <ul style="list-style-type: none"> <li>• GTBE &amp; GTME: Stakeholder list</li> <li>• GTBE &amp; GTME: SIA Report on stakeholder list issue</li> <li>• GTBE: Stakeholder meeting minutes and attendance record dated 1/3/19</li> <li>• Training record to Asst Managers &amp; Internal Audit Plan</li> <li>• GTBE &amp; GTME: Yearly programme schedule for stakeholder meeting</li> </ul> The corrective action and evidence found to be adequate to close the NCR. The effectiveness of implementation shall be verified in the next assessment.

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1736818-201902-M2	<b>Clause &amp; Category (Major / Minor)</b>	4.3.1.3, MSPO Part 3 Major
<b>Date Issued</b>	14/2/2019	<b>Due Date</b>	13/5/2019
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	29/4/2019
<b>Statement of Nonconformity:</b>	The latest legal requirements was not updated in the legal register (Legal Requirement Register LOR).		
<b>Requirement Reference:</b>	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.		
<b>Objective Evidence:</b>	Legal Requirements Register LOR dated 23/1/19 was not updated with the Social Security Act Amendment 2019.		
<b>Corrections:</b>	The 'Employees Social Security (Exemption No.2) Notification 2018' was updated in LRR and submitted for approval on 20-03-2019.		
<b>Root Cause Analysis:</b>	During the last LRR updating process/submission on 17 <sup>th</sup> Dec'18, HRAD (Human Resource & Administration Dept) yet to receive any circular from Ministry of Human Resources on the Social Security Amendment Act 2019.		
<b>Corrective Actions:</b>	To follow up closely with relevant government agencies for circular/memo on the updates to facilitate LRR updating process.		

<b>Assessment Conclusion:</b>	<p>Evidence submitted:</p> <ul style="list-style-type: none"> <li>• Updated LRR</li> <li>• Email notification on the updated LRR</li> </ul> <p>The corrective action and evidence found to be adequate to close the NCR. The effectiveness of implementation shall be verified in the next assessment.</p>
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<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1736818-201902-M3	<b>Clause &amp; Category (Major / Minor)</b>	4.4.2.1, MSPO Part 3 Major
<b>Date Issued</b>	14/2/2019	<b>Due Date</b>	13/5/2019
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	29/4/2019
<b>Statement of Nonconformity:</b>	The organization failed to ensure that all complaints and grievances are recorded and acted on by management effectively.		
<b>Requirement Reference:</b>	A system for dealing with complaints and grievances shall be established and documented.		
<b>Objective Evidence:</b>	<p>During audit, mandore Mr. Murugan from Genting Kulai Besar Estate stated that he has requested for free housing in 2017 but was not granted as per Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446).</p> <p>There is no documented record of his request or action of implementation from Management.</p>		
<b>Corrections:</b>	<p>Management will provide him a house soonest possible.</p> <p>In case house not available, management will pay defray special amount for the housing upon GM/HRAD approval.</p> <p>To document the request inside 'Complaints &amp; Grievances Book'.</p>		
<b>Root Cause Analysis:</b>	Management did not follow up due to verbal request from Mr. Murugan for a house to stay/ rest in the afternoons on working days.		
<b>Corrective Actions:</b>	Management staffs & executives to be trained on the Complaints & Grievance Procedure where they shall assist the complainants to write their requests/grievances into the Complaint Book.		
<b>Assessment Conclusion:</b>	<p>Evidence submitted:</p> <ul style="list-style-type: none"> <li>• Evidence house provided – photo &amp; letter</li> <li>• En. Murugan complaint record in 'Complaint &amp; Grievance Book'               <ul style="list-style-type: none"> <li>- Training record on Complaints &amp; Grievance procedure</li> <li>- Complaints &amp; Grievance Procedure – as training material</li> </ul> </li> </ul> <p>The corrective action and evidence found to be adequate to close the NCR. The effectiveness of implementation shall be verified in the next assessment.</p>		

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<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1736818-201902-M4	<b>Clause &amp; Category (Major / Minor)</b>	4.5.5.1, MSPO Part 3 Major
<b>Date Issued</b>	14/2/2019	<b>Due Date</b>	13/5/2019
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	29/4/2019
<b>Statement of Nonconformity:</b>	The maintenance of riparian zone was not effectively implemented.		
<b>Requirement Reference:</b>	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: d) Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.		
<b>Objective Evidence:</b>	Based on site visit at GKBE, Block 11A, there was no clear demarcation for the riparian zone and observed trace of herbicide application very close to the natural water ways.  Interview with the workers also revealed that they were not aware that there is a restriction to apply herbicides within the riparian zone.		
<b>Corrections:</b>	Instruction given to Assistant Manager in charge of Kulai Besar Estate (N) Division to preserve the riparian buffer zone by avoiding spraying and fertilizer application inside the demarcated area.  To demarcate clearly the Riparian Zone for better visibility & identification. Marking of the boundary shall be carried out using red ring painting (for mature palms) and pegging (for young palms) as per 'Riparian Buffer Zone Management' procedure SMP-GPB-14.  All sprayers and manuring workers to be retrained and educated.		
<b>Root Cause Analysis:</b>	Newly joined sprayers unsure of the riparian buffer zone area due to poor demarcation despite training provided.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- To monitor and maintain the riparian buffer zone demarcation every 4 months as per HCV checklist.</li> <li>- New sprayers to be trained and evaluated before start work.</li> </ul>		
<b>Assessment Conclusion:</b>	Evidence submitted: <ul style="list-style-type: none"> <li>• Photo – marking/demarcation of the riparian buffer zones</li> <li>• HCV checklist</li> <li>• Training records – all sprayers and manuring workers</li> </ul> The corrective action and evidence found to be adequate to close the NCR. The effectiveness of implementation shall be verified in the next assessment.		

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<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1736818-201902-N1	<b>Clause &amp; Category (Major / Minor)</b>	4.4.5.4, MSPO Part 3 Minor
<b>Date Issued</b>	14/2/2019	<b>Due Date</b>	Next assessment
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Genting Plantation has failed to ensure that contractor's employees salary is paid in accordance to Minimum Wage Regulation 2016.		
<b>Requirement Reference:</b>	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.		
<b>Objective Evidence:</b>	<p>Referring to harvesting contractor who supply manpower Chien Han Yuan, Hu Kim Soon and Thavarajen; salary payment from August to December 2018 to some of their workers eg Sahlan and Parmin was not being paid as per minimum wages regulation (RM 1000 per month). Workers were paid lesser and no monitoring by organization to ensure payment is paid as per regulation.</p> <p>Contractor Chein Hin Enterprise - worker Parmin has been short paid in October 2018 by RM 107.69.</p> <p>Interview with Sahlan during stakeholder consultation, he stated that he has been paid less than the amount of work he does. And his pay slip for Sept and Oct 2018 was not signed by Sahlan and salary tracking by organization shows that he has been paid lesser.</p> <p>The same scenario sighted for Hu Kim Soon and Thavarajan Enterprise for August to December 2018.</p>		
<b>Corrections:</b>	<p>The estate management had informed the contractors to submit the actual copy of the payslip to office.</p> <p>On the underpaid wages, the management will deduct from the contractors payment on March 2019 and pay back the workers directly.</p>		
<b>Root Cause Analysis:</b>	The estate had received copy of payslips from contractor which meets the minimum wage order. However, upon investigation we found that there were two different set of payslip which stated different paid amount.		
<b>Corrective Actions:</b>	From April 2019 onwards, all the contractors workers payslip will be generated by the estate office and the workers salary will be directly bank-in to their individual accounts.		
<b>Assessment Conclusion:</b>	The CAP is accepted. The implementation of the CAP shall be verified in the next assessment visit.		

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<b>Noteworthy Positive Comments</b>	
1	Good relationship being maintained with surrounding communities.
2	Mill has continued maximized the use of renewable energy by consuming fibre and shell which produced through internal process.
3	Good cooperation from the management team in facilitation the assessment.

**3.3 Status of Nonconformities Previously Identified and OFI**

Major Nonconformities:		
Ref	Area/Process	Clause
1578654-201801-M1	Genting Ayer Item Oil Mill & Plantation	Part 3: [4.3.1.1 ]
Requirements:	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.	
Statement of Nonconformity:	Sampled of the payslips and checkroll attendance records found that the checkroll piece-rated workers and contractors' workers were not paid according to Employment Act 1955, Section 60D, Subsection 3 (a) Notwithstanding subsections (1), (1A) and (1B), any employee may be required by his employer to work on any paid holiday to which he is entitled under the said subsections and in such event he shall, in addition to the holiday pay he is entitled to for that day—(ii) "in the case of an employee employed on piece rates, be paid twice the ordinary rate per piece" and Section 60, Subsection 3(d) "In the case of an employee employed on piece rates who works on a rest day, he shall be paid twice his ordinary rate per piece."	
Objective Evidence:	Sampled of the payslips and checkroll attendance records found that the checkroll piece-rated workers and contractors' workers were not paid twice the ordinary rate per piece for the workers who worked on rest day or paid public holiday as below: i) Passport No.: A2398889 (Contractor: Tan Ah Sang) - December 2017 ii) Passport No.: B4064725 (Contractor: Tan Ah Sang) - December 2017 iii) Passport No.: B5355987 (Contractor: Tan Ah Sang) - December 2017 iv) Passport No.: B4962145 (Contractor: Apeng Resources) - December 2017 v) Passport No.: AT801119 (Contractor: Apeng Resources) - December 2017 vi) Employee ID: 03603 (September 2017) vii) Employee ID: 03559 (September 2017) viii) Employee ID: 03593 (September 2017) ix) Employee ID: 03538 (September 2017)	
Corrections:	All affected employees at the 5 estates (GSGE, GTME, GTBE, GSRE & GKBE) to be paid for the month of Dec 2017.  Assessment Team Verification: Proved of payments was reviewed to confirm correction has been completed.	
Root cause analysis:	The management was guided by the previous agreement with the workers (v1.0 dated 27-07-16) which stated that management offer work (during RD & PH) only for daily rated workers, and not piece rated workers.	
Corrective Actions:	1. Group policy on Rest Day/Public Holiday work (only with written approval by VP) was issued on 1 Jan 2018. 2. Agreement with workers (v2.0 dated 1/1/18) - clause 10, was amended to include both the daily rated and piece rated workers. 3. Consultation and continuous reminder to be made with 'piece rated' and 'daily rated' employees to explain as per the memorandum/policy dated 1 Jan 2018.  Justification for closure by assessment team: Closed on 26/03/2018	

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	<ol style="list-style-type: none"> <li>1. Sighted the list of workers that are required to be compensated due to work on Sunday in December 2017 at GSGE. The bunches identified in the compensation list was verified with check-role workers' the daily inputs to be consistence.</li> <li>2. The revise Contract template dated 21/03/2018 has clearly define the payment for work on rest day and holiday. In GSGE there was 15 new workers. The revised contract has been implemented.             <ol style="list-style-type: none"> <li>a. Zulhaki (harvester) joined on 17/03/2018</li> <li>b. Hapizur Rahman (harvester) joined on 17/03/2018</li> <li>c. Veri Andriawan (harvester) joined on 17/03/2018</li> <li>d. Juleni (harvester) joined on 17/03/2018</li> <li>e. Rijalul Hadi (harvester) joined on 17/03/2018</li> </ol> </li> <li>3. For existing workers, an addendum template dated 21/03/2018 for the existing employment contract that clearly define the payment for work on rest day and holiday has been distributed to the workers and agreed upon.             <ol style="list-style-type: none"> <li>a. Romjam GAIOM</li> <li>b. Pandey GAIOM</li> <li>c. Julani GSGE</li> <li>d. Mahrip GSGE</li> <li>e. Mawar GSGE</li> </ol> </li> </ol> <p>The Group Policy dated 01/01/2018 with regards to work on rest day and work on public holiday was communicated by Mr Foo See Sun tonPlantation VP and Estate Manager on 17/01/2018. The Policy clearly indicated for work on rest day and work on public holiday, permission must be given by VP Plantation. There were no work on rest day and work on public holiday at GSGE since 17/01/2018. Hence no request/approval was available.</p>
<p>Assessment Conclusion:</p>	<p>With the implementation on new contract agreement and new policy, the assessment team deemed the non-compliance can be effectively address. The continuous implementation will be verified in the next assessment.</p>
<p>Verification on this assessment</p>	<ul style="list-style-type: none"> <li>- Group policy on Rest Day/Public Holiday work circular issued on 1 Jan 2018 sighted.</li> <li>- Agreement with workers has been included on the daily rated and piece rated workers and as per minimum wage requirements specified in their contract eg Fikri (contractor worker)</li> <li>- Seen pay slip of Fikri and Hamidun for Dec 18 and Jan 19 and seen 2x rate for rest day work.</li> </ul> <p>No recurrence of issue and therefore the NC remains closed.</p>

<b>Minor Nonconformities:</b>		
Ref	Area/Process	Clause
1578654-201801-N1	Genting Ayer Item Oil Mill & Plantation	Part 3: [4.4.5.14 ]
Requirements:	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable	



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	on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.
Statement of Nonconformity:	Hazardous working condition was exposed to the newly recruited worker who is below 18 years old where it did not according to the company's policy.
Objective Evidence:	Document verified the List Name of Workers found that the company has recruited a worker at age 17 on 13/12/2017 for grass cutting activities with Employee No.: 03094 in Genting Tanah Merah Estate. Seen at the Social Policy where the company will not employed workers less than 15 years of age for full-time work and 18 years of age for hazardous work.
Corrections:	The worker was sent to 'non-hazardous' and 'non-pesticides' related job wef 30/1/2018, until he attain 18 years old.  A memo was issued followed by briefing to all level of executives and staffs on the minimum age requirement.
Root cause analysis:	No monitoring on the age requirement when recruiting the worker.
Corrective Action Plan:	1. Briefing on minimum age requirement to all level of executives and staffs to check and monitor age when recruiting workers.  2. GENPIT/Lintramax:  To amend the Lintramax system to restrict / to ensure workers above 18 years only are allowed to be registered as an employee.
Assessment Conclusion:	The effectiveness of the corrective action will be verified in the next assessment.
Verification on this assessment	Evidence verified: <ul style="list-style-type: none"> <li>- Briefing on age limit was conducted together with MSPO policies to standard and employees on 18/10/18</li> <li>- SMP-GPB-22 (rev 06 dtd 31/01/19) has been updated to employ only 18 years and above.</li> <li>- GENPIT/Lintramax system – auto message prevents from any lower 18 years age employment</li> <li>- List of employees dated January 19 – no one below 18 years including contractor workers</li> </ul> <p>The evidence was found to be adequate and therefore the minor NC is closed.</p>

Minor Nonconformities:		
Ref	Area/Process	Clause
1578654-201801-N2	Genting Ayer Item Oil Mill & Plantation	Part 3 & Part 4: [4.1.2.1 ]
Requirements:	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.	
Statement of Nonconformity:	Internal Audit conducted not clearly indicate the MSPO requirements	
Objective Evidence:	The findings raised during internal audit conducted on January 2018 were only referenced to RSPO requirements in which the incompliance was not identified for MSPO.	

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Corrections:	To include the 'MSPO clause requirements' in the Internal Audit reports.
Root cause analysis:	Internal audit procedure for combined sustainability audits (RSPO and MSPO) not available.
Corrective Action Plan:	To review Sustainability Internal Audit procedure (SMP-GPB-03) to include relevant requirements for the combined sustainability audits (RSPO, MSPO and ISCC).  To review and update checklist used for combined RSPO and MSPO internal audit.
Assessment Conclusion:	The effectiveness of the corrective action will be verified in the next assessment.
Verification on this assessment	Evidence verified: <ul style="list-style-type: none"> <li>- Latest version of internal audit procedure entitled "Sustainability Internal Audit" document no SMP-GPB-03, rev. 4, dated 25 May 2018</li> <li>- Internal audit report conducted on 10-12/12/2018 and 18-20/12/2018 by the Sustainability Manager, where all the clauses of the MSPO Standards were included</li> </ul> <p>The evidence was found to be adequate and therefore the minor NC is closed.</p>

**Minor Nonconformities:**

Ref	Area/Process	Clause
1578654-201801-N3	Genting Ayer Item Oil Mill & Plantation	Part 4: [4.2.2.3]
Requirements:	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.	
Statement of Nonconformity:	The list of stakeholders is incomplete	
Objective Evidence:	The list of stakeholders is not updated accordingly. For example, there is no contact details for Sekolah Agama Sri Maju Jaya and Tabika Kemas.	
Corrections:	To update immediately all the contact number of stakeholders in the list including 'Sekolah Agama Sri Maju and 'Tabika Kemas'.	
Root cause analysis:	Stakeholders list was not verified & updated periodically (at least once a year) as per Social Management Procedure SMP-GPB-32.	
Corrective Action Plan:	To train document controller to review, verify and update stakeholders in the list on yearly basis, or as and when necessary (as per Social Management Procedure SMP-GPB-32).	
Assessment Conclusion:	The effectiveness of the corrective action will be verified in the next assessment.	
Verification on this assessment	Evidence verified: <ul style="list-style-type: none"> <li>- List of stakeholders dated 21/01/2019 is updated with the relevant details e.g. for Southern Strength (M and Tuan Zainal Abidin bin Ahmad. Additional list of smallholders and villagers were added after SIA 16 -17/1/19 as a separate sheet.</li> <li>- Training records for Document Controller – Mohd Isa bin Karjah on list of stakeholders updating was carried out on 03/01/2019.</li> </ul>	

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	The evidence was found to be adequate and therefore the minor NC is closed.
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<b>Minor Nonconformities:</b>		
<b>Ref</b>	<b>Area/Process</b>	<b>Clause</b>
1578654-201801-N4	Genting Ayer Item Oil Mill & Plantation	Part 4: [4.5.1.2]
Requirements:	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations.	
Statement of Nonconformity:	Management plan for effluent treatment was not identified	
Objective Evidence:	During the visit to the effluent pond, the free board of Pond 4 is less than 0.5m (almost reaching the bund). The management plan has not identify what is the mitigation required to ensure that the effluent does not overflow.	
Corrections:	Update the 'Water Management Plan' by specifying the free board 0.7m for effluent pond and specifying the mitigation plans.	
Root cause analysis:	No monitoring on the freeboard (as per Jadual Pematuhan) caused failure to identify the mitigation plans.	
Corrective Action Plan:	To train operators on the mitigation plans when freeboard is less than 0.7m.  To train document controller to review and update Water Management Plan and other documents in quarterly basis.	
Assessment Conclusion:	The effectiveness of the corrective action will be verified in the next assessment.	
Verification on this assessment	Evidence verified: - Based on site visit, it was observed that the free board for the effluent pond was more than 0.7 m. Indicator was also installed for the operator to monitor the level of free board. The operator was also able to explain the importance of ensuring the free board at its regulated limit.  The evidence was found to be adequate and therefore the minor NC is closed.	

**3.4 Issues Raised by Stakeholders**

IS #	Description
1	<b>Issues</b> Contractor – He informed that there was no issues working with management for the past 7 years. He works normal working hours and overtime for the daily job that he does. He has no workers. He has been provided housing by management but declined it. His payment is prompt with receipt and banking into his account.
	<b>Management Responses</b> No further action required.
	<b>Audit Team Findings</b> No issue. Both parties have good communication and relationship.
2	<b>Issues</b> Contractor supplying workers – He supplies 45 workers. Yearly contract renewal. Contractor workers are provided with housing, water and electricity.
	<b>Management Responses</b> No further action required.
	<b>Audit Team Findings</b> No issue. Both parties have good communication and relationship.

**3.5 Summary of the Nonconformities and Status**

CAR Ref.	CLASS	ISSUED	STATUS
1578654-201801-M1	Major	23/1/2018	Closed on 26/3/2018
1578654-201801-N1	Minor	23/1/2018	Closed on 14/2/2019
1578654-201801-N2	Minor	23/1/2018	Closed on 14/2/2019
1578654-201801-N3	Minor	23/1/2018	Closed on 14/2/2019
1578654-201801-N4	Minor	23/1/2018	Closed on 14/2/2019
1736818-201902-M1	Major	14/2/2019	Closed on 29/4/2019
1736818-201902-M2	Major	14/2/2019	Closed on 29/4/2019
1736818-201902-M3	Major	14/2/2019	Closed on 29/4/2019
1736818-201902-M4	Major	14/2/2019	Closed on 29/4/2019
1736818-201902-N1	Minor	14/2/2019	Open

**3.6 Summary of the findings by Principles and Criteria**

**MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	A policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	The company has initiated the implementations of MSPO requirements. MSPO Policy has been established and signed by President & Chief Operating Officer dated 18/3/2014.	Yes
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. <b>- Major compliance -</b>	The established policy has emphasized on the commitment to continual Improvement within the journey towards achieving sustainable palm oil.	Yes
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	Internal Audit has been conducted on 10-12/12/2018 and 18-20/12/2018 by the Sustainability Manager based in Genting HQ, KL, covering both mill and estates. 23 NCRs were raised as a result of the audit. All of the NCRs have been closed by the lead auditor. Based on the audit report, the root causes were effectively identified for corrective actions establishment.	Yes
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of	Internal Audit procedure is available under SMPM (sustainability management procedure manual), entitled "Sustainability Internal	Yes

Criterion / Indicator		Assessment Findings	Compliance
	strengths and root causes of nonconformities, in order to implement the necessary corrective action. <b>- Major compliance -</b>	Audit" document no SMP-GPB-03, rev. 4, dated 25 May 2018. Among the contents covered in the procedure are audit criteria, audit schedule, audit plan, responsibility of lead auditor & auditee and audit report, which to be kept for 10 years.	
<b>4.1.2.3</b>	Report shall be made available to the management for their review. <b>- Major compliance -</b>	Report of Internal Audit for all the visited estates were made available for review.	Yes
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. <b>- Major compliance -</b>	Management Review procedure was established accordingly, refer to Sustainability Management Procedure Manual (SMP-GPB-06), rev. 1, dated 25/5/2018. The MRM for MSPO was done in January 2019 participated by all the key persons of estates and mill. Among the agenda discussed in the meeting were: 1) Status of outstanding issues from previous meetings 2) Changes, improvement or modification of the sustainability management system (SMS) 3) Internal and external audit findings (SMS) 4) Complaints and grievance book 5) Enquiry register book 6) Stakeholder management reports/minutes 7) Risk management 8) Greenhouse value 9) Review continual improvement status & recommendations 10) Review on resource & training requirements 11) Review on sustainability policy & its objectives status	Yes

Criterion / Indicator		Assessment Findings	Compliance
		12) Review of effectiveness in achieving QEO objectives 13) Compliance status on legal & other requirements 14) Other matters 15) Preventive & corrective actions 16) Recommendations for improvement 17) Result of internal RSPO SCCS & MSPO SCCS audit 18) Customer feedback 19) Changes that could affect the management system	
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.  <b>- Major compliance -</b>	Sample of Continual Improvement for 2019 at all estate visited: <ol style="list-style-type: none"> <li>1. Minimize use of pesticides</li> <li>2. To improve on environmental aspects and impacts, risk assessment and risk control</li> <li>3. Waste reduction</li> <li>4. Pollution and greenhouse gas (GHG) emissions.</li> <li>5. Social impacts</li> <li>6. Encourage optimizing the yield of the supply base</li> <li>7. Efficient fertilizer management</li> <li>8. Efficient diesel and electricity consumption</li> </ol>	Yes
<b>4.1.4.2</b>	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.  <b>- Major compliance -</b>	The new information and techniques to improve practices are obtained mainly through information from communications with suppliers and being members of associations related to palm oil industry (e.g. ISP).	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established.  - <b>Major compliance</b> -	Action plans were available in all the visited estates, the action plan is cover for environment, workers' needs, safety and others. Trainings on SOPs were also conducted from time to time to enhance the current techniques of agriculture best practice. This was evident through availability of training records and interview with workers.	Yes
<b>4.2 Principle 2: Transparency</b>			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.  - <b>Major compliance</b> -	<p>Management has communicated the information requested by the relevant stakeholders in the appropriate languages by sending letters in English and Malay to new external stakeholder. Letter was sent to explain on the RSPO/MSPO principles and policies to new external stakeholder. A letter is sent to explain on the RSPO/MSPO principles and policies to Ah Loi Earthworks (Backhoe). Explanation is also conducted during stakeholders' consultation.</p> <p>Besides work contract, contractors and service providers and other external stakeholders, are invited for stakeholder consultation and discussion/explanation was conducted.</p> <p>For internal employees and contractors, they have policies displayed on notice boards and training is provided, yearly refresher training is conducted and regular reminders during muster.</p> <p>Sighted salary slip explained in different languages – Tamil, Bahasa Indonesia, Bangladesh and Sri Lankan displayed at notice board outside office.</p>	Yes



Criterion / Indicator		Assessment Findings	Compliance
<b>4.2.1.2</b>	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.  - <b>Major compliance</b> -	Management documents are publicly available and policies are displayed in office notice boards and line site. Social Policy, Sustainability Policy, People Policy, MSPO Policy, OSH Policy , Environmental Policy displayed in English and Bahasa Malaysia.	Yes
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication with the relevant stakeholders.  - <b>Major compliance</b> -	Procedure consultation and communication (SMP-GPB-17) dated 23/02/18 has been established.	Yes
<b>4.2.2.2</b>	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.  - <b>Minor compliance</b> -	Management official nominated to be responsible for consultation and communication issues at estates are the Estate Managers.	Yes
<b>4.2.2.3</b>	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.  - <b>Major compliance</b> -	<u>Kulai Besar</u> List of stakeholders dated 07 Feb 19. External stakeholders are 35 and internal stakeholders are 25. Last meeting of stakeholders internal conducted 27/08/18 and report available and maintained. Stakeholders' consultation with external stakeholders dated 11/10/18. Discussion on MSPO, RSPO and ISCC integrated together in the same meeting.  <u>Tanah Merah</u>	No

Criterion / Indicator	Assessment Findings	Compliance
	<p>List of external stakeholders dated 01/01/2019 totalling 57 stakeholders including neighbours, small holders, durian planter, government bodies, schools, temple and surau . Internal stakeholders list dated 01/01/2019 total 38 with in house contractors for transportation, workers, backhoe, shops, and repairing contractors. Stakeholders' consultation minutes dated 25/10/18 attended by 20 external stakeholders. Requests and complaints are commented and management has replied. Action is completed for 3 items and 3 is pending. Internal stakeholders meeting was held on 24/10/18 involving mainly internal contractors for harvester workers supply, shop, backhoe and pesticide supplier; total 17. No concerns raised.</p> <p><u>Tebong</u> List of internal stakeholders dated 07 Feb 19.</p> <p>Last meeting of internal stakeholders was conducted on 4/10/17 and report available. But this does not follow the procedure Consultation and Communication SMP-GPB-17(rev 02 dated 23/02/18) where it states the frequency of internal stakeholders consultation shall be carried out twice a year. No consultation was carried out in 2018.</p> <p>Stakeholders' consultation with external stakeholders dated 14/12/18 and attended by 12 participants.</p> <p>SIA report dated 27 -29 December 2017 conducted by Sustainability Department was not used to update the external stakeholders list as such government agencies (DOE, MPOA, MAPA, JTK, EPF, Sosco etc.), hospitals/clinics, supplying mills, schedule waste contractor, supplier and Kampung Orang Asli Air Dusun is not included into the</p>	

Criterion / Indicator		Assessment Findings	Compliance
		stakeholders list and as such no evidence of communication/invitation to them. Thus a non-conformity report was assigned due to this lapse.	
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). <b>- Major compliance -</b>	The traceability implementation is addressed in a procedure, SMPM, Traceability (Estate) [SMP-GPB-09, rev. 4, 24/8/2018]. The procedure describes the handling of outgoing FFB are carried out in proper manner so that traceability is ensured.	Yes
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	Inspection on compliance with the traceability procedure is regularly checked through supply chain internal audit. The internal audit report dated Dec 2018, which was carried out together with other schemes such as RSPO, was available for verification.	Yes
<b>4.2.3.3</b>	The management should identify and assign suitable employees to implement and maintain the traceability system. <b>- Minor compliance -</b>	The Estate Manager is the person assigned to implement and maintain the traceability system.	Yes
<b>4.2.3.4</b>	Records of sales, delivery or transportation of FFB shall be maintained. <b>- Major compliance -</b>	The records and documents related to FFB traceability such as bunch chit, weighbridge tickets and daily FFB delivery records were adequately maintained.	Yes
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			

Criterion / Indicator		Assessment Findings	Compliance
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. <b>- Major compliance -</b>	Estate operations are in compliance with the applicable local, state, national and ratified international laws and regulations. Legal Requirement Register (LRR) Document No. SMP-GPB-22 (rev 06) was available for verification.	Yes
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. <b>- Major compliance -</b>	The relevant laws were listed in Legal Requirement Register (LRR) [SMP-GPB-22, rev. 7 dated 19 April 2019]. Among the laws covered in the list were EQA, Employment Act, OSHA, FMA to name a few. The amendment/update of the list is done by Systems, Methods, Insurance and Risk Management Department (based in KL).	Yes
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. <b>- Major compliance -</b>	Among the newly registered laws were: <ul style="list-style-type: none"> <li>- Minimum Wage Order (from 2016 to 2018)</li> <li>- Employment (restriction) Act 1968 (from 2006 to 2017)</li> <li>- Employment Insurance System Act 2017</li> <li>- Sabah Labour Ordinance Cap 67, 1950</li> <li>- EQ (Clean Air) Regulations (from 1978 to 2014)</li> <li>- Employees Social Security (Exemption No. 2) Notification 2018</li> </ul> However, at Tebong Estate, the management has not listed all laws applicable to their operations in their legal requirements register (LRR dated 23/1/19) The management failed to identify Social Security Act Amendment 2019. Thus a non-conformity report was assigned due to this lapse.	No
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. <b>- Minor compliance -</b>	A mechanism for tracking changes in law is guided by SMPM Procedures on Regional, National and International Laws [SMP-GPB-21, rev. 1, 14/4/2014]. Generally the mechanism is by monitoring or consultation with various sources (e.g. government agencies, electronic & non-electronic media, legal firms, professional bodies, industry association/organization and NGO). The Genting's Systems,	Yes

Criterion / Indicator		Assessment Findings	Compliance
		Methods, Insurance and Risk Management Department (based in KL) is the person responsible to handle the task.	
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p><b>- Major compliance -</b></p>	<p><u>Kulai Besar</u></p> <p>The management has ensured that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p>Land is owned by Genting Kulai Besar Estate. Land titles available and listed in list dated 6/08/15 and total 33 titles (32 Kulai Besar + 1 Kulai North).</p> <p>Original land titles at HQ.</p> <p>2,842.06 hectares and planted 2,035.25 hectares.</p> <p>Kulai Besar – 1938.82 hectares, Kulai North – 634.20 hectares and property – 806.81 hectares.</p> <p><u>Tanah Merah</u></p> <p>The management has ensured that their oil palm cultivation activities do not diminish the land use rights of other users. Land belongs to Genting Palm Berhad (Asiatic Plantations) . Total land 1800.992 hectares due to given to TNB from 1,803.992 and planted is 1,666.35 hectares. Total land titles is 35.</p> <p><u>Tebong</u></p> <p>The management has ensured that their oil palm cultivation activities do not diminish the land use rights of other users.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		<p>Land is owned by Genting Plantations Tebong Estate.</p> <p>Home division – 702.65 planted / total 742.11</p> <p>Batang Melaka – 757.59 planted/total 773.87</p> <p>Repah- 457.54 planted/ 507.71 (12.8 hectares given to TNB)</p> <p>See Kee183.45 planted/194.11</p> <p>Total planted : 2101.23 hectares</p> <p>Total : 2.217.26 hectares</p> <p>Land titles available and listed in list dated 01/02/2019 and total 22 titles. (total hectares 2,228.75 hectares)</p> <p>Original land titles at HQ.</p>	
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p><b>- Major compliance -</b></p>	<p><u>Kulai Besar</u></p> <p>The management has 33 land titles showing legal ownership, history of land tenure and the actual use of the land.</p> <p>Land use is stated in the ownership for plantation and property development.</p> <p><u>Tanah Merah</u></p> <p>Management has provided documents showing legal ownership of 35 copies of land titles. Original land titles are kept at HQ.</p> <p><u>Tebong</u></p> <p>The management has provided 22 land titles showing legal ownership, history of land tenure and the actual use of the land.</p> <p>Land use is stated in the ownership for plantation.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
<b>4.3.2.3</b>	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. <b>- Major compliance -</b>	All the perimeter boundaries were clearly marked as per SOP. The boundary stones was sighted at all the visited estates. Apart from that, trenching was also part of the method in marking the boundaries.	Yes
<b>4.3.2.4</b>	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). <b>- Minor compliance -</b>	No disputes recorded. The land has been under Genting (formerly Asiatic Corporation) from 1981. Procedure on Negotiation, Compensation and Handling which includes FPIC (SMP-GPB18) dated 29/12/2017.	Yes
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. <b>- Major compliance -</b>	The lands are not encumbered by customary rights. The customary land beside - Bukit Putus and Air Dusun are owned by the natives and identified in map and list of stakeholders. No disputes raised.	Yes
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. <b>- Minor compliance -</b>	Map shows the recognized customary rights land – Bukit Putus and Air Dusun and left to the native people.	Yes
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. <b>- Major compliance -</b>	No issue on customary rights hence no negotiations and FPIC carried out as the land title is under GTBE. Procedure on Negotiation, Compensation and Handling which includes FPIC (SMP-GPB18) dated 29/12/2017	Yes

Criterion / Indicator	Assessment Findings	Compliance
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>		
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>		
<b>4.4.1.1</b>	<p>Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.</p> <p><b>- Minor compliance –</b></p> <p><u>Kulai Besar</u>            Social Impact Assessment (SMP-GPB-12 dated 18/01/18) conducted on 23 – 28 January 2019. Interview and consultation with 20 respondents conducted ie village Head, small holders, workers representative, foreign workers representatives (Indonesian, Indian, Bangladesh and Sri Lankan), contractor (2) and suppliers (2). Report compiled by Sivaji Raja (Sustainability Department).</p> <p>SIA External stakeholders:            Positive issues and 2 improvement items to deepen trench and desilt river to prevent flooding.</p> <p>SIA Internal stakeholder was conducted and one negative issue was recorded by Line site GKBE. Sighted open burning, pesticide containers used for water storage, missing window panes, blocked drains, insufficient cloth hanger - mitigation action of briefing scheduled for 12/02/19 &amp; 20/02/19.</p> <p><u>Tanah Merah</u>            Procedure SMP-GPB-32 dated 18/01/18 states SIA to be done at least 2 years once.</p> <p>Last SIA was conducted 12-20 Dec 17 and actions have been taken and being implemented and pending items are being monitored.</p>	<p>Yes</p>



Criterion / Indicator	Assessment Findings	Compliance
	<p>SIA Report states new stakeholders needs to be added on to the list of stakeholders; however this is not consistently done. Cattle owners are added but Eng Kee Estate, Workers Representatives and JTK is not updated into Stakeholder List dated 01/01/2019 and no evidence of 'letter to stakeholder' to this new stakeholders.</p> <p><u>Tebong</u></p> <p>Social Impact Assessment (SMP-GPB-12 dated 18/01/18) conducted on 27 – 29 December 2017. Interview and consultation with 16 respondents was conducted including village head, small holders, cattle farmers, workers representative, foreign workers representatives (Indonesian, Indian, Bangladesh, FFB and temple head. Report compiled by Sivaji Raja (Sustainability Department).</p> <p>SIA External stakeholders:</p> <p>Positive issues and negative items stated has been worked on.</p> <p>En Haji Hassim bin Dollah - Village Head Kg Tebong Station stated that he is not aware of job vacancies at estate. Management send official letter for vacancies to village head to promote among their villagers.</p> <p>SIA Internal stakeholder :</p> <p>Worker Sahlan states that he does not receive the minimum wage salary. Letter has been sent to contractor and two meeting has been</p>	

Criterion / Indicator		Assessment Findings	Compliance
		held with contractors on 22/12/18 and 7/1/2019 for awareness and implementation.	
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p><b>- Major compliance -</b></p>	<p><u>Kulai Besar</u></p> <p>A system for dealing with complaints and grievances has been established and documented “Complaints and grievances” procedure SMP-GPB-19. A clear flowchart is appended. Book with serial numbers forms has been prepared.</p> <p>But during stakeholder consultation , mandore Murugan stated that he has requested for housing and was not provided but there is no evidence of documented proof that his request /grievance is recorded into the record book as per procedure. Thus a non-conformity report was assigned due to this lapse.</p> <p><u>Tanah Merah</u></p> <p>A system for dealing with complaints and grievances has been established and documented “Complaints and grievances” procedure SMP-GPB-19. A clear flowchart is appended. Book with serial numbers forms has been prepared.</p> <p>Complaint/grievances book is used for internal complaints ie house repairs, grass, etc and acted by management.</p> <p>External requests/complaints are using the same mechanism but a separate book.</p>	No

Criterion / Indicator		Assessment Findings	Compliance
		<p><u>Tebong</u></p> <p>A system for dealing with complaints and grievances has been established and documented “Complaints and grievances” procedure SMP-GPB-19. A clear flowchart is appended. Book with serial numbers forms has been prepared.</p> <p>But from 2017, this identified complaint book is not being used for any internal stakeholders’ request (e.g. house repairs, assistance etc.) This is not as per procedure.</p> <p>For internal requests/complaints i.e. house repairs, a maintenance book is used.</p>	
<b>4.4.2.2</b>	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p><b>- Major compliance -</b></p>	<p><u>Kulai Besar</u></p> <p>The system enables to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties</p> <p>Most internal complaints are on housing matters such as tap leaking, house leaking, lights not working etc.</p> <p>Sampled No 098 – by Amirul 2/2/19.</p> <p>Complaint: Outsiders from Taman Muhibbah comes into estate area and this is risky for workers belongings safety.</p> <p>Respond: Management will ensure security guards patrol more frequently and the locks will be changed at the gates.</p> <p>Action.</p> <p>Respondent has acknowledged satisfaction of action 5/2/19.</p> <p>Sampled No 095- by Sahdan 16/11/18</p>	Yes

Criterion / Indicator	Assessment Findings	Compliance
	<p>Complaint : Dogs coming into estate at night</p> <p>Respond: Dogs are from neighbouring housing area – Taman Muhibah. Patrolling is tightened and gates are locked at night to prevent dogs from coming into line site area.</p> <p>Respondent acknowledged on 22/11/18.</p> <p>Verified during line site visit that dogs do not come near to housing and no cases of dog bites/chase.</p> <p><u>Tanah Merah</u></p> <p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties Sampled 10/10/18 for workshop roof damaged due to heavy rain and repaired and signed off on 19/10/18.</p> <p>Sampled Rukumani dated 6/12/18 requesting light and door problem at house no LQ 52. Task completed and acknowledged back on 7/12/18.</p> <p>Sugumaran (Kerani Ladang Tanah Merah Tamil school) has requested for assistance JBD9006/400-1/3/10 dated 6/12/18 and responded by management and signed off by requester on 12/2/19.</p> <p><u>Tebong</u></p> <p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties External</p>	

Criterion / Indicator		Assessment Findings	Compliance
		<p>complaints/requests is recorded in Enquiry and Complaint book and is acknowledged by requester/complainant.</p> <p>E.g. Jamaliah binti Doraman (rubber planter neighbouring estate) has complained on 24/12/18 regarding broken bridge and the bridge was repaired and acknowledged by her on 28/12/18.</p>	
<b>4.4.2.3</b>	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p><b>- Minor compliance -</b></p>	<p><u>Kulai Besar</u></p> <p>A complaint book/form has been made available at the premises, where employees and affected stakeholders can make a complaint. Complaint forms with serial numbers available at office. Also, the workers can write a note and submit to mandore who then brings it to office and sticks on the complaint forms.</p> <p>External stakeholders can also write in or walk in to office to lodge their complaints/requests.</p> <p><u>Tanah Merah</u></p> <p>A complaint book/form has been made available at the premises, where employees and affected stakeholders can make a complaint. Complaint forms with serial numbers available at office. External stakeholders can also write in or walk in to office to lodge their complaints/requests.</p> <p>Worker interviewed Munian (union leader) and Wartono (harvester) knows the book at office for complaints.</p> <p><u>Tebong</u></p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		A complaint book/form has been made available at the premises, where employees and affected stakeholders can make a complaint. Complaint forms with serial numbers available at office. External stakeholders can also write in or walk in to office to lodge their complaints/requests.	
<b>4.4.2.4</b>	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p> <p><b>- Minor compliance -</b></p>	<p><u>Kulai Besar</u></p> <p>Complaint mechanism is explained in stakeholders consultation ie 27/8/18 for internal and 11/08/18 for external. Sighted meeting minutes on discussion on complaints/requests.</p> <p><u>Tanah Merah</u></p> <p>Employees and the surrounding communities has been made aware that complaints or suggestions can be made any time. During stakeholder consultation 13/02/19, Tok Batin and Veejaykumar understands that any complaints/suggestions can be by written letter or fill up form in office.</p> <p><u>Tebong</u></p> <p>Employees and the surrounding communities has been made aware that complaints or suggestions can be made any time. Complaint mechanism is explained in external stakeholders' consultation during consultation on 14/12/18. Sighted meeting minutes on discussion on complaints/requests.</p> <p>During audit 14/02/19, stakeholder consultation was carried out and external stakeholders was aware of complaint/request book at office.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.  - <b>Major compliance</b> -	Complaints and resolutions has been documented and made available to affected stakeholders upon request. Seen complaint and requests book available from 2013 more than 24 months.	Yes
<b>Criterion 4.4.3:</b> Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities.  - <b>Minor compliance</b> -	<p><u>Kulai Besar</u> Growers contributes to local development in consultation with the local communities such as donation to school and Hari Raya celebration / buka puasa.</p> <p><u>Tanah Merah</u> Growers are contributing to local development in consultation with the local communities such as cleaning of school field (Jan 19), school prize giving day 2018, donation to temple and sports day 2018. Matriculation college visit and talk Jan 18.</p> <p><u>Tebong</u> Growers are contributing to local development in consultation with the local communities as temple celebration donation (RM 200 July18), school camping (RM 300 Oct 2018) and school PIBG (RM 200 Feb 2018).</p>	Yes
<b>Criterion 4.4.4:</b> Employees safety and health			

Criterion / Indicator		Assessment Findings	Compliance
4.4.4.1	<p>An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>The Occupational Safety And Health Policy was established, signed by President and Chief Operating Officer on 1<sup>st</sup> July 2015. The policy was communicated during Policy briefing from time to time. The policy was displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH personnel from Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees &amp; contractors &amp; visitors. In interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the policy.</p>	Yes
4.4.4.2	<p>The occupational safety and health plan shall cover the following:</p> <p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risks of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <ul style="list-style-type: none"> <li>i. all employees involved shall be adequately trained on safe working practices</li> <li>ii. all precautions attached to products shall be properly observed and applied</li> </ul> <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p>	<p>a) The Occupational Safety and Health Policy was established, signed by President and Chief Operating Officer on 1<sup>st</sup> July 2015. The policy was communicated during Policy briefing e.g. on 8/10/2018 (GTME) and 17/1/2018 (Tebong Estate).</p> <p>b) CHRA was conducted on 24-30/4/2017 (GTME) which was conducted by QMSPRO Sdn Bad (JKKP HIE 127/171-2(154)). SOP for HIRARC was established. The technique was described accordingly in the SOP. The HIRARC was reviewed from time to time to include all the activities involved with pregnant workers for general work, e.g.: planting mucuna, de-creeping and EFB applications.</p> <p>c) Training matrix was established by the management. A formal training programme on all aspects of MSPO requirement has been established and implemented. The training program for 2019 includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to workers.</p>	Yes



Criterion / Indicator	Assessment Findings	Compliance
<p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>d) The estates provide PPE to the employees relevant to the work handled by the workers. The list of PPE that were provided by the estates are as below:</p> <ul style="list-style-type: none"> <li>i. Harvester- Safety Helmet, Sickle Cover, Hand Glove. Wellington Boots</li> <li>ii. Sprayers- Respirator, Nitrile Glove (Chemical Resistant) Goggles, Wellington Boots, Apron.</li> <li>iii. Manuring- Apron, Wellington Boots, Dust Mask</li> </ul> <p>Records of PPE issuance for all the visited estates were verified</p> <p>e) SOP for chemical management (Rev 3, Dated Oct 2013) was established. Register of Chemical was sighted to include the entire chemical used in the estate such as Ken Amine, Ken Glyphosate, Ally 20DF, Basta 15, Impact 75, Promax and etc.</p> <p>f) At all the visited estate, there were OSH Coordinators who were responsible for organising safety training, meetings and investigation and reporting of accidents and Incidents. SHC Organization – Chairman : Estate Manager, SHC secretary: OSH coordinator</p> <p>g) Records were available confirming that quarterly OSH meetings had been held at all the visited estates, e.g. at GTBE, in 2018 meetings were conducted on 21/3/2018, 23/5/2018, 24/8/2018 and 22/11/2018</p> <p>h) The Estates has site specific Plans in the OSH Manual (OM-GPB-04, Rev:0, Dated 1/1/10) including ERP for accident, ERP for Fire, ERP for chemical spillage, maps showing assembly areas and up-to-date lists of emergency contacts with training conducted to communicate the Plan. Latest fire drill was conducted at GTBE on 1/3/2018.</p>	

Criterion / Indicator		Assessment Findings	Compliance
		<p>i) First Aid Kits were given to the head of gang for each activities (e.g.: harvesting, spraying, manuring) and inspection confirmed these had been appropriately stocked. First aid kits were also found to be available at other work stations such as office, AP Post, Chemical Store, Fertiliser Store and workshop to name a few. First aid training records as follows were verified:</p> <ul style="list-style-type: none"> <li>- BOFA</li> <li>- GTBE – conducted by HA on 4/12/2018, attended by 14 participants</li> </ul> <p>j) All accidents are investigated and reported to Head Office. All the records related to accident were available at Estate office. The HIRARC was reviewed accordingly at each of the visited estates. Submission of JKKP 6 form to DOSH were also consistently implemented which is required by legal.</p> <p>Medical surveillance for GTME was done on 11/1/2019, the result from the OHD (Mobile OHD Services) showed that all of the 25 workers from various types of work e.g. spraying, fertiliser application, workshop, etc. were fit to work.</p> <p>At GTBE, last annual medical surveillance was conducted on 18, 21 &amp; 24/5/2018 by OHD (Reg. # HQ/08/DOC/00/503) – attended by 44 workers from various work stations i.e. weed sprayers, manuring, workshop, storekeeper, tractor driver for spraying &amp; manuring and field supervisor – all the workers found to be fit for work.</p>	
<b>Criterion 4.4.5: Employment conditions</b>			
<b>4.4.5.1</b>	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The	The management has establish policy on good social practices regarding human rights in respect of industrial harmony dated 22/06/2015 and signed by top management Mr. Yong Chee Kong.	Yes

Criterion / Indicator		Assessment Findings	Compliance
	<p>policy shall be signed by the top management and effectively communicated to the employees.</p> <p><b>- Major compliance -</b></p>		
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p><b>- Major compliance -</b></p>	<p>The management has not engaged in or support discriminatory practices and has provided equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics as stated in Social Policy dated 22/06/2015.</p> <p>Based on interviews with workers, there is no different treatment between Malaysian worker and foreign workers.</p>	Yes
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>Management has ensured that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreement NUPW 2015 and Minimum Wage Order 2018 and the employees are paid minimum wage– RM1,100 as per Minimum Wages Order 2018.</p>	Yes
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p><b>- Minor compliance -</b></p>	<p>Management ensures employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>However, at Tebong Estate, Management has failed to ensure employees of contractors are paid based on legal minimum wage regulation 2016 (minimum RM1, 000). Short payment to workers from August to December 2018 but only detected by estate management in December 2018. Failure of ensuring mechanism on contractor. Thus, a non-conformity report was assigned due to this lapse.</p>	No

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Contractor: Chew Hin Enterprise contract dated 1/1/19 signed by both parties.</p> <p>Contractor worker : Parmin has been short paid in October by RM 107.69 but the contractor pay slip given &amp; signed by Parmin is RM 1142.31</p> <p>Sahlan (B 4121373) - interview with Sahlan during stakeholder consultation, he stated that he has been paid less than the amount of work he does. And his pay slip for Sept and Oct 2018 was not signed by Sahlan; showing that he might not have been shown the pay slip.</p> <p>The same scenario sighted for Hu Kim Soon and Thavarajan Enterprise for August to December 2018.</p>	
<b>4.4.5.5</b>	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p><b>- Major compliance -</b></p>	<p>The management has establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records contain full names, gender and date of birth, date of entry, identification/passport number, age, a job description, wage and the period of employment.</p> <p>List of workers demographic dated 30 Jan 2019 with all relevant details: full names, gender, date of birth, date joined, passport no, and permit expiry date, job, wages, period of employment and nationality was available.</p>	Yes
<b>4.4.5.6</b>	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>The management has establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records contain full names, gender, date of birth, date of entry, identification/passport number, age, a job description, wage and the period of employment</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		<p><u>Kulai Besar</u>            Contract is available and signed by employee and local management. Employee Samroni (Passport No: 82899831) employed 14/03/2012; signed by estate manager and worker.            Employee interviewed states that he has received a copy.</p> <p><u>Tanah Merah</u>            Contract of Wartono dated 5/1/2019 was available and signed by employee and employer. Contract was kept in the personal file and during consultation, Wartono said that he has received a copy of contract.</p> <p><u>Tebong</u>            All employees are provided with fair contracts that have been signed by both employee and employer. Contract is available and signed by employee Bapari Mohamad Kowsar and Sandran with estate management and retained in personnel file.            Employee Bapari and Sandran interviewed states that he has received a copy.</p>	
<b>4.4.5.7</b>	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.  - Major compliance -	The management has establish a time recording system, check roll system that makes working hours and overtime transparent for both employees and employer. Check roll is used for workers to calculate work done on normal, rest day, public holiday and overtime.	Yes
<b>4.4.5.8</b>	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations	The working hours and breaks of each individual employee as indicated in the time records/check roll complies with legal regulations	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	<p>and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p> <p><b>- Major compliance -</b></p>	<p>and NUPW collective agreements. Working hours are from 6.30am – 2.30pm and rest time 10.00am – 10.30am but flexibility exercised by worker to take 30 minutes at different time Working hours are from 6.30am – 2.30pm and rest time 10.00am – 10.30am.</p> <p>Overtime is agreed by workers and compensation is included in the salary slip, Any rest day is 2x rate.</p>	
<b>4.4.5.9</b>	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p><b>- Major compliance -</b></p>	<p>Wages and overtime payment documented on the pay slips is in line with legal regulations and collective agreements Pay slips states wages, allowance, reimbursements and overtime clearly and deductions Pay slips states wages, allowance, reimbursements and overtime clearly and deductions.</p>	Yes
<b>4.4.5.10</b>	<p>Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.</p> <p><b>- Minor compliance -</b></p>	<p>Other forms of social benefits is offered by the employer to employees, their families or the community such as subsidy for electricity and water medical treatment is provided by estate health assistant and any hospitalization is sent to government hospital.</p>	Yes
<b>4.4.5.11</b>	<p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p><b>- Major compliance -</b></p>	<p>Housing is provided as per Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) with houses 2 or 3 rooms and toilet facilities. Each room is occupied by 2 workers.</p> <p>Utilities like water, electricity and sewage service were provided for free. If the electricity and water usage is exceeding RM30, then the employee will be charged for the additional as per agreed letter by JTK. Rubbish collection alternate days is provided.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
<b>4.4.5.12</b>	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p><b>- Major compliance -</b></p>	<p>The management has establish a policy and provide procedure SMP-GPB- 20 dated 11/10/13 to prevent all forms of sexual harassment and violence at the workplace. Sexual Harassment Policy dated 22/06/15 available. Gender committee is set up at each estate and interview with the members of gender committee revealed that there has been no case of sexual harassment.</p>	Yes
<b>4.4.5.13</b>	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p><b>- Major compliance -</b></p>	<p>The management has respected the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Freedom to join union is stated in People Policy dated 3/10/2009. Interview with employees revealed that there is no restriction from the management for employees to join trade union.</p>	Yes
<b>4.4.5.14</b>	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.</p> <p><b>- Major compliance -</b></p>	<p>Children and young persons are not employed or exploited. Legal Requirement Register has been updated SMP-GMP-22 dated 23/01/19 (rev 06) to reflect the minimum age for Genting Plantations is 18 years old.</p> <p>Employment database Lintramax – has been established to disallow any employment below 18 years.</p> <p>Examination of workers list shows no employment of any below 18 years old.</p>	Yes

Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept. <b>- Major compliance -</b>	Training matrix and training programme for 2019 was established by the estates' management. Evidence of adequate and appropriate training on safe working practices provided to workers was sighted.	Yes
<b>4.4.6.2</b>	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. <b>- Major compliance -</b>	Similar method for identifying the training needs are used in all the visited estates and mill. The training needs for the estates for the FY 2019 training program has been established. The details of the training needs include categories of job descriptions, sections, and employees group. Among the subjects covered were those related to environment, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training, field activities, equipment handling, vehicles maintenance etc.	Yes
<b>4.4.6.3</b>	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure. <b>- Minor compliance -</b>	The training program for 2019 includes training for all categories of workers and contractors. Training program are made on annual basis. In addition it is subject to review during the financial year should need arises.	Yes
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			



Criterion / Indicator		Assessment Findings	Compliance
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.  - <b>Major compliance</b> -	Environmental Policy was established, signed by President and Chief Operating Officer on 5 <sup>th</sup> October 2009. Communication of the policy was delivered in various methods such as display at strategic places, briefing during muster and trainings.	Yes
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations.  - <b>Major compliance</b> -	Environmental management plan was established at all the visited estates which include environmental policy, aspect impact, protection of HCV areas, air pollution, water pollution, noise pollution, GHG, waste management, water usage, etc. Environmental objectives were established through the management plan, e.g. no open burning, improve efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage and reduce wastage for water consumption etc.  Environmental aspect impact assessment was established to include all the activities, e.g. spraying, manuring, harvesting, pruning, EFB application, chemical store activity, internal transport, upkeep & maintenance work, workshop, line site, water catchment pond, HCV, chemical mixing bay, landfill, nursery and etc.	Yes
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.  - <b>Major compliance</b> -	Environmental management plan was established at all the visited estates which include environmental policy, aspect impact, protection of HCV areas, air pollution, water pollution, noise pollution, GHG, waste management, water usage and etc. Environmental objectives were established through the management plan, e.g. no open burning, improve efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage and reduce wastage for water consumption etc. This management plan was monitored on monthly basis.	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. <b>- Minor compliance -</b>	A programme to promote the positive impact was included in the environmental management plan e.g. EFB & POME application in the field where the positive impact is enriching the soil nutrients.	Yes
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. <b>- Major compliance -</b>	Awareness and training programme related to environment management and policy was implemented through various methods such as trainings, meetings and briefing during muster call.	Yes
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. <b>- Major compliance -</b>	Meetings were held mainly incorporated with safety meetings which were conducted quarterly. Apart from that concerns about environmental quality can also be channelled by the workers to the management during muster call.	Yes
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>			
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. <b>- Major compliance -</b>	Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored in order to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement.	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.  - Major compliance -	The estimation of direct usage of non-renewable energy (diesel & petrol) for operations to determine energy efficiency of their operations inclusive of fuel use by contractors (transport & machinery) was available in the estate annual budgets.	Yes
4.5.2.3	The use of renewable energy should be applied where possible.  - Minor compliance -	There was no opportunity to use renewable energy at all the visited estates.	Yes
<b>Criterion 4.5.3: Waste management and disposal</b>			
4.5.3.1	All waste products and sources of pollution shall be identified and documented.  - Major compliance -	Identification, segregation and storage of waste was established where source of wastes at workshop, line site, office, diesel tank, chemical store, fertilizer store, empty fertilizer bag store, empty container store, petrol/lubricant store, scheduled waste store, general store, mist blower store, premix area, clinic, shops, religious area, landfill area, recyclable waste store, vehicle garage and nursery were included.	Yes
4.5.3.2	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:  a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products  - Major compliance -	Waste management plan was established by the estates to include pollution source, mitigation plan and monitoring e.g. source of waste and mitigation plan at workshop, line site, office, diesel tank, chemical store, fertilizer store, empty fertilizer bag store, empty container store, petrol/lubricant store, scheduled waste store, general store, mist blower store, premix area, clinic, shops, religious area, landfill area, recyclable waste store, vehicle garage and nursery.	Yes

Criterion / Indicator		Assessment Findings	Compliance
<b>4.5.3.3</b>	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p><b>- Major compliance -</b></p>	<p>The procedure was established (Scheduled waste management, SMP-GPB-11, Rev 0, Dated 11/10/2013). Scheduled wastes were sent to authorised collectors such as Kualiti Alam and Southern Strength. Verified consignment notes at GKBE e.g. # 2019011012MR2OAE, 2018122011ZX980 and 2018122011NSFYVD. Verification of 5<sup>th</sup> Schedule records, showed that SW were not kept more than 180 days.</p>	Yes
<b>4.5.3.4</b>	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p><b>- Major compliance -</b></p>	<p>Empty pesticide containers were triple rinsed and punctured before sent to authorised collector such as G-Planter. Receipt of deliveries were available at the estates for verification.</p>	Yes
<b>4.5.3.5</b>	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p><b>- Minor compliance -</b></p>	<p>Domestic wastes were disposed at landfill inside the estates. Method of landfilling is guided by Landfill and domestic waste management procedure [SMP-GPB-12, Rev 01, dated 1/12/2014]. Based on site visits, the establishment of the landfill was in accordance to the procedure and no presence of toxic wastes observed.</p>	Yes
<b>Criterion 4.5.4: Reduction of pollution and emission</b>			
<b>4.5.4.1</b>	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.</p> <p><b>- Major compliance -</b></p>	<p>Environmental management plan was established at all the visited estates which include environmental policy, aspect impact, protection of HCV areas, air pollution, water pollution, noise pollution, GHG, waste management, water usage and etc. Environmental objectives were established through the management plan, e.g. no open burning,</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		improve efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage and reduce wastage for water consumption etc. This management plan was monitored on monthly basis.	
<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented.  - <b>Major compliance</b> -	Environmental management plan was established at all the visited estates which include environmental policy, aspect impact, protection of HCV areas, air pollution, water pollution, noise pollution, GHG, waste management, water usage and etc. Environmental objectives were established through the management plan, e.g. no open burning, improve efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage and reduce wastage for water consumption etc. This management plan was monitored on monthly basis.	Yes
<b>Criterion 4.5.5: Natural water resources</b>			
<b>4.5.5.1</b>	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:  a. Assessment of water usage and sources of supply.  b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.  c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application,	Water management plan was established at all the visited estates which included water pollution, water quality, drainage system, flood/water log, assessment of water usage, drought season with latest review made on 5/9/2018. The plan emphasized on the following areas. <ul style="list-style-type: none"> <li>a) Water source</li> <li>b) Efficient use of water</li> <li>c) Renewability of water source</li> <li>d) Avoidance of surface and ground water contamination</li> </ul> Details of the action plan and monitoring among others are described as follows:	No

Criterion / Indicator		Assessment Findings		Compliance																																		
<p>maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p><b>- Major compliance -</b></p>	<table border="1"> <thead> <tr> <th></th> <th>Areas of concerns</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1</td> <td rowspan="2">Water source</td> <td>Government Treated Water</td> <td>Supply to residential areas /complex for all divisions</td> </tr> <tr> <td>Water from catchment pond</td> <td>Use in nursery and irrigation projects</td> </tr> <tr> <td rowspan="4">2</td> <td rowspan="4">Efficient use of water</td> <td>Residential areas</td> <td>Monitoring of pipes leakages</td> </tr> <tr> <td>Optimize usage &amp; reduce wastage</td> <td>Spraying pump maintenance</td> </tr> <tr> <td>Nursery water usage</td> <td>To ensure: <ul style="list-style-type: none"> <li>- monitor water usage for irrigation</li> <li>- pipe maintenance</li> <li>- watering base SOP</li> </ul> </td> </tr> <tr> <td>Education/training</td> <td>Promote water conservation &amp; awareness among employees</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">Renewability water source</td> <td>Rain water capture at catchment</td> <td>Monitoring of pond level</td> </tr> <tr> <td>Rain water harvest</td> <td>Collection and usage at workshop</td> </tr> <tr> <td rowspan="4">4</td> <td rowspan="4">Avoidance of surface/ground water contamination</td> <td>Sewage and septic tank</td> <td>To ensure no leakage of sewage/septic tank functioning properly/cover available</td> </tr> <tr> <td>Rubbish collection at line site</td> <td>Collection 3x/week Landfill located 100m from residential areas. Recycling practices</td> </tr> <tr> <td>Drainage system</td> <td>Free flow drains &amp; scheduled maintenance</td> </tr> <tr> <td>Water pollution</td> <td>Wash from chemical bays collected in sump for recycling Trap for oil constructed</td> </tr> </tbody> </table>			Areas of concerns	Action Plan	1	Water source	Government Treated Water	Supply to residential areas /complex for all divisions	Water from catchment pond	Use in nursery and irrigation projects	2	Efficient use of water	Residential areas	Monitoring of pipes leakages	Optimize usage & reduce wastage	Spraying pump maintenance	Nursery water usage	To ensure: <ul style="list-style-type: none"> <li>- monitor water usage for irrigation</li> <li>- pipe maintenance</li> <li>- watering base SOP</li> </ul>	Education/training	Promote water conservation & awareness among employees	3	Renewability water source	Rain water capture at catchment	Monitoring of pond level	Rain water harvest	Collection and usage at workshop	4	Avoidance of surface/ground water contamination	Sewage and septic tank	To ensure no leakage of sewage/septic tank functioning properly/cover available	Rubbish collection at line site	Collection 3x/week Landfill located 100m from residential areas. Recycling practices	Drainage system	Free flow drains & scheduled maintenance	Water pollution	Wash from chemical bays collected in sump for recycling Trap for oil constructed	
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		<p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones as commonly practiced within the industry. The buffer zones established are as follows:</p> <table border="1"> <thead> <tr> <th>River width (Meters)</th> <th>Buffer Zone (Meters)</th> </tr> </thead> <tbody> <tr> <td>&gt;40</td> <td>50</td> </tr> <tr> <td>20-40</td> <td>40</td> </tr> <tr> <td>10-20</td> <td>20</td> </tr> </tbody> </table>		River width (Meters)	Buffer Zone (Meters)	>40	50	20-40	40	10-20	20			
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Criterion / Indicator		Assessment Findings		Compliance
		5-10	10	
		<5	5	
		<p>The river water quality analysis was regularly conducted according to the procedure e.g.:</p> <ul style="list-style-type: none"> <li>- on 16/8/2018 at GKBN [ref.: report no. JB/WE/2452/18 (inlet 1), JB/WE/2453/18 (inlet 2) and JB/WE/2454/18 (outlet)]</li> <li>- on 11/1/2018, report no. ER02/2018 and 29/6/2018, report no. ER03/2018 at GTME</li> </ul> <p>The report shown that the water quality between upstream and downstream sampling points does not show significant differences and were within limit (as per national water quality standards for Malaysia, Class III). The analysis was done by an accredited laboratory (SAMM No. 180 for GKBN and SAMM No. 635 for GTME). Among the parameters analysed were pH, COD, BOD, SS, AN, P and DO.</p> <p>Nonetheless, during site visit at Field No. 11A at GKBN, it was found no demarcation of buffer zone and trace of spraying observed at the oil palm row next to the river bank. Thus a non-conformity report was assigned due to this lapse.</p>		
<b>4.5.5.2</b>	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p><b>- Minor compliance -</b></p>	<p>There is no construction of bunds, weirs and dams across main rivers or waterways passing through all the visited estates.</p>		Yes



Criterion / Indicator		Assessment Findings	Compliance
<b>4.5.5.3</b>	<p>Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).</p> <p><b>- Minor compliance -</b></p>	<p>The management established silt pit, water conservation pit and water retention pond in the estates. During the site visit practices of rain water harvesting was noted mainly constructed in flat areas. There were construction of WCP = Water Conservation Pit ratio of 1 ha to 34 points. Road side pits were also available at every 3 palm rows, to divert in event of water overflowing and also to benefit the nearest palm at the pit end to obtain additional moisture. This is part of the common practices introduced within the Group Agriculture Procedures. In addition there were irrigation projects for both Estates. Potential fields have been identified and such areas will be irrigated to improve the moisture level for the palm growth.</p>	Yes
<b>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</b>			
<b>4.5.6.1</b>	<p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</p> <p><b>- Major compliance -</b></p>	<p>The assessment namely, "Inventory on HCV sites within Genting Plantation Bhd group estates (Central Region)" by a consultant in Feb-Mar 2010. Only HCV 1.4, HCV 4.2 and HCV 6 were identified at GTME and GSGE. E.g.: steep area, rocky area, temple and cemetery.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
<b>4.5.6.2</b>	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p><b>- Major compliance -</b></p>	<p>Based on the report, no RTE was detected. Nonetheless, hunting is not encourage through:</p> <ul style="list-style-type: none"> <li>- restriction of hunting signage</li> <li>- briefing with stakeholder during consultation – verified presentation slides and attendance record dated 24/10/2018, participated by 20 persons e.g. from SMK Sagil, Tangkah Land Office, IOI Sagil Estate, IPD Tangkak, Kolej Matrikulasi, Tangkak Fire Dept. and local communities to name a few</li> <li>- briefing to workers – verified training records dated 25/2/2018, attended by 11 participants from security department (i.e. Auxiliary Police and Security Guards) at GTME</li> </ul>	Yes
<b>4.5.6.3</b>	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p><b>- Major compliance -</b></p>	<p>A management plan has been established by all the visited estates which was updated from time to time. Among the management action to be taken were patrolling, conduct training and awareness and maintenance of signage. HCV Monitoring Checklist was available for verification.</p>	Yes
<b>Criterion 4.5.7: Zero burning practices</b>			
<b>4.5.7.1</b>	<p>Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.</p> <p><b>- Major compliance -</b></p>	<p>There was no trace of fire used for waste disposal and for preparing land for oil palm cultivation or replanting observed at all the visited estates.</p>	Yes
<b>4.5.7.2</b>	<p>A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where</p>	<p>NA as fire was not used for any field operations.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
	there is a significant risk of disease spread or continuation into the next crop. <b>- Major compliance -</b>		
<b>4.5.7.3</b>	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. <b>- Major compliance -</b>	NA as fire was not used for any field operations.	Yes
<b>4.5.7.4</b>	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. <b>- Minor compliance -</b>	Based on visits at the replanting areas, previous crops were observed to be felled, chipped and windrowed. No trace of burning observed.	Yes
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Site Management</b>			
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. <b>- Major compliance -</b>	Genting Plantations Berhad has well established GENP's Oil Palm Manual for monitoring and control of best practice implementation at the estates. There were 13 manuals which cover the operation from land clearing to harvesting and evacuation.	Yes
<b>4.6.1.2</b>	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of	Genting Plantations Berhad has developed Steep Land Management Procedure with Doc. No. SMP-GPB-10, Rev. 0 and Soil Conservation and Terracing SOP with Doc. No. OPM 4, Rev. June 2013. Seen the Slope map with GIS Date Processed: 19/6/2013 of Genting Tanah Merah Estate and Genting Tebong Estate as below;	Yes

Criterion / Indicator		Assessment Findings			Compliance																												
	<p>either soil, nutrients or chemicals.</p> <p><b>- Major compliance -</b></p>	<table border="1"> <thead> <tr> <th>Estate</th> <th>Slop Degree</th> <th>Area/ Percentage</th> </tr> </thead> <tbody> <tr> <td rowspan="6">Genting Tanah Merah Estate</td> <td>0° - 6°</td> <td>1643.51 ha/ 92.66%</td> </tr> <tr> <td>6° - 10°</td> <td>79.20 ha/ 4.47%</td> </tr> <tr> <td>10° - 15°</td> <td>32.56 ha/ 1.84%</td> </tr> <tr> <td>15° - 20°</td> <td>14.77 ha/ 0.83%</td> </tr> <tr> <td>20° - 25°</td> <td>3.58 ha/ 0.20%</td> </tr> <tr> <td>&gt;25°</td> <td>0.10 ha/ 0.01%</td> </tr> <tr> <td rowspan="6">Genting Tebong Estate</td> <td>0° - 6°</td> <td>1,405.99 ha/89.53%</td> </tr> <tr> <td>6° - 10°</td> <td>130.21 ha/8.29%</td> </tr> <tr> <td>10° - 15°</td> <td>27.43 ha/1.74%</td> </tr> <tr> <td>15° - 20°</td> <td>5 Ha/0.32%</td> </tr> <tr> <td>20° - 25°</td> <td>1.82 ha/ 0.12%</td> </tr> <tr> <td>&gt; 25°</td> <td>0</td> </tr> </tbody> </table>	Estate	Slop Degree	Area/ Percentage	Genting Tanah Merah Estate	0° - 6°	1643.51 ha/ 92.66%	6° - 10°	79.20 ha/ 4.47%	10° - 15°	32.56 ha/ 1.84%	15° - 20°	14.77 ha/ 0.83%	20° - 25°	3.58 ha/ 0.20%	>25°	0.10 ha/ 0.01%	Genting Tebong Estate	0° - 6°	1,405.99 ha/89.53%	6° - 10°	130.21 ha/8.29%	10° - 15°	27.43 ha/1.74%	15° - 20°	5 Ha/0.32%	20° - 25°	1.82 ha/ 0.12%	> 25°	0		
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<b>4.6.1.3</b>	<p>A visual identification or reference system shall be established for each field.</p> <p><b>- Major compliance -</b></p>	<p>All fields are marked and identified. Information like year planting (field no) and the total hectare is shown in all markers. There are both stencilled at the palm trees and also displayed in signage at the boundary/corners of every fields. This is observed during the field visit at all the estates.</p>			Yes																												
<b>Criterion 4.6.2: Economic and financial viability plan</b>																																	
<b>4.6.2.1</b>	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p><b>- Major compliance -</b></p>	<p>Documented Business plan/budget were available on both Estates for 2019 and projections until 2024. Attention was given to crop projection, cost of production, cost per ton and per hectare. The cost of production was reviewed and compared against expenditure each year with projections in place for future years.</p>			Yes																												

Criterion / Indicator		Assessment Findings	Compliance																													
4.6.2.2	<p>Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years.</p> <p><b>- Major compliance -</b></p>	<p>Replanting programmes were available at all the visited estates The programmes projected for 5 years. All replanting program and planning in all the Group Estates are monitored by the Head Office. Assistance and visits are performed by SVP/GM for the approval of hectares and stand per ha.</p> <table border="1"> <thead> <tr> <th rowspan="2">Estates</th> <th colspan="5">Ha/year</th> </tr> <tr> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>GKBE</td> <td>171.59</td> <td>126.47</td> <td>164.73</td> <td>165.47</td> <td>108.55</td> </tr> <tr> <td>GTME</td> <td>119.44</td> <td>135.63</td> <td>55.01</td> <td>164.30</td> <td>86.46</td> </tr> <tr> <td>GTBE</td> <td>129.52</td> <td>127.79</td> <td>263.97</td> <td>30.17</td> <td>103.33</td> </tr> </tbody> </table>	Estates	Ha/year					2019	2020	2021	2022	2023	GKBE	171.59	126.47	164.73	165.47	108.55	GTME	119.44	135.63	55.01	164.30	86.46	GTBE	129.52	127.79	263.97	30.17	103.33	Yes
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4.6.2.3	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> <li>a) Attention to quality of planting materials and FFB</li> <li>b) Crop projection: site yield potential, age profile, FFB yield trends</li> <li>c) Cost of production : cost per tonne of FFB</li> <li>d) Price forecast</li> <li>e) Financial indicators : cost benefit, discounted cash flow, return on investment</li> </ul> <p><b>- Major compliance -</b></p>	<p>The business and management plan for all the visited estates were available in annual budget with 5 years projection. Among the information available in the budget were crop projection and operation cost.</p>	Yes																													
4.6.2.4	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p>	<p>The management will have meetings from time to time to monitor the work progress against annual programme to ensure the budget is not overrun.</p>	Yes																													

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. <b>- Major compliance -</b>	<p><u>Kulai Besar</u></p> <p>Pricing mechanisms for the products and other services are documented in contracts and purchase orders and effectively implemented. Services of contract workers hired and with contracts and contract is documented. Backhoe services is also hired with one year contract which is documented and signed by both contractor and management such as Morthy Enterprise and Vimesh Enterprise.</p> <p><u>Tanah Merah</u></p> <p>Pricing mechanisms for the products and other services are documented in contracts and purchase orders and effectively implemented. Apeng Resources contract is negotiated yearly and current contact 1/1 – 3/12/19 and signed by both contractor and management.</p> <p><u>Tebong</u></p> <p>Pricing mechanisms for the products and other services are documented in contracts and purchase orders and effectively implemented .Services of contractor of harvesting workers Thavarajen and Chien Han Yuan has documented contracts. Contract is for one year and signed by 01/01/19 by both contractor and management.</p>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	All contracts are fair, legal and transparent and agreed payments shall be made in timely manner Payment is done timely by 10 - 14th of each month and signed by contractor/service provider. Payment is done on timely manner and signed by contractor/service provider.	Yes
<b>Criterion 4.6.4: Contractor</b>			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. <b>- Major compliance -</b>	<p><u>Kulai Besar</u></p> <p>MSPO Policy is displayed and explained to contractors during external stakeholders meeting A new contractor will receive a letter to explain MSPO and relevant policies.</p> <p>Stakeholder consultation explains MSPO policy and requirements dated October 2018.</p> <p><u>Tanah Merah</u></p> <p>MSPO explanation to contractors was carried out during internal and external stakeholders meetings; slides and meeting minutes sighted.</p> <p>During interview, the stakeholders such as Tok Batin and Lau Kian Hong were not clear to explain on MSPO.</p> <p><u>Tebong</u></p> <p>MSPO Policy is displayed and explained to contractors during external stakeholders meeting.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		<p>Internal contractors such as harvesting contractor, frequent internal meeting are conducted 22/12/18 and 7/1/19 and MSPO slides explained.</p> <p>A new contractor will receive a letter to explain MSPO and relevant policies.</p> <p>Interview with Thavarajen (Harvesting contractor) during audit shows that he has basic understanding on MSPO and policies.</p>	
<b>4.6.4.2</b>	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p><b>- Major compliance -</b></p>	<p><u>Kulai Besar</u></p> <p>The management has evidence of agreed contracts with the contractor. Morthy Enterprise signed a contract with Genting Kulai Besar Estate dated 01/01/2019 available. Expiring 31/12/2019.</p> <p><u>Tanah Merah</u></p> <p>The management has evidence of agreed contracts with the contractor. Contract No: GTME/GWO19/03AR Apeng Resources for a year 1/1 – 31/12/19. Signed by Mr. Tan and management (En Amer). Contract VJK Maju Enterprise renewed 1/1/19 till 31/12/19.</p> <p><u>Tebong</u></p> <p>The management has evidence of agreed contracts with the contractor. Contractor agreement GTBE and Thavarajan Enterprise for harvesting was signed by both parties on 1/1/19. Contractor has been given a copy and verified during interview.</p>	Yes



Criterion / Indicator		Assessment Findings	Compliance
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. <b>- Minor compliance -</b>	The management shall has accept MSPO approved auditors such as BSI to verify assessments through a physical inspection if required BSI audit schedule Feb 2019 has been agreed by Estate Management.	Yes
<b>4.6.4.4</b>	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. <b>- Major compliance -</b>	The management has been observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. Daily work of contractor is reported and a monthly summary by contractor and verified by Estate Management for each task is done.  Contract explains the control points i.e. safety PPE, disposal of waste, no burning, no hunting, no minors employed (below 18 years) , living wages meeting local legislation, no forced labour, housing ,water and electricity etc.	Yes
<b>4.7 Principle 7: Development of new planting</b>			
<b>Criterion 4.7.1: High biodiversity value</b>			
<b>4.7.1.1</b>	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. <b>- Major compliance -</b>	There is no development of new planting at all of the visited estates.	Yes
<b>4.7.1.2</b>	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and	There is no development of new planting at all of the visited estates.	Yes

Criterion / Indicator		Assessment Findings	Compliance
	<p>Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required.</p> <p><b>- Major compliance -</b></p>		
<b>Criterion 4.7.2: Peat Land</b>			
<b>4.7.2.1</b>	<p>New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice.</p> <p><b>- Major compliance -</b></p>	There is no development of new planting at all of the visited estates.	Yes
<b>Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)</b>			
<b>4.7.3.1</b>	<p>A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations.</p> <p><b>- Major compliance -</b></p>	There is no development of new planting at all of the visited estates.	NA
<b>4.7.3.2</b>	<p>SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders.</p> <p><b>- Major compliance -</b></p>	There is no development of new planting at all of the visited estates.	NA

Criterion / Indicator		Assessment Findings	Compliance
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. <b>- Major compliance -</b>	There is no development of new planting at all of the visited estates.	NA
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. <b>- Minor compliance -</b>	There is no development of new planting at all of the visited estates.	NA
<b>Criterion 4.7.4:</b> Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. <b>- Major compliance -</b>	There is no development of new planting at all of the visited estates.	NA
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. <b>- Major compliance -</b>	There is no development of new planting at all of the visited estates.	NA
<b>Criterion 4.7.5:</b> Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national	There is no development of new planting at all of the visited estates.	NA

Criterion / Indicator		Assessment Findings	Compliance
	laws. - <b>Major compliance</b> -		
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - <b>Major compliance</b> -	There is no development of new planting at all of the visited estates.	NA
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - <b>Major compliance</b> -	There is no development of new planting at all of the visited estates.	NA
<b>Criterion 4.7.6: Customary land</b>			
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - <b>Major compliance</b> -	There is no development of new planting at all of the visited estates.	NA
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - <b>Minor compliance</b> -	There is no development of new planting at all of the visited estates.	NA

Criterion / Indicator		Assessment Findings	Compliance
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. <b>- Major compliance -</b>	There is no development of new planting at all of the visited estates.	NA
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. <b>- Major compliance -</b>	There is no development of new planting at all of the visited estates.	NA
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. <b>- Major compliance -</b>	There is no development of new planting at all of the visited estates.	NA
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. <b>- Major compliance -</b>	There is no development of new planting at all of the visited estates.	NA
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. <b>- Major compliance -</b>	There is no development of new planting at all of the visited estates.	NA

Criterion / Indicator	Assessment Findings	Compliance
<p><b>4.7.6.8</b> Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development.</p> <p><b>- Minor compliance -</b></p>	<p>There is no development of new planting at all of the visited estates.</p>	<p>NA</p>

**MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill.**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	Policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	The company has initiated the implementations of MSPO requirements. MSPO Policy has been established and signed by President & Chief Operating Officer dated 18/3/2014.	Yes
<b>4.1.1.2</b>	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. <b>- Major compliance -</b>	The established policy has emphasized on the commitment to continual Improvement within the journey towards achieving sustainable palm oil.	Yes
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	Internal Audit has been conducted on 10-12/12/2018 and 18-20/12/2018 by the Sustainability Manager based in Genting HQ, KL, covering both mill and estates. 23 NCRs were raised as a result of the audit. All of the NCRs have been closed by the lead auditor. Based on the audit report, the root causes were effectively identified for corrective actions establishment.	Yes
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to	Internal Audit procedure is available under SMPM (sustainability management procedure manual), entitled "Sustainability Internal Audit" document no SMP-GPB-03, rev. 4, dated 25 May 2018. Among	Yes

	implement the necessary corrective action. <b>- Major compliance -</b>	the contents covered in the procedure are audit criteria, audit schedule, audit plan, responsibility of lead auditor & auditee and audit report, which to be kept for 10 years.	
<b>4.1.2.3</b>	Reports shall be made available to the management for their review. <b>- Major compliance -</b>	Report of Internal Audit for all the visited estates were made available for review.	Yes
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. <b>- Major compliance -</b>	<p>Management Review procedure was established accordingly, refer to Sustainability Management Procedure Manual (SMP-GPB-06), rev. 1, dated 25/5/2018. The MRM for MSPO was done in January 2019 participated by all the key persons of estates and mill. Among the agenda discussed in the meeting were:</p> <ul style="list-style-type: none"> <li>20) Status of outstanding issues from previous meetings</li> <li>21) Changes, improvement or modification of the sustainability management system (SMS)</li> <li>22) Internal and external audit findings (SMS)</li> <li>23) Complaints and grievance book</li> <li>24) Enquiry register book</li> <li>25) Stakeholder management reports/minutes</li> <li>26) Risk management</li> <li>27) Greenhouse value</li> <li>28) Review continual improvement status &amp; recommendations</li> <li>29) Review on resource &amp; training requirements</li> <li>30) Review on sustainability policy &amp; its objectives status</li> <li>31) Review of effectiveness in achieving QEO objectives</li> <li>32) Compliance status on legal &amp; other requirements</li> <li>33) Other matters</li> <li>34) Preventive &amp; corrective actions</li> </ul>	Yes



		<p>35) Recommendations for improvement            36) Result of internal RSPO SCCS &amp; MSPO SCCS audit            37) Customer feedback</p> <p>Changes that could affect the management system</p>	
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	<p>The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.</p> <p><b>- Major compliance -</b></p>	<p>Sample of Continual Improvement for 2019 at the mill:</p> <ol style="list-style-type: none"> <li>1. To reduce and maintain the black smoke emission within allowable limit i.e. 20%</li> <li>2. To reduce the BOD at final discharge within allowable limit of 100 ppm</li> <li>3. To improve the disludging operation as to minimise impact of effluent wastes/sludge to environmental</li> <li>4. To control water consumption at less than 1.4 m<sup>3</sup>/mt FFB processed</li> <li>5. To reduce genset diesel consumption less than 80,000 lt/year</li> <li>6. To involve and get feedback from surrounding communities and stakeholder on environmental impact to them</li> <li>7. To maintain good relationship with stakeholder and surrounding communities</li> <li>8. To provide better salaries and welfare to workers and family</li> <li>9. To provide adequate safety equipment to employees</li> </ol>	Yes
<b>4.1.4.2</b>	<p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.</p> <p><b>- Major compliance -</b></p>	<p>The new information and techniques to improve practices are obtained mainly through information from communications with suppliers and being members of associations related to palm oil industry (e.g. ISP).</p>	Yes

<b>4.2 Principle 2: Transparency</b>			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
<b>4.2.1.1</b>	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.  - <b>Major compliance</b> -	Management has communicated the information requested by the relevant stakeholders in the appropriate languages by sending letters in English and Malay to new external stakeholder. Internal and external stakeholders consultation carried out does have slides on MSPO and based on stakeholder consultation/interview during audit, understanding on MSPO was acceptable.	Yes
<b>4.2.1.2</b>	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.  - <b>Major compliance</b> -	Management documents are publicly available and policies are displayed in mill and office notice boards .Social Policy, Sustainability Policy, People Policy, MSPO Policy, OSH Policy and Environmental Policy displayed in English and Bahasa Malaysia.	Yes
Criterion 4.2.2 – Transparent method of communication and consultation			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication with the relevant stakeholders.  - <b>Major compliance</b> -	Procedure Consultation and Communication (SMP-GPB-17 dated 23/02/18) has been established and implemented.  Procedure shows flow of various methods of communication i.e. letter, suggestion, post, email, call, complaint and grievance books.	Yes
<b>4.2.2.2</b>	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> .  - <b>Minor compliance</b> -	Management official responsible for consultation and communication is the Mill Manager, En. Mohd Azim as described in SMP-GPB-17.	Yes

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<p><b>4.2.2.3</b></p>	<p>A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained.</p> <p><b>- Major compliance -</b></p>	<p>List of external stakeholders dated 21/01/2019. Invitation letter dated 13 August 18 was sent out to 101 contacts on the external stakeholders list and attendance was 19. Meeting minutes sighted.</p> <p>As for internal stakeholders meeting dated 16/10/18, a total of 17 employees attended including foreign workers – Mohd Abdul Mojid (Indonesian) and Mahron (Bangladesh).</p>	<p>Yes</p>
<p><b>Criterion 4.2.3 – Traceability</b></p>			
<p><b>4.2.3.1</b></p>	<p>The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has developed a Traceability Procedure with Doc. No. SMP-GPB-09, Rev. 02 dated 14/8/2014. The procedure has clearly explained to ensure the handling of outgoing FFB are carried out in proper manner.</p>	<p>Yes</p>
<p><b>4.2.3.2</b></p>	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p><b>- Major compliance -</b></p>	<p>Regular inspections on compliance with the established traceability system were conducted through periodical internal audit as specified in Criterion 4.1.2 of this checklist. Furthermore, a Standard Operating Procedure sighted available that described the routine responsibilities of mill management and staff to conduct related inspections on compliance of all operations including traceability system. Verification on site confirmed the inspections were regularly implemented accordingly.</p>	<p>Yes</p>
<p><b>4.2.3.3</b></p>	<p>The management shall identified and assign suitable employees to implement and maintain traceability system.</p> <p><b>- Minor compliance -</b></p>	<p>The Manager of GAIOM has been appointed by Vice President of Plantation (WM) to be the Management Representative for ISCC, RSPO and MSP0 related matters. The responsibilities of the MR have been clearly stated in the appointment letter.</p>	<p>Yes</p>
<p><b>4.2.3.4</b></p>	<p>Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.</p>	<p>Records of CPO &amp; PK sales &amp; delivery including Weighbridge Tickets together with sales Delivery Note (DO Chit) and Daily Record (Daily</p>	<p>Yes</p>

	- Major compliance -	CPO/PK Despatch Summary Log Book) were maintained based on own established SOP.	
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
<b>4.3.1.1</b>	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.  - Major compliance -	Mill operations are in compliance with the applicable local, state, national and ratified international laws and regulations. Legal Requirement Register (LRR) Document No. SMP-GPB-22 (rev 06) was available for verification.	Yes
<b>4.3.1.2</b>	The management shall list all relevant laws related to their operations in a legal requirements register.  - Major compliance -	Mill operations are in compliance with the applicable local, state, national and ratified international laws and regulations.  Legal Requirement Register (LRR) Document No. SMP-GPB-22 (rev 06 dated 23/01/19) was updated for :  Minimum Wage Order from 2016 to 2018  Employment (restriction) Act 1968 from 2006 to 2017  Employment Insurance System Act 2017	Yes
<b>4.3.1.3</b>	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.  - Major compliance -	Among the newly registered laws were:  - Minimum Wage Order (from 2016 to 2018) - Employment (restriction) Act 1968 (from 2006 to 2017) - Employment Insurance System Act 2017 - Sabah Labour Ordinance Cap 67, 1950 - EQ (Clean Air) Regulations (from 1978 to 2014) - Employees Social Security (Exemption No. 2) Notification 2018	Yes
<b>4.3.1.4</b>	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory	A mechanism for tracking changes in law is guided by SMPM Procedures on Regional, National and International Laws [SMP-GPB-21, rev. 1, 14/4/2014]. Generally the mechanism is by monitoring or	Yes

	requirements. - <b>Minor compliance</b> -	consultation with various sources (e.g. government agencies, electronic & non-electronic media, legal firms, professional bodies, industry association/organization and NGO). The Genting's Systems, Methods, Insurance and Risk Management Department (based in KL) is the person responsible to handle the task.	
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - <b>Major compliance</b> -	Mill is situated in the Genting Sing Mah Estate land and is not diminishing any other users' rights.	Yes
<b>4.3.2.2</b>	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - <b>Major compliance</b> -	Legal land title is for Genting Sing Mah Estate and the mill complex is 4.05 hectares and this is mapped out.	Yes
<b>4.3.2.3</b>	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - <b>Major compliance</b> -	Not applicable since the land title was kept under the estate.	Yes
<b>4.3.2.4</b>	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - <b>Minor compliance</b> -	No issue on land dispute. Land title where the mill is situated belongs to Genting Sing Mah.	Yes

<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. <b>- Major compliance -</b>	Procedure on Conflict Resolution and Handling of Negotiation and Compensations within GENP Estates (SMP-GPB-18) dated 29/12/27 is used in any negotiation. But there is no cases of negotiation as land is estate land and owned by the estate.	Yes
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. <b>- Minor compliance -</b>	Procedure clearly explains on customary rights negotiations but there is no recorded case of negotiation.	Yes
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. <b>- Major compliance -</b>	Procedure on Conflict Resolution and Handling of Negotiation and Compensations covers negotiation and FPIC clearly.	Yes
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. <b>- Minor compliance -</b>	Social Impact Assessment (SMP-GPB-12 dated 18/01/18) conducted on 16-17/01/19 with Sustainability Department. Total employees 102 (61 % foreign workers).  Mitigation action for stakeholder list to be updated with 11 new stakeholders was done on separate document dated 28/1/19.	Yes
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented. <b>- Major compliance -</b>	Procedure Complaints and Grievances (SMP-GPB-19) dated 21/03/2018 has been established. But the procedure is not fully followed where any workers complaints is not recorded in complaint & grievance book since after 2016. A new log book is created and used	No

		but is not clear whether all internal complaints are handled in this manner and this method is not explained in the procedure.	
<b>4.4.2.2</b>	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. <b>- Major compliance -</b>	All complaints handled were agreed and accepted by complainants and evidence of acknowledgement of complainant were also recorded.	Yes
<b>4.4.2.3</b>	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. <b>- Minor compliance -</b>	Complaint & grievance book is available and used on all complaints by employees as per procedure SMP-GPB-17. During stakeholder 12/02/19, employee interviewed does know that there is a complaint book/form and also know that any house repairs, they have to report to office.	Yes
<b>4.4.2.4</b>	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. <b>- Minor compliance -</b>	Under CSR. LCD projector has been given on 29/07/18. Photo log But there is no evidence of the request/letter or recording of the request by mill. School children are for interviewing the Mill Manager to get exposure on the mill activities for their projects, but record of request/meeting/letter.	Yes
<b>4.4.2.5</b>	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. <b>- Major compliance -</b>	For internal stakeholders, the complaint official book has been updated till 2016 and the new log book has been recorded from December 2017 till now.	Yes
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
<b>4.4.3.1</b>	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community	Contribution for local development is carried out in 2018 for school projector to primary school (29/07/18). A Genting Pre Love project was	Yes

	development may be regarded as a joint effort by the mill and the plantation. <b>- Minor compliance -</b>	carried out in 8 April 2018 by collecting clothing from workers and local community and giving it to those who need clothes in the community.	
<b>Criterion 4.4.4: Employees safety and health</b>			
<b>4.4.4.1</b>	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. <b>- Major compliance -</b>		Yes
<b>4.4.4.2</b>	The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).	JKKP8 was last submitted on 24/1/2019 to the DOSH (ref.: JKKP 8/17627/2018)  OSH Plan was established. a) The Occupational Safety and Health Policy was established, signed by President and Chief Operating Officer on 1 <sup>st</sup> July 2015. The policy was communicated during Policy briefing b) CHRA was conducted on 30/5 to 5/7/2018 by QMSPRO Sdn Bad [JKKP HIE 127/171-2(154)]. SOP for HIRARC was established. The technique was described accordingly in the SOP. The HIRARC was reviewed from time to time to include all the activities involved in the mill c) Training matrix was established by the management. A formal training programme on all aspects of MSP0 requirement has been established and implemented. The training program for 2018 includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to workers	Yes



	<p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>d) The mill provides PPE to the employees relevant to the work handled by the workers. The list of PPE provided among others are as below:          General Workers/Workshop Personnel /others          Safety Helmet safety shoes hand gloves, leather gloves, luminous strip /jacket, dust mask Records of PPE issuance were sighted. During the mill site visit workers were observed to be in approved PPE.</p> <p>e) The following manuals contained SOP for chemical handling and used as a procedure in handling chemicals.          Quality, Environmental, Safety &amp; Health Manual &amp; Sustainability Manual dated 01/7/17. Both were issued from Head Office and used in all operating units within the Group.</p> <p>f) The Mill Manager has been appointed as the Chairman of the ESH committee. Inclusive in the Manager's responsibilities are the Management Representative for the roles related to ISCC/RSPO/MSPO and QESHMS i.e. ISO 9001, ISO14001, OHSAS 18001 and MS 1722. The mill engineers/executives take the delegation of similar functions as assigned by the Manager.</p> <p>g) The mill conducts regular two-way communication with its employees through the quarterly OSH meetings. Minutes of meetings were available for verification</p> <p>h) The mill adhered to the requirement of the ERP Procedures in accordance to OSHA 1994 Act 514 Part IV. It is specified in the Mill Manual dated 01/7/2013 – System Procedure page 4 of 10. The series of the ERP Emergency Response Procedure include the following event of crisis;</p> <ul style="list-style-type: none"> <li>- Fire or Explosion</li> <li>- CPO or Chemical Spillage</li> <li>- Effluent Overflow or Bund Collapses</li> <li>- Accidents</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Miscellaneous events which resulted in actual/potential emergency situations. The mill had procedures as stipulated above and display at prominent places in the estates complex in both English and Bahasa Malaysia. The procedures were displayed at the office, Muster Ground, Workshop and Dispensary. Names of the members of the Emergency Response Team (ERT) and their contact numbers were communicated to all employees and displayed at notice boards. Telephone numbers of the nearest police station, Fire Brigade, Immigration Department and Hospital were also included.</li> <li>i) Both estates trained their assigned employees for First Aid mainly those involved in the field operations. Training program on the first Aider was organised on Group basis. The First Aid Kit (box) equipped with approved 16 items were available and replenished on a weekly basis.</li> <li>j) Records of all accidents are kept in the <i>Laporan Statistik Kemalangan Bulanan</i>. The retention time of such records is 10 years minimum. Accident incidences if any are reviewed during safety meetings. Accidents incidences in details from 2011 to 2018 were available for verification</li> </ul>	
<b>Criterion 4.4.5:</b> Employment conditions			
<p><b>4.4.5.1</b></p>	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>Social Policy and Sustainability Management Procedure (SMP-GPB-32) dated 18/01/18 states on social practises of organization ,</p> <p>Social Policy is signed by Top Management Mr Yong Chee Kong 22/06/2015.</p> <p>Sustainability Policies briefing to employees has been conducted on 08/02/2019.</p>	<p>Yes</p>

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<p><b>4.4.5.2</b></p>	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p><b>- Major compliance -</b></p>	<p>Social Policy and Sustainability Management Procedure (SMP-GPB-32) dated 18/01/18 states on equal rights.</p> <p>Social Policy is signed by Top Management Mr Yong Chee Kong 22/06/2015.</p> <p>Interviewed Mia Tareq and he is clear that his basic salary is the same as local worker.</p>	<p>Yes</p>
<p><b>4.4.5.3</b></p>	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>MAPA Collective Agreement dated 1 April 2015 is used. However its validity is for 3 years but still referred as there is no new agreement yet,</p> <p>Basic pay follows Minimum Wage Amendment 2018 ( as per listed in Legal Requirement Register dated 31/01/2019) RM 1,100 per month</p> <p>Socso contribution for foreign workers started in January 2019 based on the renewal of their work permits e.g. Mia Badal.</p>	<p>Yes</p>
<p><b>4.4.5.4</b></p>	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p><b>- Minor compliance -</b></p>	<p>There is no contractors employed in-house and no contractors' workers.</p> <p>Contracts are awarded base on projects by tender and purchases by purchase orders.</p> <p>During audit, no major project ongoing to verify the employees of contractors' payment.</p>	<p>Yes</p>
<p><b>4.4.5.5</b></p>	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p><b>- Major compliance -</b></p>	<p>All employees in mill is full time employed and a list of demographics with name, gender, nationality, identification (passport, permit and Malaysian identify card), age, date of birth date joined, category of work and work description.</p>	<p>Yes</p>

<p><b>4.4.5.6</b></p>	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>All employees has a work contract which is signed by management and employee.</p> <p>Work contract dated 29/06/2017 for Tareq Mia (BK 0528713) Bangladesh is signed by both employer and worker. A copy of contract is given to the employee- verified during stakeholder consultation.</p> <p>Zairin bt Mohd Lajis (910925-01-6040) signed contract on 17/12/18.</p>	<p>Yes</p>
<p><b>4.4.5.7</b></p>	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p><b>- Major compliance -</b></p>	<p>Punch card system is used for recording work timing.</p> <p>Sighted punch card for Mia Badal and Fakrul for Dec 18 and Jan 19 shows clearly the working time and overtime.</p>	<p>Yes</p>
<p><b>4.4.5.8</b></p>	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p><b>- Major compliance -</b></p>	<p>Working hours and break time is stated in individual worker contract and also placed at notice board.</p> <p>Overtime is calculated based on time recording card (punch card).</p> <p>Working hours Tapan Maiti for Jan 2019 exceeds 12 hours of work consistently for 18, 19, 21, 22, 23, 24, 25 and 26 January. He has worked from 4pm till 6am or 7 am (work hours 14 -15 hours).</p> <p>The letter from Jabatan Tenaga Kerja Putrajaya dated 21/05/2018.</p> <p>Clarifies that overtime hours is allowed to 130 hours per month. Monthly work plan has been prepared (seen for January 19) at the beginning of each month and available for sampled month.</p> <p>Letter of consent from employee was available and signed by employee on 2/01/19.</p>	<p>Yes</p>
<p><b>4.4.5.9</b></p>	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p><b>- Major compliance -</b></p>	<p>Wages and overtime calculation is clear and stated in time recording card (punch card) and pay slip.</p>	<p>Yes</p>

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<p><b>4.4.5.10</b></p>	<p>Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.</p> <p><b>- Minor compliance -</b></p>	<p>Price bonus declared by MAPA, shift allowance for 2<sup>nd</sup> &amp; 3<sup>rd</sup> shift is given as additional incentive and included in the salary slip.</p> <p>Activities are organized for employees like sports, family day 1/5/2018 to Sri Mersing Resort, given mandarin oranges given on 04/02/19 for workers.</p>	<p>Yes</p>
<p><b>4.4.5.11</b></p>	<p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p> <p><b>- Major compliance -</b></p>	<p>Living quarters are provided to all workers but some choose to stay outside as mill is close to housing and township.</p> <p>Houses are equipped with 2 bedroom and a bathroom. Utilities ie water and electricity is provided free. Rubbish is collected alternate days.</p> <p>Interviewed Mohammad Faizal (Mandore), Fakrul and Badol (foreign worker) and they were happy with the facility provided.</p>	<p>Yes</p>
<p><b>4.4.5.12</b></p>	<p>The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p><b>- Major compliance -</b></p>	<p>Policy on Sexual Harassment dated 3/8/2009 is signed by Top Management. Interviewed Sujana a Committee member of the Gender Committee, and she states no harassment at work.</p> <p>Minutes of meeting 11/1/19 sighted and no sexual harassment or violence recorded.</p>	<p>Yes</p>
<p><b>4.4.5.13</b></p>	<p>The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p>	<p>Workers Union under National Union of Plantation workers is allowed in mill and workers are free to join. Procedure Sustainability Management (SMP-GPB-32 dated 18/01/2018) states on freedom of association and People's Policy.</p> <p>Payslip of worker Mia Tareq (Bangladesh) working for 1 ½ years has joined and deducted RM8 monthly for union. Upon interview, he explained that he freely joined the union.</p>	<p>Yes</p>

	- <b>Major compliance</b> -		
<b>4.4.5.14</b>	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.  - <b>Major compliance</b> -	Legal Regulations Register is updated to state the minimum age of recruitment is 18 years old. List of demographics of workers indicate that no below 18 years old employment in POM. Youngest employee is aged 19 (Muhamad Rahim – Indonesian worker).	Yes
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.  - <b>Major compliance</b> -	Training matrix and training programme for 2019 was established by the mill management. Evidence of adequate and appropriate training on safe working practices provided to workers was sighted.	Yes
<b>4.4.6.2</b>	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.  - <b>Major compliance</b> -	Similar method for identifying the training needs are used in all the visited estates and mill. The training needs for the estates for the FY 2019 training program has been established. The details of the training needs include categories of job descriptions, sections, and employees group. Among the subjects covered were those related to environment, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training, field activities, equipment handling, vehicles maintenance etc.	Yes
<b>4.4.6.3</b>	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.  - <b>Minor compliance</b> -	The training program for 2019 includes training for all categories of workers and contractors. Training program are made on annual basis. In addition it is subject to review during the financial year should need arises.	Yes
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			

<b>Criterion 4.5.1: Environmental Management Plan</b>											
<b>4.5.1.1</b>	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.  <b>- Major compliance -</b>	Environmental Policy was established, signed by President and Chief Operating Officer on 5 <sup>th</sup> October 2009. Communication of the policy was delivered in various methods such as display at strategic places, briefing during muster and trainings.	Yes								
<b>4.5.1.2</b>	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations  <b>- Major compliance -</b>	Environmental management plan was established at the mill which include environmental policy, aspect impact, air pollution, water pollution, noise pollution, GHG, waste management, water usage, etc. Environmental objectives were established through the management plan, e.g. improve efficiency of pollution control facilities such as ETP and boiler operation activities, improved disposal method, eliminate oil spillage, optimize usage and reduce wastage for water consumption etc.  Environmental aspect impact assessment was established to include all the activities, e.g. FFB ramp, sterilizer, boiler, ETP, workshop, etc.	Yes								
<b>4.5.1.3</b>	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.  <b>- Major compliance -</b>	The improvement and mitigation plan as initiated are given in the following table. <table border="1" data-bbox="1086 1082 1870 1343"> <thead> <tr> <th>Negative Impact</th> <th>Improvement/Mitigation Plan</th> </tr> </thead> <tbody> <tr> <td>Water wastage</td> <td>Optimise usage &amp; reduce wastage</td> </tr> <tr> <td>Loss of habitat, food resources &amp; breeding</td> <td>Isolate the treated &amp; contaminated water from discharge to monsoon drain</td> </tr> <tr> <td>Poor water quality for consumption</td> <td>To ensure the water usage used as necessary to prevent</td> </tr> </tbody> </table>	Negative Impact	Improvement/Mitigation Plan	Water wastage	Optimise usage & reduce wastage	Loss of habitat, food resources & breeding	Isolate the treated & contaminated water from discharge to monsoon drain	Poor water quality for consumption	To ensure the water usage used as necessary to prevent	Yes
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<p><b>4.5.1.4</b></p>	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p><b>- Minor compliance -</b></p>	<p>This is available and compiled and incorporated in the details as provided in 4.5.1.3 above.</p>	<p>Yes</p>												
<p><b>4.5.1.5</b></p>	<p>An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives.</p>	<p>A training program is available in the Mill Training Plan updated on yearly basis and revised as per the management requirement. Included in this plan is the internal and external program. Among the subjects identified related to environment are:</p>	<p>Yes</p>												



	- <b>Major compliance</b> -	<ul style="list-style-type: none"> <li>a) EPMC – Role &amp; Function of environmental performance monitoring</li> <li>b) Departmental policy &amp; objectives 2019</li> <li>c) ERT POME overflow/pipe leaking</li> <li>d) SW Management</li> <li>e) GHG</li> </ul>	
<b>4.5.1.6</b>	<p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p>- <b>Major compliance</b> -</p>	<p>Meetings were held mainly incorporated with safety meetings which were conducted quarterly. Apart from that concerns about environmental quality can also be channelled by the workers to the management during muster call.</p>	Yes
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>			
<b>4.5.2.1</b>	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period</p> <p>- <b>Major compliance</b> -</p>	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored in order to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement.</p>	Yes
<b>4.5.2.2</b>	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p>- <b>Major compliance</b> -</p>	<p>The estimation of direct usage of non-renewable energy (diesel &amp; petrol) for operations to determine energy efficiency of their operations inclusive of fuel use by contractors (transport &amp; machinery) was available in the estate annual budgets.</p>	Yes
<b>4.5.2.3</b>	<p>The use of renewable energy should be applied where possible.</p> <p>- <b>Minor compliance</b> -</p>	<p>The fibre and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fibre are delivered to estates for multi purposes or sold to outside buyers. EFB is used in the estates for</p>	Yes

		mulching. The quantum of fibre and shell produced from the mill processing is calculated based on the mass ratio i.e. shell and fibre approx. at 7% and 6 % of the FFB respectively.													
<b>Criterion 4.5.3: Waste management and disposal</b>															
<b>4.5.3.1</b>	All waste products and sources of pollution shall be identified and documented. <b>- Major compliance -</b>	All wastes and sources of pollution were identified and documented in the Waste Management. The compilation for 2019 was guided by the Sustainability Department applicable to both estates and mill.	Yes												
<b>4.5.3.2</b>	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for: a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. <b>- Major compliance -</b>	The waste management plan for 2019 was compiled and has been implemented. Details as follows: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Type of waste</th> <th style="width: 50%;">Action to be taken</th> </tr> </thead> <tbody> <tr> <td>Domestic waste -rubbish</td> <td>Collection/disposal 3x/week to the estate designated landfill. Method used is sandwich method filled up with soil 1-2 ft 1x/week</td> </tr> <tr> <td>Industrial Waste -Scrap metal</td> <td>Inventory maintained, tender at zone level for sale to licensed contractors</td> </tr> <tr> <td>Recyclable Waste -Plastic, glass, paper</td> <td>Storage and later for sale to licensed buyers every quarterly.</td> </tr> <tr> <td>Scheduled Waste 404 Clinical waste</td> <td>Inventory maintained. Storage in sharp bin in clinic. Disposal through VMO clinic.</td> </tr> <tr> <td>Scheduled Waste rags, plastics, filters,</td> <td>Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor.</td> </tr> </tbody> </table>	Type of waste	Action to be taken	Domestic waste -rubbish	Collection/disposal 3x/week to the estate designated landfill. Method used is sandwich method filled up with soil 1-2 ft 1x/week	Industrial Waste -Scrap metal	Inventory maintained, tender at zone level for sale to licensed contractors	Recyclable Waste -Plastic, glass, paper	Storage and later for sale to licensed buyers every quarterly.	Scheduled Waste 404 Clinical waste	Inventory maintained. Storage in sharp bin in clinic. Disposal through VMO clinic.	Scheduled Waste rags, plastics, filters,	Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor.	Yes
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		Scheduled Waste Spent lubricant & hydraulic oil	Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor	
		Scheduled Waste Disposed containers, bags, equipment contaminated with chemicals (Boiler Treatment),	Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by authorized vendor..	
		Biomass Waste Fiber /Shell	Reuse as fuel in the boiler combustion	
		The above initiative and management plan is also a common practice within the industry elsewhere.		
<p><b>4.5.3.3</b></p>	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p><b>- Major compliance -</b></p>	<p>The procedures for handling used chemicals classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by Head Office personnel and implemented in all estates and mills for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows;</p> <ul style="list-style-type: none"> <li>a) Management of class 1 chemical containers</li> <li>b) Management of class 2 (and higher) chemical containers.</li> <li>c) Management of fertilizer bags</li> </ul> <p>These documents were established on 13/8/2009 (OSH Manual) and 01/8/2013 (Sustainability Manual) and remained effective for practice in all estates and mills.</p>		<p>Yes</p>

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<p><b>4.5.3.4</b></p>	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p><b>- Minor compliance -</b></p>	<p>Domestic wastes were disposed at landfill inside the estates. Method of landfilling is guided by Landfill and domestic waste management procedure [SMP-GPB-12, Rev 01, dated 1/12/2014]. Based on site visits, the establishment of the landfill was in accordance to the procedure and no presence of toxic wastes observed.</p>	<p>Yes</p>
<p><b>Criterion 4.5.4: Reduction of pollution and emission</b></p>			
<p><b>4.5.4.1</b></p>	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.</p> <p><b>- Major compliance -</b></p>	<p>Environmental improvement and management plan was established by GAIOM, dated 26/1/2019. Air pollution, water pollution from mill operations, water pollution from line-site and landfill area, noise pollution, soil pollution, greenhouse gas emissions, waste management and water usage have been included in the plan.</p> <p>The mill has also complied with the legal requirements on monitoring its level of pollution to the air through:</p> <ul style="list-style-type: none"> <li>- Ambient air monitoring, conducted quarterly [ref.: report no. EIH1803(119-120)/GOMSB(AMB), EIH1806(012-013)/GOMSB(AMB), EIH1808(146-147)/GOMSB(AMB) and EIH1812(085-086)/GOMSB(AMB) for 2018] – all of the results complied with the regulated limit</li> <li>- Stack sampling, conducted twice a year for boiler’s chimney No. 4 [ref.: report no. EIH1803(117)/GOMSB(BOI4) and EIH1808(144)/GOMSB(BOI4) for 2018] - all of the results complied with the regulated limit</li> </ul> <p>Both tests were done by the accredited lab (SAMM No. 298)</p>	<p>Yes</p>
<p><b>4.5.4.2</b></p>	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p><b>- Major compliance -</b></p>	<p>Environmental management plan was established at the mill which include environmental policy, aspect impact, air pollution, water pollution, noise pollution, GHG, waste management, water usage, etc. Environmental objectives were established through the management</p>	<p>Yes</p>

		<p>plan, e.g. improve efficiency of pollution control facilities such as ETP and boiler operation activities, improved disposal method, eliminate oil spillage, optimize usage and reduce wastage for water consumption etc.</p> <p>Environmental aspect impact assessment was established to include all the activities, e.g. FFB ramp, sterilizer, boiler, ETP, workshop, etc.</p>			
<b>4.5.4.3</b>	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p><b>- Major compliance -</b></p>	<p>The treated mill effluent discharge is regularly monitored as prescribed in the "Jadual Pematuhan" license issued to the mill. The limit for the Biochemical Oxygen Demand (BOD) discharge is 500 mg/l for land application. Regular monitoring is made on monthly basis and reported quarterly to DOE. For 2018 performance, the lowest BOD was 39 ppm and the highest was 55 ppm.</p>	Yes		
<b>Criterion 4.5.5: Natural water resources</b>					
<b>4.5.5.1</b>	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> <li>a) Assessment of water usage and sources.</li> <li>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</li> <li>c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> </ul> <p><b>- Major compliance -</b></p>	<p>The Water Management Plan for the mill has been established with latest review on 7/2/2019. The plan emphasized on the following areas.</p> <ul style="list-style-type: none"> <li>a) Water source</li> <li>b) Efficient use of water</li> <li>c) Renewability of water source</li> <li>d) Avoidance of surface and ground water contamination</li> </ul> <p>Details of the action plan and monitoring among others are tabled as follows;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center;">Areas of concerns</td> <td style="width: 50%; text-align: center;">Action Plan</td> </tr> </table>	Areas of concerns	Action Plan	Yes
Areas of concerns	Action Plan				

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		1	Water source	Government Treated Water	Supply to residential areas /complex for all divisions
				Water from catchment pond	Use for mill processing and washing.
				Rain Harvest	Use for general compound and washing.
		2	Efficient use of water	Residential areas	Monitoring of pipes leakages
				Optimize usage & reduce wastage	Recycle coolant water from engine room back to water system. Reduce floor washing by sweeping.
				Education/training	Promote water conservation/awareness among employees
		3	Renewability water source	Rain water capture at catchment	Monitoring of pond level and daily rainfall.
				Rain water harvest	Collection through gutter and usage for floor cleaning.
		4	Avoidance of surface/ground water contamination	Contamination of surface and ground water through run-off soil, nutrients or chemicals,	Inspection of bund/secondary compartment for CPO, chemical storage area including SW store & machinery.

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				disposal of POME	<p>Proper arrangement of EFB to estate.</p> <p>Land irrigation application for POME discharge</p> <p>Educate ERPT during event of spillages.</p>		
				Outgoing water into main natural waterways be monitored at frequency that reflects the estates/mills current activities which may have negative impact.	<p>To monitor water quality</p> <p>To monitor BOD of POME</p> <p>To maintain good condition of sewage system.</p> <p>To ensure landfill &gt;400 m from river/water source to prevent contamination.</p> <p>Maintenance of flatbed/furrow for proper flow.</p>		
				Drainage system	Free flow drains & scheduled maintenance		
				Water pollution control	To monitor the water quality for drinking water upstream/downstream water, boundary water, mill discharge water.		

		<p>5 Others</p>	<p>Aim to ensure plantations activities do not cause adverse impacts to water source of local communities, employees and their families.</p>	<p>To monitor water quality through analysis of hulu/hilir, boundary &amp; outlet. Monitoring of chemical consumption used for water treatment plant. rainfall,          Monitoring of chemical consumption used for water treatment plant. rainfall</p>																											
<p>Verified the upstream and downstream of Sg. Linau water analysis (ref.: GENTING/RW/POM4788(A&amp;B) as requirement is stipulated in the <i>Jadual Pematuhan</i> and results details are shown as follows:</p>																															
<table border="1"> <thead> <tr> <th rowspan="2">Parameters</th> <th colspan="2">21/11/2018</th> </tr> <tr> <th>Upstream (mg/l)</th> <th>Downstream (mg/l)</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>4.2</td> <td>5.8</td> </tr> <tr> <td>BOD</td> <td>15</td> <td>9</td> </tr> <tr> <td>COD</td> <td>232</td> <td>164</td> </tr> <tr> <td>SS</td> <td>32</td> <td>24</td> </tr> <tr> <td>TS</td> <td>137</td> <td>154</td> </tr> <tr> <td>DO</td> <td>4.5</td> <td>4.6</td> </tr> <tr> <td>Volatile fatty acid</td> <td>766</td> <td>753</td> </tr> </tbody> </table>						Parameters	21/11/2018		Upstream (mg/l)	Downstream (mg/l)	pH	4.2	5.8	BOD	15	9	COD	232	164	SS	32	24	TS	137	154	DO	4.5	4.6	Volatile fatty acid	766	753
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<p>The water consumption used in the mill is recorded and checked against the optimum level. Reasons for the irregularities usage were remarked accordingly.</p>																															




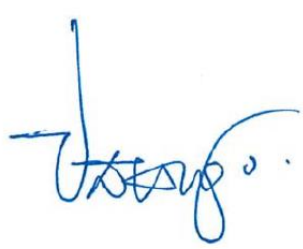
<b>4.5.5.2</b>	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.  - <b>Major compliance</b> -	Palm Oil Mill Effluent (POME) treated through anaerobic pond treatment system where the licensed limit for final discharge BOD is 500mg/l for latest compliance schedule (License No:003886), using land application method.	Yes
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Mill Management</b>			
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  - <b>Major compliance</b> -	<p>The SOP for the estates and mill operations are available which is prepared on Group basis. There are levels/types of the documentation identified as follows:</p> <ul style="list-style-type: none"> <li>a) Quality, Environmental, Safety &amp; Health &amp; Sustainability Manual – 01/7/17</li> <li>b) System Procedure – 01/1/2012</li> <li>c) Procedure Manual – 02/1/2018</li> <li>d) SOM Standard Operating Manual – 2013</li> <li>e) Safe Operating Procedure – 01/1/2011</li> <li>f) Environmental Control Procedure – 01/9/2018</li> <li>g) Store Operating Manual – 2014</li> <li>h) Jobs description - 2012</li> </ul> <p>The mill operations are supervised by the staff, Engineers of the Mill. In addition there are visit from the SVP and mill management team. Also from the supporting units .i.e. OSH, Sustainability Department. Compliance and performance are discussed monthly with reports submitted to the Head Office</p>	Yes

<p><b>4.6.1.2</b></p>	<p>All palm oil mills shall implement best practices.  <b>- Major compliance -</b></p>	<p>The monitoring of the mill process is made through the shift supervision headed by An Engineer/Executives. All process parameters are documented and summarized in a daily report. The external monitoring is made through visits i.e. SVP and the mill management team. The last SVP visit at GAIOM was on 31/12/2018. In addition there are audits by OSH, Sustainability and Financial Audits. This is to ensure compliance to Policies, procedures in relation mill operations, financial, OSH, welfare among others being adhered.</p>	<p>Yes</p>
<p><b>Criterion 4.6.2: Economic and financial viability plan</b></p>			
<p><b>4.6.2.1</b></p>	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.  <b>- Major compliance -</b></p>	<p>The annual business plan is available as per the Group Financial Procedure. &amp; Guidelines. Both estates and the mill had a similar format i.e. in the form of annual budget with a three year projection. This business plan is prepared as guidance for future planning. The budget contains palm year of planting, age categories, and FFB production. Component of operating expenditure includes Administration, processing cost of specific stations, workshop operations, effluent operations, general upkeep, transportation, buildings, labour overhead, EVIT (running accounts for engines, vehicles, implements &amp; tractors. Inclusive in the business plan is also Capital Expenditure (CAPEX). The budget for 2019 for both mill &amp; the estates were available for verification.</p>	<p>Yes</p>
<p><b>Criterion 4.6.3: Transparent and fair price dealing</b></p>			
<p><b>4.6.3.1</b></p>	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.  <b>- Major compliance -</b></p>	<p>Tender methodology is used for awarding contracts and is documented and effectively implemented.   Tendering process is managed by HQ and letter of award is given to contractor. Contractor then has to accept the tender signing on the letter of acceptance of tender.</p>	<p>Yes</p>

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		For service provider on Schedule Waste disposal by Southern Strength is based on Quotation from service provider and Purchase Order issuance by Mill.	
<b>4.6.3.2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. Sighted Letter of Acceptance of Tender by Tuck Ho Engineering Works Sdn Bhd for Supply, Fabricate, Deliver, Dismantle, Install, Commission and Guarantee for one unit of thresher drum (No. 2). Contract price: RM 268,500 and completion period is 4 months starting November 2018. Periodic payment plan: 10% contract sum upon acceptance, 65% upon delivery of complete units. 20% upon completion of commissioning and 5% after 12 months of project as defect liability.	Yes
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	In case of the engagement of contractors, they shall be made to understand the MSP0 requirements and shall provide the required documentation and information. <b>- Major compliance -</b>	There are no in-house contractors but more list of suppliers and contractors. The contracts are based on tender or Purchase Order. Contractors are made to understand MSP0 requirements during stakeholder consultation 13 August 18 and letters to new contractor.	Yes
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	The management has documented agreed contracts with the contractor. Contract sampled Tuck Ho Engineering Works Sdn Bhd for thresher drum.	Yes
<b>4.6.4.3</b>	The management shall accept MSP0 approved auditors to verify the assessments through a physical inspection, if required. <b>- Minor compliance -</b>	The management has accepted MSP0 approved auditors such as BSI to verify assessments through a physical inspection if required. BSI audit schedule Feb 2019 has been agreed by Mill Management.	Yes

**4.0 Assessment Conclusion and Recommendation:**

<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>	
<p>Based on the findings during the assessment Genting Ayer Item Oil Mill and Genting Plantation (Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate) Certification Unit complies with the MS 2530-2:2013 or MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Genting Ayer Item Oil Mill and Genting Plantation (Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate) Certification Unit is approved and/or continued.</p>	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<p><b>Name:</b> Arunan Kandasamy</p>	<p><b>Name:</b> Valence Shem</p>
<p><b>Company name:</b> Genting Plantations Berhad</p>	<p><b>Company name:</b> BSI Services Malaysia Sdn. Bhd.</p>
<p><b>Title:</b> SVP Plantation (Malaysia)</p>	<p><b>Title:</b> Lead Auditor</p>
<p><b>Signature:</b></p>  <p>ARUNAN KANDASAMY            SENIOR VICE PRESIDENT            PLANTATION (MALAYSIA)</p> <p><b>Date:</b> 18/9/19.</p>	<p><b>Signature:</b></p>  <p><b>Date:</b> 12/9/2019</p>

**Appendix A: Assessment Plan**

Date	Time	Subjects	VSH	FLA
Monday 11/2/2019 <b>GKBE</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 Kulai Besar Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, worker housing, clinic, Landfill, , etc.	✓	✓
	1000-1100	<b>Stakeholder consultations:</b> Consultation with stakeholders such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.		✓
	1200-1300	Lunch break		
	1300-1600	<b>Genting Kulai Besar Estate</b> Document review P1 – P7 (MSPO Part 3): 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.	✓	✓
	1600-1630	Audit team discussion & preparation for closing meeting	✓	✓
Tuesday 12/2/2019 <b>GAIOM</b>	1630-1700	Closing meeting	✓	✓
	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 Ayer Item POM</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.	✓	✓
	1000-1100	<b>Stakeholder consultations:</b> Consultation with stakeholders such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.		✓
	1200-1300	Lunch break		
	1300-1600	<b>Genting Ayer Item POM</b> Document Review P1 – P6 (MSPO Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓
1600-1630	Audit team discussion & preparation for closing meeting	✓	✓	
Wednesday 13/2/2019	1630-1700	Closing meeting	✓	✓
	0830-0900	Opening meeting: <ul style="list-style-type: none"> <li>Opening presentation by audit team leader</li> </ul>	✓	✓

GTME		<ul style="list-style-type: none"> <li>Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation)</li> </ul>		
	0900-1200	<b>Genting Tanah Merah Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, worker housing, clinic, Landfill, , etc.	✓	✓
	1000-1100	<b>Stakeholder consultations:</b> Consultation with stakeholders such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.		✓
	1200-1300	Lunch break		
	1300-1630	<b>Genting Tanah Merah Estate</b> Document review P1 – P7 (MSPO Part 3): 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.	✓	✓
	1600-1630	Audit team discussion & preparation for closing meeting	✓	✓
	1630-1700	Closing meeting	✓	✓
Thursday 14/2/2019 GTBE	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>	✓	✓
	0900-1300	<b>Genting Tebong Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, worker housing, clinic, Landfill, , etc.	✓	✓
	1000-1100	<b>Stakeholder consultations:</b> Consultation with various categories of stakeholders such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.		✓
	1200-1300	Lunch break		
	1300-1600	<b>Genting Tebong Estate</b> Document review P1 – P7 (MSPO Part 3): 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.	✓	✓
	1600-1630	Audit team discussion & preparation for closing meeting	✓	✓
	1630-1700	Closing meeting	✓	✓

**Appendix B: List of Stakeholders Contacted**

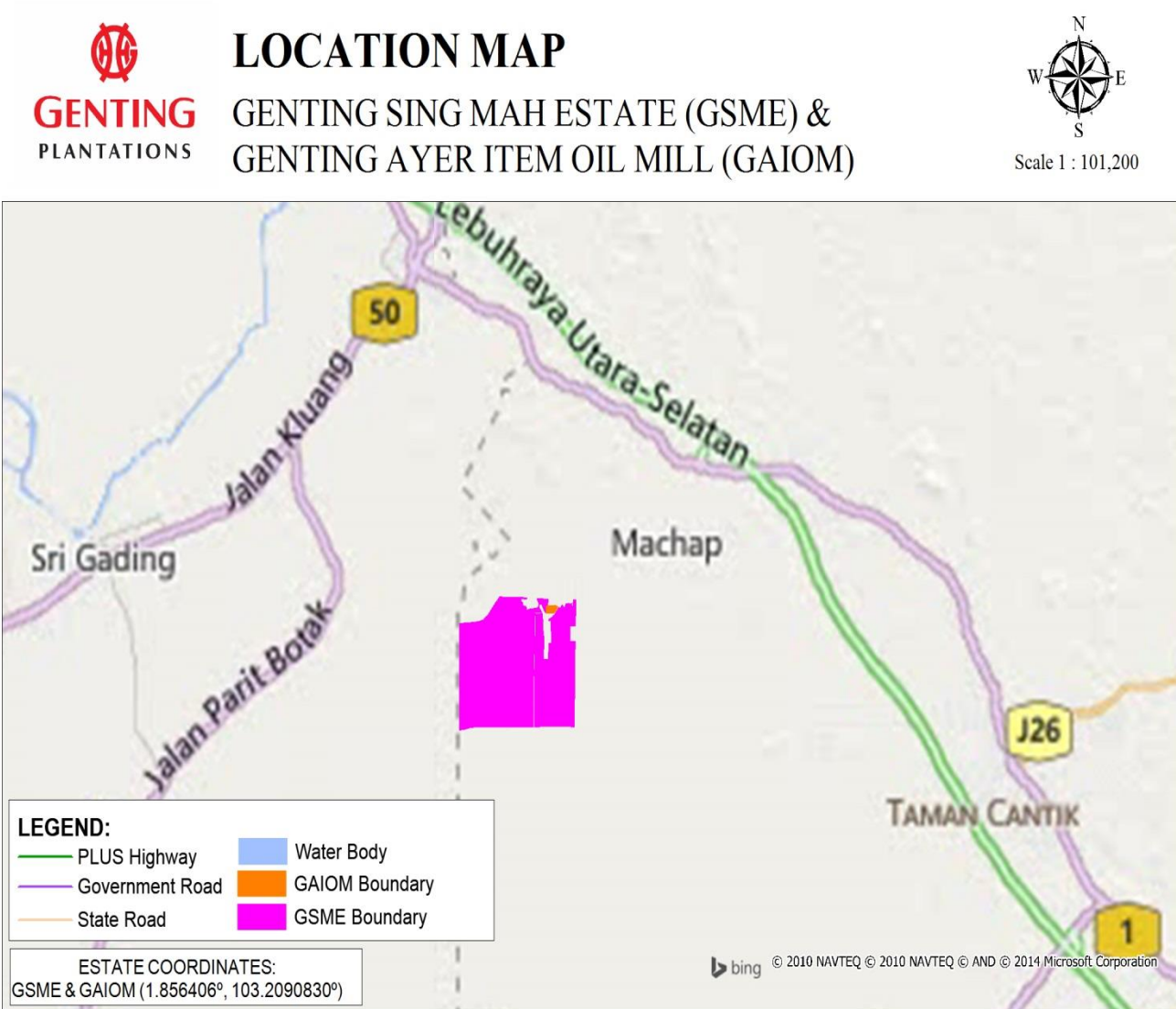
<b>List of Stakeholders Contacted</b>	
<p><b>Internal Stakeholders</b></p> <p>Managers and Assistants Mill &amp; Estate                      Male Mill Staff/ Workers                      Female Mill Staff/Workers                      Foreign Workers                      Male and Female Estate workers                      Workers Representatives                      Gender Committee</p>	<p><b>Union/Contractors/Local Communities</b></p> <p>Contractors                      Neighbouring estates                      Surrounding village</p>
<p><b>Government Departments</b></p> <p>Nil</p>	<p><b>NGO</b></p> <p>Nil</p>

**Appendix C: Smallholder Member Details**

N/A



**Appendix D: Location Maps of Palm Oil Mills and Supply bases**



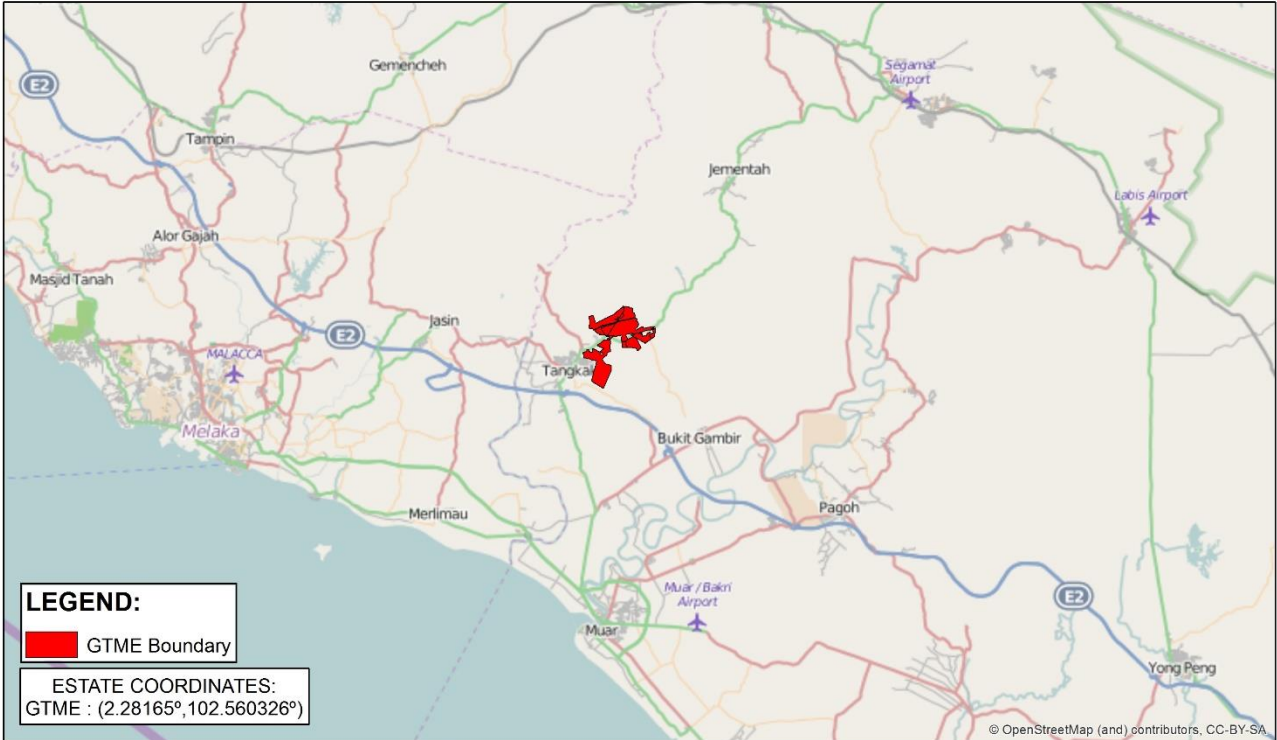
**Genting Tanah Merah Estate**



**LOCATION MAP**  
**GENTING TANAH MERAH ESTATE**



Scale 1:438,800



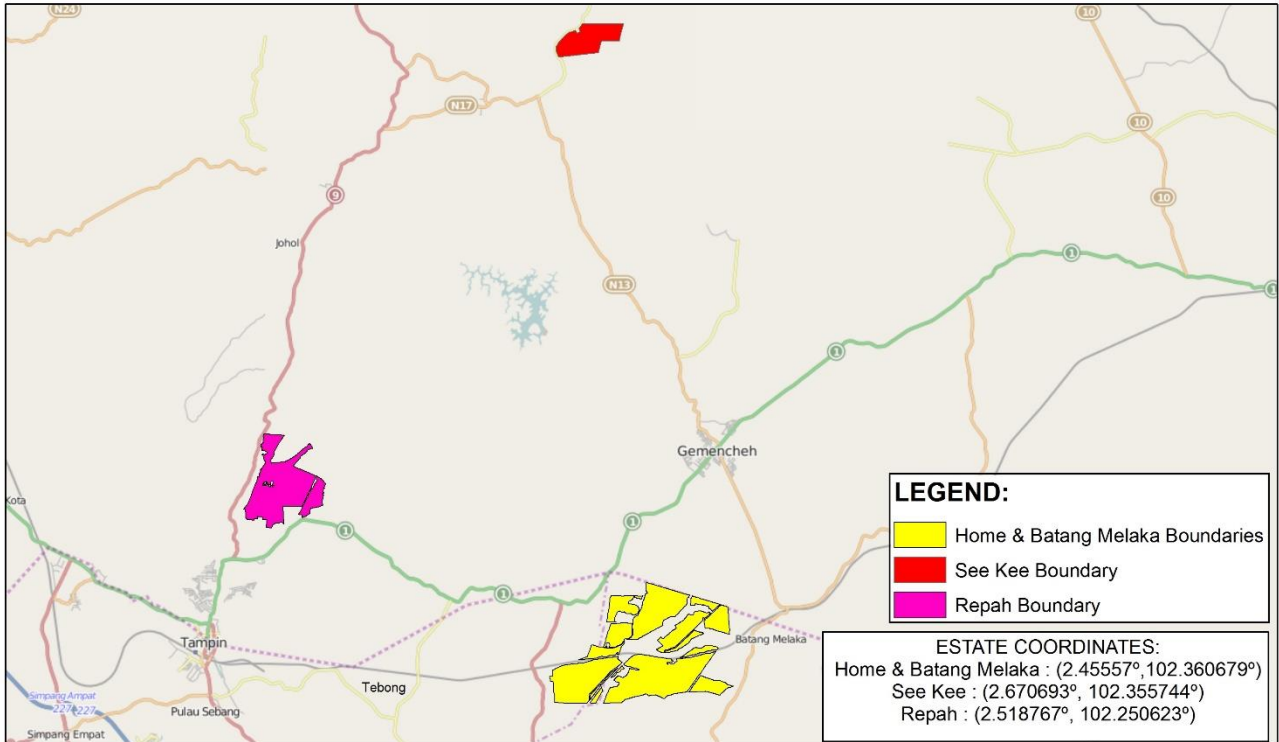
**Genting Tebong Estate**



**LOCATION MAP**

**GENTING TEBONG ESTATE**

**HOME, BATANG MELAKA, SEE KEE & REPAH DIVISIONS**



**Genting Kulai Besar Estate**

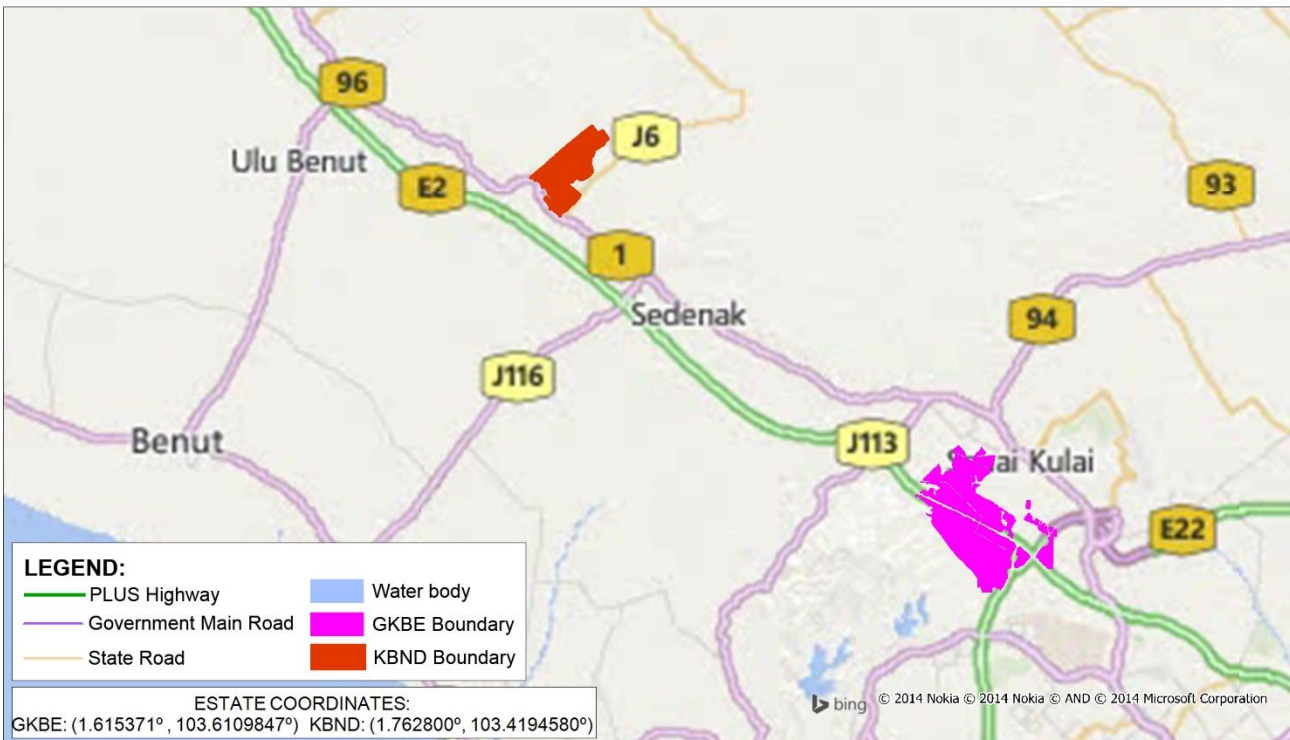


**LOCATION MAP**

GENTING KULAI BESAR ESTATE (GKBE) &  
KULAI BESAR NORTH DIVISION (KBND)



Scale 1 : 216,800



**Appendix E: List of Abbreviations**

AN	Ammoniacal Nitrogen
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
GMP	Good Manufacturing Practice
HCV	High Conservation Value
IAV	Initial Assessment Visit
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
LPE	Ladang Padang estate
LPPOM	Ladang Padang Palm Oil Mill
LRE	Ladang Rompin estate
LRPOM	Ladang Rompin Palm Oil Mill
MSDS	Material Safety Data Sheet
MSPO	Malaysian Sustainable Palm Oil
O&G	Oil and Grease
PK	Palm Kernel
PPE	Personal Protective Equipment
PSQM	Plantation Sustainability and Quality Management
PQR	Performance Quality Rating
RC	Re-Certification
RED	Renewable Energy Directive
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SOU	Strategic Operating Unit
SS	Suspended Solids
TN	Total Nitrogen
TS	Total Solids
VFA	Volatile Fatty Acids