

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

Company Name: GENTING PLANTATIONS BERHAD
Client company Address: 10 th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur.
Certification Unit: Genting Bukit Sembilan Estate
Location of Certification Unit: 09300 Kuala Ketil, Kedah, Malaysia

**Report prepared by:
Mohd Hafiz Bin Mat Hussain (Lead Auditor)**

Report Number: 9673582

Assessment Conducted by:
BSI Services Malaysia Sdn Bhd,
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
59200 Kuala Lumpur
Tel +603 2242 4211 Fax +603 2242 4218
www.bsigroup.com

TABLE of CONTENTS	Page No
Section 1: Executive Summary	3
1.1 Organizational Information and Contact Person	3
1.2 Certification Information	3
1.3 Location of Certification Unit	4
1.4 Plantings & Cycle	4
1.5 FFB Production (Actual) and Projected (tonnage).....	4
1.6 Certified CPO / PK Tonnage	4
1.7 Certified Area	4
1.8 Details of Certification Assessment Scope and Certification Recommendation:	5
Section 2: Assessment Process	6
1. Assessment Program	6
Section 3: Assessment Findings	8
3.1 Details of audit results	8
3.2 Details of Nonconformities and Opportunity for improvement.....	8
3.3 Status of Nonconformities Previously Identified and OFI	9
3.4 Issues Raised by Stakeholders	13
3.5 Summary of the Nonconformities and Status.....	14
3.6 Summary of the findings by Principles and Criteria	15
Section 4: Assessment Conclusion and Recommendation	54
Appendix A: Assessment Plan	55
Appendix B: List of Stakeholders Contacted	56
Appendix C: Smallholder Member Details.....	57
Appendix F: Location and Field Map (Main Div and Paya Kamunting Div)	58
Appendix G: List of Abbreviations	60

Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
MPOB License	508758102000		
Company Name	Genting Plantations Berhad		
Address	10 th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur		
Group name if applicable:	-		
Subsidiary of (if applicable)	-		
Contact Person Name	Mr. Arunan Kandasamy		
Website	www.gentingplantations.com	E-mail	arunan.kandasamy@genting.com
Telephone	03-2333 6401	Facsimile	N/A

1.2 Certification Information			
Certificate Number	MSPO 682996		
Issue Date	28/01/2019	Expiry date	27/01/2024
Scope of Certification	Production of Sustainable Oil Palm Fruits		
Stage 1 Date	Exempted. GBSE is RSPO certified estate.		
Stage 2 / Initial Assessment Visit Date (IAV)	27/07/2018		
Continuous Assessment Visit Date (CAV) 1	24-25/07/2019		
Continuous Assessment Visit Date (CAV) 2	-		
Continuous Assessment Visit Date (CAV) 3	-		
Continuous Assessment Visit Date (CAV) 4	-		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE119-60196938	ISCC EU	ASG Cert GmbH	06/06/2019 – 05/06/2020
RSPO 673953	RSPO	BSI Services (M) Sdn Bhd	17/09/2022

MSPO Public Summary Report

Revision 0 (Aug 2017)

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 Bukit Sembilan Estate	09300 Kuala Ketil, Kedah, Malaysia	5° 34' 32.5" N	100° 41' 09.8" E

1.4 Plantings & Cycle						
Estate	Age (Years) - ha					
	1-3	4-7	8-15	16-20	21-25	>25
Genting Bukit Sembilan Estate	0	11.19	66.64	475.88	505.22	121.13

1.5 FFB Production (Actual) and Projected (tonnage)			
Estate	Estimated (Jan 19 – Dec 19)	Actual (July 18 – June 19)	Forecast (July 19 – June 20)
Genting Bukit Sembilan Estate	26,420.00	28,694.81	24,500.00

1.6 Certified CPO / PK Tonnage			
Mill	Estimated (Previous Year)	Actual (This Year)	Forecast (Next Year)
N/A	CPO (OER: %)	CPO (OER: %)	CPO (OER: %)
	PK (KER: %)	PK (KER: %)	PK (KER: %)

1.7 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Bukit Sembilan	1,180.06	2.15	51.95	1,234.16	95.62 %
TOTAL	1,180.06	2.15	51.95	1,234.16	95.62 %

1.8 Details of Certification Assessment Scope and Certification Recommendation:

BSI Services Malaysia Sdn Bhd has conducted the Annual Surveillance Assessment 1 of Genting Bukit Sembilan Estate, located in Kuala Ketil, Kedah comprising an infrastructure

The assessment was conducted onsite to assess the compliance of the certification unit against the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder and MSP0 Guidance.

The onsite assessment was conducted on 24-25/07/2019.

Based on the assessment result, Genting Bukit Sembilan Estate complies with the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder and MSP0 Guidance and recommended for certification.

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
59200 Kuala Lumpur
Tel +603 2242 4211 Fax +603 2242 4218
Nicholas Cheong: Nicholas.Cheong@bsigroup.com
www.bsigroup.com

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 24-25/07/2019. The audit programme is included as Appendix A. The approach to the audit was to treat Genting Bukit Sembilan Estate as a MSP0 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 was 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 MSP0 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 MSP0 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.

MSPO Public Summary Report
Revision 0 (Aug 2017)

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 internally reviewed by MSPO Technical Reviewer by BSI.

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

1. Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Genting Bukit Sembilan Estate	√	√	√	√	√

Tentative Date of Next Visit: July 29, 2020 – July 30, 2020

Total No. of Mandays: 2 Mandays

BSI Assessment Team:

Mohd Hafiz Mat Hussain - Lead Auditor

He holds Bachelor Degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an auditor for several standards including ISO 9001, ISO 14001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2014, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2016. He had been involved in RSPO auditing since May 2013 within Malaysia, Papua New Guinea, Solomon Islands, Gabon and Liberia. During this assessment, he assessed on the aspects of land and legal issues, internal audit, management review, OHS, environment, workers welfare, stakeholder consultation, social, long-term economic viability environment and ecological, etc. He is fluent in Bahasa Malaysia and English languages.

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

The nonconformity is listed below.

During the Annual Surveillance Assessment 1, there was no nonconformities raised.

Noteworthy Positive Comments	
1.	Good commitment from the management

3.3 Status of Nonconformities Previously Identified and OFI

Major Nonconformities:		
Ref	Area/Process	Clause
1664508-201806-M1	Genting Bukit Sembilan Estate	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:	Compliance with the applicable local, state, national and ratified international laws and regulations was not effectively demonstrated.	
Objective Evidence:	Referring to Workers Minimum Housing and Amenities Act 1990, section 19 (3): employer responsibility to appoint VMO for clinic visit once every 2 week @ fortnightly. Based on contract dated 1/1/18, under para 3.0 VMO visit is once a month. The linesite inspection at PKD was conducted by HA on monthly basis. As according to the Workers Minimum Housing and Amenities Act 1990, section 23 weekly housing inspection.	
Corrections:	<ol style="list-style-type: none"> 1. New addendum will be inserted in the contract agreement where the VMO will be required to visit the clinic once every 2 weeks as per the Workers Minimum Housing and Amenities Act 1990. 2. To appoint an authorized person (Asst Manager) to conduct the linesite inspection. 3. To issue memo to the authorized person to conduct the linesite visit weekly. 	
Root cause analysis:	<p>The visit frequency was monitored/implemented as per the groups standard contract agreement which has been the practice for so many years, and failed to cross check this requirement/compliance against the LRR.</p> <p>HA is based at the main div (Kuala Ketil) located about 4 hours journey (two way) from PKD. Therefore, he was unable to conduct the 'weekly' linesite inspection at PKD.</p>	
Corrective Actions:	<p>To ensure regular monitoring and compliance with the Workers Minimum Standards of Housing and Amenities Act 1990.</p> <p>To review and revise all the other existing contract agreement to comply with the legal requirements and LRR.</p>	
Assessment Conclusion:	<p>The estate management has amended and re-issued the addendum of the contract agreement which has included the frequency of visit to twice a month on 1/8/2018 which signed by the VMO. Besides, VMO visit book was sighted where the visit was carried out on 18/8/2018 and 28/8/2018.</p> <p>The corrective action was effectively closed on 26/9/18. Continuous implementation will be further verified in the next assessment.</p> <p>Verification during ASA2: Addendum contract for service visiting medical officer (VMO) dated 1/8/2018 and</p>	

**MSP0 Public Summary Report
Revision 0 (Aug 2017)**

8/8/2018 between the Estate Manager and Dr K. Balakrishnan. The addendum stated that the visit to the estate should be twice a month (fortnightly).

Linesite inspection was carried out on weekly basis by Hospital Assistant and Assistant in Genting Bukit Sembilan Estate. The last inspection was carried out on 19/7/2019 for Main Div and 20/7/2019 for Paya Kamunting Div. The inspection was conducted on weekly basis. Thus, the Major NC remain closed.

MSPO Public Summary Report
Revision 0 (Aug 2017)

Major Nonconformities:		
Ref	Area/Process	Clause
1664508-201806-M2	Genting Bukit Sembilan Estate	4.4.5.6
Requirements:	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.	
Statement of Nonconformity:	Implementation of the employment contract was not completely effective	
Objective Evidence:	<p>Sampled workers found that they were not signed on the new addendum of employment contract dated 21/3/2018 as below:</p> <ul style="list-style-type: none"> a. Employee No.: 01089 b. Employee No.: 02415 c. Employee No.: 02462 d. Employee No.: 02469 <p>Besides, the watchman (Employee No.: 02548) that recruited on March 2018 has yet to sign on the employment contract.</p>	
Corrections:	<p>Addendum for all the missed out workers were signed and acknowledged by the workers. A copy was given to each worker while another copy was filed.</p> <p>The watchman (Employee No.: 02548) had signed and acknowledged the contract agreement. A copy was given to him while another copy was filed.</p>	
Root cause analysis:	<p>Latest addendum was issued only for foreign workers, while local workers was left out from the process due to the misunderstanding/miscommunication between the office clerk and field staff.</p> <p>Employment contract agreement for the watchman was omitted by the office.</p>	
Corrective Actions:	<p>To ensure all the legal and sustainability requirements are conveyed and communicated effectively throughout the entire management levels.</p> <p>Follow up on the implementation also will be scrutinized closely by the management.</p> <p>To issue memo to all staffs to comply with all legal requirements and that if there is any doubt they shall refer to the relevant PIC ie Sustainability Officer, HRAD etc instead of taking own decision.</p>	
Assessment Conclusion:	<p>A copied of latest addendum which has been signed and acknowledged by the workers and an employment contract was signed by the watchman. Besides, internal audit was carried out by the Sustainability Team on 22/8/2018 to ensure the compliance of requirements. Manager of Sustainability also carried out training to brief on the Social Management Proceudre and Procedure on Recruitment of Foreign Workers to ensure the personnel on the ground understood the process. Training records dated 22/8/2018 were sighted.</p>	

MSP0 Public Summary Report
Revision 0 (Aug 2017)

The corrective action was effectively closed on 26/9/18 by offsite due to the risk of system breakdown was very minimal. Continuous implementation will be further verified in the next assessment.

Verification during ASA1:

All workers sampled found that they were signed on the new addendum of employment contract for:

- Employee # 26709;
- Employee # 02559;
- Employee # 26697;
- Employee # 26708;
- Employee # 02540;
- Employee # 02407;
- Employee # 02436;
- Employee # 02537;
- Employee # 02472;
- Employee # 02533;

Thus, the Major NC remain closed.

3.4 Issues Raised by Stakeholders

IS #	Description
1	<p>Issues: Workers’ Representatives - The workers informed that they have been treated equally without discrimination. They were paid according to Minimum Wage Order 2018. They were given one rest day in a week.</p> <p>Management Responses: The management will ensure that the workers were treated equally without discriminate of their status of employment.</p> <p>Audit Team Findings: No other issue.</p>
2	<p>Issues: Contractors – The contractors have informed that the payment by management was made promptly. They have good relationship with the management.</p> <p>Management Responses: The management will continue to maintain good relationship with the contractors.</p> <p>Audit Team Findings: Reviewed of the payment vouchers found that payment was made once the invoice received.</p>
3	<p>Issues: Local Communities – There was no land dispute case reported so far. Trenches, boundary stones and gates were established to demarcate the boundary. They have good relationship with the management.</p> <p>Management Responses: The management will continue to maintain good relationship with the local communities.</p> <p>Audit Team Findings: No other issue.</p>
4	<p>Issues: SJKT Ldg Bukit Sembilan – They have good relationship with the management.</p> <p>Management Responses: The management will continue to maintain good relationship with the school.</p> <p>Audit Team Findings: No other issue.</p>

3.5 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1664508-201806-M1	Major	27/7/2018	Close out on 26/9/2018
1664508-201806-M2	Major	27/7/2018	Close out on 26/9/2018

3.6 Summary of the findings by Principles and Criteria

Criterion / Indicator	Assessment Findings	Compliance	
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	Established as Sustainability Management Group Policies as following: <ul style="list-style-type: none"> • Sustainability Policy; Rev. 00; Date: 3/8/2009 • Environmental Policy; Rev. 00; Date: 5/10/2009 • Environmental Policy; Rev. 00; Date: 3/8/2009 • People Policy; Rev. 00; Date: 3/8/2009 • Sexual Harassment Policy; Rev. 00; Date: 3/8/2009 • Safety and Health Policy; Rev. 02; Date: 1/7/2018 • Zero Burning Policy; Rev. 00; Date: 10/8/2011 • Food Safety Policy; Rev. 00; Date: 2/2/2010 • Whistleblower Policy; Rev. 00; Date: 4/4/2013 • MSPO Policy; Rev. 00; Date: 18/3/2014 • Policy on Ethical Conduct and Integrity; Rev. 00; Date: 22/6/2015 • Social Policy (Incorporating Special Labour and Human Rights requirements); Rev. 00; Date: 22/6/2015 <p>All policies were available in dual language (BM & English) and signed Genting Plantations Berhad President & COO. Latest briefing on Understanding & Awareness of Group Policies was conducted by GBSE management to all employees on 18/7/19.</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The MSPO Policy; rev. 00; Dated 18/3/2014 sighted emphasized commitment to continual improvement. Sighted records of policy briefing conducted on 18/7/19.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Implemented based on Sustainability Management Procedure of Internal Audit; SMP-GPB-03; Rev. 01; Date: 11/12/2013. Sighted Internal Audit Plan for the audit to be conducted from 10-11/7/2019 by Lead Auditor (P. Sivaji Raja) from Sustainability Department. 5 Major NCRs were raised. Sighted that all findings still in progress of closure.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Documented as procedures above, Internal Audit Plan, Internal Audit Report Summary, Internal Audit NCR form and Internal Audit Observations (OBS) form.	Complied
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	Records of internal audit were included in the Management Review Meeting dated 12/7/2019.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.1.3 – Management Review			
4.1.3.1	<p>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.</p> <p>- Major compliance -</p>	<p>Implemented based on Sustainability Management Procedure of Management Review; SMP-GPB-06; Rev. 01; Date: 25/5/2018. Sighted agendas to be covered including following:</p> <ul style="list-style-type: none"> • Status of outstanding issues from previous meeting • Changes, improvement or modification to the Sustainability Management System (SMS) • Internal audit and external audit findings on SMS • Complaints and Grievances Book • Enquiry Register Book • Stakeholder Meeting Reports/Minutes • Risk Management (specific to ISCC) • Green-house value (specific to ISCC, MSPO & RSPO) • Review continual improvement status and its recommendations • Review on resource & training requirements • Review of Sustainability Policy and its objectives status • Review of effectiveness in achieving quality, environmental, social, safety and health objectives • Compliance status on legal and other requirements • Any other matters <p>The procedure also specifies the Management Review Committee at the OU shall consist of Estate Manager, Senior Assistant, Assistant Manager/Engineer, Chief Clerk, Field Staffs, Supervisors, Office Clerks, OSH Coordinator, Sustainability Coordinator and Hospital Assistant.</p> <p>Sighted the latest management review meeting records shown meeting conducted on 12/7/2019 among Estate Managers, Sr. AM, AM</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		and HQ, KL Sustainability Manager with discussion/review on general view on MSPO Internal Audit Findings, Status of MSPO Internal Audit Findings and Conclusion.	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -	Established as Continuous Improvement Plan; Date: 4/4/2019, mostly for following elements: <ul style="list-style-type: none"> • Minimize use of certain pesticides – e.g. removal of Paraquat • Environmental impacts – e.g. water & waste management, recycling program • Social impacts – e.g. interior and exterior of workers quarters renovation 	Complied
4.1.4.2	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. - Major compliance -	Mechanization has been adopted in Genting Bukit Sembilan Estate (GBSE). Among implemented new technology as following: <ul style="list-style-type: none"> - Mechanical Assisted Fertilizer Application (MAF) Spreader - Mechanical Assisted Spraying (MAS – Tractor Mounted Sprayer) - Mechanical Platform Collection (MPC – Big Tractor Grabber) - Mechanical Assisted In-field Collection (MAIC – Mini Tractor Grabber & Mechanical Wheelbarrow) 	Complied
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.	Included the GBSE Annual Training Programme 2019 on operational subject adapting new industry standard/technology for harvesting, spraying, first aid and other relevant operational matter. Latest training was conducted on 28/3/2019 for Mechanical Wheelbarrow PB 250 potential handler.	Complied

Criterion / Indicator		Assessment Findings	Compliance
- Major compliance -			
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	<p>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.</p> <p>- Major compliance -</p>	<p>Implemented based on Sustainability Management Procedure for Consultation and Communication; SMP-GPB-17; Rev. 02; Date: 23/2/2018. Consultation & communication done through meetings, dialogs, engagement to both internal & external stakeholders and recorded in Genting Plantations Complaints/Grievance Record Book – Estate: GBSE. Latest briefing on procedure and policies was conducted on 18/7/2019. Sighted latest complaints received from internal stakeholder (harvester) (ref. # 126; dated 18/7/2019) on toilet piping blocking. Sighted immediate action taken accordingly. No any external complaints/grievances received from external stakeholder.</p> <p>Specific to Bukit Sembilan Estate – Procedure for Complaints and Grievances for Workers, Suppliers, Contractors and Other Stakeholders of Genting Bukit Sembilan Estate with Flow-Chart.</p>	Complied
4.2.1.2	<p>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.</p> <p>- Major compliance -</p>	<p>GBSE divided into 2 divisions with a total of 10 land titles/user rights as per sighted samples as following:</p> <p>Main Div.:</p> <ul style="list-style-type: none"> i) Title # 36096; Lot # 52; Area: 564.9902 ha ii) Title # 36097; Lot # 53; Area: 21.0368 ha <p>Paya Kamuniting Div.:</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		i) Title # GRN 197658; Lot # 3221; Area: 15.34 ha ii) Title # GRN 197658; Lot # 3199; Area: 3.818 ha <ul style="list-style-type: none"> • Area Statement as per Monthly Progress Report • Estate MPOB license # 508759002000; Validity: 1/6/2019-31/5/2020; Area reg.: 486.27 ha • Estate MPOB license # 508758102000; Validity: 1/6/2019-30/5/2020; Area reg.: 802.49 ha • CF for air receiver: KD PMT 4993 valid until 1/7/2020 • CePSWaM Certificate: CePSWaM/01714 • Permit for diesel is in progress. Latest communication was sighted (through BLESS system) on 9/7/2019. 	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	Implemented based on Sustainability Management Procedure for Consultation and Communication; SMP-GPB-17; Rev. 02; Date: 23/2/2018. Consultation & communication done through meetings, dialogs, engagement to both internal & external stakeholders and recorded in Genting Plantations Complaints/Grievance Record Book – Estate: GBSE. Sighted records of stakeholder meeting which was discuss the briefing to all stakeholder regarding RSPO, ISCC, MSPO compliance, dated 17/4/2019.	Complied
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance -	As per the letter of Appointment as Person-in-Charge for Traceability requirements as RSPO, ISC and MSPO Sustainability Standards. <ul style="list-style-type: none"> • Letter of Appointment as Sustainability Coordinator for ISCC, RSPO and MSPO Related Matters; dated 18/7/2019. Appointed person: Assistant Manager; by Manager GBSE 	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	Sighted list of Internal Stakeholders and List of External Stakeholders updated as on 5/7/2019 identified amongst all neighbouring estate, villagers, smallholders, suppliers, contractors, customer, NGO and etc. Latest external stakeholder consultation meeting was conducted on 17/4/2019 while consultation with internal (workers) stakeholders including briefing of procedure was conducted on 18/7/2019.	Complied
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance -	Established as Sustainability Management Procedure for Traceability; SMP-GPB-09; Rev. 02; Date: 14/8/2017.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	As per internal audit, implemented based on Sustainability Management Procedure of Internal Audit; SMP-GPB-03; Rev. 01; Date: 11/12/2013. Sighted Internal Audit Plan for the audit to be conducted from 10-11/7/2019 by Lead Auditor (P. Sivaji Raja) from Sustainability Department. 1 Major NCRs were raised for issues related to Scheduled Waste handling requirements. Sighted that all findings still in progress of corrective actions. It was found that for both NCRs and OBS, no specific MSPO indicators were referred to the findings. It will be better if MPSO indicators/clauses number to be included in the audit findings/reporting.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	<ul style="list-style-type: none"> As per the letter of Appointment as Person-in-Charge for Traceability requirements as RSPO, ISC and MSPO Sustainability Standards. Letter of Appointment as Sustainability Coordinator for ISCC, RSPO and MSPO Related Matters; dated 18/7/2019. Appointed person: Assistant Manager; by Manager GBSE 	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	<p>Sighted the records for FFB dispatch as follow:</p> <ol style="list-style-type: none"> FFB Delivery Advice: 4165, date: 26/6/19, Field: 94A, P00B, 96B, Mill: Solid Orient Holdings Sdn Bhd, W/B No: 212079, Weight: 15300kg FFB Delivery Advice: 0308, date: 29/6/19, Field: 93B1, 96A, 94B2, 04C3, Mill: KKS Sg Dingin, W/B No: 212000, Weight: 16790kg FFB Despatch Note: FFB1900152W, date: 27/6/19, Field: 94B1, P15, Mill: Setia Kawan Kilang Kelapa Sawit Sdn Bhd, W/B No: 115328, Weight: 14990kg 	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	A mechanism to ensure compliance to legal and other requirement has been documented in Sustainability Management Procedure Manual – Legal Requirement Register (SMP-GPB-22; Revision 07 dated 19/04/2019) and the Sustainability Management Procedure Manual – Procedures on Regional, National and International Laws (SMP-GPB-21; Revision 01 dated 14/08/2014).	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		Sustainability Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance.	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	List of applicable legal and other requirements was made available during the assessment and compiled in the Sustainability Management Procedure Manual – Legal Requirement Register (SMP-GPB-22; Revision 07 dated 19/04/2019) and the Sustainability Management Procedure Manual – Procedures on Regional, National and International Laws (SMP-GPB-21; Revision 01 dated 14/08/2014). As to date, Genting Bukit Sembilan Estate (GBSE) had complied with all the applicable local, state, national and ratified international laws and regulations.	Complied
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. - Major compliance -	All the legal and other requirements were register accordingly in the legal requirement register including Minimum Wages Order 2018. The evaluation was last carried out on 19/04/2019 by Assistant Manager and approved by the Estate Manager.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance -	Letter of Appointment as Sustainability Coordinator for ISCC, RSPO and MSPO Related Matters; dated 18/7/2019. Appointed person: Assistant Manager; by Manager GBSE	Complied
Criterion 4.3.2 – Lands use rights			

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	GBSE divided into 2 divisions with a total of 10 land titles/user rights as per sighted samples as following: <ul style="list-style-type: none"> • Main Div.: <ul style="list-style-type: none"> i) Title # 36096; Lot # 52; Area: 564.9902 ha ii) Title # 36097; Lot # 53; Area: 21.0368 ha • Paya Kamuniting Div.: <ul style="list-style-type: none"> iii) Title # GRN 197658; Lot # 3221; Area: 15.34 ha iv) Title # GRN 197658; Lot # 3199; Area: 3.818 ha 	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	GBSE divided into 2 divisions with a total of 10 land titles/user rights as per sighted samples as following: <ul style="list-style-type: none"> • Main Div.: <ul style="list-style-type: none"> i) Title # 36096; Lot # 52; Area: 564.9902 ha ii) Title # 36097; Lot # 53; Area: 21.0368 ha • Paya Kamuniting Div.: <ul style="list-style-type: none"> iii) Title # GRN 197658; Lot # 3221; Area: 15.34 ha iv) Title # GRN 197658; Lot # 3199; Area: 3.818 ha 	Complied
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	As per indicator 4.2.1.2, GBSE established a Boundary Stone Maintenance and Management Programme; Dated 26/6/2019. Programmes included replace missing stones, repainting & numbering, patrolling and etc.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	Established as Sustainability Management Procedure for Negotiation, Compensation and Handling Procedure; SMP-GPB-18; Rev. 03; Date: 29/12/2017. No disputes recorded.	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	No customary rights issue.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. - Minor compliance -	No customary rights issue.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	No customary rights issue.	Complied
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.	Social impact identified as per documented RSPO & MSPO Social Impact Assessment (SIA) and Human Rights Impact Assessment	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator	Assessment Findings	Compliance										
<p>- Minor compliance -</p>	<p>(HRIM) Report, Genting Bukit Sembilan Estate (GBSE); Date: 2-5/7/2019. Report prepared by Sustainability Department dated 12/7/2019. The SIA study summarize few key areas findings as following samples:</p> <table border="1" data-bbox="1048 592 1868 1150"> <thead> <tr> <th>SIA Key Areas</th> <th>Findings</th> </tr> </thead> <tbody> <tr> <td>Economic livelihood/quality of life</td> <td>- Minimum wage met - No land disputes - New generation (local) not interested to work in plantation</td> </tr> <tr> <td>Environment</td> <td>The estate road is dusty due to dry weather</td> </tr> <tr> <td>Health & wellbeing</td> <td>- Health screening prior to employment/FOMEMA compliance</td> </tr> <tr> <td>Community, families and individuals</td> <td>- No issue</td> </tr> </tbody> </table> <p>Social Management and Monitoring Plan of Genting Bukit Sembilan Estate (GBSE) dated 23/7/2019 was established as per following samples:</p> <ul style="list-style-type: none"> - Continues monitoring on estate drain near the Solid Orient Mill - To budget for the street lighting 	SIA Key Areas	Findings	Economic livelihood/quality of life	- Minimum wage met - No land disputes - New generation (local) not interested to work in plantation	Environment	The estate road is dusty due to dry weather	Health & wellbeing	- Health screening prior to employment/FOMEMA compliance	Community, families and individuals	- No issue	
SIA Key Areas	Findings											
Economic livelihood/quality of life	- Minimum wage met - No land disputes - New generation (local) not interested to work in plantation											
Environment	The estate road is dusty due to dry weather											
Health & wellbeing	- Health screening prior to employment/FOMEMA compliance											
Community, families and individuals	- No issue											

Criterion / Indicator		Assessment Findings	Compliance
		- Continuous training of workers on MSPO & RSPO	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	As per indicator 4.2.2.1 – 4.2.2.3 above, implemented based on Sustainability Management Procedure for Consultation and Communication; SMP-GPB-17; Rev. 02; Date: 23/2/2018. Consultation & communication done through meetings, dialogs, engagement to both internal & external stakeholders and recorded in Genting Plantations Complaints/Grievance Record Book – Estate: GBSE. Sighted records of stakeholder meeting which was discuss the briefing to all stakeholder regarding RSPO, ISCC, MSPO compliance, dated 17/4/2019.	Complied
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	As per indicator 4.2.2.1 – 4.2.2.3 above, disputes to be resolve as per External Stakeholder Consultation and Communication Meeting MSPO/RSPO & ISCC Principles and Criteria; Dated 17/4/19. (Proc. SMP-GPB-19; Rev. 03; Date: 21/3/2018) – Pihak Pengurusan membantu mencatatkan aduan/kilanan lisan dalam Buku Aduan dan Kilanan. However, complaints/grievances mentioned raised during stakeholders meeting conducted on 28/3/2019 (external) and 29/3/2019 (internal) were not being recorded in the book as per procedure. Hence, no evidence of effective, timely and acceptance of action taken to resolve disputes. Based on following evidence/requirements:	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<p>- Report on External Stakeholder Consultation and Communication Meeting MSPO/RSP0 & ISCC Principles and Criteria; Dated 28/3/2019</p> <p>-Internal Stakeholder Consultation and Communication Meeting MSPO/RSP0 & ISCC Principles and Criteria; Dated 29/3/2019</p> <p>- Procedure: Complaints and Grievances; SMP-GPB-19; Rev. 03; Date: 21/3/2018</p> <p>A major noncompliance has been raised on the matter.</p>	
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p>- Minor compliance -</p>	<p>Complaints form available in the form of Complaint Book as per Report on Internal Stakeholder Consultation and Communication Meeting MSPO/RSP0 & ISCC Principles and Criteria.</p>	Complied
4.4.2.4	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p> <p>- Minor compliance -</p>	<p>Employees and surrounding communities were made aware on the matter as per Report on Internal Stakeholder Consultation and Communication Meeting MSPO/RSP0 & ISCC Principles and Criteria; Dated 17/4/2019.</p>	Complied
4.4.2.5	<p>Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.</p> <p>- Major compliance -</p>	<p>Except for findings above, records available as per Report on Internal Stakeholder Consultation and Communication Meeting MSPO/RSP0 & ISCC Principles and Criteria; Dated 17/4/19.</p>	Complied
<p>Criterion 4.4.3: Commitment to contribute to local sustainable development</p>			

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.4.3.1	<p>Growers should contribute to local development in consultation with the local communities.</p> <p>- Minor compliance -</p>	<p>Contributions made based on consultation as per Summary of Corporate Social Responsibility Summary:</p> <ul style="list-style-type: none"> • Oil Palm knowledge sharing with UiTM students • Temple festival • "Jamuan Buka Puasa" • Donation- Mini sport for SRK(T) Bukit Sembilan Estate • Hari Raya celebration 	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Established based on Risk Management and Risk Assessment; SMP-GPB-08; Rev. 00; Date: 11/10/2013 as OSH Management Plan 2019 that includes OSH Objectives, targets & Programs, OSH Policy – communication & implementation and training plan. Sighted table of OSH Action Plan & Strategies for main activities & areas amongst all includes the Agrochemicals on Plantations, Harvesting Operation, Machine Operators (farm tractors), FFB Lorry Drivers, Workshop Operation, Usage of PPE & training. Also included the details of OSH Budget to be utilized for year 2019 includes OSHA training, poster/signboard, OSHA meeting, fire extinguisher and etc.</p>	Complied
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>	<p>Occupational Safety and Health Manual for Plantation Division (OM-GPB-01; Revision 0 dated 01/01/2010) prepared by JKPP IS 127/438/2/3246, approved by the Executive Vice President were made available.</p> <p>Topics covered were:</p> <ol style="list-style-type: none"> 1. Notification and investigation of accidents at workplaces 2. Personal Protective Equipment 	Complied

Criterion / Indicator	Assessment Findings	Compliance
<ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall 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). 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. 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. 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. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. 	<ul style="list-style-type: none"> 3. Occupational safety and health program 4. Emergency Response Plan 5. OSH Signages 6. OSH Committee 7. HIRARC 8. Pesticides usage 9. OSH documentation management 10. USECHH 2000 (Hazardous Chemical Handling) <p>GBSE has established a Hazard Identification Risk Assessment Risk Control (HIRARC) reviewed by Assistant Manager and approved by Estate Manager.</p> <p>Genting Bukit Sembilan Estate Annual Training Programme & Safety Meeting for 2019 were available. GBSE conducts a periodic training for employees.</p> <p>GBSE management has appointed the OSH Committee for 2018/2019 consisting of representatives from employer and employee. The OHS Chairman and Secretary are in coordination with the Sustainability Dept for any updates on national regulations and collective agreements.</p> <p>During site visit to the chemical store, premix area, fertilizers store and clinic, the respective sites are equipped with first aid box, fire extinguisher, important contact number and flowchart of emergency procedures.</p> <p>Interview with worker, found they are able to explain and demonstrate steps of precaution on incidence, such as first aid action to be taken, spills handling and reporting.</p>	

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	<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>- Major compliance -</p>	<p>The Hospital Assistance is the key person as first aider and supported by estate staff whom been trained by him. Sighted the training record for first aiders. The First Aid Kit equipped with approved contents available at one of the worksite. The last inspection for first aid kit was done in July 2019.</p> <p>The OSH Committee has records of accidents happened and will evaluate it during the OSH quarter meeting, which was latest conducted on 28/6/2019. There was 2 accident cases reported in 2019. All the report was sighted and prepared accordingly.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	Policy sighted as above; People Policy; Rev. 00; Date: 3/8/2009.	Complied
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>- Major compliance -</p>	As above.	Complied
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed</p>	The template for work agreements been used was revised by Genting HR as "Perjanjian Pekerjaan"; HRAD WM Rev4 Date: 7/1/2019. All terms and conditions in the work agreements were based on latest	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>applicable requirements as per Labour Act 1955, MAPA/NUPW Agreement and Minimum Wage Order 2018 (Amendment).</p> <p>Samples of work agreements sighted and checked as following:</p> <ul style="list-style-type: none"> - Employee # 26709; Joined date: 6/1/2018; Post: Harvester - Employee # 02559; Joined date: 10/1/2019; Post: Harvester - Employee # 26697; Joined date: 28/5/15; Post: Weeder - Employee # 26708; Joined date: 6/1/2018; Post: Weeder - Employee # 02540; Joined date: 21/2/2018; Post: Harvester - Employee # 02407; Joined date: 8/5/2003; Post: Weeder - Employee # 02436; Joined date: 3/7/2012; Post: Weeder - Employee # 02537; Joined date: 2/2/2018; Post: Harvester - Employee # 02472; Joined date: 5/10/2011; Post: Harvester - Employee # 02533; Joined date: 14/11/2017; Post: Harvester 	
<p>4.4.5.4 Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>Contractors and their employees were employed in harvesting operation including for FFB transporters and palm tree felling & chipping of replanting machinery operator.</p> <p>Sighted the following sample GBSE signed 3 types of agreements:</p> <ol style="list-style-type: none"> 1. Agreement for Fresh Fruit Bunch (FFB) Harvesting (GBSE/HC/19/01/02), dated 1/1/2019 with Megatani Utara Enterprise 2. Agreement for loading and transporting of Fresh Fruit Bunch (FFB) and Loose Fruit (GBSE/TR/19/01/01), dated 1/1/2019 with J.M Enterprise. <p>In all agreements, it was mentioned that in accordance with RSPO, ISCC and MSPO requirements the contractor shall submit the following:</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		i) Copies of passport or work permit together with the job description work agreement ii) Copy of each workers' pay advice iii) Copy of insurance policy for contractors' workers Sighted that the estate kept all records accordingly. However consistency of records to be maintained needs further improvements. Samples of work agreements sighted and checked as following: - Passport No:Bxxxx819; Post: Harvester - Passport No:Bxxxx817; Post: Harvester - Passport No:ATxxxx30; Post: Harvester -	
4.4.5.5	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. - Major compliance -	There is a list of employees consist of employee number, name, division, pay, NRIC/Passport no, employment category, nationality, DOB, age, race and status in the namelist of foreign workers existing in West Malaysia (as at 11/7/2019).	Complied
4.4.5.6	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.	Employment contracts for checkroll and contract workers were acknowledged and kept a copy by the workers verified through interviewed with the workers. The contract was in the language that understood by the workers. The terms and conditions were clearly	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>stated in the contract such as salary, annual leaves and public holiday entitlement. Sampled of employment contracts as below:</p> <ul style="list-style-type: none"> - Employee # 26709; Joined date: 6/1/2018; Post: Harvester - Employee # 02559; Joined date: 10/1/2019; Post: Harvester - Employee # 26697; Joined date: 28/5/15; Post: Weeder - Employee # 26708; Joined date: 6/1/2018; Post: Weeder - Employee # 02540; Joined date: 21/2/2018; Post: Harvester - Employee # 02407; Joined date: 8/5/2003; Post: Weeder - Employee # 02436; Joined date: 3/7/2012; Post: Weeder - Employee # 02537; Joined date: 2/2/2018; Post: Harvester - Employee # 02472; Joined date: 5/10/2011; Post: Harvester - Employee # 02533; Joined date: 14/11/2017; Post: Harvester 	
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	<p>Based on the sampled pay slips of workers [each nationality of 3 months' pay slip], there is no trace of breach of payment as stipulated in their contract.</p> <p>Interview with workers shows no issue on wages received.</p> <p>During site visit, interview with both local and foreign workers revealed no discrimination on overtime hours as well on wages received for overtime work done.</p> <p>This was also cross checked in their respective payslips and no discrepancies found.</p> <p>GBSE has implemented the Pocket checkroll for overtime time recording.</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.8	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations 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>- Major compliance -</p>	<p>Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Malaysia Employment Act 1955.</p> <p>As at current status, there was none has crossed 80 hours of overtime. Verified the payslips, the payment and calculation of overt time well distributed.</p> <p>The overtime rate after 8 hours daily rated is: upkeeping</p> <ul style="list-style-type: none"> • Mon - Sat – daily rated / 8 hours x 1.5 • Sunday - daily rated / 8 hours x 2.0 • Public holiday – daily rated / 8 hours x 3.0 <p>The overtime rate after 8 hours piece rated is: harvesters</p> <ul style="list-style-type: none"> • Mon - Sat – flat rate • Sunday – flat rate x 2.0 • Public holiday – flat rate x 3.0 	Complied
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p>	<p>Salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker.</p> <p>Workers interviewed confirmed that they are being paid more than the stipulated minimum wage and that they understand all the deductions being made.</p> <p>Sampled 3 months' payslip (Aug 18, Nov 18 and Apr 19) for:</p> <ul style="list-style-type: none"> - Employee # 26709; Joined date: 6/1/2018; Post: Harvester - Employee # 02559; Joined date: 10/1/2019; Post: Harvester 	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Employee # 26697; Joined date: 28/5/15; Post: Weeder - Employee # 26708; Joined date: 6/1/2018; Post: Weeder - Employee # 02540; Joined date: 21/2/2018; Post: Harvester - Employee # 02407; Joined date: 8/5/2003; Post: Weeder - Employee # 02436; Joined date: 3/7/2012; Post: Weeder - Employee # 02537; Joined date: 2/2/2018; Post: Harvester - Employee # 02472; Joined date: 5/10/2011; Post: Harvester - Employee # 02533; Joined date: 14/11/2017; Post: Harvester 	
4.4.5.10	<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>- Minor compliance -</p>	<p>The management provided free medical facilities to all the workers and dependents. The company also subsidized water and electricity to certain units.</p>	Complied
4.4.5.11	<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>- Major compliance -</p>	<p>Linesite inspection was carried out on weekly basis by Hospital Assistant and Assistant in Genting Bukit Sembilan Estate. The last inspection was carried out on 19/7/2019 for Main Div and 20/7/2019 for Paya Kamunting Div. The inspection was conducted on weekly basis.</p>	Complied
4.4.5.12	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>Appointment Letter (Surat Iantikan) – as Women Committee Chairman Member dated 1/2/2017 (Chief Clerk).</p> <p>The latest meeting with woman association in GBSE was done on 15/4/2019 as per "Minit Mesyuarat Persatuan Wanita Dan Kanak-Kanak" sighted.</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.5.13 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>- Major compliance -</p>	<p>The Genting Plantations Group "People Policy" signed by Mr Yong Chee Kong, CEO dated 03/08/2017 clearly states that no one shall be denied of their rights, freedom of association and equal opportunities.</p>	<p>Complied</p>
<p>4.4.5.14 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>- Major compliance -</p>	<p>There is a Genting Plantations Social Policy on Child Protection dated on 22/06/2015.</p> <p>During site visit to field and line site, there was no evidence found of workers below 18 years old. Workers are aware of the minimum age policy is being strictly enforced by the management at which the age limit is above 18 years old.</p>	<p>Complied</p>
<p>Criterion 4.4.6: Training and competency</p>		
<p>4.4.6.1 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.</p>	<p>Sighted the Genting Bukit Sembilan Training Programme For 2019. Training programme planned for year 2019 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to:</p> <ul style="list-style-type: none"> - harvesters 	<p>Complied</p>

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance																										
	- Major compliance -	<p>- pesticides operators - manurers</p> <p>The records of training were available at mill and estate office. Sample training checked:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>18/7/19</td> <td>Company policy briefing</td> <td rowspan="12">Genting Bukit Sembilan Estate</td> </tr> <tr> <td>11/6/19</td> <td>Tractor driving training</td> </tr> <tr> <td>16/7/19</td> <td>OSH Training</td> </tr> <tr> <td>15/7/19</td> <td>Fire Fighting</td> </tr> <tr> <td>15/7/19</td> <td>Training for Weeding</td> </tr> <tr> <td>15/7/19</td> <td>Training for buffer zone</td> </tr> <tr> <td>16/7/19</td> <td>HCV Training</td> </tr> <tr> <td>16/7/19</td> <td>Harvesting training</td> </tr> <tr> <td>20/6/19</td> <td>First aid training</td> </tr> <tr> <td>4/4/19</td> <td>IPM Training</td> </tr> <tr> <td>11/4/19</td> <td>Chemical handling</td> </tr> </tbody> </table>	Date	Training	Remark	18/7/19	Company policy briefing	Genting Bukit Sembilan Estate	11/6/19	Tractor driving training	16/7/19	OSH Training	15/7/19	Fire Fighting	15/7/19	Training for Weeding	15/7/19	Training for buffer zone	16/7/19	HCV Training	16/7/19	Harvesting training	20/6/19	First aid training	4/4/19	IPM Training	11/4/19	Chemical handling	
Date	Training	Remark																											
18/7/19	Company policy briefing	Genting Bukit Sembilan Estate																											
11/6/19	Tractor driving training																												
16/7/19	OSH Training																												
15/7/19	Fire Fighting																												
15/7/19	Training for Weeding																												
15/7/19	Training for buffer zone																												
16/7/19	HCV Training																												
16/7/19	Harvesting training																												
20/6/19	First aid training																												
4/4/19	IPM Training																												
11/4/19	Chemical handling																												
4.4.6.2	<p>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.</p> <p>- Major compliance -</p>		<p>A formal training programme on all aspects of MSPO was been established and implemented. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs were reviewed and found to be complied.</p> <p>Training programme planned for year 2018 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to:</p> <ul style="list-style-type: none"> - harvesters - pesticides operators 	Complied																									

Criterion / Indicator		Assessment Findings	Compliance
		- manurers	
4.4.6.3	<p>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.</p> <p>- Minor compliance -</p>	<p>A formal training programme on all aspects of MSPO was been established and implemented. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs were reviewed and found to be complied.</p> <p>Training programme planned for year 2018 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to:</p> <ul style="list-style-type: none"> - harvesters - pesticides operators - manurers 	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	<p>An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>The Genting Plantations "Environment Policy" was established. The policy was signed by Mr Yong Chee Kong, CEO on 05/10/2009.</p> <p>The GBSE environmental improvement and management plan has been established to monitor the identified significant activities that give impacts on environment. The Assistant Manager has been appointed to do the monitoring to ensure the plan is effectively implemented.</p>	Complied
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p>	<p>An environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>b) The aspects and impacts analysis of all operations.</p> <p>- Major compliance -</p>	<p>This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. Last reviewed was done on 18/7/2019.</p> <p>Appointment as Environmental Committee Member – Environmental Performance Monitoring Committee.</p>	
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>Based on Sustainability Management Procedure Manual; Doc. # SMP-GPB-29; Rev. 01; Date: 6/6/2018. Established in EAI Register</p>	Complied
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>Programs conducted including 3R campaign and provision of 3R bins within office and housing area, waste segregation, monitoring of river water sample analysis and etc.</p>	Complied
4.5.1.5	<p>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.</p> <p>- Major compliance -</p>	<p>The Genting Bukit Sembilan Estate Annual Training Programme & Safety Meeting includes environmental awareness and compliance related trainings to the executives, staffs and workers. Continuous awareness training program eq. Riparian Training has been carried out on 5/4/2019 by the company to its workers and other stakeholders.</p>	Complied
4.5.1.6	<p>Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>Environmental related matters were discussed during morning muster calls.</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance														
		<p>Workers interview reveal that they are encouraged to discuss environmental issues with the management.</p> <p>Continuous awareness training through the Understanding and Awareness of the Company's Policy training upon meeting has been carried out on 12/3/2019 by the company to its workers and other stakeholders.</p>															
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																	
4.5.2.1	<p>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.</p> <p>- Major compliance -</p>	<p>GBSE maintains records of energy usage, which is reported monthly to head office. The use of the fossil fuel against the FFB production is being monitored.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Year</th> <th>Diesel/ mt FFB</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Genting Bukit Sembilan Estate (GBSE)</td> <td>2015</td> <td>0.57 ltrs/mt</td> </tr> <tr> <td>2016</td> <td>1.10 ltrs/mt</td> </tr> <tr> <td>2017</td> <td>1.06 ltrs/mt</td> </tr> <tr> <td>2018</td> <td>1.36 ltrs/mt</td> </tr> <tr> <td>2019</td> <td>0.58 ltrs/mt (as of June 2019)</td> </tr> </tbody> </table>	Estate	Year	Diesel/ mt FFB	Genting Bukit Sembilan Estate (GBSE)	2015	0.57 ltrs/mt	2016	1.10 ltrs/mt	2017	1.06 ltrs/mt	2018	1.36 ltrs/mt	2019	0.58 ltrs/mt (as of June 2019)	Complied
Estate	Year	Diesel/ mt FFB															
Genting Bukit Sembilan Estate (GBSE)	2015	0.57 ltrs/mt															
	2016	1.10 ltrs/mt															
	2017	1.06 ltrs/mt															
	2018	1.36 ltrs/mt															
	2019	0.58 ltrs/mt (as of June 2019)															
4.5.2.2	<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>- Major compliance -</p>	<p>GBSE have estimation on total energy required. This estimation was compared to the actual usage by monthly and reported to the head office for monitoring.</p>	Complied														

Criterion / Indicator		Assessment Findings	Compliance
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	No renewable energy applied at GBSE.	Complied
Criterion 4.5.3: Waste management and disposal			
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	<p>Visit to GBSE facilities showed that all waste products and sources of pollution were identified and documented.</p> <p>The documentation and identification of all the waste products such as scheduled waste, domestic waste and recyclable waste such as metal, plastic, mill waste and polluting materials e.g. EFB were maintained and monitored.</p> <p>Scheduled Waste identified included SW305, SW312, SW404, SW408, SW409 and SW410. Records on the usage and disposal were well recorded and documented.</p> <p>Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be maintained.</p>	Complied
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p>	<p>Documented Waste Management Plan dated 5/4/2019 was established where the site visit confirmed that the practice of reduce, reuse and recycle of materials has been implemented.</p> <p>Segregation of wastes i.e. general wastes and scheduled wastes was verified to be satisfactory. Proper storage areas were identified for the storage of the recyclable wastes at the estate.</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.5.3.3	<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>- Major compliance -</p>	<p>Based on Sustainability Management Procedure Manual established as following titles:</p> <ul style="list-style-type: none"> i) Scheduled Waste Management; doc. # SMP-GPB-11; Rev. 01; Dated 5/6/2018 ii) Landfill and Domestic Waste Management; Rev. 01; Doc. # SMP-GPB-12; Rev. 12; Dated 1/12/2014 iii) Recyclable Waste Management; Rev. 0; Doc. # SMP-GPB-13; dated 11/10/2013 	Complied
4.5.3.4	<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>- Major compliance -</p>	<p>Empty pesticide containers were sent to be recycled. The latest disposal was done on 10/7/2019 by G-Planter Sdn Bhd. Total containers disposed as follow:</p> <ul style="list-style-type: none"> 1. Plastic pesticide containers (4 litres) – 109 pcs 2. Plastic pesticide containers (20 litres) – 102 pcs 3. Plastic pesticide containers (500 gram) – 36 pcs 	Complied
4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p>	<p>The management used to segregate the waste, i.e. general wastes and scheduled wastes was verified to be satisfactory. Other domestic waste was disposed in the landfill at field 2005.</p>	Complied
Criterion 4.5.4: Reduction of pollution and emission			

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment, identified source was from the estate activities. Current monitoring for scheduled waste was through regular monitoring which conducted as per requirement. The latest disposal was done on 15/7/2019 by Kualiti Alam for sample i.e. SW305 (Consignment # 20190715161FNPZD) and SW410 (Consignment # 2019071516XC58KG). All the records were found adequate as per required by EQ (SW) Regulations 2005.	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The Waste Management Plan - GBSE has been integrated into the Significant Pollutants and GHG Emission – Reduction/Minimization Plan which is being reviewed on yearly basis, last reviewed was done on 5/4/2019 by Estate Manager. The plan was monitored regularly.	Complied
Criterion 4.5.5: Natural water resources			
4.5.5.1	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.	The GBSE water management plan dated 18/7/2019 was established. The plan was implemented and monitored on monthly basis by the Estate Manager. The following parameters (BOD, TSS, Ammonical Nitrogen, Total Nitrogen, Oil & Grease, pH, COD, Total Suspended Solids) are checked by accredited Lab i.e., Union Laboratories Sdn Bhd, Penang. Sighted the certificate of analysis for water samples (inlet and outlet) from lab, Test report # 03J0221; Date: 19/3/2019.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, 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>- Major compliance -</p>		
<p>4.5.5.2 No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p>- Minor compliance -</p>	<p>There is no construction of bunds, weirs and dams across main rivers or waterways passing through GBSE estate.</p>	<p>Complied</p>
<p>4.5.5.3 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>- Minor compliance -</p>	<p>Water harvesting practices was implemented. It was used for washing compound at estate office.</p>	<p>Complied</p>
<p>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</p>		

Criterion / Indicator		Assessment Findings	Compliance				
4.5.6.1	<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> <ul style="list-style-type: none"> a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (<i>e.g.</i> 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>- Major compliance -</p>	<p>The Inventory of HCV Sites within Genting Plantations Berhad Group of Estates (Northern Region) has been conducted on 27/3/2010 by Dr Yap Son Kheong.</p> <p>Report shown there's a presence of HCV 4.2 and HCV 6</p>	Complied				
4.5.6.2	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <ul style="list-style-type: none"> a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. <p>- Major compliance -</p>	<p>Their management plan such as:</p> <table border="1"> <thead> <tr> <th>HCV</th> <th>Management Plan</th> </tr> </thead> <tbody> <tr> <td>4.2</td> <td> <p>Protection of steep area by prescribing no disturbance to the vegetation and no planting for the next cycle.</p> <p>Land and Vegetation cover should be well maintained</p> <p>Established buffer zone</p> <p>Avoid weeding and manuring activities</p> </td> </tr> </tbody> </table>	HCV	Management Plan	4.2	<p>Protection of steep area by prescribing no disturbance to the vegetation and no planting for the next cycle.</p> <p>Land and Vegetation cover should be well maintained</p> <p>Established buffer zone</p> <p>Avoid weeding and manuring activities</p>	Complied
HCV	Management Plan						
4.2	<p>Protection of steep area by prescribing no disturbance to the vegetation and no planting for the next cycle.</p> <p>Land and Vegetation cover should be well maintained</p> <p>Established buffer zone</p> <p>Avoid weeding and manuring activities</p>						

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings		Compliance
			Place signages on HCV area	
		6	Erect proper fencing and signage Maintain and upkeep of the area Training and briefing	
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. - Major compliance -	The Genting Plantations GBSE Environment Improvement & Management plan dated 4/4/2019 on the protection of HCV areas is available. HCV monitoring tool within GBSE dated 5/4/2019 is available.		Complied
Criterion 4.5.7: Zero burning practices				
4.5.7.1	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. - Major compliance -	It was noted that "Zero Burning Policy" signed by Mr Yong Chee Kong (President & CEO) dated 10/08/2011 implemented. Management complying with the Malaysian environmental law –EQA and Regulations 1974. No open burning noted during the field visit. However, use of open fire was not fully avoided not in specific situations as identified in regional best practice. Hence, a major noncompliance has been raised on the matter.		Complied
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where	No use of fire for land preparation during replanting.		Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	there is a significant risk of disease spread or continuation into the next crop. - Major compliance -		
4.5.7.3	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. - Major compliance -	No use of fire for land preparation during replanting.	Complied
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	No use of fire for land preparation during replanting.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Based on Sustainability Management Manuals, Procedures and Policies (RSPO, MSPO and ISCC) Document Masterlist; form # SMP-GPB-01-F01-01; updated 15/8/2014, a set of policies, procedures and manuals have been established as best management practices for all activities related to mill and estate operations. And SOP Genting Peninsular Malaysia Estates; Revision 2 – December 2010	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		Sighted Internal Audit report conducted from 10-11/7/2019 by Lead Auditor (P. Sivaji Raja) from Sustainability Department. 5 Major NCRs were raised. Sighted that all findings still in progress of closure.	
4.6.1.2	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 either soil, nutrients or chemicals. - Major compliance -	Landscapes of GBSE are mostly undulating, flat, rolling and hilly. No planting within areas more than 25 degrees in GBSE.	Complied
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	Landscapes of GBSE are mostly undulating, flat, rolling and hilly. No planting within areas more than 25 degrees in GBSE.	Complied
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	GBSE has continued its commitment to long term sustainability and improvements through a capital expenditure program. Sighted the latest GBSE Summary of Capital Expenditure Costs for Fiscal Year 2019 (01/01/2019 to 31/12/2019). Sighted part of the approved CAPEX. GBSE have made progress towards achieving their performance production targets for the current financial year.	Complied

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>- Major compliance -</p>	<p>GBSE proposed replanting programme for 2019 to 2023 is available. Based on the plan, 103.74ha planned for 2019, 117.58 ha (2020), 83.02 ha (2021), 99.56 ha (2022) and 81.38 ha (2023).</p>	Complied
4.6.2.3	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production : cost per tonne of FFB d) Price forecast e) e) Financial indicators : cost benefit, discounted cash flow, return on investment <p>- Major compliance -</p>	<p>GBSE have made progress towards achieving their performance production targets for the current financial year.</p> <p>The plan includes age profile, yield projection, cost per tonne of FFB production and etc.</p>	Complied
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>- Major compliance -</p>	<p>GBSE monitors the estate performance against the targets. It also recommends changes to the plans if necessary.</p>	Complied
<p>Criterion 4.6.3: Transparent and fair price dealing</p>			

MSPO Public Summary Report
Revision 0 (Aug 2017)



Criterion / Indicator		Assessment Findings	Compliance
4.6.3.1	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p>- Major compliance -</p>	<p>The pricing method for FFB transporter has been clearly stated as follow:</p> <ol style="list-style-type: none"> 3. Agreement for Fresh Fruit Bunch (FFB) Harvesting (GBSE/HC/19/01/02), dated 1/1/2019 with Megatani Utara Enterprise 4. Agreement for loading and transporting of Fresh Fruit Bunch (FFB) and Loose Fruit (GBSE/TR/19/01/01), dated 1/1/2019 with J.M Enterprise. 	Complied
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>Fair contracts were transparently agreed and paid in timely manner as per sample sighted as following:</p> <ol style="list-style-type: none"> 1. Agreement for Fresh Fruit Bunch (FFB) Harvesting (GBSE/HC/19/01/02), dated 1/1/2019 with Megatani Utara Enterprise 2. Agreement for loading and transporting of Fresh Fruit Bunch (FFB) and Loose Fruit (GBSE/TR/19/01/01), dated 1/1/2019 with J.M Enterprise. <p>Payment sample:</p> <ol style="list-style-type: none"> i) Cheque voucher # 06/07; Contractor: Megatani Utara Enterprise; Date: 5/7/2019 ii) Invoice No: # GBSECI00000296; Contractor: JM Enterprise; Date: 30/6/2019 	Complied
Criterion 4.6.4: Contractor			

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	GBSE have initiated the MSPO awareness to all its contractors. The briefing was done during stakeholder consultation on 17/4/2019.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Agreed contracts sighted as per following sample of agreements: i) Agreement for Fresh Fruit Bunch (FFB) Harvesting (GBSE/HC/19/01/02), dated 1/1/2019 with Megatani Utara Enterprise ii) Agreement for loading and transporting of Fresh Fruit Bunch (FFB) and Loose Fruit (GBSE/TR/19/01/01), dated 1/1/2019 with J.M Enterprise.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	GBSE has no objection to allow BSI auditors to verify the assessment through physical inspection if required.	Complied
4.6.4.4	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. - Major compliance -	Control points applicable being observed by estate management as per sighted sample agreements as following: i) Agreement for Fresh Fruit Bunch (FFB) Harvesting (GBSE/HC/19/01/02), dated 1/1/2019 with Megatani Utara Enterprise ii) Agreement for loading and transporting of Fresh Fruit Bunch (FFB) and Loose Fruit (GBSE/TR/19/01/01), dated 1/1/2019 with J.M Enterprise.	Complied

Criterion / Indicator	Assessment Findings	Compliance
4.7 Principle 7: Development of new planting		
Principle 7 not applicable due to no new planting involved in Genting Bukit Sembilan Estate (GBSE).		

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment Genting Bukit Sembilan Estate Certification Unit complies with the MS 2530-3:2013. It is recommended that the certification of Genting Bukit Sembilan Estate Certification Unit is continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Arunan Kandasamy	Name: Mohd Hafiz Bin Mat Hussain
Company name: Genting Plantations Berhad	Company name: BSI Services Malaysia Sdn. Bhd.
Title: Senior Vice President-Plantation	Title: Lead Auditor
Signature:  Genting Plantations Berhad (34993-X) 13/08/19 ARUNAN KANDASAMY Senior Vice President PLANTATION (MALAYSIA)	Signature: 
Date:	Date: 06/08/2019

Appendix A: Assessment Plan

Date	Time	Subjects	MH
Wednesday 24/07/2019	0830-0900	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). 	√
	0900–1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√
		Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√
	1230–1330	Lunch	√
	1330–1600	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/ workers representatives, new planting, CIP and implementation etc).	√
	1600-1700	Interim closing briefing	√
Thursday, 25/07/2019	0830–1230	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/ workers representatives, new planting, CIP and implementation etc).	√
	1230–1330	Lunch	√
	1330–1600	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/ workers representatives, new planting, CIP and implementation etc).	√
	1600-1700	Preparation for closing meeting	√
	1700–1730	Closing Meeting	√

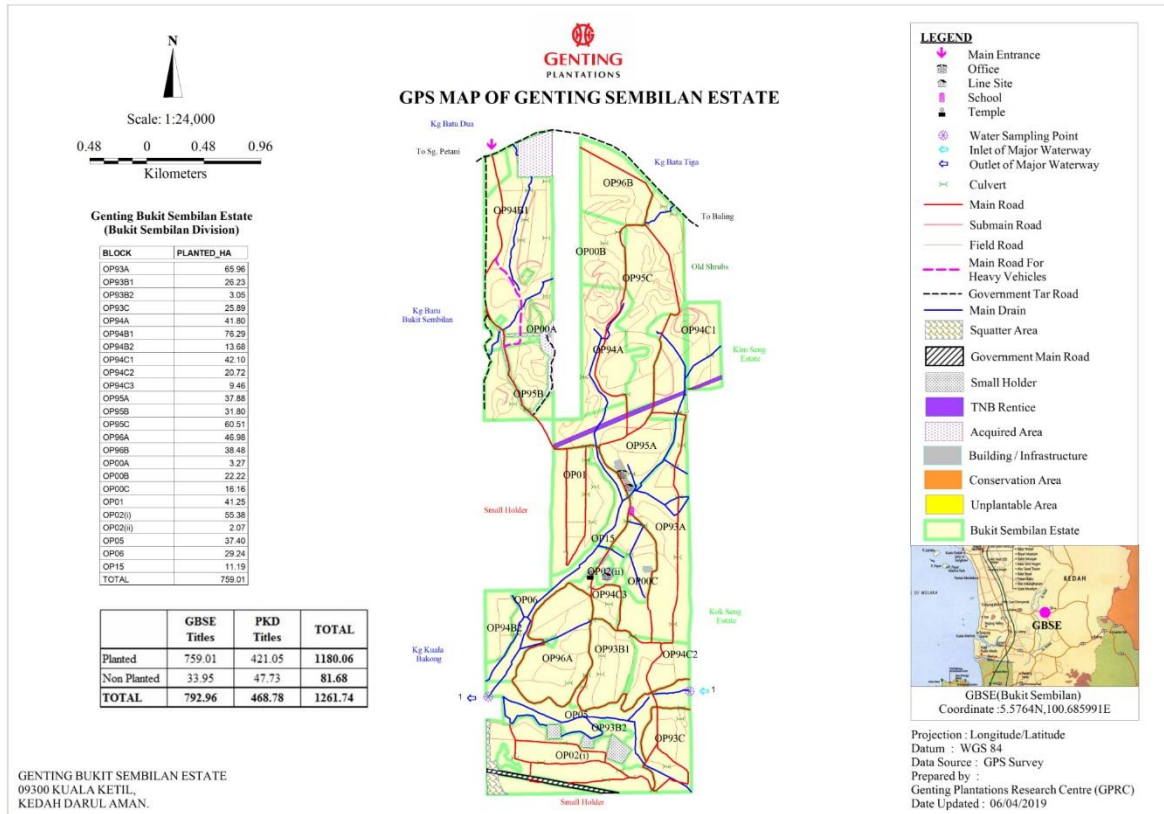
Appendix B: List of Stakeholders Contacted

1. Workers representative
2. Hospital Assistant
3. Sprayer
4. Representative from Kg Kuala Bakong
5. Representative from Kg Keok Seng
6. Manager, Solid Orient (Contractor)
7. Representative from SJKT Ldg Bukit Sembilan
8. Estate Manager, Stothard Estate
9. Contractors

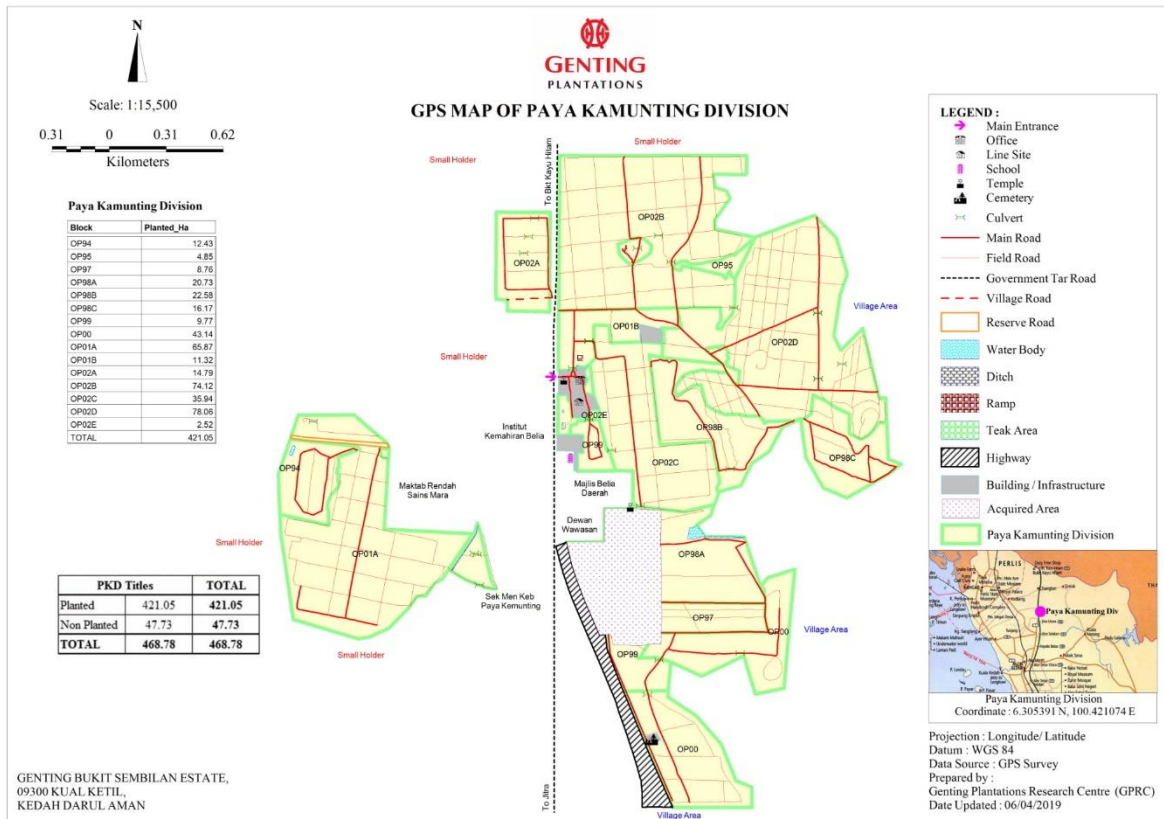
Appendix C: Smallholder Member Details

No	Name of smallholder	Year Planted	Land Area (ha)	Forecast FFB (Mt/ha/year)
1	-Not applicable-			
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
TOTAL				

Appendix F: Location and Field Map (Main Division and Paya Kamunting Division)



MSPO Public Summary Report
Revision 0 (Aug 2017)



Appendix G: List of Abbreviations

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GBSE	Genting Bukit Sembilan Estate
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MSPO	Malaysian Sustainable Palm Oil
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RTE	Rare, Threatened or Endangered species
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure