

**MALAYSIAN SUSTAINABLE PALM OIL
– INITIAL ASSESSMENT
Public Summary Report**

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|---|
| <p>Client company Address: Genting Plantations Berhad 10th Floor, Wisma Genting Jalan Sultan Ismail 50250 Kuala Lumpur Malaysia</p> |
| <p>Certification Unit: Genting Bukit Sembilan Estate</p> <p>Location of Certification Unit: 09300 Kuala Ketil, Kedah, Malaysia</p> |

Report prepared by:
Mohamed Hidir Zainal Abidin (Lead Auditor)

Report Number:
8850212

Assessment Conducted by:
BSI Services Malaysia Sdn Bhd,
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Section 1: Executive Summary

| 1.1 Organizational Information and Contact Person | | | |
|---|---|-----------|--|
| MPOB License | MPOB License: 508758102000 valid from 01 June 2018 to 31 May 2019 (Main Division) MPOB license: 508759002000 valid from 1st June 2018 to 31st May 2019 (Paya Kamunting Division) | | |
| Company Name | Genting Plantations BERhad | | |
| Address | Genting Bukit Sembilan Estate 09300 Kuala Ketil, Kedah, Malaysia | | |
| Group name if applicable: | N/A | | |
| Subsidiary of (if applicable) | N/A | | |
| Contact Person Name | Mr. Tan Cheng Huat (Senior Vice President – Plantation Division) | | |
| Website | http://www.gentingplantations.com | E-mail | chenghuat.tan@genting.com |
| Telephone | +603 2333 6510 (Head office) +607 7631 992 (Estate) | Facsimile | +603 2333 6575 |

| 1.2 Certification Information | | | |
|---|--|-----------------------|-------------|
| Certificate Number | MSPO 682996 | | |
| Issue Date | 28/01/2019 | Expiry date | 27/01/2024 |
| Scope of Certification | Production of certified FFB | | |
| 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 | TBA | | |
| Continuous Assessment Visit Date (CAV) 2 | TBA | | |
| Continuous Assessment Visit Date (CAV) 3 | TBA | | |
| Continuous Assessment Visit Date (CAV) 4 | TBA | | |
| Other Certifications | | | |
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date |
| EU-ISCC-Cert-DE119-60186938 | ISCC EU | ASG Cert GmbH | 05/06/2019 |
| ISCC-Plus-Cert-60186938 | ISCC PLUS | ASG Cert GmbH | 05/06/2019 |
| RSPO 673953 | RSPO P&C MYNI 2014 | BSI | 17/9/2022 |

| 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 | |
| | | Longitude | Latitude |
| Genting Bukit Sembilan Estate (GBSE – Main Division) | 09300 Kuala Ketil, Kedah, Malaysia | 5° 34' 35.04" N | 100° 41' 9.57" E |
| Genting Bukit Sembilan Estate – Paya Kamunting Division (PKD) | 09300 Kuala Ketil, Kedah, Malaysia | 6° 18' 19.41" N | 100° 25' 15.87" E |

| 1.4 Plantings & Cycle | | | | | |
|-------------------------------|------------------|--------|---------|---------|---------|
| Estate | Age (Years) - ha | | | | |
| | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 |
| Genting Bukit Sembilan Estate | 11.19 | 0 | 66.64 | 536.38 | 567.18 |

| 1.5 FFB Production (Actual) and Projected (tonnage) | | | |
|---|---------------------------|---|---|
| Producer Group | Projected from last audit | Actual production July 2017 – June 2018 or last 12 months | Projected production for next 12 months (Jan – Dec' 2018) |
| Genting Bukit Sembilan Estate | N/A | 25,883.44 | 26,420.00 |

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

| 1.7 Certified Area | | | | | |
|-------------------------------|---|-------------|-----------------------------------|--------------------|-----------------|
| Estate | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
| Genting Bukit Sembilan Estate | 1,181.39 | 0.14 | 52.62 | 1,234.15 | 95.72 |

| | | | | | |
|-------|----------|------|-------|----------|-------|
| TOTAL | 1,181.39 | 0.14 | 52.62 | 1,234.15 | 95.72 |
|-------|----------|------|-------|----------|-------|

1.8 Details of Certification Assessment Scope and Certification Recommendation:

BSI Services Malaysia Sdn Bhd has conducted the Initial Assessment of Genting Bukit Sembilan Estate, located in Kuala KETil, Kedah comprising 1 estate and infrastructure

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

The onsite assessment was conducted on 27/07/2018.

Based on the assessment result, Genting Bukit Sembilan Estate complies with the MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Independent Smallholders 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
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BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted on 27/07/2018. The audit programme is included as Appendix A. The approach to the audit was to treat the Genting Bukit Sembilan Estate as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Independent Smallholders 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.

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

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

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

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.

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This report was externally reviewed by MSPO approved Peer Reviewer prior to certification decision by BSI.

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

| 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: August 1, 2019

Total No. of Mandays: 2 mandays

BSI Assessment Team:

Mohamed Hidhir Zainal Abidin – Lead Auditor

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

Nicholas Cheong – Team Member

He holds Master of Environmental Management from the University Putra Malaysia and Bachelor of Science (Food Science) from Charles Sturt University Australia. He has more than 5 years of working experience in sustainability auditing and carbon emissions accounting. He has also 2 years of working experience in wastewater treatment construction and operations. He has completed the ISO9001, ISO14001, RSPO P&C Lead Auditor and RSPO SCC Lead Auditor course and MSPO Awareness Training (by MPOB). In his previous certification body experience, he was the Lead Assessor for Clean Development Mechanism, World Commission of Dam and ISCC. The CDM and WCD assessment focuses on social accountability. He had been involved in Sustainable Palm Oil auditing for more than 2 years. Able to communicate in Bahasa Malaysia and English

Accompanying Persons: Nil

Section 3: Assessment Findings

3.1 Details of audit results

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

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- 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 Initial Assessment there were two (2) Major nonconformities and one (1) opportunity for improvement raised. Genting Bukit Sembilan Estate certification unit has submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for its effectiveness and closed accordingly.

| Major Nonconformities: | | |
|-----------------------------|--|---------|
| Ref | Area/Process | Clause |
| 1664508-201806-M1 | Genting Bukit Sembilan Estate | 4.5.1.1 |
| 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: | <p>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.</p> <p>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.</p> | |
| Corrections: | <p>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.</p> <p>To appoint an authorized person (Asst Manager) to conduct the linesite inspection.</p> <p>To issue memo to the authorized person to conduct the linesite visit weekly.</p> | |
| 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: | To ensure regular monitoring and compliance with the Workers Minimum Standards of Housing and Amenities Act 1990. | |

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| | |
|------------------------|--|
| | To review and revise all the other existing contract agreement to comply with the legal requirements and LRR. |
| 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> |

| Major Nonconformities: | | |
|-------------------------------|---|---------------|
| Ref | Area/Process | Clause |
| | | |
| 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> | |

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| | |
|------------------------|---|
| 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> <p>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.</p> |
|------------------------|---|

| Opportunity For Improvement | | |
|-----------------------------|--|---------|
| Ref | Area/Process | Clause |
| <i>1664508-201806-I1</i> | Genting Bukit Sembilan | 4.5.2.1 |
| Requirements: | Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period | |
| Objective Evidence: | Management plan has been established to improve the efficiency of the fossil fuel usage. However, the management plan dated 25/07/2018 did not considered change of plan or further improvement identification since the diesel usage for the first 6 months of 2018 is 1.52l per ton of FFB. | |

| Noteworthy Positive Comments | |
|------------------------------|---|
| 1 | Good cooperation and commitment from the management and staff |
| 2 | Management, staff and workers were able to demonstrate good understanding on sustainability |
| 3 | - |

3.3 Status of Nonconformities Previously Identified and OFI

Not applicable.

| Major Nonconformities: | | |
|-----------------------------|--------------|--------|
| Ref | Area/Process | Clause |
| <i>NC ID from eReport</i> | N/A | N/A |
| Requirements: | N/A | |
| Statement of Nonconformity: | N/A | |
| Objective Evidence: | N/A | |
| Corrections: | N/A | |

| | |
|------------------------|-----|
| Root cause analysis: | N/A |
| Corrective Actions: | N/A |
| Assessment Conclusion: | N/A |
| Stage II Status: | N/A |
| Assessment Conclusion: | N/A |

3.4 Issues Raised by Stakeholders

| IS # | Description |
|------|--|
| 1 | Issues: Squatter - He informed that the company wanted to take back the land where he is staying for more than 50 years which he felt unsatisfied. Apart from that, he has good relationship with the management. |
| | Management Responses: Verified with the management confirmed that the management did not plan to take back the land, they just want to outline an agreement with the squatter with terms and conditions to be added. |
| | Audit Team Findings: Document verified the meeting minutes where a negotiation meeting was conducted on 13/7/2018 with the squatter. The result of the issue has yet to be finalized where it is awaiting instruction from top management. This will be verified during next assessment. |
| 2 | Issues: Gender Committee Representatives – There was no sexual harassment nor violence case reported so far. They have carried out meeting once every 6 months to discuss if there is any issue. |
| | Management Responses: The management will continue to monitor if there is any issue. |
| | Audit Team Findings: No other issue. |
| 3 | Issues: Workers’ Representatives – They informed that they were treated equally without any discrimination. They are tendering their passport voluntarily and they are allowed to take back the passport whenever they want. Their salary have achieved Minimum Wage Order 2016. |
| | Management Responses: The management will ensure that they will comply with the legal requirement and treats all the workers equally. |
| | Audit Team Findings: No other issue. |
| 4 | Issues: Contractors – The payment was made promptly and they have good relationship with the management. They are aware and understood of the complaint procedure. |
| | Management Responses: The management will ensure the payment will be made accordingly. |
| | Audit Team Findings: No further issue. |

3.5 Summary of the Nonconformities and Status

| CAR Ref. | | CLASS | ISSUED | STATUS |
|------------------------------|---|--------------|---------------|--------------------------|
| 1664508-201806-M1 4.3.1.1 | – | Major | 27/07/2018 | Closed out on 26/9/2018. |
| 1664508-201806-M2 4.4.5.6 | – | Major | 27/07/2018 | Closed 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 - | The Genting Plantations MSPO Policy signed by the President & CEO of Genting Plantations dated 18/03/2014 was signed and implemented. | Complied |
| 4.1.1.2 | The policy shall also emphasize commitment to continual improvement. - Major compliance - | The established policy has emphasized on the commitment to comply with all applicable legal requirements, contribute to local community development, and environmental consideration with the objective of improving the estate operation. | 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 - | Combined RSPO and MSPO internal audit was last carried out on 20-22/6/18 (main division) and 28-29/6/18 (PKD division) by Sustainability Team. Total of 12 major NC raised and verification on the closure was done on 24/7/18. All NC have been closed satisfactorily | 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 | Genting Plantations Berhad has implemented Internal Audits Procedure under the established procedure, to Sustainability Management Procedure, SMP-GPB-03, revision 1 dated 11/12/13 which approved by EVP Plantation, Abd Halim Abd Majid. The | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|--|------------|
| | implement the necessary corrective action. - Major compliance - | procedure is designed for all applicable sustainability standards requirements such as ISCC,RSPO, MSPO and MPOB-Co Gap. The procedure has incorporated the internal auditor competency requirement. Based on the procedure, internal audit is planned once a year. No finding recorded in the last internal audit and only a few comments for improvement recorded in the report. All finding has been followed up and closed by lead auditor. | |
| 4.1.2.3 | Report shall be made available to the management for their review. - Major compliance - | The internal audit report has distributed and reported to the GBSE management. There is a month SQM meeting at HQ level to review the treading of findings raised in both internal and external audit. | Complied |
| Criterion 4.1.3 – Management Review | | | |
| 4.1.3.1 | The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance - | Genting Plantations Berhad is RSPO certified organization. On annual basis management review is conducted on estate level. The last management review was conducted on 12 th July 2018. The management review had included internal and external sustainable palm oil audit results review. The status of the correction and preventive actions are being discussed and reviewed. The meeting was chaired by estate manager. The minutes of the meeting and review presentation dated 12 th July 2018 was sighted. | Complied |

| Criterion / Indicator | Assessment Findings | Compliance | |
|--|---|--|-----------------|
| Criterion 4.1.4 – Continual Improvement | | | |
| 4.1.4.1 | <p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p>- Major compliance -</p> | <p>The latest Continual Improvement Plan for 2018 was adopting the RSPO CIP. The improvement plan includes workers welfare, waste management occupational health and safety and operation improvement. For example, a few improvement projects have been initiated for the field operation and workers welfare such as :</p> <p>i)Water irrigation project - 16 ha of irrigation project (trial) for low yielding field.</p> <p>ii)Septic Tank Replacement - Improve sanitation at line site (Paya Kamunting Division)</p> | <p>Complied</p> |
| 4.1.4.2 | <p>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.</p> <p>- Major compliance -</p> | <p>Mechanization for field operation has been introduced at GBSE. For example:</p> <p>i) FFB evacuation – MaiC (mechanical assisted infield collection), MPC (Mechanical Platform Collection)</p> <p>ii) Mono sprayer – 1: 500 ha area coverage</p> <p>iii) Fertilizer spreader – 1: 500 ha area coverage</p> | <p>Complied</p> |
| 4.1.4.3 | <p>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.</p> <p>- Major compliance -</p> | <p>Training for those involved in mechanization was sighted. For example the latest training given by Sime Kubota on 13/4/18 on the safe operation and maintenance of tractor.</p> | <p>Complied</p> |

| Criterion / Indicator | Assessment Findings | 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>Genting Plantations Berhad has issued a list of documents that could be access by the stakeholders to all the stakeholders during stakeholder meeting or by posted to the stakeholders. The documents that could be access are such as all the policies, SEIA report and the management plan, complaint & grievances procedure. Interviewed with the stakeholders such as contractor, local communities and internal workers confirmed that they are aware of it and understood that they have the rights to participate in the decision making.</p> | <p>Complied</p> |
| 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>Genting Plantations Berhad has developed Procedures on Request and Responses, Doc. No. SMP-GPB-25 dated 14/8/2014 revision 0. The procedure has defined the process to respond to the information requested by stakeholders and the responsibilities and actions by management for the process. The stakeholders can request during meeting, via phone, email or write in, walk in. All the requests will be recorded in the Enquiry Register Book. The time frame to acknowledge and respond to the request is within 7 working days upon receiving the request from stakeholders. Verified the Enquiry Register Book found that request letters from the stakeholders were pasted in the book. For eg: A stakeholder has requested the management to borrow the tractor to pull his lorry that stuck inside the plantation on 22/6/2018. The manager has approved.</p> <p>Genting Plantations Berhad is open to all the stakeholders to request information such as policies, SEIA reports and management plans,</p> | <p>Complied</p> |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|--|------------|
| | | audit reports, pollution reduction plans, complaint & grievances procedure, FPIC procedure. The stakeholders will have required to fill in the Enquiry Register Book in order to access to the documents. Sustainability Report and Annual Report will be publicly available in the website: www.gentingplantations.com . | |
| 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 - | Genting Plantations Berhad has issued a list of documents that could be access by the stakeholders to all the stakeholders during stakeholder meeting or by posted to the stakeholders. The documents that could be access are such as all the policies, SEIA report and the management plan, complaint & grievances procedure. Interviewed with the stakeholders such as contractor, local communities and internal workers confirmed that they are aware of it and understood that they have the rights to participate in the decision making. | 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 - | Genting Plantations Berhad has developed Procedures on Request and Responses, Doc. No. SMP-GPB-25 dated 14/8/2014 revision 0. The procedure has defined the process to respond to the information requested by stakeholders and the responsibilities and actions by management for the process. The stakeholders can request during meeting, via phone, email or write in, walk in. All the requests will be recorded in the Enquiry Register Book. The time frame to acknowledge and respond to the request is within 7 working days upon receiving the request from stakeholders. Verified the Enquiry Register Book found that request letters from the stakeholders were pasted in the book. For eg: A stakeholder has requested the management to borrow the tractor to pull his lorry that stuck inside the plantation on 22/6/2018. The manager has approved. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---------------------------------------|--|--|------------|
| | | Genting Plantations Berhad is open to all the stakeholders to request information such as policies, SEIA reports and management plans, audit reports, pollution reduction plans, complaint & grievances procedure, FPIC procedure. The stakeholders will have required to fill in the Enquiry Register Book in order to access to the documents. Sustainability Report and Annual Report will be publicly available in the website: www.gentingplantations.com. | |
| 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 - | Genting Plantations Berhad has issued a list of documents that could be access by the stakeholders to all the stakeholders during stakeholder meeting or by posted to the stakeholders. The documents that could be access are such as all the policies, SEIA report and the management plan, complaint & grievances procedure. Interviewed with the stakeholders such as contractor, local communities and internal workers confirmed that they are aware of it and understood that they have the rights to participate in the decision making. | 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 - | The estate have implemented the Sustainability Management Procedure Manual for Traceability (SMP-GPB-09; Revision 03) dated 18/1/18 to ensure the handling of outgoing FFB are carried out in the proper manner and to ensure traceability and to meet the sustainability requirements. Relevant records such as the dispatch note, FFB dispatch advice, weighbridge tickets and bunch count chit were available. | Complied |

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| 4.2.3.2 | The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance - | The harvesting field supervisor holds the responsibility on regular inspection, whereby the effectiveness of monitoring seen captured in the internal audit by the Sustainability Dept. There is also a field routine visit by the Assistant Manager and an annually visit by the Sustainability Dept. | Complied |
| 4.2.3.3 | The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance - | The management has appointed the Assistant Manager as the "Management Representative for ISCC, RSPO and MSPO Related Matters". Clause 1 of his appointment letter mentioned on his role that was cross verified against the Sustainability Management Procedure Manual for Traceability (SMP-GPB-09; Revision 02) dated 14/08/2014. Refer to appointment letter dated 7/6/18. | Complied |
| 4.2.3.4 | Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance - | Interviewed weighbridge operator to understand the traceability of incoming FFB from estate and delivery of FFB to 3 rd party mill. Sighted the following records:- 1. Bunch Count Chit (BCC) – Sample checked: field 2002- 287 bunches, 94C3-106 bunches and 93B1 – 274 bunches 2. Weighbridge ticket@ dispatch note, FFB 18001059W dated 26/7/18, total weight: 14.07 mt 3. Daily FFB Despatched Records dated 26/7/18 4. Daily FFB Muster sheet dated 26/7/18 | Complied |
| 4.3 Principle 3: Compliance to legal requirements | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| 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 - | List of applicable legal documented under LRR @ legal requirement register, SMP-GPB-22. The list of legal requirements is available by the sustainability team for reference when it is required. Non-compliance to legal requirements 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 line site 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. | Major Non-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 documented under LRR @ legal requirement register, SMP-GPB-22. The Procedure on regional, national and international Laws (doc: SMP-GPB-21) described the mechanism of tracking the changes of laws is contained in the legal requirements register. | 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 - | The Procedure on regional, national and international Laws (doc: SMP-GPB-21) described the mechanism of tracking the changes of laws is contained in the legal requirements register. The internal audit checklist was reviewed and it contained the criteria to audit the legal compliance that is applicable to the company. | Complied |
| 4.3.1.4 | The management should assign a person responsible to monitor | The Procedure on regional, national and international Laws (doc: SMP-GPB-21) described the mechanism of tracking the changes of | Complied |

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| | compliance and to track and update the changes in regulatory requirements. - Minor compliance - | laws is contained in the legal requirements register. Currently, the person/team responsible for monitoring the changes and communicating is Estate Manager and Genting Sustainability team. | |
| Criterion 4.3.2 – Lands use rights | | | |
| 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 - | There is no land dispute in the Genting Bukit Sembilan Estate at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations (WM) Sdn Bhd and land ownership documents verified. | 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 - | The land grant for Paya Kamunting was verified. The lands are registered under Asiatic Plantation (WM) Sdn Bhd. Asiatic is a subsidiary of Genting Plantations. Sample of land grant verified: <ol style="list-style-type: none"> 1. GRN 197658 15.34ha (for rubber plantation) 2. GRN 197660 76.97ha (for rubber plantation) 3. GRN 199826 379.3ha (for rubber plantation) The grants are attached with proper demarcated maps issued by the state authorities. | Complied |
| 4.3.2.3 | Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance - | The land boundaries are observed onsite and it was confirmed from the surrounding smallholders that there were not land conflicts. | Complied |
| 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 | There is no land dispute in the Genting Bukit Sembilan Estate at the time of audit verified through interviewed with the smallholders and local | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance - | communities. The land belongs to Genting Plantations (WM) Sdn Bhd and land ownership documents verified. | |
| 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 - | There is no land dispute in the Genting Bukit Sembilan Estate at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations (WM) Sdn Bhd and land ownership documents verified. | Complied |
| 4.3.3.2 | Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance - | There is no land dispute in the Genting Bukit Sembilan Estate at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations (WM) Sdn Bhd and land ownership documents verified. | Complied |
| 4.3.3.3 | Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance - | There is no land dispute in the Genting Bukit Sembilan Estate at the time of audit verified through interviewed with the smallholders and local communities. The land belongs to Genting Plantations (WM) Sdn Bhd and land ownership documents verified. | 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. - Minor compliance - | Social Impact Assessment & Human Rights Impact Assessment (HRIM) was conducted on 2-12/5/2017 by Sustainability Department with status updated on 11/7/2017. The methodology of the assessment was through stakeholder consultation with the contractors, local communities, government authorities, | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | schools' representatives and smallholders. The areas that covered during the assessment were such as safety & health, environment, security, workforce, channel of communication, pay and condition and basic rights. | |
| 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 - | Genting Plantations Berhad has implemented Complaints and Grievances Procedure with Doc. No. SMP-GPB-19 dated 21/3/2018 revision 03. The procedure has clearly outlined the process of dealing the complaints and grievances. The complaints and grievances can be made through post, email or via the Complaint and Suggestion Box located in the office. | 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 - | The time frame to acknowledge and respond to the complaints and grievances is within 1 month upon receipt. | Complied |
| 4.4.2.3 | A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance - | Genting Plantations Berhad has implemented Complaints and Grievances Procedure with Doc. No. SMP-GPB-19 dated 21/3/2018 revision 03. The procedure has clearly outlined the process of dealing the complaints and grievances. The complaints and grievances can be made through post, email or via the Complaint and Suggestion Box located in the office. | Complied |
| 4.4.2.4 | Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance - | Interviewed the local community at Paya Kamunting confirmed that they are made to know that in case of any suggestions or complaint it will be directed to the Estate Manager. For employee, it was informed to the assessment team that there are suggestion box provided by the company or they can complaint directly to their estate manager or assistant manager or mandor. | Complied |
| 4.4.2.5 | Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon | The record book of complaints was reviewed. There were no complaints recorded from the community regarding the operations of Genting Bukit | Complied |

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| | request. - Major compliance - | Sembilan Estate. The complaints received from internal parties are just mainly for housing repair. | |
| Criterion 4.4.3: Commitment to contribute to local sustainable development | | | |
| 4.4.3.1 | Growers should contribute to local development in consultation with the local communities. - Minor compliance - | Genting Bukit Sembilan Estate has made contributions to the communities such as organized football tournament within the estates, celebration together with the workers during festive season such as Hari Raya. Donation to the temple festival was carried out and seen the cash voucher receipt of donation. Besides, the estate has donated to the school's sport day and helped to clean up the school surrounding. The estate also offered job opportunities to the local communities. | Complied |
| Criterion 4.4.4: Employees safety and health | | | |
| 4.4.4.1 | An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance - | The Occupational Safety And Health Policy was established, signed by President and Chief Operating Officer on 1 July 2015. | Complied |
| 4.4.4.2 | The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: | a) OHS management plan for 2018 has been established. The OHS plan comprises of OSH objectives, OSH policy, training, accident & incident statistic, OSH meetings, HIRARC, emergency response plan (ERP), First aid kit, audit inspection and etc. <u>Workplace Inspection (quarterly)</u> Latest inspection was carried out on 11/5/18 by safety committee for chemical store, tractor and heavy vehicle, harvesting and fertilizer | Complied |

| Criterion / Indicator | Assessment Findings | Compliance |
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| <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. | <p>store. Workplace inspection need to be done prior to safety meeting as the inputs will be discussed in the meeting.</p> <p><u>First Aid Kit and Fire Extinguisher (FE) Inspection (monthly)</u></p> <p>There are total of 20 FE available at GBSE; 4 units of CO2 and 16 units are dry powder. FE are located at each pertinent location within estate's work units and under serviceable condition. The last inspection was carried out in the month of June 2018. Monthly check was carried out for harvesting gang (23/7/18), tractor drivers (2/7/18) and spraying gang (18/7/18) by Estate Hospital Assistant (EHA). No record of expired item reported in the checklist and the required item has been replenished</p> <p>b) GBSE had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. Latest HIRARC review was carried out on 16/7/18 with regards to Mono Spray/CDS/CKS/AP30/Mist Blower activity. Other activities such as chemical mixing and harvesting (tall/low/prime/terrace/swampy area) was also reviewed.</p> <p><u>Chemical Health Risk Assessment (CHRA)</u></p> <p>CHRA was conducted on 15/3 to 30/4/17 (GBSE) by QMSPRO Training & Consultancy (JKKP HIE 127/171-2(154). 3 work units were</p> | |

| 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>assessed and related recommendation report under from F of the report. Example of recommendation as per below:</p> <table border="1" data-bbox="1050 523 1856 951"> <thead> <tr> <th>Work unit</th> <th>Recommendation</th> </tr> </thead> <tbody> <tr> <td>Fertilizer Application Personnel</td> <td>Chemical safe handling every 2 years</td> </tr> <tr> <td>Pesticides Application Personnel</td> <td>Chemical safe handling every 2 years Biological monitoring/medical surveillance programme</td> </tr> <tr> <td>Workshop Personnel</td> <td>Chemical safe handling every 2 years</td> </tr> </tbody> </table> <p>c, d &e) Awareness and training programme had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. Suitable PPE has been provided to the workers based on the information in the MSDS/CSDS and CHRA assessor's recommendation.</p> <p>List of Personal Protective Equipment (PPE) Provided – identifies the type of PPE for the respective activities.</p> | Work unit | Recommendation | Fertilizer Application Personnel | Chemical safe handling every 2 years | Pesticides Application Personnel | Chemical safe handling every 2 years Biological monitoring/medical surveillance programme | Workshop Personnel | Chemical safe handling every 2 years | |
| Work unit | Recommendation | | | | | | | | | |
| Fertilizer Application Personnel | Chemical safe handling every 2 years | | | | | | | | | |
| Pesticides Application Personnel | Chemical safe handling every 2 years Biological monitoring/medical surveillance programme | | | | | | | | | |
| Workshop Personnel | Chemical safe handling every 2 years | | | | | | | | | |

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| | <p>Field workers (sprayer, manurer & harvester) – organic vapour cartridge respirator, anti-mist goggles, wellington, boots, apron and sickle cover.</p> <p>f & g) OSH Committees meeting conducted quarterly and meeting minutes includes issues raised and action taken form workplace inspection report etc. Estate assistant manager appointed at secretary of SHC and the chairman is the Estate Manager. Verified appointment letter dated 5/2/18 and valid for 2 years. The latest meeting was carried out on 11/6/18 and attended by the SHC committee from both management and workers representative.</p> <p>The discussion on the accident review, workplace inspection, safety improvement plan, issues from workers, training, complaints has been discussed and action to be taken. There was no major issue raised.</p> <p>h) Accident and emergency procedures have been communicated to employees, contractors and visitors. Fire evacuation drill was last conducted on 6/7/18 (GBSE) to test the state of readiness during emergency situation. Workers trained in First Aid were present in the field operations. Sample of certificate of proficiency, (CoP) for harvesting and spraying mandore as per below:</p> <p>i) Certificate no. FA2231/18/29497 – Basic Occupational First Aid, CPR and AED Training, valid until 19/3/21</p> <p>ii) Certificate no. FA2233/18/29499 – Basic Occupational First Aid, CPR and AED Training, valid until 19/3/21</p> | |

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| | | <p>Record of accident submitted to DOSH via online portal http://mykkp.dosh.gov.my. Reference number: JKPP 8/9117/2018 dated 12/1/18. Summary of accident reported based on Lost Time Accident (LTA) metrics was maintained and based on accident statistic monitoring, JKPP 6, 7 & 8. Sample of accident statistic as shown below:</p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>Year</th> <th>GBSE</th> </tr> </thead> <tbody> <tr> <td>2017</td> <td>2 cases (18 LTA)</td> </tr> <tr> <td>2018 (to date June 18)</td> <td>3 cases (18 LTA)</td> </tr> </tbody> </table> <p>*LTA is equivalent to lost man days.</p> | Year | GBSE | 2017 | 2 cases (18 LTA) | 2018 (to date June 18) | 3 cases (18 LTA) | |
| Year | GBSE | | | | | | | | |
| 2017 | 2 cases (18 LTA) | | | | | | | | |
| 2018 (to date June 18) | 3 cases (18 LTA) | | | | | | | | |
| 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> | <p>Genting Plantations Berhad has developed Social Policy dated 22/6/2015 where the company respect and support the Universal Declaration of Human Rights. The policy was displayed at the notice board in the office area. Briefing of the policy was conducted on 9/3/2018 and during induction training for the new workers. Seen the training records such as training attendance list and training materials. Interviewed with the workers confirmed that they were respected by the company.</p> | Complied | | | | | | |
| 4.4.5.2 | <p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment</p> | <p>Genting Plantations Berhad has established People Policy dated 3/8/2009 signed by Chief Operating Officer where the company</p> | Complied | | | | | | |

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| | <p>regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p> | <p>prohibit any form of violence, harassment or discrimination against race, religion, national origin, disability, pregnancy, age and gender. The policy was displayed at the notice board in the office area. Briefing of the policy was conducted on 9/3/2018 and during induction training for the new workers. Seen the training records such as training attendance list and training materials.</p> <p>The estate has recruited local and foreign workers with the composition of female and male workers. They were treated equally without any discrimination. They were paid according to legal requirements. Interviewed with the female and male workers confirmed that they were allowed to transfer to other work stations if they found they are unfit for the job.</p> | |
| 4.4.5.3 | <p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p> | <p>The estate has employed local workers, foreign workers and contract workers. The management has included basic pay, net pay, gross pay, deduction of salary, holiday pay on the pay slip. Sampled of payslip for December 2017, February 2018 and June 2018 as below:</p> <ul style="list-style-type: none"> i. Employee No.: 01089 ii. Employee No.: 02458 iii. Employee No.: 26701 iv. Employee No.: 02425 v. Employee No.: 02528 <p>All the sampled workers were achieved Minimum Wage Order 2016.</p> | Complied |
| 4.4.5.4 | <p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> | <p>Employment contract are available and explained in language that understood by workers. The contract was signed by the workers and sampled contracts as below:</p> <ul style="list-style-type: none"> a. Employee No.: 02432 b. Employee No.: 02425 | Complied |

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| | - Minor compliance - | <ul style="list-style-type: none"> c. Employee No.: 02528 d. Employee No.: 02546 e. Employee No.: 26701 | |
| 4.4.5.5 | <p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p> | <p>The estate has keep the workers' masterlist which provide the workers' name, gender, date of birth, job description and identity reference. Workers' records are also available in the LintraMax system such as name, registration no., salary, date of birth, date joined, position</p> <p>The wage of the workers are depending on the task.</p> | Complied |
| 4.4.5.6 | <p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p> | <p>Employment contract are available and explained in language that understood by workers. The contract was signed by the workers and sampled contracts as below:</p> <ul style="list-style-type: none"> a. Employee No.: 02432 b. Employee No.: 02425 c. Employee No.: 02528 d. Employee No.: 02546 e. Employee No.: 26701 <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 | Major Non-Compliance |

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| | | Besides, the watchman (Employee No.: 02548) that recruited on March 2018 has yet to sign on the employment contract. Thus a major NC was raised. | |
| 4.4.5.7 | The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. - Major compliance - | Hours worker including overtime that carried out by workers are recorded in the Checkroll Book. All the overtime was paid according to the Checkroll Book and total overtime was shown in the payslip. | Complied |
| 4.4.5.8 | 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. - Major compliance - | Interview with workers and document reviewed on the check roll logbook as well as payslip shown that the overtime payments are in accordance to law and workers are not forced to work overtimes. | Complied |
| 4.4.5.9 | Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance - | Sampled of payslip for December 2017, February 2018 and June 2018 as below: <ul style="list-style-type: none"> i. Employee No.: 01089 ii. Employee No.: 02458 iii. Employee No.: 26701 iv. Employee No.: 02425 v. Employee No.: 02528 | Complied |
| 4.4.5.10 | 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. | Free medical assistance, water and electricity supply was provided to workers. Interviewed with the workers found that they were satisfied with the housing condition. | Complied |

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| | - Minor compliance - | | |
| 4.4.5.11 | 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. - Major compliance - | Linesite inspection was conducted on weekly basis by HA and the last inspection was carried out on 4/7/2018, 12/7/2018, 19/7/2018 and 23/7/2018. | Complied |
| 4.4.5.12 | The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance - | Genting Plantations Berhad has implemented Sexual Harassment Policy dated 3/8/2009 signed by Chief Operating Officer. The company is committed to strive for harassment-free environment. The policy was displayed at the notice board in the office area. Briefing of the policy was conducted on 9/3/2018 and during induction training for the new workers. Seen the training records such as training attendance list and training materials. | Complied |
| 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. - Major compliance - | The company has developed People Policy dated 3/8/2009 where the company is allowed the workers on freedom of association. The policy was displayed at the notice board in the office area. Briefing of the policy was conducted on 9/3/2018 and during induction training for the new workers. Seen the training records such as training attendance list and training materials. Workers Committee was established in Genting Bukit Sembilan Estate and it formed by representatives from different countries and different work station such as Indonesian, Pakistan, Bangladeshi, local, general workers, harvesting group and sprayers. The meeting was conducted on 11/6/2018 with total 14 participants from management and workers. Seen the meeting minutes and subjects such as housing, pay | Complied |

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| | | and at working place were discussed in the meeting. No issue was raised by the workers. Verified through interviewed with the workers' representatives confirmed that no issue regarding their working place, housing and salary has been reported. | | | | | | | | | | | | | |
| 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. - Major compliance - | Genting Plantations Berhad has developed People Policy dated 3/8/2009 where the company does not employ illegal workers nor exploit under aged children to work in the operating units. Document reviewed of the master list of employees and interviewed with the workers confirmed that no child labour was employed. All the workers are above 18 years old. | Complied | | | | | | | | | | | | |
| Criterion 4.4.6: Training and competency | | | | | | | | | | | | | | | |
| 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. - Major compliance - | <p>Training Programme for 2018 was established which covers all aspects of the RSPO Principles and Criteria. Sample of training carried out in 2018:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Trainer</th> </tr> </thead> <tbody> <tr> <td>9/3/18</td> <td>Field Operation Training (Spraying Manuring, Pre-mixing)</td> <td>Estate Assistant</td> </tr> <tr> <td>19-20/3/18</td> <td>First Aid Training</td> <td>Cert Academy Sdn Bhd</td> </tr> <tr> <td>5/2/18</td> <td>PPE and Safety Training</td> <td>Estate Assistant</td> </tr> </tbody> </table> | Date | Training | Trainer | 9/3/18 | Field Operation Training (Spraying Manuring, Pre-mixing) | Estate Assistant | 19-20/3/18 | First Aid Training | Cert Academy Sdn Bhd | 5/2/18 | PPE and Safety Training | Estate Assistant | Complied |
| Date | Training | Trainer | | | | | | | | | | | | | |
| 9/3/18 | Field Operation Training (Spraying Manuring, Pre-mixing) | Estate Assistant | | | | | | | | | | | | | |
| 19-20/3/18 | First Aid Training | Cert Academy Sdn Bhd | | | | | | | | | | | | | |
| 5/2/18 | PPE and Safety Training | Estate Assistant | | | | | | | | | | | | | |

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|---|--|---|---|---------------------|------------|
| | | 6/3/18 | Tractor Driver Competency Training | Sime Kubota Sdn Bhd | |
| | | 8/7/18 | Fire Demonstration and Fire Fighting Training | Estate Assistant | |
| 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>Training needs of individual employees had been 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> | | | Complied |
| 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>It was evident that from the training matrix for 2017/2018 and training records for 2017/2018 that all trainings had been planned and implemented to ensure that all employees are well trained in their job function and responsibility</p> | | | 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>Environmental Policy was established, signed by President and Chief Operating Officer on 5th October 2009. The policy was communicated during Policy briefing.</p> | | | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| 4.5.1.2 | <p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. <p>- Major compliance -</p> | <p>There are 2 management plans developed. 1) Environment Improvement & Management Plan is in place and as per the last review on 25/07/2018, 2) Management plan incorporated in the EAI for the specific activities. Base on both the reviews there are no significant changes required. The management plans included the responsible person and timeline was identified.</p> | Complied |
| 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>The monitoring protocol are incorporated in both the management plans which is reviewed once a year. Sample of the monitoring:</p> <ul style="list-style-type: none"> 1. Training records for Harvesting operation on how to stack fronds to prevent fertilizer runoff on 01/06/2017. 2. Landfill selection are based on identification my assistant manager and estate manager. Based on interview, the selection process of the site is consistent with the Landfill and Domestic Waste Management procedure dated 01/12/2014 | 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>The impact assessment has identified the positive and negative impacts. Samples of activities verified:</p> <ul style="list-style-type: none"> 1. Pesticide Spraying has identified the possible contamination to land and water course. The mitigation plan is to manage no chemical application at riparian zone. Signage and marking has been implemented. 2. Replanting activities has identified possible erosion. The mitigation plan is to plant cover crop as soon as the old palm are fell. | 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 training program for 2018 includes training for all categories of workers and contractors.</p> <p>Interviewed conducted with workers confirmed that they are aware about environmental protection needs at this operation.</p> | Complied |

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|--|--|---|------------|
| 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>Quarterly meeting has been conducted at the estate to discuss the environmental quality and compliance. The records are retained in the estate.</p> | Complied |
| 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>The fossil fuel consumption used are mainly for vehicle to cover the operations. Monthly and annual monitoring of the fossil fuel consumed are available. The diesel consumed for year 2017 is 1.06l per ton of FFB while year to date in 2018 is 1.52l per ton of FFB. However, the management plan dated 25/07/2018 did not considered change of plan or further improvement identification since the diesel usage for the first 6 months of 2018 is 1.52l per ton of FFB. Refer to OFI for further details.</p> | Complied |
| 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>The fossil fuel consumption used are mainly for vehicle to cover the operations. Monthly and annual monitoring of the fossil fuel consumed are available. The diesel consumed for year 2017 is 1.06l per ton of FFB while year to date in 2018 is 1.52l per ton of FFB. The usage of the fossil fuel is insignificant.</p> | Complied |
| 4.5.2.3 | <p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p> | <p>There is no possibility of renewable energy at this estate.</p> | Complied |
| Criterion 4.5.3: Waste management and disposal | | | |

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|-----------------------|--|---|------------|
| 4.5.3.1 | All waste products and sources of pollution shall be identified and documented. - Major compliance - | The waste produced from the operations are identified and documented in the Identification, Segregation and Storage of Waste table dated 21/06/2017. The type of waste has been identified and the actions to handle the wastes are included in table. | |
| 4.5.3.2 | A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products - Major compliance - | The waste management and disposal plan is established dated 23/03/2018. The management plan includes recycling of office papers, disposal of scheduled waste through licensed scheduled waste collector. During the field assessment, recycling program at office is being observed. The last disposal of SW410 and SW305 was on 14/03/2018 by Kumaran & Company Sdn Bhd. Consignment number 2018031512QS12CF and 20180315116N78RS respectively. | Complied |
| 4.5.3.3 | 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. - Major compliance - | The chemical and their containers (e.g. lubricants, chemical containers) are disposed through scheduled waste. The first generated information is available storage area at Paya Kamunting Division. As it is Scheduled waste, the total waste generated on Paya Kamunting is reported in eSwis. The last report was on 30/06/2018. There is so far no consignment not for the scheduled waste collection except the pesticide chemical containers. | Complied |
| 4.5.3.4 | 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 | The pesticide containers are collected by G-Planter. Up to date there is no collections recorded at Paya Kamunting. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance | | | |
|---|---|--|------------|-------------|----------------|----------|
| | national programme on recycling of used HDPE pesticide containers. - Major compliance - | | | | | |
| 4.5.3.5 | Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance - | Domestic waste was disposed as per SOP (Landfill and domestic waste management). The landfill site was observed to have implemented appropriately not located near to watercourse or at high water table areas. | Complied | | | |
| Criterion 4.5.4: Reduction of pollution and emission | | | | | | |
| 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 - | The polluting activities are and type of pollutants and GHG emission has been identified in the Significant Pollutants and GHG Emission – Reduction / Minimization Plan dated 24/07/2018. | Complied | | | |
| 4.5.4.2 | An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance - | The main source of GHG from this operation is CO2 from fossil fuel combustion and NO2 from fertilizer applications. The reduction plan for minimizing NO2 emission is to replace straight fertilizers with compound fertilizers; reduction on tractor usage by implementing cluster harvesting and systematic evacuation. The structure cluster harvesting was verified. The management plan was last reviewed on 24/07/2018. | 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: | Water management plan dated 23/3/18 was made available for verification. The plan has included: <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"></td> <td style="width: 25%;">Action Plan</td> <td style="width: 25%;">Status/remarks</td> </tr> </table> | | Action Plan | Status/remarks | Complied |
| | Action Plan | Status/remarks | | | | |

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|---|---|---|-------------------------|------------|
| a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). 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. e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. - Major compliance - | Source of water | Government treated water | Installation completed | |
| | | Water collection pond – irrigation project at P00C (16ha) | Completed in July 2018. | |
| | Efficiency use of water | - Residential area (pipe leakages) - Optimize usage and reduce wastage - Education and training | Daily basis | |
| | Renewability of water source | Rain water harvesting | On-going | |
| | Avoidance of surface and ground water contamination | Septic tank repairs | On-going | |
| | | Collection of rubbish at line site - 3 times per week - location of landfill (>100m from waterways and line site) | Daily basis | |
| | | Drainage system maintenance and repair | On-going | |
| | | Chemical mix bay sump/recycling | On-going | |
| | Water quality – 6 monthly water | On-going | | |

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|-----------------------|-------------|--|---|------------|-------------|-------------|-------------|-----------|-----------------|-----------|-----------------|-----------|----------------|-----------|------------|----------|
| | | | analysis (OP 05/94C1 and OP 05/96A) Follow INWQS and Std B | | | | | | | | | | | | | |
| | | | Protecting of water course and land – maintaining riparian buffer along waterways | On-going | | | | | | | | | | | | |
| | | Other (flood/water logging area) | Monitoring of rain fall | On-going | | | | | | | | | | | | |
| | | Monitoring of water usage – as at May 2018, total of 23,483 m3 of water consumed for domestic (office and line site) | | | | | | | | | | | | | | |
| | | Documented under GPB’s Sustainability Management Procedure Manual, SMP-GPB-14, rev:1 dated 1/8/14, riparian buffer zones established in lined with DID Guidelines for Rivers and River Reserves Peninsular Malaysia (2001) as per the following: | | | | | | | | | | | | | | |
| | | <table border="1"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> | | | River width | Buffer zone | > 40 meters | 50 meters | 20 to 40 meters | 40 meters | 10 to 20 meters | 20 meters | 5 to 10 meters | 10 meters | < 5 meters | 5 meters |
| River width | Buffer zone | | | | | | | | | | | | | | | |
| > 40 meters | 50 meters | | | | | | | | | | | | | | | |
| 20 to 40 meters | 40 meters | | | | | | | | | | | | | | | |
| 10 to 20 meters | 20 meters | | | | | | | | | | | | | | | |
| 5 to 10 meters | 10 meters | | | | | | | | | | | | | | | |
| < 5 meters | 5 meters | | | | | | | | | | | | | | | |
| | | Training : riparian zone training (16/1/18), HCV training (27/6/18), | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|------------|
| | | Water Sampling analysis (inlet and outlet) was conducted on 17/03/2018 which was analysed by Union Laboratories Sdn Bhd. 7 parameters tested (DO, BOD5, COD, AN, SS, pH and Phosphate) Based on Certificate of Analysis (CoA)ref: 03J01111, the result shown all the parameters were within the limits (based on WQI-DOE). | |
| 4.5.5.2 | No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance - | No construction of bunds, weirs and dams across main rivers or waterways passing through an estate observed during site visit, | Complied |
| 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). - Minor compliance - | It was noted that water harvesting practice has been implemented for road site drain. This is mainly to divert water and minimize soil erosion and maintaining the road condition. | Complied |
| Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value | | | |
| 4.5.6.1 | 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: 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 (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat | The HCV assessment for Northern Region (including Genting Bukit Sembilan estate) was conducted by Dr Yap Son Kheong in March 2010. The HCV assessment has included the inventory of the flora and fauna that is present in the Genting Bukit Sembilan Estate (including outline division Paya Kamunting). | Complied |

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| | <p>requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</p> <p>- Major compliance -</p> | | |
| 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> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p>- Major compliance -</p> | <p>HCV monitoring checklist has been established to monitor the status of the HCV and RTE according to the recommendation of the HCV assessment report. The monitoring includes present of the wildlife, encroachment, protection of flora and ensure all signage are in good conditions.</p> | Complied |
| 4.5.6.3 | <p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p> | <p>The last monitoring was conducted on 26/06/2018 for Bukit Sembilan main division. The outcome of the monitoring was reviewed with the Estate Managers.</p> <p>The monitoring results is reflective to the management plan.</p> | Complied |
| Criterion 4.5.7: Zero burning practices | | | |
| 4.5.7.1 | <p>Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.</p> <p>- Major compliance -</p> | <p>No burning policy is available and signed by (President & Chief Operating Officer) dated 10 Aug 2011 and no evidence of open burning was observed during field assessment there is no opening burning recorded for land preparation.</p> | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|---|------------|
| 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 there is a significant risk of disease spread or continuation into the next crop. - Major compliance - | There is no opening burning recorded for land preparation. | Complied |
| 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 - | There is no controlled burning had taken place. | 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. Only mechanical machine will be used for felling and land preparation. | 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 - | Sustainability Management Procedure Manual, Standard Operating Procedures (SOP) and The Oil Palm Manual (latest update on 30/8/13) were established for the estate operation. The manual covering the activity for replanting, oil palm nursery practices, planting techniques, soil conservation and terracing, pest and diseases, weed management, manuring of oil palm, immaturity, harvesting, crop forecasting and managing any problematic soils. All of the activities have been described comprehensively in the Standard operating | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|--|------------|
| | | <p>procedure (SOP) and pictorial SOP. All the estate implemented through its daily operations.</p> <p>The procedure for Occupational Health and Safety has been established and implemented. Sighted the procedure for Accident investigation, PTW, PPE, workshop, harvesting, manuring, pest & disease were available during the assessment.</p> <p>The procedure for mechanization was established and available at estate office. Sighted the procedure, namely Group Plantation Advisory dated 16/4/2013:</p> <ol style="list-style-type: none"> 1. Structured Cluster Harvesting : MECH-01 2. Mechanically Assisted Collection (MAC): MECH-02 3. Buffalo Assisted Collection (BAC):MECH-03A 4. Buffalo Training: MECH-03B 5. Buffalo Selection and Haulage: MECH-03C | |
| 4.6.1.2 | <p>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.</p> <p>- Major compliance -</p> | <p>The estate will refer to the following procedures for guidance for oil palm grown on sloping land.</p> <ol style="list-style-type: none"> a) OPM 4 : Soil conservation and terracing (rev 2013) b) Steep land Management SMP –GPB-10 | Complied |

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| | | Soil conservation measures has been implemented to prevent both soil erosion as well as siltation of drains and waterways. Construction of silt pit was observed | |
| 4.6.1.3 | A visual identification or reference system shall be established for each field. - Major compliance - | The estate also has a file known as File 56: Estate Maps & Satellite Images where the following are identified for reference : a) Soil Map b) Slope class map c) Blocking map d) Riparian buffer zone map Verified on site, block number and visual identification is clearly marked for reference. | 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 - | The annual business plan is available. The estate had an annual budget with a 3 years projection as stated in the annual budget. This business plan is prepared as guidance for future planning. The budget contains monthly budget per operating units including FFB, CPO and PK. Component of operating expenditure includes Administration, harvesting & collection, field upkeep, transportation, road and bridges etc. Inclusive in the business plan is also Capital Expenditure (CAPEX) | Complied |

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|-----------------------|--|--|------------|----|------|--------|------|--------|------|-------|------|-------|------|-------|----------|
| | | includes building-general, tractors and agricultural implement, office equipment and others as per the annual budget for 2018 for estate was sighted and verified. | | | | | | | | | | | | | |
| 4.6.2.2 | 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. - Major compliance - | There is no replanting happened in Paya Kamunting. The projection for the replanting is available from 2019-2023. The breakdown of the replanting as a below: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Year</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>103.74</td> </tr> <tr> <td>2020</td> <td>117.58</td> </tr> <tr> <td>2021</td> <td>83.02</td> </tr> <tr> <td>2022</td> <td>99.56</td> </tr> <tr> <td>2023</td> <td>81.38</td> </tr> </tbody> </table> | Year | Ha | 2019 | 103.74 | 2020 | 117.58 | 2021 | 83.02 | 2022 | 99.56 | 2023 | 81.38 | Complied |
| Year | Ha | | | | | | | | | | | | | | |
| 2019 | 103.74 | | | | | | | | | | | | | | |
| 2020 | 117.58 | | | | | | | | | | | | | | |
| 2021 | 83.02 | | | | | | | | | | | | | | |
| 2022 | 99.56 | | | | | | | | | | | | | | |
| 2023 | 81.38 | | | | | | | | | | | | | | |
| 4.6.2.3 | The business or management plan may contain: 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 - Major compliance - | This requirement i.e crop material, crop projection, yield, production cost are available. It is provided in the business management plan shown in item 4.6.2.1 above. For example, crop projection/budget for 2019 is 24.68 yield per Ha compared to 2018 target: 21.80 yield per Ha. | Complied | | | | | | | | | | | | |
| 4.6.2.4 | The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. | The estates performance is recorded in the monthly progress report. Details on the actual vs budget i.e crop production, fixed and direct cost are shown therein. The management also provides variance report | Complied | | | | | | | | | | | | |

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| | - Major compliance - | on the performance and reviewed on a monthly basis. The progress report contains the updated actual usage as to date. | |
| Criterion 4.6.3: Transparent and fair price dealing | | | |
| 4.6.3.1 | Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance - | Contractors engaged by Genting has binding service agreement. Sample of agreement verified: <ol style="list-style-type: none"> 1. J.M Enterprise signed on 01/01/2018. 2. Segar a/I Mariappan signed on 01/01/2018. 3. JV Fast Enterprise signed on 01/01/2018. The pricing of the services is provided in the contract. | Complied |
| 4.6.3.2 | All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance - | During the interview with contractor, the payment for services by Genting was confirmed to be on timely manner. According to the contract, the payment shall be 30 days from the day of loading and transporting. Sample of invoice and payment note was verified: <ol style="list-style-type: none"> 1. Segar a/I Mariappan invoiced n 30/06/2018 and payment was made on 05/07/2018. 2. JM Enterprise invoiced on 03/07/2018 and payment was made on 05/07/2018. | Complied |
| Criterion 4.6.4: Contractor | | | |
| 4.6.4.1 | Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. | The contract agreement between the contractors and Genting had indicated the MSPO requirements and the requirement of the contractors to follow. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|--|----------------|
| | - Major compliance - | | |
| 4.6.4.2 | The management shall provide evidence of agreed contracts with the contractor. - Major compliance - | The contract reviewed includes: 1. J.M Enterprise signed on 01/01/2018. 2. Segar a/l Mariappan signed on 01/01/2018. 3. JV Fast Enterprise signed on 01/01/2018. | Complied |
| 4.6.4.3 | The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance - | The MSPO policy had demonstrated the commitment of the management to accept MSPO approved auditors to carry out assessment. | 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 - | The contractors involved in Bukit Sembilan are mainly FFB transporters. The legal document to acknowledge the task is the dispatch receipt issued by the weighbridge operator. | Complied |
| 4.7 Principle 7: Development of new planting | | | |
| Criterion 4.7.1: High biodiversity value | | | |
| 4.7.1.1 | Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|--|----------------|
| 4.7.1.2 | No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |
| Criterion 4.7.2: Peat Land | | | |
| 4.7.2.1 | New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |
| Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA) | | | |
| 4.7.3.1 | A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |
| 4.7.3.2 | SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |



| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|--|----------------|
| | - Major compliance - | | |
| 4.7.3.3 | The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |
| 4.7.3.4 | Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |
| Criterion 4.7.4: Soil and topographic information | | | |
| 4.7.4.1 | Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |
| 4.7.4.2 | Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |
| Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|--|----------------|
| 4.7.5.1 | Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |
| 4.7.5.2 | Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |
| 4.7.5.3 | Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |
| Criterion 4.7.6: Customary land | | | |
| 4.7.6.1 | No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|----------------|
| 4.7.6.2 | Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |
| 4.7.6.3 | Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |
| 4.7.6.4 | The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - Major compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |
| 4.7.6.5 | Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |
| 4.7.6.6 | A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|----------------|
| 4.7.6.7 | The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |
| 4.7.6.8 | Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance - | No new development and new planting after January 2015. Thus, this indicator is not applicable | Not applicable |

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 comply with the MS 2530-3:2013. It is recommended that the certification of Genting Bukit Sembilan Estate is approved. | |
| Acknowledgement of Assessment Findings | Report Prepared by |
| Name: Tan Cheng Huat | Name: Mohamed Hidhir Zainal Abidin |
| Company name: Genting Plantations Berhad | Company name: BSI Services Malaysia Sdn Bhd |
| Title: Senior Vice President – Plantation (Malaysia) | Title: Lead Auditor |
| Signature:  | Signature:  |
| Date: | Date: 17/12/2018 |

Appendix A: Assessment Plan

| PRELIMINARY AGENDA | | | | |
|---|------------------|---|---------------|-----------------|
| Date | Time | Subjects | Hidhir | Nicholas |
| Friday 27/7/18 Genting Bukit Sembilan Estate | 0730 am | Audit team travelling to Bukit Sembilan Estate | √ | √ |
| | 08.30 – 09.00 | Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan | | |
| | 09.00 – 12.30 | 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. | √ | √ |
| | 12.30 – 13.30 | Lunch | √ | √ |
| | 13.30 – 15.00 | Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices, P7: Development of New Planting (if any) | √ | √ |
| | 15.00 – 15.30 | Audit team discussion and preparation for closing meeting | √ | √ |
| | 16.00 | Closing meeting | √ | √ |
| | 17.00 | End of audit. Audit team travelling back to KL | √ | √ |

Appendix B: List of Stakeholders Contacted

| List of Stakeholders Contacted | |
|--|---|
| <p>Internal Stakeholders</p> <p>Workers' Representative</p> <p>Women's Representative</p> | <p>Union/Contractors/Local Communities</p> <p>Squatters</p> <p>Contractors</p> |
| <p>Government Departments</p> <p>nil</p> | <p>NGO</p> <p>nil</p> |

Appendix C: Smallholder Member Details

Not applicable

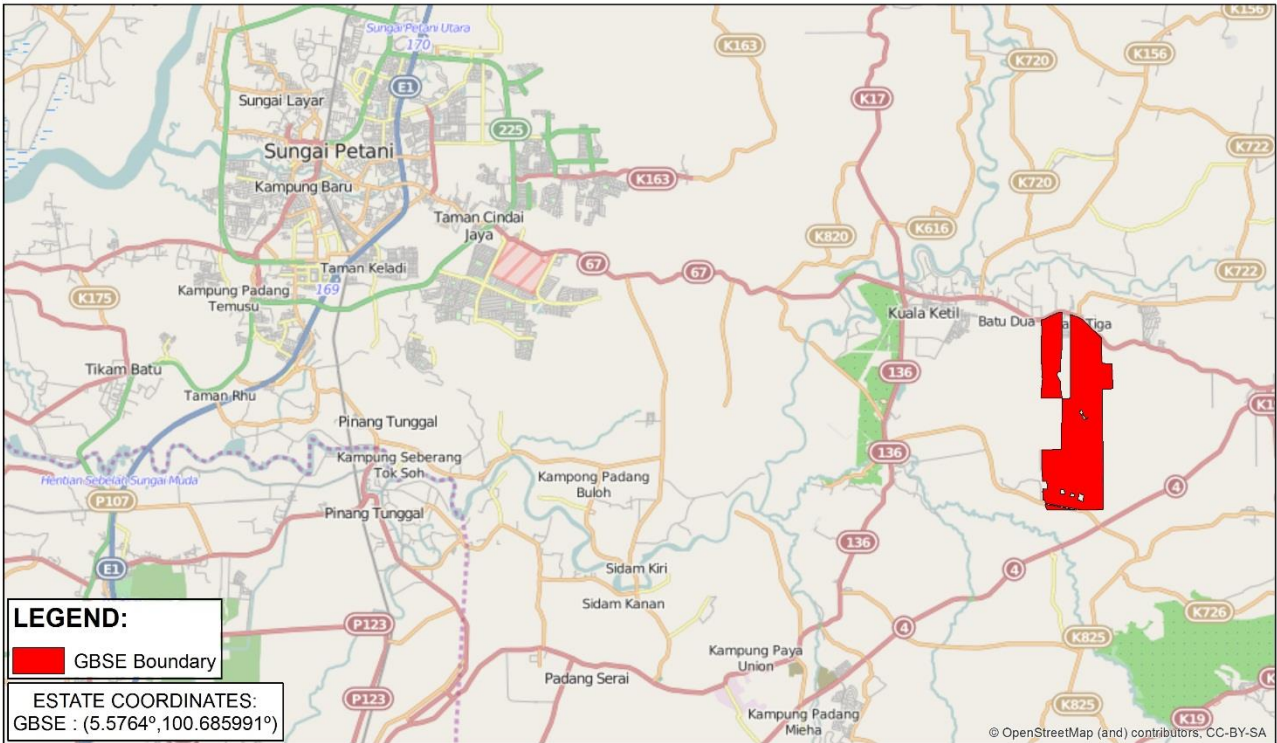
Appendix D: Location and Field Map



LOCATION MAP
GENTING BUKIT SEMBILAN ESTATE



Scale 1:131,700



Appendix F: 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 |
| 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 |