

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

Genting Plantations Berhad
Client company Address: Genting Plantations Berhad 10th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 K.L
Certification Unit: Genting Jambongan Oil Mill Location of Certification Unit: Jambongan Island, 90100 Beluran District, Sabah, Malaysia

Report prepared by:
Muhammad Fadzli Masran (Lead Auditor)

Report Number: 9752717

Assessment Conducted by:
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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
MPOB License	Genting Jambongan Oil Mill: 587904004000 Genting Jambongan Estate: 509406502000		
Company Name	Genting Plantations Berhad		
Address	10th Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia.		
Group name if applicable:	-		
Subsidiary of (if applicable)	Genting SDC Sdn Bhd		
Contact Person Name	Mr Tan Cheng Huat (Senior Vice President – Plantation Division)		
Website	http://www.gentingplantations.com	E-mail	chenghuat.tan@genting.com
Telephone	03 2333 6510 (Head Office) 089 257112 (GJOM)	Facsimile	03 2333 6575

1.2 Certification Information			
Certificate Number	Mill: MSPO 709462 Estate: MSPO 709464		
Issue Date	09/08/2019	Expiry date	08/08/2024
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Stage 1 Date	13 – 14/5/2019		
Stage 2 / Initial Assessment Visit Date (IAV)	15 – 16/5/2019		
Continuous Assessment Visit Date (CAV) 1	N/A		
Continuous Assessment Visit Date (CAV) 2	N/A		
Continuous Assessment Visit Date (CAV) 3	N/A		
Continuous Assessment Visit Date (CAV) 4	N/A		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE119-60184826	ISCC	ASG Cert	05.12.2019

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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 Jambongan Oil Mill	Jambongan Island, 90100 Beluran District, Sabah, Malaysia	117° 27' 3.3" E	6° 38' 59.3" N
Genting Jambongan Estate	Jambongan Island, 90100 Beluran District, Sabah, Malaysia	117° 27' 3.3" E	6° 38' 59.3" N

1.4 Plantings & Cycle					
Estate	Age (Years) - ha				
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30
Genting Jambongan Estate	439.89	71.76	3381.62	0	0
Total	439.89	71.76	3381.62	0	0

1.5 FFB Production (Actual) and Projected (tonnage)			
Producer Group	Projected from last audit	Actual production last 12 months	Projected production for next 12 months (July 2019 – Jun 2020)
Genting Jambongan Estate	N/A	N/A	70591.00
Total	N/A	N/A	70591.00

1.6 Certified CPO / PK Tonnage			
Mill	Estimated (Previous Year)	Actual (This Year)	Forecast (Next Year)
Genting Jambongan Oil Mill 20 MT/hr	CPO (OER: %)	CPO (OER: %)	CPO (OER: %) 23%
	N/A	N/A	16235.93 mt
	PK (KER: %)	PK (KER: %)	PK (KER: %) 4.20%
	N/A	N/A	2964.82 mt

1.7 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Jambongan	3893.27	24.36	144.67	4062.30	95.84

TOTAL	3893.27	24.36	144.67	4062.30	
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1.8 Details of Certification Assessment Scope and Certification Recommendation:

BSI Services Malaysia Sdn Bhd has conducted the Initial Certification Assessment of Genting Jambongan Oil Mill, located in Jambongan Island, Beluran District, Sabah, Malaysia comprising one Palm oil Mill and one FFB supplying 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 Plantations and Organized Smallholders and MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill.

The onsite assessment was conducted on 15 – 16/5/2019.

Based on the assessment result, Genting Jambongan Oil Mill complies with the MS 2530- 3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders and MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill and recommended for certification.

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
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BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 15 – 16/5/2019. The audit programme is included as Appendix A. The approach to the audit was to treat the Genting Jambongan Oil Mill and its supply base, Genting Jambongan Estate as a MSP0 Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 or MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The estates or smallholders sample were determined based on formula $S = r\sqrt{n}$ where n is the number of estates while when applicable, the smallholders sample were determined following the MSP0 Certification Requirement. The sampling of smallholders were based on the formula $(r\sqrt{n})$; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix C.

Public notification was made on 3/4/2019. Meetings were held with stakeholders to seek their views on the performance of the company with respect to the MSP0 requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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

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

This report was externally reviewed by MSP0 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 Jambongan Oil Mill	√	√	√	√	√
Genting Jambongan Estate	√	√	√	√	√
Stakeholder Consultation	√				√

Tentative Date of Next Visit: May 12, 2020 - May 13, 2020

Total No. of Mandays: 4

BSI Assessment Team:

Muhammad Fadzli Masran – Lead Assessor

He graduated in Bachelor of Forestry Science at University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers’ welfare, workers’ occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. He had accumulated auditing experience when he was the internal auditor for ISO9001 and ISO14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in April 2018, endorsed RSPO Lead Auditor Course in July 2018 and endorsed MSP0 Lead Auditor Course in October 2018. During this assessment, he assessed on the aspects of environmental and estate best practise. He is fluent in Bahasa Malaysia and English languages.

Valence Shem – Team Member

He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSP0 Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. Able to communicate in Bahasa Malaysia and English

Accompanying Persons: N/A

Section 3: Assessment Findings

3.1 Details of audit results

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

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

3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During the Certification Assessment there were four (4) Minor nonconformities raised. The Genting Jambongan Oil Mill and Supply Base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Minor Nonconformities:		
Ref	Area/Process	Clause
1777443-201904-N1	Palm Oil Mill	4.3.1.1 - Part 4
Requirements:	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.	
Statement of Nonconformity:	The mechanism to ensure the compliance with laws and regulation is not effectively implemented	
Objective Evidence:	<p>The assessment done by the mill management for ensuring compliance was not captured the non-compliance as follows:</p> <ul style="list-style-type: none"> i. Current boilerman competency at the mill is Boilerman Grade 2, Certificate no. SB/18/EIS/02/00072. The mill is required to hire Boilerman Grade 1 by the DOSH as written the visit report dated 5/3/2019. ii. Current electrical charginan competency is category AO. Certificate no. PJ 1130272 was not complied with the act. iii. No visiting engineer at Genting Jambongan Mill iv. There is no evidence that the weekly line-site inspection has been conducted. Based on weekly line-site record, it was only conducted once in March 2019. 	
Corrections:	<ol style="list-style-type: none"> 1. Current boilerman will be sent for any 1st grade Boilerman test held after 18 October 2019. 2. The current charginan will be registered for the competency course in this year. Alternatively, to advertise on the position through banner and/or online channel. 3. Obtain more contact of VEE to negotiate to visit Jambongan Mill. 	

	<ol style="list-style-type: none"> HA will produce a new weekly line site inspection schedule that will cover all estate and mill labour quarters in weekly basis and the new appointed HA assistant will be trained to conduct this inspection.
Root cause analysis:	<ol style="list-style-type: none"> Boilerman (Mohammad Subala) had obtained 2nd Grade Boilerman on 18 April 2018. To take the 1st grade test, he needs to go through retention period of 18 months before he can sit for the 1st Grade Boilerman test. Current chargeman not able to find available part time course for A4 competency through Institut Latihan Perindustrian (ILP) and difficult to find Grade A4 chargeman. GJOM Location and security concern by VEE caused them to not willing to visit Jambongan Oil Mill. Due to the distance between line site and the HA didn't have a trained assistant to help conduct the inspection, the line site inspection conducted by HA did not cover all labour quarters in weekly basis and the current practice is one division line site per week.
Corrective Actions:	<ol style="list-style-type: none"> To ensure the boilerman complete the 1st Boilerman Grade test and get the competency. To ensure the chargeman complete the full competency course until obtain competency for A4. Provide good accommodation and arrange for security escort once able to confirm visit by VEE. HA together with his assistant will conduct the weekly line site inspection based on schedule produced. With this method, all line site will be inspected every week without miss. All the inspection report will be review by Estate and Mill Manager.
Assessment Conclusion:	The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment.

Minor Nonconformities:

Ref	Area/Process	Clause
1777443-201904-N2	Palm Oil Mill	4.4.4.2 - Part 4
Requirements:	The occupational safety and health plan should cover the following: b) The risk of all operations shall be assessed and documented	
Statement of Nonconformity:	The existing control measure stated in HIRARC is not effectively implemented	
Objective Evidence:	GJPOM has conducted risk assessment for all the mill operations and support activities and documented the HIRARC reports. However, during the visit at the workshop, it was observed that the unsafe condition as the grinder was left on the floor which can cause accident.	
Corrections:	Briefing will be done to workshop team during muster regarding safety and possibility hazards at work place during do the job.	

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Root cause analysis:	Communication and briefing regarding mill risk assessment and HIRARC to all the mill workers was not fully effective.
Corrective Actions:	<ol style="list-style-type: none"> Briefing regarding HIRARC for all work station in the mill will be included in the Annual Training Plan and will be done once every 3 month and will be recorded. Provided storage cabinet (fabricate from reusable plate) to ensure the grinder put at safe place after done the maintenance work with proper labeling of storage place.
Assessment Conclusion:	The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment.

Minor Nonconformities:		
Ref	Area/Process	Clause
1777443-201904-N3	Plantations	4.4.5.6 - Part 3
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:	The explanation about entitlement of annual leave was not effective	
Objective Evidence:	Based on interview with two workers (Oktavianus & Severinus), it was noted that they did not know about their entitlement of paid annual leave.	
Corrections:	GJBE will do a refresh briefing to all workers regarding their signed worker agreement so that workers will always remember and know their privilege as stated in the agreement including the entitlement of paid annual leave.	
Root cause analysis:	GJBE did not do or scheduled any refresh briefing regarding the workers agreement to all workers.	
Corrective Actions:	GJBE will include the refresh briefing on workers contract in the Annual Training Plan and this briefing will be scheduled to be done twice a year, every 6 months and recorded.	
Assessment Conclusion:	The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment.	

Minor Nonconformities:		
Ref	Area/Process	Clause
1777443-201904-N4	Plantations	4.4.5.11 - Part 3
Requirements:	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.	
Statement of Nonconformity:	The weekly line-site inspection report by the Medical Assistant was found not consistent with on-site visit.	
Objective Evidence:	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'	

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	<p>Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p>Based on the evaluation of the line-site (and crèche) weekly inspection report for workers housing at Division 3, the following conditions were found not consistent with the on-site visit by the auditor:</p> <ul style="list-style-type: none"> - Availability of soap at the crèche ayah - Availability of fire extinguisher at the crèche ayah - Condition of ceiling at the crèche ayah - Availability of recycle bins at the line-site - Condition of one of the septic tanks at the line-site - Condition of pipeline from water treatment to water tanks
Corrections:	HA will conduct the line site inspection specifically as per the Line Site Inspection form produced.
Root cause analysis:	The current line site inspection checklist was not effective.
Corrective Actions:	The line site checklist will be reviewed and to brief to HA on line site inspection method as per the line site checklist produced.
Assessment Conclusion:	The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment.

Noteworthy Positive Comments	
1	Good commitment from the management
2	Positive comments from all stakeholders interviewed
3	All personnel were cooperative during the assessment process

3.3 Status of Nonconformities Previously Identified and OFI

Not applicable.

3.4 Issues Raised by Stakeholders

IS #	Description
1	<p>Issues: <u>Royal Malaysian Army –Sri Jambongan Base Camp</u> Genting Jambongan Estate & Mill has given a good cooperation to the Royal Malaysian Army team. Example are water supply request from army camp base provided by Genting management, Genting management’s assistance during the Ministry of Defence visit and army patrol during Genting visitor. The safety and security in Jambongan Island is still under control and so far, there is no encroachment issue from outsider.</p> <p>Management Responses: Management noted on the information and will continue the good practices.</p> <p>Audit Team Findings: No other issue.</p>
2	<p>Issues: <u>Klinik Kesihatan Jambongan</u> There is about 42 Genting foreign workers has a total of RM 4,805.00 debts with Klinik Kesihatan especially on the maternity issue. Nurses & Medical Assistant has already raised the issue during stakeholder meeting last year on November 2018 however still not solved. The patients are commonly didn’t has enough money and deposited less than the registration price which making it difficult for receipt issuance from Klinik Kesihatan. Since the issue is keep repeating, the clinic team suggested that if there is pregnant foreign worker, please send them back to have the proper treatment from home country.</p> <p>Management Responses: Management will take action on the workers involved and solve this issue with KK.</p> <p>Audit Team Findings: Will be verified in the next surveillance audit.</p>
3	<p>Issues: <u>SK Jambongan</u> There is no foreign worker’s children study in SK Jambongan at the moment. However, if the parents have a valid document, they can always register their children by fill in the form in school and it will be submitted to PPD for approval first. If approved, the children can register in SK Jambongan. Management also give contribution on the clean water request to school.</p> <p>Management Responses: Management noted on the information and will continue the good practices.</p> <p>Audit Team Findings: No other issue.</p>
4	<p>Issues: <u>Genting Auxiliary Police</u> So far, the security in Jambongan Island is under controlled. The patrolling on estate was conducted continuously and they were having a good cooperation with the Royal Army Malaysian team in the island.</p> <p>Management Responses: Management noted on the information and will continue the good practices.</p> <p>Audit Team Findings: No other issue.</p>
5	<p>Issues: <u>Ketua Anak Negeri – Kampung Jambongan</u> Management has contributed on the clean water and water tanks to the villagers in Jambongan Island. Apart from that, the road maintenance, culvert installation and job opportunity also provided by both Genting Jambongan Oil Mill and Genting Jambongan Estate.</p> <p>Management Responses: Management noted on the information and will continue the good practices.</p>

	Audit Team Findings: No other issue.
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3.5 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1777443-201904-N1	Minor	16/5/2019	To be verified during next assessment.
1777443-201904-N2	Minor	16/5/2019	To be verified during next assessment.
1777443-201904-N3	Minor	16/5/2019	To be verified during next assessment.
1777443-201904-N4	Minor	16/5/2019	To be verified during next assessment.

3.6 Summary of the findings by Principles and Criteria

Part 3: General principles for Plantations and Organized Smallholders

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 -	Policy of MSPO for Genting Plantations is available in Genting Jambongan Estate dated 18 March 2014 approve by President Mr Yong Chee Kong.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	As per Indicator 4.1.1.1 the Genting MSPO policy has emphasized on the commitment to continual improvement with the objective of improving the milling operation cover in Safety, Social and environment.	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 -	Internal Audit has been conducted on 26-27/3/2019 by personnel from Sustainability Department, Genting Plantation Office Sabah (GPOS). 2 NCR and 6 Observations were raised as a result of the audit. All of the NCRs have been closed by the lead auditor on 30/4/2019.	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	Internal Audit procedure is available under SMPM (sustainability management procedure manual), entitled "Sustainability Internal Audit" document no SMP-GPB-03, rev. 4, dated 25 May 2018. Among	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	implement the necessary corrective action. - Major compliance -	the contents covered in the procedure are audit criteria, audit schedule, audit plan, responsibility of lead auditor & auditee and audit report, which to be kept for 10 years.	
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	Report of Internal Audit for Genting Jambongan Estate (dated 29/3/2019) was made available for review.	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 -	Management Review procedure was established accordingly, refer to Sustainability Management Procedure Manual (SMP-GPB-06), rev. 1, dated 25/5/2018. The 1st MRM for MSPO was done on 6/5/2019 participated by the estate and mill personnel under Genting Jambongan unit. Among the agenda discussed in the meeting were: 1) Status of outstanding issues from previous meetings 2) Changes, improvement or modification of the sustainability management system (SMS) 3) Internal and external audit findings (SMS) 4) Complaints and grievance book 5) Enquiry register book 6) Stakeholder management reports/minutes 7) Risk management 8) Greenhouse value 9) Review continual improvement status & recommendations 10) Review on resource & training requirements 11) Review on sustainability policy & its objectives status 12) Review of effectiveness in achieving QEO objectives	Complied

Criterion / Indicator		Assessment Findings	Compliance
		13) Compliance status on legal & other requirements 14) Other matters 15) Preventive & corrective actions 16) Recommendations for improvement 17) Result of internal RSPO SCCS & MSPO SCCS audit 18) Customer feedback 19) Changes that could affect the management system	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -	Addressed in SMPM Procedures for Continual Improvement of Sustainability Management System (RSPO/MSPO/ISCC). The Continuous Improvement Plan dated 20/4/2019 was available for verification. Among the action plans established were: <ul style="list-style-type: none"> - to improve environmental aspects and impacts risk assessment and risk control - minimise soil erosion - conserve HCV areas and riparian buffer zones - to receive and act on any environmental complaints through internal and external communication - maximising recycling and minimising waste or by-products generation - continue make full use of the biomass wastage - pollution prevention/mitigation plan drawn up based on identified wastes and pollutants 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - to hold regular meetings with stakeholders to further enhance the communication and feedback - efficient water consumption and good quality - utilisation of compost as fertiliser - to instil good health & safety culture in the community 	
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>Action plan is available in Jambongan Estate, the action plan is cover for environment, workers' needs, safety and others. Trainings on SOPs were also conducted from time to time to enhance the current techniques of agriculture best practice. This was evident through availability of training records and interview with workers.</p>	Complied
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>The new information and techniques to improve practices are obtained mainly through information from suppliers and being members of associations related to palm oil industry (e.g. ISP).</p>	Complied
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</p>	<p>Genting Jambongan Estate is transparent and open to communicate its information on environmental, social and legal issues relevant to sustainability practice to the public, e.g. GJOM has distributed a notification to its stakeholders where the types of documents and</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	disclosure that could result in negative environmental or social outcomes. - Major compliance -	information can be obtained by the public upon request: Among the documents can be obtained are: <ul style="list-style-type: none"> • Land title • Policies • Reports (EAI, SIA, minutes of meeting, HCV report, audit reports) • Action plans (pollution prevention, continual improvement, OHS) • Procedures (complaints & grievances, negotiation & compensation, sexual harassment) This is addressed in its Sustainability Management Procedure Manual, Procedures on Request and Responses [SMP-GPB-25, rev. 00, 14/8/2014]. Means of communication is spelt out in clause 3.1.1 of the procedure e.g. meetings, telephone, walk in to office, letter, e-mail, fax, etc.	
4.2.1.2	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. - Major compliance -	The management documents which are publicly available are mentioned in Indicator 4.2.1.1. Any request of information shall be recorded in "Enquiry Register Book" (ref.: Clause 3.1.2 of the above procedure). Verification of the book showed that there has been no request made of the above mentioned subjects ever since the last assessment.	Complied
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 -	Procedure is available entitled Sustainability Management Procedure Manual, Consultation and Communication [SMP-GPB-17, rev. 02, 23/2/2018].	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 -	All issues and grievances are handled by the manager of the operating unit. If the issue be beyond the manager jurisdiction, it shall be forwarded to the Head Office. This is addressed in Clause 3.9 of the procedure.	Complied
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 -	The list of stakeholders was last updated in 1/3/2019 which consists of government agency, suppliers/contractors and surrounding communities. There have been two meetings with the stakeholders i.e. on 29/10/2018 (external stakeholders – contractors, suppliers & surrounding communities) and 13/4/2019 (external stakeholders – government agencies, surrounding communities, suppliers). Minutes of meetings were available for verification.	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 traceability implementation is addressed in a procedure, SMPM, Traceability (Estate) [SMP-GPB-09, rev. 4, 24/8/2018].	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Inspection on compliance with the traceability procedure is regularly checked through supply chain internal audit. The internal audit report dated 16/4/2019, which was carried out together with other schemes such as RSPO, was available for verification. There were 4 NCRs raised as a result of the audit.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The Estate Manager is the person assigned to implement and maintain the traceability system.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	The records and documents related to FFB traceability such as bunch chit, weighbridge tickets and daily FFB delivery records were adequately maintained.	Complied
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	GJE had continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Mill had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were: i. MPOB License no. 509406502000, validity 1/12/18 – 30/11/2019. ii. Lesen bagi pemasangan persendirian, no. 2018/01334, no. 2018/01331 validity 26/7/18-25/7/19 and #2018/01333, validity 8/7/18-7/7/19 iii. Lesen untuk menggaji pekerja bukan pemastautin, validity 13/8/18-12/8/19 iv. Certificate of fitness (CF) no. SB PMT 13039, validity until 4/6/20 for air receiver v. Boat License no. LC SSK 2018/49263, valid until 29/10/2019 vi. Small Ship License no. 0467/2017 1469/2018, valid until 13/12/19	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.3.1.2</p> <p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>The relevant laws were listed in Legal Requirement Register (LRR) [SMP-GPB-22, rev. 7 dated 19 April 2019]. Among the laws covered in the list were EQA, Employment Act, OSHA, FMA to name a few. The amendment/update of the list is done by Systems, Methods, Insurance and Risk Management Department (based in KL).</p>	<p>Complied</p>
<p>4.3.1.3</p> <p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>Among the newly registered laws were:</p> <ul style="list-style-type: none"> - Minimum Wage Order (from 2016 to 2018) - Employment (restriction) Act 1968 (from 2006 to 2017) - Drainage and irrigation ordinance, 1956 (Sabah No. 15 1956) - Sabah water resources enactment 2002 (Sabah) Amendment – 31/12/2004 - Environmental Impact Assessment (order 2005) - Wildlife conservation Enactment 1997 - Forest Enactment 1968 (Sabah) - Employment Insurance System Act 2017 - Sabah Labour Ordinance Cap 67, 1950 - EQ (Clean Air) Regulations (from 1978 to 2014) - Employees Social Security (Exemption No. 2) Notification 2018 	<p>Complied</p>
<p>4.3.1.4</p> <p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>A mechanism for tracking changes in law is guided by SMPM Procedures on Regional, National and International Laws [SMP-GPB-21, rev. 1, 14/4/2014]. Generally the mechanism is by monitoring or consultation with various sources (e.g. government agencies, electronic & non-electronic media, legal firms, professional bodies, industry association/organization and NGO). The Genting’s Systems, Methods, Insurance and Risk Management Department (based in KL) is the person responsible to handle the task.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance																	
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 -	The oil palm cultivation activities of Jambongan Estate do not diminish the land use rights of other users. The conditions stipulated in the land title was adhered to.	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 -	Genting SDC acquired land in GJBE directly from Sabah State Government and previous land owners. The estate owned 597 land titles. All documents regarding the legal ownership of the land are available for review. Sighted the sample land title as follows: <table border="1" data-bbox="1048 821 1870 1342"> <thead> <tr> <th data-bbox="1048 821 1460 887">Grant No.</th> <th data-bbox="1460 821 1870 887">Hectare</th> </tr> </thead> <tbody> <tr> <td data-bbox="1048 887 1460 952">CL085310505</td> <td data-bbox="1460 887 1870 952">101.78 ha</td> </tr> <tr> <td data-bbox="1048 952 1460 1018">CL085311986</td> <td data-bbox="1460 952 1870 1018">167.69 ha</td> </tr> <tr> <td data-bbox="1048 1018 1460 1083">CL085325622</td> <td data-bbox="1460 1018 1870 1083">207.26 ha</td> </tr> <tr> <td data-bbox="1048 1083 1460 1149">CL085311995</td> <td data-bbox="1460 1083 1870 1149">101.48 ha</td> </tr> <tr> <td data-bbox="1048 1149 1460 1214">CL085337337</td> <td data-bbox="1460 1149 1870 1214">199.89 ha</td> </tr> <tr> <td data-bbox="1048 1214 1460 1279">NT083193364</td> <td data-bbox="1460 1214 1870 1279">5.05 ha</td> </tr> <tr> <td data-bbox="1048 1279 1460 1342">NT083193382</td> <td data-bbox="1460 1279 1870 1342">5.03 ha</td> </tr> </tbody> </table>	Grant No.	Hectare	CL085310505	101.78 ha	CL085311986	167.69 ha	CL085325622	207.26 ha	CL085311995	101.48 ha	CL085337337	199.89 ha	NT083193364	5.05 ha	NT083193382	5.03 ha	Complied
Grant No.	Hectare																		
CL085310505	101.78 ha																		
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NT083193382	5.03 ha																		

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Criterion / Indicator		Assessment Findings		Compliance
		NT083193579	4.97 ha	
		NT083074337	5.82 ha	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The Estate has maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers the estate visited confirmed that they were clearly marked and maintained.		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 be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There was no land disputes at Jambongan Estate. Interview with the local communities confirmed that they have no issues with regards to land dispute.		Complied
Criterion 4.3.3 – Customary rights				
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There was no land encumbered by customary rights at Jambongan Estate.		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 was no land encumbered by customary rights at Jambongan Estate.		Complied

Criterion / Indicator		Assessment Findings	Compliance
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There was no land encumbered by customary rights at Jambongan Estate.	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 -	<p>The Social assessment for Genting Jambongan Estate was conducted internally by the Sustainability Department. The last SIA was conducted in 31/3/2019. The assessment also incorporated the inputs obtained during the initial SEIA in October 2014. Among the groups consulted were</p> <ul style="list-style-type: none"> - local workers - foreign workers - workers representative - old, young and middle aged workers/residence - contractors & suppliers - villagers (e.g. Kg Limau-limau, Kg Malalin, Kg Hujung, Kg Bahanan) - smallholders - shop. school, etc. - government officers (e.g. Auxiliary Police, SK Jambongan, Pegawai Anak Negeri, Energy Commission, DOSH) <p>Key areas identified in the SIA were on economic livelihood/quality of life, environment, health & wellbeing, and community, families &</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>individuals. Both positive and negative impacts were identified in the SIA.</p> <p>The recommendation from the SIA report was transferred to action plan. The action plan identified the issues & strategies, action plan, responsible person and time frame for both positive and negative impact.</p>	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>System for dealing with complaints and grievances is spelt out in Sustainability Management Procedure Manual, Complaints and Grievances [SMP-GPB-19, rev. 3, 21/3/2018].</p>	Complied
4.4.2.2	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p>- Major compliance -</p>	<p>The system was found to be effective in managing complaints. Based on records in the "Complaints/Grievances Record Book", there were 16 complaints registered which mostly were about facilities such as housing, transportation and accessibility conditions. The issues were found to be well addressed and recorded by the estate.</p>	Complied
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p>- Minor compliance -</p>	<p>Complaint forms were available in Complaints/Grievances Record Book. The format includes the information such as name of complainant, passport/NRIC, phone no., address, issue, date of complaint, details of action taken, verification by manager and acknowledgement by complainant.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.4.2.4	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p> <p>- Minor compliance -</p>	<p>Employees and surrounding communities were made aware of the mechanism of handling complaints through stakeholders meeting, policy training and morning briefing. This was recorded in the following records:</p> <ul style="list-style-type: none"> - ISCC, RSPO & MSPO briefing on 27/4/2019, attended by 29 persons - Stakeholders consultations meeting (e.g. conducted on 13/4/2019, where explanation about the flowchart procedure of complaints/grievances mechanism was recorded in the minutes) 	Complied
4.4.2.5	<p>Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.</p> <p>- Major compliance -</p>	<p>Records of complaints were maintained in the Complaints/Grievances Record Book and records for the past 24 months were still available.</p>	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	<p>Growers should contribute to local development in consultation with the local communities.</p> <p>- Minor compliance -</p>	<p>Genting Jambongan continues to contribute to local development through consultation with the local communities. Based on records and interview with the locals, among the contributions made by the estate were:</p> <ul style="list-style-type: none"> - donation of school bags to SK Jambongan students - donation of plywood for SK Jambongan study desks - donation of water tanks to surrounding villages - road accessibility maintenance - donation of beef during Hari Raya to villages 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		- transportation facilities to surrounding villagers	
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 -	Genting SDC has established the Safety and Health Policy signed by President & Chief Operating Officer dated 1/7/2018. In the policy stated the commitment of the group to provide and ensure safe work environment to all the workers and other party involved in the company activities. The policy was communicated through morning briefing, training and displayed at notice board at designated place in the mill. The estate has established Safety and Health management plan and	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: 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	Genting SDC has established the Safety and Health Policy signed by President & Chief Operating Officer dated 1/7/2018. The policy was communicated through morning briefing, training and displayed at notice board at designated place in the mill. Latest training was conducted on 18/1/2019 and 13/3/2019 The estate has conducted safety and health assessment for all operations and documented in Hazard Identification, Risk Assessment and Risk Control register. The HIRARC was reviewed at minimum of once a year and when necessary. Review was conducted by the Group Safety Officer. Latest review was conducted on 25/1/2019. The estate has established training program for employees exposed to pesticides used in the estate to ensure the continuous awareness to	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>the employee. The training was conducted by the Estate Manager, Asst. Manager, and other competent person on the training subject to the supervisors and operators. Sighted the training records as follows:</p> <p>i. Sprayer – PPE, SOP, HIRARC, Re-Entry Period, First Aid and Riparian Zone training dated 12/3/2019</p> <p>ii. SOP, Safety Policy, HIRARC and Chemical Calibration training dated 12/3/2019</p> <p>iii. Spillage Kit at Fertilizer and chemical store training dated 28/1/2019</p> <p>iv. Rat Baiting – PPE, SOP and HIRARC training dated 1/3/2019.</p> <p>The management provide appropriate PPE to the employee's base on the job type. The PPE given as per HIRARC and Standard Operating Procedure. PPE issuance was recorded in Borang Pemberian dan Penggantian PPE by individual basis. Sighted the PPE issuance records for employees as follows:</p> <p>i. E01497</p> <p>ii. E01691</p> <p>iii. E01509</p> <p>iv. E01487</p> <p>The management has established SOP for handling chemical and documented in the System Procedure: Chemical Management. Refer document no. SP-MGR-08 dated 1/8/2017.</p> <p>Genting SDC appointed the Estate Manager as the person responsible for workers safety and health. The estate management has established Safety and Health committee consist representatives from Employer</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>and Employee as per appointment letter signed by the Estate Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting.</p> <p>The management has established SOP for handling chemical and documented in the System Procedure: Chemical Management. Refer document no. SP-MGR-08 dated 1/8/2017.</p> <p>The management has established OSH committee consist of management and employee representative. The committee hold meetings to discuss safet and health issue on quarterly basis.</p> <p>Genting SDC has established accident and emergency procedure and documented in System Procedure: Emergency Response Procedure. Refer document no. SP-MGR-04 dated 1/8/2017. Interview with the workers shows the understanding regarding accident and emergency procedures in the mill.</p> <p>Sighted during site visit, the mandore were provided with first aid box. During interview shows the understanding on basic 1st aid during accident/injury occur.</p> <p>The mill monitored and kept record for all accident cases and recorded in the Accident Statistic Report which submitted to the Group Safety Officer on monthly basis.</p> <p>The accident occurred was reviewed on quarterly basis during OSH committee meeting.</p>	
<p>Criterion 4.4.5: Employment conditions</p>		

Criterion / Indicator		Assessment Findings	Compliance
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>Covered under Genting Plantations' Social Policy (Incorporating the Labour and Human Rights requirements), dated 22/6/2015, signed by Mr. Yong Chee Kong (President and Chief Operating Officer). Various methods of communication implemented by the estate to communicate the policy to its employees such as display on notice boards, briefing and training.</p>	Complied
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>Based on interview with employees from different backgrounds, there is no evidence that the management engage in or support any discriminatory practices. The commitment to no discrimination is also stated in the company's social policy.</p>	Complied
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>Based on sampled workers (employment no.: E01161, E01582, P00219, E01016, E01507, E01187, E01530, P00089, E01420, E01667) pay slips for Aug & Dec 2018 and Apr 2019, it was found that the employer has met the pay and conditions as per agreed in the employment contract agreement.</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>- Minor compliance -</p>	<p>The pay for employees of contractors was monitored by the management through obtaining the pay slips from the contractors for all their workers. Based on sampled workers (Siwat B. Lasmani) under employment of: FFB transporter Syarikat CM, the pay was found to be in accordance to legal requirements.</p>	Complied

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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>Employee data base is kept and maintained in the computer system (LyntraMax). All the required information by this standard was available in the data based.</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 contracts (Perjanjian Pekerjaan, version 1/12/2017) were available in language that understood by the workers. The contract has the details about the payments and employment conditions such as period of working, working hour, medical assistance, housing, holiday, annual leave, period of notice to terminate the contract, etc. However, the explanation about entitlement of annual leave was not effective. Based on interview with workers (i.e. Oktavianus & Severinus), it was noted that they did not know about their entitlement of paid annual leave. Thus, a non-conformity report was assigned due to this lapse.</p>	Minor NC
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	<p>Time recording for estate’s workers was done by the field staff by using the daily check roll. The check roll has the information about attendance, type of work and overtime of every worker.</p>	Complied
4.4.5.8	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p>	<p>Working hours and breaks were found to be in line with the legal requirement. Normal working hour is from 0530 hour to 1330 hour and a flexible an hour break in between is given. Based on payslip and</p>	Complied

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	- Major compliance -	working time records, the overtime paid for the workers were found to be complied with the legal regulations.	
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 -	Based on the samples mentioned in 4.4.5.3, wages and overtime was found to be in line with the legal regulations and employment contract.	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. - Minor compliance -	Other benefits such as motorcycle allowance and turn-out incentives were provided by the employer and verifiable in the pay slips. The establishment of estate clinic provides the medical care for the workers and their dependents.	Complied
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 -	The workers quarters was found to be habitable and in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446). Treated potable water and electricity were provided to the housing for free of charge. The water quality was analysed against the National Standard for Drinking Water Quality, 2 nd version, Jan 2004. The last analysis was conducted on 4/5/2019 for all the four workers housing complex by an accredited laboratory (SMM No. 576), [report ref. No: 20190409/05, 20190311/06, 20190311/07 and 20190311/05. Based on the results, the results were found to be compliant with the NDWQS. However, the weekly line-site inspection report by the Medical Assistant was found not consistent with on-site visit. Based on the evaluation of the line-site (and crèche) weekly inspection report for	Minor NC

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Criterion / Indicator		Assessment Findings	Compliance
		<p>workers housing at Division 3, the following conditions were found not consistent with the on-site visit by the auditor:</p> <ul style="list-style-type: none"> - Availability of soap at the crèche ayah - Availability of fire extinguisher at the crèche ayah - Condition of ceiling at the crèche ayah - Availability of recycle bins at the line-site - Condition of one of the septic tanks at the line-site - Condition of pipeline from water treatment to water tanks <p>Thus, a non-conformity report was assigned due to this lapse.</p>	
4.4.5.12	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>Sexual Harassment Policy has been established dated 3/8/2009 and signed by the Chief Operating Officer. The awareness of this policy among the workers was made through displaying of the policy at notice boards and briefing by the field staff. Apart from that it was also communicated through Policies briefing (on 8/1 & 13/3/2019). Handling of sexual and violence is guided by SMPM "Procedure On Prevention and Eradication of Sexual Harassment at The Workplace". As the point of this assessment, there has been no report related to sexual harassment or violence.</p>	Complied
4.4.5.13	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their</p>	<p>There is no trade union members in the estate. Nonetheless, there is also no restriction for them to join any trade union. This is recognized by the employer through establishment of people Policy dated 3/8/2009.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>		
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.</p> <p>- Major compliance -</p>	<p>Based on employees list, no children and young persons were recruited. The list was extracted from LintraMax system and has the information about date of birth and date of join.</p>	Complied
Criterion 4.4.6: Training and competency			
4.4.6.1	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p>- Major compliance -</p>	<p>The estate has established training program for all the employee and documented in GJBE Monthly training program. The training plan covers the estate operation, safety and health, policies, Environmental Aspects and Impacts, Environmental control procedure and etc. Sighted the training records as follows:</p> <ul style="list-style-type: none"> i. First Aid training dated 18/3/2019 ii. Firefighting using fire extinguisher dated 7/4/2019 iii. Manual manuring – SOP, PPE, First Aid Kit, ERP and HIRARC training dated 26/6/2018 iv. Harvesting- SOP, PPE, HIRARC and Policy dated 25/10/2018 	Complied

Criterion / Indicator		Assessment Findings	Compliance
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>	The estate has conducted Training need analysis to identified the training required for the employee. The analysis was conducted base on job designation and type of training required.	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>	The estate continuously provided the training to the workers as per plan. The training plan was reviewed on annually basis base on the training need analysis conducted.	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>Genting SDC has established Environmental Policy signed by the Chief Operating Officer dated 5/1/2009. In the policy stated the company commitment to ensure all operation are conducted in environmentally-responsible and sustainable manner.</p> <p>The policy was communicated to the employee through training, muster briefing and displayed at several notice board in the estate. Latest policy training was conducted on 18/1/2019 and 13/3/2019.</p>	Complied
4.5.1.2	The environmental management plan shall cover the following:	The estate has conducted the aspects and impacts analysis for all the operations and documented in the Identification of Environmental	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations.</p> <p>- Major compliance -</p>	<p>Aspect and Impact and Evaluation of Significance Form. The operation were analyzed based on the activity, type of operation, pollution generated and the impact of the activities to the environment.</p> <p>The estate has established Environmental Improvement and Management Plan base on the significant aspect identified during aspects and impacts analysis.</p>	
<p>4.5.1.3 An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>The estate has established Environmental Improvement and Management Plan base on the significant aspect identified during aspects and impacts analysis. The plan was reviewed on annually basis. Latest review was conducted on 10/2/2019.</p> <p>The plan stated the source of pollution identified, negative impacts, improvement/mitigation plan, data required, monitoring and action plan, person responsible and timeline.</p> <p>Sighted the implementation of the management plan as follows:</p> <p>i. The estate monitored the usage of fertilizer and pesticides on annually basis. Sighted the monitoring records for pesticides usage FY 2017 and 2018 as follows:</p> <ul style="list-style-type: none"> a. 2017 at 0.87 kg/ha b. 2018 at 0.79 kg/ha <p>ii. The estate has established scheduled for domestic waste collection. Sighted the records of payment for domestic was collection for tractor driver for month of April 2019</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	The program to promote positive impacts activities to the environment has been included in the Continuous Improvement Plan as follows: i. To minimize soil erosion a. Regular monitoring of soil erosion b. Minimize over spraying and established ground covers ii. Conserve HCV area and riparian buffer zone a. Regular monitoring of HCV area and riparian buffer zone b. Educate and create awareness among workers and staff	Complied
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	The estate has established training program for all the employee and documented in GJBE Monthly training program. The training plan , Policies, Environmental Aspects and Impacts, Environmental control procedure and etc.	Complied
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	Environmental related matters were discussed during muster briefing. Noted during interview with employee shows the understanding on the importance of environmental quality. The employee are also encouraged to discuss environmental issues with the management.	Complied
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			

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Criterion / Indicator	Assessment Findings	Compliance																								
<p>4.5.2.1 Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p>- Major compliance -</p>	<p>The monitoring of non-renewable energy usage was conducted on monthly basis. Sighted the records of diesel consumption per FFB production FY 2018 as follows:</p> <table border="1" data-bbox="1050 576 1512 1393"> <thead> <tr> <th>Month</th> <th>Diesel Consumption</th> </tr> </thead> <tbody> <tr><td>Jan 18</td><td>2.38</td></tr> <tr><td>Feb 18</td><td>2.37</td></tr> <tr><td>Mar 18</td><td>2.35</td></tr> <tr><td>Apr 18</td><td>2.44</td></tr> <tr><td>May 18</td><td>1.75</td></tr> <tr><td>Jun 18</td><td>2.27</td></tr> <tr><td>July 18</td><td>2.67</td></tr> <tr><td>Aug 18</td><td>2.69</td></tr> <tr><td>Sep 18</td><td>2.76</td></tr> <tr><td>Oct 18</td><td>2.91</td></tr> <tr><td>Nov 18</td><td>2.98</td></tr> </tbody> </table>	Month	Diesel Consumption	Jan 18	2.38	Feb 18	2.37	Mar 18	2.35	Apr 18	2.44	May 18	1.75	Jun 18	2.27	July 18	2.67	Aug 18	2.69	Sep 18	2.76	Oct 18	2.91	Nov 18	2.98	<p>Complied</p>
Month	Diesel Consumption																									
Jan 18	2.38																									
Feb 18	2.37																									
Mar 18	2.35																									
Apr 18	2.44																									
May 18	1.75																									
Jun 18	2.27																									
July 18	2.67																									
Aug 18	2.69																									
Sep 18	2.76																									
Oct 18	2.91																									
Nov 18	2.98																									

Criterion / Indicator		Assessment Findings		Compliance
		Dec 18	2.50	
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets.		Complied
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	No renewable energy used in the estate		Complied
Criterion 4.5.3: Waste management and disposal				
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	The estate had identified all waste products and its source of pollution and documented in Identification, segregation and Storage of Waste. The sampled identification was group base on the pollution source as follows: i. Workshop and mechanic area – Filters, lubricants, battery, rags, gloves, tyres, oxygen and acetylene, scrap iron ii. Vehicle used spare part store – Hydraulic hose, cylinders, dismantled equipment iii. Office and weighbridge – domestic, recyclable paper, PC and printer cartridges		Complied

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Criterion / Indicator		Assessment Findings	Compliance
		iv. Diesel Tank – Scheduled Waste v. Chemical Store – Containers, boxes vi. etc	
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 mill has established the waste management plan base on the waste identification conducted and reviewed on annually basis. The plan stated the source of pollution, management plan, monitoring and action plan, data required and person in charge. Sighted the implementation of the waste management plan as follows: i. Scheduled waste disposal records as follows: notes ii. Sighted the recycle bin were provided at several designated place such as store and housing area.	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 -	Genting SDC has established the SOP for handling of used chemicals and documented in System Procedure: Scheduled Waste. Refer document no. SP-MGR-09 dated 1/8/2017.	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	Empty pesticides containers were triple rinse and punctured and stored at the designated store before collected by the approved contractors, G-Planter for disposal. Sighted the UPPCR Collection Form by G Planter dated 20/2/2019 as follows:	Complied

Criterion / Indicator		Assessment Findings		Compliance												
	<p>labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p>- Major compliance -</p>	<table border="1"> <thead> <tr> <th>Type of containers</th> <th>Pieces</th> </tr> </thead> <tbody> <tr> <td>4 Liter</td> <td>69</td> </tr> <tr> <td>20 Liter</td> <td>31</td> </tr> <tr> <td>10 kg</td> <td>480</td> </tr> <tr> <td>Ally 500 g</td> <td>7</td> </tr> <tr> <td>Metal</td> <td>9</td> </tr> </tbody> </table>	Type of containers	Pieces	4 Liter	69	20 Liter	31	10 kg	480	Ally 500 g	7	Metal	9		
Type of containers	Pieces															
4 Liter	69															
20 Liter	31															
10 kg	480															
Ally 500 g	7															
Metal	9															
4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p>	Domestic waste were disposed at designated landfill located at more than 30 meters away from any nearest natural waterways.		Complied												
Criterion 4.5.4: Reduction of pollution and emission																
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p>	The estate has conducted assessment of all polluting activities during aspects and impacts analysis for all the operations and documented in the Identification of Environmental Aspect and Impact and Evaluation of Significance Form including greenhouse gas emissions, scheduled waste and solid wastes.		Complied												
4.5.4.2	<p>An action plan to reduce identified significant pollutants and</p>	The estate has established management plan for all polluting activities and documented in the Significant Pollutants and Greenhouse Gas		Complied												

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Criterion / Indicator		Assessment Findings	Compliance										
	emissions shall be established and implemented. - Major compliance -	(GHG) Emission – Reduction/Minimization Plan. The plan was reviewed on annually basis. Latest review was conducted on 3/3/2019											
Criterion 4.5.5: Natural water resources													
4.5.5.1	<p>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:</p> <ul style="list-style-type: none"> 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. 	<p>The estate has established Water Management Plan. The plan focus on 3 major parts as follows:</p> <ul style="list-style-type: none"> i. General Water Management – covers on the efficiency water usage practice. ii. Water Quality Management – to ensure the water quality is always preserved in the most cost effective ways. iii. Emergency Management – Discipline of dealing with and avoiding risk of water shortage. <p>The monitor the water consumption on monthly basis. Sighted the water consumption monitoring records FY 2018 as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Water Consumption</th> </tr> </thead> <tbody> <tr> <td>Jan 18</td> <td>1.39</td> </tr> <tr> <td>Feb 18</td> <td>2.48</td> </tr> <tr> <td>Mar 18</td> <td>2.17</td> </tr> <tr> <td>Apr 18</td> <td>1.84</td> </tr> </tbody> </table>	Month	Water Consumption	Jan 18	1.39	Feb 18	2.48	Mar 18	2.17	Apr 18	1.84	Complied
Month	Water Consumption												
Jan 18	1.39												
Feb 18	2.48												
Mar 18	2.17												
Apr 18	1.84												

Criterion / Indicator		Assessment Findings		Compliance
	- Major compliance -	May 18	1.91	
		Jun 18	2.30	
		July 18	14.09	
		Aug 18	6.20	
		Sep 18	1.92	
		Oct 18	1.53	
		Nov 18	1.37	
		Dec 18	1.15	
		Average	2.31	

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Criterion / Indicator		Assessment Findings	Compliance
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	Sighted during site visit, no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	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 -	Road side pits were also available at every 3 palm rows, to divert in event of water overflowing and also to benefit the nearest palm at the pit end to obtain additional moisture. This is part of the common practices introduced within the Group Agriculture Procedures.	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 requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. - Major compliance -	The estate has conducted HCV assessment conducted by Dr. Yap Son Kheong, S.K Yap Forestry and Landscape Advisory Services and documented in report named Inventory on HCV Sites within Genting Plantations Berhad Group of Estates – Sabah Region, July 2010. HCV sighted in the GJBE as per report: i. HCV 1.2 Threatened and Endangered Species – Proboscis Monkey and False Gharial ii. HCV 4.2 Erosion Control – portion of Blocks 51, 55 and 56 were too steep for planting v. HCV 5 Basic Needs to Local Communities.	Complied
4.5.6.2	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for	The estate has established management plan and documented Management and Monitoring Plan for HCV areas within GJBE. The plan	

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Criterion / Indicator	Assessment Findings	Compliance
<p>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>was reviewed on annually basis. Latest review was conducted on 2/5/2019.</p> <p>In the management plan stated the management action as follows:</p> <p>i. Place signage on no illegal hunting and collecting, no unauthorized entry</p> <p>ii. Patrol the boundary area</p> <p>iii. Socialize the HCV assessment which consist of identification, management and monitoring to all employee</p> <p>iv. Inform all stakeholders on the HCV assessment and monitoring during stakeholders consultation meeting.</p> <p>Sighted the implementation of the management plan as follows:</p> <p>i. HCV areas monitoring was conducted once every 2 months .Sighted the monitoring records for the month of January, March and May 2019.</p>	
<p>4.5.6.3 A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>The estate has established management plan to comply with indicator 1 and documented Management and Monitoring Plan for HCV areas within GJBE. The plan was reviewed on annually basis. Latest review was conducted on 2/5/2019</p>	<p>Complied</p>
<p>Criterion 4.5.7: Zero burning practices</p>		
<p>4.5.7.1 Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.</p> <p>- Major compliance -</p>	<p>Genting Plantations has established ASEAN Zero Burning Policy (1999) and the Environmental Quality (Declared Activities) (Open Burning) Order 2003 signed by the President and Chief Operating Officer dated</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		10/8/2011. The policy was communicated to all the employee through training, briefing and signage at several notice board in the estate.	
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 -	No controlled burning application is allowed as per Zero Burning Policy	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 -	No controlled burning application is allowed as per Zero Burning Policy	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 -	Genting Plantations has established Standard Operating Procedure land preparation for replanting and documented in Oil Palm Manual. Refer document no. OPM 1: Land Clearing, Preparation, Planting and Legume Cover Establishment under section Palm to Palm Replanting. All felled palm will be shredded or chip and piled between planting rows.	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.	The estate operations are guided by the following manuals. a) Genting Plantations Oil Palm Manual OPM issued on 9/11/99 updated June 2013.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>- Major compliance -</p>	<ul style="list-style-type: none"> - Land preparation/nursery/planting/soil conservation/ - Pest & Disease/weeding/fertiliser application/harvesting - Managing difficult soils/crop forecast <p>b) Sustainability Management Procedure Manual 1/8/13 revised in 7/2/19.</p> <p>c) OSH Manual dated 1/1/2010.</p> <p>d) Environmental Control Procedure – 01/9/2018</p> <p>e) Store Operating Manual – 2014</p> <p>f) Standard Operating Procedure Malaysia Estates rev 2 (Dec 10) rev 3 (Oct 13)</p> <p>g) Jobs description - 2012</p> <p>The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections</p> <ul style="list-style-type: none"> a) OPM No 7. Manuring of oil palm b) OPM no 13. Managing difficult soils <p>The procedures as documented in the manuals and SOPs were disseminated to the staff/workers through morning briefings and trainings. The manuals are kept in the main office for references of employees particularly for the supervisory personnel. Field inspection and interviews with the workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs. The SOPs included the operation activities from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt.</p>	
<p>4.6.1.2 Where oil palm is grown within permitted levels on sloping land,</p>	<p>The estates construct terraces at slope area of more than 6 degree. Planting of cover crop are made to retain the soil structure and</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
	<p>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>conservation. Road side pit are made to divert water at slope areas to prevent road erosion and surface damage. Terraces are constructed inclined towards the terrace wall</p>	
4.6.1.3	<p>A visual identification or reference system shall be established for each field.</p> <p>- Major compliance -</p>	<p>All fields are marked and identified. Information i.e. year planting (field no) and the total hectare is shown in all markers. There are both stenciled at the palm trees and also displayed in signage at the boundary/corners of every field. This is observed during the field visit. Block numbers were also identified in series.</p>	Complied
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p>	<p>The estate has established a business plan and documented in the Summary of Expenditure – Projection for Year 2019 to 2023. The business plan stated the Crop Projection, Mature Upkeep Cost, Manuring Cost, Harvesting Cost, transport cost, General Charges and Capital Expenditure.</p>	Complied
4.6.2.2	<p>Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years.</p> <p>- Major compliance -</p>	<p>The estate has to establish the replanting as the oldest palm was planted in 2004.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																												
4.6.2.3	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production : cost per tonne of FFB d) Price forecast e) e) Financial indicators : cost benefit, discounted cash flow, return on investment <p>- Major compliance -</p>	<p>The estate has established a business plan and documented in the Summary of Expenditure – Projection for Year 2019 to 2023. The business plan stated the Crop Projection, yield per hectare, year of planting, Mature Upkeep Cost, Manuring Cost, Harvesting Cost, transport cost, General Charges and Capital Expenditure.</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th></th> <th></th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Mature Ha</td> <td>3453.38</td> <td>3453.38</td> <td>3893.27</td> <td>3893.27</td> <td>3893.27</td> </tr> <tr> <td>2</td> <td>FFB / Mt</td> <td>71257</td> <td>78441</td> <td>87572</td> <td>96239</td> <td>102141</td> </tr> <tr> <td></td> <td>RM/Mt</td> <td>232.68</td> <td>244.01</td> <td>230.33</td> <td>220.29</td> <td>217.84</td> </tr> </tbody> </table>			2019	2020	2021	2022	2023	1	Mature Ha	3453.38	3453.38	3893.27	3893.27	3893.27	2	FFB / Mt	71257	78441	87572	96239	102141		RM/Mt	232.68	244.01	230.33	220.29	217.84	Complied
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4.6.2.4	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p> <p>- Major compliance -</p>	<p>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.</p> <ul style="list-style-type: none"> a) The management also provides variance report on the performance and reviewed on a monthly basis. b) The supervisory personnel maintained a daily cost for the field operations. c) The Regional meeting involving the Managers sits monthly with the Head Office, higher management for the performance review. 	Complied																												
Criterion 4.6.3: Transparent and fair price dealing																															
4.6.3.1	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p>- Major compliance -</p>	<p>Contract initialization and awarding is guided by Genting Plantation Bhd’s Procedural Instruction, Plantations, PLA 4, Contract Works. Based on the procedure, the contract initialization process shall be carried out by the operating unit (OU) and the contractor shall be</p>	Complied																												

Criterion / Indicator		Assessment Findings	Compliance
		<p>shortlisted at OU level. This consists of major contract works that can be clearly identified and involved substantial contract sum with the following criteria:</p> <ul style="list-style-type: none"> a) daily work carry out on a continuous basis and payment made monthly e.g.: <ul style="list-style-type: none"> - FFB harvesting - loading & transportation of FFB/EFB - transportation of CPO & PK b) contract with a specified completion period e.g. <ul style="list-style-type: none"> - new planting/replanting work - major repair/construction works (estate & mill) - jungle clearing & development work - major road works <p>The current practice found to be in line with the procedure and there has been no complaint/grievance with regards to the pricing mechanism.</p>	
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>Payments to the contractors were found to be fair, legal, transparent and timely manner in accordance to the established contract agreements. E.g. of payment verified: to Syarikat CM, payment #2400020977GSDC dated 16/4/2019, invoice # I000179 dated 31/3/2019. So far there has been no complaints with regards to payments. Further confirmation was also obtained during stakeholders consultation.</p>	Complied
Criterion 4.6.4: Contractor			

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Criterion / Indicator		Assessment Findings	Compliance
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	Jambangan Estate had informed its contractors regarding the need to adhere the MSPO requirements. Awareness was done through OHS briefing conducted on 3/5/2019. Attendance records were available for verification.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	The contractors, for e.g. FFB and compost transporters (Syarikat CM & Pengangkutan Yee Kiun) have signed the contract agreement where the requirements of MSPO to be adhered stipulated in Clause 2.3 of the agreement, dated 1/1/2019.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	Genting Jambangan has no objection to allow BSI auditors to verify the assessment through physical inspection if required.	Complied
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	Delivery of task is verified by the estate before proceed for payment. This is reported in Schedule of Work Completed (SOWC) which is signed by the management representative and the contractor. Sampled SOWC - #GJBE/01/F19040001.	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.	No development of new planting in the estate visited	N/A

Criterion / Indicator		Assessment Findings	Compliance
	- Major 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 development of new planting in the estate visited	N/A
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 development of new planting in the estate visited	N/A
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 development of new planting in the estate visited	N/A
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	No development of new planting in the estate visited	N/A

Criterion / Indicator		Assessment Findings	Compliance
	external stakeholders. - 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 development of new planting in the estate visited	N/A
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 development of new planting in the estate visited	N/A
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 development of new planting in the estate visited	N/A
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 development of new planting in the estate visited	N/A

Criterion / Indicator	Assessment Findings	Compliance
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils		
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	No development of new planting in the estate visited N/A
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 development of new planting in the estate visited N/A
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	No development of new planting in the estate visited N/A
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 development of new planting in the estate visited N/A

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 development of new planting in the estate visited	N/A
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 development of new planting in the estate visited	N/A
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 development of new planting in the estate visited	N/A
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	No development of new planting in the estate visited	N/A
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 development of new planting in the estate visited	N/A

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 development of new planting in the estate visited	N/A
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 development of new planting in the estate visited	N/A

Part 4: General principles for Palm Oil Mill.

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	Policy for the implementation of MSPO shall be established. - Major compliance -	Policy of MSPO for Genting Plantations is available in Jambongan Oil Mill dated 18 March 2014 approve by President Mr Yong Chee Kong.	Complied
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	As per Indicator 4.1.1.1 the Genting MSPO policy has emphasized on the commitment to continual improvement with the objective of improving the milling operation cover in Safety, Social and environment.	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 -	Internal Audit has been conducted on 28-29/3/2019 by personnel from Sustainability Department, Genting Plantation Office Sabah (GPOS). 3 NCR and 2 Observations were raised as a result of the audit. All of the NCRs have been closed by the lead auditor on 30/4/2019.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Internal Audit procedure is available under SMPM (sustainability management procedure manual), entitled "Sustainability Internal Audit" document no SMP-GPB-03, rev. 4, dated 25 May 2018. Among the contents covered in the procedure are audit criteria, audit schedule, audit plan, responsibility of lead auditor & auditee and audit report, which to be kept for 10 years.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	Report of Internal Audit for Genting Jambongan Mill (dated 29/3/2019) was made available for review.	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 -	<p>Management Review procedure was established accordingly, refer to Sustainability Management Procedure Manual (SMP-GPB-06), rev. 1, dated 25/5/2018. The 1st MRM for MSPO was done on 6/5/2019 participated by the estate and mill personnel under Genting Jambongan unit. Among the agenda discussed in the meeting were:</p> <ul style="list-style-type: none"> 20) Status of outstanding issues from previous meetings 21) Changes, improvement or modification of the sustainability management system (SMS) 22) Internal and external audit findings (SMS) 23) Complaints and grievance book 24) Enquiry register book 25) Stakeholder management reports/minutes 26) Risk management 27) Greenhouse value 28) Review continual improvement status & recommendations 29) Review on resource & training requirements 30) Review on sustainability policy & its objectives status 31) Review of effectiveness in achieving QEO objectives 32) Compliance status on legal & other requirements 33) Other matters 34) Preventive & corrective actions 35) Recommendations for improvement 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		36) Result of internal RSPO SCCS & MSPO SCCS audit 37) Customer feedback 38) Changes that could affect the management system	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	<p>The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.</p> <p>- Major compliance -</p>	<p>Addressed in SMPM Procedures for Continual Improvement of Sustainability Management System (RSPO/MSPO/ISCC). The Continuous Improvement Plan dated 20/4/2019 was available for verification. Among the action plans established were:</p> <ul style="list-style-type: none"> - to improve environmental aspects and impacts risk assessment and risk control - to receive and act on any environmental complaints through internal and external communication - maximising recycling and minimising waste or by-products generation - continue make full use of the biomass wastage - pollution prevention/mitigation plan drawn up based on identified wastes and pollutants - to hold regular meetings with stakeholders to further enhance the communication and feedback - efficient water consumption and good quality 	Complied

Criterion / Indicator		Assessment Findings	Compliance
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>The new information and techniques to improve practices are obtained mainly through information from suppliers and being members of associations related to palm oil industry (e.g. ISP). Among the noticeable new technique planned to be adopted by the mill is the using of Electrostatic Precipitator (ESP) to improve the smoke emission.</p>	Complied
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 adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.</p> <p>- Major compliance -</p>	<p>Genting Jambongan Palm Oil Mill is transparent and open to communicate its information on environmental, social and legal issues relevant to sustainability practice to the public, e.g. GJOM has distributed a notification to its stakeholders where the types of documents and information can be obtained by the public upon request: Among the documents can be obtained are:</p> <ul style="list-style-type: none"> • Land title • Policies • Reports (EAI, SIA, minutes of meeting, HCV report, audit reports) • Action plans (pollution prevention, continual improvement, OHS) • Procedures (complaints & grievances, negotiation & compensation, sexual harassment) <p>This is addressed in its Sustainability Management Procedure Manual, Procedures on Request and Responses [SMP-GPB-25, rev.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		00, 14/8/2014]. Means of communication is spelt out in clause 3.1.1 of the procedure e.g. meetings, telephone, walk in to office, letter, e-mail, fax, etc.	
4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance -	The management documents which are publicly available are mentioned in Indicator 4.2.1.1. Any request of information shall be recorded in "Enquiry Register Book" (ref.: Clause 3.1.2 of the above procedure). Verification of the book showed that there has been no request made of the above mentioned subjects ever since the last assessment.	Complied
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 -	Procedure is available entitled Sustainability Management Procedure Manual, Consultation and Communication [SMP-GPB-17, rev. 02, 23/2/2018].	Complied
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	All issues and grievances are handled by the manager of the operating unit. If the issue be beyond the manager jurisdiction, it shall be forwarded to the Head Office. This is addressed in Clause 3.9 of the procedure.	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance -	The list of stakeholders was last updated in 15/4/2019 which consists of government agency, suppliers/contractors, FFB suppliers and surrounding communities. There have been two meetings with the stakeholders i.e. on 15/10/2018 (external stakeholders – government agencies) and 13/4/2019 (external stakeholders). Minutes of meetings were available for verification.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance -	The traceability implementation is addressed in a procedure, SMPM, Supply Chain and Traceability (Mill) [SMP-GPB-23, rev. 7, 24/8/2018].	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Inspection on compliance with the traceability procedure is regularly checked through supply chain internal audit. The internal audit report dated 16/4/2019, which was carried out together with other schemes such as RSPO, was available for verification. There were 4 NCRs raised as a result of the audit.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	The Mill Manager is the person assigned to implement and maintain the traceability system.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel are maintained in various forms such as: <ul style="list-style-type: none"> • FFB Delivery Note • Mass Balance Worksheet – daily input • DGRA/Weighbridge tickets and relevant LintraMax records • Local Sales Delivery Advice (LSDA) • Incoming FFB Records • Outgoing CPO Records • Outgoing PK Records 	Complied

Criterion / Indicator	Assessment Findings	Compliance	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>GJPOM had continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Mill had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were:</p> <p>Competent Person:</p> <ul style="list-style-type: none"> i. Engine Driver Grade 1, Certificate no. SB/14/EIP/01/9 ii. Authorized Entrant and Standby Person for Confined Space, Certificate no. <ul style="list-style-type: none"> a. NW-NSDK-AE-R-0256-O b. NW-AE-0001-P iii. Boilerman Grade 2, Certificate no. SB/18/EIS/02/00072. The mill is required to hire Boilerman Grade 1 by the DOSH as written the visit report dated 5/3/2019. iv. "Penjaga Jentera" category AO. Certificate no. PJ 1130272. The mill required "Penjaga Jentera" category A4 as the mill with Overhead Transmission and Power Generation. <p>The assessment done by the mill management for ensuring compliance was not captured the non-compliance as follows: -</p>	<p>Minor NC</p>

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Criterion / Indicator		Assessment Findings	Compliance
		<p>i. Current boilerman competency at the mill is Boilerman Grade 2, Certificate no. SB/18/EIS/02/00072. The mill is required to hire Boilerman Grade 1 by the DOSH as written the visit report dated 5/3/2019.</p> <p>ii. Current electrical charginan competency is category AO. Certificate no. PJ 1130272 was not complied with the act.</p> <p>iii. No visiting engineer at Genting Jambangan Mill</p> <p>iv. There is no evidence that the weekly line-site inspection has been conducted. Based on weekly line-site record, it was only conducted once in March 2019.</p> <p>Thus, a non-conformity report was assigned due to this lapse.</p>	
4.3.1.2	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>The relevant laws were listed in Legal Requirement Register (LRR) [SMP-GPB-22, rev. 7 dated 19 April 2019]. Among the laws covered in the list were EQA, Employment Act, OSHA, FMA to name a few. The amendment/update of the list is done by Systems, Methods, Insurance and Risk Management Department (based in KL).</p>	Complied
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>Among the newly registered laws were:</p> <ul style="list-style-type: none"> - Minimum Wage Order (from 2016 to 2018) - Employment (restriction) Act 1968 (from 2006 to 2017) - Drainage and irrigation ordinance, 1956 (Sabah No. 15 1956) - Sabah water resources enactment 2002 (Sabah) Amendment – 31/12/2004 - Environmental Impact Assessment (order 2005) - Wildlife conservation Enactment 1997 - Forest Enactment 1968 (Sabah) 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Employment Insurance System Act 2017 - Sabah Labour Ordinance Cap 67, 1950 - EQ (Clean Air) Regulations (from 1978 to 2014) - Employees Social Security (Exemption No. 2) Notification 2018 	
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>A mechanism for tracking changes in law is guided by SMPM Procedures on Regional, National and International Laws [SMP-GPB-21, rev. 1, 14/4/2014]. Generally the mechanism is by monitoring or consultation with various sources (e.g. government agencies, electronic & non-electronic media, legal firms, professional bodies, industry association/organization and NGO). The Genting’s Systems, Methods, Insurance and Risk Management Department (based in KL) is the person responsible to handle the task.</p>	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>The Genting Jambongan POM is located within Genting Jambongan Estate land title. The POM occupies around 5.1 ha of the total area. Any issues related to land rights will be handled by the estate management.</p>	Complied
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.</p> <p>- Major compliance -</p>	<p>The Genting Jambongan POM is located within Genting Jambongan Estate land title. The POM occupies around 5.1 ha of the total area. Any issues related to land rights will be handled by the estate management.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The mill is separated through fencing around the vicinity. The mill is located within the host estate belonging to the same parent company and of same certification unit.	Complied
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	NA. Any issues related to land rights will be handled by the estate management.	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	NA. Any issues related to land rights will be handled by the estate management.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	NA. Any issues related to land rights will be handled by the estate management.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	NA. Any issues related to land rights will be handled by the estate management.	Complied
4.4 Principle 4: Social responsibility, health, safety and employment condition			

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.4.1: Social Impact Assessment (SIA)			
<p>4.4.1.1</p>	<p>Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.</p> <p>- Minor compliance -</p>	<p>The Social assessment for Genting Jambongan Oil Mill (GJOM) was conducted internally by the Sustainability Department. The last SIA was conducted in 31/3/2019. The assessment also incorporated the inputs obtained during the initial SEIA in October 2014. Among the groups consulted were</p> <ul style="list-style-type: none"> - local workers - foreign workers - workers representative - old, young and middle aged workers/residence - contractors & suppliers - villagers (e.g. Kg Limau-limau, Kg Malalin, Kg Hujung, Kg Bahanan) - smallholders - shop. school, etc. - government officers (e.g. Auxiliary Police, SK Jambongan, Pegawai Anak Negeri, Energy Commission, DOSH) <p>Key areas identified in the SIA were on economic livelihood/quality of life, environment, health & wellbeing, and community, families & individuals. Both positive and negative impacts were identified in the SIA.</p> <p>The recommendation from the SIA report was transferred to action plan. The action plan identified the issues & strategies, action plan,</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		responsible person and time frame for both positive and negative impact.	
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 -	System for dealing with complaints and grievances is spelt out in Sustainability Management Procedure Manual, Complaints and Grievances [SMP-GPB-19, rev. 3, 21/3/2018].	Complied
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	The system was found to be effective in managing complaints. Based on records in the "Complaints/Grievances Record Book", there were 33 complaints registered which mostly were visit inputs from DOSH & DOE. The issues were found to be well addressed and recorded by the mill.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	Complaint forms were available in Complaints/Grievances Record Book. The format includes the information such as name of complainant, passport/NRIC, phone no., address, issue, date of complaint, details of action taken, verification by manager and acknowledgement by complainant.	Complied
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -	Employees and surrounding communities were made aware of the mechanism of handling complaints through stakeholders meeting, policy training and morning briefing. This was recorded in the following records: - ISCC, RSPO & MSPO briefing on 27/4/2019, attended by 29 persons	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		- Stakeholders consultations meeting (e.g. conducted on 13/4/2019, where explanation about the flowchart procedure of complaints/grievances mechanism was recorded in the minutes)	
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	Records of complaints were maintained in the Complaints/Grievances Record Book and records for the past 24 months were still available.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance -	Contributions to local development by the mill is incorporated with Jambongan Estate.	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. - Major compliance -	Genting SDC has established the Safety and Health Policy signed by President & Chief Operating Officer dated 1/7/2018. In the policy stated the commitment of the group to provide and ensure safe work environment to all the workers and other party involved in the company activities. The policy was communicated through morning briefing, training and displayed at notice board at designated place in the mill.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.4.2</p>	<p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; 	<p>Minor NC</p>

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Criterion / Indicator	Assessment Findings	Compliance
<p>ii. All precautions attached to products should be properly observed and applied;</p> <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>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 Labelling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p>	<p>i. Raw water treatment training dated 18/3/2019</p> <p>ii. Chemical handling and storage for laboratory training dated 16/3/2019</p> <p>iii. HIRARC for laboratory dated 9/3/2019</p> <p>The mill provided appropriate PPE to all workers according to the job type. The PPE given as per HIRARC and Safe Operating Procedure. PPE issuance recodes was maintained and available to review.</p> <p>The management has established SOP for handling chemical and documented in the System Procedure: Chemical Management. Refer document no. SP-MGR-08 dated 1/8/2017.</p> <p>Genting SDC appointed the Mill Manager as the person responsible for workers safety and health. The mill management has established Safety and Health committee Mill management consist representatives from Employer and representatives from Employee as per appointment letter by the Mill Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting</p>	

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Criterion / Indicator	Assessment Findings	Compliance
<p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>The management conducted OSH committee meeting on quarterly basis. In the meeting discussed issue on employees' safety, health and welfare such as mill workplace audit report, accident review, first aid kit and firefighting equipment, ESH objective and target, grievances from external stakeholder and other matters.</p> <p>Sighted the minutes meeting for OSH committee dated 10/8/2018, 12/11/2018 and 4/2/2019.</p> <p>Genting SDC has established accident and emergency procedure and documented in System Procedure: Emergency Response Procedure. Refer document no. SP-MGR-04 dated 1/8/2017. Interview with the workers shows the understanding regarding accident and emergency procedures in the mill.</p> <p>The management has appointed the engine driver as competent first aider. The engine driver has conducted in house training for first aider for various work station at the mill. The first aider responsible for first aid box at each workstation. Sighted the latest training records for first aider dated 24/7/2018.</p> <p>Interview with workshop fitter and sterilizer attendant shows the understanding and awareness of the used and location of the first aid kit.</p> <p>The mill monitored and kept record for all accident cases and recorded in the Accident Statistic Report which submitted to the Group Safety Officer on monthly basis.</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		The accident occurred was reviewed on quarterly basis during OSH committee meeting.	
Criterion 4.4.5: Employment conditions			
4.4.5.1	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees. - Major compliance -	Covered under Genting Plantations' Social Policy (Incorporating the Labour and Human Rights requirements), dated 22/6/2015, signed by Mr. Yong Chee Kong (President and Chief Operating Officer). Various methods of communication implemented by the estate to communicate the policy to its employees such as display on notice boards, briefing and training.	Complied
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	Based on interview with employees from different backgrounds, there is no evidence that the management engage in or support any discriminatory practices. The commitment to no discrimination is also stated in the company's social policy.	Complied
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	Based on sampled workers (employment no.: E00096, E00093, E00109, E00097, E00111, E00116, E00001, E00048, E00121, E00002) pay slips for Aug & Dec 2018 and Apr 2019, it was found that the employer has met the pay and conditions as per agreed in the employment contract agreement.	Complied
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the	There was no contract workers hired in the mill.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	employment contract agreed between the contractor and his employee. - Minor compliance -		
4.4.5.5	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	Employee data base is kept and maintained in the computer system (LyntraMax). All the required information by this standard was available in the data based.	Complied
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records. - Major compliance -	Employment contracts (Perjanjian Pekerjaan, version 1/12/2017) were available in language that understood by the workers. The contract has the details about the payments and employment conditions such as period of working, working hour, medical assistance, housing, holiday, annual leave, period of notice to terminate the contract, etc.	Complied
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	Time recording system is using punch card and made transparent for both employers and employees. A few samples of punch cards record were verified against pay slips. It was found that the recordings were accurate. Based on payslip and working time records, the overtime paid for the workers were found to be complied with the legal regulations.	Complied
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective	Working hours and breaks were found to be in line with the legal requirement. Except for engine driver, there is only 1 working shift	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p>- Major compliance -</p>	<p>i.e. 0900 to 1700 hour and a flexible half an hour to an hour break in between is given.</p>	
<p>4.4.5.9 Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p>	<p>Based on sampled pay slips as mentioned in 4.4.5.3, it was found that the wages and overtime payment were in line with the employment contract.</p>	<p>Complied</p>
<p>4.4.5.10 Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.</p> <p>- Minor compliance -</p>	<p>Other benefits such as performance bonus was provided by the employer and verifiable in the pay slips. The establishment of estate clinic also provides the medical care for the mill workers and their dependents.</p>	<p>Complied</p>
<p>4.4.5.11 In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p> <p>- Major compliance -</p>	<p>The workers quarters was found to be habitable and in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446). Treated potable water and electricity were provided to the housing for free of charge.</p>	<p>Complied</p>
<p>4.4.5.12 The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>Sexual Harassment Policy has been established dated 3/8/2009 and signed by the Chief Operating Officer. The awareness of this policy among the workers was made through displaying of the policy at notice boards and briefing by the field staff. Apart from that it was also communicated through Policies briefing (on 27/4/2019). Handling of sexual and violence is guided by SMPM "Procedure On Prevention and Eradication of Sexual Harassment at The</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		Workplace". As the point of this assessment, there has been no report related to sexual harassment or violence.	
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	There is no trade union members in the mill. Nonetheless, there is also no restriction for them to join any trade union. This is recognized by the employer through establishment of people Policy dated 3/8/2009.	Complied
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. - Major compliance -	Based on employees list, no children and young persons were recruited. The list was extracted from LintraMax system and has the information about date of birth and date of join.	Complied
Criterion 4.4.6: Training and competency			
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance -	The mill has established training program for all the employee and documented in ESH training plan. The training plan covers the mill operation, safety and health, policies, Environmental Aspects and Impacts, Environmental control procedure and etc. Sighted the training records as follows: i. Monitoring and measurement training dated 13/10/2018 ii. Chemical Management training dated 21/9/2018	Complied

Criterion / Indicator		Assessment Findings	Compliance
		iii. Communication/operational control dated 8/8/2018 iv. Safety briefing for electronic equipment dated 18/6/2018 v. Legal and other requirement training dated 23/4/2019	
4.4.6.2	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. - Major compliance -	The mill has conducted the training need analysis and documented in the ESH Training Plan. The analysis consist of proposed person to attend, employee designation, intended scope of training and rationale of training planned. 18 in house training and 2 external training was identified during the analysis.	Complied
4.4.6.3	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure. - Minor compliance -	The mill continuously provided the training to the workers as per plan. The training plan was reviewed on annually basis base on the training need analysis conducted.	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	Genting SDC has established Environmental Policy signed by the Chief Operating Officer dated 5/1/2009. In the policy stated the company commitment to ensure all operation are conducted in environmentally-responsible and sustainable manner.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.1.2 The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations - Major compliance -</p>	<p>The mill has conducted the environmental aspects and impacts analysis and documented in Environmental Aspects and Impacts Register. Refer document no. SP-MGR-02-F01-1.</p> <p>Base on the environmental aspects and impacts analysis conducted, the mill has established Environmental Improvement and Management Plan. The plan stated the source of pollution, impacts, improvement/mitigation plan, data required, monitoring and action plan, person responsible and timeline.</p> <p>Both documents was reviewed on annually basis. Latest review was conducted on 20/4/2019.</p>	<p>Complied</p>
<p>4.5.1.3 An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -</p>	<p>Base on the environmental aspects and impacts analysis conducted, the mill has established Environmental Improvement and Management Plan.</p> <p>Both documents was reviewed on annually basis. Latest review was conducted on 20/4/2019.</p> <p>Sighted the implementation of the management plans as follows:</p> <ul style="list-style-type: none"> i. Installation of ESP – the mill has budgeted for capital expenditure for 1 lot of Air Advance Treatment System and 1 lot Sensor for Dust Monitoring system in the 2019 budget. ii. Boundary noise exposure monitoring Report no.: RSSB/BOUNDARYNOISE/17-015 Result: Average noise levels monitored during day and night time for all monitoring points were below guideline limits 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	The program to promote positive impacts activities to the environment has been included in the Continuous Improvement Plan as follows: i. Maximizing recycling and minimizing waste or by-products generation. ii. Continue make full use of biomass wastage. The plan was reviewed on annually basis. Latest review was conducted on 22/4/2019.	Complied
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - Major compliance -	The mill has established training program for all the employee and documented in ESH training plan. The training plan covers, Environmental Aspects and Impacts, Environmental control procedure and etc.	Complied
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	The management has established Environmental Performance Monitoring Committee. The meeting was conducted on quarterly basis.	Complied
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel,	The monitoring of non-renewable energy usage was conducted on monthly basis. Average diesel usage FY 2018 recorded at 7.07 ton/FFB processed.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	electricity in the operations over the base period - Major compliance -	The management plan to optimize the usage of non-renewable energy usage has been established and documented in the Environmental Improvement and Management Plan.	
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets.	Complied
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	The fibre and shell are used in the boiler for fuel recycled in the process system.	Complied
Criterion 4.5.3: Waste management and disposal			
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	The mill had identified all waste products and its source of pollution and documented in Identification, segregation and Storage of Waste. The identification was group base on the pollution source as follows: i. Workshop and mechanic area – Filters, lubricants, battery, rags, gloves, tyres, oxygen and acetylene, scrap iron ii. Vehicle used spare part store – Hydraulic hose, cylinders, dismantled equipment iii. Office and weighbridge – domestic, recyclable paper, PC and printer cartridges	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		iv. Diesel Tank – Scheduled Waste v. Chemical Store – Containers, boxes	
4.5.3.2	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p>- Major compliance -</p>	<p>The mill has established the waste management plan base on the waste identification conducted and reviewed on annually basis.</p> <p>The plan stated the source of pollution, management plan, monitoring and action plan, data required and person in charge.</p> <p>Sighted the Scheduled Waste disposal records as follows:</p> <p>i. 16/2/2019, SW 410, C/N no. 2019021811RB68KE ii. 16/2/2019, SW 409, C/N no. 2019021811SKLM51 iii. 16/2/2019, SW 305, C/N no. 2019021810QF4A1T</p>	Complied
4.5.3.3	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p>- Major compliance -</p>	<p>Genting SDC has established the SOP for handling of used chemicals and documented in System Procedure: Scheduled Waste. Refer document no. SP-MGR-09 dated 1/8/2017.</p>	Complied
4.5.3.4	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p>- Minor compliance -</p>	<p>Domestic waste collection was done 3 times per week by Genting Jambangan Estate and disposed at designated landfill.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance								
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, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	The mill has conducted assessment of all polluting activities in the Environmental Aspect Impact and Environmental Impact Evaluation. A management plan has been established based on the significant aspect and DOE license compliance schedule and documented in Environmental Improvement and Management Plan.	Complied								
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Management plan has been established based on the significant aspect and DOE license compliance schedule and documented in Significant Pollutants and Greenhouse Gas (GHG) Emission – Reduction/minimization Plan. The plan latest review was conducted on 20/4/2019.	Complied								
4.5.4.3	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations. - Major compliance -	<p>Effluent generated were disposed through compost processed and were not permitted to discharge into any water course as prescribed under "Jadual Pematuhan" no. 004843.</p> <p>Regular monitoring was done on monthly basis and every quarterly via "Borang Penyata Suku Tahun" to DOE for compliance.</p> <p>Noted the following 4th quarter 2018 and 1st quarter 2019 report :-</p> <table border="1"> <thead> <tr> <th>4th quarter 2018</th> <th>Month</th> <th>Parameter</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td></td> <td>Oct 18</td> <td>BOD</td> <td>16800</td> </tr> </tbody> </table>	4 th quarter 2018	Month	Parameter	Results		Oct 18	BOD	16800	
4 th quarter 2018	Month	Parameter	Results								
	Oct 18	BOD	16800								

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Criterion / Indicator		Assessment Findings			Compliance
			pH	8.20	
			S. Solid	2250	
		Nov 18	BOD	12850	
			pH	7.40	
			S. Solid	4600	
		Dec 18	BOD	21300	
			pH	6.80	
			S. Solid	1300	
		1 st quarter 2019			
		Month	Parameter	Results	
		Jan 19	BOD	20600	
			pH	5.30	
			S. Solid	9800	
		Feb 19	BOD	10500	
			pH	6.60	
			S. Solid	2700	
		Mar 19	BOD	20450	

Criterion / Indicator		Assessment Findings			Compliance
			pH	6.10	
			S. Solid	51000	
Criterion 4.5.5: Natural water resources					
4.5.5.1	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>The mill has established water management plan and documented in Water Management Plan for Raw Water and Drinking Water. The objectives of the management plan is to:</p> <p>Raw Water Treatment</p> <ul style="list-style-type: none"> i. To precipitate the flocs in the water and allow them to settle down at the bottom of the clarifier tank, ii. To remove any impurities such as iron/magnesium content and suspended solids. <p>Drinking water plant</p> <ul style="list-style-type: none"> i. To provide and supply clean and safe water drinking purpose at all resident area. <p>Sighted the implementation of the management plan as follows:</p> <p>Drinking water analysis:</p> <ul style="list-style-type: none"> i. Report no.: GJOM/DYK/19/03/001 <p>Date report: 4/5/2019</p>			Complied

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Criterion / Indicator	Assessment Findings	Compliance																		
	<p>Result: Conform with National Standard for Drinking Water</p> <p>i. Report no.: GJOM/DYK/18/10/002</p> <p>Date report: 5/12/2018</p> <p>Result: Conform with National Standard for Drinking Water</p> <p>The monitor the water consumption on monthly basis. Sighted the water consumption monitoring records FY 2018 as follows:</p> <table border="1" data-bbox="1088 722 1552 1345"> <thead> <tr> <th>Month</th> <th>Water Consumption</th> </tr> </thead> <tbody> <tr> <td>Jan 18</td> <td>1.39</td> </tr> <tr> <td>Feb 18</td> <td>2.48</td> </tr> <tr> <td>Mar 18</td> <td>2.17</td> </tr> <tr> <td>Apr 18</td> <td>1.84</td> </tr> <tr> <td>May 18</td> <td>1.91</td> </tr> <tr> <td>Jun 18</td> <td>2.30</td> </tr> <tr> <td>July 18</td> <td>14.09</td> </tr> <tr> <td>Aug 18</td> <td>6.20</td> </tr> </tbody> </table>	Month	Water Consumption	Jan 18	1.39	Feb 18	2.48	Mar 18	2.17	Apr 18	1.84	May 18	1.91	Jun 18	2.30	July 18	14.09	Aug 18	6.20	
Month	Water Consumption																			
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Apr 18	1.84																			
May 18	1.91																			
Jun 18	2.30																			
July 18	14.09																			
Aug 18	6.20																			

Criterion / Indicator		Assessment Findings		Compliance
		Sep 18	1.92	
		Oct 18	1.53	
		Nov 18	1.37	
		Dec 18	1.15	
		Average	2.31	
4.5.5.2	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations. - Major compliance -	Effluent generated were disposed through compost processed and were not permitted to discharge into any water course as prescribed under "Jadual Pematuhan" no. 004843. Regular monitoring was done on monthly basis and every quarterly via "Borang Penyata Suku Tahun" to DOE for compliance.		Complied
4.6 Principle 6: Best Practices				
Criterion 4.6.1: Mill Management				
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	The SOP for the estates and mill operations are available which is prepared on Group basis. There are levels/types of the documentation identified as follows; c) Quality, Environmental, Safety & Health & Sustainability Manual – 01/7/17		Complied

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Criterion / Indicator		Assessment Findings	Compliance
		d) System Procedure – 01/1/2012 e) Procedure Manual – 02/1/2018 f) SOM Standard Operating Manual – 2013 g) Safe Operating Procedure – 01/1/2011 h) Environmental Control Procedure – 01/9/2018 The mill operations are supervised by the staff, Engineers of the Mill. In addition there are visit from the SVP and mill management team. Also from the supporting units .i.e. OSH, Sustainability Department. Compliance and performance are discussed monthly with reports submitted to the Head Office	
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	The monitoring of the mill process is made through the shift supervision headed by An Engineer/Executives. All process parameters are documented and summarized in a daily report. The external monitoring is made through visits i.e. SVP and the mill management team. In addition there are audits by OSH, Sustainability and Financial Audits. This is to ensure compliance to Policies, procedures in relation mill operations, financial, OSH, welfare among others being adhered.	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 Mill budget component comprises of the following; a) FFB processed / CPO/CPK production b) General Charges - Supervision/Office & admin expenses - Indirect labour c) Processing	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		d) Despatch The business plan comprises established for horizon 2019-2022. a) Crop intake. b) Processing cost RM/mt c) Extraction rates. d) CAPITAL expenditures.	
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 -	Contract initialization and awarding is guided by Genting Plantation Bhd's Procedural Instruction, Plantations, PLA 4, Contract Works. Based on the procedure, the contract initialization process shall be carried out by the operating unit (OU) and the contractor shall be shortlisted at OU level. This consists of major contract works that can be clearly identified and involved substantial contract sum with the following criteria: c) daily work carry out on a continuous basis and payment made monthly e.g.: - FFB harvesting - loading & transportation of FFB/EFB - transportation of CPO & PK d) contract with a specified completion period e.g. - new planting/replanting work - major repair/construction works (estate & mill) - jungle clearing & development work - major road works	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>The current practice found to be in line with the procedure and there has been no complaint/grievance with regards to the pricing mechanism.</p> <p>Pricing mechanisms for the products and other services were clearly written in the contract and purchase order. For CPO and PK transporter, fees of services is mentioned under Third Schedule under the contract agreement. For supplier, specific terms and conditions are mentioned under notes and conditions on the transport and payment documentation. For FFB supplier, price will be updated based on monthly average price of the previous month. Payment will refer end month average closing price for example October 2017. Payments are processed and made by HQ through system named LintraMax This is made upon job verification by the mill personnel.</p>	
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>Payments to the contractors were found to be fair, legal, transparent and timely manner in accordance to the established contract agreements. So far there has been no complaints with regards to payments. Further confirmation was also obtained during stakeholders consultation.</p>	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	<p>In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p>	<p>Genting Jambongan POM had informed its contractors regarding the need to adhere the MSPO requirements. Awareness briefing was done through the stakeholders meeting which include contractors on the MSPO requirements.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	The contractors, for e.g. CPO & PK transporters (Hai Heng Enterprise Sdn Bhd – providing carrier to transport CPO & PK) have signed the contract agreement where the requirements of MSPO to be adhered stipulated in Clause 38 of the agreement, dated 1/5/2018. Apart from that, there is also a memorandum dated 30/1/2019 from the Sr. VP-Processing (Malaysia) to add addendum for the agreement where the requirements of RSPO, ISCC, MSPO & OSH are included.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	The requirement of accepting MSPO accredited auditors to audit against the contractors are being stated in Clause 6 of the memorandum mentioned in 4.6.4.2 above.	Complied

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 Jambongan Oil Mill and Supply Base Certification Unit complies with the MS 2530-3:2013 or MS 2530-4:2013. It is recommended that the certification of Genting Jambongan Oil Mill and Supply Base Certification Unit is approved and/or continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Arunan Kandasamy	Name: Muhammad Fadzli Masran
Company name: Genting Plantations Berhad	Company name: BSI Services Malaysia Sdn. Bhd.
Title: Senior Vice President-Plantation	Title: Client Manager
Signature:  Date: 1/8/19	Signature:  Date: 11/7/2019
	

Appendix A: Assessment Plan

PRELIMINARY AGENDA				
Date	Time	Subjects	MFM	VS
Wednesday 15/5/19 Jambongan Oil Mill	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 – 11.00	Jambongan POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√
	11.00 – 12.30	Document review (MSPO part 4), 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 P4: Social responsibility, health safety and employment condition, P6 : Best practices	√	√
	12.30 – 13.30	Lunch/Rest	√	√
	13.30 – 16.30	Continue with document review (MSPO part 4), 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 P4: Social responsibility, health safety and employment condition, P6 : Best practices	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√
Thursday 16/05/2019 Jambongan Estate	09.00 – 11.00	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.	√	√
	11.00 – 12.30	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)		

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	12.30 – 13.30	Lunch / Rest	√	√
	13.30 – 16.00	Continue 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)	√	√
	16.30 - 17.00	Interim Closing.	√	√
Friday 17/5/19 Jambongan Estate	08:00-08:30	Verify any outstanding issues & Preparation for closing Meeting	√	√
	08:30-09:30	Closing Meeting	√	√
	PM	Audit team traveling back to Sandakan	√	√
Saturday 18/5/2019	AM	Audit team travel back to KL via AK5199, ETD 09:20 (SDK) – 12:05 (KUL) (Air Asia)	√	√

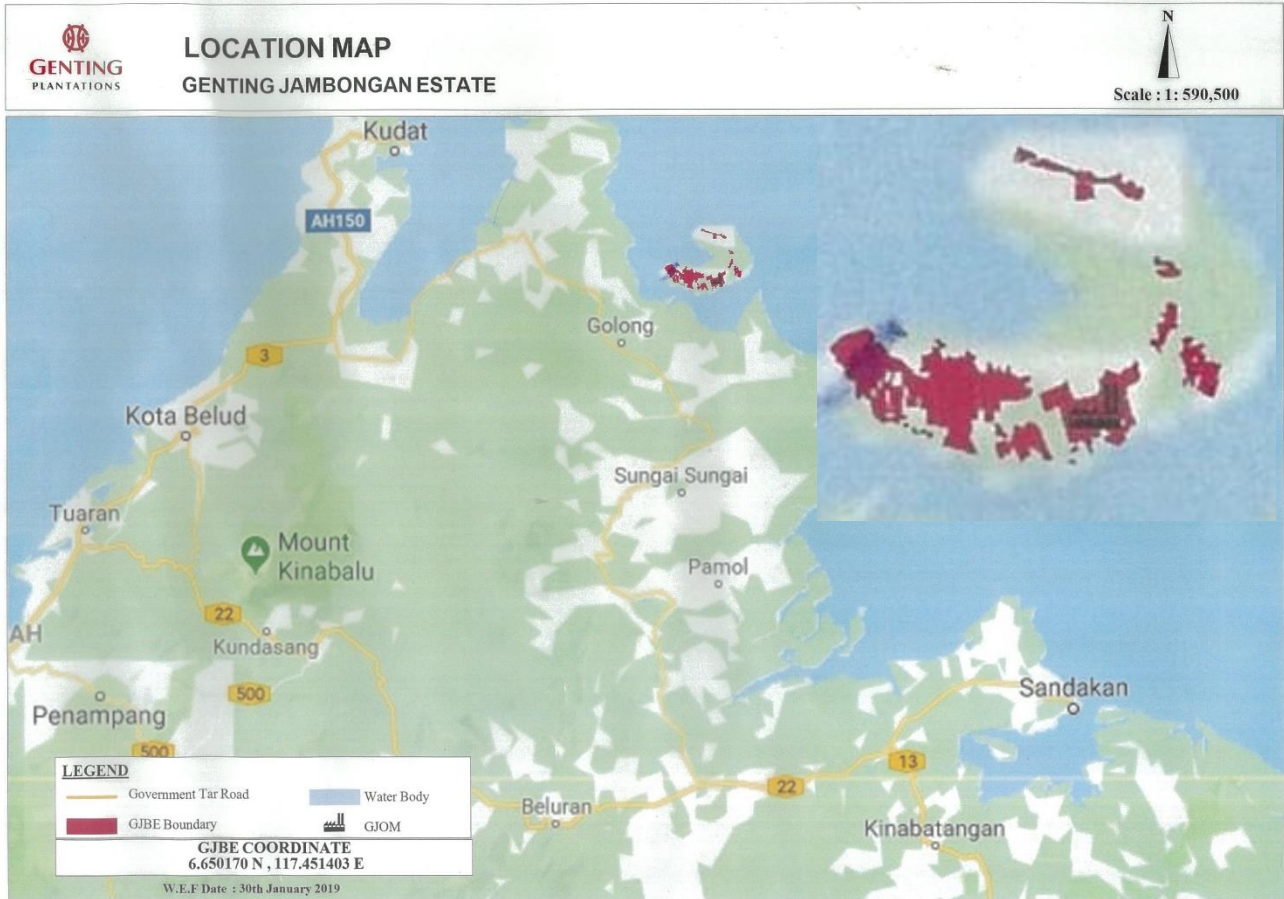
Appendix B: List of Stakeholders Contacted

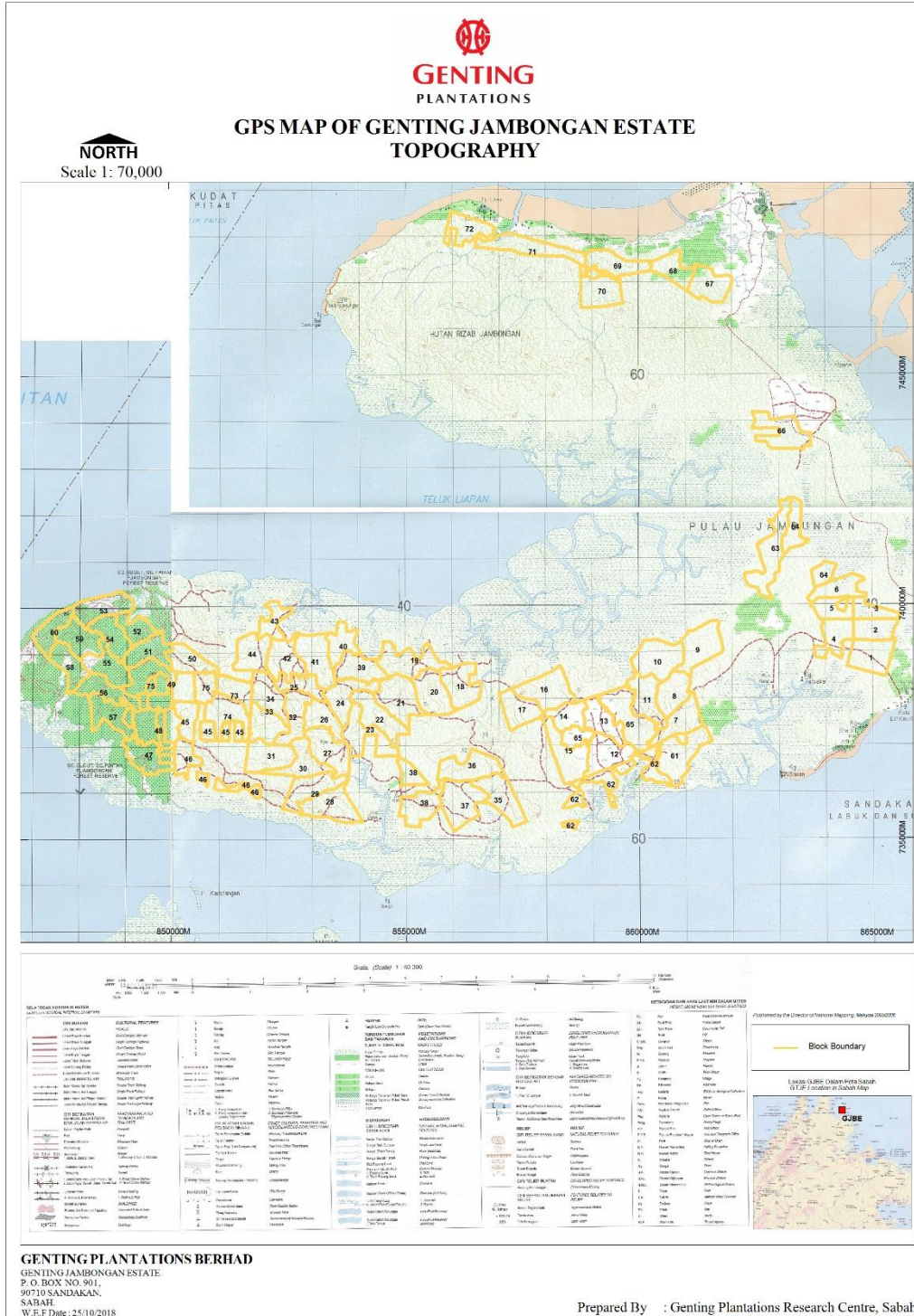
List of Stakeholders Contacted	
<p>Internal Stakeholders</p> <p>Estate managers Mill engineer Supervisors, Staff & Clerks Mill local & foreign workers (process, workshop, etc.) Estate local & foreign workers (harvesters, sprayers, etc.) Local workers representatives Foreign workers representatives Gender committee representative Estate Hospital Assistant</p>	<p>Union/Contractors/Local Communities</p> <p>Kantin GJOM Shop GJE Pengangkutan Yee Kiun Harimaju Sdn. Bhd</p>
<p>Government Departments</p> <p>Army (Kem Sri Jambongan) Klinik Kesihatan Jambongan S.K Jambongan</p>	<p>NGO</p>

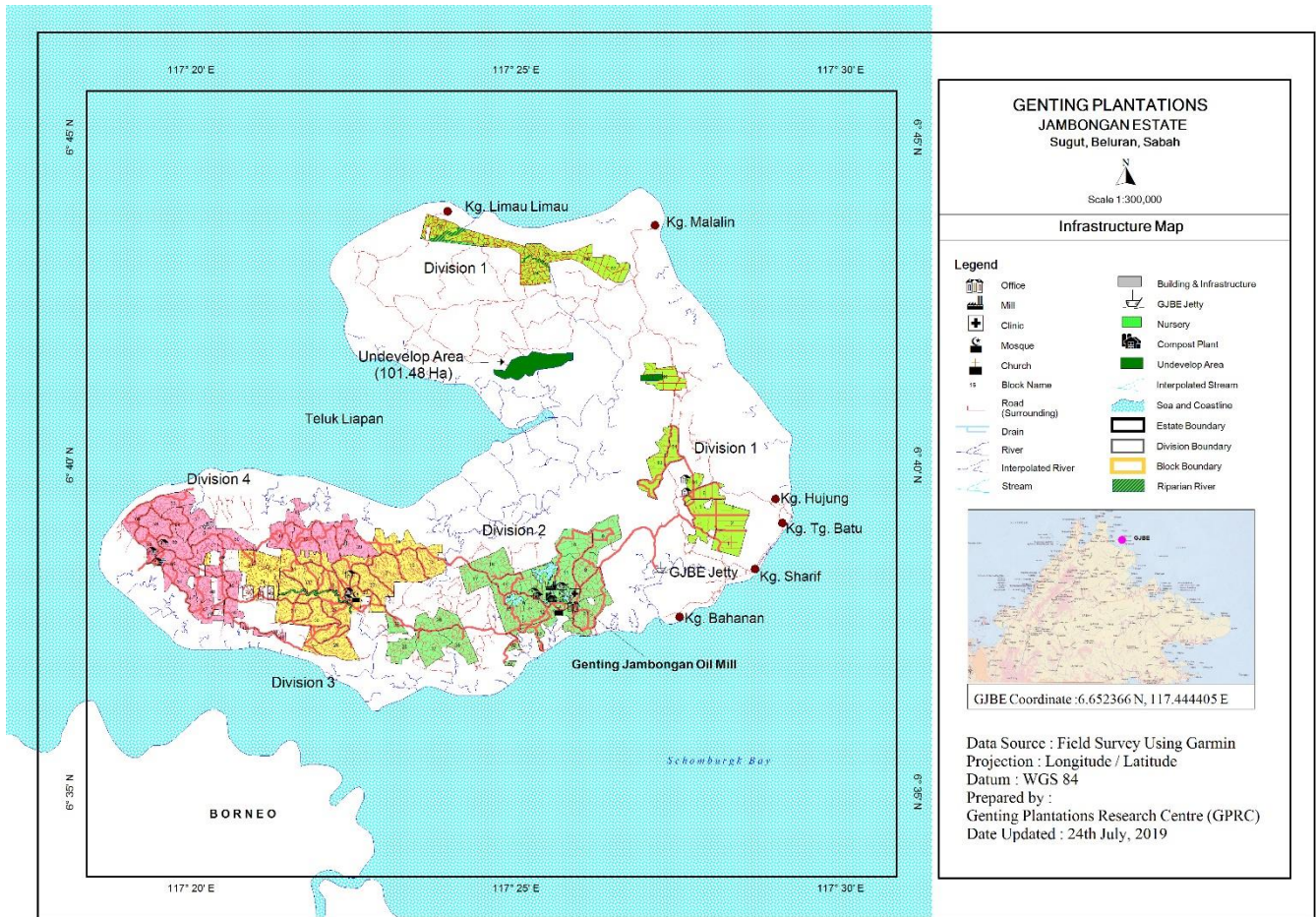
Appendix C: Smallholder Member Details

No	Name of smallholder	Year Planted	Land Area (ha)	Forecast FFB (Mt/ha/year)
1	N/A			
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
TOTAL				

Appendix F: Location and Field Map







Appendix G: List of Abbreviations

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
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