

**MALAYSIAN SUSTAINABLE PALM OIL
RECERTIFICATION 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 Sabapalm Oil Mill Location of Certification Unit: KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia

Report prepared by:
Muhammad Fadzli (Lead Auditor)

Report Number: 9673579

Assessment Conducted by:
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TABLE of CONTENTS

Page No

Section 1: Executive Summary	3
1.1 Organizational Information and Contact Person	3
1.2 Certification Information.....	3
1.3 Location of Certification Unit.....	4
1.4 Plantings & Cycle.....	4
1.5 FFB Production (Actual) and Projected (tonnage).....	4
1.6 Certified CPO / PK Tonnage	5
1.7 Certified Area	5
1.8 Details of Certification Assessment Scope and Certification Recommendation:.....	5
Section 2: Assessment Process	6
1. Assessment Program.....	7
Section 3: Assessment Findings	8
3.1 Details of audit results.....	8
3.2 Details of Nonconformities and Opportunity for improvement.....	8
3.3 Status of Nonconformities Previously Identified and OFI	13
3.4 Issues Raised by Stakeholders	17
3.5 Summary of the Nonconformities and Status.....	18
3.6 Summary of the findings by Principles and Criteria	19
Section 4: Assessment Conclusion and Recommendation	123
Appendix A: Assessment Plan.....	125
Appendix B: List of Stakeholders Contacted	126
Appendix C: Smallholder Member Details.....	127
Appendix F: Location and Field Map.....	128
Appendix G: List of Abbreviations	130

Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
MPOB License	Mill: 500002804000 Estate: 523495002000		
Company Name	Genting Plantations Berhad		
Address	Genting Sabapalm Oil Mill, KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia		
Group name if applicable:	NA		
Subsidiary of (if applicable)	NA		
Contact Person Name	Yee Chee Fui		
Website	www.gentingplantations.com	E-mail	cheefui.yee@genting.com
Telephone	089265921 / 0194904049	Facsimile	

1.2 Certification Information			
Certificate Number	Mill - MSPO 689067 Estate - MSPO 689068		
Issue Date	04/07/2019	Expiry date	03/07/2024
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Stage 1 Date	N/A - The site is RSPO Certified		
Stage 2 / Initial Assessment Visit Date (IAV)	14 - 15/4/2016		
Continuous Assessment Visit Date (CAV) 1	19 - 20/4/2017		
Continuous Assessment Visit Date (CAV) 2	16 - 17/4/2018		
Continuous Assessment Visit Date (CAV) 3	N/A		
Continuous Assessment Visit Date (CAV) 4	N/A		
Recertification Assessment Visit Date (RAV)	13 - 15/3/2019		
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 653477	RSPO Principle and Criteria for sustainable palm oil production:2013; Malaysian National Interpretation:2014; RSPO Supply Chain Certification June 2017 for CPO Mill (Module E: Mass Balance)	BSI Services (M) Sdn Bhd	08/06/2021

MSPO Public Summary Report
Revision 0 (Aug 2017)

EU-ISCC-Cert-DE119-60193799	ISCC EU	13.01.2019	12/01/2020
MSPO 689067 MSPO 689068	MS 2530-3:2013 MSPO Part 3 General principle for oil palm plantation. MS 2530-4: 2013 MSPO Part4 General principle for palm oil mills.	BSI Services (M) Sdn Bhd	03/07/2019
MPOB/Cop/MF/0 024-2	Code of Good Milling Practice for Palm Oil Mills	MPOB	20/12/2020
AR 5768-ISO 9001:2008	QMS	SIRIM QAS International Sdn Bhd	24/02/2020
ER 0741 – ISO 14001:2004	EMS	SIRIM QAS International Sdn Bhd	24/02/2020
SR 0590 – OHSAS 18001:2007	OHSAS	SIRIM QAS International Sdn Bhd	24/02/2020
SR 0591 – MS 1722:2011	OSHMS	SIRIM QAS International Sdn Bhd	24/02/2020

1.3 Location of Certification Unit

Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Longitude	Latitude
Genting Sabapalm Oil Mill	KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah	117° 22' 26.8" E	5° 57' 54.3" N
Genting Sabapalm Estate	KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah	117° 22' 26.8" E	5° 57' 54.3" N

1.4 Plantings & Cycle

Estate	Age (Years) - ha				
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30
Genting Sabapalm Estate	409.18	791.79	1867.61	688.60	199.76
Total Ha	409.18	791.79	1867.61	688.60	199.76

1.5 FFB Production (Actual) and Projected (tonnage)

Producer Group	Projected from last audit	Actual Apr 2018 – Feb 2019	Projected production for next 12 months

MSPO Public Summary Report Revision 0 (Aug 2017)

	Aug 2018 – Jul 2019		Aug 19 – Jul 2020
Genting Sabapalm Estate	95,576.90	83,609.38	96,482
Total	95,576.90	83,609.38	96,482

1.6 Certified CPO / PK Tonnage

Mill	Estimated Aug 2018 – Jul 2019	Actual Apr 2018 – Feb 2019	Forecast Aug 19 – Jul 2020
Genting Sabapalm Oil Mill 20 MT/hr	CPO (OER: %)	CPO (OER: %)	CPO (OER: %)
	20,353.46 (21.30%)	17,543.94 (20.98%)	21,139.39(21.91%)
	PK (KER: %)	PK (KER: %)	PK (KER: %)
	4,129.47 (4.32)	3,418.74 (4.09%)	4,020.62(4.17%)

1.7 Certified Area

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Sabapalm Estate	3,956.94	17.39	384.27	4,358.60	90.78%
TOTAL	3,956.94	17.39	384.27	4,358.60	90.78%

1.8 Details of Certification Assessment Scope and Certification Recommendation:

BSI Services Malaysia Sdn Bhd has conducted the Re-Certification Assessment of Genting Sabapalm Oil Mill located in Sandakan, Sabah comprising Genting Sabapalm Oil Mill, Genting Sabapalm Estate and infrastructure

The assessment was conducted onsite to assess the compliance of the certification unit against the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills and MSPO Guidance.

The onsite assessment was conducted on 13 – 15 March 2019

Based on the assessment result, Genting Sabapalm Oil Mill and Genting Sabapalm Estate complies with the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills and MSPO Guidance and recommended for certification.

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
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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 13 – 15 March 2019. The audit programme is included as Appendix A. The approach to the audit was to treat the Genting Sabapalm Oil Mill and Genting Sabapalm Estate as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills 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 $S = \sqrt{n}$ where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement.

Public notification has been made on the 28/1/2019 through BSI website.

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

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

MSPO Public Summary Report
Revision 0 (Aug 2017)

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

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

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

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

1. Assessment Program					
Name (Mill / Plantation)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Genting Sabapalm Oil Mill	√	√	√	√	√
Genting Sabapalm Estate	√	√	√	√	√

Tentative Date of Next Visit: March 9, 2020 - March 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 MSPO 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.

Amir Bahari – Team Member

He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health. He is fluent in both verbal/written 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) Major & four (4) Minor nonconformities raised. The Genting Sabapalm 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.

Major Nonconformities:		
Ref	Area/Process	Clause
1750088-201903-M1	Palm Oil Mill	Part 4: 4.6.3.2
Requirements:	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.	
Statement of Nonconformity:	Payments for contractors are not paid in timely manner as per agreed contract	
Objective Evidence:	The contracts have been detailed out the pricing and the conditions of the FFB to be supplied to the mill. In the agreement stated the payment period should be made to the FFB supplier on or before 12 days of the next month from the month FFB delivered to the mill. Sighted the Payment Advice for FFB supplier A Rahman Harry bin Diong for the month of January and February 2019 were made on the 15/1/2019 and 15/2/2019. The payment period were more than agreed in the 'Polisi Perolehan Tandan Buah Sawit'. This indicates the payments are not paid in timely manner as per agreed contract.	
Corrections:	Marketing Department to communicate the agreement with finance department on the payment condition to FFB supplier.	
Root cause analysis:	The agreement details regarding the payment date for smallholders was not communicate by marketing with finance department.	
Corrective Actions:	Marketing department to provide the invoice details to the Finance department within the timeline agreed to ensure finance department could process the payment to the FFB supplier.	

MSPO Public Summary Report
Revision 0 (Aug 2017)

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.
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Major Nonconformities:		
Ref	Area/Process	Clause
1750088-201903-M2	Palm Oil Mill	Part 4: 4.5.3.3
Requirements:	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.	
Statement of Nonconformity:	The above requirement was not complied with.	
Objective Evidence:	There was no records of inventory and disposal to the authorised vendor for the disposal of the SW 410 (used PPE)	
Corrections:	<ol style="list-style-type: none"> 1. Retrain store attendant and all workers on the Scheduled Waste Management System. 2. Training done on 22.03.2019. 	
Root cause analysis:	No used PPE disposal in Schedule waste store.	
Corrective Actions:	Check on the month disposal schedule waste inventory record for any schedule waste not 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	

Major Nonconformities:		
Ref	Area/Process	Clause
1750088-201903-M3	Plantations	Part 3: 4.4.5.9
Requirements:	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	
Statement of Nonconformity:	Payment documented on the pay slips not in line with legal regulations and collective agreements.	
Objective Evidence:	2 out of 10 workers sampled was found that deduction was made to the FFB Checker (Employee No. P10024 and E10104) without any consent obtained from the authority for the penalty of sending unripe FFB to mill. Seen the deduction under category of Utilities (A. Deduction) for November 2018 and February 2019. Confirmed with the management that this was their practice to deduct FFB Checker if no proper segregation was made for unripe and ripe FFB	
Corrections:	To stop the deduction to the FFB checker for the unripe bunches.	
Root cause analysis:	The deduction to the FFB checker was implemented according to Estate FFB Quality SOP to ensure only good quality of FFB sent to the Mill	
Corrective Actions:	<ol style="list-style-type: none"> 1. To review the estate SOP on FFB Quality. (Tugas Checker 2018) 2. Internal audit checklist by Sustainability Department to check on unauthorized deduction. 	

MSPO Public Summary Report
Revision 0 (Aug 2017)

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
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Major Nonconformities:		
Ref	Area/Process	Clause
1750088-201903-M4	Plantations	Part 3 4.5.3.3
Requirements:	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.	
Statement of Nonconformity:	The above requirement was not complied	
Objective Evidence:	There was no records of inventory and disposal to the authorised vendor for the disposal of the SW 410 (used PPE)	
Corrections:	Proper training will be held for the person in charged about monitoring and documentation record of disposal SW 410 (used PPE).	
Root cause analysis:	Ineffective training for the person in charged about disposal and recording of SW 410 (used PPE).	
Corrective Actions:	<ol style="list-style-type: none"> 1. The SW 410 (used PPE) will be disposal by certificate agent. 2. The training about SW 410 (used PPE) SOP will be included in yearly training metric for monitoring. 	
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
1750088-201903-N1	Palm Oil Mill	Part 4: 4.3.1.4
Requirements:	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements	
Statement of Nonconformity:	The monitoring of the license compliance was ineffective	
Objective Evidence:	There was ineffective monitoring of the MPOB license having the fact that the total FFB processed in the entire year (1/11/17 – 31/10/18) is 115793.57mt exceeding 19793.57mt equivalent to 20.61% of the approved quantity.	
Corrections:	Monitor year to-date FFB process by monthly basis.	
Root cause analysis:	There is no monitoring on the actual FFB process against the MPOB license.	
Corrective Actions:	Divert the FFB to other Genting oil mill for processing if projected to be over capacity by the year end or as per MPOB license validity period.	
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	

MSPO Public Summary Report
Revision 0 (Aug 2017)

Minor Nonconformities:		
Ref	Area/Process	Clause
1750088-201903-N2	Palm Oil Mill	Part 4: 4.4.6.3
Requirements:	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	
Statement of Nonconformity:	The above requirement was not complied with.	
Objective Evidence:	The understanding of the PPE adherence on working at height and CPO dispatches to be enhanced for the operators and the tanker drivers.	
Corrections:	To update HIRARC and install the safety hardness hanger.	
Root cause analysis:	Dispatch area not safe for operator and tanker driver.	
Corrective Actions:	<ol style="list-style-type: none"> 1. HIRARC updated on 23.03.19 and safety hardness has been installed. 2. Dispatch operator, Lab Conductor, engineer and Manager to make sure safety procedure is follow. 	
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
1750088-201903-N3	Plantations	Part 3: 4.4.5.4
Requirements:	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.	
Statement of Nonconformity:	No evidence of contract agreement between contractors and their workers	
Objective Evidence:	Employment contract for all contractors' workers was not available in estate for review.	
Corrections:	The contractor to provide written agreement between the contractor and his workers and to send to estate for record keeping and future reference.	
Root cause analysis:	There is only verbal agreement between the contractor and his workers since the estate did not request any written agreement.	
Corrective Actions:	<p>Any new contractors engaged in future must provide written agreement between workers & contractor to estate for future reference.</p> <p>The contractor must amend the terms & condition as per estate requirement in case there is any changes.</p>	
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	

MSP0 Public Summary Report
Revision 0 (Aug 2017)

Minor Nonconformities:		
Ref	Area/Process	Clause
1750088-201903-N4	Plantations	Part 3: 4.4.6.3
Requirements:	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	
Statement of Nonconformity:	There was no training made in relation to the management of peat soil and effective understanding of whistle blowing policy.	
Objective Evidence:	a) During the site visit GSPE block 67 P20101 on 13/3/19 there was less understanding of the peat soil management b) During an interview with a staff on 14/3/19 the guidelines provided in the whistle blowing policy was unable to be understood.	
Corrections:	a) No SOP found on the peat soil management b) No effective training on whistle blowing policy.	
Root cause analysis:	a) New SOP or guidelines on the peat soil management b) Continuous training on whistle blower policy will be held.	
Corrective Actions:	a) The training for both finding will be held b) The training for both finding will be held c) The monitoring on this both finding will be included in the training metric.	
Assessment Conclusion:	Evidence submitted: i. New SOP / guidelines on peat soil management and whistle blowing policy. 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	Positive comments from all stakeholders interviewed
2	All personnel were cooperative during the assessment process

3.3 Status of Nonconformities Previously Identified and OFI

Major Nonconformities:		
Ref	Area/Process	Clause
1615282-201803-M1	Palm Oil Mill and Plantations	4.1.3.1 (Part 3 and Part 4)
Requirements:	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.	
Statement of Nonconformity:	The minute for MRM was not adequate.	
Objective Evidence:	<p>Management Review procedure (Sustainability Management Procedure Manual (SMP-GPB-06) Revision:00 dated 1/8/2013) was established accordingly. However, some of the agenda was not discussed during MRM:</p> <ol style="list-style-type: none"> 1. Changes, improvement or modification of the Sustainability Management System 2. Complaints and Grievances 3. Stakeholder meeting 4. Green house value 5. Review on resource and training requirements 6. Review of Sustainability Policy and its objectives status 7. Review of effectiveness in achieving quality, environmental, social, safety and health 8. Compliance status on legal and other requirements. 	
Corrections:	To re-conduct management review meeting and cover all agenda as per the procedure.	
Root cause analysis:	Management review conducted without referring to the procedure (SMP-GPB-06).	
Corrective Actions:	To refer the company procedure during conducting management review meeting to ensure that all relevant required details are discussed and included in the minutes.	
Assessment Conclusion:	<p>Evidence submitted:</p> <ol style="list-style-type: none"> i. Copy of re-conducted minutes of meeting dated 21/5/2018 where all the required agenda of the standard have been recorded. ii. Copy of the Management Review procedure [SMP-GPB-06, rev. 1, dated 25/5/2018] which is used as reference to conduct a management review. <p>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.</p>	
Current Assessment Status:	<p>The management review was conducted once a year as per SOP established and documented in the Sustainability Management Procedure Manual under section Management Review refer document no SMP-GPB-06 rev 1 dated 25/5/2018. Latest Management Review Meeting was conducted on 7/3/2019. The management review discuss:</p> <ol style="list-style-type: none"> i. Changes, improvement or modification of the Sustainability Management System ii. Complaints and Grievances iii. Stakeholder meeting iv. Green house value 	

MSPO Public Summary Report
Revision 0 (Aug 2017)

	<p>v. Review on resource and training requirements vi. Review of Sustainability Policy and its objectives status vii. Review of effectiveness in achieving quality, environmental, social, safety and health viii. Compliance status on legal and other requirements ix. Any other matters x. Preventive and corrective actions xi. Recommendation for improvement xii. Customer feedbacks xiii. Follow up action from management review xiv. Changes that could affect the management system</p> <p>Sighted the minutes meeting of the meeting conducted. In the minutes stated the agenda discussed, matters arising, action takes, person in charge and status. Issue raised during the meeting been addressed by the estate management.</p> <p>Hence the 1615282-201803-M1 raised in the 2018 audit is therefore closed and concluded.</p>
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Major Nonconformities:		
Ref	Area/Process	Clause
1615282-201803-M2	Plantations	4.5.1.6 (Part 3)
Requirements:	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.	
Statement of Nonconformity:	No meeting was conducted to discuss about environmental quality.	
Objective Evidence:	At Genting Sabapalm Estate, no assessment related to greenhouse gas emissions was conducted.	
Corrections:	To form environmental committee meeting and conduct meeting.	
Root cause analysis:	The Environmental issue and quality already conducted during Training and muster call to all worker to cover MSPO requirement however no meeting conducted specific discuss regarding the Environmental quality.	
Corrective Actions:	i. To conduct the meeting during OSH meeting (quarterly) ii. To include the environmental committee in the estate stakeholder meeting	
Assessment Conclusion:	Evidence submitted: i. Copy of Environmental Committee Organization Chart ii. Copy of the minutes of meeting of the Sabapalm Environmental Committee dated 4/5/2018. 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.	
Current Assessment Status:	Discussions on environmental issues were discussed during the environmental meeting scheduled annually. Minutes of meeting dated 04/5/2018 chaired by the Estate Manager was sighted and verified. Mainly the discussion focussed on the scheduled waste and domestic waste handlings. Hence the NCR 1615-282-201803-M2 raised in the 2018 audit is therefore closed and concluded.	

MSPO Public Summary Report
Revision 0 (Aug 2017)

Major Nonconformities:		
Ref	Area/Process	Clause
1615282-201803-M3	Plantations	4.5.4.1 (Part 3)
Requirements:	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.	
Statement of Nonconformity:	The assessment of all polluting activities was not adequate.	
Objective Evidence:	At Genting Sabapalm Estate, no assessment related to greenhouse gas emissions was conducted.	
Corrections:	To amend and review the current Environmental Aspect and Impact Assessment (EAI) to include the GHG(Greenhouse Gas) as an additional impact follows: "Global Warming/ GHG"	
Root cause analysis:	GSPE thought that the impact such as "Global Warming" and "Ozone Layer Depletion" are sufficient to cover the "gaseous emission" requirements.	
Corrective Actions:	To review Environmental Aspect And Impact Procedure (SMP-GPB-29) to include GHG as an Impact.	
Assessment Conclusion:	Evidence submitted: i. Copy of revised EAI Assessment where the environmental impact "Global warming/GHG" has been included ii. Copy of the minutes of amended EAI Procedure (SMP-GPB-29) 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.	
Current Assessment Status:	The management has submitted evidence of the revised EAI Assessment where the environmental impact "Global warming/GHG" has been included. Copy of minutes of amended EAI Procedure (SMP-GPB-2) was sighted and verified. Hence the NCR 1615-282-201803-M3 raised in 4.5.4.1 is closed and concluded.	

Minor Nonconformities:		
Ref	Area/Process	Clause
1615282-201803-N1	Palm Oil Mill and Plantations	4.3.2.4
Requirements:	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).	
Statement of Nonconformity:	There is lack of evidence that the decision (to temporary maintain the current situation and stakeholder need to write letter to Genting to own the land) have been accepted with free, prior and informed consent (FPIC).	
Objective Evidence:	Based on consultation with stakeholder, there's a feedback from the Village Head of Kampung Tembidong-bidong asking the status on conflicted area at the underplanted area within Genting Sabapalm Estate Sapi Division at blok 17 and block 8. The area located at the boundary of Kaumung Tembidong-bidong smallholders whom overplanted within estate's underplanted area. Further trail of stakeholder's feedback revealed that Genting Sabapalm Estate management has conducted meeting with affected stakeholder as per record available i.e. Mesyuarat dengan orang berkepentingan (Kampung Tembidongbidong)	

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

	<p>Terlebih tanam di Kawasan Ladang Genting Sabapalm; Date: 11/7/2015; Attendance: Sim Gik Tzi (Estate Manager); Jalaluddin Harun; Balatos Kalamang; Jaafar Saratin; Nasry Kalamang; Sapuddin Ungkil; Kevin Yam Tuck Cheong (AM); Alian John Moncal; Pawajang Pamalu.</p> <p>Based on the minutes of meeting records, the decision by then Estate Manager was to temporary maintain the current situation and stakeholder need to write letter to Genting to own the land.</p> <p>Sighted too the mapping of underplanted area within Sabapalm Estate Sapi Division block 8 and block 17 which currently overplanted by the following smallholders:</p> <ul style="list-style-type: none"> - Balatos bin Kolomong: 1.31 ha - Nasry bin Kolomong: 0.41 ha - Jaafar bin Jaji Saratin: 0.13 ha - Sapuddin bin Harun: 0.15 ha - Jalaluddin bin Harun: 0.67 ha - Balatos bin Kolomong: 0.47 ha - Nasry bin Kolomong: 0.41 ha - Jaafar bin Haji Saratin: 0.13 ha - Sapuddin bin Harun: 0.15 ha - Jalaluddin bin Harun: 0.67 ha - Balatos bin Kolomong: 0.84 ha <p>Totalling the area of 4.28 ha.</p> <p>There's also incomplete records of smallholders ownership sighted as following:</p> <ul style="list-style-type: none"> - Letter from officer of Jabatan Tanah dan Ukur Sabah, Malaysia; Surat pengesahan permohonan tanah (to Pegawai Penguasa Pertanian, Beluran); Ref. # 32/2/Vol.2/50 RJA/har; date: 14/7/1986; by Penolong Pemungut Hasil Tanah, Beluran. - Letter to Juru Ukur Daerah, Sandakan; Pemelihara Huran, Sandakan; Pegawai Pertanian Kanan, Sandakan; Ref. # 12/12/Vol.6/95; Date: 9/1/1985; for acknowledgement of PT85080061 seluas 3ha untuk pertanian - MPOB license (expired) # 418121-101000; Nasri bin Kalamang; Menjual & Mengalih; validity: 8/5/2008-30/4/2013; Lot PT83081637 Nangoh, Labuk/Sugut, Daerah Sandakan, Sabah; Total area: 0.81ha; date: 4/5/2011 <p>Although the evidence from the minutes of meeting records mentioned that the decision by then Estate Manager was to temporary maintain the current situation and stakeholder need to write letter to Genting to own the land i.e. in other meaning was that Genting Sabapalm Estate allowed the smallholders to continue use Genting's underplanted area however the feedback by village representative, minutes of meeting records and mapping records shown lack of evidence that the decision have been accepted with free, prior and informed consent (FPIC).</p>
<p>Corrections:</p>	<p>To conduct meeting with the affected stakeholders to discuss the land encroachment issue and confirm the resolution/negotiated agreement with participation by top management.</p> <ul style="list-style-type: none"> i. All relevant record ie, attendance record, photos etc. to be documented and filed securely for future reference. ii To update estate map and area statement to show the "underplanted or "encroached" areas clearly.
<p>Root cause analysis:</p>	<ul style="list-style-type: none"> • No records of agreement for both parties on the land encroachment issue. • GSPE misplaced the attendance record of meeting with the village representatives. • The encroachment areas are missed to be shown in GPS map and area statement accordingly ie as "under-planted"

Corrective Actions:	<ul style="list-style-type: none"> • All evidence of communication, report, photos and any agreement must be kept securely(in form of hard and soft copy) for future reference. • To ensure resolution/negotiated agreements are available as part of evidence that any decision by both parties are accepted with FPIC(as per Negotiation & Compensation Procedure SMP-GPB-18
Assessment Conclusion:	The correction and corrective action plan are accepted. As this is a minor NCR, the evidence of implementation and its effectiveness shall be verified in the next assessment.
Current Assessment Status:	<p>There are issue regarding smallholders encroached the estate land. Meeting was conducted with the involved smallholders on 25/2/2019.</p> <p>In the meeting, the Sustainability explained to the smallholders regarding the status of the land encroached as the Genting Plantations is the rightful owner. They also informed the smallholders that they will continue to maintain current situation with terms that they are not allowed to expand the area and construction of any new buildings. Any replanting work to be conducted, the smallholders must communicate with GSPE before proceed.</p> <p>The smallholders have also asked some questions during the Q&A session and replied by the Sustainability Manager on the spot. Conclusion, the smallholders agreed and understood the outcome of discussion and have acknowledged on the minute received.</p> <p>GPS map for the land encroached area has been prepared by the Genting Plantation Research Centre as per email dated 14/11/2018 and available at the estate for review.</p> <p>Hence the 1615282-201803-N1 raised in the 2018 audit is therefore closed and concluded.</p>

3.4 Issues Raised by Stakeholders

IS #	Description
1	<p>Issues:</p> <p>Pejabat Verteriner</p> <ul style="list-style-type: none"> - Relationship between GSPE and Pejabat Verteriner is good as the estate always communicate through phone call and email. - The estate always give cooperation with the department during visit
	<p>Management Responses:</p> <ul style="list-style-type: none"> - Will maintain the good relationship
	<p>Audit Team Findings:</p> <ul style="list-style-type: none"> - No further issue
2	<p>Issues:</p> <p>Imigresen Department</p> <ul style="list-style-type: none"> - Passport send for renewal of work permit arrive late at the Imigresen office
	<p>Management Responses:</p> <ul style="list-style-type: none"> - Management will conduct meeting with the agent appointed MNK regarding the issue and ensure all passport arrive on time for renewal
	<p>Audit Team Findings:</p> <ul style="list-style-type: none"> - No further issue

3	Issues: - The stakeholder requesting for road maintainence of Jalan Lumatik to Kg. Tagas
	Management Responses: - The estate have own road maintainence program. The road maintainence will only done until Sekolah Tagas-Tagas which will benefits all communities
	Audit Team Findings: - No further issue
4	Issues: Balai Polis Tagas-Tagas - Requested for water supply to be delivered timely and adequately
	Management Responses: - The management will supply the water timely and adequately base on availabilty of transport (tractor and water tank)
	Audit Team Findings: No further issue
5	Issues: Sekolah Sabapalm - Requested for budget allocation for building maintainence
	Management Responses: - The estate continuously provided support to the school on building maintainence. The management is currently in discussion with the SVP at Pejabat Pendidikan Beluran regarding the school status.
	Audit Team Findings: No further issue

3.5 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1750088-201903-M1	Major	15/3/2019	Closed (21/5/2019)
1750088-201903-M2	Major	15/3/2019	Closed (21/5/2019)
1750088-201903-M3	Major	15/3/2019	Closed (21/5/2019)
1750088-201903-M4	Major	15/3/2019	Closed (21/5/2019)
1750088-201903-N1	Minor	15/3/2019	To be verified during next assessment
1750088-201903-N2	Minor	15/3/2019	To be verified during next assessment
1750088-201903-N3	Minor	15/3/2019	To be verified during next assessment
1750088-201903-N4	Minor	15/3/2019	To be verified during next assessment

3.6 Summary of the findings by Principles and Criteria

Malaysian Sustainable Palm Oil 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 -	Genting Plantation has established MSPO Policy signed by the President and Chief Operating Officer dated 18/3/2014	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The established policy has emphasized on the commitment to continual Improvement within the journey towards achieving sustainable palm oil.	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 -	Sustainability Department has conducted the internal audit on annually basis. Any non-conformities found during the internal audit has to be addressed by the operating units and CAP need to be established. Latest internal audit was conducted on 22-23/1/2019 with 2 auditors. Audit covered both documentation and operation for the mill for RSPO and MSPO requirements. Issues raised during the internal audit has been addressed by the mill management.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of	Genting Plantation has established the SOP for internal audit and documented in Sustainability Management Procedure Manual under	Complied

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

Criterion / Indicator		Assessment Findings	Compliance
	strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	section Sustainability Internal Audit. Refer document no. SMP-GPB-03. The procedure was mentioned about the audit criteria, audit plan, the role of Lead Auditor, Team member and etc. Corrective action plan has been developed with root cause and preventive action of the non-conformities identified.	
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	The estate keep records for all internal audit conducted and action taken for review. Sighted the internal audit report FY 2019 and 2018 were 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 -	The management review was conducted once a year as per SOP established and documented in the Sustainability Management Procedure Manual under section Management Review refer document no SMP-GPB-06 rev 1 dated 25/5/2018. Latest Management Review Meeting was conducted on 7/3/2019. The management review discuss: i. Changes, improvement or modification of the Sustainability Management System ii. Complaints and Grievances iii. Stakeholder meeting iv. Green house value v. Review on resource and training requirements	Complied

Criterion / Indicator		Assessment Findings	Compliance
		vi. Review of Sustainability Policy and its objectives status vii. Review of effectiveness in achieving quality, environmental, social, safety and health viii. Compliance status on legal and other requirements ix. Any other matters x. Preventive and corrective actions xi. Recommendation for improvement xii. Customer feedbacks xiii. Follow up action from management review xiv. Changes that could affect the management system Sighted the minutes meeting of the meeting conducted. In the minutes stated the agenda discussed, matters arising, action takes, person in charge and status. Issue raised during the meeting been addressed by the estate management.	
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 -	The company has issued a memo with a list of documents that could be requested by the stakeholders dated 23/7/2015. Genting Plantations Berhad is open to all the stakeholders to request information such as policies, SEIA reports and management plans, audit reports, pollution reduction plans, complaint & grievances	Complied

Criterion / Indicator		Assessment Findings	Compliance
		procedure, FPIC procedure and land title. The stakeholders will fill in the Enquiry Register Book in order to access to the documents. Sustainability Report and Annual Report will be publicly available in the company's website: www.gentingplantations.com.	
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. - Major compliance -	The estate currently on trial to use new machinery, Big Bull to improve FFB evacuation at peat area. Refresher training was conducted on 21/11/2018.	Complied
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	Training was conducted by the principal (Jindar Sdn Bhd). Sighted the training records conducted on 21/11/2018 and attended by all relevant workers, staff, assistants and manager.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance -	Genting Sabapalm Estate is transparent and open to communicate its information on environmental, social and legal issues relevant to sustainability practice to the public, e.g. i. Company annual report ii. Group policies	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> iii. Reports related to environment i.e. EAI (Environmental Aspect Impact Assessment), EIA (environmental Impact Assessment etc. iv. RSPO external audit reports v. Pollution prevention plan vi. Continuous improvement plan vii. Complaints and grievances book and its procedure viii. Negotiation and compensation procedure ix. Sexual harassment procedure x. Estate/mill maps and land titles xi. Any reports or information related to HCV area xii. Any reports or information related to social i.e. SIA xiii. RSPO internal audit report <p>This is addressed in its Sustainability Management Procedure Manual under section Procedures on Request and Responses. Refer document no. SMP-GPB-25, rev. 00, dated 14/8/2014.</p>	
4.2.1.2	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>The management documents which are publicly available are mentioned in Indicator 4.2.1.1. Any request of information shall be recorded in GSOM's Enquiry Register Book. Based on the book, as at to-date, there has been no request for information from any stakeholders.</p>	Complied
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p>	<p>Genting Plantations has established SOP for consultation and communication and documented in Sustainability Management Procedure Manual under section Procedures for Consultation and</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Communication. Refer document no. SMP-GPB-17, rev. 02 dated 23/2/2018.	
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 -	The management has appointed the Senior Manager as person responsible for consultation and communication with the relevant stakeholders as per appointment letter dated 6/4/2017 signed by the Vice President/General Manager Plantation (Region 1)	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 estate has established records for all the stakeholders. Over 200 stakeholders identified and grouped into several groups such as Government Agencies, FFB Transporters, Suppliers and Smallholders. Meeting with stakeholders conducted once a year as per SOP. Latest stakeholders meeting was conducted on 26/11/2018	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 -	Genting Plantation has established SOP for traceability and documented in Sustainability Management Procedure Manual under section Supply Chain and Traceability (mill). Refer document no. SMP-GPB-9 rev. 3 dated 18/1/2018.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The management monitored the compliance with the traceability system established through supply chain internal audit conducted. Latest internal audit was conducted on 22-23/1/2019 with 2 auditors. Issues raised during the internal audit has been addressed by the estate management.	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

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 management has appointed 2 weighbridge clerk to maintain the traceability systems ape per appointment letters dated 1/9/2014.	Complied									
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	Records of FFB delivery/transportation to GSOM was maintained adequately. Document such as FFB Dispatch Advice and Delivery/Goods Received Advice were available for review. Sighted the FFB delivery/transportation dated 15/1/2019, 16/1/2019 and 17/1/2019.	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 -	<p>Genting Sabapalm Estate continued to comply with legal requirements. Compliance to each applicable law and regulation is monitored by estate management, Regional Office and sustainability Department. The licenses and permits governed by the Local, State and Federal authorities among others as shown below;</p> <table border="1"> <thead> <tr> <th></th> <th>License / Permits</th> <th>Validity /Ref no</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Certificate fitness for air compressor-SD PMT 11734</td> <td>15/7/2019</td> </tr> <tr> <td>2</td> <td>Sabah small ship licence-BN 1598/7/P: expire on 29/9/18. Renewal sighted</td> <td>29/9/18</td> </tr> </tbody> </table>		License / Permits	Validity /Ref no	1	Certificate fitness for air compressor-SD PMT 11734	15/7/2019	2	Sabah small ship licence-BN 1598/7/P: expire on 29/9/18. Renewal sighted	29/9/18	Complied
	License / Permits	Validity /Ref no										
1	Certificate fitness for air compressor-SD PMT 11734	15/7/2019										
2	Sabah small ship licence-BN 1598/7/P: expire on 29/9/18. Renewal sighted	29/9/18										

Criterion / Indicator		Assessment Findings		Compliance	
		3	Permit Potongan Daripada Gaji pekerja, Seksyen 113(4), Ordinan Buruh (Sabah 67)	09/12/2020	
		4	Lesen untuk Menggaji Pekerja Bukan Pemastautin, Seksyen 118, Ordinan Buruh,	12/8/2019	
		5	MPOB License 57443901-000 Menjual dan mengalih FFB,	30/6/2019	
		6	Trading license Perladangan Kelapa Sawit	31/12/19	
		7	Lesen Bagi Pemasangan Persendirian AKTA Bekalan Elektrik	18/7/19	
4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>The Legal Requirements Register (LRR) covers all the necessary regulatory requirements. The LRR for was reviewed on 23/1/19. The list of applicable legal and other requirements was made available during the assessment and complied in the Sustainability Management Procedure Manual SMP-GPB-22 having revision no. 6. The list comprises of the following sections</p> <ul style="list-style-type: none"> a) Environment / Safety & Health / Social b) Best practices & other requirements c) International Standards Requirement <p>Among others the identified applicable laws and regulations relevant to its operations included the;</p> <ul style="list-style-type: none"> a) Environmental Quality Act 1974 and its Regulations, b) Factories and Machinery Act 1967 and its Regulations, c) Occupational Safety and Health Act 1994 and its Regulations, d) Pesticides Act, 1974, e) Worker’s Minimum Standards Housing & Amenities Act, 1990. 		Complied	

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> f) Wildlife conservation Act 2010 g) Malaysian Palm Oil Board 1998 h) Holiday Act 1951 i) Land Ordinance (Amended Ordinance) j) Forest Enactment 1968 (Sabah No 2 of 1968) k) Native Courts Ordinance 1992 l) Passport Act 1966 m) Workers Union Act 1959 n) Estate Hospital Assistants (Registration) Act 1965 o) Petroleum (safety Measures) Act 1984 p) Fire Services Act 1984 q) Sales Tax Act 1972 – Sabah No 9 of 1972. r) Uniform Building By Laws 1986 s) Weights And Measures Act 1972 (Act 71) (Amendment 1981) 	
<p>4.3.1.3 The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>The Sustainability Department SD, based Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills. SD which is based in <i>Wisma Genting</i> is responsible for tracking any changes to the Acts and Regulations. In addition, the SVP Processing (Malaysia) also played a role in disseminating new Acts & Regulations to all the estates in the Group.</p> <ul style="list-style-type: none"> a) This was made via communication with the publisher of the documents. b) This mechanism was outlined in the procedure. c) The updating of the legal register is made on a periodical basis. d) Changes in the legal register if any are communicated to the respective regions. 	<p>Complied</p>

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<p>The mill had entirely adopted the GPB established documented system for identifying, tracking, accessing and updating the legal requirements. It had ensured that all applicable legal requirements pertaining to MSPO are established, implemented and maintained. The latest revision on the LRR was made dated 31/1/19 on the following changes;</p> <ul style="list-style-type: none"> a) Minimum Wages Order 2018 b) Drainage and Irrigation Ordinance 1956 c) Sabah water resources enactment 2002 d) EIA Order 2005 e) Wildlife Conservation Enactment 1997 f) Forest Enactment 1968 (Sabah) g) Employment Insurance Scheme Act 2017 h) Sabah Labour Ordinance Cap 67, 1950 	
4.3.1.4	<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>The Estate Manager appoints the Chief Clerk <i>Mdm Helena Bukukan</i> as the PIC for updating changes in laws at GSPE. Letter dated 06/8/15 was sighted and verified.</p>	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>The estate ensures that oil palm cultivation activities does not diminish the land use right of others by having the land titles and demarcation of boundary based on the titles.</p>	
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of</p>	<p>The estate is operated on a legal ownership of land. Details as provided below;</p>	Complied

Criterion / Indicator		Assessment Findings				Compliance																			
	<p>the land.</p> <p>- Major compliance -</p>	<table border="1"> <thead> <tr> <th>No</th> <th>Title no. Lease</th> <th>Ha</th> <th>Lease period</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>08510997</td> <td>2118.12</td> <td>10/7/1888-10/7/2887 - 999 years</td> </tr> <tr> <td>2</td> <td>08510996</td> <td>1957.46</td> <td>10/7/1888-10/7/2887 - 999 years</td> </tr> <tr> <td>3</td> <td>085319231</td> <td>283.00</td> <td>01/1/1987-31/12/2085</td> </tr> <tr> <td></td> <td>Total</td> <td>4358.58</td> <td></td> </tr> </tbody> </table> <p>The land is for the purpose of cultivation of oil palm. All documents were sighted and verified.</p>	No	Title no. Lease	Ha	Lease period	1	08510997	2118.12	10/7/1888-10/7/2887 - 999 years	2	08510996	1957.46	10/7/1888-10/7/2887 - 999 years	3	085319231	283.00	01/1/1987-31/12/2085		Total	4358.58				
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3	085319231	283.00	01/1/1987-31/12/2085																						
	Total	4358.58																							
4.3.2.3	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	<p>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 at the following points confirmed that they were clearly marked and maintained.</p> <ul style="list-style-type: none"> a) OP2011 Block 98 boundary to <i>Styland Plantations Masih Jaya Estate</i> b) OP 2013 Block 35A adjacent to <i>Kg Klagan</i>. 				Complied																			

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.3.2.4	<p>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).</p> <p>- Minor compliance -</p>	<p>There are issue regarding smallholders encroached the estate land. Meeting was conducted with the involved smallholders on 25/2/2019.</p> <p>In the meeting, the Sustainability explained to the smallholders regarding the status of the land encroached as the Genting Plantations is the rightful owner. They also informed the smallholders that they will continue to maintain current situation with terms that they are not allowed to expand the area and construction of any new buildings. Any replanting work to be conducted, the smallholders must communicate with GSPE before proceed.</p> <p>The smallholders have also asked some questions during the Q&A session and replied by the Sustainability Manager on the spot. Conclusion, the smallholders agreed and understood the outcome of discussion and have acknowledged on the minute received.</p> <p>GPS map for the land encroached area has been prepared by the Genting Plantation Research Centre as per email dated 14/11/2018 and available at the estate for review.</p>	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	<p>Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.</p> <p>- Major compliance -</p>	No lands are encumbered by customary rights identify in the estate.	Complied
4.3.3.2	<p>Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available.</p> <p>- Minor compliance -</p>	No lands are encumbered by customary rights identify in the estate.	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

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 -	No lands are encumbered by customary rights identify in the 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 -	Genting Plantations has conducted social impact assessment for both Sabapalm Oil Mill and Sabapalm Estate and documented in Social Impact Assessment (SIA) & Human Rights Impact Assessment (HRIM) on 6-7/4/2017. The objective of the assessment was to assess change in social and environmental condition which subsequently have impacts on the people. The assessment has involved the participation of internal and external stakeholders. All the issues raised by the stakeholders during the assessment were recorded in the report. The social impact assessment need to be re-assessed tentatively in July 2019 as per SOP Sustainability Management System Procedure under Section Social Management. Refer document no. SMP-GPB-32 rev 0 dated 18/1/2018.	Complied
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	Genting Plantations has established the SOP dealing with complaints and grievances and documented in Sustainability Management System Procedure under Section Complaints and Grievances procedure. Refer document no. SMP-GPB-19, Rev. 03 dated 21/3/2018.	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	The estate has implemented Complaints/ Grievances Record Book to record any complaints and grievances. The complainants have acknowledged on the complaint form after actions have been taken. The system established was found to be effective in managing complaints raised.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	The complaint/grievances form were available at the office the estate office and estate canteen. All the complaint/grievances were recorded in the complaint/grievances record books.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	The internal and external stakeholders aware regarding the complaint/grievances procedure established as it was brief during stakeholder meeting. Sighted the latest minutes meeting with stakeholders conducted on 26/11/2018.	Complied
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	The estate maintain records for all complaints/grievances and action taken to addressed the complaints/grievances raised in Complaints/Grievances record books	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	The estate management has made contribution to the local communities such as provide job opportunity to local people. Additionally, the estate has addressed all request made by the local communities such as:	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		i. Providing Community Hall, chairs and sound system for Humana Scholl Convocation Ceremony dated 15/11/2018 ii. Concrete work for SK Ladang Sabapalm Assembly Ground and 'Taman Sains Sekolah' dated 14/11/2018 iii. Contribution for sportday carnival by SK Ladang Sabapalm, dated 7/11/2018 iv. Supply water for Balai Polis Tagas – Tagas dated 6/3/2019	
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	The Safety Policy signed the President /Chief Operating Procedure dated 01/7/18 has been established. Therein containing among others the following; <ul style="list-style-type: none"> a) To maintain a safe and healthy working environment for all employees /others b) To comply with all applicable safety legislation, code of practice, requirement. c) Create awareness by providing all relevant information, WI, supervision and trainings to employees. d) Prevent accidents, injuries, and occupational illness as well as conduct investigations and take necessary steps/actions to ensure such accidents do not recur e) All employees shall be responsible and accountable to achieve the abovementioned practices. 	Complied
4.4.4.2	The occupational safety and health plan shall cover the following:	The estate had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard	Complied

Criterion / Indicator	Assessment Findings	Compliance																																				
<p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risks of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied <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 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</p>	<p>identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following;</p> <ul style="list-style-type: none"> a) Change in work process b) Revision/changes in legislative requirement c) Occurrence of accidents <p>The estate had list of review on HIRARC dated 16/3/18 to 25/1/19 within a committees meeting held on 25/1/19.</p> <table border="1" data-bbox="1048 799 1809 1362"> <thead> <tr> <th></th> <th>Areas/Activities</th> <th></th> <th>Areas /Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Palm /bunch census</td> <td>1 1</td> <td>Harvesting & collection</td> </tr> <tr> <td>2</td> <td>Circle /selective spraying</td> <td>1 2</td> <td>Transportation workers</td> </tr> <tr> <td>3</td> <td>Confined space</td> <td>1 3</td> <td>Walking palm to palm</td> </tr> <tr> <td>4</td> <td>Drainage-machine/ manual</td> <td>1 4</td> <td>Loose fruit collection</td> </tr> <tr> <td>5</td> <td>Grass cutting</td> <td>1 5</td> <td>In field machine 15 mt</td> </tr> <tr> <td>6</td> <td>Compound sanitation</td> <td>1 6</td> <td>Water catchment</td> </tr> <tr> <td>7</td> <td>Fertilizer application</td> <td>1 7</td> <td>Chemical mixing</td> </tr> <tr> <td>8</td> <td>Replanting</td> <td>1 8</td> <td>Nursery</td> </tr> </tbody> </table>		Areas/Activities		Areas /Activities	1	Palm /bunch census	1 1	Harvesting & collection	2	Circle /selective spraying	1 2	Transportation workers	3	Confined space	1 3	Walking palm to palm	4	Drainage-machine/ manual	1 4	Loose fruit collection	5	Grass cutting	1 5	In field machine 15 mt	6	Compound sanitation	1 6	Water catchment	7	Fertilizer application	1 7	Chemical mixing	8	Replanting	1 8	Nursery	
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**MSPO Public Summary Report
Revision 0 (Aug 2017)**

Criterion / Indicator	Assessment Findings				Compliance
<p>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>	9	Bridge maintenance	1 9	Workers quarters	
10	Water treatment plant	2 0	Buffalo system		
<p>Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were displayed at all work stations in the mill and estate office and workshop. In general, the control measures were appropriate to the identified risks.</p> <p>The estate conducts CHRA last in Sept 2014. The forthcoming session has been scheduled 09/4/19. Assessor <i>M/s Noormahani Harun JKPP HIE 127/171-2(154)</i>.</p> <p>The estate provides PPE to the employees such as apron, safety helmets, and safety shoes relevant to the work handled by the workers. Records of PPE issuance for the estate were sighted. During the site visit workers was observed to be in PPE. Based on the HIRARC carried out at the estates the PPE types for the various activities has been identified and implemented.</p> <ul style="list-style-type: none"> a) Harvester- Safety helmet, sickle cover, hand glove. wellington boots b) Sprayers- Respirator, nitrile glove (Chemical Resistant) goggles, wellington boots, apron. c) Manuring- Apron, wellington boots, dust mask, nitrile glove. 					

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator	Assessment Findings	Compliance																		
	<p>d) Water treatment Plant Operator - Safety boots, ear muff, safety vest, helmet, cotton glove, dust mask.</p> <p>Sighted issuance of PPE record for the following employees in 2018.</p> <p>The estate management conducts regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held are recorded below</p> <table border="1" data-bbox="1050 775 1753 1023"> <thead> <tr> <th>No</th> <th>Date</th> <th>Attendees</th> <th>No</th> <th>Date</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>20/12/19</td> <td>17</td> <td>3</td> <td>13/8/18</td> <td>16</td> </tr> <tr> <td>2</td> <td>16/11/18</td> <td>14</td> <td>4</td> <td>26/6/18</td> <td>16</td> </tr> </tbody> </table> <p>Agenda discussed;</p> <ul style="list-style-type: none"> a) Confirmation of minutes previous meeting b) Workplace inspection report c) Accident report d) Medial surveillance & Audiometric e) Status of Safety Program & Environmental f) First Aid Kit & Fire Extinguishers Report g) HIRARC h) Complaint from Employee/External Party. 	No	Date	Attendees	No	Date	Attendees	1	20/12/19	17	3	13/8/18	16	2	16/11/18	14	4	26/6/18	16	
No	Date	Attendees	No	Date	Attendees															
1	20/12/19	17	3	13/8/18	16															
2	16/11/18	14	4	26/6/18	16															

Criterion / Indicator	Assessment Findings	Compliance								
	<p>i) Other matters Workplace inspections are made prior to the OSH meeting.</p> <p>The Estate Senior Manager was appointed as Chairman through letter dated 16/5/18 signed by Vice President Plantations (Sabah Region 1). The letter was sighted and verified.</p> <p>The procedures for accident and emergencies has been established. There is formation of ERP Team & ERP for all the identified incidences. In addition the procedures have been summarised in a chart flow form and displayed for information of all employees in the estate. They includes emergencies relating fire, chemical spillage, flood and accident at work place.</p> <ul style="list-style-type: none"> a) <i>Ahli J/Kuasa Pasukan Bertindak Kecemasan 2019</i> headed by the Estate Manager b) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Kebakaran</i> c) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Banjir</i> d) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Kimia</i> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SD and amended to tailor to the situation differences in the estate and mill.</p> <table border="1" data-bbox="1048 1300 1599 1398"> <thead> <tr> <th></th> <th>Emergency situation</th> <th>Mill</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Fire</td> <td>/</td> <td>/</td> </tr> </tbody> </table>		Emergency situation	Mill	Estate	1	Fire	/	/	
	Emergency situation	Mill	Estate							
1	Fire	/	/							

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

Criterion / Indicator	Assessment Findings				Compliance			
		2	Oil spillage	/				
		3	Effluent overflow	/				
		4	Chemical spillage	/	/			
		5	Flood		/			
		6	Accident at work place		/			
		<p>ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training.</p> <p>The trained personnel for the First Aid were among the employees working as field staff/mandores. The first aid boxes were available at various points in the estate office, workshop, and store. The estate distributed the first aid box to the mandores and brought along to the field during operations. In addition, there are also first aid boxes kept in the office, store and workshops</p> <p>Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKKP 8 a mandatory requirement was submitted to DOSH on 8/1/19. Accident Statistics are being maintained in a satisfactory manner</p>						
		<table border="1"> <tr> <td data-bbox="1037 1337 1167 1388"></td> <td data-bbox="1167 1337 1733 1388">No of cases</td> </tr> </table>					No of cases	
	No of cases							

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings					Compliance
			cases	LTI	Non LTI	Total	
		GSPE	3	5	4	7	
Criterion 4.4.5: Employment conditions							
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>Genting Plantations has established Social Policy incorporating the Labour and Human Rights Requirement signed by the President and Chief Operating Officer on 22/6/2015.</p> <p>The policy were communicate to the employee through training, briefing and displayed on notice board. Sighted the training records on the Company Policy training dated 7/4/2018, 9/4/2018 and 4/3/2019.</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>Genting Plantations has established Social Policy incorporating the Labour and Human Rights Requirement signed by the President and Chief Operating Officer on 22/6/2015.</p> <p>The Social Policy stated the commitment of the company not supporting any discriminatory practices documented in Non Discrimination section. In the policy stated the company shall not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.</p>					Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.5.3 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>Employment contract were issued to the workers before started working in the estate. The employment contract were acknowledge and accept/signed by the workers. A copy of the contract kept by the workers and verified through interviewed with the workers. The terms and conditions were clearly stated in the ‘Perjanjian Pekerjaan’ such as salary, working hours and overtime work. The contract were written in the language understand by the employee. Pay and conditions are documented and are above the Minimum Wage Order 2018.</p> <p>The workers are in monthly rate salary of minimum RM 1100. Sampled of the payslips confirmed that the workers were paid in accordance with Minimum Wage Order 2018. Sighted the sampled payslip for January and February 2019 as follows:</p> <ul style="list-style-type: none"> i. E11163 ii. E10932 iii. E11040 iv. E10699 v. E10033 vi. E11028 vii. E00765 viii. E10010 ix. P10024 x. E10104 	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.5.4 Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>The management monitored the salary payment for contractors employee compliance with Minimum Wages Order 2018 by obtaining the copy of employee pay slips from the contractors as per stated in the contract agreement between the management and contractors.</p> <p>However, the employment contract for all contractors' workers was not available in estate for review.</p>	<p>Minor NC</p>
<p>4.4.5.5 The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The estate management has established records for all the workers employed and documented in the Labour Master Out-Turn. Latest update was done on February. In the list stated the full names, employee no., gender, date of birth, date of entry, a job description/station, wage and the period of employment.</p>	<p>Complied</p>
<p>4.4.5.6 All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>Employment contract were issued to the workers before started working in the estate. The employment contract were acknowledge and accept/signed by the workers. A copy of the contract kept by the workers and verified through interviewed with the workers. The terms and conditions were clearly stated in the 'Perjanjian Pekerjaan' such as contract period, working area, employee responsibilities, salary, working hours, overtime work, rest day, public holiday, housing, working tools, medical, sick leave, annual leave, employment termination period and condition. The contract were written in the language understand by the employee.</p> <p>i. E11163 ii. E10932</p>	<p>Complied</p>

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		iii. E11040 iv. E10699 v. E10033 vi. E11028 vii. E00765 viii. E10010 ix. P10024 x. E10104	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. - Major compliance -	The estate record the employee attendance, working hours and overtime through Pocket Checkroll System updated by Field Supervisor on daily basis. The check roll has the information about attendance, type of work and overtime of every worker. Additionally, overtime work were recorded in Work Overtime Form for monitoring purpose.	Complied
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance -	Normal working hours is 8 hours from 0530 hrs to 1330 hrs with 30 minutes break from 1000 hrs to 1030 hrs. Working hours and breaks were found to be in line with the legal requirement.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	The estate distributed the Payslip to the employee during the payment day. Verified during document review the normal days' work and overtime hours were tallied with the Punch Card. All payment were as	Major NC

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator	Assessment Findings	Compliance
<p>- Major compliance -</p>	<p>per Minimum Wage Order 2016 and the Minimum Wages Order 2018. Sighted the Payslip for the month of November 2018, December 2018, January 2019 and February 2019 for sampled employee as follows:</p> <ul style="list-style-type: none"> i. E11163 ii. E10932 iii. E11040 iv. E10699 v. E10033 vi. E11028 vii. E00765 viii. E10010 ix. P10024 x. E10104 <p>2 out of 10 workers sampled was found that deduction was made to the FFB Checker (Employee No. P10024 and E10104) without any consent obtained from the authority for the penalty of sending unripe FFB to mill. Seen the deduction under category of Utilities (A. Deduction) for November 2018 and February 2019.</p> <p>Confirmed with the management that this was their practice to deduct FFB Checker if no proper segregation was made for unripe and ripe FFB</p>	

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
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 -	The estate management has provided benefits all the employee and dependents with basic amenities such as football field, badminton court, Crèche and place of worship. For medical care, the management has established Estate Clinics with Health Assistant.	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 employee were provided with housing quarters with basic amenities such as football field, badminton court, Creche, place of worship and estate clinic. The water and electricity were supply to all employee for free. Housing complex inspection was conducted on weekly basis as per the Workers' Minimum Standards Housing and Amenities Act 1990. Sighted the records for linesite inspection conducted by HA for the month of November, December 2018, January and February 2019 recorded in the Linesite Inspection Logbook.	Complied
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Genting Plantation has established Sexual Harassment Policy signed by the Chief Operating Officer dated 3/8/2009. The company committed to strive for harassment free environment as per Code of Practice on Prevention and Eradication of Sexual Harassment in the Workplace, issued by the Ministry of Human Resource Malaysia (1999)	Complied
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective	Genting Plantation employee are allow to form and join any Legal Trade Union as stated in the Social Policy established and signed by the President and Chief Operating Officer dated 22/6/2015.	Complied

Criterion / Indicator		Assessment Findings	Compliance										
	<p>bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>												
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>Genting Plantations has established Social Policy incorporating the Labour and Human Rights Requirement signed by the President and Chief Operating Officer on 22/6/2015. In the policy stated the company commitment not to use child labour.</p> <p>Reviewed the list of workers documented in the Labour Master/Out-turn as at February 2019 and Employment contract, all workers employed in the mill are above minimum age of 18 years old.</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 annual training program has been established and significantly covers all aspects of the MSPO/RSPO requirements. There were also additional subjects including the estate operating procedures, parameters, vehicles maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects. The program mainly covers both requirement of the estates and mill in the CU. The subjects for the training are issued and assisted by the SD personnel. The following topics included in the annual training program 2019 among others are extracted below;</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td></td> <td>(Estate) subject</td> <td colspan="3">schedule</td> </tr> <tr> <td></td> <td></td> <td>1-4</td> <td>5-9</td> <td>9-12</td> </tr> </table>		(Estate) subject	schedule					1-4	5-9	9-12	Complied
	(Estate) subject	schedule											
		1-4	5-9	9-12									

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings					Compliance
		1	Requirement ISO 9001/14001/18001	/			
		2	ESH policy objective, target & program	/			
		3	New FW – procedure	/			
		4	Duties of production supervisor	/			
		5	ESH role & function	/			
		6	Competency, training & awareness	/			
		7	ERP procedure and evacuation		/		
		8	Legal & other requirement		/		
		9	Permit - work/handling tools equipment	/			
		10	HIRARC & EAI		/		
		11	Non Conformity Corrective preventive action		/		
		12	Complaint & grievance procedure		/		
		13	SOP & ECP for individual procedure		/		
		14	PPE adherence		/		
		15	OER project – standing instruction			/	
		16	Scheduled waste management			/	
		17	Supplier selection & evaluation		/		
		18	Process monitoring & WA reporting			/	
		19	Noise training			/	
		20	Electrical main switch board			/	

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>	<p>Similar methods for identifying the training needs are used in all the estate. The details of the training needs include categories of;</p> <ul style="list-style-type: none"> a) job descriptions, b) sections, c) Employees' group. <p>Included in this program are subjects related to;</p> <ul style="list-style-type: none"> a) environment e.g. environmental, safety & health policy, b) scheduled waste management, c) environmental responsibility, HCV & Biodiversity training, d) field activities/operations, e) equipment handling, vehicles maintenance etc 	Complied																																				
4.4.6.3	<p>A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>The estate training is organized during the daily briefing prior to work commencement. Mainly the issues discussed / briefed were related to estate operations, environmental and safety compliance. These training records are maintained in a separate book and were sighted during the audit.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>5/3/19</td> <td>Fire Drill / Briefing</td> <td>Entire</td> </tr> <tr> <td>2</td> <td>5/3/19</td> <td>SOP Weeding / HIRARC</td> <td>10</td> </tr> <tr> <td>3</td> <td>4/3/19</td> <td>Company Policies Briefing</td> <td>entire</td> </tr> <tr> <td>4</td> <td>1/3/19</td> <td>Tractors driving SOP</td> <td>10</td> </tr> <tr> <td>5</td> <td>21/2/19</td> <td>Spraying SOP</td> <td>10</td> </tr> <tr> <td>6</td> <td>21/2/19</td> <td>Nursery Operations</td> <td>10</td> </tr> <tr> <td>7</td> <td>20/2/19</td> <td>Harvesting SOP</td> <td>30</td> </tr> <tr> <td>8</td> <td>20/2/19</td> <td>Fire Drill</td> <td>Entire</td> </tr> </tbody> </table>		Date	Subject	Attendees	1	5/3/19	Fire Drill / Briefing	Entire	2	5/3/19	SOP Weeding / HIRARC	10	3	4/3/19	Company Policies Briefing	entire	4	1/3/19	Tractors driving SOP	10	5	21/2/19	Spraying SOP	10	6	21/2/19	Nursery Operations	10	7	20/2/19	Harvesting SOP	30	8	20/2/19	Fire Drill	Entire	Minor NC
	Date	Subject	Attendees																																				
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5	21/2/19	Spraying SOP	10																																				
6	21/2/19	Nursery Operations	10																																				
7	20/2/19	Harvesting SOP	30																																				
8	20/2/19	Fire Drill	Entire																																				

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance		
		9	19/2/19	Rat Baiting	13			
		10	18/2/19	Petron Lubes Product	21			
		11	15/2/19	Harvesting SOP	30			
		12	15/2/19	Machinery safe handlings	13			
		13	15/2/19	Pesticides Handlings	30			
		14	12/2/19	Chemical spraying	30			
		15	30/1/19	First Aid Kit & ERP handlings	30			
		16	9/3/19	IPM management	15			
		17	28/2/19	Riparian Zone Protection	19			
		18	19/2/19	Protection of HCV riparian zone	19			
		19	18/2/19	Non-fertilizer application riparian area	13			
		20	12/2/19	Riparian zone protection from chemical	7			
		21	6/3/18	Spraying activities SOP	30			
		22	9/3/18	Riparian Zone protection	28			
		23	23/10/18	New FW – Induction Program	5			
		24	19/9/18	New FW – Induction Program	5			
		25	21/8/18	New FW – Induction Program	4			
		<p>During the site visit block 67 P20101 13/3/19 there was less understanding of the peat soil management An interview with a staff on 14/3/19 revealed that the opportunity provided in the whistle blowing policy was unable to be understood. Hence an NCR is raised.</p>						

Criterion / Indicator	Assessment Findings	Compliance	
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	<p>An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>The Group Environmental Policy had been established and implemented for all Mills and Estates. The policy was signed by the President / Chief Operating Officer of <i>Genting Plantations Bhd</i> dated 05 Oct 2009 and displayed prominently on notice boards in English and local language <i>Bahasa Malaysia</i>. The Policy is implemented along with other Policies through the OSH activities by the on-site Safety Officers and monitored by OSH/Sustainability Unit from Head Office. Included in the Policy among others are the following commitment;</p> <ul style="list-style-type: none"> a) Commitment and protection of the environment according to the applicable laws. b) Establishment of environmental management plan developed from results of aspect and impact analysis, mitigation, monitoring plans and records of implementation with timelines. c) Continual improvement program d) Awareness through training / briefing program & session to all employees and stakeholders. <p>During interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the basic objectives and intention of the Policy.</p>	<p>Complied</p>
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> a) An environmental policy and objectives; 	<p>The Environmental Policy was established, signed by President and Chief Operating Officer on 5th October 2009. The policy was communicated to the employees through the briefing during muster and training ad hoc basis.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>b) The aspects and impacts analysis of all operations.</p> <p>- Major compliance -</p>	<p>The aspects and impacts had been provided in <i>the Environmental Aspects And Impacts And Evaluation Of Significance 2019 Document no GSPE/EAI/5.1</i> reviewed in Feb 2019 compiled internally by the Sustainability Department The analysis among others had covered the following activities;</p> <ul style="list-style-type: none"> a) Harvesting / weeding / fertilizer application b) Mulching / road upkeep / ramp c) Workshop / chemical store d) Lubricant store / fertiliser store e) Oil palm thinning f) Building construction g) Drainage/nursery/replanting h) EFB mulching i) Impact of field operations activities towards environmental j) Identification of riparian zone k) All the relevant positive/negative impact & mitigation plan, 	
<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 Environmental improvement and management plan was established at GSPE (dated 9/3/2018) to include surface water runoff, water quality, chemical application, air quality, zero burning, fertilizer application and waste management.</p> <p>All the mitigation plans/objectives were established to mitigate the pollution identified. Among others, construction of terraces, planting of leguminous cover crop, construction of road site pit, clear marking for buffer one area, chemical reduction, zero burning policy, avoid</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings			Compliance																
		fertilizer application close to waterways, proper landfill site and recyclable waste.																			
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	<p>The environmental improvement plans are identified <i>the Environmental Impact Assessment After Planting 2018</i> having details of mitigation of the negative impacts. They are summarized and shown below;</p> <table border="1"> <thead> <tr> <th></th> <th>Activities</th> <th>Impacts</th> <th>Mitigation plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>harvesting</td> <td>Promote positive impact to soil structure through biomass frond & EFB mulching.</td> <td>Practice proper frond stacking. EFB applied to improve nutrient & biomass</td> </tr> <tr> <td>2</td> <td>weeding</td> <td>Negative impact as polluting the soil with usage of chemicals.</td> <td>Dosage of chemicals is monitored & calibrated. Cattle integration introduced to reduce reliance of chemical.</td> </tr> <tr> <td>3</td> <td>Manuring</td> <td>Over usage of chemical & fertilizer affecting soil toxicity causing leaching /wash off.</td> <td>Identify buffer zones and to prevent leaching of fertilizer and chemicals. Application along frond stacking rows.</td> </tr> </tbody> </table>				Activities	Impacts	Mitigation plan	1	harvesting	Promote positive impact to soil structure through biomass frond & EFB mulching.	Practice proper frond stacking. EFB applied to improve nutrient & biomass	2	weeding	Negative impact as polluting the soil with usage of chemicals.	Dosage of chemicals is monitored & calibrated. Cattle integration introduced to reduce reliance of chemical.	3	Manuring	Over usage of chemical & fertilizer affecting soil toxicity causing leaching /wash off.	Identify buffer zones and to prevent leaching of fertilizer and chemicals. Application along frond stacking rows.	Complied
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**MSPO Public Summary Report
Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings				Compliance																																											
		4	Road upkeep	Damages through grading and chambering	Water collected at drain pits is collected to maximize moisture of nearest palm.																																												
		5	Loading Bay	FFB transportation of lorries in minimizing leakages of fuel	Education to drivers and monitoring of vehicles movements.																																												
		6	Workshop	Spillage to prevent pollution	Availability of spill kit and health surveillance for welding personnel.																																												
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 -	<p>The 2019 training program has included the following subject in relation to the environmental education and awareness.</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">(Estate) subject</th> <th colspan="3">schedule</th> </tr> <tr> <th>1-4</th> <th>5-9</th> <th>9-12</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Requirement ISO 9001/14001/18001</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>2</td> <td>ESH policy objective, target & program</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>3</td> <td>ESH role & function</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>4</td> <td>ERP procedure and evacuation</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>5</td> <td>Legal & other requirement</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>6</td> <td>HIRARC & EAI</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>7</td> <td>Scheduled waste management</td> <td></td> <td></td> <td>/</td> </tr> </tbody> </table>					(Estate) subject	schedule			1-4	5-9	9-12	1	Requirement ISO 9001/14001/18001	/			2	ESH policy objective, target & program	/			3	ESH role & function	/			4	ERP procedure and evacuation		/		5	Legal & other requirement		/		6	HIRARC & EAI		/		7	Scheduled waste management			/	Complied
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Criterion / Indicator		Assessment Findings	Compliance																																
4.5.1.6	<p>Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>Discussions on environmental issues were discussed during the environmental meeting scheduled annually. Minutes of meeting dated 04/5/2018 chaired by the Estate Manager was sighted and verified. Mainly the discussion focussed on the scheduled waste and domestic waste handlings.</p> <p>Hence the NCR 1615-282-201803-M2 raised in the 2018 audit is therefore closed and concluded.</p>	Complied																																
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																																			
4.5.2.1	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p>- Major compliance -</p>	<p>The estate records the following 2018 data and tabulated the ratio against the FFB produced to determine the efficiency of their operations;</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Diesel L</th> <th>FFB mt</th> <th>Diesel L / FFB mt</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>7484</td> <td>8230</td> <td>0.91</td> </tr> <tr> <td>Feb</td> <td>6832</td> <td>6205</td> <td>1.1</td> </tr> <tr> <td>Mac</td> <td>7521</td> <td>5879</td> <td>1.28</td> </tr> <tr> <td>April</td> <td>6904</td> <td>5953</td> <td>1.16</td> </tr> <tr> <td>May</td> <td>6396</td> <td>5532</td> <td>1.16</td> </tr> <tr> <td>June</td> <td>5818</td> <td>4643</td> <td>1.25</td> </tr> <tr> <td>July</td> <td>7928</td> <td>5560</td> <td>1.43</td> </tr> </tbody> </table>	Month	Diesel L	FFB mt	Diesel L / FFB mt	Jan	7484	8230	0.91	Feb	6832	6205	1.1	Mac	7521	5879	1.28	April	6904	5953	1.16	May	6396	5532	1.16	June	5818	4643	1.25	July	7928	5560	1.43	Complied
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**MSPO Public Summary Report
Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings				Compliance
		Aug	7432	7334	1.01	
		Sept	8639	9861	0.88	
		Oct	8877	10304	0.86	
		Nov	10261	10885	0.94	
		Dec	10055	10083	1.00	
		Total	94147	90471	1.04	
			Year	Diesel L/mtFFB		
		1	2015	1.19		
		2	2016	1.05		
		3	2017	1.02		
		4	2018	1.04		
		<p>There has been initiative by the management in reducing the diesoline consumption through the following</p> <ul style="list-style-type: none"> a) Manual grass cutting reducing the tractor running hours. b) Optimum running hours of tractors. c) Scheduled maintenance of tractors. 				
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.	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. Refer details as per indicator 4.5.2.1				Complied

Criterion / Indicator		Assessment Findings	Compliance																
	- Major compliance -	above. Figures were extracted from the diesel issuance of estate diesel tank.																	
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	There was no opportunity to use renewable energy (<i>shell/fibre/EFB</i>) in the estate with the present technology and facilities within the industry.	Complied																
Criterion 4.5.3: Waste management and disposal																			
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	<p>All waste and pollution are identified and documented in the Waste Management Action Plan. The compilation for 2019 was made at by the Sustainability Department applicable to both estates and mills. Details of waste generated from the estates and mill operations among others are shown below;</p> <table border="1"> <thead> <tr> <th>Type of waste</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>Domestic waste rubbish</td> <td>Line sites, office, workshop, store,</td> </tr> <tr> <td>Industrial waste-fertilizer bags</td> <td>Empty bags store</td> </tr> <tr> <td>Scrap metal</td> <td>workshop</td> </tr> <tr> <td>SW 404 Clinical waste</td> <td>clinic</td> </tr> <tr> <td>SW rags, plastics, filters</td> <td>Workshop</td> </tr> <tr> <td>Spent lubricant & hydraulic oil</td> <td>Workshop</td> </tr> <tr> <td>Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW</td> <td>Scheduled waste store</td> </tr> </tbody> </table>	Type of waste	Location	Domestic waste rubbish	Line sites, office, workshop, store,	Industrial waste-fertilizer bags	Empty bags store	Scrap metal	workshop	SW 404 Clinical waste	clinic	SW rags, plastics, filters	Workshop	Spent lubricant & hydraulic oil	Workshop	Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW	Scheduled waste store	Complied
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MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings			Compliance
<p>4.5.3.2</p> <p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p>- Major compliance -</p>	<p>The disposal/recycling of waste generated by the estates are made as follows;</p>			<p>Complied</p>	
	Type of waste	Location	Action to be taken		
	Domestic waste rubbish	Line sites, office, workshop, store,	Collection/disposal 2x/week to the estate designated landfill.		
	Industrial waste-fertilizer bags	Empty bags store	Inventory of bags, reuse for LF collection, sell to appointed contractor for surplus quantity.		
	Scrap metal	workshop	Inventory maintained, tender at zone level for sale to licensed contractors		
	SW 404 Clinical waste	clinic	Inventory maintained. Storage in sharp bin in clinic. Disposal through VMO clinic.		
	SW rags, plastics, filters,	Workshop	Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor.		
	Spent lubricant & hydraulic oil	Workshop	Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor		
	Disposed containers, bags, equipment	Scheduled waste store	Inventory maintained. Storage in SW store. All containers are labelled. Empty containers collected by authorized vendor..		

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings			Compliance
		contaminated with chemicals, pesticides, SW			
4.5.3.3	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by Head Office personnel and implemented in all estates and mills for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows;</p> <ul style="list-style-type: none"> a) Management of class 2 (and higher) chemical containers. b) Management of fertilizer bags <p>This document was established on 13/8/2009 (OSH Manual) and 01/8/2013 (Sustainability Manual) and remains effective for practice in all estates and mills.</p> <p>There was no records of inventory and disposal to the authorised vendor for the disposal of the SW 410 (used PPE) hence an NCR is raised.</p>			Major NC
4.5.3.4	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the</p>	<p>The guidelines and practice for handling empty pesticides containers are as established in the operational control procedure established as given in 4.5.3.3.</p> <ul style="list-style-type: none"> a) All class 2 and above containers are tripled rinsed and holes punctured at the bottom only if the waste generator is to dispose as non-scheduled waste. 			Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance												
	national programme on recycling of used HDPE pesticide containers. - Major compliance -	b) Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process. These guidelines are based on Department Of Agriculture ref 91/120/038/014 dated 7/11/2002. During the site visit this has been adhered mainly containers are tripled rinsed and holes punctured at the container base.													
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	The domestic waste was disposed as per <i>SOP Landfill and domestic waste management, SMP-GPB-12, Rev:01, Dated 1/12/2014</i> . The locations of the landfill areas are at field no GSPE block 12 and block 84B.	Complied												
Criterion 4.5.4: Reduction of pollution and emission															
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	<p>The Environmental Improvement and Management plan was established at GSPE dated 4/3/2019. The following issues and mitigation program have been identified.</p> <table border="1"> <thead> <tr> <th></th> <th>Issues</th> <th>Mitigation program</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>surface water runoff</td> <td>construction of terraces,</td> </tr> <tr> <td>2</td> <td>Water quality</td> <td>avoid fertilizer application close to waterways clear marking for buffer one area,</td> </tr> <tr> <td>3</td> <td>chemical application</td> <td>planting of leguminous cover crop chemical reduction</td> </tr> </tbody> </table>		Issues	Mitigation program	1	surface water runoff	construction of terraces,	2	Water quality	avoid fertilizer application close to waterways clear marking for buffer one area,	3	chemical application	planting of leguminous cover crop chemical reduction	Complied
	Issues	Mitigation program													
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**MSPO Public Summary Report
Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings		Compliance												
		4	air quality	zero burning policy,												
		5	zero burning	zero burning policy, landfill site & recyclable waste												
		6	Fertilizer application	fertilizer application close to waterways												
		7	Waste management.	proper landfill site and recyclable waste												
		<p>The GHG emissions due to the operations is identified and recorded in the palm GHG version 3.01. These GHG calculations were done as per certification unit basics. Summary emissions:</p> <table border="1"> <thead> <tr> <th></th> <th>Details</th> <th>Value</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Total emission</td> <td>90357.94</td> </tr> <tr> <td>2</td> <td>tCO2 e/ha</td> <td>23.12</td> </tr> <tr> <td>3</td> <td>tCO2 e/t FFB.</td> <td>1.01</td> </tr> </tbody> </table> <p>The management has submitted evidence of the revised EAI Assessment where the environmental impact "Global warming/GHG" has been included. Copy of minutes of amended EAI Procedure (SMP-GPB-2) was sighted and verified.</p> <p>Hence the NCR 1615-282-201803-M3 raised in 4.5.4.1 is closed and concluded.</p>			Details	Value	1	Total emission	90357.94	2	tCO2 e/ha	23.12	3	tCO2 e/t FFB.	1.01	
	Details	Value														
1	Total emission	90357.94														
2	tCO2 e/ha	23.12														
3	tCO2 e/t FFB.	1.01														

Criterion / Indicator		Assessment Findings	Compliance												
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The action plan has been elaborated in 4.5.4.1 above.	Complied												
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. 	<p>The Water Management Plan for the estates has been established. with latest review made on 1/1/2019. The plan emphasized on the following areas.</p> <ul style="list-style-type: none"> a) Water source b) Efficient use of water c) Renewability of water source d) Avoidance of surface and ground water contamination <p>Details of the action plan and monitoring among others are tabled as follows;</p> <table border="1"> <thead> <tr> <th></th> <th colspan="2">Areas of concerns</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water source</td> <td>Water from catchment pond</td> <td>Supply to residential areas /complex for all divisions Use in nursery and irrigation projects</td> </tr> <tr> <td>2</td> <td>Efficient use of water</td> <td>Residential areas Optimize usage & reduce wastage</td> <td>Monitoring of pipes leakages Spraying pump maintenance</td> </tr> </tbody> </table>		Areas of concerns		Action Plan	1	Water source	Water from catchment pond	Supply to residential areas /complex for all divisions Use in nursery and irrigation projects	2	Efficient use of water	Residential areas Optimize usage & reduce wastage	Monitoring of pipes leakages Spraying pump maintenance	Complied
	Areas of concerns		Action Plan												
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MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance
	e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. - Major compliance -			Education/traini ng	Promote water conservation & awareness among employees	
		3	Renewability water source	Rain water capture at catchment	Monitoring of pond level	
				Rain water harvest	Collection and usage at workshop	
		4	Avoidance of surface/grou nd water contaminatio n	Sewage and septic tank	To ensure no leakage of sewage/septic tank functioning properly/cover available	
				Rubbish collection at line site	Collection 2x/week Landfill located 400m from residential areas. Recycling practices	
				Drainage system	Free flow drains & scheduled maintenance	
				Water pollution	Wash from chemical bays collected in sump for recycling Trap for oil constructed	
				Water quality	Sampling of water samples at various fields identified for river water sample. Establishment of riparian zone along natural water ways. Maintain the riparian buffer zone during replanting	

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings			Compliance																		
		5	Others	Flood /water logging areas	Monitoring of rainfall, Desilting drain program Monitoring of water level using yard stick Construction of MCP																		
		<p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones as commonly practiced within the industry. The buffer zones established are as follows;</p> <table border="1"> <thead> <tr> <th>1</th> <th>River width (Meters)</th> <th>Buffer Zone (Meters)</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>>40</td> <td>50</td> </tr> <tr> <td>3</td> <td>20-40</td> <td>40</td> </tr> <tr> <td>4</td> <td>10-20</td> <td>20</td> </tr> <tr> <td>5</td> <td>5-10</td> <td>10</td> </tr> <tr> <td>6</td> <td><5</td> <td>5</td> </tr> </tbody> </table>				1	River width (Meters)	Buffer Zone (Meters)	2	>40	50	3	20-40	40	4	10-20	20	5	5-10	10	6	<5	5
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4	10-20	20																					
5	5-10	10																					
6	<5	5																					
4.5.5.2	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p>- Minor compliance -</p>	<p>This is in compliance by the estate. This requirement is also audited internally by the Sustainability Department personnel. During the field visit no construction of such was observed.</p>			Complied																		

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
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 -	During the site visit practices of water harvesting are noted mainly constructed on flat areas in both estates. There were construction of WCP = Water Conservation Pit ratio of 1 ha to 34 points. Road side pits were also available at every 3 palm rows, to divert in event of water overflowing and also to benefit the nearest palm at the pit end to obtain additional moisture. This is part of the common practices introduced within the Group Agriculture Procedures.	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 -	There was an assessment made namely "Inventory on HCV sites within <i>Genting Plantation Bhd Group Estates (Sabah Region 1)</i> conducted by <i>M/S S.K. Yap Forestry and Landscape Advisory Services on Oct 2009 – July 2010</i> . The report concluded only HCV 4.2 and HCV 6 were identified at the estate <i>Genting Sabapalm Estate at Labuk and Bangkawat</i> . There were also presence of rivers and burial grounds (Muslim & Christian) for local communities within the estate.	Complied
4.5.6.2	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:	There is no RTE or high biodiversity value at GSPE except for reported observation of estuarine crocodiles found at <i>Sg Labuk River</i> . The	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	<p>d) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>e) 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>management and monitoring plan for HCV areas was established, last reviewed on 01/3/19. There were displays of signage made at site i.e.</p> <p>a) No fishing, no manuring, b) no spraying, no slashing, no swimming c) Muslim & Christian cemetery signage).</p>	
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>The management and monitoring plan for HCV areas was established with last review on 1/3/19. The implementation of signage was sighted</p> <p>a) No fishing, no manuring, b) no spraying, no slashing, no swimming c) Muslim & Christian cemetery signage).</p>	Complied
Criterion 4.5.7: Zero burning practices			
4.5.7.1	<p>Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.</p> <p>- Major compliance -</p>	<p>The Group policy of "Zero open burning" is enforced since July 2008. The operating units adhered to the policy of "Zero open burning" for any replanting as adherence to the Compliance in the industry. From field visits and interviews with the workers there is no open burning being practiced in the estate</p>	Complied
4.5.7.2	<p>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.</p> <p>- Major compliance -</p>	<p>N/A. Details in 4.5.7.1 above</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	N/A. Details in 4.5.7.1 above	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 -	This is included in the specification of work orders in event of land preparation during a replanting. It is a standard practice in Genting Group and within the Industry. However there are variations of practices between inland and coastal estates. Trunks are felled and chipped without having to shred and windrowed in certain conditions. Adjustment of work requirement are finalised from the directive of the Regional Office/Head Office.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	The estate operations are guided by the following manuals. <ul style="list-style-type: none"> a) Genting Plantations Oil Palm Manual OPM issued on 9/11/99 updated June 2013. <ul style="list-style-type: none"> - Land preparation/nursery/planting/soil conservation/ - Pest & Disease/weeding/fertiliser application/harvesting - Managing difficult soils/crop forecast b) Sustainability Management Procedure Manual 1/8/13 revised in 7/2/19. c) OSH Manual dated 1/1/2010. d) Environmental Control Procedure – 01/9/2018 	Complied

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

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> e) Store Operating Manual – 2014 f) Standard Operating Procedure Malaysia Estates rev 2 (Dec 10) rev 3 (Oct 13) g) Jobs description - 2012 <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>	
4.6.1.2	<p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p>- Major compliance -</p>	<p>The estates construct terraces at slope area of more than 6 degree. Planting of cover crop are made to retain the soil structure and 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>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	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.	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 estate audited possessed a similar budget format to the mill. Inclusive there is also a 5-year budget/forecast financial plan 2019-2023 allocating categories among others; <ul style="list-style-type: none"> a) Crop yielding area b) Mature cost <ul style="list-style-type: none"> - Weeding/drainage/pest/ - Supplying/roads/bridges/paths/TAS Road/ - Terracing/pruning/sanitation c) Manuring/harvesting & Collection/Weeding d) Transportation /depreciation/General Charges e) Cost/ha & cost /mt FFB f) CAPEX Separately the cost of immature areas is also shown which among others comprises of the following items; <ul style="list-style-type: none"> a) Labour statement / Allocation of wages / Labour benefit summary b) Yield statement oil palm c) Summary of vehicle and running schedule / Job allocation for vehicles 	Complied

Criterion / Indicator		Assessment Findings	Compliance																												
		<p>d) Summary of workshop running schedule e) Summary of budget f) Summary of general charges g) CAPEX The five years planning horizon 2019-2023 is available.</p> <table border="1"> <thead> <tr> <th></th> <th></th> <th>Fcast 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>3446.97</td> <td>3452.9 2</td> <td>3681.1 1</td> <td>3425.6 3</td> <td>3582.5 0</td> </tr> <tr> <td>2</td> <td>FFB / Mt</td> <td>93137</td> <td>95720</td> <td>102408</td> <td>91612</td> <td>93927</td> </tr> <tr> <td>3</td> <td>YPH</td> <td>27.02</td> <td>27.72</td> <td>27.82</td> <td>26.74</td> <td>26.22</td> </tr> </tbody> </table>			Fcast 2019	2020	2021	2022	2023	1	Mature Ha	3446.97	3452.9 2	3681.1 1	3425.6 3	3582.5 0	2	FFB / Mt	93137	95720	102408	91612	93927	3	YPH	27.02	27.72	27.82	26.74	26.22	
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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 replanting programs for the estate are compiled as follows. The program is reviewable on an annual basis which is subject to amendment. All figures in hectares otherwise stated.</p> <table border="1"> <thead> <tr> <th>No</th> <th>Year</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Ha</td> <td>229</td> <td>94</td> <td>0</td> <td>154</td> <td>101</td> </tr> </tbody> </table> <p>Sizes of fields identified for replanting varies subject to factors i.e hilly, yield etc. All replanting program and planning in all the Group Estates are monitored by the Head Office. Assistance and visits are performed by SVP/GM for the approval of hectares, stand per ha etc.</p>	No	Year	2019	2020	2021	2022	2023	1	Ha	229	94	0	154	101	Complied														
No	Year	2019	2020	2021	2022	2023																									
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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>This requirement i.e. crop material, crop projection, yield, production cost are available. It is provided in the business management plan shown in item 4.6.2.1 above. The financial indicators: cost benefits, discounted cash flow, return on investment details are managed and kept in confidentiality at the Head Office level. The estates managed the financial elements through guidance of the approved budget. Deviations are sought to the higher superior level for any additional vote and projects if necessary.</p>	Complied
4.6.2.4	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p> <p>- Major compliance -</p>	<p>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>Pricing mechanism for product and services was normally done through opened tender or comparison of quotations. Agreed price</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	were stated in the contract agreement signed by the company representative and contractors.	
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	The contracts have been detailed out the pricing and the conditions. Payment was made on timely manner as per contract agreement. Sighted the evidence of payment to the contractors through Schedule of Work Completed. Refer SWOC reference no as follows: i. GSPE/K/F1901001 ii. GSPE/S/G18120091 iii. GSPE/KW/F1901003	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	Genting Plantation has included terms of Compliance to MSPO Standards in the contract agreement for all contractors. Sighted the contract agreement for Oriental Phase Enterprise, Metro Bayan Sdn. Bhd and Hon Kim Enterprise.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	The contractors has signed contract agreement before provide the service to the company. The copy of the agreement were available in the office for review. Sighted the contract agreement Oriental Phase Enterprise, Metro Bayan Sdn. Bhd and Hon Kim Enterprise.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	Genting Plantation has agreed for BSI auditors to verify the assessment through a physical inspection if required.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.4.4	<p>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.</p> <p>- Major compliance -</p>	<p>The estate management has established mechanism to monitor the contractor performance. Sighted the General Work Order Requisition and Schedule of Work Completed as document to monitor the completed task done by the contractor. Interview with contractors showed that they understand the evaluation criteria and agreed with the terms of the signed contract agreements.</p>	Complied
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			
4.7.1.1	<p>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.</p> <p>- Major compliance -</p>	Not Applicable	NA
4.7.1.2	<p>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.</p> <p>- Major compliance -</p>	Not Applicable	NA
Criterion 4.7.2: Peat Land			

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
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 -	Not Applicable	NA
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 -	Not Applicable	NA
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	Not Applicable	NA
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 -	Not Applicable	NA
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be	Not Applicable	NA

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -		
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 -	Not Applicable	NA
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	Not Applicable	NA
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 -	Not Applicable	NA
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.	Not Applicable	NA

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	Not Applicable	NA
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 -	Not Applicable	NA
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	Not Applicable	NA
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 -	Not Applicable	NA

Criterion / Indicator		Assessment Findings	Compliance
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 -	Not Applicable	NA
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	Not Applicable	NA
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	Not Applicable	NA
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	Not Applicable	NA
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 -	Not Applicable	NA

Malaysian Sustainable Palm Oil Part 4: General Principles for Palm Oil Mills

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 -	Genting Plantation has established MSPO Policy signed by the President and Chief Operating Officer dated 18/3/2014	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 -	The established policy has emphasized on the commitment to continual Improvement within the journey towards achieving sustainable palm oil.	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 -	Sustainability Department has conducted the internal audit on annually basis. Any non-conformities found during the internal audit has to be addressed by the operating units and CAP need to be established. Latest internal audit was conducted on 24-25/1/2019 with 2 auditors. Audit covered both documentation and operation for the mill for RSPO and MSPO requirements. Issues raised during the internal audit has been addressed by the mill management.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of	Genting Plantation has established the SOP for internal audit and documented in Sustainability Management Procedure Manual under	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	section Sustainability Internal Audit. Refer document no. SMP-GPB-03. The procedure was mentioned about the audit criteria, audit plan, the role of Lead Auditor, Team member and etc. Corrective action plan has been developed with root cause and preventive action of the non-conformities identified.	
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The mill keep records for all internal audit conducted and action taken for review. Sighted the internal audit report dated 14/2/2019 which conducted on 24-25/1/2019.	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 -	The management review was conducted once a year as per SOP established and documented in the Sustainability Management Procedure Manual under section Management Review refer document no SMP-GPB-06 rev 1 dated 25/5/2018. Latest Management Review Meeting was conducted on 7/3/2019. The management review discuss: i. Changes, improvement or modification of the Sustainability Management System ii. Complaints and Grievances iii. Stakeholder meeting iv. Green house value v. Review on resource and training requirements	Complied

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

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> vi. Review of Sustainability Policy and its objectives status vii. Review of effectiveness in achieving quality, environmental, social, safety and health viii. Compliance status on legal and other requirements ix. Any other matters x. Preventive and corrective actions xi. Recommendation for improvement xii. Customer feedbacks xiii. Follow up action from management review xiv. Changes that could affect the management system <p>Sighted the minutes meeting of the meeting conducted. In the minutes stated the agenda discussed, matters arising, action takes, person in charge and status. Issue raised during the meeting been addressed by the mill management.</p>	
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>The mill has established Continuous Improvement Plan. The plan stated the issue, objective, action plan, monitoring/verification, person responsible and status. Issue identified as follows:</p> <ul style="list-style-type: none"> i. Environmental impacts ii. Waste reduction 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		iii. Pollution and greenhouse gas emission iv. Social impacts v. Encourage optimize the yield vi. Workers personal file vii. Water consumption and quality viii. Health and safety performance	
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	Continual improvement is demonstrated based on project initiated by mill management. The project focus mainly on cost saving and process losses minimization for each financial year.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	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. - Major compliance -	Genting Sabapalm 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. xv. Company annual report xvi. Group policies xvii. Reports related to environment i.e. EAI (Environmental Aspect Impact Assessment), EIA (environmental Impact	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Assessment etc.</p> <ul style="list-style-type: none"> xix. RSPO external audit reports xx. Pollution prevention plan xxi. Continuous improvement plan xxii. Complaints and grievances book and its procedure xxiii. Negotiation and compensation procedure xxiv. Sexual harassment procedure xxv. Estate/mill maps and land titles xxvi. Any reports or information related to HCV area xxvii. Any reports or information related to social i.e. SIA xxviii. RSPO internal audit report <p>This is addressed in its Sustainability Management Procedure Manual under section Procedures on Request and Responses. Refer document no. SMP-GPB-25, rev. 00, dated 14/8/2014.</p>	
4.2.1.2	<p>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.</p> <p>- Major compliance -</p>	<p>The management documents which are publicly available are mentioned in Indicator 4.2.1.1. Any request of information shall be recorded in GSOM's Enquiry Register Book. Based on the book, as at to-date, there has been no request for information from any stakeholders.</p>	Complied
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>Genting Plantations has established SOP for consultation and communication and documented in Sustainability Management</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		Procedure Manual under section Procedures for Consultation and Communication. Refer document no. SMP-GPB-17, rev. 02 dated 23/2/2018.	
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 -	The management has appointed the Senior Assistant Manager in charge as person responsible for consultation and communication with the relevant stakeholders as per appointment letter dated 14/2/2019 signed by the Vice President/General Manager Processing (Sabah)	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 mill has established records for all the stakeholders. Over 400 stakeholders identified and grouped into several groups such as Government Agencies, CPO and PK Transporters, Suppliers, Machineries Spares and Services and FFB Suppliers. Meeting with stakeholders conducted once a year as per SOP. Latest stakeholders meeting was conducted on 26/11/2018	Complied
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 -	Genting Plantation has established SOP for traceability and documented in Sustainability Management Procedure Manual under section Supply Chain and Traceability (mill). Refer document no. SMP-GPB-23 rev. 7 dated 24/8/2018.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The management monitored the compliance with the traceability system established through supply chain internal audit conducted.	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance		
		Latest internal audit was conducted on 24-25/1/2019 with 2 auditors. Issues raised during the internal audit has been addressed by the mill management.			
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	The mill management has appointed the 2 general clerk and 1 weighbridge clerk to maintain the traceability systems ape per appointment letter dated 1/9/2014, 1/12/2016 and 3/1/2019.	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: i. Mass Balance Worksheet – monthly input ii. Local Sales Delivery Advice (LSDA) iii. Incoming FFB Records iv. Outgoing CPO Records v. Outgoing PK Records	Complied		
4.3 Principle 3: Compliance to legal requirements					
Criterion 4.3.1 – Regulatory requirements					
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	<i>Genting Sabapalm Palm Oil Mill</i> continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and SD sustainability team. The licenses and permits governed by the Local, State and Federal authorities among others as shown below; <table border="1" data-bbox="1086 1359 1787 1390"> <tr> <td>License / Permits</td> <td>Validity /Ref no</td> </tr> </table>	License / Permits	Validity /Ref no	Complied
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MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings		Compliance																										
		<table border="1"> <tr> <td>1</td> <td>DOE no 001878</td> <td>1/7/18-30/6/19</td> </tr> <tr> <td>2</td> <td>MPOB license no 500002-804000</td> <td>1/11/18-31/10/19</td> </tr> <tr> <td>3</td> <td>Diesel permit SDK198/1979(SK)</td> <td>11/4/18-10/4/19</td> </tr> <tr> <td>4</td> <td>Water Tube Boiler PMD 10666</td> <td>8/6/18-8/7/19</td> </tr> <tr> <td>5</td> <td>Sterilizer no 1 PMT 56964</td> <td>8/6/18-8/7/19</td> </tr> <tr> <td>6</td> <td>Back Pressure receiver PMT 982</td> <td>8/6/18-8/7/19</td> </tr> <tr> <td>7</td> <td>Sterilizer no 3 PMT 56999</td> <td>8/6/18-8/7/19</td> </tr> <tr> <td>8</td> <td>Air receiver PMT 9418</td> <td>8/6/18-8/7/19</td> </tr> <tr> <td>9</td> <td>Fire certificate</td> <td>18/1/19-17/2/20</td> </tr> </table> <p>The mill operates under MPOB license no 5000-280-0000 issued for period of 01/11/18-31/10/19. The license provides entitlement of <i>menjual and mengalih</i> FFB with the total processed approved is 96000 mt.</p>	1	DOE no 001878	1/7/18-30/6/19	2	MPOB license no 500002-804000	1/11/18-31/10/19	3	Diesel permit SDK198/1979(SK)	11/4/18-10/4/19	4	Water Tube Boiler PMD 10666	8/6/18-8/7/19	5	Sterilizer no 1 PMT 56964	8/6/18-8/7/19	6	Back Pressure receiver PMT 982	8/6/18-8/7/19	7	Sterilizer no 3 PMT 56999	8/6/18-8/7/19	8	Air receiver PMT 9418	8/6/18-8/7/19	9	Fire certificate	18/1/19-17/2/20	
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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 Legal Requirements Register (LRR) covers all the necessary regulatory requirements. The LRR for was reviewed on 31/1/19. The list of applicable legal and other requirements was made available during the assessment and complied in the Sustainability Management Procedure Manual SMP-GPB-22 having revision no. 6. The list comprises of the following sections</p> <ul style="list-style-type: none"> d) Environment / Safety & Health / Social e) Best practices & other requirements f) International Standards Requirement <p>Among others the identified applicable laws and regulations relevant to its operations included the;</p> <ul style="list-style-type: none"> t) Environmental Quality Act 1974 and its Regulations, u) Factories and Machinery Act 1967 and its Regulations, 	Complied																											

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> v) Occupational Safety and Health Act 1994 and its Regulations, w) Pesticides Act, 1974, x) Worker’s Minimum Standards of Housing & Amenities Act, 1990. y) Wildlife conservation Act 2010 z) Malaysian Palm Oil Board 1998 aa) Holiday Act 1951 bb) Passport Act 1966 cc) Workers Union Act 1959 dd) Estate Hospital Assistants (Registration) Act 1965 ee) Petroleum (safety Measures) Act 1984 ff) Fire Services Act 1984 gg) Uniform Building By Laws 1986 hh) Weights And Measures Act 1972 (Act 71) (Amendment 1981) 	
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>The Sustainability Department SD, based Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills. SD which is based in <i>Wisma Genting</i> is responsible for tracking any changes to the Acts and Regulations. In addition, the SVP Processing (Malaysia) & Downstream Manufacturing also played a role in disseminating new Acts & Regulations to all the mills in the Group.</p> <ul style="list-style-type: none"> e) This was made via communication with the publisher of the documents. f) This mechanism was outlined in its procedure. g) The updating of the legal register is made on a periodical basis. 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>h) Changes in the legal register if any are communicated to the respective regions.</p> <p>The mill had entirely adopted the GPB established documented system for identifying, tracking, accessing and updating the legal requirements. It had ensured that all applicable legal requirements pertaining to MSPO are established, implemented and maintained. The latest revision on the LRR was made dated 31/1/19 on the following changes;</p> <ul style="list-style-type: none"> i) Minimum Wages Order 2018 j) Drainage and Irrigation Ordinance 1956 k) Sabah water resources enactment 2002 l) EIA Order 2005 m) Wildlife Conservation Enactment 1997 n) Forest Enactment 1968 (Sabah) o) Employment Insurance Scheme Act 2017 p) Sabah Labour Ordinance Cap 67, 1950 	
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>The Mill Manager appoints the Assistant Engineer <i>Mr Jude M.S</i> as the PIC for updating changes in laws at GSOM. Letter dated 01/1/18 was sighted and verified.</p> <p>The monitoring of the MPOB license against the approved volume was ineffective having the following the facts of the total FFB processed in the entire year (1/11/17 – 31/10/18) is 115793.57mt exceeding 19793.57mt equivalent to 20.61% of the approved quantity. Hence an NCR is raised</p>	Minor NC
Criterion 4.3.2 – Lands use rights			

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	The mill ensures that oil palm milling activities does not diminish the land use right of others by having the land titles and demarcation of boundary based on the titles.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	The mill operates on legal ownership of land. Details as follows; <ul style="list-style-type: none"> a) Land titles no 085109977 – Land Ordinance CAP 68 Section 109 Scheduled XVII. Plan no 08126934 6B JJ. b) Provisional lease no 236 dated 08/10/1889. c) District of <i>Labuk & Suguli</i> Locality Kampung Klagan <ul style="list-style-type: none"> - Geocode 866010000 /6856900000/6856810000 /685692000 d) Memorial no 115365, 00162676, 00153688 e) Period from 01/01/1987-31/12/2085. 	Complied
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 effluent ponds are located at a distance from the processing area as larger space is required. 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 -	No issues of land disputes recorded at the mill.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	No lands are encumbered by customary rights identified.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	No lands are encumbered by customary rights identified.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	No lands are encumbered by customary rights identified.	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 impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Genting Plantations has conducted social impact assessment for both Sabapalm Oil Mill and Sabapalm Estate and documented in Social Impact Assessment (SIA) & Human Rights Impact Assessment (HRIM) on 6-7/4/2017. The objective of the assessment was to assess change in social and environmental condition which subsequently have impacts on the people. The assessment has involved the participation of internal and external stakeholders. All the issues raised by the stakeholders during the assessment were recorded in the report.	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		The social impact assessment need to be re-assessed tentatively in July 2019 as per SOP Sustainability Management System Procedure under Section Social Management. Refer document no. SMP-GPB-32 rev 0 dated 18/1/2018.	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	Genting Plantations has established the SOP dealing with complaints and grievances and documented in Sustainability Management System Procedure under Section Complaints and Grievances procedure. Refer document no. SMP-GPB-19, Rev. 03 dated 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 mill has implemented Complaints/ Grievances Record Book to record any complaints and grievances. The complainants have acknowledged on the complaint form after actions have been taken. The system established was found to be effective in managing complaints raised.	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 -	The complaint/grievances form were available at the office. All the complaint/grievances were recorded in the complaint/grievances record books.	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 -	The internal and external stakeholders aware regarding the complaint/grievances procedure established as it was brief during stakeholder meeting. Sighted the latest minutes meeting with stakeholders conducted on 26/11/2018.	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 -	The mill maintain records for all complaints/grievances and action taken to address the complaints/grievances raised in Complaints/Grievances record books	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 -	The mill management has made contribution to the local communities such as provide job opportunity to local people. Besides, the management has supplied portable water to the villagers upon request. Additional time for electricity supply to the workers whenever there is an event/ function by workers.	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 -	The Safety Policy signed the President /Chief Operating Procedure dated 01/7/18. Therein containing among others the following; <ul style="list-style-type: none"> f) To maintain a safe and healthy working environment for all employees /others g) To comply with all applicable safety legislation, code of practice, requirement. h) Create awareness by providing all relevant information, WI, supervision and trainings to employees. i) Prevent accidents, injuries, and occupational illness as well as conduct investigations and take necessary steps/actions to ensure such accidents do not recur 	Complied

Criterion / Indicator		Assessment Findings	Compliance								
		j) All employees shall be responsible and accountable to achieve the abovementioned practices.									
4.4.4.2	<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; ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. 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>Briefings to employees on safety policy are made through training and briefing forums. In addition there were also briefings at muster ground being as refresher program for the employees. Safety procedures adherence are emphasised to the employees as part of the work culture. Content includes among others to prioritise safety, execute work safely, and adhere all safety rules and regulations and to target zero accident. Safety policy and targets were available on display board printed in both English & <i>Bahasa Malaysia</i>.</p> <p>The Mill had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following;</p> <ul style="list-style-type: none"> d) Change in work process e) Revision/changes in legislative requirement f) Occurrence of accidents <p>HIRARC for the mill was formalized on in 2010 with review made annually. The significant and routine activities for mill and estates were adequately covered with details as follows. HIRARC recently reviewed 16/2/19 made for the endorsement of the newly transferred Manager.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Subject</th> <th></th> <th>Subject</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Laboratory</td> <td>10</td> <td>Office</td> </tr> </tbody> </table>		Subject		Subject	1	Laboratory	10	Office	Complied
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MSPO Public Summary Report
Revision 0 (Aug 2017)

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<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>	<table border="1" data-bbox="1088 448 1749 820"> <tr><td>2</td><td>Excavator</td><td>11</td><td>Water treatment plant</td></tr> <tr><td>3</td><td>Sterilizer</td><td>12</td><td>Fabrication FFB cages</td></tr> <tr><td>4</td><td>Workshop</td><td>13</td><td>Heavy vehicles</td></tr> <tr><td>5</td><td>Security</td><td>14</td><td>Boiler</td></tr> <tr><td>6</td><td>Incinerator</td><td>15</td><td>clarification</td></tr> <tr><td>7</td><td>FFB grading</td><td>16</td><td>Electrical</td></tr> <tr><td>8</td><td>store</td><td>17</td><td>Effluent pond</td></tr> <tr><td>9</td><td>Tools & equipment</td><td>18</td><td>CPO/CPK despatch</td></tr> </table> <p>The mill provides training to the workers and staff exposed to pesticides and chemicals. The following training sessions among others were recorded.</p> <table border="1" data-bbox="1088 983 1845 1137"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>5-6/9/18</td> <td>Chemical spillage oil spillage ERP</td> <td>3</td> </tr> <tr> <td>2</td> <td>5/9/18</td> <td>SOP & SOM</td> <td>5</td> </tr> <tr> <td>3</td> <td>19/2/18</td> <td>Recycling program SW management</td> <td>entire</td> </tr> <tr> <td>4</td> <td>4/7/18</td> <td>Process station SOP & handling</td> <td>11</td> </tr> </tbody> </table> <p>Details of other training are available 4.4.6.1 (training and competency). OSH programs are also included. Common programs are initiated from HQ level e.g. OSH meeting, workplace inspection, inspection on PPE, training on MSPO/RSPO etc. The mill provides PPE to the employees relevant to the work handled by the workers. The list of PPE provided among others: General Workers/Workshop Personnel /others</p>	2	Excavator	11	Water treatment plant	3	Sterilizer	12	Fabrication FFB cages	4	Workshop	13	Heavy vehicles	5	Security	14	Boiler	6	Incinerator	15	clarification	7	FFB grading	16	Electrical	8	store	17	Effluent pond	9	Tools & equipment	18	CPO/CPK despatch		Date	Subject	Attendees	1	5-6/9/18	Chemical spillage oil spillage ERP	3	2	5/9/18	SOP & SOM	5	3	19/2/18	Recycling program SW management	entire	4	4/7/18	Process station SOP & handling	11	
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**MSPO Public Summary Report
Revision 0 (Aug 2017)**

Criterion / Indicator	Assessment Findings	Compliance																		
	<p>Safety Helmet safety shoes hand gloves, leather gloves, luminous strip /jacket, dust mask. Records of PPE issuance were sighted. During the mill site visit workers were observed to be in approved PPE.</p> <p>The following manuals contained SOP for chemical handling and used as a procedure in handling chemicals. <i>Quality, Environmental, Safety & Health Manual & Sustainability Manual dated 01/7/17.</i> Both were issued from Head Office and used in all operating units within the Group.</p> <p>The Mill management conducts regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held are recorded below</p> <table border="1" data-bbox="1088 970 1789 1099"> <thead> <tr> <th>No</th> <th>Date</th> <th>Attendees</th> <th>No</th> <th>Date</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>01/2/18</td> <td>17</td> <td>3</td> <td>01/9/18</td> <td>18</td> </tr> <tr> <td>2</td> <td>25/5/18</td> <td>18</td> <td>4</td> <td>10/12/18</td> <td>10</td> </tr> </tbody> </table> <p>Agenda discussed;</p> <ul style="list-style-type: none"> j) Confirmation of minutes previous meeting k) Workplace inspection report/Accident report l) Medial surveillance & Audiometric m) Status of Safety Program & Environmental n) First Aid Kit & Fire Extinguishers Report o) HIRARC/Complaint from Employee/External Party. p) Other matters 	No	Date	Attendees	No	Date	Attendees	1	01/2/18	17	3	01/9/18	18	2	25/5/18	18	4	10/12/18	10	
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	<p>Workplace inspection mad prior to the OSH meeting.</p> <p>The Mill Acting Manager was appointed as Chairman through letter dated 13/2/19 signed by Vice President Processing (Sabah)</p> <p>The procedures for accident and emergencies has been established. There is formation of ERP Team & ERP for all the identified incidences. In addition the procedures have been summarised in a chart flow form and displayed for information of all employees in the mill. They includes emergencies relating fire, chemical spillage, oil spillage, effluent overflow.</p> <ul style="list-style-type: none"> e) <i>Ahli J/Kuasa Pasukan Bertindak Kecemasan 2019</i> headed by the Mill Manager f) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Kebakaran</i> g) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Minyak</i> h) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Kimia</i> i) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan effluen</i> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SD and amended to tailor to the situation differences in the estate and mill.</p> <table border="1" data-bbox="1086 1197 1624 1382"> <thead> <tr> <th></th> <th>Emergency situation</th> <th>Mill</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Fire</td> <td>/</td> <td>/</td> </tr> <tr> <td>2</td> <td>Oil spillage</td> <td>/</td> <td></td> </tr> <tr> <td>3</td> <td>Effluent overflow</td> <td>/</td> <td></td> </tr> </tbody> </table>		Emergency situation	Mill	Estate	1	Fire	/	/	2	Oil spillage	/		3	Effluent overflow	/		
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**MSPO Public Summary Report
Revision 0 (Aug 2017)**

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		4	Chemical spillage	/	/																													
		5	Flood		/																													
		6	Accident at work place		/																													
<p>ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training.</p> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>19/3/18</td> <td>Noise training</td> <td>1</td> </tr> <tr> <td>2</td> <td>1/10/18</td> <td>Fire briefing/talk & fire drill</td> <td>entire</td> </tr> <tr> <td>3</td> <td>1/10/18</td> <td>CPR – First Aid Response</td> <td>Entire</td> </tr> <tr> <td>4</td> <td>5-6/9/18</td> <td>Chemical spillage oil spillage ERP</td> <td>3</td> </tr> </tbody> </table> <p>The mill trained their assigned employees for First Aid mainly those involved in the process operations. Training program on the first Aider was organised on Group basis. The First Aid Kit (box) equipped with approved 16 items were available and replenished on a weekly basis. Distribution of the First Aid Kit for both the estates are made at the following places/personnel;</p> <ul style="list-style-type: none"> - Office / AP Post / - Chemical Store / general store / - Workshop / laboratory <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>								Date	Subject	Attendees	1	19/3/18	Noise training	1	2	1/10/18	Fire briefing/talk & fire drill	entire	3	1/10/18	CPR – First Aid Response	Entire	4	5-6/9/18	Chemical spillage oil spillage ERP	3		Date	Subject	Attendees				
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MSPO Public Summary Report
Revision 0 (Aug 2017)

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		1	1/10/18	Fire briefing/talk & fire drill	entire																
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		<p>Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKKP 8 a mandatory requirement was submitted to DOSH on 10/1/19. Accident Statistics are being maintained in a satisfactory manner</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th colspan="4">No of cases</th> </tr> <tr> <th></th> <th>LTI</th> <th>LTI</th> <th>Non LTI</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>GSPOM</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table>					No of cases					LTI	LTI	Non LTI	Total	GSPOM	0	0	0	0	
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Criterion 4.4.5: Employment conditions																					
4.4.5.1	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p>- Major compliance -</p>	<p>Genting Plantations has established Social Policy incorporating the Labour and Human Rights Requirement signed by the President and Chief Operating Officer on 22/6/2015.</p> <p>The policy were communicate to the employee through training, briefing and displayed on notice board. Sighted the training records on the Company Policy training dated 10/1/2018 and 19/2/2018.</p>				Complied															

Criterion / Indicator	Assessment Findings	Compliance
<p>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.</p> <p>- Major compliance -</p>	<p>Genting Plantations has established Social Policy incorporating the Labour and Human Rights Requirement signed by the President and Chief Operating Officer on 22/6/2015.</p> <p>The Social Policy stated the commitment of the company not supporting any discriminatory practices documented in Non Discrimination section. In the policy stated the company shall not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.</p>	<p>Complied</p>
<p>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.</p> <p>- Major compliance -</p>	<p>Employment contract were issued to the workers before started working in the mill. The employment contract were acknowledge and accept/signed by the workers. A copy of the contract kept by the workers and verified through interviewed with the workers. The terms and conditions were clearly stated in the ‘Perjanjian Pekerjaan’ such as salary, working hours and overtime work. The contract were written in the language understand by the employee. Pay and conditions are documented and are above the Minimum Wage Order 2018.</p> <p>The workers are in monthly rate salary of minimum RM 1100. Sampled of the payslips confirmed that the workers were paid in accordance with Minimum Wage Order 2018. Sighted the sampled payslip for January and February 2019 as follows:</p> <ul style="list-style-type: none"> i. E00022 ii. E00059 	<p>Complied</p>

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		iii. E00092 iv. E00226 v. E00214	
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance -	There was no permanent contractor available in the mill. Most of the maintenance and repair work was carried out by their own technicians or short term contractor. Therefore, there was no issue on the wages of employees of contractors.	Complied
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 -	The mill management has established records off all employees and documented in List of Executives, Staff And Workers. In the list stated the full names, employee no., gender, date of birth, date of entry, a job description/station, wage and the period of employment.	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 contract were issued to the workers before started working in the mill. The employment contract were acknowledge and accept/signed by the workers. A copy of the contract kept by the workers and verified through interviewed with the workers. The terms and conditions were clearly stated in the 'Perjanjian Pekerjaan' such as contract period, working area, employee responsibilities, salary, working hours, overtime work, rest day, public holiday, housing, working tools, medical, sick leave, annual	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<p>leave, employment termination period and condition. The contract were written in the language understand by the employee.</p> <p>Sampled the employment contract for employee as follows:</p> <ul style="list-style-type: none"> i. E00022 ii. E00059 iii. E00092 iv. E00226 v. E00214 	
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p>- Major compliance -</p>	<p>The mill record the employee attendance, working hours and overtime through Punch Card System. In the time card stated the working time in and time out and overtime hours. Sighted the time card for the sampled workers as follows:</p> <ul style="list-style-type: none"> i. E00022 ii. E00059 iii. E00092 iv. E00226 v. E00214 <p>No workers working overtime for more than 104 hours per month.</p>	Complied
4.4.5.8	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective</p>	<p>Punch card of sampled workers found that the enter time and exit time was clearly stated in the time card. No workers working overtime for more than 104 hours per month.</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

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>Reviewed the time cards for the sampled employee as follows:</p> <ul style="list-style-type: none"> i. E00022 ii. E00059 iii. E00092 iv. E00226 v. E00214 	
<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>The mill distributed the Payslip to the employee during the payment day. Verified during document review the normal days' work and overtime hours were tallied with the Punch Card. All payment were as per Minimum Wage Order 2016 and the Minimum Wages Order 2018. Sighted the Payslip for the month of November 2018, December 2018, January 2019 and February 2019 for sampled employee as follows:</p> <ul style="list-style-type: none"> i. E00022 ii. E00059 iii. E00092 iv. E00226 v. E00214 	Complied
<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</p>	<p>The mill management has provided benefits all the employee and dependents with basic amenities such as football field, badminton court, Crèche and place of worship. For medical care, the management has established Estate Clinics with Health Assistant.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	development, medical care provisions and improvement of social surroundings. - Minor compliance -	The good performance workers will be awarded with incentive once a year.	
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	The employee were provided with housing quarters with basic amenities such as football field, badminton court, Creche, place of worship and estate clinic. The water and electricity were supply to all employee for free.	Complied
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Genting Plantation has established Sexual Harassment Policy signed by the Chief Operating Officer dated 3/8/2009. The company committed to strive for harassment free environment as per Code of Practice on Prevention and Eradication of Sexual Harassment in the Workplace, issued by the Ministry of Human Resource Malaysia (1999)	Complied
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 -	Genting Plantation employee are allow to form and join any Legal Trade Union as stated in the Social Policy established and signed by the President and Chief Operating Officer dated 22/6/2015.	Complied

Criterion / Indicator		Assessment Findings	Compliance																																								
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 -	<p>Genting Plantations has established Social Policy incorporating the Labour and Human Rights Requirement signed by the President and Chief Operating Officer on 22/6/2015. In the policy stated the company commitment not to use child labour.</p> <p>Reviewed the list of workers documented in the List of Executives, Staff and Workers as at March 2019 and Employment contract, all workers employed in the mill are above minimum age of 18 years old.</p>	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 -	<p>Bulk of the mill training is organized during the daily briefing prior to work commencement of each shift. Mainly the issues discussed / briefed were related to mill process operations and safety compliance. These training records are maintained in a separate book and were sighted during the audit</p> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>10/1/18</td> <td>Briefing of Company's Policies</td> <td>entire</td> </tr> <tr> <td>2</td> <td>1/2/18</td> <td>ESH committee members role</td> <td></td> </tr> <tr> <td>3</td> <td>7/2/18</td> <td>Management System procedures</td> <td>5</td> </tr> <tr> <td>4</td> <td>10/3/18</td> <td>Procedure handling new workers</td> <td>4</td> </tr> <tr> <td>5</td> <td>14/3/18</td> <td>OER standing instruction</td> <td>6</td> </tr> <tr> <td>6</td> <td>19/3/18</td> <td>Noise training</td> <td>1</td> </tr> <tr> <td>7</td> <td>1/9/18</td> <td>Complaint grievance procedure SOP</td> <td>Entire</td> </tr> <tr> <td>8</td> <td>1/10/18</td> <td>Fire briefing/talk & fire drill</td> <td>entire</td> </tr> <tr> <td>9</td> <td>1/10/18</td> <td>CPR – First Aid Response</td> <td>Entire</td> </tr> </tbody> </table>		Date	Subject	Attendees	1	10/1/18	Briefing of Company's Policies	entire	2	1/2/18	ESH committee members role		3	7/2/18	Management System procedures	5	4	10/3/18	Procedure handling new workers	4	5	14/3/18	OER standing instruction	6	6	19/3/18	Noise training	1	7	1/9/18	Complaint grievance procedure SOP	Entire	8	1/10/18	Fire briefing/talk & fire drill	entire	9	1/10/18	CPR – First Aid Response	Entire	Complied
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MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance
		10	14/10/18	Permit to work	15	
		11	5-6/9/18	Chemical spillage oil spillage ERP	3	
		12	5/9/18	SOP & SOM	5	
		13	28/6/18	MPD Analysis New Method	5	
		14	12/4/18	Legal other requirement	6	
		15	19/2/18	MSPO RSPO policy briefing	Entire	
		16	19/2/18	Recycling program SW management	entire	
		17	18/10/18	Green House Gas GHG V 11	2	
		18	27/4/18	Supply chain traceability & MB	3	
		19	3/4/18	Zero burning	entire	
		20	20/7/18	Process station SOP & handlings	12	
		21	4/7/18	Process station SOP & handling	11	
		22	16/7/18	Workshop operations	13	
		23	6/7/18	Engine room operations	3	
		24	27/6/18	Security operations	5	
		25	27/6/18	FFB reception	6	
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>This requirement has been established and sighted. It is adequate to address the requirement of the employees' training needs. The details of the training needs include categories of job descriptions, sections, and employees group. Included in this program are subjects related to environment e.g. environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training, field activities, equipment handling, vehicles maintenance etc.</p>				Complied

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

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<p>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.</p> <p>- Minor compliance -</p>	<p>The annual training program has been established and significantly covers all aspects of the MSPO requirements. There were also additional subjects including the mill operating procedures, parameters of mill produce, machinery maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects. The subjects for the training are issued and assisted by the SD personnel. The following topics included in the annual training program 2019 among others as shown below;</p> <table border="1" data-bbox="1086 767 1845 1377"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">(Mill) subject</th> <th colspan="3">schedule</th> </tr> <tr> <th>1-4</th> <th>5-9</th> <th>9-12</th> </tr> </thead> <tbody> <tr><td>1</td><td>Requirement ISO 9001/14001/18001</td><td>/</td><td></td><td></td></tr> <tr><td>2</td><td>ESH policy objective, target & program</td><td>/</td><td></td><td></td></tr> <tr><td>3</td><td>New FW – procedure</td><td>/</td><td></td><td></td></tr> <tr><td>4</td><td>Duties of production supervisor</td><td>/</td><td></td><td></td></tr> <tr><td>5</td><td>ESH role & function</td><td>/</td><td></td><td></td></tr> <tr><td>6</td><td>Competency, training & awareness</td><td>/</td><td></td><td></td></tr> <tr><td>7</td><td>ERP procedure and evacuation</td><td></td><td>/</td><td></td></tr> <tr><td>8</td><td>Legal & other requirement</td><td></td><td>/</td><td></td></tr> <tr><td>9</td><td>Permit TW/handling of tools equipment</td><td>/</td><td></td><td></td></tr> <tr><td>10</td><td>HIRARC & EAI</td><td></td><td>/</td><td></td></tr> <tr><td>11</td><td>Non Conformity Action</td><td></td><td>/</td><td></td></tr> <tr><td>12</td><td>Complaint & grievance procedure</td><td></td><td>/</td><td></td></tr> <tr><td>13</td><td>SOP & ECP for individual procedure</td><td></td><td>/</td><td></td></tr> <tr><td>14</td><td>PPE adherence</td><td></td><td>/</td><td></td></tr> <tr><td>15</td><td>OER project – standing instruction</td><td></td><td></td><td>/</td></tr> <tr><td>16</td><td>Scheduled waste management</td><td></td><td></td><td>/</td></tr> <tr><td>17</td><td>Supplier selection & evaluation</td><td></td><td>/</td><td></td></tr> <tr><td>18</td><td>Process monitoring & WA reporting</td><td></td><td></td><td>/</td></tr> </tbody> </table>		(Mill) subject	schedule			1-4	5-9	9-12	1	Requirement ISO 9001/14001/18001	/			2	ESH policy objective, target & program	/			3	New FW – procedure	/			4	Duties of production supervisor	/			5	ESH role & function	/			6	Competency, training & awareness	/			7	ERP procedure and evacuation		/		8	Legal & other requirement		/		9	Permit TW/handling of tools equipment	/			10	HIRARC & EAI		/		11	Non Conformity Action		/		12	Complaint & grievance procedure		/		13	SOP & ECP for individual procedure		/		14	PPE adherence		/		15	OER project – standing instruction			/	16	Scheduled waste management			/	17	Supplier selection & evaluation		/		18	Process monitoring & WA reporting			/	<p>Minor NC</p>
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		19	Noise training		/	
		20	Electrical main switch board		/	
		<p>The understanding of the PPE adherence on working at height and CPO dispatches to be enhanced through training to the operators and the tanker drivers. Hence an NCR is raised.</p>				
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 shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>The Group Environmental Policy had been established and implemented for all Mills and Estates. The policy was signed by the President / Chief Operating Officer of <i>Genting Plantations Bhd</i> dated 21 Dec 2009 and displayed prominently on notice boards in English and local language <i>Bahasa Malaysia</i>. The Policy is implemented along with other Policies through the OSH activities by the on-site Safety Officers and monitored by OSH/Sustainability Unit from Head Office. Included in the Policy among others are the following commitment;</p> <ul style="list-style-type: none"> e) Commitment and protection of the environment according to the applicable laws. f) Establishment of environmental management plan developed from results of aspect and impact analysis, mitigation, monitoring plans and records of implementation with timelines. g) Continual improvement program 				Complied

Criterion / Indicator		Assessment Findings	Compliance												
		<p>h) Awareness through training / briefing program & session to all employees and stakeholders.</p> <p>During interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the basic objectives and intention of the Policy.</p>													
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations</p> <p>- Major compliance -</p>	<p>The mill has identified the environmental objectives for implementation in 2018 among others;</p> <p>a) BOD level < 215 ppm.</p> <p>b) Reduce water consumption not more 0.9m³/mt FFB</p> <p>c) POME generated per FFB processed at 75% /FFB</p> <p>Interviews with the workers and staff during the site visit revealed that the employees had been briefed and understood on the environmental protection in the mill.</p> <p>The aspects and impacts of all operations has been identified and formalised among others as described in the following environment improvement and management plan. It is being reviewed on yearly basis.</p> <table border="1"> <thead> <tr> <th>Source</th> <th>Negative Impacts</th> </tr> </thead> <tbody> <tr> <td colspan="2"><i>Water</i></td> </tr> <tr> <td>Consumption of water for mill operation/residence</td> <td>Water wastage</td> </tr> <tr> <td rowspan="2">Contamination of water with chemical & organic matter into ground water</td> <td>Loss of habitat, food resources & breeding</td> </tr> <tr> <td>Poor water quality for consumption</td> </tr> <tr> <td rowspan="2">Pollution from mill operations & effluent</td> <td>Mill waste by product bunch ash/boiler ash.</td> </tr> <tr> <td>Mill effluent / POME</td> </tr> </tbody> </table>	Source	Negative Impacts	<i>Water</i>		Consumption of water for mill operation/residence	Water wastage	Contamination of water with chemical & organic matter into ground water	Loss of habitat, food resources & breeding	Poor water quality for consumption	Pollution from mill operations & effluent	Mill waste by product bunch ash/boiler ash.	Mill effluent / POME	Complied
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4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p>- Major compliance -</p>	<p>The improvement and mitigation plan as initiated are given in the following table.</p> <table border="1"> <thead> <tr> <th>Negative Impact</th> <th>Improvement/Mitigation Plan</th> </tr> </thead> <tbody> <tr> <td>Water wastage</td> <td>Optimise usage & reduce wastage</td> </tr> <tr> <td>Loss of habitat, food resources & breeding</td> <td>Isolate the treated & contaminated water from discharge to monsoon drain</td> </tr> <tr> <td>Poor water quality for consumption</td> <td>To ensure the water usage used as necessary to prevent depletion of clean water sources.</td> </tr> <tr> <td>Mill effluent / POME</td> <td>To reduce BOD level at final discharge <500 ppm. To prevent overflowing during pumping into flatbeds</td> </tr> <tr> <td>Flooding due to exposure surface for soil erosion by construction</td> <td>To ensure the surface exposed being covered & well maintained</td> </tr> <tr> <td>Hearing impairment to employees</td> <td>To control noise generated from mil operation through audiometric monitoring</td> </tr> </tbody> </table>		Negative Impact	Improvement/Mitigation Plan	Water wastage	Optimise usage & reduce wastage	Loss of habitat, food resources & breeding	Isolate the treated & contaminated water from discharge to monsoon drain	Poor water quality for consumption	To ensure the water usage used as necessary to prevent depletion of clean water sources.	Mill effluent / POME	To reduce BOD level at final discharge <500 ppm. To prevent overflowing during pumping into flatbeds	Flooding due to exposure surface for soil erosion by construction	To ensure the surface exposed being covered & well maintained	Hearing impairment to employees	To control noise generated from mil operation through audiometric monitoring	Complied
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		All actions are to be monitored on the indicated frequency shown in the plan.																																												
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	This is available and compiled and incorporated in the details as provided in 4.5.1.3 above.	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 -	<p>A training program is available in the Mill Training Plan updated on yearly basis and revised as per the management requirement. Included in this plan is the internal and external program. Subjects among others identified related to environment are;</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">(Mill) subject</th> <th colspan="3">schedule</th> </tr> <tr> <th>1-4</th> <th>5-9</th> <th>9-12</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Requirement ISO 9001/14001/18001</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>2</td> <td>ESH policy objective, target & program</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>3</td> <td>ESH role & function</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>4</td> <td>Legal & other requirement</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>5</td> <td>HIRARC & EAI</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>6</td> <td>Scheduled waste management</td> <td></td> <td></td> <td>/</td> </tr> <tr> <td>6</td> <td>Noise training</td> <td></td> <td></td> <td>/</td> </tr> </tbody> </table> <p>Trainings relating to environmental are held by the mill. Sighted training sessions in relation to environmental as listed below.</p>		(Mill) subject	schedule			1-4	5-9	9-12	1	Requirement ISO 9001/14001/18001	/			2	ESH policy objective, target & program	/			3	ESH role & function	/			4	Legal & other requirement		/		5	HIRARC & EAI		/		6	Scheduled waste management			/	6	Noise training			/	Complied
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MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings				Compliance
			Date	Subject	Attendees	
		1	10/1/18	Briefing of Company's Policies	entire	
		2	1/2/18	ESH committee members role	10	
		3	19/3/18	Noise training	1	
		4	5-6/9/18	Chemical spillage oil spillage ERP	3	
		5	19/2/18	Recycling program SW management	entire	
		6	18/10/18	Green House Gas GHG V 11	2	
		7	3/4/18	Zero burning	entire	
		8	16/7/18	Workshop operations	13	
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	Environmental issues are also discussed during the weekly briefing & also during the ESH meetings. Records as per the ESH meeting.				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, electricity in the operations over the base period - Major compliance -	Monthly and annual records on energy consumption for non-renewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Sighted tabulation of data maintained by the mill.				Complied
			Year	Diesel /mt FFB	Diesel /mt CPO	
		1	2012	2.28	10.90	
		2	2013	2.27	10.76	
		3	2014	2.21	9.96	
		4	2015	2.13	9.69	
		5	2016	2.46	11.28	
		6	2017	2.35	11.33	

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

Criterion / Indicator		Assessment Findings				Compliance																		
		7	2018	2.38	11.36																			
		<p>Performance of /mt FFB above vary from lowest 9.69 to highest 11.36 over a span of 7 years. There were variation in baseline figures between the mills in the Group attributed by factors i.e. mill throughput, design, machine line up and technology input, no of diesel engine etc. The Mill had management plan dated 11/8/2018 to improve the efficiency of diesel usage and to optimize renewable energy details of which are shown below</p> <table border="1"> <thead> <tr> <th></th> <th colspan="2">Specific Concerns</th> <th>Management Plan objectives & targets</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1</td> <td rowspan="2">Diesel usage</td> <td>Continuous running engine by tractors/lorries</td> <td>Drivers to OFF engine where parking is >3 min.</td> </tr> <tr> <td>Diesel consumption by gen-set during unstable operations /insufficient fiber supply to boiler</td> <td>Maintain operations 3 presses for stable fiber supply to boiler. To carry out preventive maintenance to prevent high b/down hrs. To make scheduled boiler inspection.</td> </tr> <tr> <td>2</td> <td>GHG Emission (diesel)</td> <td>Optimum diesel consumption by diesel gen set & mill vehicles</td> <td>Operating diesel gen set only during non-processing hours. Regular checking on vehicle condition & maintenance upon diesel leaking.</td> </tr> <tr> <td>3</td> <td>Internal mill vehicle</td> <td>FFB cages push in & out</td> <td>To use winch for FFB cages push in & out from sterilizer & unloading ramp.</td> </tr> </tbody> </table>					Specific Concerns		Management Plan objectives & targets	1	Diesel usage	Continuous running engine by tractors/lorries	Drivers to OFF engine where parking is >3 min.	Diesel consumption by gen-set during unstable operations /insufficient fiber supply to boiler	Maintain operations 3 presses for stable fiber supply to boiler. To carry out preventive maintenance to prevent high b/down hrs. To make scheduled boiler inspection.	2	GHG Emission (diesel)	Optimum diesel consumption by diesel gen set & mill vehicles	Operating diesel gen set only during non-processing hours. Regular checking on vehicle condition & maintenance upon diesel leaking.	3	Internal mill vehicle	FFB cages push in & out	To use winch for FFB cages push in & out from sterilizer & unloading ramp.	
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Criterion / Indicator		Assessment Findings				Compliance	
		4	Diesel usage/year	To maintain and reduce diesel consumption	Change diesel gen set to SEB during non-processing hours.		
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 used by contractors, including all transport and machinery operations are available in the mill annual budget. This was sighted in the 2019 annual estimate.				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. Surplus quantity of shell/fibre are delivered to estates for multi purposes or sold to outside buyers. EFB is used in the estates for mulching. The quantum of fibre and shell produced from the mill processing is calculated based on the mass ratio i.e. shell and fibre approx. at 6% and 13 % of the FFB respectively. The ratio of fibre/shell utilized in the boiler is recorded as follows;				Complied	
			Year	2015	2016	2017	2018
		1	FFB /mt	115382	114251	122319	111145
		2	Fibre/shell used	19727	19258	21829	19770
		3	Fibre/shell / FFB	0.171	0.169	0.178	0.178

Criterion / Indicator	Assessment Findings	Compliance																			
Criterion 4.5.3: Waste management and disposal																					
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>All waste and pollution are identified and documented in the Waste Management. The compilation for 2019 was guided by the Sustainability Department applicable to both estates and mills. Details of waste generated and the source arising from the mill operations/activities among others are shown below;</p> <table border="1" data-bbox="1086 699 1861 1268"> <thead> <tr> <th>Type of waste</th> <th>Location/Source</th> </tr> </thead> <tbody> <tr> <td>Domestic waste -rubbish</td> <td>Line sites, office, workshop, store,</td> </tr> <tr> <td>Industrial Waste -Scrap metal</td> <td>Workshop operations</td> </tr> <tr> <td>Recyclable Waste-Plastic, glass, paper</td> <td>Line site, office, residential complex</td> </tr> <tr> <td>Scheduled Waste 404 Clinical waste</td> <td>clinic</td> </tr> <tr> <td>Scheduled Waste rags, plastics, filters,</td> <td>Mill processing activities Workshop</td> </tr> <tr> <td>Scheduled Waste Spent lubricant & hydraulic oil</td> <td>Workshop</td> </tr> <tr> <td>Scheduled Waste Disposed containers, bags, equipment contaminated with chemicals (Boiler Treatment),</td> <td>Mill processing activities, scheduled waste store.</td> </tr> <tr> <td>Biomass Waste-Fiber /Shell</td> <td>Waste from extraction of oil and kernel.</td> </tr> </tbody> </table>	Type of waste	Location/Source	Domestic waste -rubbish	Line sites, office, workshop, store,	Industrial Waste -Scrap metal	Workshop operations	Recyclable Waste-Plastic, glass, paper	Line site, office, residential complex	Scheduled Waste 404 Clinical waste	clinic	Scheduled Waste rags, plastics, filters,	Mill processing activities Workshop	Scheduled Waste Spent lubricant & hydraulic oil	Workshop	Scheduled Waste Disposed containers, bags, equipment contaminated with chemicals (Boiler Treatment),	Mill processing activities, scheduled waste store.	Biomass Waste-Fiber /Shell	Waste from extraction of oil and kernel.	<p>Complied</p>
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<p>4.5.3.2 A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <ul style="list-style-type: none"> 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>- Major compliance -</p>	<p>The waste management plan for 2019 was compiled on 12/2/19 and has been implemented. Details as follows;</p> <table border="1" data-bbox="1088 544 1861 1235"> <thead> <tr> <th>Type of waste</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>Domestic waste -rubbish</td> <td>Collection/disposal 2x/week to the estate designated landfill.</td> </tr> <tr> <td>Industrial Waste -Scrap metal</td> <td>Inventory maintained, tender at zone level for sale to licensed contractors</td> </tr> <tr> <td>Recyclable Waste -Plastic, glass, paper</td> <td>Storage and later for sale to licensed buyers every quarterly.</td> </tr> <tr> <td>Scheduled Waste 404 Clinical waste</td> <td>Inventory maintained. Storage in sharp bin in clinic. Disposal through VMO clinic.</td> </tr> <tr> <td>Scheduled Waste rags, plastics, filters,</td> <td>Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor.</td> </tr> <tr> <td>Scheduled Waste Spent lubricant & hydraulic oil</td> <td>Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor</td> </tr> <tr> <td>Scheduled Waste Disposed containers, bags, equipment contaminated with chemicals (Boiler Treatment),</td> <td>Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by authorized vendor..</td> </tr> <tr> <td>Biomass Waste Fiber /Shell</td> <td>Reuse as fuel in the boiler combustion</td> </tr> </tbody> </table> <p>The above initiative and management plan is also a common practice within the industry elsewhere.</p>	Type of waste	Action to be taken	Domestic waste -rubbish	Collection/disposal 2x/week to the estate designated landfill.	Industrial Waste -Scrap metal	Inventory maintained, tender at zone level for sale to licensed contractors	Recyclable Waste -Plastic, glass, paper	Storage and later for sale to licensed buyers every quarterly.	Scheduled Waste 404 Clinical waste	Inventory maintained. Storage in sharp bin in clinic. Disposal through VMO clinic.	Scheduled Waste rags, plastics, filters,	Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor.	Scheduled Waste Spent lubricant & hydraulic oil	Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor	Scheduled Waste Disposed containers, bags, equipment contaminated with chemicals (Boiler Treatment),	Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by authorized vendor..	Biomass Waste Fiber /Shell	Reuse as fuel in the boiler combustion	<p>Complied</p>
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MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.3.3 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>The procedures for handling used chemicals classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by Head Office personnel and implemented in all estates and mills for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows;</p> <ul style="list-style-type: none"> c) Management of class 2 (and higher) chemical containers. d) Management of fertilizer bags <p>These documents were established on 13/8/2009 (OSH Manual) and 01/8/2013 (Sustainability Manual) and remained effective for practice in all estates and mills.</p> <p>There was no records of inventory and disposal to the authorised vendor for the disposal of the SW 410 (used PPE) hence an NCR is raised.</p>	<p>Major NC</p>
<p>4.5.3.4 Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p>- Minor compliance -</p>	<p>Both the estates/mill disposed their domestic waste to the designated landfill located in the host estate. All domestic waste are collected 2x /week by the estate management.</p>	<p>Complied</p>
<p>Criterion 4.5.4: Reduction of pollution and emission</p>		
<p>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.</p>	<p>This is available in the Mill Pollution Prevention Plan 2018. This document was prepared and approved on 12/2/2019. Among others the mill has identified activities producing pollution in the following in the 2018 plan.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings		Compliance																		
	- Major compliance -	<table border="1"> <thead> <tr> <th></th> <th>Pollution Source</th> <th>Specific Concern</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>FFB Receiving</td> <td>Air Pollution Noise Pollution</td> </tr> <tr> <td>2</td> <td>Vehicle parking area</td> <td>Water & soil pollution due to leakages from vehicles Generation of scheduled waste</td> </tr> <tr> <td>3</td> <td>FFB sterilisation</td> <td>Water pollution Generation of scheduled waste</td> </tr> <tr> <td>4</td> <td>CPO Clarification</td> <td>Water pollution Risk of contaminated CPO with oil</td> </tr> <tr> <td>5</td> <td>Nut cracking & CPK Production</td> <td>Air Pollution Water pollution</td> </tr> </tbody> </table> <p>Mainly the mill identified source of pollution from their processing activities at the identified stations.</p>		Pollution Source	Specific Concern	1	FFB Receiving	Air Pollution Noise Pollution	2	Vehicle parking area	Water & soil pollution due to leakages from vehicles Generation of scheduled waste	3	FFB sterilisation	Water pollution Generation of scheduled waste	4	CPO Clarification	Water pollution Risk of contaminated CPO with oil	5	Nut cracking & CPK Production	Air Pollution Water pollution		
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4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	<p>The action plan/mitigation measures taken to reduce the identified pollutants are described in the following;</p> <table border="1"> <thead> <tr> <th></th> <th>Pollution Source</th> <th>Action Plan/Mitigation Measures</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>FFB Receiving</td> <td>Regular servicing maintenance of vehicles/machinery Engine OFF while awaiting entrance to the ramp Ensure major traffic areas are away from residential complex, signage on speed limit,</td> </tr> <tr> <td>2</td> <td>Vehicle parking area</td> <td>Tray provided for the drivers to be used underneath their vehicle during stationary. Used gloves & contaminated fibre to treat as scheduled waste.</td> </tr> </tbody> </table>		Pollution Source	Action Plan/Mitigation Measures	1	FFB Receiving	Regular servicing maintenance of vehicles/machinery Engine OFF while awaiting entrance to the ramp Ensure major traffic areas are away from residential complex, signage on speed limit,	2	Vehicle parking area	Tray provided for the drivers to be used underneath their vehicle during stationary. Used gloves & contaminated fibre to treat as scheduled waste.		Complied									
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MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings		Compliance
		3	<p>FFB sterilisation</p> <p>Install & maintain oil trap at monsoon drains if steriliser condensate is leaking. Discharge steriliser condensate into sludge pit for recovery purposes</p> <p>Used glove & contaminated fibre to treat as scheduled waste.</p>	
		4	<p>CPO Clarification</p> <p>Install & maintain high level siren at sludge tank, hot water tank & CPO tank Channel all spillages to sludge pit for recovery purposes. Recover oil from sludge pit to oil room for reprocessed.</p> <p>Regular service & maintenance of machinery Containment via bunds for machinery/gearbox</p>	
		5	<p>Nut cracking & CPK Production</p> <p>Install cover plate at particular machine e.g. cracker mixture. Reduce the frequency of floor washing</p>	
4.5.4.3	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p>- Major compliance -</p>	<p>The treated mill effluent discharge is regularly monitored as prescribed in the "<i>Jadual Pematuhari</i>" license issued to the mill. The limit for the Biochemical Oxygen Demand (BOD) discharge is 500 mg/l for land application. In addition daily site checking on the effluent ponds are made by the supervisory personnel and effluent attendants. Reports for the effluent parameters are submitted using "<i>Borang Penyata Suku Tahun</i>" to DOE for compliance. Sighted the effluent results in the Dynakey Laboratories Sdn Bhd all BOD parameter was in compliance to the DOE requirement.</p>		Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings					Compliance				
			Parameters	standard	2/10/18	2/11/18	1/12/18				
		1	PH	-	7.9	8.2	8.0				
		2	BOD	500	240	122	103.2				
		3	COD	-	2350	1982	1728				
		4	T Solids	-	7000	5650	5060				
		5	S Solids	-	1020	495	450				
		6	O & G	-	23.2	18.8	27.60				
		7	A Nitrogen	-	181.40	46.10	134				
		8	Total N	-	270.50	226	200				
		<p>Only BOD specification was provided in the DOE <i>Jadual Pematuhan</i> ref. <i>JPKKS/12/001878</i>.</p>									
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> <p>a) Assessment of water usage and sources.</p> <p>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</p>	<p>The Water Management Plan for the mill has been established with latest review on 12/2/2019. The plan emphasized on the following areas.</p> <ul style="list-style-type: none"> e) Water source/Efficient use of water f) Renewability of water source g) Avoidance of surface and ground water contamination <p>Details of the action plan and monitoring among others are tabled as follows;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"></td> <td style="width: 50%;"></td> </tr> <tr> <td style="text-align: center;">Areas of concerns</td> <td style="text-align: center;">Action Plan</td> </tr> </table>							Areas of concerns	Action Plan	Complied
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MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings			Compliance
<p>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> <p>- Major compliance -</p>	1	Water source	Water from catchment pond	Supply to residential areas /complex for all divisions	
			Use for mill processing and washing.		
			Rain Harvest	Use for general compound and washing.	
	2	Efficient use of water	Residential areas	Monitoring of pipes leakages	
			Optimize usage & reduce wastage	Recycle coolant water from engine room back to water system. Reduce floor washing by sweeping.	
			Education/training	Promote water conservation/awareness among employees	
	3	Renewability water source	Rain water capture at catchment	Monitoring of pond level and daily rainfall.	
			Rain water harvest	Collection through gutter and usage for floor cleaning.	
	4	Avoidance of surface/ground water contamination	Contamination of surface and ground water through run-off soil, nutrients or chemicals, disposal of POME	Inspection of bund/ secondary compartment for CPO, chemical storage area including SW store & machinery.	
				Proper arrangement of EFB to estate.	
				Land irrigation application for POME discharge	
				Educate ERPT during event of spillages.	

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings		Compliance		
			<p>Outgoing water into main natural waterways be monitored at frequency that reflects the estates/mills current activities which may have negative impact.</p> <p>Drainage system</p> <p>Water pollution control</p>	<p>To monitor water quality</p> <p>To monitor BOD of POME</p> <p>To maintain good condition of sewage system.</p> <p>To ensure landfill >400 m from river/water source to prevent contamination.</p> <p>Maintenance of flatbed/furrow for proper flow.</p> <p>Free flow drains & scheduled maintenance</p> <p>To monitor the water quality for drinking water upstream/downstream water, boundary water, mill discharge water.</p>		
		5	Others	<p>Aim to ensure plantations activities do not cause adverse impacts to water source of local communities, employees and their families.</p>	<p>To monitor water quality through analysis of hulu/hilir, boundary & outlet.</p> <p>Monitoring of chemical consumption used for water treatment plant.</p> <p>rainfall,</p> <p>Monitoring of chemical consumption used for water treatment plant.</p> <p>rainfall</p>	

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator	Assessment Findings	Compliance																																																																																																	
	<p>Water samples are taken monthly from Sg Labuk to trace conformity of indication of being non-polluted. Details as shown below.</p> <table border="1" data-bbox="1088 571 1865 906"> <thead> <tr> <th rowspan="2">Parameters</th> <th rowspan="2">INQWS limit</th> <th colspan="2">25/2/2019</th> <th colspan="2">25/1/18</th> </tr> <tr> <th><i>Up stream</i></th> <th><i>Down stream</i></th> <th><i>Up stream</i></th> <th><i>Down stream</i></th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>5-9</td> <td>7.0</td> <td>7.0</td> <td>7.0</td> <td>7.4</td> </tr> <tr> <td>COD</td> <td><100</td> <td>ND</td> <td>ND</td> <td>ND</td> <td>ND</td> </tr> <tr> <td>BOD</td> <td><12</td> <td>2.1</td> <td>2.2</td> <td>2</td> <td>17</td> </tr> <tr> <td>AN</td> <td><2.7</td> <td>ND</td> <td>ND</td> <td>ND</td> <td>ND</td> </tr> <tr> <td>SS</td> <td>ND</td> <td>23</td> <td>8</td> <td>28</td> <td>25</td> </tr> <tr> <td>TS</td> <td>-</td> <td>83</td> <td>115</td> <td>70</td> <td>73</td> </tr> <tr> <td>VFA</td> <td>-</td> <td>6</td> <td>6</td> <td>6</td> <td>63</td> </tr> </tbody> </table> <p>The water consumption used in the mill is recorded and checked against the optimum level. Reasons for the irregularities usage were remarked accordingly.</p> <table border="1" data-bbox="1088 1066 1731 1394"> <thead> <tr> <th>Month</th> <th>FFB/mt</th> <th>water process/L</th> <th>Water boiler/L</th> <th>Water L/mt FFB</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>9948</td> <td>11140</td> <td>8669</td> <td>1.99</td> </tr> <tr> <td>Feb</td> <td>7434</td> <td>8595</td> <td>6560</td> <td>2.04</td> </tr> <tr> <td>Mac</td> <td>7419</td> <td>8914</td> <td>6195</td> <td>2.04</td> </tr> <tr> <td>April</td> <td>6263</td> <td>7556</td> <td>5411</td> <td>2.07</td> </tr> <tr> <td>May</td> <td>7133</td> <td>8395</td> <td>5461</td> <td>1.94</td> </tr> <tr> <td>June</td> <td>6103</td> <td>6439</td> <td>6363</td> <td>2.10</td> </tr> <tr> <td>July</td> <td>7357</td> <td>8557</td> <td>6218</td> <td>2.01</td> </tr> <tr> <td>Aug</td> <td>9243</td> <td>10323</td> <td>8642</td> <td>2.05</td> </tr> </tbody> </table>	Parameters	INQWS limit	25/2/2019		25/1/18		<i>Up stream</i>	<i>Down stream</i>	<i>Up stream</i>	<i>Down stream</i>	pH	5-9	7.0	7.0	7.0	7.4	COD	<100	ND	ND	ND	ND	BOD	<12	2.1	2.2	2	17	AN	<2.7	ND	ND	ND	ND	SS	ND	23	8	28	25	TS	-	83	115	70	73	VFA	-	6	6	6	63	Month	FFB/mt	water process/L	Water boiler/L	Water L/mt FFB	Jan	9948	11140	8669	1.99	Feb	7434	8595	6560	2.04	Mac	7419	8914	6195	2.04	April	6263	7556	5411	2.07	May	7133	8395	5461	1.94	June	6103	6439	6363	2.10	July	7357	8557	6218	2.01	Aug	9243	10323	8642	2.05	
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MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings					Compliance
		Sept	12066	13540	8373	1.82	
		Oct	12825	15212	6794	1.72	
		Nov	13443	16138	8698	1.85	
		Dec	11912	13961	7405	1.79	
		Total	111145	128770	84789	1.92	
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 -	The mill adopts a land application system on furrows. Area of application as stipulated in the DOE <i>Jadual Pematuhan</i> .					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; f) Quality, Environmental, Safety & Health & Sustainability Manual – 01/7/17 g) System Procedure – 01/1/2012 h) Procedure Manual – 02/1/2018 i) SOM Standard Operating Manual – 2013 j) Safe Operating Procedure – 01/1/2011 k) Environmental Control Procedure – 01/9/2018 l) Store Operating Manual – 2014 m) Jobs description - 2012					Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)



Criterion / Indicator		Assessment Findings	Compliance
		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 d) Despatch The business plan comprises established for horizon 2019-2022. a) Crop intake. b) Processing cost RM/mt c) Extraction rates.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		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 -	Genting Plantation has established 'Polisi Perolehan Tandan Buah Sawit'. The agreement were signed between the FFB supplier and the GSOM. In the agreement stated the pricing mechanism, payment period, payment method and FFB quality.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	The contracts have been detailed out the pricing and the conditions of the FFB to be supplied to the mill. In the agreement stated the payment period should be made to the FFB supplier on or before 12 days of the next month from the month FFB delivered to the mill. Sighted the Paymet Advice for FFB supplier A Rahman Harry bin Diong for the month of January and February 2019 were made on the 15/1/2019 and 15/2/2019. The payment period were more than agreed in the 'Polisi Perolehan Tandan Buah Sawit'. This indicates the payments are not paid in timely manner as per agreed contract.	Major NC
Criterion 4.6.4: Contractor			
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.	Genting Plantation has included terms of Compliance to MSPO Standards in the contract agreement for all contractors. Sighted the contract agreement for CPO transporter Chong Shu Min Trading, Landasan Kembar Sdn. Bhd and Juita Baru Sdn. Bhd.	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	The contractors has signed contract agreement before provide the service to the company. The copy of the agreement were available in the office for review. Sighted the contract agreement for CPO transporter Chong Shu Min Trading, Landasan Kembar Sdn. Bhd and Juita Baru Sdn. Bhd.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	Genting Plantation has agreed for BSI auditors to verify the assessment through a physical inspection if required.	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 Sabapalm Oil Mill Certification Unit complies with the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills. It is recommended that the certification of Genting Sabapalm Oil Mill and Genting Sabapalm Estate 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:  ARUNAN KANDASAMY SENIOR VICE PRESIDENT PLANTATION (MALAYSIA)	Signature:  Date: 8/7/2019
Date: 11/07/19	

Appendix A: Assessment Plan

PRELIMINARY AGENDA				
Date	Time	Subjects	MFM	AB
Sunday 10/03/2019	PM	Audit team travelling to Sandakan (AK 5196 – Arrive 2035)	√	√
Wednesday 13/03/2019 Sabapalm POM	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan 	√	√
	09.00 – 12.30	Sabapalm 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.	√	√
	12.30 – 13.30	Lunch	√	√
	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 14/03/2019 Sabapalm Estate	09.00 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√
	12.30 – 13.30	Lunch	√	√
	13.30 – 16.30	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)	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√
Friday	9.00 – 12.00	Stakeholder interviews (combined with estate’s stakeholders)	√	√
	12.00 – 14.00	Lunch and Friday Prayer	√	√
	14.00 – 15.00	Preparation of audit report	√	√
	15.00 – 16.30	Closing Meeting	√	√
	16.30	Traveling to Sandakan and to Kuala Lumpur	√	√

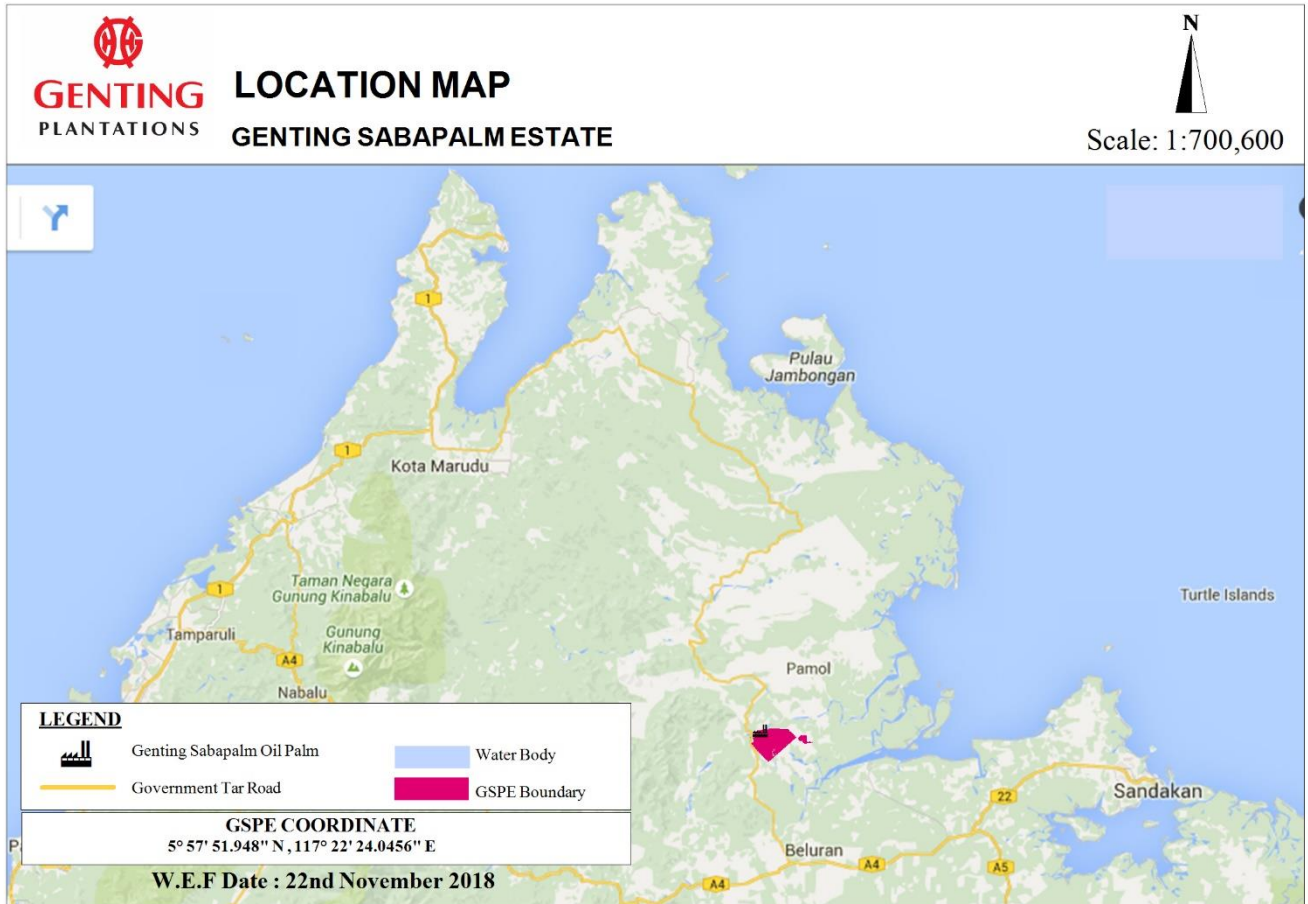
Appendix B: List of Stakeholders Contacted

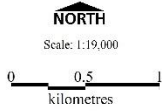
List of Stakeholders Contacted	
<p>Internal Stakeholders</p> <p>Estate managers Mill engineer Supervisors, Staff & Clerks Mill local & foreign workers (process, workshop, etc.) Estate local & foreign workers (harvesters, sprayers, etc.) Local workers representatives Foreign workers representatives Gender committee representative Crèche minder Estate Hospital Assistant</p>	<p>Union/Contractors/Local Communities</p> <p>MNK Sdn. Bhd. Landasan Kembar Sdn Bhd. Lup Kong Sdn. Bhd Kg. Tagas-Tagas Smallholders (FFB Suppliers)</p>
<p>Government Departments</p> <p>Pej. Perkhidmatan Veteriner, Beluran Imigresen Department, Sandakan Balai Polis Tagas-Tagas SK. Ladang Sabapalm SK. Tagas-Tagas</p>	<p>NGO</p>

Appendix C: Smallholder Member Details

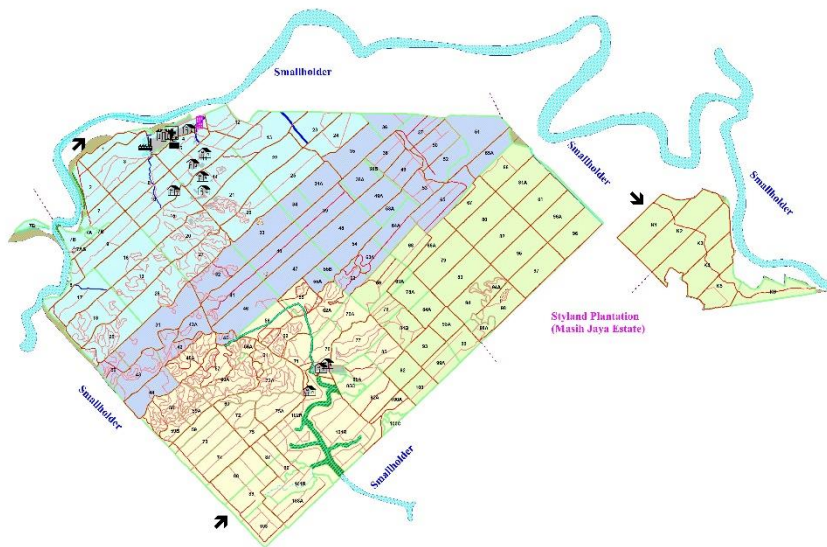
No	Name of smallholder	Year Planted	Land Area (ha)	Forecast FFB (Mt/ha/year)
1	NA			
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
TOTAL				

Appendix F: Location and Field Map





GPS MAP OF GENTING SABAPALM ESTATE



- LEGEND**
- Boundary Stone
 - Office
 - Nursery
 - Store
 - Liasite
 - Clinic
 - Mill
 - School / Humana
 - Mosque
 - Inlet of Major River
 - Outlet of Major River
 - Exit road Entrance
 - Block Boundary
 - Main Road
 - Submain Road
 - Stakeholder Boundary
 - Water Body
 - Riparian
 - Stream
 - Main Drain
 - Building/Infrastructure
 - Cattle Area
 - Quarry
 - Division Sapi
 - Division Kwan
 - Division Klagan
 - Division Bangkawat
 - Undeveloped Area



GSPE Coordinate : 5.965987 N, 117.374117 E

Projection : Longitude-Latitude
Datum : WGS 84
Data Source : Field Survey Using Garmin
Prepared by :
Genting Plantations Research Centre Sabah (GPRCS)
Date Updated : 15 July 2015

GENTING PLANTATIONS BERHAD
GENTING SABAPALM ESTATE
P. O. BOX NO. 901,
90701 SANDAKAN,
SABAH.

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