

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

<b>Genting Plantations Berhad</b>
Head Office: 10th Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
Certification Unit: <b>Genting SDC Sdn Bhd Genting Tanjung Palm Oil Mill &amp; Plantations including Genting Tanjung, Genting Tenegang, Genting Landworthy, Genting Layang &amp; Genting Bahagia Estate</b>
Location of Certification Unit: Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road 90200 Kinabatangan, Sabah, Malaysia

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

**Report Number: 8814292**

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

1.1 Organizational Information and Contact Person			
MPOB License	Genting Tanjung Mill: 595974115000 Genting Landworthy Estate: 503827102000 Genting Tanjung Estate: 502249802000 Genting Tenegang Estate: 504759802000		
Company Name	Genting Sdn Bhd – Genting Tanjung Oil Mill		
Address	Head office: 10th Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia Certification unit: Genting Tanjung Oil Mill, Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road, 90200 Kinabatangan, Sabah, Malaysia		
Group name if applicable:	Genting Plantations Berhad		
Subsidiary of (if applicable)	Genting SDC Sdn Bhd		
Contact Person Name	Mr Arunan Kandasamy (Senior Vice President-Plantations Malaysia)		
Website	<a href="http://www.gentingplantations.com/">http://www.gentingplantations.com/</a>	E-mail	
Telephone	03 2333 6510 (Head office) 089 567 091 (Genting Tanjung Oil Mill)	Facsimile	03 2333 6575 (Head office)

1.2 Certification Information			
Certificate Number	MSPO 680512 – Genting Tanjung Oil Mill MSPO 692777 – Genting Tanjung Estates		
Issue Date	09/08/2018	Expiry date	08/08/2023
Scope of Certification	Genting Tanjung Oil Mill: Production of Sustainable Palm Oil and Palm Oil Products Genting Tan Estate: Production of Sustainable Oil Palm Fruits		
Stage 1 Date	N/A (The certification unit is RSPO certified)		
Stage 2 / Initial Assessment Visit Date (IAV)	20-21 and 24/11/2017		
Continuous Assessment Visit Date (CAV) 1	21-24/11/2018		
Continuous Assessment Visit Date (CAV) 2			
Continuous Assessment Visit Date (CAV) 3			
Continuous Assessment Visit Date (CAV) 4			
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
GTOM, GTJE, GLWE, GLYE,	ISCC EU & ISCC PLUS	ASG Cert GmbH	12/01/2018

GBGE & GTGE: EU-ISCC-Cert- DE119- 60153796 ISCC-Plus-Cert- 60153796			
GTOM: ISO 9001:2008 ISO 14001:2004 OHSAS 18001:2007 MS1722	QMS EMS OHSAS OHSMS	SIRIM QAS International Sdn Bhd	14/09/2018 14/09/2018 24/02/2018 24/02/2018
RSPO 652320	RSPO P&C	BSI	10/1/2022

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<b>1.3 Location of Certification Unit</b>			
<b>Name of the Certification Unit</b>	<b>Site Address</b>	<b>GPS Reference of the site office</b>	
		<b>Latitude</b>	<b>Longitude</b>
Genting Tanjung Oil Mill	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road, 90200 Kinabatangan, Sabah, Malaysia	5° 25' 22.8" N	118° 16' 23.9" E
Genting Tanjung Estate (GTJE)	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road, 90200 Kinabatangan, Sabah, Malaysia	5° 25' 33.41" N	118° 10' 10.23" E
Genting Tenegang Estate (GTGE)	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road, 90200 Kinabatangan, Sabah, Malaysia	5° 20' 46.02" N	118° 13' 32.2" E
Genting Landworthy Estate (GLWE)	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road, 90200 Kinabatangan, Sabah, Malaysia	5° 25' 13.4" N	118° 18' 24.6" E
Genting Layang Estate (GLYE)	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road, 90200 Kinabatangan, Sabah, Malaysia	5° 25' 21.90" N	118° 14' 3.35" E
Genting Bahagia Estate (GBGE)	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road, 90200 Kinabatangan, Sabah, Malaysia	5° 21' 49.5" N	118° 16' 33.7" E

<b>1.4 Plantings &amp; Cycle</b>					
<b>Estate</b>	<b>Age (Years) - ha</b>				
	<b>0 - 3</b>	<b>4 - 10</b>	<b>11 - 20</b>	<b>21 - 25</b>	<b>26 - 30</b>
Genting Tanjung Estate (GTJE)	1,049.06	272.90	198.28	0	2,277.92
Genting Tenegang Estate (GTGE)	770.36	0	605.42	0	2,054.47
Genting Landworthy Estate (GLWE)	0	0	0	3,706.61	0
Genting Layang Estate (GLYE)	0	267.08	1,367.93	183.86	0
Genting Bahagia Estate (GBGE)	669.38	0	0	0	3,118.92
<b>Total (ha)</b>	<b>2,488.8</b>	<b>539.98</b>	<b>2,171.63</b>	<b>3,890.47</b>	<b>7,451.31</b>

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<b>1.5 FFB Production (Actual) and Projected (tonnage)</b>			
<b>Producer Group</b>	<b>Projected (Nov 2017 – Oct 2018)</b>	<b>Actual production (Nov 2017 – Oct 2018)</b>	<b>Projected production (Nov 2018 – Oct 2019)</b>
Genting Tanjung Estate (GTJE)	69,656.00	62,724.58	69,024.00
Genting Tenegang Estate (GTGE)	61,040	58,291.55	59,088.00
Genting Landworthy Estate (GLWE)	75,513.93	69,148.96	82,515.00
Genting Layang Estate (GLYE)	36,505	31,380.13	35,236.00
Genting Bahagia Estate (GBGE)	63,722.77	69,019.87	68,767.00
<b>Total</b>	<b>306,437.7</b>	<b>290,565.09</b>	<b>314,630</b>

<b>1.6 Certified Tonnage</b>			
<b>Mill Capacity: 60 MT/hr</b>	<b>Estimated (Nov 2017-Oct 2018)</b>	<b>Actual (Nov 2017- Oct 2018)</b>	<b>Forecast (Nov 2018 – Oct 2019)</b>
	<b>FFB</b>	<b>FFB</b>	<b>FFB</b>
	306,437.70	290,565.09	314,630
<b>SCC Model: IP</b>	<b>CPO (OER: 20.87 %)</b>	<b>CPO (OER: 20.79%)</b>	<b>CPO (OER: 21.06 %)</b>
	63,938.46	60,413.27	66,261.08
	<b>PK (KER: 6.14 %)</b>	<b>PK (KER: 5.45 %)</b>	<b>PK (KER: 5.37 %)</b>
	15,925.58	15,832.81	16,895.63

<b>1.7 Description of Supply Base</b>					
<b>Estate</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Genting Tanjung Estate (GTJE)	3,798.16	156.90	511.01	4,466.07	85.04
Genting Tenegang Estate (GTGE)	3,430.25	85.6	136.69	3,652.54	93.91
Genting Landworthy Estate (GLWE)	3,706.61	89.70	241.49	4,037.80	91.80
Genting Layang Estate (GLYE)	1,818.87	172.05	86.49	2,077.41	87.55
Genting Bahagia Estate (GBGE)	3,788.3	92.10	546.64	4,427.04	85.57
<b>Total</b>	<b>16,542.19</b>	<b>596.35</b>	<b>1,522.32</b>	<b>18,660.86</b>	<b>88.64</b>

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

BSI Services Malaysia Sdn Bhd has conducted the Annual Surveillance Assessment of Genting SDC Sdn Bhd – Genting Tanjung (Tenegang Group), located in Lahad Datu, Sabah comprising Genting Tanjung Oil Mill, and infrastructures.

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

The assessment is a combined assessment for the mill and the group of estates that is supplying to the mill. However the assessment criteria for the mill and the estates were separated following to the required standards. The certification assessment scope is Genting SDC Sdn Bhd – Genting Tanjung (Tenegang Group). This report is the combined report for Genting Palm Oil Mill and Genting Tanjung (Tenegang Group) estates.

The onsite assessment was conducted on 21-24/11/2018.

Based on the assessment result, Genting SDC Sdn Bhd – Genting Tanjung (Tenegang Group) complies with the MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders and MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill and recommended for certification to be continued.

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn Bhd,  
Unit 3, Level 10, Tower A  
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Tel +603 2242 4211 Fax +603 2242 4218  
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[www.bsigroup.com](http://www.bsigroup.com)

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

### Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 21-24/11/2018. The audit programme is included as Appendix A. The approach to the audit was to treat the Genting Tanjung Palm Oil Mill and its supply base as an MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, 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 and MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The estates or smallholders sample were determined based on formula  $N = 1.0\sqrt{y}$  where  $y$  is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula  $(\sqrt{y}) \times (z)$ ; where  $z$  is the risk factor (may defer from 1.0, 1.5 or 2.0 depending on risk),  $y$  is total number of group members and where  $z$  is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix C.

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

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

The assessment findings for this assessment are detailed in Section 4.2.



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

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

<b>1. Assessment Program</b>					
<b>Name (Mill / Plantation / Group smallholders)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 3)</b>
Genting Tanjung Oil Mill	✓	✓	✓	✓	✓
Genting Tanjung Estate		✓		✓	✓
Genting Tenegang Estate		✓	✓		✓
Genting Layang Estate	✓		✓		✓
Genting Bahagia Estate	✓		✓	✓	
Genting Landworthy Estate	✓	✓		✓	

**Tentative Date of Next Visit:** November 18, 2019 – November 21, 2019

**Total No. of Mandays:** 8.0

**BSI Assessment Team:****Valence Shem – Lead Auditor**

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

**Muhamad Nagiuddin Mazeli - Team Member**

He hold Bachelor of Science Horticulture at University Putra Malaysia. He has 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company. He is a trained as Safety and Health Officer, Food Safety System (FSSC and ISO 22000) for Mill and refineries, ISO 9001, ISO 45001 and already attend HCV training with Proforest. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation.

### Section 3: Assessment Findings

#### 3.1 Details of audit results

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

- 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 ASA 1, there were three (3) Major nonconformities, zero (0) minor non-conformity and one (1) OFI raised. The Genting Tanjung Palm Oil Mill and Supply Base submitted their Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity were 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.

<b>Finding Reference</b>	1706956-201810-M1	<b>Certificate Reference</b>	MSPO 680512
<b>Certificate Standard</b>	MS 2530:2013 Part-3	<b>Clause</b>	4.3.1.1 (MS:2530-Part 3)
<b>Category</b>	Major		
<b>Area/Process:</b>	As per public summary report.		
<b>Statement of non conformance:</b>	Some of the compliance to legal requirements was not clearly demonstrated.		
<b>Clause requirements</b>	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.		
<b>Objective evidence</b>	<p>1) Medical surveillance already been sent to Klinik Elopura Sdn Bhd. Inspection by Dr Shaji A/L Pratap Gopal (HQ/12/DOC/00/259) with total 48 Sprayer, 2 Mandore, 3 workshop, 2 Storekeeper, and 1 Genset operator. However, found Tanjung Estate did not send manuring operators for Biological Monitoring to OHD as per recommendation in CHRA Report (dated 2014).</p> <p>2) Found Chemical Exposure Monitoring was not conducted by Tanjung, Landworthy and Tenegang estates for Manuring (crystalline silica, Quartz) as per recommendation by CHRA report (dated 2014).</p> <p>3) At Tanjung Estate, it was found that chemicals kencis, Muhiron, Farmtrobin 250 in chemical register (30 August 2018) were not included in CHRA report [dated September 2014 done by Noormahani Harun and Zarul Akmar (JKKP HIE 127/171-2(154)/JKKP IH 127/171-2(236)].</p>		

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	<p>4) It was found that Landworthy and Tenegang estates did not notify the DOE regarding the utilization of generator sets as per Clean Air Regulation 2014 Section 5 (Obligation to notify) (1) An owner or occupier of a premises shall not, without giving prior written notification to the director general carry out any work on any premises that may result in source of emission.</p>
<p><b>Cause</b></p>	<ol style="list-style-type: none"> <li>1. Miscommunication &amp; misunderstanding on the requirement of medical surveillance for Manuring workers that the exercise can be conducted by the estate HA (Hospital Assistant).</li> <li>2. Failure to check and follow up on the recommendation in CHRA - to conduct Chemical Exposure Monitoring.</li> <li>3. The chemicals were initially intended for trial purpose in early 2018. Therefore, management decided to include it in the next CHRA which is due in 1-year period (Mac 2019).</li> <li>4. Inadequate knowledge on the requirement in Clean Air Regulation 2014.</li> </ol>
<p><b>Correction containment</b></p>	<ol style="list-style-type: none"> <li>1. All the manuring workers to be sent for medical check up by OHD (by 18<sup>th</sup> Jan 2019).</li> <li>2. To conduct Chemical Exposure Monitoring through appointed consultant (by 18<sup>th</sup> Jan 2019).</li> <li>3. The new chemicals to be included in the next CHRA assessment in Mac 2019.</li> <li>4. To notify DOE on the utilization of the generator sets.</li> </ol>
<p><b>Corrective action</b></p>	<ol style="list-style-type: none"> <li>1. Workers will be sent for medical surveillance as per recommendation in CHRA report. This to be followed up and verified by OSH officer.</li> <li>2. Recommendations set out in CHRA report will be complied accordingly. This to be followed up and verified by OSH officer.</li> <li>3. To conduct Supplementary CHRA whenever new chemicals are approved (by GPRC) for wide application, as stated in the OSH Procedure OM-GPB-10. GM to send memo to Estate Managers to inform OSH officer immediately whenever new chemicals are approved. Then OSH officer shall arrange for the supplementary CHRA conducted soonest possible.</li> <li>4. LRR (Legal Requirement Register) will be updated and complied.</li> </ol> <p>All above legal compliances will be checked during periodic OSH and Sustainability Internal Audit and follow up visit.</p>
<p><b>Assessment conclusion</b></p>	<p>Evidence submitted:</p> <ol style="list-style-type: none"> <li>1) List of 37 manuring workers from Genting Tanjung Estate whom have been sent to a private clinic for medical surveillance and a sample of medical report. The check-up was conducted on 16/1/2019.</li> <li>2) An appointment letter from Genting Plantations' Vice President-Plantation (Sabah Region 2) dated 5/3/2019 [ref.: GPOS/VPGM/019/2K19] to a company to conduct the chemical exposure monitoring (CEM) for three estates. The CEM is expected to be conducted on 25/3/2019.</li> <li>3) A letter of confirmation dated 14/1/2019 from an awarded consultant to conduct the CHRA. Based on the letter, the assessment is expected to commence on 25/3/2019 and report is expected to be ready in July 2019.</li> <li>4) An appointment letter from Genting Landworthy Estate's Sr. Estate Manager dated 19/3/2019 [ref.: GLWE/VMS/19/071] to a company to prepare all the pre-</li> </ol>

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	<p>requisites of notification to DOE with regards to possession of 2 units of generator set.</p> <p>The evidence submitted was found to be sufficient. Nonetheless, the effectiveness of implementation of corrective action plan shall be verified in the next assessment. Thus, the major NCR is closed on 25/3/2019.</p>
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<b>Finding Reference</b>	1706956-201810-M2	<b>Certificate Reference</b>	MSPO 680512
<b>Certificate Standard</b>	MS 2530:2013 Part-3	<b>Clause</b>	4.4.5.3 (MS:2530-Part 3)
<b>Category</b>	Major		
<b>Area/Process:</b>	As per public summary report.		
<b>Statement of non conformance:</b>	The rate/day paid to some workers for public holiday did not meet the Minimum Wages Order 2016.		
<b>Clause requirements</b>	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.		
<b>Objective evidence</b>	Based on pay slips for the month of May, July & October 2018 at Tanjung & Tenegang estates, the payment for public holidays did not meet the Minimum Wages Order 2016 for some workers i.e. checkers and drivers. They were paid RM30/day and RM18/day respectively, instead of RM35.38/day.		
<b>Cause</b>	The driver, checkers and mandores 'base rate' for normal days are set lower than RM 35.38 due to their commissions per mt FFB. However, the formula was wrongly applied for PH too.		
<b>Correction containment</b> /	<ul style="list-style-type: none"> <li>- All the affected workers to be topped up in their next salary - Nov 2018.</li> <li>- GENPIT to amend the system to pay according to the minimum wage for PH, SL &amp; AL.</li> </ul>		
<b>Corrective action</b>	<ol style="list-style-type: none"> <li>1. Sustainability Dept to follow up and ensure GENPIT change the logic of PH, SL &amp; AL to be based on 'at least' minimum wage. While waiting for the changes by GENPIT, OUs to ensure PH, SL &amp; AL are to be paid (manually) based on the current minimum wage. This to be verified by Sustainability Dept every month.</li> <li>2. Detail Sustainability Internal Audit on workers' pay and conditions.</li> </ol>		
<b>Assessment concussion</b>	<p>Evidence submitted:</p> <ol style="list-style-type: none"> <li>1) An approval notification from Genting Plantations' Vice President-Plantation (Sabah Region 2) to Genting Tanjung and Genting Tenegang estates to reimburse the underpaid wages for the affected workers. The payslips showing the reimbursement have been made were also submitted to the audit team.</li> <li>2) A screenshot of Lintramax system to show that the wage for public holiday has been corrected by the person in-charge.</li> </ol> <p>The evidence submitted was found to be sufficient. Nonetheless, the effectiveness of implementation of corrective action plan shall be verified in the next assessment. Thus, the major NCR is closed on 25/3/2019.</p>		

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<b>Finding Reference</b>	1706956-201810-M3	<b>Certificate Reference</b>	MSPO 680512
<b>Certificate Standard</b>	MS 2530:2013 Part-4	<b>Clause</b>	4.3.1.1 (MS:2530-Part 4)
<b>Category</b>	Major		
<b>Area/Process:</b>	As per public summary report.		
<b>Statement of non conformance:</b>	Some of the compliance to legal requirements was not clearly demonstrated.		
<b>Clause requirements</b>	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.		
<b>Objective evidence</b>	<p>1) It was found that 2 sampled employees (E00084 and E00062) have their total overtime more than the permitted limit [ref.: permit #600-1/2/13/78 (08/KBN/2018-068)] i.e. 120 hours/month, for the month of May, July and October 2018.</p> <p>2) Found Tanjung Oil Mill operation not dispose SW 408 properly as per EQA 1974 Scheduled waste Reg 2005 example burn contaminate shredded empty bunch (spill kit) as fire starter for Boiler.</p>		
<b>Cause</b>	<p>(1)</p> <ul style="list-style-type: none"> <li>- Over time (OT) exceeded 120 hours due to longer working hours caused by boiler overhaul (in August 2018), peak crop (in October 2018) and overhead electrical problems (in July 2018).</li> </ul> <p>(2)</p> <ul style="list-style-type: none"> <li>- Inadequate understanding on the detail of the legal requirement Sch. Waste Regulation.</li> <li>- Handling of contaminated spill kit waste not covered in Sch. Waste procedure.</li> </ul>		
<b>Correction containment /</b>	<p>1) - To ensure OT do not exceed 104 hours/month by monitoring their OT on weekly basis.</p> <ul style="list-style-type: none"> <li>- To obtain workers consent letter and acknowledgement before work exceeding 104 hours.</li> </ul> <p>2) Immediately collect all contaminated shredded empty bunch from all Spill Kit and include it in the monthly inventory eSWIS.</p>		
<b>Corrective action</b>	<p>(1)</p> <ul style="list-style-type: none"> <li>- Weekly monitoring of OT to ensure total whole month not exceed 120 hours.</li> <li>- To include "Permit Kerja Lebih Masa" into Monitoring and Measurement so that we do not miss out the monitoring and action taken if not comply.</li> </ul> <p>(2)</p> <ul style="list-style-type: none"> <li>- Amend Sch. Waste procedure to include the contaminated spill kit waste SW408.</li> <li>- Training on the amended Sch. Waste procedure and SW Regulation.</li> </ul>		

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	To check all the effectiveness during the Sustainability Committee meeting every 6 months.
<b>Assessment conclusion</b>	<p>Evidence submitted:</p> <p>1) Genting Tanjung POM's "Overtime Monitoring Record" showing that the total of overtime work done by workers are monitored and ensured not exceeding the permitted amount. A letter from the Sr. Mill Manager to the workers notifying them not to do overtime work more than the regulated limit.</p> <p>2) eSwis Inventory Record (5<sup>th</sup> Schedule) showing that SW408 has been included in the inventory on 27/11/2018 and training records dated 27/11/2018 on handling of SW408.</p> <p>The evidence submitted was found to be sufficient. Nonetheless, the effectiveness of implementation of corrective action plan shall be verified in the next assessment. Thus, the major NCR is closed on 25/3/2019.</p>

<b>Finding Reference</b>	1706956-201810-I1	<b>Certificate Reference</b>	MSPO 680512
<b>Certificate Standard</b>	MS 2530:2013 Part-4	<b>Clause</b>	4.4.5.11 (MS:2530-Part 3)
<b>Category</b>	Opportunity for Improvement		
<b>Area/Process:</b>	As per public summary report.		
<b>Details</b>	The maintenance of septic tanks at labour line-sites of all the visited estates can be further improved by having them visible. Some of the septic tanks were fully covered with soil and their locations were unable to be traced.		

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Noteworthy Positive Comments	
1.	Positive comments from all stakeholders interviewed
2.	Good cooperation from all personnel during the assessment process

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

<b>Finding Reference</b>	1555465-201709-M1	<b>Certificate Reference</b>	MSPO 680512
<b>Certificate Standard</b>	MS 2530:2013 Part-4	<b>Clause</b>	MSPO Part 4: 4.3.1.1
<b>Category</b>	Major		
<b>Area/Process:</b>	Genting Tanjung Oil Mill and its supply base		
<b>Details:</b>	Compliance with applicable state laws and regulation was not effectively demonstrated.		
<b>Objective evidence:</b>	<p>Referring to "Permit Wanita Bekerja Malam" under section 75, Labour Ordinance (Sabah Cap 67), serial number:05(0016)SDK dated 28/7/18 with regards to transport and night shift allowance.</p> <p>No evidence of night shift allowance paid in the pay slip for the month the following:</p> <p>i) A1005763 - February 2017: low production month, night shift (6-11/2/17, 20-25/2/17, August 2017: normal production month, night shift (20-23/8/17, 7-13/8/17), October 2017: peak production month, night shift (2-8/10/17, 16-21/10/17, 29-31/10/17)</p> <p>ii) B3158734 - February 2017: low production month, night shift (6-11/2/17, 20-25/2/17, August 2017: normal production month, night shift (20-26/8/17, 7-12/8/17), October 2017: peak production month, night shift (2-7/10/17, 16-21/10/17, 29-31/10/17)</p> <p>Based on workers and management interview, there was no free transport provided for women that work on night shift. No agreed compensation amount as alternative if no free transport provided for women that work on night shift.</p>		
<b>Cause</b>	Overlooked on the detail of the requirement in the 'Permit Wanita Kerja Malam', the previous evaluation of compliance with legal and other requirements that was not properly done since no detail of conditions of requirements need to be complied with.		
<b>Correction / containment</b>	Application for exemption of permit conditions were made to JTK on 20.12.2017. While waiting on JTK's response, consultation made with women employee work on shift and agreements made with decision management to pay both shift allowance and transport allowance at the rate of RM0.50 each effective		



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	1.11.2017.
<b>Corrective action</b>	The evaluation of compliance with legal and other requirements that was not properly done has been improved by detailing each conditions required to be complied with on the legal register prior to evaluation.
<b>Assessment conclusion</b>	The submitted evidences were found to be sufficient, thus NC is effectively close on 20/2/18
<b>Verification in this assessment</b>	Corrective action was found to be continuously implemented and no recurrence of issue. Thus, the NC remains closed.

<b>Finding Reference</b>	1555465-201709-M2	<b>Certificate Reference</b>	MSPO 680512
<b>Certificate Standard</b>	MS 2530:2013 Part-4	<b>Clause</b>	MSPO Part 3: 4.4.5.6
<b>Category</b>	Major		
<b>Area/Process:</b>	Genting Tanjung Oil Mill and its supply base		
<b>Details:</b>	Evidence of fair contracts that have been signed by both employee and employer was not effectively demonstrated		
<b>Objective evidence:</b>	<p>Refer to Sabah OUs "Perjanjian Pekerjaan" , Employment Contract para 10; " Pekerja harian (tidak termasuk pekerja borong/pajak) jika diberi arahan dan kelulusan bertulis oleh majikan untuk bekerja pada hari rehatnya atau hari cuti umum, pekerja berhak mendapat bayaran gaji pada kadar berikut":</p> <p>a) Pada hari rehat - 2 kali ganda;</p> <p>b) Pada hari cuti umum - 3 kali ganda.</p> <p>Sample of contract checked:</p> <p>i) Genting Bahagia Estate (B1104118, A6778643, AS259435, AS369872, AT680829, AT680829, AT245388)</p> <p>ii) Genting Landworthy Estate (AT 681340, EB 5779176)</p> <p>iii) Genting Layang Estate (AT 681368, AT245056, AT696581)</p>		
<b>Cause</b>	The management is guided by group policy where 'piece' rated workers are not offered to work on Rest Day/Public Holiday		
<b>Correction / containment</b>	<p>1. The Employment Agreement - Clause 10 to be amended as follows, by HRAD: " PEKERJA Harian dan PEKERJA Borongan/Pajak jika diberi arahan dan kelulusan bertulis oleh MAJIKAN untuk bekerja pada hari rehatnya atau hari Cuti Umum, PEKERJA berhak mendapat bayaran gaji pada kadar berikut:</p> <p>(a) Pada hari Rehat - 2 kali ganda gaji harian atau harga borong/pajak</p> <p>(b) Pada hari Cuti Umum - 3 kali ganda gaji harian atau harga borong/pajak "</p> <p>2. To issue an addendum (on the above latest changes) to all the existing workers, and brief them accordingly, by 29th Dec 2017.</p>		
<b>Corrective action</b>	<p>HRAD to issue the latest amended Employment Agreement (v3.0) by 29th Dec 2017, for implementation by all OUs at Sabah.</p> <p>To ensure regular monitoring and compliance on Sabah Labour Ordinance 2005</p>		

<b>Assessment conclusion</b>	The submitted evidences were found to be sufficient, thus NC is effectively close on 20/2/18
<b>Verification in this assessment</b>	Corrective action was found to be continuously implemented and no recurrence of issue. Thus, the NC remains closed.

<b>Finding Reference</b>	1555465-201709-M3	<b>Certificate Reference</b>	MSPO 680512
<b>Certificate Standard</b>	MS 2530:2013 Part-4	<b>Clause</b>	MSPO Part 3: 4.4.5.9
<b>Category</b>	Major		
<b>Area/Process:</b>	Genting Tanjung Oil Mill and its supply base		
<b>Details:</b>	Wages payment was not in line with legal regulations.		
<b>Objective evidence:</b>	<p>Genting Bahagia Estate: Sampled of harvester, mandore and bunch checker payslip and cross checked with harvesting interval book, check roll book and bunch checker's record found that the number of days of harvesters who worked on rest day were not properly documented. Further trail in the bunch checker records, the following workers bunch count recorded as per below:</p> <p>i) Employee No.: AS 369872, bunch count: 422 on 16/10/17, rest day on 15/10/17</p> <p>ii) Employee No.: AT 680829, bunch count: 450 on 23/10/17, rest day on 22/10/17</p> <p>iii) Employee No.: AT 245388, bunch count: 371 on 9/10/17, rest day on 8/9/17 iv)Employee No.: A 6778643, bunch count: 299 on 9/10/17, rest day on 8/9/17 Verified with bunch counter (AT245886) payslip for October 2017, he has worked for 31 days in October 2017 inclusive of rest day and public holiday. Based on interview with mandore and the said workers, they have confirmed that they worked on rest day without formal instruction from management. Document checked on the bunch counters' payslip and harvester found that there were some different where the bunch counters were paid double rate of its daily rate whereas harvesters were paid on normal rate for their piece per rate on the next day.</p>		
<b>Cause</b>	The management is guided by group policy where 'piece' rated workers are not offered to work on Rest Day/Public Holiday		
<b>Correction / containment</b>	Consultation made with piece-rated employee to explain that estate management to offer Sunday work only during peak crop period as per memorandum by GM effective 1.12.2017.		
<b>Corrective action</b>	<p>Management decided to revised the policy to be only if instructed by management, all piece-rate workers work on rest day shall be paid double including where for harvesters, the bunches harvested on Rest Day (Sunday) will be recorded as harvested on Sunday and entitled for double rate.</p> <p>The evaluation of compliance with legal and other requirements has been improved detailing each conditions required to be complied with on the legal register prior to evaluation</p>		

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<b>Assessment conclusion</b>	The submitted evidences were found to be sufficient, thus NC is effectively close on 20/2/18
<b>Verification in this assessment</b>	Corrective action was found to be continuously implemented and no recurrence of issue. Thus, the NC remains closed.

<b>Finding Reference</b>	1555465-201709-M4	<b>Certificate Reference</b>	MSPO 680512
<b>Certificate Standard</b>	MS 2530:2013 Part-4	<b>Clause</b>	MS4.5.3.2
<b>Category</b>	Major		
<b>Area/Process:</b>	Genting Tanjung Oil Mill and its supply base		
<b>Details:</b>	Waste management and disposal plan is not implemented effectively.		
<b>Objective evidence:</b>	Genting Bahagia Estate Sighted traces of oil on the ground surrounding the oil trap at the division 6 (diesel storage tank).		
<b>Cause</b>	Wrong design of oil trap outlet had caused the waste oil overflowed		
<b>Correction / containment</b>	Re-designed and reconstructed the oil trap for effective functioning.		
<b>Corrective action</b>	Conduct an annually training to the storekeeper on managing pollution control devices as per SMP-GPB-31-00		
<b>Assessment conclusion</b>	The submitted evidences were found to be sufficient, thus NC is effectively close on 20/2/18		
<b>Verification in this assessment</b>	Corrective action was found to be continuously implemented and no recurrence of issue. Thus, the NC remains closed.		

**3.4 Issues Raised by Stakeholders**

IS #	Description
1	<p><b>Feedbacks:</b>            Good relationship between the neighbouring estates (Anchor, Malbumi and Yu Kuang) and no issues with regards to boundaries, trespassing etc.</p> <p><b>Management Responses:</b>            Information acknowledged by the management.</p> <p><b>Audit Team Findings:</b>            No further issue.</p>

**3.5 Summary of the Nonconformities and Status**

CAR Ref.	CLASS	ISSUED	STATUS
1555465-201709-M1	Major	21/11/2017	Closed
1555465-201709-M2	Major	21/11/2017	Closed
1555465-201709-M3	Major	21/11/2017	Closed
1555465-201709-M4	Major	21/11/2017	Closed
1706956-201810-M1	Major	24/11/2018	Closed
1706956-201810-M2	Major	24/11/2018	Closed
1706956-201810-M3	Major	24/11/2018	Closed

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

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

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	A policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	Policy of MSPO for Genting Plantations is available in Landworthy, Tanjung and Tenegang Estate dated 18 March 2014 approve by President Mr Yong Chee Kong.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. <b>- Major compliance -</b>	As per Ind 4.1.1.1 the Genting MSPO policy is emphasize on the commitment to continual improvement with the objective of improving the estate operation cover in Safety, Social and environment.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	Internal Audit in Land worthy estate have been conduct on 17 until 19 October 2018, 3 NCR is highlighted by Internal auditor regarding issue on open burning in housing complex and also Domestic waste issue.	Complied
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of	Internal Audit procedure is available under SMPM ( sustainability management procedure manual) document no SMP-GPB-03 dated 25 May 2018. All action have been taken for issue that have been	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	nonconformities, in order to implement the necessary corrective action. <b>- Major compliance -</b>	raised during internal.	
<b>4.1.2.3</b>	Report shall be made available to the management for their review. <b>- Major compliance -</b>	Management review already done on 19 Nov 2018 followed as per SMPM under Management review Doc no SMP-GBP-06 dated 25 may 2018	Complied
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. <b>- Major compliance -</b>	Management review already done on 19 Nov 2018 as per SMPM under Management review Doc no SMP-GBP-06 dated 25 may 2018.	Complied
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. <b>- Major compliance -</b>	The action plan for continual improvement is based on a consideration of the main social and environmental impact such as waste reduction, water consumption and other is available dated on 16 October 2018	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.1.4.2	<p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p><b>- Major compliance -</b></p>	<p>The Complaint and grievances procedure is available in SMPM under doc no SMP-GPB-19 dated 21 March 2018 and for consultation and communication is under doc no SMP-GPB-17 dated 23 Feb 2018. The implementation is verified during audit and workers interview.</p>	Complied
4.1.4.3	<p>An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established.</p> <p><b>- Major compliance -</b></p>	<p>Action plan is available in Land Worthy Estate, the action plan is cover for environment, workers needs, safety and others. Sampling on environment continuous action such as minimize use of pesticide, in GLWE using cattle for control weed.</p>	Complied
<b>4.2 Principle 2: Transparency</b>			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	<p>The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.</p> <p><b>- Major compliance -</b></p>	<p>Genting Tanjung group of estates is transparent and open to communicate its information on environmental, social and legal issues relevant to sustainability practice to the public, e.g.</p> <ul style="list-style-type: none"> <li>• Company annual report</li> <li>• Group policies</li> <li>• Reports related to environment i.e. EAI (Environmental Aspect Impact Assessment), EIA (environmental Impact Assessment) etc.</li> <li>• MSPO/RSPO external audit reports</li> <li>• Pollution prevention plan</li> <li>• Continuous improvement plan</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>• Complaints and grievances book and its procedure</li> <li>• Negotiation and compensation procedure</li> <li>• Sexual harassment procedure</li> <li>• Estate/mill maps and land titles</li> <li>• Any reports or information related to HCV area</li> <li>• Any reports or information related to social i.e. SIA</li> <li>• RSPO internal audit report</li> </ul> <p>This is addressed in its Sustainability Management Procedure Manual, Procedures on Request and Responses [SMP-GPB-25, rev. 00, 14/8/2014]. Means of communication is spelt out in clause 3.1.1 of the procedure e.g. meetings, telephone, walk in to office, letter, e-mail, fax, etc.</p>	
<b>4.2.1.2</b>	<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><b>- Major compliance -</b></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 GSE's "Enquiry Register Book" (ref.: Clause 3.1.2 of the above procedure). Verification of the book showed that there has been no request made of the above mentioned subjects ever since the last assessment.</p>	Complied
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p><b>- Major compliance -</b></p>	<p>Procedure is available entitled Sustainability Management Procedure Manual, Procedure for Consultation and Communication [SMP-GPB-17, rev. 02, 23/2/2018].</p>	Complied
<b>4.2.2.2</b>	<p>A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.</p>	<p>All issues and grievances are handled by the Manager of the each operating unit. If the issue be beyond the manager jurisdiction, it</p>	Complied



Criterion / Indicator		Assessment Findings	Compliance
	- <b>Minor compliance</b> -	shall be forwarded to the Head Office.	
<b>4.2.2.3</b>	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.  - <b>Major compliance</b> -	The list of stakeholders was last updated in October 2018 for all the visited estates and contains more than 90 number of stakeholders each which consists of government agencies, suppliers/contractors, FFB suppliers and surrounding communities. Ever since the last assessment, there have been various meetings with the stakeholders e.g. on 15/10/2018 (external stakeholders – government agencies), 22/10/2018 (external stakeholders – contractors & suppliers), 1/11/2018 (internal stakeholders). Minutes of meetings were available for verification. Generally, among the agenda discussed were legal compliance issues, FFB pricing mechanism, harvesting standard, safety and environmental issues, sustainability standard requirements (e.g. RSPO P&C, MSPO, ISCC) and handling of complaints/grievances mechanism.	Complied
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).  - <b>Major compliance</b> -	The traceability implementation is addressed in a procedure, SMPM, Traceability (Estate) [SMP-GPB-09, rev. 4, 24/8/2018].	Complied

Criterion / Indicator		Assessment Findings	Compliance
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	Inspection on compliance with the traceability procedure is regularly checked through supply chain internal audit. The internal audit report, which was carried out together with other schemes such as RSPO and ISCC, was available for verification.	Complied
<b>4.2.3.3</b>	The management should identify and assign suitable employees to implement and maintain the traceability system. <b>- Minor compliance -</b>	The Estate Managers are the person assigned to implement and maintain the traceability system.	Complied
<b>4.2.3.4</b>	Records of sales, delivery or transportation of FFB shall be maintained. <b>- Major compliance -</b>	The records and documents related to FFB traceability such as bunch chit, weighbridge tickets and daily FFB delivery records were adequately maintained.	Complied
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
<b>4.3.1.1</b>	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. <b>- Major compliance -</b>	The visited estates continued their commitment in complying with the legal requirements. Among the evidence of compliance verified were:  - GTGE's Permit Potongan Daripada Gaji Pekerja, Seksyen 113(4), Ordinan Buruh (Sabah Bab 67), Serial No.: 11(0996)SDK, validity 28/7/2017 to 27/7/2018 – application to	Non-conformance

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	<p>JTK Kota Kinabatangan for renewal received on 20/7/2018 by the dept. (by Mr. Suriong Sudirman) – but official recommendation from JTK KK (memo #JTK.H.KBN.600-14/1/119, dated 31/7/2018) has been received – content: recommended for approval.</p> <ul style="list-style-type: none"> <li>- In GLWE, the Workplace Inspection in GLWE already conduct on 3 Oct 2018 before is followed as per OSH Act 1996.</li> <li>- Air compressor in GTNE, SB PMT 10351 is available and valid until 29 Nov 2019, DOSH visit latest is dated on 30 August 2018 visit by M. Syarein.</li> <li>- GTNE's KPDNKK license for Diesel is available for 18000 Litre as per PPDNKK.SDK.23/2005(SK) BL22018019990 under Siri S014401 valid from 9 May 2018 until 8 May 2019.</li> </ul> <p>However found implementation mechanism from sampling estate is not followed as per Legal and Other Requirement Register as per below detail:-</p> <ul style="list-style-type: none"> <li>- Found Clean Air Regulation 2014 is not been updated in LORR for Land Worthy estate and found certain estate is not notify the DOE regarding as per Clean Air Regulation 2014 Section 5 (Obligation to notify) (1) An owner or occupier of a premises shall not, without giving prior written notofocation to the director general.</li> <li>- Medical surveillance already been sent to Klinik Elopura Sdn Bhd. Inspection by Dr Shaji A/L Pratap Gopal (HQ/12/DOC/00/259) with total 48 Sprayer, 2 Mandore, 3</li> </ul>	

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		<p>workshop, 2 Storekeeper, and 1</p> <ul style="list-style-type: none"> <li>- Genset operator however found Tanjung Estate did not send manuring operator to Biological Monitoring to OHD as per recommendation CHRA Report.</li> <li>- Found Chemical Exposure Monitoring is not been conduct by Tanjung estate, Land Worthy Estate and Tenegang Estate for Manuring (crystalline silica, Quartz) as per recommendation by CHRA report.</li> </ul> <p>Thus, a non-conformity report was assigned due to his lapse.</p>	
<b>4.3.1.2</b>	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>In GLWE and also GTJE, the list all laws applicable to their operations in a legal requirements register is available and updated 27 March 2018.</p>	Complied
<b>4.3.1.3</b>	<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><b>- Major compliance -</b></p>	<p>In GLWE the legal requirements register already be updated for Employment Insurance System Act 2017, Minimum wages 2018 and Sabah Forest Enactment 1968 dated 14 Oct 2018.</p>	Complied
<b>4.3.1.4</b>	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p><b>- Minor compliance -</b></p>	<p>In Land Worthy Estate, management already assign Tracy Bungan as responsible to monitor compliance and to track update the changes in regulatory requirements dated 12 October 2017.</p> <p>In Tenegang Estate, Cik Roslinah Anginti (Chief clerk) already been assign as LRR ( Legal Requirement Register) as per appointment letter dated 22 Feb 2017.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p><b>- Major compliance -</b></p>	<p>GLWE            CL095316975, lease period 1/1/1985 to 31/12/2083, 4,039 Ha, leasee: Landworthy Sdn Bhd – in accordance to MPOB License #503827102000, Landworthy Sdn Bhd (Sri Landworthy Estate), 4,039 Ha</p> <p>GTJE            CL095316993, lease period 1/1/1988 to 31/12/2086, 8,094 Ha, leasee: Tanjung Bahagia Sdn Bhd – shared with Genting Bahagia Estate i.e. 4,273.87 Ha for GTJE and 3,820.04 Ha for GBGE            CL095327129, lease period 1/1/1998 to 31/12/2096, 192.40 Ha, leasee: Kinavest Sdn Bhd</p> <p>GTGE            CL095317463, lease period 1/1/1990 to 31/12/2088, 4,047 Ha, leasee: Genting Tanjung Bahagia Sdn Bhd – in accordance to MPOB License #504760102000, Genting Tanjung Bahagia Sdn Bhd, 3,652.54 Ha (where 394.41 Ha registered under Genting Layang’s license #504759802000)</p>	<p>Complied</p>
<b>4.3.2.2</b>	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p><b>- Major compliance -</b></p>	<p>Stated in the land title i.e. “The said land is demised herein expressly and only for the purpose of the cultivation of an agricultural crop of economic value”.</p>	<p>Complied</p>
<b>4.3.2.3</b>	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where</p>	<p>The legal parameter boundary is clearly demarcated and visibly maintained verified as per site visit verification on 22 Nov 2018 at</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
	practicable. - <b>Major compliance</b> -	Block 18 div 15 in Land Worthy Estate. The Perimeter boundary in Tanjung estate is visible available and already verified as per coordinate N 05 27'07.7" E 118 14'57.1"	
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - <b>Minor compliance</b> -	No dispute – surrounded by other plantation companies i.e. IOI Merisem, Wingking Plantation, Ace Foremost JC Chang's Hwa Li estates.	Complied
<b>Criterion 4.3.3 – Customary rights</b>			
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. - <b>Major compliance</b> -	No land is encumbered by customary rights.	NA
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - <b>Minor compliance</b> -	No land is encumbered by customary rights.	NA
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - <b>Major compliance</b> -	No land is encumbered by customary rights.	NA
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	<p>Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.</p> <p><b>- Minor compliance -</b></p>	<p>The Social assessment for all the visited estates was conducted internally by the Sustainability Department. The last SIA was conducted in October 2018. Key areas identified in the SIA were on economic livelihood/quality of life, environment and health, wellbeing and community, families and individuals. Both positive and negative impacts were identified in the SIA.</p> <p>The recommendation from the SIA report was transferred to action plan. The action plan identified the issues &amp; strategies, action plan, responsible person and time frame for both positive and negative impact.</p> <p>Only 1 negative impacts identified:</p> <ol style="list-style-type: none"> <li>1) stray dog at line-site – still pending answer from Majlis Daerah Kinabatangan – concern from internal stakeholder</li> <li>2) Energy Commission (EC) – to get the installation of electric fencing for elephant or cattle registered to EC branch.</li> </ol>	Complied
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p><b>- Major compliance -</b></p>	<p>A system for dealing with complaints and grievances is written under Sustainability Management Procedure Manual, SMPGPB-17: Procedures for Consultation and Communication, rev:02 dated 23/2/2018.</p>	Complied
<b>4.4.2.2</b>	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by</p>	<p>All complaints were resolved in timely manner. Acknowledgement by signatures of the complainant were available in the</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	all parties. - <b>Major compliance</b> -	complaint/grievance book form.	
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - <b>Minor compliance</b> -	Recorded in Complaint/Grievance Book. All the lodged complaints have been addressed accordingly.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - <b>Minor compliance</b> -	Made aware through stakeholders meetings. Minutes of meeting were available for verification.	Complied
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - <b>Major compliance</b> -	Recorded in Complaint/Grievance Book. All the lodged complaints have been addressed accordingly.	Complied
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - <b>Minor compliance</b> -	Since the last assessment, among the contribution to local development were: Genting Plantations Bhd: Monetary donation to HUMANA for Teachers Day celebration on 12/3/2018	Complied



Criterion / Indicator		Assessment Findings	Compliance
		<p>GLWE:</p> <ul style="list-style-type: none"> <li>• Contribution of cattle and monetary to workers on Hari Raya Aidil Adha and Hari Raya Aidil Fitri</li> <li>• Organizing a Labour Day celebration (1<sup>st</sup> May) for workers</li> <li>• Incentive (in form of 10 kg of rice) to the productive harvester (monthly)</li> <li>• Appointing HUMANA to provide education to the children of foreign workers</li> </ul> <p>GTJE:</p> <ul style="list-style-type: none"> <li>• Organizing a Labour Day celebration (1<sup>st</sup> May) for workers</li> <li>• Organizing Christmas Day on 17/12/2017</li> <li>• Appointing HUMANA to provide education to the children of foreign workers</li> </ul>	
<b>Criterion 4.4.4: Employees safety and health</b>			
<b>4.4.4.1</b>	<p>An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>Policy for safety is available in Genting Tanjung POM and Suppliers dated 1 July 2018 approved by Tan Wee Kok (President and COO for Genting plantation), the management communicated policy by training.</p> <p>Latest record training for policy is available dated 13 April 2018 trained by Muhd Syafiq and Rodymin Budon in GLWE.4</p> <p>Interview with staff and workers revealed that all working SOPs being consistently implemented among all employees and monitored by the management through daily muster briefing, training and etc. List sampled SOPs available during onsite assessment sighted as following:-</p> <p>- Safe Operating Procedure (SOP) issued on Dec 2011 cover for</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
	<p>Best Practice for Genting Plantations Berhad</p> <ul style="list-style-type: none"> <li>- OSH Manual for GLWE is available prepared by Andy Wan (JKKP IS 127/438/2/3246)dated 1 January 2010.</li> <li>- Oil Palm Manual dated March 2018 (Revision 5)</li> </ul>	
<p><b>4.4.4.2</b></p> <p>The occupational safety and health plan shall cover the following:</p> <ul style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risks of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:               <ul style="list-style-type: none"> <li>i. all employees involved shall be adequately trained on safe working practices</li> <li>ii. all precautions attached to products shall be properly observed and applied</li> </ul> </li> <li>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).</li> <li>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and</li> </ul>	<p>Policy for safety is available in Genting Tanjung POM dated 1 July 2018 approved by Tan Wee Kok (President and COO for Genting plantation), the management communicated policy by training dated 13 Januari 2018 trained by En Mogan A/L Arwananthan attended by 481 including management staff.</p> <p>CHRA dated September 2014 done by Noormahani Harun and Zarul Akmar (JKKP HIE 127/171-2(154)/JKKP IH 127/171-2(236)).</p> <p>Chemical register is available dated 30 August 2018, found chemical kencis, Muhiron, Farmtrobin 250 and etc. is not been include in CHRA report.</p> <p>In Tenegang estate, sampling on Manuring workers Sumriani ( No 5019) and Suharni (No. 111789) already been sent to Medical surveillance On 5 May 2018 at Dr Shaji A/L Pratap gopal (HQ/12/DOC/00/259) from Klinik Elopura Sdn Bhd. From the result they are fit to work for MOP or fertiliser.</p> <p>For 2018 in Tanjung Estate, no record of JKKP 6, only accident less than 4 days is available. Found 2 cases reported for under 4 day LTI accident, on August and September 2018. HIRARC already been reviewed on 28 August 2018 for accident ( General work unit) on 20 August 2018 and another accident at harvesting unit (6 September 2018) the HIRARC review is on 13 September 2018</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>OSH minute meeting have been conduct on 26 September 2018. The meeting is conduct quarterly and previous record is 5 June 2018 and 15 March 2018. Appoint letter for OSH committee is available, sampling on En Mohd Ikhwan Ab Ghani as chairman dated 1 January 2018.</p> <p>For ERT(Emergency Response Team) Is available in Tanjung estate. Its divided by 6 team including for Fire Fighting team and First aid team. The appointment letter is available, sampling for En Mastodin bin Kiwin as First Aid Team head dated 29 March 2018 and En Simon Anginti as Fire Fighter dated 29 March 2018.</p> <p>Emergency Response Plan Is available in Tanjung estate, under file Prosedur Melapor Kes-Kes Kemalangan dated 12 July 2018</p>	

**Criterion 4.4.5: Employment conditions**

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>Covered under Genting Plantations’ Social Policy (Incorporating the Labour and Human Rights requirements), dated 22/6/2015, signed by Mr. Yong Chee Kong (President and Chief Operating Officer). Various methods of communication implemented by the estate to communicate the policy to its employees such as display on notice boards, briefing and training.</p>	Complied
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>Based on interview with employees from different backgrounds, there is no evidence that the management engage in or support any discriminatory practices. The commitment to no discrimination is also stated in the company’s social policy.</p>	Complied
4.4.5.3	<p>Management shall ensure that employees’ pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>The rate/day paid to some workers for public holiday did not meet the Minimum Wages Order 2016. Based on pay slips for the month of May, July &amp; October 2018 at Tanjung &amp; Tenegang estates, the payment for public holidays did not meet the Minimum Wages Order 2016 for some workers i.e. checkers and drivers. They were paid RM30/day and RM18/day respectively, instead of RM35.38/day. Thus, a non-conformity report was assigned due to this lapse.</p>	Non-conformance
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p>	<p>The pay for employees of contractors was monitored by the management through obtaining the pay slips from the contractors for all their workers. Based on sampled workers under employment of: FFB transporter (Man Foo Hing)’s, the pay was found to be in accordance to legal requirements.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	Employee data base is kept and maintained in the computer system (Lyntramax). All the required information by this standard was available in the data based.	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	Employment contracts were available in language that understood by the workers. The contract has the details about the payments and employment conditions such as period of working, working hour, medical assistance, housing, holiday, annual leave, period of notice to terminate the contract, etc.	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	Time recording for estate’s workers was done by the field staff by using the daily check roll. The check roll has the information about attendance, type of work and overtime of every worker.	Complied
4.4.5.8	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p>	Working hours and breaks were found to be in line with the legal requirement. Normal working hour is from 0530 hour to 1330 hour and a flexible an hour break in between is given.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.  - Major compliance -	Based on sampled pay slips as mentioned in 4.4.5.3, lapses were found with regards to wages and overtime payment for some workers.	Non-conformance raised under 4.4.5.3
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.  - Minor compliance -	Other benefits such as motorcycle allowance and turn-out incentives were provided by the employer and verifiable in the pay slips. The establishment of estate clinic provides the medical care for the workers and their dependents. Education through HUMANA school is provided for foreign workers dependents.	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.  - Major compliance -	The workers quarters was found to be habitable and in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446). Treated potable water and electricity were provided to the housing for free of charge.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.4.5.12</b>	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p><b>- Major compliance -</b></p>	<p>Sexual Harassment Policy has been established dated 3/8/2009 and signed by the Chief Operating Officer. The awareness of this policy among the workers was made through displaying of the policy at notice boards and briefing by the field staff from time to time at the muster ground. Presentation material related to sexual harassment and attendance records dated 13/4/2018 were made available for verification.</p>	Complied
<b>4.4.5.13</b>	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p><b>- Major compliance -</b></p>	<p>No trade union at the visited estates. However, workers were aware of their right to join union.</p>	Complied
<b>4.4.5.14</b>	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not be exposed to hazardous working conditions.</p> <p><b>- Major compliance -</b></p>	<p>Based on the records in the employees data base system, which has the information about date of birth and date join, there was no children and young person being employed.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.  - Major compliance -	Training that contractor have been attend for MSPO and RSPO is on 12 Oct 2018. Trained by Yasijo Mohd Ali for Tanjung estate and for Tenegang estate the information regarding to MSPO and other such as environment and safety awareness is been communicate during Stakeholder meeting on 19 September 2018, attended by 8 contractor.	Complied
<b>4.4.6.2</b>	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.  - Major compliance -	Similar method for identifying the training needs are used in operating units both estates and the mill. The training needs for both GLWE and Tanjung Estates for the FY 2018 training program has been established. 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.  The training need for worker is been evaluate by management to ensure the training is applicable for workers. Sampling on sprayer dated train conduct is on 25 Sept 2018 for chemical handling training.	Complied
<b>4.4.6.3</b>	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.	The training programme is available dated 5 Jan 2018, This training programme is included for Sprayer, Manures, driver, contractor and others.	Complied



Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
<b>4.5.1.1</b>	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.  - Major compliance -	Environmental Policy is available dated 5 Oct 2009 approved by Yong Chee Kong. EM is available in Tenegang estate for replanting 2016 with 256.44 hectare, the report ( AEC ref no. JPAS/PP/06/600-1/11/1/226) by Chemsain Konsultant Sdn Bhd dated 20 Oct 2017	Complied
<b>4.5.1.2</b>	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations.  - Major compliance -	The environmental management plan is available as per Environmental Impact assessment already been done on June 2018 by Chemsain Konsultant Sdn Bhd (ref: CK EV403-4329/17). This action plan cover for replanting from year 2019 until 2028 with total 3707.23 ha.	Complied
<b>4.5.1.3</b>	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.  - Major compliance -	For Environmental Impact assessment already been done on June 2018 by Chemsain Konsultant Sdn Bhd (ref: CK EV403-4329/17) this assessment cover for 3707.23 Ha replanting area for next year. For the aspect impact evaluation already updated Aug 2018.	Complied
<b>4.5.1.4</b>	A programme to promote the positive impacts should be included in the continual improvement plan.	For environmental positive and continuous plan is available dated 16 Oct 2018, Sampling on Soil erosion prevention, the action to be taken is to avoid land clearing in high risk erosion area such as slope and soil type that not suitable.	Complied

Criterion / Indicator		Assessment Findings	Compliance												
	- Minor compliance -														
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 -	Recycle training is done on 2 Nov 2018 trained by Muhamad Syafiq (Doc No. GL WE/SOP/RECYCLE – 25). The Triple rinsing training dated 9 Oct 2018 attended with total 10 person trained by Khuzairi(BayerSdn Bhd). Training on MSPO and RSPO at Tanjung estate dated 22 Oct 2018 by Muhd Syafiq b. Jupri.	Complied												
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.  - Major compliance -	In Land Worthy Estate the management is regular meetings with employees where their concerns about environmental quality are discussed latest dated on 12 Oct 2018. In this meeting already discuss regarding to environmental such as oil spillage during lorry maintenance, river buffer zone and etc.	Complied												
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>															
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.  - Major compliance -	The Consumption of non-renewable energy is been optimized and closely monitored by establishing baseline values and trends already been observed within an appropriate timeframe as per detail below:-  <table border="1" data-bbox="1010 1134 1733 1359"> <thead> <tr> <th></th> <th>2017</th> <th>2018 (To-date Oct 2018)</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>75968.13</td> <td>54371.44</td> </tr> <tr> <td>Diesel</td> <td>103271</td> <td>57576</td> </tr> <tr> <td>Diesel/FFB</td> <td>1.36</td> <td>1.06</td> </tr> </tbody> </table>		2017	2018 (To-date Oct 2018)	FFB	75968.13	54371.44	Diesel	103271	57576	Diesel/FFB	1.36	1.06	Complied
	2017	2018 (To-date Oct 2018)													
FFB	75968.13	54371.44													
Diesel	103271	57576													
Diesel/FFB	1.36	1.06													

Criterion / Indicator		Assessment Findings	Compliance
		Diesel Usage plan is available dated 12 Nov 2018 prepared by Mohamad Narin Shah. Its plan to monitor condition for tractor and keep maintenance, monitor diesel usage for reduction objective.	
<b>4.5.2.2</b>	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.  - <b>Major compliance</b> -	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets.	Complied
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible.  - <b>Minor compliance</b> -	There was no opportunity to use renewable energy in Tanjung and Land worthy estate.	Complied
<b>Criterion 4.5.3: Waste management and disposal</b>			
<b>4.5.3.1</b>	All waste products and sources of pollution shall be identified and documented.  - <b>Major compliance</b> -	The waste product already been identified by operating unit under Identification, segregation and temporary storage of waste such as recycle organic, Scheduled waste 404,409,410,408 and etc. For recycle organic generate from Domestic waste and dispose at landfill for Tanjung estate referred as per <i>Jadual &amp; Rekod Pengangkutan Sampah Kawasan Perumahan</i>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <ul style="list-style-type: none"> <li>a) Identifying and monitoring sources of waste and pollution</li> <li>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</li> </ul> <p><b>- Major compliance -</b></p>	<p>In Tanjung estate, referred as per <i>Jadual &amp; Rekod Pengangkutan Sampah Kawasan Perumahan</i> latest record is on 31 October 2018, domestic waste have been collected by Aswadi with Lorry registration no GB02 at House block A,B,C,D,E,F,G and H and disposed at field Block 8 with 4 trip of collection for this day.</p>	Complied
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><b>- Major compliance -</b></p>	<p>Inventory Scheduled waste is available, sampling on SW 404 and 408 record at GLWE. The latest inventory record is dated 9 Nov 2018 and for disposal record for SW 404 disposal dated is on 12 Oct 2018 at Sedafiat Sdn Bhd and for SW 408 is dated disposal is on 22 June 2018 by Lagenda Bumimas Sdn Bhd. License for Lagenda Bumimas Sdn Bhd (003440) is available and valid until 30 April 2019.</p>	Complied
4.5.3.4	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p><b>- Major compliance -</b></p>	<p>In Genting plantation the empty pesticide containers have been punctured and disposed at Lagenda Bumimas Sdn Bhd. It followed as per Standard Operating Procedure(SOP) dated January 2011 under title; <i>Proses Penghapusan Bekas – Bekas Kosong Bahan Kimia/Racun</i>. As per disposal record in Tanjung estate is on 18 May 2018 as per consignment note B000886.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - <b>Minor compliance</b> -	Under the action plan of the waste management plan, collection and disposal of domestic waste is handled by Tanjung estate management. Collection is 2 to 3x/week	Complied
<b>Criterion 4.5.4:</b> 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. - <b>Major compliance</b> -	For assessment for greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent is been assess on Jan 2018. The total emission that been generate is 5.79 tCO <sub>2</sub> e/t product for CPO and PK.	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - <b>Major compliance</b> -	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 Sustainability team and implemented in all estates and mills for all the applicable practices. This document was established on 20 Sept 2018 and remain effective for practice in all estates.	Complied
<b>Criterion 4.5.5:</b> Natural water resources			
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a	From water sampling report for Sungai Tenegang under ref GTOM/LAB/01/09 found the result of BOD and COD is according to Jadual Pematuhan for Genting Tanjung Mill dated 26 Sept 2018 analysis by KDC lab of KL-Kepong (Sabah) Sdn Bhd. The monitoring for Sg Tenegang is conduct 6 monthly once as per SMPM (SMP-GPB-15 dated 12 November 2014).  For Drinking water, done by ITS (Envilab Sdn Bhd) latest sampling	Complied

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<p>frequency that reflects the estate’s current activities.</p> <p>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p><b>- Major compliance -</b></p>	<p>dated on 14 Sept 2018 previously report is on 19 June 2018, quarterly reviewed, the result is fit to drink.</p> <p>For protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones is verified during site visit at Sg Tenegang, Sg Tenegang Besar and Sg Layang Bisut.</p> <p>For all estate (Land Worthy, Tenegang and Tanjung estate) not using bore well as water supply. They are using water catchment as water supply.</p>	
<p><b>4.5.5.2</b> No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p><b>- Minor compliance -</b></p>	<p>Based on site visit, no construction of bunds, weirs and dams across main rivers (Sg. Tenegang Besar and Sg Layang Bisut ) or waterways passing through the estate.</p>	<p>Complied</p>
<p><b>4.5.5.3</b> Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).</p> <p><b>- Minor compliance -</b></p>	<p>The road Side drain and pit SOP is available under Knowledge Enhancement Programme title Marking of new roads on Hilly replanting areas dated 26 July 2018. From the site verification estate is implement the road site pit as per procedure.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<b>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</b>		
<p><b>4.5.6.1</b> Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <ul style="list-style-type: none"> <li>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</li> <li>b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</li> </ul> <p><b>- Major compliance -</b></p>	<p>HCV report- by Dr Yap Son Kheong from S.K yap Forestry Landscape Advisory Services dated 14 July 2010 For Land Worthy Estate has HCV 4.2 Buffer zone.</p> <p>In Tanjung Estate the HCV area available under HCV 1.2, HCV 1.4, HCV 3, HCV4.1 at Baha Sanctuary and HCV 4.2 (buffer zone Sg Tenegang).</p> <p>In Tenegang estate, The HCV area is Sg Simpang Putih, Sg Layang Bisut and Sg Ulu Tenegang is under HCV 4.2.</p>	<p>Complied</p>
<p><b>4.5.6.2</b> If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <ul style="list-style-type: none"> <li>a) Ensuring that any legal requirements relating to the protection of the species are met.</li> <li>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</li> </ul> <p><b>- Major compliance -</b></p>	<p>Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented. Signage as well as routine patrolling activities were utilised as part of creating awareness among employees and maintain HCVs. Latest record training for workers is on 2 October 2018 also on 2 November 2018 during stakeholder meeting also have been mention regarding to HCV.</p> <p>In Tanjung estate also there are monitoring is been done by management record. From monitoring record dated 2 Oct 2018 is done by Roslan Bin Rahman found no issue at HCV area.</p>	<p>Complied</p>

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4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. <b>- Major compliance -</b>	The HCV training already been done on 5 June 2018 by Samli Kapa and Yasito. For latest HCV Training dated 12 Nov 2018. This training is referred as per Sustainability Management Procedure Manual Doc No SMP-GPB-14.	Complied
<b>Criterion 4.5.7: Zero burning practices</b>			
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. <b>- Major compliance -</b>	The Genting Group policy of “Zero open burning” is established on 10 August 2011 approved by Yong Chee Kong . The operating units adhered to the policy of “Zero open burning” for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. Tenegang Estate has a replanting program OP to OP plantation as per the management crop program. Furthermore Estate Team (VMO, Medical Assistant, Auxillary Police, Assistant and Staff) to ensure no open burning happen in estate.	Complied
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. <b>- Major compliance -</b>	Not applicable because no replanting. The replanting will be conduct on 2019	Complied
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws.	Not applicable because no replanting. The replanting will be conduct on 2019	Complied



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	- Major compliance -		
4.5.7.4	<p>Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.</p> <p>- Minor compliance -</p>	<p>Not applicable because no replanting. The replanting will be conduct on 2019.</p> <p>As per monitoring at Tenegang estate replanting at Div 12 at block 49,51,52 and 56, the previous crops should already been mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.</p>	Complied
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Site Management</b>			
4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>Replanting Manual is available under Oil Palm Manual dated June 2013 under title of land clearing, preparation, planting and legume covers establishment. However not applicable for GLWE because no replanting. The replanting will be conduct on 2019.</p>	Complied
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 is 100% flat area which was observed during field visit and as per Digital Slope &amp; Contour Map. Planting of cover crop, EFB, POME are made to retain the soil structure and conservation.</p>	Complied
4.6.1.3	<p>A visual identification or reference system shall be established for each field.</p>	<p>All fields are marked and identified. Information like year planting (field no) and the total hectare is shown in all markers. There are both stencilled at the palm trees and also displayed in signages at the boundary/corners of every fields. This is observed during the</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	field visit in Tenegang Estate.	
<b>Criterion 4.6.2:</b> Economic and financial viability plan			
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	The annual business plan is available. Tenegang estate had an annual budget with a 5 year projection as stated in Tenegang Estate Replanting programme for 2019 until 2023. This business plan is prepared as guidance for future planning. The budget contains palm year of planting, age categories, and FFB production.	Complied
<b>4.6.2.2</b>	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance -	The replanting programme is available in Tenegang estate for 5 years from 2019 until 2023 with total hectare is 2260ha.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.2.3	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> <li>a) Attention to quality of planting materials and FFB</li> <li>b) Crop projection: site yield potential, age profile, FFB yield trends</li> <li>c) Cost of production : cost per tonne of FFB</li> <li>d) Price forecast</li> <li>e) Financial indicators : cost benefit, discounted cash flow, return on investment</li> </ul> <p><b>- Major compliance -</b></p>	<p>This requirement i.e. crop material, crop projection, yield, production cost are available.</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><b>- Major compliance -</b></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. The management also provides variance report on the performance and reviewed on a monthly basis. The supervisory personnel maintained a daily cost for the field operations.</p>	Complied
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
4.6.3.1	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p><b>- Major compliance -</b></p>	<p>Pricing mechanism for product and services was normally done through opened tender or comparison of quotations. So far there has been no complaint lodge by suppliers or service providers with regards to the pricing mechanism.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	<p>Sampled tender for replanting work at GTJE: A contractor has been awarded (Harimaju Sdn Bhd) where a signed agreement dated 1/9/2018 (#GTJE/MOA/RP/18/02) was verified. Verification of Contract Progress Payment Requisition form, Enter Purchase Invoice and Enter Ledger Transaction showed that the payment to the contractor was made on timely manner.</p> <p>Sampled tender for replanting work at GTGE: A contractor has been awarded (Low Seow Weng Development Co.) where a signed agreement dated 4/6/2018 (#GTGE/MOA/RP/2018/01) was verified. Verification of Contract Progress Payment Requisition form, Enter Purchase Invoice and Enter Ledger Transaction showed that the payment to the contractor was made on timely manner.</p>	Complied
<b>Criterion 4.6.4: Contractor</b>			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. <b>- Major compliance -</b>	Awareness and understanding about the MSPO requirements were given to the contractors through stakeholder meetings. Last meeting was conducted on 22/10/2018 and attended by more than 20 suppliers/contractors. Minutes of meeting were available decumbently Based on interviews, contractors were able to demonstrate a good understanding of the MSPO requirements.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	e.g. A contractor has been awarded (Harimaju Sdn Bhd) where a signed agreement dated 1/9/2018 (#GTJE/MOA/RP/18/02) – where clause 2.3 requires the contractor to conform the requirements related to RSPO, ISCC, MSPO, OSHA 1994, FMA 1967 and EQA 1974.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	Genting Tanjung has no objection to allow BSI auditors to verify the assessment through physical inspection if required.	Complied
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	Delivery of task is verified by the estate before proceed for payment. Verification of Joint Evaluation and Verification form showed that checking of tasks were done and acknowledged by the contractors.	Complied
<b>4.7 Principle 7: Development of new planting</b> Not applicable since there is no new planting at all the estates under Genting Tanjung certification unit.			

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

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	Policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	Policy of MSPO for Genting Plantations is available in Tanjung Oil Mill dated 18 March 2014 approve by President Mr Yong Chee Kong.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. <b>- Major compliance -</b>	As per Ind 4.1.1.1 the Genting MSPO policy is emphasize on the commitment to continual improvement with the objective of improving the milling operation cover in Safety, Social and environment.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	Internal Audit have been conduct on 17 until 19 October 2018, 2 Observation is highlighted by Internal auditor regarding issue on housekeeping for equipment at workshop.	Complied
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.	Internal Audit procedure is available under SMPM ( sustainability management procedure manual) document no SMP-GPB-03 dated 25 May 2018.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<b>- Major compliance -</b>		
<b>4.1.2.3</b>	Reports shall be made available to the management for their review. <b>- Major compliance -</b>	Management review already done on 19 Nov 2018 followed as per SMPM under Management review Doc no SMP-GBP-06 dated 25 may 2018.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. <b>- Major compliance -</b>	Management review already done on 19 Nov 2018 followed as per SMPM under Management review Doc no SMP-GBP-06 dated 25 may 2018.	Complied
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. <b>- Major compliance -</b>	The action plan for continual improvement is based on a consideration of the main social and environmental impact such as waste reduction, water consumption and other is available dated on 7 November 2018.	Complied
<b>4.1.4.2</b>	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. <b>- Major compliance -</b>	The Complaint and grievances procedure is available in SMPM under doc no SMP-GPB-19 dated 21 March 2018 and for consultation and communication is under doc no SMP-GPB-17 dated 23 Feb 2018. The implementation is verified during audit and workers interview.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<b>4.2 Principle 2: Transparency</b>		
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements		
<b>4.2.1.1</b>	<p>The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.</p> <p><b>- Major compliance -</b></p> <p>Genting Tanjung Palm Oil Mill is transparent and open to communicate its information on environmental, social and legal issues relevant to sustainability practice to the public, e.g.</p> <ul style="list-style-type: none"> <li>• Company annual report</li> <li>• Group policies</li> <li>• Reports related to environment i.e. EAI (Environmental Aspect Impact Assessment), EIA (environmental Impact Assessment etc.</li> <li>• MSPO/RSPO external audit reports</li> <li>• Pollution prevention plan</li> <li>• Continuous improvement plan</li> <li>• Complaints and grievances book and its procedure</li> <li>• Negotiation and compensation procedure</li> <li>• Sexual harassment procedure</li> <li>• Estate/mill maps and land titles</li> <li>• Any reports or information related to HCV area</li> <li>• Any reports or information related to social i.e. SIA</li> <li>• RSPO internal audit report</li> </ul> <p>This is addressed in its Sustainability Management Procedure Manual, Procedures on Request and Responses [SMP-GPB-25, rev. 00, 14/8/2014]. Means of communication is spelt out in clause 3.1.1 of the procedure e.g. meetings, telephone, walk in to office, letter, e-mail, fax, etc.</p>	<p>Complied</p>



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Criterion / Indicator		Assessment Findings	Compliance
<b>4.2.1.2</b>	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.  - <b>Major compliance</b> -	The management documents which are publicly available are mentioned in Indicator 4.2.1.1. Any request of information shall be recorded in GSE’s “Enquiry Register Book” (ref.: Clause 3.1.2 of the above procedure). Verification of the book showed that there has been no request made of the above mentioned subjects ever since the last assessment.	Complied
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication with the relevant stakeholders.  - <b>Major compliance</b> -	Procedure is available entitled Sustainability Management Procedure Manual, Consultation and Communication [SMP-GPB-17, rev. 02, 23/2/2018].	Complied
<b>4.2.2.2</b>	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> .  - <b>Minor compliance</b> -	All issues and grievances are handled by the manager of the operating unit where in this case, the Sr. Mill Manager (Mr Lee Kar Leong). If the issue be beyond the manager jurisdiction, it shall be forwarded to the Head Office. This is addressed in Clause 3.9 of the procedure.	Complied
<b>4.2.2.3</b>	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.  - <b>Major compliance</b> -	The list of stakeholders was last updated in October 2018 and contains more than 140 number of stakeholders which consists of government agency, suppliers/contractors, FFB suppliers and surrounding communities. Ever since the last assessment, there have been three meetings with the stakeholders i.e. on 15/10/2018 (external stakeholders – government agencies), 22/10/2018 (external stakeholders – contractors & suppliers) and 12/3/2018 (external stakeholders) and 1/11/2018 (internal stakeholders). Minutes of meetings were available for verification. Generally, among the agenda discussed were legal compliance issues, FFB	Complied

Criterion / Indicator		Assessment Findings	Compliance
		pricing mechanism, harvesting standard, safety and environmental issues, sustainability standard requirements (e.g. RSPO P&C, MSPO, ISCC) and handling of complaints/grievances mechanism.	
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.  - <b>Major compliance</b> -	The traceability implementation is addressed in a procedure, SMPM, Supply Chain and Traceability (Mill) [SMP-GPB-23, rev. 7, 24/8/2018].	Complied
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system.  - <b>Major compliance</b> -	Inspection on compliance with the traceability procedure is regularly checked through supply chain internal audit. The internal audit report, which was carried out together with other schemes such as RSPO and ISCC, was available for verification.	Complied
<b>4.2.3.3</b>	The management shall identified and assign suitable employees to implement and maintain traceability system.  - <b>Minor compliance</b> -	The Mill Manager is the person assigned to implement and maintain the traceability system.	Complied
<b>4.2.3.4</b>	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.  - <b>Major compliance</b> -	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel are maintained in various forms such as: <ul style="list-style-type: none"> <li>• Mass Balance Worksheet – monthly input</li> <li>• Local Sales Delivery Advice (LSDA)</li> <li>• Incoming FFB Records</li> <li>• Outgoing CPO Records</li> <li>• Outgoing PK Records</li> </ul>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<b>4.3 Principle 3: Compliance to legal requirements</b>		
<b>Criterion 4.3.1 – Regulatory requirements</b>		
<b>4.3.1.1</b>	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p><b>- Major compliance -</b></p> <p>The visited estates continued their commitment in complying with the legal requirements. Among the evidence of compliance verified were:</p> <ul style="list-style-type: none"> <li>- Latest workers housing inspection is 12 Nov 2018, 5 Nov 2018 and 29 Oct 2018 is been done by HA(Mastodin Kiwin).</li> <li>- Audiometric test record previously send on 13 Nov 2017 at DAB OH Sdn Bhd by Dr Mohd Azizan Bin Abdul Aziz ( JKPP HIE 127/12/4/04-12)(HQ/10/DOC/00/167), total worker involve is 24 workers. All are fit to work accept 3 workers (Azlan Ambo, Damrah Beda dan Hasan Muhamad) and JKPP 7 is available. HIRARC review dated 9 August 2018.</li> <li>- OSH meeting have been conduct on quarterly and latest is on 18 Sept 2018. Previously conduct on 26 June 2018 and 5 March 2018 as per OSHA 1996</li> </ul> <p>Nonetheless, some lapses were found as follows:</p> <ul style="list-style-type: none"> <li>- Tanjung Oil Mill operation not dispose SW 408 properly as per EQA 1974 Scheduled waste Reg 2005 example burn contaminate shredded empty bunch (spill kit) as fire starter for Boiler.</li> <li>- 2 sampled employees (E00084 and E00062) have their total overtime more than the permitted limit [ref.: permit #600-</li> </ul>	<p>Non-conformance</p>

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		1/2/13/78 (08/KBN/2018-068)] i.e. 120 hours/month, for the month of May, July and October 2018.  Thus, a non-conformity report was raised.	
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register.  <b>- Major compliance -</b>	Under Document no; SMP-GPB-22 revision 6 dated 28 May 2018 the legal is available covered as for Employment act, Safety and Health act, Immigration act and etc. Latest workers housing inspection is 12 Nov 2018, 5 nov 2018 and 29 Oct 2018 is been done by HA (Mastodin Kiwin).	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.  <b>- Major compliance -</b>	The Legal and Other Requirement is new updated for Employment Insurance scheme (EIS) dated 2 Feb 2018.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.  <b>- Minor compliance -</b>	A mechanism to ensure compliance to legal and other requirement has been documented in procedures on regional, national and international laws (SMP-GPB-21; dated 14th Aug 2018). In Genting Tanjung POM, management already assign Elbert Tay Kuang Te as responsible to monitor compliance and to track update the changes in regulatory requirements dated 14 March 2017.	Complied
<b>Criterion 4.3.2 – Lands use rights</b>			
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.  <b>- Major compliance -</b>	The Genting Tanjung POM is sited within Genting Tanjung Estate land banks at block 10, division 1 of Genting Tanjung Estate. Total area for POM is 21.75 ha and verified through area statement and quit rent.	NA

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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. <b>- Major compliance -</b>	Refer to 4.3.2.1. Total area for POM is 21.75 ha and verified through area statement and quit rent.	NA
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. <b>- Major compliance -</b>	Mill is located inside Genting Tanjung Estate and sharing the estate boundary. All the boundaries are visibly maintained as per company SOP. Site visit to the block 1 and confirmed that the boundary stone are well maintained and clearly demarcated verified as per site visit verification on 21 Nov 2018.  In Genting Tenegang Estate Field visit to block 23 noted that boundary is visibly maintained and verified during the visit. Legal boundaries are clearly demarcated and visibly maintained throughout the estate.	NA
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). <b>- Minor compliance -</b>	There is no land dispute recorded. This was verified with stakeholders' consultation.	NA
<b>Criterion 4.3.3 – Customary rights</b>			
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.	No land is encumbered by customary rights.	NA

Criterion / Indicator		Assessment Findings	Compliance
	<b>- Major compliance -</b>		
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. <b>- Minor compliance -</b>	No land is encumbered by customary rights.	NA
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. <b>- Major compliance -</b>	No land is encumbered by customary rights.	NA
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. <b>- Minor compliance -</b>	<p>The Social assessment for Genting Tanjung Palm Oil Mill (GTOM) was conducted internally by the Sustainability Department. The last SIA was conducted in October 2018. Key areas identified in the SIA were on economic livelihood/quality of life, environment and health, wellbeing and community, families and individuals. Both positive and negative impacts were identified in the SIA.</p> <p>The recommendation from the SIA report was transferred to action plan. The action plan identified the issues &amp; strategies, action plan, responsible person and time frame for both positive and negative impact.</p> <p>Only 2 negative impacts identified:</p> <ol style="list-style-type: none"> <li>1) expensive price of goods at sundry shop – pricelist is available to countercheck any complaint – since last assessment, no complaint about expensive goods price</li> <li>2) stray dog – issue is handled together with estate</li> </ol>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.4.2:</b> Complaints and grievances			
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented. <b>- Major compliance -</b>	System for dealing with complaints and grievances is spelt out in Sustainability Management Procedure Manual, Complaints and Grievances [SMP-GPB-19, rev. 2, 5/9/2014].	Complied
<b>4.4.2.2</b>	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. <b>- Major compliance -</b>	The system was found to be effective in managing complaints. Ever since the last assessment, there were more than 10 complaints which all of them were on housing facility repair by workers.	Complied
<b>4.4.2.3</b>	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. <b>- Minor compliance -</b>	Complaint forms were available in Complaints/Grievances Record Book. The format includes the information such as name of complainant, passport/NRIC, phone no., address, issue, date of complaint, details of action taken, verification by manager and acknowledgement by complainant.	Complied
<b>4.4.2.4</b>	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. <b>- Minor compliance -</b>	Surrounding communities were made aware of the mechanism of handling complaints through stakeholders meeting. This was recorded in the minutes of meeting.	Complied
<b>4.4.2.5</b>	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. <b>- Major compliance -</b>	Records of complaints were maintained in the Complaints/Grievances Record Book and records for the past 24 months were still available.	Complied

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<b>Criterion 4.4.3:</b> Commitment to contribute to local sustainable development		
<b>4.4.3.1</b>	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.  <b>- Minor compliance -</b>	Contribution to local development is combined with the estate. See Indicator 4.4.3.1 of MSPO Part 3.  Complied
<b>Criterion 4.4.4:</b> Employees safety and health		
<b>4.4.4.1</b>	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.  <b>- Major compliance -</b>	Policy for safety is available in Genting Tanjung POM dated 1 July 2018 approved by Tan Wee Kok (President and COO for Genting plantation), the management communicated policy by training. Latest record (PM-MGR-05-F02-0) is on 19 Oct 2018 attended by 133 workers trained by Heric Evans Gabu Jusilin (engineer).  Interview with staff and workers revealed that all working SOPs being consistently implemented among all employees and monitored by the management through daily muster briefing, training and etc. List sampled SOPs available during onsite assessment sighted as following:-  - Safe Operating Procedure issued on 10 August 2016 under Document no GTOM –SOP-MGR-01 cover from Security (SOP-MGR-01) until Extraction (SOP-LAB-06).  - System Procedure dated 1 August 2017, this manual cover from HIRARC (SP-MGR-01) until Communication(SP-MGR-13).  Complied



Criterion / Indicator	Assessment Findings	Compliance
<p><b>4.4.4.2</b> The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risk of all operations shall be assessed and documented.</li> <li>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"> <li>i. All employees involved are adequately trained on safe working practices;</li> <li>ii. All precautions attached to products should be properly observed and applied;</li> </ul> </li> <li>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).</li> <li>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.</li> <li>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of</li> </ul>	<p>Policy for safety is available in Genting Tanjung POM dated 1 July 2018 approved by Tan Wee Kok (President and COO for Genting plantation), the management communicated policy by training. Latest record (PM-MGR-05-F02-0) is on 19 Oct 2018 attended by 133 workers trained by Heric Evans Gabu Jusilin (engineer).</p> <p>OSH Plan Is available dated 1 January 2018 with objective to maintain working environment safe without risk and health, training requirement and commitment.</p> <p>Training Needs and plan is available for Genting Tanjung POM dated 5 Jan 2018. Sampling from training for NADOPOD training record dated 2 April 2018 attended by 9 person trained by Constance Joe.</p> <p>Audiometric test record previously send on 13 Nov 2017 at DAB OH Sdn Bhd by Dr Mohd Azizan Bin Abdul Aziz ( JKKP HIE 127/12/4/04-12)(HQ/10/DOC/00/167), total worker involve is 24 workers. All are fit to work accept 3 workers (Azlan Ambo, Damrah Beda dan Hasan Muhamad) and JKKP 7 is available. HIRARC review dated 9 August 2018.</p> <p>The appoint person for OSH responsible is Manager Mill appointed by Vijaya A/L Manikam dated 24 Oct 2017.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
	<p>trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept and the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>OSH meeting have been conduct on quarterly and latest is on 18 Sept 2018. Previously conduct on 26 June 2018 and 5 March 2018 as per OSHA 1996.</p> <p>First aid training conducted dated on 24 October 2018 by En Mastodin Kiwi ( HA) however found the first aid in Store is share with workshop and operation with total 23 employee in one time is not follow as per FMA under Regulation 38(20) (i) 4<sup>th</sup> Scheduled.</p> <p>ERP training is on 18 Oct 2018 for Fire Fighting and Firedrill is 24 May 2018.</p>	
<b>Criterion 4.4.5:</b> Employment conditions			
<b>4.4.5.1</b>	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>Covered under Genting Plantations' Social Policy (Incorporating the Labour and Human Rights requirements), dated 22/6/2015, signed by Mr. Yong Chee Kong (President and Chief Operating Officer). Various methods of communication implemented by the estate to communicate the policy to its employees such as display on notice boards, briefing and training.</p>	Complied

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4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p><b>- Major compliance -</b></p>	<p>Based on interview with employees from different backgrounds, there is no evidence that the management engage in or support any discriminatory practices. The commitment to no discrimination is also stated in the company's social policy.</p>	Complied
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>Based on sampled workers (employment no.: E00084, E00126, E00246, 80000653, E00177, E00153, E00030, E00062, E00251, E00232) pay slips for May, July and October 2018, it was found that the employer has met the pay and conditions as per agreed in the employment contract agreement.</p>	Complied
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p><b>- Minor compliance -</b></p>	<p>The pay for employees of contractors was monitored by the management through obtaining the pay slips from the contractors for all their workers.</p>	Complied
4.4.5.5	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p>	<p>Employee data base is kept and maintained in the computer system (Lyntramax). All the required information by this standard was available in the data based.</p>	Complied

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	- Major compliance -		
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.  - Major compliance -	Employment contracts were available in language that understood by the workers. The contract has the details about the payments and employment conditions such as period of working, working hour, medical assistance, housing, holiday, annual leave, period of notice to terminate the contract, etc.	Complied
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.  - Major compliance -	Time recording system is using punch card and made transparent for both employers and employees. A few samples of punch cards record were verified against pay slips. It was found that the recordings were accurate.	Complied
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.  - Major compliance -	Working hours and breaks were found to be in line with the legal requirement. There are 2 working shifts i.e. 0700 to 1500 and 1500 to 2300 hour and a flexible half an hour break in between is given.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.  - Major compliance -	Based on sampled pay slips as mentioned in 4.4.5.3, it was found that the wages and overtime payment were in line with the employment contract.	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as	Other benefits such as performance bonus was provided by the employer and verifiable in the pay slips. The establishment of estate clinic also provides the medical care for the mill workers and	Complied

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	incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.  - <b>Minor compliance</b> -	their dependents. Education through HUMANA school is provided for foreign workers dependents.	
<b>4.4.5.11</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.  - <b>Major compliance</b> -	The workers quarters was found to be habitable and in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446). Treated potable water and electricity were provided to the housing for free of charge. Nonetheless, the maintenance of septic tanks at labour line-sites of all the visited estates can be further improved by having them visible. Some of the septic tanks were fully covered with soil and their locations were unable to be traced (OFI).	Complied
<b>4.4.5.12</b>	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.  - <b>Major compliance</b> -	Sexual Harassment Policy has been established dated 3/8/2009 and signed by the Chief Operating Officer. The awareness of this policy among the workers was made through displaying of the policy at notice boards and briefing by the field staff.	Complied
<b>4.4.5.13</b>	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.  - <b>Major compliance</b> -	There is no trade union members in the estate. Nonetheless, there is also no restriction for them to join any trade union. This is recognized by the employer through establishment of people Policy dated 3/8/2009.	Complied

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Criterion / Indicator		Assessment Findings	Compliance										
<b>4.4.5.14</b>	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.  - Major compliance -	Based on the records in the employees data base system, which has the information about date of birth and date join, there was no children and young person being employed.	Complied										
<b>Criterion 4.4.6: Training and competency</b>													
<b>4.4.6.1</b>	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.  - Major compliance -	Comprehensive Safety Related training was provided to the workers. The following Training reviewed:-  <table border="1" data-bbox="1010 831 1794 1179"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Scheduled waste train by Ronlie Ronney(CePSWaM/184918)</td> <td>27 June 2018</td> </tr> <tr> <td>AESP and AGT training</td> <td>10 July 2018</td> </tr> <tr> <td>Environment Pollution awareness training</td> <td>7 January 2018</td> </tr> <tr> <td>Safety awareness</td> <td>14 Feb 2018</td> </tr> </tbody> </table>	Training	Date	Scheduled waste train by Ronlie Ronney(CePSWaM/184918)	27 June 2018	AESP and AGT training	10 July 2018	Environment Pollution awareness training	7 January 2018	Safety awareness	14 Feb 2018	Complied
Training	Date												
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Safety awareness	14 Feb 2018												
<b>4.4.6.2</b>	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and	Training Needs and plan is available for Genting Tanjung POM dated 5 Jan 2018 its cover specific skill and competency required to all employees.	Complied										

Criterion / Indicator		Assessment Findings	Compliance
	competency required to all employees based on their job description. <b>- Major compliance -</b>		
<b>4.4.6.3</b>	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure. <b>- Minor compliance -</b>	Training Needs and plan is available for Genting Tanjung POM dated 5 Jan 2018, this continuous training programme is planned and implemented to ensure that all employees are well trained in their job function and responsibility. The evaluation also have been conduct sampling on AESP and AGT training dated assessment is on 10 July 2018 for training dated 10 January 2018.	Complied
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
<b>4.5.1.1</b>	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. <b>- Major compliance -</b>	Environmental Policy is available dated 5 Oct 2009 approved by Yong Chee Kong. EMP is available dated 30 Oct 2018, this EMP is include to prevent of air pollution, water pollution, Noise Pollution, waste management, water usage and others area.  For Implementation sampling on Noise pollution, Boundary noise monitoring have been conduct on 29 January 2015 under record EC/0115/5556 by DAB OH Sdn Bhd.  The latest online monitoring protocol was used for reporting to DOE via eSWiS (schedule waste), CEMS for smoke emission 4 Nov 2018 and OER @ Online Environmental Reporting (1 July until 30 Sept 2018) for POME results and in line with mil's compliance schedule	Complied

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		<p>requirements. New Guided SelfRegulation was introduced by DOE to ensure all operator self-assessed the compliance status on environmental related issues. The approach is based on 7 Environmental Monitoring Tools (EMT) and implemented since June 2016.</p> <p>New establishment of EPMC @ Environmental Performance Monitoring Committee (operation level – mill) and ERCMC @ Environmental Regulatory Compliance Monitoring Committee (HQ level) shows the commitment towards continuous compliance. EPMC meeting latest dated 18 Sept 2018, the previous meeting is on 26 June 2018. The frequency is quarterly per year.</p> <p>No ERCMC/MRCM meeting have been conduct for Genting Tanjung POM 15 December 2017.</p>	
<b>4.5.1.2</b>	<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><b>- Major compliance -</b></p>	<p>The aspect impact for Genting Tanjung POM already review dated on 30 June 2018 (Doc No: SP-MGR-02-F01-0) no new activity and machine in Genting Tanjung POM.</p>	Complied
<b>4.5.1.3</b>	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>For water pollution prevention, the mill install of another pipe at underflow VST to prevent the overflow of water in chamber. This installation is on 1 Jan 2018. Recorded in Continuous Improvement Form (CIF).</p>	Complied



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4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - <b>Minor compliance</b> -	Continual improvement plan is available for Genting Tanjung POM covered under doc PM-MGR-08-F02-0. The plan such as to raise awareness about the environment pollution to the mill dated 1 Jan 2018.	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. - <b>Major compliance</b> -	Training for environment is available in ESH training file. Sampling of training, latest training is on 27 June 2018 for Scheduled waste train by Ronlie Ronney (CePSWaM/184918).	Complied
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - <b>Major compliance</b> -	EPMC meeting latest dated 18 Sept 2018, the previous meeting is on 26 June 2018. The frequency is quarterly per year. The EPM committee is including employee and employer dated latest 12 Nov 2018.	Complied
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>			
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within 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 - <b>Major compliance</b> -	The Non- Renewable energy is closely monitored under Diesel Consumption monitoring, latest is on Oct 2018 with consumption 16424.00 Liter or 0.48 Diesel/ffb. The Plan or target for GTPOM is reduce 3% for Diesel consumption.	Complied

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Criterion / Indicator		Assessment Findings	Compliance						
4.5.2.2	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p><b>- Major compliance -</b></p>	<p>The oil palm premises already estimate the direct usage of non-renewable energy for their operations such as fossil fuel as Per below:-</p> <table border="1"> <thead> <tr> <th>Financial Year</th> <th>FY 2018</th> <th>Fy 2019</th> </tr> </thead> <tbody> <tr> <td>Remarks</td> <td>Target: RM 324389.82 Todate Until Oct 2018:192,473</td> <td>Target:305,674 .6</td> </tr> </tbody> </table> <p>This available under budget file.</p>	Financial Year	FY 2018	Fy 2019	Remarks	Target: RM 324389.82 Todate Until Oct 2018:192,473	Target:305,674 .6	Complied
Financial Year	FY 2018	Fy 2019							
Remarks	Target: RM 324389.82 Todate Until Oct 2018:192,473	Target:305,674 .6							
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p><b>- Minor compliance -</b></p>	<p>The plan to improve the efficiency of fossil fuel usage was Established and approved by Mill Manager.</p> <ol style="list-style-type: none"> <li>To reduce diesel consumption by 2% for the year 2018.</li> <li>To increase 1% consumption of fibres for 2018.</li> </ol> <p>The plan was monitored by Mill Engineer on monthly basis.</p>	Complied						
<b>Criterion 4.5.3: Waste management and disposal</b>									
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p><b>- Major compliance -</b></p>	<p>The waste product and Source of pollution already identified dated 1 Oct 2018, GTPOM identified 3 type of waste( Scheduled waste, Domestic waste and recycle waste).</p>	Complied						
4.5.3.2	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p>	<p>The waste management plan for GTPOM dated 1 Oct 2018 is include monitoring such as inventory of SW, waste segregation, and etc.</p>	Complied						

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Criterion / Indicator		Assessment Findings	Compliance
	a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. <b>- Major compliance -</b>		
<b>4.5.3.3</b>	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 <b>- Major compliance -</b>	The inventory For SW 408 is not available refer 4.3.1.1, For SW 305 latest record have 1.2 MT in store and latest disposal 18 May 2018 with total 1.073 MT at Lagenda Bumimas Sdn Bhd ( License 003440 valid until 30 April 2019. Under license JPBT/KPKBT/12/003440 the Lagenda Bumimas Sdn Bhd is approve by DOE to disposal SW 305.	Complied
<b>4.5.3.4</b>	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. <b>- Minor compliance -</b>	Domestic waste for GTPOM is handle by Genting Tanjung estate. The Scheduled is available	Complied
<b>Criterion 4.5.4:</b> Reduction of pollution and emission			
<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	For assessment for greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent is been assess on 2018. The total emission that been generate is 5.79 tCO <sub>2</sub> e/t product for CPO and PK.	Complied

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<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented.  - <b>Major compliance</b> -	Pollution Prevention plan is available in GTPOM dated 27 Oct 2018, this action plan have identified in each activity such as at FFB receiving, processing, clarifying, domestic and scheduled waste and etc. For minimize GHG emission action plan also have been reviewed dated 31 October 2018 by management and verified during audit.	Complied
<b>4.5.4.3</b>	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.  - <b>Major compliance</b> -	As per OER(online environmental report) the POME discharge limits (BOD 20) land application and method should be in accordance with the respective state and national policies and regulations.	Complied
<b>Criterion 4.5.5: Natural water resources</b>			
<b>4.5.5.1</b>	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: a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage,	From water sampling report for Sungai Tenegang under ref GTOM/LAB/01/09 found the result of BOD and COD is according to Jadual Pematuhan for Genting Tanjung Mill dated 26 Sept 2018 analysis by KDC lab of KL-Kepong (Sabah) Sdn Bhd. The monitoring for Sg Tenegang is conduct 6 monthly once as per SMPM (SMP-GPB-15 dated 12 November 2014)	Complied

Criterion / Indicator		Assessment Findings	Compliance														
	collection of rainwater, etc.). - Major compliance -																
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 -	Not Applicable. GTPOM is apply land application as per Jadual Pematuhan.	Complied														
<b>4.6 Principle 6: Best Practices</b>																	
<b>Criterion 4.6.1: Mill Management</b>																	
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Standard Operating Manual dated 3 January 2016, this Operating manual cover from Reception (SOM-PRD-02) until Automation Monitoring system (SOM-MNT-22).	Complied														
4.6.1.2	All palm oil mills shall implement best practices.. - Major compliance -	Sampling for Palm Kernal Shell Stock monitoring as per SOM-MGR-21 dated 25 Jan 2016, latest record on 19 Nov 2018 as per detail below:- <table border="1" data-bbox="1012 1072 1749 1321"> <thead> <tr> <th>Quantity</th> <th></th> <th>Oil Storage tank</th> <th>Capacity (MT)</th> <th>Percentage Usage</th> </tr> </thead> <tbody> <tr> <td>FFB received</td> <td>9079.62 mt</td> <td rowspan="3">7</td> <td rowspan="3">10200</td> <td rowspan="3">16.52%</td> </tr> <tr> <td>CPO output</td> <td>1578.88 mt</td> </tr> <tr> <td>CPO stock</td> <td>1685.18 mt</td> </tr> </tbody> </table>	Quantity		Oil Storage tank	Capacity (MT)	Percentage Usage	FFB received	9079.62 mt	7	10200	16.52%	CPO output	1578.88 mt	CPO stock	1685.18 mt	Complied
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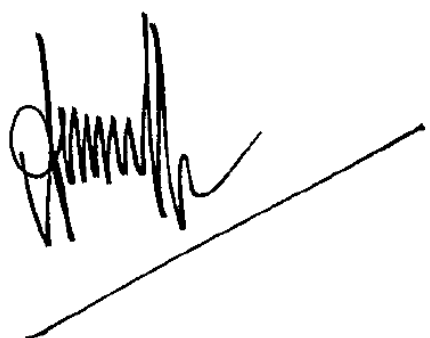
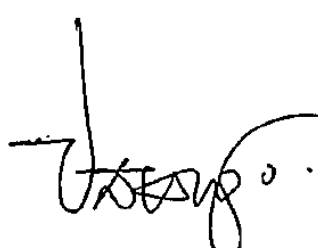
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Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 4.6.2:</b> Economic and financial viability plan			
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. <b>- Major compliance -</b>	POM has predicted for FY2018 to FY2020 is evident in Genting Tanjung Oil Mill projection for year 2018 to year 2020. The projection covers cop intake from own estate, from outside purchase (smallholders), total intake, processing cost and extraction rate (OER & KER).Budget for GTPOM is available for 5 years and have a record.	Complied
<b>Criterion 4.6.3:</b> Transparent and fair price dealing			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. <b>- Major compliance -</b>	Pricing mechanisms for the products and other services were clearly written in the contract and purchase order. For CPO and PK transporter, fees of services is mentioned under Third Schedule under the contract agreement. For supplier, specific terms and conditions are mentioned under notes and conditions on the transport and payment documentation. For FFB supplier, price will be updated based on monthly average price of the previous month. Payment will refer end month average closing price for example October 2017. Payments are processed and made by HQ through system named Lintramex This is made upon job verification by the mill personnel.	Complied
<b>4.6.3.2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	Payments to the contractors were found to be fair, legal, transparent and timely manner in accordance to the established contract agreements. So far there has been no complaints with regards to payments. Further confirmation was also obtained during stakeholders consultation.	Complied
<b>Criterion 4.6.4:</b> Contractor			

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.6.4.1</b>	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. <b>- Major compliance -</b>	Genting Tanjung POM had informed its contractors regarding the need to adhere the MSPO requirements. Awareness briefing was done the stakeholders including contractors on the MSPO requirements.	Complied
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	The contractors, for e.g. CPO & PK transpoters (Landasan Kembar Sdn Bhd and Chong Shu Min Trading) have signed the contract agreement where the requirements of MSPO to be adhered stipulated in Clause (ix) of the agreement, dated 1/1/2018.	Complied
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. <b>- Minor compliance -</b>	The requirement of accepting MSPO accredited auditors to audit against the contractors are being stated in the formal letter attachment to the contractors.	Complied

**Section 4: Assessment Conclusion and Recommendation**

<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>	
Based on the findings during the assessment Genting Tanjung Palm Oil Mill and supply base complies with the <b>MS 2530-3:2013</b> and <b>MS 2530-4:2013</b> . It is recommended that the certification of Genting Tanjung Palm Oil Mill and supply base is approved and/or continued.	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<b>Name:</b> Arunan Kandasamy	<b>Name:</b> Valence Shem
<b>Company name:</b> Genting Plantations Berhad	<b>Company name:</b> BSI Services Malaysia Sdn Bhd
<b>Title:</b> SVP-Plantation (Malaysia)	<b>Title:</b> Lead Auditor
<b>Signature:</b>  xAK	<b>Signature:</b> 
<b>Date:</b> 06/05/2019	<b>Date:</b> 30/4/2019



**Appendix A: Assessment Plan**

Date	Time	Subjects	VSH	MNM
Wednesday 21/11/2018	0830-0900	Opening meeting: <ul style="list-style-type: none"> <li>Opening presentation by audit team leader</li> <li>Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation)</li> </ul>	✓	✓
	0900-1200	<b>Genting Tanjung POM</b> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	✓	✓
	1000-1200	Stakeholder consultations for <b>both mill and estates</b> which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.	✓	
	1200-1300	Lunch break		
	1300-1630	<b>Genting Tanjung POM</b> Document Review P1 – P6 (MSPO Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓
	1630-1700	Interim closing briefing	✓	✓
Thursday 22/11/2018	0830-1200	<b>Genting Landworthy Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, worker housing, clinic, Landfill, , etc.	✓	✓
	1200-1300	Lunch break		
	1300-1630	<b>Genting Landworthy Estate</b> Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓
	1630-1700	Interim closing briefing	✓	✓
Friday 23/11/2018	0830-1200	<b>Genting Tanjung Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, worker housing, clinic, Landfill, , etc.	✓	✓
	1200-1300	Lunch break		
	1300-1630	<b>Genting Tanjung Estate</b> Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓

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	1630-1700	Interim closing briefing	✓	✓
Saturday 24/11/2018	0830-1300	<b>Genting Tenegang Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, worker housing, clinic, Landfill, , etc.	✓	✓
	1200-1300	Lunch break		
	1300-1600	<b>Genting Tenegang Estate</b> Document review P1 – P7 (MSP0 Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓
	1600-1630	Verify any outstanding issues & preparation for closing meeting	✓	✓
	1630-1730	Closing meeting	✓	✓

**Appendix B: List of Stakeholders Contacted**

**Internal Stakeholders**

Workers' Representative Women's Representative Harvesters Mill Operators Sprayers General workers Hospital Assistant
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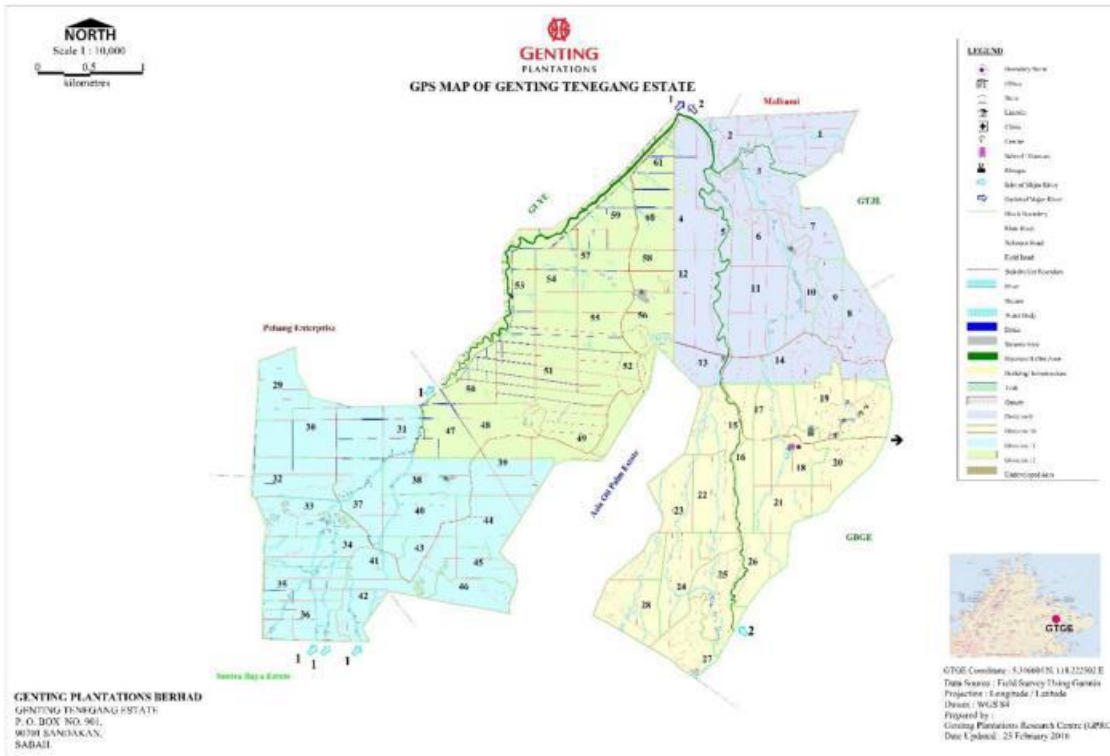
**External Stakeholders**

<b>Government Departments</b>	<b>NGOs and others</b>	<b>Local Communities</b>
Nil	Nil	Neighbouring estates (Anchor, Malbumi and Yu Kuang)

**Appendix C: Smallholder Member Details**

Not applicable.

**Appendix D : Location Map of Genting Tanjung Palm Oil Mill and Supply base**



**Appendix E: List of Abbreviations Used**

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