

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

<b>FGV Holdings Berhad</b>
Head Office: Level 20 West, Wisma FGV Jalan Raja Laut, 50350 Kuala Lumpur, Malaysia
Certification Unit: FGV Palm Industries Sdn Bhd (Keratong 3 Palm Oil Mill) and FGV Plantations (Malaysia) Sdn Bhd (Keratong 11 Estate)  Location of Certification Unit: Kilang Sawit Keratong 3 26900 Muadzam Shah Pahang, Malaysia

**Report prepared by:**  
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**Report Number: 9673528**

**Assessment Conducted by:**

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## Section 1: Executive Summary

### 1.1 Organizational Information and Contact Person

Company Name	FGV Holdings Berhad		
Mill/Estate	MPOB License No.	Expiry Date	
FGVPI Keratong 3 Palm Oil Mill	500194604000	30/06/2020	
FGVPM Keratong 11 Estate	558962002000	31/05/2020	
Address	Level 20 West, Wisma FGV, Jalan Raja Laut, 50350 Kuala Lumpur, Malaysia		
Certification Unit	Kilang Sawit Keratong 3, 26900 Muadzam Shah, Pahang, Malaysia		
Contact Person Name	Ameer Izyanif Bin Hamzah		
Website	<a href="http://www.fgvholdings.com/">http://www.fgvholdings.com/</a>	E-mail	<a href="mailto:ameer.h@fgvhodings.com">ameer.h@fgvhodings.com</a>
Telephone	+603 2859 1644	Facsimile	+603 2698 7816

### 1.2 Certification Information

Certificate Number	MSPO 693214 (Mill); MSPO 693216 (Estate)		
Issue Date	6/12/2018	Expiry date	5/12/2023
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Standard	MS 2530-3:2013 (MSPO Part 3) & MS 2530-4:2013 (MSPO Part 4)		
Stage 1 Date	22/5/2018		
Stage 2 / Initial Assessment Visit Date (IAV)	20–21/9/2018		
Continuous Assessment Visit Date (CAV) 1	3-4/12/2019		
Continuous Assessment Visit Date (CAV) 2	N/A		
Continuous Assessment Visit Date (CAV) 3	N/A		
Continuous Assessment Visit Date (CAV) 4	N/A		

### Other Certifications

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 693213	RSPO P&C MY-NI 2019; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E: Mass Balance)	BSI Services Malaysia Sdn. Bhd.	24/03/2024

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<b>1.3 Location of Certification Unit</b>			
Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Longitude	Latitude
FGV Palm Industries Kilang Sawit Keratong 3	Kilang Sawit Keratong 3, 26900 Muadzam Shah, Pahang, Malaysia	102.93444	2.92333
FGVPM Keratong 11 Estate	Ladang Keratong 11, 26700 Muadzam Shah, Pahang, Malaysia	103.01850	2.88561

<b>1.4 Certified Area</b>					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
FGVPM Keratong 11 Estate	984.24	-	212.16	1,196.40	82.27
<b>TOTAL</b>	984.24	-	212.16	1,196.40	82.27

<b>1.5 Plantings &amp; Cycle</b>							
Estate	Age (Years)					Mature (ha)	Immature (ha)
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
FGVPM Keratong 11 Estate	156.29	130.99	129.50	567.46	-	827.95	156.29
<b>Total (ha)</b>	156.29	130.99	129.50	567.46	-	827.95	156.29

<b>1.6 Certified Tonnage of FFB</b>			
Estate	Tonnage / year		
	Estimated (Jan – Dec 2019)	Actual (Dec 2018 – Nov 2019)	Forecast (Jan – Dec 2020)
FGVPM Keratong 11 Estate	17,566.23	17,575.93	17,400.00
<b>Total</b>	17,566.23	17,575.93	17,400.00

<b>1.7 Uncertified Tonnage of FFB</b>			
Estate	Tonnage / year		
	Estimated (Jan – Dec 2019)	Actual (Dec 2018 – Nov 2019)	Forecast (Jan – Dec 2020)
Felda & FTP	57,500.00	56,902.01	57,500.00
Smallholder & Supplier	26,730.00	24,580.04	26,730.00
<b>Total</b>	84,230.00	81,482.05	84,230.00

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<b>1.8 Certified Tonnage</b>			
<b>Mill Capacity: 40 MT/hr</b>	<b>Estimated (Jan – Dec 2019)</b>	<b>Actual (Jan – Dec 2019)</b>	<b>Forecast (Jan – Dec 2020)</b>
	<b>FFB</b>	<b>FFB</b>	<b>FFB</b>
	17,566.23	17,575.93	17,400.00
	<b>CPO (OER: 20.89%)</b>	<b>CPO (OER: 20.46%)</b>	<b>CPO (OER: 20.50%)</b>
	3,668.74	3,596.04	3,567.00
	<b>PK (KER: 5.11%)</b>	<b>PK (KER: 5.03%)</b>	<b>PK (KER: 5.00%)</b>
	898.13	884.07	870.00

<b>1.9 Actual Sold Volume (CPO)</b>					
<b>CPO (MT)</b>	<b>MSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSPO</b>		
3,500.00	-	-	-	3,500.00	3,500.00

\*As per sales contract volume

<b>1.10 Actual Sold Volume (PK)</b>					
<b>PK (MT)</b>	<b>MSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSPO</b>		
800.00	-	-	-	800.00	800.00

\*As per sales contract volume

## Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 190 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 3-4/12/2019. The audit programme is included as Appendix A. The approach to the audit was to treat the FGVPI Keratong 3 Oil Mill and its supply base FGVPM Keratong 11 Estate as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
FGVPI Keratong 3 Palm Oil Mill	✓	✓	✓	✓	✓
FGVPM Keratong 11 Estate	✓	✓	✓	✓	✓

**Tentative Date of Next Visit: December 1, 2020 - December 2, 2020**

**Total No. of Mandays: 4 mandays**

**2.1 BSI Assessment Team**

Team Member Name	Role	Qualifications
Hafriazhar Mohd. Mokhtar	Team Leader	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 9001, ISO 14001, ISO 45001 and ISO 50001 and has accumulated more than 1000 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands, Gabon, Nigeria and Pakistan. He also completed his MSPO Lead Assessor course since since March 2018 and involved in various assessments covering MSPO Part 2, MSPO Part 3 and MSPO Part 4 as well as MSPO SCCS certifications audit. During this assessment, he assessed on the aspects of land and legal issues, workers welfare, stakeholder consultation, social. She is fluent in Bahasa Malaysia and English languages.
Yusof Khairan Nizar	Team Member	He holds a Master of Science in OSH Management. More twenty years of experience in quality assurance in various industries i.e. manufacturing and service. Tutor and Certified Lead Assessor for OSHAS 18001. Associating in various local CB and conducted various audits in Malaysia & other countries for various Management Systems. During assessment, he covered the estate best practices, legal issues, social issues, workers consultation, stakeholder consultation, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.

**2.2 Accompanying Persons**

Nil

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### 2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment as following:

Date	Time	Subjects	HMM	YKN
Monday 2/12/2019	PM	Audit team travel to Segamat & Check-in @ Golden Lake Yayasan Hotel	✓	✓
Tuesday 3/12/2019	08:30 – 09:00	Opening Meeting (Keratong 3 Palm Oil Mill) <ul style="list-style-type: none"> <li>• Presentation by FGV Keratong 3</li> <li>• Presentation by BSI Lead Auditor - introduction of team member and assessment agenda</li> <li>• Confirmation of assessment scope and finalizing audit scope</li> </ul>	✓	✓
	09:00 – 12:30	<b>FGVPM Keratong 11 Estate</b> Estate assessment: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓
	10:30 – 12:30	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	✓	-
	12:30 – 13:30	Lunch break		
	13:30 – 16:30	<b>FGVPM Keratong 11 Estate</b> Document Review (MS2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices	✓	✓
	16:30 – 17:00	Interim closing meeting	✓	✓
Wednesday 4/12/2019	08:30- 12:30	<b>Keratong 3 Palm Oil Mill</b> Mill Assessment: Plant visit, FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	✓	✓
	12:30 – 13:30	Lunch break	✓	✓
	13:30 – 16:30	<b>Keratong 3 Palm Oil Mill</b> Document review (MS2530:2011 Part 4): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices, P7: Development of New Planting	✓	✓
	16:30 – 17:00	Interim closing meeting	✓	✓
Thursday 5/12/2019	AM	Audit team travel back to KL	✓	✓



### 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 Certification Assessment there were one (1) Major and one (1) Minor nonconformities and eight (8) Opportunity for Improvements (OFI) raised. The FGV Keratong 3 Palm Oil Mill & Estates Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. No Major Non-conformity has been raised.

Major Nonconformities:		
<b>Ref:</b> 1859638-201911-M1	<b>Area/Process:</b> MS2530-3:2013 & MS2530-4:2013 FGV Keratong 3 Palm Oil Mill & Supply Base	<b>Clause:</b> 4.4.4.2 (d) – Part 4
	<b>Issue Date:</b> 3/12/2019	<b>Due Date:</b> 1/3/2020
<b>Requirements:</b>	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).	
<b>Statement of Nonconformity:</b>	Sighted three employees exposed to high noise area not wearing ear plugs/muff and a welders and contractor employees performing hot work activities not wearing face shield.	
<b>Objective Evidence:</b>	Keratong 3 POM: During site visit sighted PPE provided by the employer not adequately used by employees exposed at high noise area as sighted 2 employees at boiler area, and overhead crane operator not wearing ear plugs and employee at workshop performing hot work activity (welding) and contractor employee (Tinta Bumi Enterprise) doing welding on cage not wearing face shield to protect face and eye from potential injury.	
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- Issue a warning letter or warning to the employees and contractors involved.</li> <li>- Appoint the responsible officer to check the compliance of the PPE application at the mill premises.</li> </ul>	
<b>Root cause analysis:</b>	There is no monitoring and enforcement of compliance with the use of PPE by workers and contractors in the workplace by the mill management.	

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Corrective Actions:	Conduct periodic inspections of compliance with the application of PPEs by officers and contractors in the field.
Assessment Conclusion:	<p>CAP has been accepted and evidence of CAP implementation was verified as following:</p> <ul style="list-style-type: none"> <li>- Issuance of warning letter to employees and contractors involved dated 15/12/2019</li> <li>- Letter of appointment of officer to check compliance of PPE use in mill</li> <li>- Record of work area inspections including PPE use by employees and contractors in mills dated Jan 2020</li> </ul> <p>It was confirmed that the CAP has been effective and no recurrence of issue. Hence, Major NC has been closed on 2/2/2020.</p>

**Minor Nonconformities:**

<b>Ref:</b> 1859638-201911-N1	<b>Area/Process:</b> MS2530-3:2013 & MS2530-4:2013 FGV Keratong 3 Palm Oil Mill & Supply Base	<b>Clause:</b> 4.5.3.5 - Part 3
	<b>Issue Date:</b> 3/12/2019	<b>Due Date:</b> 2/12/2020
Requirements:	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses	
Statement of Nonconformity:	Sighted during site visit at Landfill in Block 6, domestic waste not properly segregated between organic and inorganic waste and no recycling was practice as required from the 3R Programme 2019.	
Objective Evidence:	Domestic waste was disposed at landfill at Block 6 where found no segregation of domestic waste between organic and inorganic in the landfill sighted.	
Corrections:	<ul style="list-style-type: none"> <li>- Conduct awareness campaigns on the importance of recycling to staffs and estate's workers in line with sustainability procedures.</li> <li>- Separate inorganic waste and collected at a designated collection bin</li> <li>- Sell / dispose of waste that has been segregated to the recycling contractors</li> <li>- Reuse used trash. Examples: - landscaping, field activities.</li> </ul>	
Root cause analysis:	There are no monitoring of domestic waste handling and disposal by contractor	
Corrective Actions:	Appoint person in-charge for management to ensure domestic waste handling by contractor being monitored according to company requirements	
Assessment Conclusion:	CAP has been accepted and evidence of CAP effectiveness to be verified in the next assessment.	

**Opportunity For Improvement**

<b>Ref:</b> 1859638-201911-I1	<b>Area/Process:</b> MS 2530:2013 Part-4 FGVPI Keratong 3 Palm Oil Mill	<b>Clause:</b> 4.5.1.6
Objective Evidence:	The meeting to discuss environmental quality to be enhanced further considering more issues and more regularly conducted to establish better commitment on environment.	

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Opportunity For Improvement		
<b>Ref:</b> 1859638-201911-I2	<b>Area/Process:</b> MS 2530:2013 Part-4 FGVPI Keratong 3 Palm Oil Mill	<b>Clause:</b> 4.5.2.2
Objective Evidence:	The electricity consumption was recorded on daily basis. This need to be improved further to established summary of consumption on monthly basis for easy monitoring.	

Opportunity For Improvement		
<b>Ref:</b> 1859638-201911-I3	<b>Area/Process:</b> MS 2530:2013 Part-4 FGVPI Keratong 3 Palm Oil Mill	<b>Clause:</b> 4.5.3.3
Objective Evidence:	Generated contaminated waste to be controlled and managed at workshop that was kept in a clearly marked temporary bins for contaminated gloves, rags, empty spray/grease/oils containers/cans need to be improved further.	

Opportunity For Improvement		
<b>Ref:</b> 1859638-201911-I4	<b>Area/Process:</b> MS 2530:2013 Part-3 FGVPI Keratong 11 Estate	<b>Clause:</b> 4.4.4.2
Objective Evidence:	Generated contaminated waste to be controlled and managed at workshop that was kept in a clearly marked temporary bins for contaminated gloves, rags, empty spray/grease/oils containers/cans need to be improved further.	

Opportunity For Improvement		
<b>Ref:</b> 1859638-201911-I5	<b>Area/Process:</b> MS 2530:2013 Part-3 FGVPI Keratong 11 Estate	<b>Clause:</b> 4.5.1.6
Objective Evidence:	Regular meeting on environmental quality was conducted and discussed as evidence to support this from Minute of meeting conducted for Safety and Health Committee dated 26/02/19, 14/05/19, 28/08/19, 18/11/19. The environmental quality issues to be further enhanced and mentioned in the future meeting.	

Opportunity For Improvement		
<b>Ref:</b> 1859638-201911-I6	<b>Area/Process:</b> MS 2530:2013 Part-3 FGVPI Keratong 11 Estate	<b>Clause:</b> 4.5.3.3
Objective Evidence:	The labelling of SW 409 and SW 306 in Scheduled Waste Store to be improved and filled up with information required.	

Opportunity For Improvement		
<b>Ref:</b> 1859638-201911-I7	<b>Area/Process:</b> MS 2530:2013 Part-3 FGVPI Keratong 11 Estate	<b>Clause:</b> 4.3.1.4
Objective Evidence:	Documentations related to monitoring of legal compliance such as reference of DOE Compliance Schedule POME Final Discharge Parameters can be included in the legal register.	

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<b>Opportunity For Improvement</b>		
<b>Ref:</b> 1859638-201911-I8	<b>Area/Process:</b> MS 2530:2013 Part-3 FGVPI Keratong 11 Estate	<b>Clause:</b> 4.4.2.2
Objective Evidence:	Status of complaints and resolution recorded in the Complaint Book could be completely filled-in to reflect the actual status either resolved or not.	

<b>Noteworthy Positive Comments</b>	
	n/a

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

<b>Major Nonconformities:</b>		
<b>Ref:</b> 1682567-201804-M1	<b>Area/Process:</b> MS2530-3:2013 & MS2530-4:2013 FGV Keratong 3 Palm Oil Mill & Supply Base	<b>Clause:</b> 4.3.1.1 (Part 3)
	<b>Issue Date:</b> 21/9/2018	<b>Due Date:</b> 20/12/2018
Requirements:	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.	
Statement of Nonconformity:	Some of the legal requirement is not adequately implemented.	
Objective Evidence:	<p>1. In Keratong 11 Estate, sighted the diesel permit (series no: C026546) was expired on 11 September 2018. The application has been made after the expiry date and yet to have inspection from Jabatan Bomba and approval from KPDNKK.</p> <p>2. Keratong 11 estate already sent 20 workers for medical surveillance however some worker Md Iman Miah, Mohammad Amirul Islam, Islam Mohamad Kamrul and Ahmad Halim are not included in the medical surveillance programmed or baseline assessment as per CHRA recommendation.</p>	
Corrections:	<ul style="list-style-type: none"> <li>- The appointment letter of the officer which is responsible for the monitoring of medical surveillance</li> <li>- Letter of application on sprayer workers to medical surveillance.</li> <li>- Medical surveillance report follow-up record status of medical surveillance application</li> <li>- Minutes of OSHA meeting with SHO Region to monitor this issue</li> <li>- Borang mekanisma pematuhan Undang-undang</li> </ul>	
Root cause analysis:	Management only sent old sprayer workers to Medical Surveillance compared to new sprayer workers due to limited allocation in budget for sending all sprayer to Medical surveillance.	
Corrective Actions:	Estate management should send all sprayer workers to medical surveillance especially samples that have been issued. Appointed PIC will monitor the expiry date through Sistem Mekanisma Pematuhan Undang-undang Form.	
Assessment Conclusion:	Audit team have reviewed the evidence summited and of the view that the major NC is satisfactorily closed. Continuous implementation of corrective action taken will	

	<p>be further verified in the next assessment visit. The major NC was closed out on 19.11.2018.</p>
Verification Statement:	<p>Site visit during ASA 1 found the following:</p> <p>FGVPM has established SOP on track changes, monitoring, implementation and compliances of legal and other requirement. Refer doc. no ML-1A/L2-Pr6 (0) dated 1/6/2016.</p> <p>Plantation and Sustainability Department and Manager for respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement. To monitor the status of legal compliance, the management has appointed the Supply Clerk, Norfadzilah Binti Ismail, as per letter ref. # (01) RSPO/P5; Date: 10/1/2019.</p> <p>All legal requirement was documented in Register of Legal and Other Requirements (Ref doc no FPI/L4/QOSHE-2.1 Pind. 0) and List of compliance license/permit/legal requirement.</p> <p>Compliance to each applicable law and regulation is monitored by the operating units. Sighted the sampled evidence of compliancy to the regulation as follows:</p> <ul style="list-style-type: none"> <li>- MPOB license # 558962002000 – Ladang Felde Keratong Sebelas (Sales &amp; Handling: FFB #); Validity period: 1/3/2019 – 29/2/2020; Estate area: 1,178.31 ha</li> <li>- Schedule Control Goods Permit; Serial # P(C000017-RPN); Ref. # PHG/RPN/045/98 SK(D); Goods Description: Diesel (Unsubsidized); Volume: 10,920 liters; Validity period: 28/2/2019 – 27/2/2020</li> <li>- Jabatan Tenaga Kerja Semenanjung Malaysia Permit Potongan Daripada Gaji Pekerja (Seksyen 24 Akta Kerja 1955); For "<i>pembayaran yuran bulanan Badan Kebajikan Petugas Felde Palm Industries</i>"; Serial # PP3/34/1013; Effective date: 16/1/2005; Requires following:             <ul style="list-style-type: none"> <li>- Total deduction &lt;50% or 75% if involved housing loan</li> <li>- Letter of agreement signed by workers shall be kept and shown to Labour Officer anytime requested</li> <li>- New application shall be made if particulars of deduction changes from approved by permit (Ref. Certificate of Incorporation on Change of Name of Company: Felde Palm Industries Sdn. Bhd. to FGV Palm Industries Sdn. Bhd.; Date of original incorporation: 14/9/1995; Date of name change: 11/12/2018</li> <li>- Employer shall provide particulars relevant to permit upon request by Labour Office from time to time</li> <li>- Permit shall be displayed on strategic location easy to be viewed by workers</li> </ul> </li> </ul> <p>It was confirmed that the CAP has been effective and no recurrence of issue. Hence, Major NC remained closed.</p>

<b>Major Nonconformities:</b>		
<b>Ref:</b> 1682567-201804-M2	<b>Area/Process:</b> MS2530-3:2013 & MS2530-4:2013 FGV Keratong 3 Palm Oil Mill & Supply Base	<b>Clause:</b> 4.3.1.1 (Part 4)
	<b>Issue Date:</b> 21/9/2018	<b>Due Date:</b> 20/12/2018

Requirements:	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.
Statement of Nonconformity:	Some of the legal requirement is not adequately implemented.
Objective Evidence:	In Keratong 03 POM, sighted the diesel permit (series no: C003477) was expired on 19 January 2018. The application has been made after the expiry date which is 29 January 2018 and yet to get approval from KPDKK.
Corrections:	<ul style="list-style-type: none"> <li>- The appointment letter of the officer which is responsible for monitoring the acts</li> <li>- Application for renewal of diesel permit</li> <li>- New diesel permit</li> <li>- Evidences on follow-up status of diesel permit renewal application</li> <li>- Minutes of OSHA meeting with SHO Region to monitor this issue</li> <li>- Borang mekanisma pematuhan Undang-undang</li> </ul>
Root cause analysis:	The management overlooked due to change of new financial clerk as a responsible officer appointing this issue
Corrective Actions:	Estate management needs to provide a new diesel permit. Appointed PIC will monitor the expiry date through Sistem Mekanisma Pematuhan Undang-undang Form.
Assessment Conclusion:	Audit team have reviewed the evidence submitted and of the view that the major NC is satisfactorily closed. Continuous implementation of corrective action taken will be further verified in the next assessment visit. The major NC was closed out on 19.11.2018.
Verification Statement:	<p>Site visit during ASA 1 found the following:</p> <p>FGVPISB has established SOP on track changes, monitoring, implementation and compliances of legal and other requirement. Refer doc. no ML-1A/L2-Pr6 (0) dated 1/6/2016.</p> <p>Plantation and Sustainability Department and Manager and Asst. Manager for respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement. To monitor the status of legal compliance, the management has appointed the Executive Assistant, Zaini Binti Rahimi, as per letter ref. # (07)4028/KTG3/840A/RSPO; Date: 1/11/2019.</p> <p>All legal requirement was documented in Register of Legal and Other Requirements (Ref doc no FPI/L4/QOSHE-2.1 Pind. 0) and List of compliance license/permit/legal requirement.</p> <p>Compliance to each applicable law and regulation is monitored by the operating units. Sighted the sampled evidence of compliancy to the regulation as follows:</p> <ul style="list-style-type: none"> <li>- MPOB license # 500194604000 – FGV Palm Industries Sdn. Bhd. Kilang Sawit Keratong 3 (Sales &amp; Handling: FFB, PK, CPO, SPO #; Purchase &amp; Handling: FFB, PK, CPO #; Storage: PK, CPO, SPO #; Milling: FFB#); Validity period: 1/4/2019 – 31/3/2020; Max processing capacity: 259,200 mt FB/year</li> <li>- MPOB license # 618371015000 – FGV Trading Sdn. Bhd. (Sales &amp; Handling: FFB #; Purchase &amp; Handling: FFB; Validity period: 5/7/2019 – 30/6/2020</li> <li>- Jabatan Tenaga Kerja Semenanjung Malaysia Permit Potongan Daripada Gaji Pekerja (Seksyen 24 Akta Kerja 1955); For "pembayaran yuran bulanan Badan</li> </ul>

	<p><i>Kebajikan Petugas Felda Palm Industries</i>; Serial # PP3/34/1013; Effective date: 16/1/2005; Requires following:</p> <ul style="list-style-type: none"> <li>- Total deduction &lt;50% or 75% if involved housing loan</li> <li>- Letter of agreement signed by workers shall be kept and shown to Labour Officer anytime requested</li> <li>- New application shall be made if particulars of deduction changes from approved by permit (Ref. Certificate of Incorporation on Change of Name of Company: Felda Palm Industries Sdn. Bhd. to FGV Palm Industries Sdn. Bhd.; Date of original incorporation: 14/9/1995; Date of name change: 11/12/2018</li> <li>- Employer shall provide particulars relevant to permit upon request by Labour Office from time to time</li> <li>- Permit shall be displayed on strategic location easy to be viewed by workers</li> </ul> <p>It was confirmed that the CAP has been effective and no recurrence of issue. Hence, Major NC remained closed.</p>
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Minor Nonconformities:		
<b>Ref:</b> 1682567-201804-N1	<b>Area/Process:</b> MS2530-3:2013 & MS2530-4:2013 FGV Keratong 3 Palm Oil Mill & Supply Base	<b>Clause:</b> 4.4.6.3 (Part-4)
	<b>Issue Date:</b> 21/9/2018	<b>Due Date:</b> 20/9/2019
Requirements:	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.	
Statement of Nonconformity:	The continuous training is not implemented.	
Objective Evidence:	During site visit and interview with Store attendant and Laboratory staff in Keratong 3 POM, it was found that there were no Spill kit, emergency response plan and emergency contact number available in Store for lubricant and laboratory.	
Corrections:	<ul style="list-style-type: none"> <li>- Records of awareness training for store operators and laboratories on emergency response plans and spill kits</li> <li>- Analytical efficiency after training</li> <li>- Minutes of management meetings to monitor the effectiveness of the training.</li> <li>- Plan on Awareness training for lab operator on emergency action plans and spill kits</li> </ul>	
Root cause analysis:	Management does not evaluate efficiency after training for staffs	
Corrective Actions:	Mill management needs to monitor the understanding of personnel on emergency response plans as well as the preparation of spill kits at critical station such as in lubricant store and laboratories. Monitoring by Mill management through OSHA meetings and periodic reviews by Sustainable Audit.	
Assessment Conclusion:	The proposed correction and corrective action plan are acceptable. The effectiveness of implementation will be verified in the next assessment visit.	
Verification Statement:	Site visit during ASA 1 found the following: Evidence of training for Keratong 03 Palm Oil Mill as verified in 2019:	

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	<ul style="list-style-type: none"> <li>• Safety Briefing for STR Station and Bobcat was conducted on 17/08/19 attended by 11 employees.</li> <li>• Safety Work and LOTO Operation was conducted on 12/07/19 attended by 12 employees.</li> <li>• HCV (Biodiversity) Training was conducted on 10/05/19 attended by 83 employees.</li> <li>• Contractor Safety Training was conducted on 21/03/19 an attended by 9 contractor’s representative.</li> <li>• Chemical Handling Training was conducted on 26/02/19 and attended by 7 employees.</li> </ul> <p>VORSEP Training (For Boiler Operator) was conducted on 18/01/19 and attended by 8 employees.</p> <p>It was confirmed that the CAP has been effective and no recurrence of issue. Hence, Minor NC has been closed on 3/12/2019.</p>
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**3.4 Summary of the Nonconformities and Status**

CAR Ref.	CLASS	ISSUED	STATUS
1682567-201804-M1	Major	21/9/2018	Closed on 20/12/2018
1682567-201804-M2	Major	21/9/2018	Closed on 20/12/2018
1682567-201804-N1	Minor	21/9/2018	Closed on 3/12/2019
1859638-201911-M1	Major	3/12/2019	Closed on 2/2/2020
1859638-201911-N1	Minor	3/12/2019	Open

**3.5 Issues Raised by Stakeholders**



IS #	Description
<b>1</b>	<b>Feedbacks:</b> <u>Keratong Industrial Supply (Supplier)</u> Has long business relationship with Felda and now FGV for more than 10 years. The pricing is ok and payment received is within the timeline.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No further issue.
<b>2</b>	<b>Feedbacks:</b> <u>Far East Holding Berhad (Neighbour: DSK Estate)</u> Has good relationship with FGV whom allowing the road access and tapping of public water line. The boundary from FGV estates are clearly demarcated. No land dispute issue.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No further issue.
<b>3</b>	<b>Feedbacks:</b> <u>Peneroka Felda Keratong 7</u> As the FELDA settler who sent FFB to Keratong POM, the FFB price was displayed and inform to them. No issue in sending FFB and receiving the weighbridge ticket with complete information.
	<b>Management Responses:</b> Noted on the information.



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	<b>Audit Team Findings:</b> No further issue.
4	<b>Feedbacks:</b> <u>SMART Clerk (Petrol Station)</u> SMART is giving petrol and diesel subsidy rate to FELDA settlers. Previously, FGV has bought the petrol & diesel from SMART too before the cash term applied.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No further issue.
5	<b>Feedbacks:</b> <u>Gender Committee Representatives</u> No sexual harassment cases reported so far and no domestic violence cases too. Meeting and activities were conducted actively year round with participation by all female employees together with wives of male staffs. Has collaboration with Felda's Gabungan Persatuan Wanita (GPW) in most activities.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No further issue.
6	<b>Feedbacks:</b> <u>Keratong 3 POM Canteen Shopkeeper</u> The canteen operated from morning until evening. The water used for cook and drinks are come from clean water supply from house which they bring themselves.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No further issue.

**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 FGV Keratong 3 Palm Oil Mill and Supply Base Certification Unit complies with the <b>MS 2530-3:2013 and MS 2530-4:2013</b> . It is recommended that the certification of FGV Keratong 3 Palm Oil Mill and Supply Base Certification Unit is approved and/or continued.	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<b>Name:</b> AMEER IZYANIF	<b>Name:</b> Hafriazhar Mohd. Mokhtar
<b>Company name:</b> FGVHB	<b>Company name:</b> BSI Services Malaysia Sdn. Bhd.
<b>Title:</b> HEAD, SUSTAINABILITY COMPLIANCE & CERTIFICATION	<b>Title:</b> Lead Auditor
<b>Signature:</b>  Date: 28.04.2020	<b>Signature:</b>  Date: 24/4/2020

**Appendix A: Summary of the findings by Principles and Criteria**

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>	FGV Group Sustainability Policy covers MSPO commitment (clause 5.0) FGV/SED/POL/001(rev 3) dated 29/05/2019 and approved by Datuk Wira Azhar Abdul Wahid.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. <b>- Major compliance -</b>	Policy states commitment to economic improvement, environmental sustainability and social and improve milling productivity and profitability.	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 was planned as per Internal Audit Procedure; Doc. # ML-1A/L2-Pr11(0); Rev. 0; Effective date: 1/6/2016 and conducted on 19/8/2019 by a team of internal auditors personnel from FGV HQ.	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	Established as FGV Internal Audit Procedure; Doc. # ML-1A/L2-Pr11(0); Rev. 0; Effective date: 1/6/2016. Identified findings recorded in documented information including Integrated Sustainability Internal	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	implement the necessary corrective action. <b>- Major compliance -</b>	Audit Checklist, Non-Compliance Findings and Recommendations form as per sighted for the latest audit conducted on 19/8/2019. Sighted the Corrective Action Report on Non-compliance Findings on the analysis of nonconformity raised.	
<b>4.1.2.3</b>	Report shall be made available to the management for their review. <b>- Major compliance -</b>	Report made available for review in the management review meeting and recorded in the minutes under agenda titled result of audits – internal & external.	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>	Latest management review conducted on 13/9/2018 as per records of minutes of meeting FGVPM Ladang Keratong 11 MSPO Management Review Meeting # 01/2019; Date: 7/9/2019.	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>	As per Ladang FGV Keratong Sebelas Penambahbaikan Berterusan Alam Sekitar, Sosial, Penghasilan which includes the following: - Planting of beneficial plant – for up to 100 within short period - Increase of wages for workers through quality program implementation	Complied
<b>4.1.4.2</b>	The company shall establish a system to improve practices in line with new information and techniques or new industry	Technique introduced in FGVPM estates as “Implement Tractor” which implementing the use of tractor with compatible machine such grader,	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	standards and technology (where applicable) that are available and feasible for adoption. <b>- Major compliance -</b>	back-pusher, rotor-slasher, spreader and tipper trailer. The estate also use Mini Tractor Grabber for flat area FFB evacuation.	
<b>4.1.4.3</b>	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. <b>- Major compliance -</b>	Training for east region FGVPM estates were conducted in FGV Chador 01 on 13-14/3/2019 by Sime Kubota.	Complied
<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>	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. <b>- Major compliance -</b>	Information related to MSPO requirements provided to contractors in the form of letter of agreement (Surat Persetujuan E6.4.1) as the method to made contractors understand. Sighted few samples of signed form as per following: <ul style="list-style-type: none"> <li>- Contractor: Sinar Firdaus Jay; Signed date: 10/1/2019</li> <li>- Contractor: Kejuruteraan Syazak; Signed date: 7/1/2019</li> <li>- Contractor: Syarikat Perniagaan Haji Yusof; Signed date: 13/9/2018</li> </ul>	Complied
<b>4.2.1.2</b>	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.	Documents i.e. policy and work procedures are available and contractors knows that they can obtain it from the office. Workers are also aware on the documents i.e. sustainability policy and safe work procedures.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
<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.  - Major compliance -	Procedure for communication and consultation ML-1A/L2-Pr 12(0) has been established for communication with internal and external stakeholders	Complied
<b>4.2.2.2</b>	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.  - Minor compliance -	As per letter of appointment ref. # (01)RSPO P1,P6; Date: 10/1/2019 of Mr. Lokman Bin Ibrahim, Assistant Manager of FGV Keratong 11 Estate.	Complied
<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.  - Major compliance -	The list of stakeholders were recorded in file E1.4.2 (Stakeholder) that has listed few categories of stakeholders including neighbours, internal stakeholders and external stakeholders.  Internal stakeholder consultation meeting Sesi Perjumpaan Bersama Regional Controller; Date: 19/11/2019.  External stakeholder meeting as per records of Majlis Perjumpaan Bersama Pihak Yang Berkepentingan/Stakeholder Berkenaan Pensijila MSPO/RSPO Anjuran Bersama CDD, Felda Wilayah Kuantan, FGVPM Wilayah Segamat & FGVPM Wilayah Bera Kompleks Keratong 03, Kompleks Keratong 02 & Kompleks Keratong 09; Dewan Wisma Keratong 09 Felda Keratong 09; Date: 8/8/2017.	Complied
<b>Criterion 4.2.3 – Traceability</b>			

Criterion / Indicator		Assessment Findings	Compliance
<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>	FGV has established SOP for traceability for all estate and documented in 'Manual Ladang Sawit Lestari – Mengangkut BTS ke Kilang'. Refer doc no. MLSL (Ed.3)-Sec.4 (8.0) issued on 1/9/2017.  The SOP used sets of form to be filled by the estate to trace the origin of the FFB.  i. Labelled for lorry – Lorry no., Estate Name, Mill Name  ii. FFB quality certificated – Field/Blok, Total FFB, Average Bunch Weight, Estimate weigh, date.  iii. FFB dispatch note	Complied
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	FGV have established systems to monitor the implementation of the traceability systems in the mill thorough Internal Audit conducted by the Plantation Sustainability Department. Latest Internal audit was conducted on 23/9/2019.	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 management appointed Mr. Lokman Bin Ibrahim, Assistant Manager as the person in-charge of implementation and maintenance of traceability system as per letter of appointment ref. # (01)MSPO; Date: 15/2/2019.	Complied
<b>4.2.3.4</b>	Records of sales, delivery or transportation of FFB shall be maintained. <b>- Major compliance -</b>	Records of production and delivery of FFB were well maintained as per following sampled the last 2 years weighbridge FFB ticket as below:  - Nota Hantaran: 0017797 - Lorry no: JLH9729 - Buyer name: FELDA Keratong 4 - Seller name: Juhari bin Ali	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>- Quantity: 02.05 MT</li> <li>- Date: 23/03/2017</li> </ul>	
<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 are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p><b>- Major compliance -</b></p>	<p>FGVPM has established SOP on track changes, monitoring, implementation and compliances of legal and other requirement. Refer doc. no ML-1A/L2-Pr6 (0) dated 1/6/2016.</p> <p>Plantation and Sustainability Department and Manager for respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement. To monitor the status of legal compliance, the management has appointed the Supply Clerk, Norfadzilah Binti Ismail, as per letter ref. # (01) RSPO/P5; Date: 10/1/2019.</p> <p>All legal requirement was documented in Register of Legal and Other Requirements (Ref doc no FPI/L4/QOSHE-2.1 Pind. 0) and List of compliance license/permit/legal requirement.</p> <p>Compliance to each applicable law and regulation is monitored by the operating units. Sighted the sampled evidence of compliancy to the regulation as follows:</p> <ul style="list-style-type: none"> <li>- MPOB license # 558962002000 – Ladang Felde Keratong Sebelas (Sales &amp; Handling: FFB #); Validity period: 1/3/2019 – 29/2/2020; Estate area: 1,178.31 ha</li> </ul>	Complied



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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>- Schedule Control Goods Permit; Serial # P(C000017-RPN); Ref. # PHG/RPN/045/98 SK(D); Goods Description: Diesel (Unsubsidized); Volume: 10,920 liters; Validity period: 28/2/2019 – 27/2/2020</li> <li>- Jabatan Tenaga Kerja Semenanjung Malaysia Permit Potongan Daripada Gaji Pekerja (Seksyen 24 Akta Kerja 1955); For "pembayaran yuran bulanan Badan Kebajikan Petugas Felda Palm Industries; Serial # PP3/34/1013; Effective date: 16/1/2005; Requires following:               <ul style="list-style-type: none"> <li>- Total deduction &lt;50% or 75% if involved housing loan</li> <li>- Letter of agreement signed by workers shall be kept and shown to Labour Officer anytime requested</li> <li>- New application shall be made if particulars of deduction changes from approved by permit (Ref. Certificate of Incorporation on Change of Name of Company: Felda Palm Industries Sdn. Bhd. to FGV Palm Industries Sdn. Bhd.; Date of original incorporation: 14/9/1995; Date of name change: 11/12/2018</li> <li>- Employer shall provide particulars relevant to permit upon request by Labour Office from time to time</li> <li>- Permit shall be displayed on strategic location easy to be viewed by workers</li> </ul> </li> </ul>	
<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>The estates visited has established and documented all related legal requirement in Legal and other Requirement Register. Refer document no. ML-1A/L5-AP2 pind 0. Latest review was done on 1/10/2019 with addition on Occupational Safety and Health (Noise Exposure) Regulations 2019 and Employer's Circular No. 3 Year 2018, Employees' Social Security Act, 1969.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 operating units visited monitor the validity period of the license through form 'Mekanisma Pematuhan Lesen/Permit/Keperluan Undang-Undang'. Latest update of register was done on 29/9/2019.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. <b>- Minor compliance -</b>	The estate has appointed person responsible for each operating unit to monitor the compliance to legal and other requirements. Sustainability Department, Regional Compliance Unit and Internal Audit Department conducted internal audit to check the compliancy to related legal and other requirement on annually basis.  FGV has established guidelines to track any changes in the law and documented in 'Sistem semakan Perubahan Undang-Undang' and 'Sistem Pengesanan Perubahan Undang-Undang' Pindaan 4 dated 1/2/2018.	Complied
<b>Criterion 4.3.2 – Lands use rights</b>			
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. <b>- Major compliance -</b>	There is no land dispute in Keratong 11 Estate as sampled during time of audit. Verified the information through the land titles and feedback from Estate Manager.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. <b>- Major compliance -</b>	Keratong 11 Estate has the land title no: HSD 3648 Lot: PT 8141 (567.7 Ha) and HSD 3649 Lot PT 8142 (628.7 Ha) valid until 25 Aug 2097. The conditions is to be used for Oil Palm Plantation only.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. <b>- Major compliance -</b>	Available a map of Keratong 11 Estate showing boundary marking. In the south adjacent to Ladang DSK Far East (Formerly known as Pahang Plantation). In the north adjacent to Hutan Simpang Lesung. A total of 13 Blocks in Keratong 11 Estate. Sampled at Boundary of Hutan Simpan Lesung in Block 3 found electrical fence erected at the border and marking with white and red pipe. At Block 4 as sampled a border with Ladang DSK Far East clearly marked with white and red pipe at drainage between both estates.	Complied
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). <b>- Minor compliance -</b>	There is no land dispute in the certification unit and supply base at the time of audit. Verified the information through the land titles and during stakeholder's consultation.	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>	The mapping shows that there is no customary land in this area. Land is leased by Felda HQ from state government from 1998. (99 years lease) Location of estate is between other Felda estates and no customary community or small holders around Keratong 11.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. <b>- Minor compliance -</b>	Maps are available identifying the demarcation of the land and no customary land around this area.	Complied

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<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. <b>- Major compliance -</b>	Group Sustainability Policy dated 29/05/19 and procedure FPIC (ML-1A/L2-Pr10 (0) is available but no evidence of any claims.	Complied
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. <b>- Minor compliance -</b>	<p>Assessment conducted base on procedure "Penilaian Impak Sosial (SIA)"; Doc. # FGV/ML-1A/L2-Pr21; Issue # 1; Rev. # 2; Effective date: March 2019 stating that re-assessment of management action plan to be conducted at least once a year. External stakeholder consultation to be conducted at least once in every 5 years.</p> <p>Social impact identified and plans were implemented in-line with document sighted as Laporan Penilaian Kesan Impak Sosial Ladang Felda Keratong 11; Doc. type: RSPO 2017 (Kriteria 6.1); Doc. # 1/2017; Effective date: 28/12/2017 by Sustainability Compliance and Certification Department (SCC), FGVH. Updated management action plan documented in Penilaian Impak Sosial (Negatif/Positif) berkaitan aktiviti tanam semula di Ladang Keratong 11:</p> <ul style="list-style-type: none"> <li>- Awareness on replanting among local communities</li> <li>- No complaints on river water pollution due to replanting</li> </ul>	Complied
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented. <b>- Major compliance -</b>	As per records of Buku Aduan (Complaints Book) sighted latest complaint dated 5/8/2019 by Staff on main water supply pipe leakage. Complaint was resolved on 16/8/2019.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - <b>Major compliance</b> -	As per records of Buku Aduan (Complaints Book) sighted latest complaint dated 5/8/2019 by Staff on main water supply pipe leakage. Complaint was resolved on 16/8/2019. Earliest complaints recorded was on 7/1/2018.	Complied
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> -	The grievances recorded in Complaint Book and Housing Repair Request Form. As per SOP for Complaint & Grievance (Doc no: FGV/ML-1A/L2-Pr13 issue 01, revision 02 dated 01.04.2019, under clause 7.2.2 external stakeholder, the complainant will be kept informed within 2 weeks from the complaint receiving date. The latest record sighted on 20/08/2018 on broken gate by Ikhwan, (FELDA Keratong 03).	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> -	Policies communicated to employees during daily muster assembly and meetings as recorded in the muster briefing records on on 04/04/2019 to all 126 people in Keratong 11 Estate.	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> -	As per records of Buku Aduan (Complaints Book) sighted latest complaint dated 5/8/2019 by Staff on main water supply pipe leakage. Complaint was resolved on 16/8/2019. Earliest complaints recorded was on 7/1/2018. Status column not filled-in.	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.	As per sample contribution:	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- <b>Minor compliance</b> -	<ul style="list-style-type: none"> <li>- Donation to Persatuan Ibu Bapa Dan Guru (PIBG) Sekolah Menengah Kebangsaan Kebangsaan (SMK) Chanis for Computer Room Air Conditioner Purchase; Date: 18/11/2019</li> <li>- Donation to Sekolah Kebangsaan (LKTP) Keratong 7 for Education Outstanding Appreciation Program; Date: 20/11/2019</li> </ul>	
<b>Criterion 4.4.4:</b> Employees safety and health			
<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>Safety and Health Policy from FGV signed by Dato Zakaria Arshad (Group President/CEO) dated 01/04/16. Consist of commitment to comply with legal requirements, managing HSE risk, continual improvement in HSE in meeting best practices. While in Sustainability Policy (FGV/SED/POL/001) dated 01/09/16 under 8.3 Safety and Health. FGV Group is committed to ensure safe and healthy work environment, prevention of incident, Complying with legal requirements. OSH was plan as stated in Safety and health Plan Medical Surveillance, Briefing on OSH Policy, Meeting of SHC, Pengurusan PPE, First Aid Training, Fire Drill and etc.</p>	Complied
<b>4.4.4.2</b>	<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:</li> </ul>	<p>Risk assessment was conducted as sampled for harvesting activity. As observed during site visit found no proper Terrence at Block 5 year planted 2000 which at slope area that have potential fall down. The risk of harvester working at the slope area to be considered with better risk control measures proposed. Hirarc conducted on 27/07/19 by Lokman b. Ibrahim. It was not included. Hirarc was conducted included the risk of harvesting at electrical line.</p>	OFI

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Criterion / Indicator	Assessment Findings	Compliance
<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> <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 and 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 trust must have knowledge and access to latest national regulations and collective agreements.</li> <li>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.</li> <li>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</li> </ul>	<p>Training on OSH was plan as stated in Annual Training Programme 2019. Among listed:</p> <ul style="list-style-type: none"> <li>a) Briefing on OSH Policy (Jan)</li> <li>b) Meeting of SHC (Jan, Apr, Aug, Oct)</li> <li>c) Pengurusan PPE (Jan)</li> <li>d) First Aid Training (Apr, Sept)</li> <li>e) Chemical Management</li> </ul> <p>PPE as sampled for harvester (safety boots, helmet) provided by employer Ozot Miah, Abdul Rejab, Hussain Shahjalal. While maintenance workers Mahmood and Sanjay provided with helmet and safety boots. Available a procedure for PPE Management (FGV/FGVPM/GP/001) date 30/02/29 Rev. 00. Available a record of distribution and return of PPE. It was well recorded and maintained as verified.</p> <p>CHRA (REF. No: JKPP HIE 127/171/2(8)-2018/013) – done by Dr Yasriza bin yahaya (JKPP HIE 127/171/2(8) valid from 26 Nov 2017 – 25 Nov 2020, Date assessment 13 February 2018. From Occumed consultancy &amp; services Sdn bhd.</p> <p>In Keratong 11 Estate, the OSH committee appointed on 10 January 2018. Sampling record on Rosmaria binti Ab razak as management representative (38)483/ESH PSQM/FGVPM/TEMS and Azmi Bin Zainudin also as management representative (37) 483/ESHPSQM /FGVPM/TEMS.</p>	

Criterion / Indicator		Assessment Findings	Compliance
	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. j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. <b>- Major compliance -</b>	f) JKPP 8 was submitted to DOSH through MyKKP for 2018 data by Mohamad Faizal b. Mohamad Fuaat on 23/01/19.	
<b>Criterion 4.4.5: Employment conditions</b>			
<b>4.4.5.1</b>	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. <b>- Major compliance -</b>	Group Sustainability Policy - Respect for Human rights clause 5.1.3 clearly states on human rights, free from exploitation and bonded labour, human trafficking and child labour. During internal stakeholders' discussion on 16/10/19, it was evident that the employees was able to demonstrate understanding on Sustainability Policy.	Complied
<b>4.4.5.2</b>	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. <b>- Major compliance -</b>	Group Sustainability Policy – Responsible Employment clause 5.1.2 explains on equal treatment and no discrimination regardless of age, race, religion, nationality, social origin, color etc. During internal stakeholders' discussion on 16/10/19, it was evident that the employees were clear with equal rights and discriminatory practices.	Complied
<b>4.4.5.3</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	Employment Process Based on Procedure of Recruitment & Selection SOP; SOP # FGV/GHR/SOP/004; Rev. # 2.0; Effective date: 13/6/2018.	Complied



Criterion / Indicator		Assessment Findings	Compliance
	<p>on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>All work agreements were still according to the existing Collective Agreement "Perjanjian Bersama Antara Felda Global Ventures Plantations (M) Sdn. Bhd. Dengan Kesatuan Pekerja-Pekerja Felda Global Ventures Plantations (Malaysia) Sdn. Bhd. (Semenanjung); 1/1/2016 – 31/12/2018. The Collective Agreement; Ref. # COG 016/2016; was still been used whilst pending the new agreement. Documentation of pay and conditions sighted available as per following samples:</p> <ul style="list-style-type: none"> <li>- Employee # FW04830488; Job: General Worker-Operational; Date joined: 20/8/2019; Nationality: Indonesia</li> <li>- Employee # FW04830410; Job: Harvester; Date joined: 20/4/2018; Nationality: Bangladesh</li> <li>- Employee # FW4830465; Job: Harvester; Date joined: 3/7/2018; Nationality: India</li> <li>- Employee # FW04830312; Job: Harvester; Date joined: 30/1/2016; Nationality: Indonesia</li> <li>- Employee # FW0480486; Job: General Worker-Operational; Date joined: 9/7/1985; Nationality: India</li> </ul>	
<b>4.4.5.4</b>	<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>As documented in FGV Holdings Berhad Group Sustainability Policy, Doc. No.: FGV/SED/POL/001, Rev 3, effective date: 29.05.2019, Chapter 5.1.3.1 – Respect for Human Rights. FGV has defined hiring of workers is 18 and above due to the nature of work.</p> <p>Sighted the contractors for Keratong 11 Estate = Perniagaan Maju Bera &amp; MFM Afdhal Enterprise.</p>	Complied
<b>4.4.5.5</b>	<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</p>	<p>There is master file document for all workers with all information.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p><b>- Major compliance -</b></p>		
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><b>- Major compliance -</b></p>	<p>All the employment contract on the sampled workers as per 4.4.5.3 are sighted and available during the audit and signed by workers.</p>	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><b>- Major compliance -</b></p>	<p>The overtime is recorded in the punch card system and paid accordingly. Seen all the employees' punch cards with the form titled 'Permohonan Kebenaran Kerja Lebih masa' filled up by workers for the overtime. Seen the overtime record for office workers while no overtime offer to the general workers.</p>	Complied
4.4.5.8	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p> <p><b>- Major compliance -</b></p>	<p>As per employment contract, the working hour is 8 hours/day. Seen all the employees' punch cards with the form titled 'Permohonan Kebenaran Kerja Lebih masa' filled up by workers for the overtime. Seen the overtime record for office workers while no overtime offer to the general workers.</p>	Complied
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p><b>- Major compliance -</b></p>	<p>The payslip and the inputs were reviewed to confirm the wages and overtime is in line with legal requirements of Employment Act 1955 and worker's employment contract. Verified the approval on the 'Rumusan Laporan Kelulusan dan Bayaran Tuntutan Kerja Lebih Masa.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
<b>4.4.5.10</b>	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.  - <b>Minor compliance</b> -	Water and electricity subsidy, group productivity incentive for the harvesters, school bus, safe box for passport with key, death benefit for deceased family members, health benefit at clinics.	Complied
<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 in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.  - <b>Major compliance</b> -	Water for domestic usage is provided from Jabatan Bekalan Air and Tenaga Nasional Berhad with subsidize rate as per collective agreement which are RM15/month for electric and 35 gallon/people/day or RM3.00/people/month with limit of RM15.00/month/family. Besides, government clinic was available in the complex where the employees can easily access to the medical facilities. The employees have provided with AIA Medical Card where they are allowed to visit any panel clinic without paying the medical fees.  In Keratong 11 Estate, the linesite inspection been conducted by Kerani HEP in weekly basis.	Complied
<b>4.4.5.12</b>	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.  - <b>Major compliance</b> -	Procedure on Sexual Harassment and Violence Complaints/Grievances through the Women Committee (ML-1A/L2-Pr14) was available.  In Keratong 11 Estate, Puan Nor Azinlina Bt Ihak is appointed as the Gender Committee chairman and the meeting was conducted on 07/03/2019 attended by 10 female workers/  There is no sexual harassment case reported so far in Keratong Complex.	Complied

Criterion / Indicator		Assessment Findings	Compliance
<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>Management does not restrict based on Group Sustainability Policy Clause 5.1.2 on free trade association.</p> <p>Sighted records of union representative meetings i.e. Perjumpaan Bersama Ketua Pegawai Sumber Manusia (CHRO) En. Mazri Abdul Rahim Dengan Exco Kesatuan Pekerja-Pekerja FGVPMSB; Date: 31/1/2019; Venue: Wisam FGV KL</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 exposed to hazardous working conditions.</p> <p><b>- Major compliance -</b></p>	<p>Group Sustainability Policy clause 5.1.3.2 covers minimum age to follow the local legislation and no young person allowed to be employed. Name list of employees was sighted and the youngest employed worker is 19 years old.</p> <p>During stakeholders' consultation of contractor and workers, they are clear that minimum age of work by law is 18 years old.</p>	Complied
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p><b>- Major compliance -</b></p>	<p>Keratong 11 Estate ensures all employees, contractors and relevant smallholders are appropriately trained as per Training Programme 2019 established. The related records were kept in the form of attendance list. Among listed such as:</p> <ul style="list-style-type: none"> <li>• First Aid training planned in May</li> <li>• Basic Use of Fire Extinguisher planned in Feb, June and Oct</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>• Spraying and use of Proper PPE training planned and conducted in February.</li> <li>• Use of Spraying Pump training planned and conducted in March.</li> <li>• Harvesting training planned in March and September.</li> </ul>	
<b>4.4.6.2</b>	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p><b>- Major compliance -</b></p>	<p>Available a Training Needs Analysis established and documented for 2019. This to provide the specific skill and competency required to all employees based on their job description as stated from Estate Manager, Assistant until all levels including harvester, clerks, drivers and etc. A matrix clearly indicated the training needed for all positions.</p>	Complied
<b>4.4.6.3</b>	<p>A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p> <p><b>- Minor compliance -</b></p>	<p>Among continuous training planned conducted included as sampled:</p> <ul style="list-style-type: none"> <li>• Spraying and use of Proper PPE training planned and conducted on 25/04/19</li> <li>• Chemical handling and Hirarc conducted on 29/08/19 attended by 8 employees.</li> <li>• Upkept training conducted on</li> <li>• Scheduled Waste handling training conducted on 18/11/19 attended by 10 employees.</li> <li>• Manuring training was conducted on 16/03/19 attended by 12 employees.</li> <li>• Driving training for tractor and vehicle conducted on 05/07/19.</li> <li>• First aid training conducted on 11/09/19.</li> </ul>	Complied
<p><b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b></p>			

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<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. <b>- Major compliance -</b>	An environmental policy was available as part of FGV Holdings Berhad established Group Sustainability Policy; signed by the Chairman, Board of Directors; Datuk Wira Azhar Abdul Hamid; Approved date: 29/5/2019; Policy # FGV/SED/POL/001; Rev. 3; Effective date: 29/5/2019.	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. <b>- Major compliance -</b>	Environmental aspect and impact assessment as verified in Pengenalpastian Aspek dan Penilaian Impak (FGV/FGVPM/IV/IMS/15/1.6 Pind 1) dated 02/02/19 prepared by Lokman b. Ibrahim for Chemical Store.	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. <b>- Major compliance -</b>	Action plan to mitigate negative impact established as sampled in Laporan Aspek Impak Alam Sekitar Melalui Aktiviti Perladangan, Bahan Buangan dan Pencemaran dated 06/01/18 covering empty containers, spillage at mixing and chemical store and protection of water course.	Complied
<b>4.5.1.4</b>	A programme to promote the positive impacts should be included in the continual improvement plan. <b>- Minor compliance -</b>	A Programme to promote positive impact found identified and established in similar format dated 06/01/18. Zero burning, cover crop at high slope and returning back fertilizer bags.	Complied
<b>4.5.1.5</b>	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	Available a record of environmental policy training conducted during Roll Call dated 04/04/19 at Roll Call area by Estate Manager. Scheduled waste Training was conducted on 18/11/19 and attended by 14 employees.	Complied

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	objectives. - <b>Major compliance</b> -		
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - <b>Major compliance</b> -	Regular meeting on environmental quality was conducted and discussed as evidence to support this from Minute of meeting conducted for Safety and Health Committee dated 26/02/19, 14/05/19, 28/08/19, 18/11/19. The environmental quality issues to be further enhanced and mentioned in the future meeting.	OFI
<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. - <b>Major compliance</b> -	Consumption of diesel and electricity and closely monitored by establishing baseline values and trends from the source of usage such as vehicles, tractors, housing and office usage for the year 2019.	Complied
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - <b>Major compliance</b> -	Keratong 11 Estate has monitoring the diesel consumption on monthly basis. Date available as sampled until October 2019. For the year 2019 the planned usage for diesel was 21, 032 Litres	Complied

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<b>4.5.2.3</b>	The use of renewable energy should be applied where possible. <b>- Minor compliance -</b>	At the moment no renewable energy applied in Keratong 11 Estate. Future consideration based on budget and FGV financial stability such as solar panel.	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>	All waste products and sources identified in Type of waste and Source of waste. A Domestic Waste Management Procedure (FGV/FGVVPM/II/IMS/15/01B).	Complied
<b>4.5.3.2</b>	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products <b>- Major compliance -</b>	Available Waste Management Plan 2019 for domestic waste from operation and office & Housing approved by Estate Manager. Available Action Plan to Reduce Environmental Impact through 3R (Reduce, Reuse and Recycle) for waste generated dated 18/09/14.	Complied
<b>4.5.3.3</b>	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. <b>- Major compliance -</b>	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 under Scheduled Waste Magement Procedure (FGV/FGVVPM/II/IMS/15/01A).	Complied



Criterion / Indicator		Assessment Findings	Compliance
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>Kerating 11 Estate implementing triple rinse and punching as approved by DOE. The disposal was conducted accordance to the requirements and avoiding contamination of water sources. Observed during site visit found all empty containers were properly stored and ready to be disposed.</p>	Complied
4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p><b>- Minor compliance -</b></p>	<p>There is a document on identification of waste product in FGV/ML1A/L2-Pr23 dated on 01/06/2016. Sighted there is linkages available for the source of pollution and to identify category of waste [schedule or non-schedule waste]. Domestic waste being collect on weekly basis (Monday Wednesday and Saturday). The office has records maintain for the collection. The types of domestic waste categories into organic waste [general house waste] and 3R waste [paper, iron and plastic]. Domestic waste was disposed at landfill at Block 6 where found no segregation of domestic waste between organic and inorganic in the landfill sighted. No recycling was practiced as required from 3R Programme 2019.</p>	Minor noncompliance
<b>Criterion 4.5.4: Reduction of pollution and emission</b>			
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.</p> <p><b>- Major compliance -</b></p>	<p>Monitoring of the GHG quantity was done through PalmGHG calculator, where annual quantification of all GHG sources was input into the calculator. Default values of emissions factor Calculation of the GHG emissions were derived from publicly available sources. The latest GHG assessment using data in 2018.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
<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> -	Keratong 11 estate identified the pollution and emission that give impact to environment. The action plan available under title Control of Environmental Pollution Action Plan 2019. The items that been cover in this action plan included No open Burning campaign, Reduction on diesel usage, Reduction in chemical usage, Optimization on recycle waste programed and Environment awareness campaign	Complied
<b>Criterion 4.5.5: Natural water resources</b>			
<b>4.5.5.1</b>	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: <ul style="list-style-type: none"> <li>a. Assessment of water usage and sources of supply.</li> <li>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.</li> <li>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.).</li> <li>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.</li> </ul>	Keratong 11 Estate has established a Water Management Plan dated 30 April 2018. Estate using raw water from Jabatan Air Pahang for their operation and housing and they have monitored water used.  The action plan to monitor and reduce water wastage and protection of water courses were established. There was no gazzated river in Keratong 11 Estate. However protection of water course such as drainage where water is flowing in the estate clearly marked with prohibition of spraying and clear signage.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<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>		
<b>4.5.5.2</b>	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p><b>- Minor compliance -</b></p>	Observed during site visit during audit no gazzated river in the estate and no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	Complied
<b>4.5.5.3</b>	<p>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>	Water harvesting practices found implemented as observed during site visit in the estate as Block 3, 7 and 8. Drainage system in the estate was build and a water pit as road side to contain the moisture for soil in the field.	Complied
<b>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</b>			
<b>4.5.6.1</b>	<p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat</p>	HCV assessment have been conduct on 27 December 2017 by Amir Hamzah Dollah @ Abdullah. Keratong 11 Estate is adjacent to Hutan Simpan Lesung where potential wild animal and rare and protective species lived. During site visit at Block 4, sighted a group of wild board in the estate. The program to regularly educate the workforce and community about the status of these RTE species are also established with on-going consultation with the relevant authorities such as the State Wildlife department, Forestry department and etc.	Complied

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	<p>requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</p> <p><b>- Major compliance -</b></p>		
<b>4.5.6.2</b>	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p><b>- Major compliance -</b></p>	<p>Observed at the border of Hutan Simpan Lesung at Block 4. Available signage or prohibiting hunting of rare, threaten and endangered species such as wild boar, tiger, elephant, Tapir, Ular sawa, landak.</p> <p>During site visit also sighted no fishing and no hunting signage at the estate.</p>	Complied
<b>4.5.6.3</b>	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p><b>- Major compliance -</b></p>	<p>The action plan is available under report HCV, under section 6.0 Biodiversity Management Plan for FGVM Keratong 11 (2017-2022). The action plan covering 4 areas such as Boundary area between Keratong 11 Estate with Lesung Forest Reserve, Buffer zone for small stream, Non-Economic area/ Non production area.</p>	Complied
<b>Criterion 4.5.7: Zero burning practices</b>			
<b>4.5.7.1</b>	<p>Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.</p> <p><b>- Major compliance -</b></p>	<p>There was no evidence of fire used for burning of waste including land preparation for replanting observed in Block 3, 4, 6, 8 and landfill area.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. <b>- Major compliance -</b>	Not applicable as no cases of crop with high disease in Ladang Keratong 11.	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. <b>- Major compliance -</b>	Not applicable since no open burning conducted.	Complied
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. <b>- Minor compliance -</b>	From the Manual Ladang Sawit Lestari Edisi III (MLSL(Ed.2) – Sec 2(6.0) dated 1 June 2012 stated during replanting the crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched which the plant that need to be replace. During in visit at replanting field under Peringkat PR18D with Hectarage 156.29 Ha verified no fire is using during replanting activity.	Complied
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Site Management</b>			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. <b>- Major compliance -</b>	Standard Operating Procedures (SOPs) for Ladang Keratong 11 are documented. 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; - Manual Ladang Sawit Lestari (Sustainable Oil	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Palm Manual) – Pengurusan Tapak Semaian Sawit (Oil Palm Nursery Management); Edisi 3 - Manual Ladang Sawit Lestari (Sustainable Oil Palm Manual) – Pembangunan Semula Sawit (Oil Palm Replanting); Edisi 3 - Manual Ladang Sawit Lestari (Sustainable Oil Palm Manual) – Sawit Pra Matang (Premature Oil Palm); Edisi 3 - Manual Ladang Sawit Lestari (Sustainable Oil Palm Manual) – Sawit Matang (Mature Oil Palm); Edisi 3 - Manual Ladang Sawit Lestari (Sustainable Oil Palm Manual) – Sawit Matang (Mature Oil Palm); Edisi 3	
<b>4.6.1.2</b>	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.  <b>- Major compliance -</b>	Available a Terece procedure manual Ladang Sawit Lestari (MLS (Ed.3)-Sec.2 (11.0) Rev. date 01/09/17 to prevent both soil erosion as well as siltation of drains and waterways. Measures in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.	Complied
<b>4.6.1.3</b>	A visual identification or reference system shall be established for each field.  <b>- Major compliance -</b>	In Keratong 11 Estate there is 13 Blocks Observed a clear block marking at Block 4, 6, 7 and 8 and visibly seen.	Complied
<b>Criterion 4.6.2: Economic and financial viability plan</b>			
<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>	Available as sampled an annual business plan in the form of budget and the projection for 5 years prepared as guidance for future planning. The business plan contains FFB yield @ crop review, CPO, OER, and KER, OPEX, CAPEX etc. Felde Global Ventures Plantation (M) Sdn Bhd. A 5 years Business Plan 2017 – 2021 was seen during	Complied

Criterion / Indicator		Assessment Findings	Compliance
		assessment. As for the estates, budget titled "Anggaran Perbelanjaan Am Bagi 2018-2021" and " Rumusan Bajet" from 2019 – 2021 available for review.	
<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.  <b>- Major compliance -</b>	Available as sampled Annual Replanting Programme established, sighted and recorded under file E3 Ekonomi under Pengeluaran Hasil (RSPO – P3/c.3.1/3.1.2), the plan cover from 2018 until 2023 with total hectarage of replanting:  2018 – 156.26ha 2020 – 225.22ha 2023 – 342.24ha	Complied
<b>4.6.2.3</b>	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production : cost per tonne of FFB d) Price forecast e) e) Financial indicators : cost benefit, discounted cash flow, return on investment  <b>- Major compliance -</b>	The business or management plan found contained attention to quality of planting materials and FFB, Crop projection such as site yield potential, age profile, FFB yield trends, Age profile, FFB yield trends that available for year 2018 until 2020	Complied
<b>4.6.2.4</b>	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.	The management plan effectively implemented and the achievement of the goals and objectives found regularly monitored, periodically reviewed and documented. Keratong 11 Estates established "Estate	Complied

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	- Major compliance -	monthly Costing” for monitor monthly performance in FFB, Account workers’ wages, workers’ productivity, capital expenditure, progress of works and cost to maturity for replanting area.	
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Pricing for services is based on tender mechanism. Guidelines of tender is available and sent to contractors for services.  Sighted the contractors for Keratong 11 Estate i.e. Perniagaan Maju Bera & MFM Afdhal Enterprise sampled tender award letters in 2019.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	All contracts are based on tender selection and contracts are agreed with successful bidders and contract is available and payment is made on time. Sampled external stakeholder discussion 10/3/2019 – contractors stated that they receive payment before 10 <sup>th</sup> of each month and this is further verified with payment slip acknowledged by contractor e.g. MFM Afdhal Enterprise for Sep 2019 payment.	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. - Major compliance -	Information related to MSPO requirements provided to contractors in the form of letter of agreement (Surat Persetujuan E6.4.1) as the method to made contractors understand. Sighted few samples of signed form as per following:  - Contractor: MFM Afdhal Enterprise; Signed date: 10/3/2019 - Contractor: Syarikat Perniagaan Maju Bera; Signed date: 8/8/2019	Complied



Criterion / Indicator		Assessment Findings	Compliance
4.6.4.2	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p><b>- Major compliance -</b></p>	<p>Evidence provided based on the sample contractor engagement as per following purchase order:</p> <ul style="list-style-type: none"> <li>- Contract # 5300003083; Contractor: MFM Afdhal Enterprise; Scope of Work: Transport of FFB from Ramp to Mill; Contract period: 1/6/2019 – 31/5/2020</li> <li>- Contract # 5300002395; Contractor: Perniagaan Maju Bera; Scope of Work: Transport of FFB from Field to Ramp and from Ramp to Mill; Contract period: 1/10/2019 – 30/9/2020</li> </ul>	Complied
4.6.4.3	<p>The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.</p> <p><b>- Minor compliance -</b></p>	<p>Based on the contract between FGV and their contractor, a letter stating the contractor should allow external auditors from certification bodies to conduct audit by checking documents, operation verification and interview with contractor /contractor workers. This letter is signed by contractor as consent as sighted few samples of signed form as per following:</p> <ul style="list-style-type: none"> <li>- Contractor: MFM Afdhal Enterprise; Signed date: 10/3/2019</li> <li>- Contractor: Syarikat Perniagaan Maju Bera; Signed date: 8/8/2019</li> </ul>	Complied
4.6.4.4	<p>The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted.</p> <p><b>- Major compliance -</b></p>	<p>On FFB transporters a reconciliation databank on a monthly basis for MFM Afdhal Enterprise (C/N: 5300003083) from mill is reconciled through monthly report by estate and agreed by contractor.</p>	Complied
<b>4.7 Principle 7: Development of new planting</b>			
Not applicable since there is no new planting at Keratong 3 Palm Oil Mill Certification Unit			

**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> -	FGV Group Sustainability Policy covers MSPO commitment (clause 5.0) FGV/SED/POL/001(rev 3) dated 29/05/2019 and approved by Board of Directors (Datuk Wira Azhar Abdul Wahid)	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> -	Policy states commitment to economic improvement, environmental sustainability and social and improve milling productivity and profitability.	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 was planned as per Internal Audit Procedure; Doc. # ML-1A/L2-Pr11(0); Rev. 0; Effective date: 1/6/2016 and conducted on 21-22/8/2019 by a team of internal auditors personnel from FGV HQ.	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. - <b>Major compliance</b> -	Established as FGV Internal Audit Procedure; Doc. # ML-1A/L2-Pr11(0); Rev. 0; Effective date: 1/6/2016. Identified findings recorded in documented information including Integrated Sustainability Internal Audit Checklist, Non-Compliance Findings and Recommendations form as per sighted for the latest audit	Complied

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		conducted on 21-22/8/2019. Sighted the Corrective Action Report on Non-compliance Findings on the analysis of nonconformity raised.	
<b>4.1.2.3</b>	Reports shall be made available to the management for their review. <b>- Major compliance -</b>	Report made available for review in the management review meeting and recorded in the minutes under agenda titled result of audits – internal & external.	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>	Latest management review conducted on 13/9/2018 as per records of minutes of meeting FGVPI Keratong 3 Palm Oil Mill MSPO Management Review Meeting # 01/2019; Date: 15/10/2019.	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>	Action plan for continual improvement was established as per Procedure for Continual Improvement; Doc. # ML-1A/L2-Pr7(0); Rev. # 0; Effective date: 1/6/2016. Action plans available to include the issues from social, environmental impact, safety and health and quality. Sampled plans includes the following: <ul style="list-style-type: none"> <li>- Pollution prevention: Installation of Boiler Stack CEMS</li> <li>- Workers wellbeing: Upgrading of labour quarters</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.  - Major compliance -	Any new information is updated to employees through morning briefings, memo, meetings, station training. The latest technology that has been plan by the mill was to install dust collector. The letter from FGV to DOE was sighted.	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	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.  - Major compliance -	Keratong 3 POM has maintained records of request and response, land titles, OSH plans and etc. relating to environmental and social issues, plans for pollution prevention, complaints and grievances records that make available upon requests. Sample internal and external requests sighted as following:  - Request on Training Project Univez (Procurement) at Temerloh region response letter ref. # (066) 010/HQ/882/PP/2019; Date: 3/9/2019  - Request on EFB collection from mill by estates response letter ref. # (03) 010810/HQ/JAB.OP19/PLANTATIONS/TANDAN KOSONG&KOMPOS; Date: 30/8/2019	Complied
4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.	Management documents including the Group Sustainability Policy available publicly via FGV’s website as following: <a href="http://www.fgvholdings.com/sustainability/sustainability-governance/sustainability-policies/">http://www.fgvholdings.com/sustainability/sustainability-governance/sustainability-policies/</a> .	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- <b>Major compliance</b> -	Other management documents including procedures, social and environmental management plan, available upon request at individual operating units including Keratong 3 POM.	
<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> -	The consultation and communication procedures were established as Procedure Communication, Participation and Consultation; Doc. # FPI/L2/QOSHE-6.0; Issue # 2; Issue date: 2/1/2008; Rev. 3; Rev. date: 29/11/2016 and Doc. # ML-1A/L2-Pr12(0); Rev. 0; Effective date: 1/6/2016.	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> -	Management official responsible nominated was Khairul Anuar Bin Mohammad Idris, General Clerk of Keratong 3 POM as per letter of appointment Ref. # (08)4028/Ktg3/840A/RSPO; Appointment as Communication and Social Leader Dated 1/6/2018.	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 were recorded in file E1.4.2 (Stakeholder) that has listed few categories of stakeholders including neighbours, internal stakeholders and external stakeholders.  Records of complaints and solutions for the recent stakeholder meeting conducted on 15/10/2019 was sighted.	Complied
<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.	FGVPISB adapting RSPO SCC for its MSP0 SCC. Procedure namely Standard Operating Procedure For Mill RSPO SCC; Doc. # FGPM-RSPO SCC; Issue # 3.0; Distribution date: 11/6/2018 was	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- <b>Major compliance</b> -	established by Certification & Due Diligence, Sustainability & Environmental of Felda Global Ventures Holding (FGVH) which covered responsibility, reporting of certified CPO/PK, non-conformance material, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint Communication and Claim.	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - <b>Major compliance</b> -	FGV have established systems to monitor the implementation of the traceability systems in the mill thorough Internal Audit conducted by the Plantation Sustainability Department. Latest Internal audit was conducted on 21-22/8/2019.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - <b>Minor compliance</b> -	Identified as Organization RSPO SCC Supervising System Committee.  Role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements was describe in the Procedure for Mill RSPO SCC; Doc. # FGPM-RSPO SCC (Mass Balance); Issue # 3.0; Distribution date: 11/6/2018.  The Mill Manager as a chairman for SCC committee at Keratong 3 POM assisted by 2 Assistant Mill Managers. Sighted the letter ref. # (08)4028/Ktg.3/840A/RSPO; Dated 1/6/2019 for appointment as Traceability Officer of Norasimah binti Jasman; a Weighbridge Clerk as the person in-charge of traceability.  The job descriptions were identified in the procedure accordingly.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel are maintained in various forms such as:	Complied

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	- Major compliance -	<ul style="list-style-type: none"> <li>- Mill daily, weekly &amp; monthly production reports</li> <li>- Mass Balance Worksheet – monthly inputs</li> <li>- Local Sales Delivery Advice (LSDA)</li> <li>- Incoming FFB Records</li> <li>- Outgoing CPO Records</li> <li>- Outgoing PK Records</li> <li>- Weighbridge tickets as per samples:               <ul style="list-style-type: none"> <li>• External FFB received weighbridge ticket #A00046333; Supplier: BKF Sdn. Bhd.; DO # 036196; Net weight: 6.28mt; Lorry #JLN4692</li> <li>• External FFB received weighbridge ticket #A00047991; Supplier: Eng Huat Latex Concentrate Sdn. Bhd.; DO # 245230; Net weight: 1.86mt; Lorry #JLX2911</li> </ul> </li> </ul>	
<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>- Major compliance -</p>	<p>FGVPISB has established SOP on track changes, monitoring, implementation and compliances of legal and other requirement. Refer doc. no ML-1A/L2-Pr6 (0) dated 1/6/2016.</p> <p>Plantation and Sustainability Department and Manager and Asst. Manager for respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement. To monitor the status of legal compliance, the management has appointed the Executive Assistant, Zaini Binti Rahimi, as per letter ref. # (07)4028/KTG3/840A/RSP0; Date: 1/11/2019.</p>	Complied

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	<ul style="list-style-type: none"> <li>• Employer shall provide particulars relevant to permit upon request by Labour Office from time to time</li> <li>• Permit shall be displayed on strategic location easy to be viewed by workers</li> <li>- Audiometric test conducted as sampled from memo from Mohammad Helmi Jaafar (Asst. Manager). 22/11/19 (7 employees), 29/11/19 (7 employees) sent to Klinik Syed Badaruddin in Kuantan. In 08/03/19, a total of 65 employees was sent for audiometric test as conducted by Specialist Mobile Safety Supplies Sdn Bhd.</li> <li>- Diesel tank permit from KPDNKK validity expired on 01/11/19. Application through BLESS system was made as evidence of renewal application dated 17/10/19 at 5.13pm. Still not received a new permit.</li> <li>- SDS for Chemicals such as Soda Ash (last reviewed 01/12/14), Aluminum Sulfate (last reviewed 20/11/15) and Aquachem (last reviewed 03/02/15). The revised copies obtained dated 13/04/18 for Aluminium Sulfate and 11/01/18 for Soda Ash. Both from Kong Long Huat Chemicals Sdn. Bhd.</li> <li>- Scheduled Waste SW305 (Used Oil) labelled and kept in the Scheduled Waste Store as sampled.</li> <li>- MPOB License No 500194604000 valid from 01/04/19-31/03/20 for selling and transport FFB, PK, CPO, SPO. Buying and transport FFB, PK, CPO. Storage of PK, CPO, CPO. Milling FFB. Allowed to process 259200 MT/Year FFB.</li> </ul>	

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<p><b>4.3.1.2</b></p> <p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>FGVPISB has established SOP on track changes, monitoring, implementation and compliances of legal and other requirement. Refer doc. no ML-1A/L2-Pr6 (0) dated 1/6/2016.</p> <p>All legal requirement was documented in Register of Legal and Other Requirements (Ref doc no ML-1A/L5-AP1 pind 0) and List of compliance license/permit/legal requirement.</p>	<p>Complied</p>
<p><b>4.3.1.3</b></p> <p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p><b>- Major compliance -</b></p>	<p>All legal requirement was documented in Register of Legal and Other Requirements (Ref doc no ML-1A/L5-AP1 pind 0) and List of compliance license/permit/legal requirement.</p> <p>Compliance to each applicable law and regulation is monitored by the operating units. The legal register at all sites were updated on a yearly basis / as and when needed for new updates/licenses. Sighted latest updated Register of Legal and Other Requirements; Form # FPI/QOHSE-2.1 Pind 0; Dated 23/1/2019 for Occupational Safety and health (Noise Exposure) Regulations 2019 was updated in the Register of Legal and Other Requirements (ML-1A/L5-AP24 Pind 0) dated 17/05/19.</p>	<p>Complied</p>
<p><b>4.3.1.4</b></p> <p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p><b>- Minor compliance -</b></p>	<p>Plantation and Sustainability Department and Manager and Asst. Manager for respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance. Plantation and Sustainability Department conducted Internal audit for Sustainability Certification to monitor the status of legal compliance. For Keratong 3 POM to monitor the status of legal compliance, the management has appointed the Zaini Binti</p>	<p>Complied</p>

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		Rahimi, Executive Assistant as per letter ref. # (07)4028/KTG3/840A/RSPO; Date: 1/11/2019.	
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. <b>- Major compliance -</b>	There is no land dispute in the certification unit and supply base at the time of audit. Verified the information through the land titles and during stakeholder’s consultation.	Complied
<b>4.3.2.2</b>	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>	Keratong 03 POM has the land title no: HSD 3693 Lot: PT 8122 (6.184 Ha for Kawasan Kilang Kelapa Sawit) valid until 25 Aug 2064. The conditions is to be used for Palm Oil Mill only. Sighted the quit rent voucher no 060902PN00009860 on 20.02.2019 for RM 12,372.00.	Complied
<b>4.3.2.3</b>	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. <b>- Major compliance -</b>	Area of Keratong 03 Palm Oil Mill was fully fenced and separated from others.	Complied
<b>4.3.2.4</b>	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 in the certification unit and supply base at the time of audit. Verified the information through the land titles and during stakeholder’s consultation.	Complied
<b>Criterion 4.3.3 – Customary rights</b>			

Criterion / Indicator		Assessment Findings	Compliance
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>	Procedure on land use rights -FPIC ML-1A/L2-Pr12(0) available but no customary land in this region and FGV has been the owner.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. <b>- Minor compliance -</b>	Map of mill and estate surrounding is available but no customary land around it in this region.	Complied
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 evidence of negotiation records as there is no customary land.	Complied
<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>	Social impact identified and plans were implemented in-line with document sighted as Laporan Penilaian Kesan Impak Sosial FGVPISB Kilang Sawit Keratong 3; Doc. # FGV/SCC-SIA; Rev. # 2; Effective date: 20/8/2019 by Sustainability Compliance and Certification Department (SCC), FGVH.	Complied
<b>Criterion 4.4.2: Complaints and grievances</b>			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. <b>- Major compliance -</b>	The system established as Procedure to Handle Complaints and Grievance; Doc. # ML-1A/L2-Pr13(0); Rev. # 0; Effective date: 1/6/2016. The procedure also specify measures ensuring anonymity of complainants and whistleblowers in case being	Complied

Criterion / Indicator		Assessment Findings	Compliance
		requested as per Whistleblowing Policy; Doc. # ML-1A/L1-Po18(0); Rev. 0; Effective date: 24/2/2015.	
<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> -	Complaints were acted on and replied with completion date and verified. Most of the complaints were related to house repair work such as broken fan or door recorded in Complaint Book and other complaints were recorded in Permohonan Membaiki Kerosakan Rumah. The management has taken action to rectify the problems. The complainants have acknowledged after the problems been rectified.	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> -	The information of the process by which a dispute was resolved with and its outcome were both to be documented in the Grievances/Complaints/Requests log book maintained by the Communication and Social Responsible Person (Management Official).	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> -	Awareness made through meeting as per internal stakeholder consultation meeting i.e. Sesi Perjumpaan Bersama Regional Controller; Date: 19/11/2019 and external stakeholder meeting latest conducted on 15/10/2019.	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 and solutions for the recent stakeholder meeting conducted on 15/10/2019 was sighted.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
<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>	The CSR budget is handled by central. The records for CSR carried out in 2019 as per sample contributions as following: - Donation to Masjid An-Nur Felda Keratong 3 program Maulidur Rasul; Date: 14/11/2019 - Lending of van transport for Sekolah Agama Rakyat Kafa (F) Keratong 3 study tour program; Date: 12/10/2019	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>	Safety and Health Policy from FGV signed by Dato Zakaria Arshad (Group President/CEO) dated 01/04/16. Consist of commitment to comply with legal requirements, managing HSE risk, continual improvement in HSE in meeting best practices. While in Sustainability Policy (FGV/SED/POL/001) dated 01/09/16 under 8.3 Safety and Health. FGV Group is committed to ensure safe and healthy work environment, prevention of incident, Complying with legal requirements.	Complied
<b>4.4.4.2</b>	The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:	During site visit sighted PPE provided by the employer not adequately used by employees exposed at high noise area as sighted 2 employees at boiler area, and overhead crane operator not wearing ear plugs and employee at workshop performing hotwork activity (welding) and contractor employee (Tinta Bumi Enterprise) doing welding on cage not wearing face shield to protect face and eye from potential injury.	Major noncompliance

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<ul style="list-style-type: none"> <li>ii. All employees involved are adequately trained on safe working practices;</li> <li>iii. All precautions attached to products should be properly observed and applied;</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 trust shall have knowledge and access to latest national regulations and collective agreements.</li> <li>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</li> <li>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</li> </ul>	<p>Available PPE issuance records 2018 &amp; 2019 for all employees as sampled for Lab Assistant (Sofi b. Hassan): Gloves (12/03/18), Safety Shoe (14/04/18), Ear Plug (14/04/18), Glove (01/04/19). Aszeli b. Mohamad Supian (Foreman) receiving Safety Shoe (10/04/18), Glove (10/10/18), Safety Shoe (18/06/19) and Glove (09/10/19).</p> <p>First Aid Training was conducted on 03/04/19 at assembly Area and attended by all employees. First aid boxes are located at Workshop, Boiler Area, Office, Lab, Supervisor Room as map of First aid Box established.</p> <p>Training certificate for first aider valid from 20/12/17 till 11/10/20 from Malaysian Red Crescent (PBSM) to Roslie b. Isa, Firdaus b. Che Rashid, Mohd Roslan b. Ahmad and Mohd Rizat b. Kassim.</p> <p>Available OSH SOP covering Work Permit (FPI-PK-067), Fire Incident (FPI-PK-069), LOTO (FPI-PK-060), Forklift Operation (FPI-PK-113), Schedule Waste management (FPI-PK-106), Chemical Management (FPI-PK-036), Working at Height (FPI-PK-040</p> <p>Fire Drill was conducted on 03/04/19 at Assembly Area at 08.00 am. As recorded 84 employees involved.</p> <p>JKKP 8 was submitted to JKKP on 16/01/19 by Mill Manager.</p> <p>Based from accident reported on 04/11/19 at main ash conveyor station boiler. Victim was Aszeli Muhammad (Foreman) worked for 35 years. Unsafe act where no guarding of conveyor chain, LOTO not practices. Testing of chain tension using hand was the main cause of the accident. Medical leave for 57 days. JKKP 6 was sent</p>	

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	i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite. j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. <b>- Major compliance -</b>	to DOSH on 06/11/19. Action was taken to improved the situation as reported to DOSH.  CHRA assessment have been conducted on 9 April 2015 by Ihsan Sharif (JKKP HIE 127/171-2(85))  The management has conducted a regular OSH meeting 3 monthly basis as per OSH Act 1996, Osh Meeting latest have been conducted on 30/08/19. The coming meeting was scheduled as memo issued signed by Azlie Shaftrie b. Shaari (Manager). Meeting will be conducted on 09/12/19. Among agenda to discuss outstanding issues from previous meeting, OSH performance, Accident report, Complaint and grievances, legal compliance, Osh training and other matters.	
<b>Criterion 4.4.5:</b> Employment conditions			
<b>4.4.5.1</b>	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. <b>- Major compliance -</b>	FGV Palm Industries Sdn. Bhd. has developed a Group Sustainability Policy, Clause 8.7 Human Rights (FGV/SED/POL/001, Dated 24/8/2017; Revision: 0.0) specifying that FGV is committed and support human rights.  Latest briefing of the policy was conducted on 2/9/2017 at the mill. The policy also was publicly displayed at the office area.	Complied
<b>4.4.5.2</b>	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.	FGV Palm Industries Sdn Bhd has Group Sustainability Policy, Doc No: FGV/SED/POL/001 dated 24/08/2017 under 8.9 Responsible Employment. FGV Group also firmly supports the provision of equal opportunity to all and shall seek to ensure that all employees and applicants for employment should receive fair treatment and shall	Complied



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	- <b>Major compliance</b> -	not engage in or support discrimination based on race, nationality, religion, disability, gender, age, sexual orientation, union membership or political affiliation.	
<b>4.4.5.3</b>	<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>Employment Process Based on Procedure of Recruitment &amp; Selection SOP; SOP # FGV/GHR/SOP/004; Rev. # 2.0; Effective date: 13/6/2018.</p> <p>All work agreements were according to the Perjanjian Bersama Antara FGV Palm Industries Sdn. Bhd. Dengan Kesatuan Pekerja-Pekerja FGV Palm Industries Sdn. Bhd. Semenanjung; 1/1/2019 – 31/12/2021, The Collective Agreement was received by the mill to replace the previous agreement Ref. # COG 016/2016 which was expired on 31/12/2018. Documentation of pay and conditions sighted available as per following samples:</p> <ul style="list-style-type: none"> <li>- Employee # 1209030; Work station: General worker; Date joined: 1/10/2010; Nationality: Malaysia</li> <li>- Employee # 1207229; Work station: Boiler House Chargeman; Date joined: 18/3/2003 Nationality: Malaysia</li> <li>- Employee # 1211172; Work station: General worker; Date joined: 1/11/2016; Nationality: Malaysia</li> <li>- Employee # 1201979; Work station: Lab Supervisor; Nationality: Malaysia</li> <li>- Employee # 1201042; Work station: General Clerk; Date joined: 1/8/1985; Nationality: Malaysia</li> </ul>	Complied
<b>4.4.5.4</b>	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.	As documented in FGV Holdings Berhad Group Sustainability Policy, Doc. No.: FGV/SED/POL/001, Rev 3, effective date: 29.05.2019, Chapter 5.1.3.1 – Respect for Human Rights. FGV has defined hiring of workers is 18 and above due to the nature of work.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- <b>Minor compliance</b> -	Sighted the contractors for Keratong 11 Estate = Perniagaan Maju Bera & MFM Afdhal Enterprise.	
<b>4.4.5.5</b>	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.  - <b>Major compliance</b> -	Information provided in the list of staff/employees (Maklumat Kakitangan/Petugas) Keratong 3 Palm Oil Mill which contained the full names, position, employee number, position grade and date of employment/attachment to Keratong 2 POM. No information on gender and date of birth on the list.	Complied
<b>4.4.5.6</b>	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.  - <b>Major compliance</b> -	All the employment contract on the sampled workers as per 4.4.5.3 are sighted and available during the audit and signed by workers.	Complied
<b>4.4.5.7</b>	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.  - <b>Major compliance</b> -	The overtime is recorded in the punch card system and paid accordingly. Seen all the employees' punch cards with the form titled 'Permohonan Kebenaran Kerja Lebih masa' filled up by workers for the overtime. Seen the overtime record for office workers while no overtime offer to the general workers.	Complied
<b>4.4.5.8</b>	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.	As per employment contract, the working hour is 8 hours/day. Seen all the employees' punch cards with the form titled 'Permohonan Kebenaran Kerja Lebih masa' filled up by workers for the overtime. Seen the overtime record for office workers while no overtime offer to the general workers.	Complied

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	- 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 -	The payslip and the inputs were reviewed to confirm the wages and overtime is in line with legal requirements of Employment Act 1955 and worker's employment contract. Verified the approval on the 'Rumusan Laporan Kelulusan dan Bayaran Tuntutan Kerja Lebih Masa.	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. - Minor compliance -	Water and electricity subsidy, group productivity incentive for the harvesters, school bus, safe box for passport with key, death benefit for deceased family members, health benefit at clinics.	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. - Major compliance -	Workers' line site inspection conducted in weekly basis as per record 'Checklist Kawasan Perumahan Kilang Sawit Keratong 3'. Since the workers in mill are all locals, they live in the Felda settler's neighborhood.	Complied
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Group Sustainability Policy (clause 5.1.3.7) on discrimination against women and explained refresher on 5/10/19 to all employees. Procedure on Women Committee (ML-1A/L2-Pr1.4 (0) dated 01/06/16.	Complied
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and	Freedom to join trade union and worker's representative is covered in policy (5.1.3.5). Employee gives consent to join trade union. Sighted the minutes of meeting between the mill management and	Complied

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	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>the committee members of Felda Palm Industries Workers' Union is available. The meetings were held on 28 June 2019 (Mesyuarat Agong Tiga Tahunan Kali Ke 5 Sesi 2019-2022) for Keratong POM and the minute meeting of Worker's Committee was conducted on 04/05/2019 attended by 8 people (01/2019) for year 2019 and 04/12/2019 attended by 8 people. The person in charge (chairman) for Worker's Committee in Keratong 03 POM is Mr. Mohamad Akhyar (Assistant Engineer) as per appointment letter dated 01/10/2019 (Bil: (01)4028/Krt.3/810).</p>	
<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.</p> <p><b>- Major compliance -</b></p>	<p>Group Sustainability Policy clause 5.1.3.2 covers minimum age to follow the local legislation and no young person allowed to be employed. Name list of employees was sighted and the youngest employed worker is 19 years old.</p> <p>During stakeholders' consultation of contractor and workers, they are clear that minimum age of work by law is 18 years old.</p>	Complied
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	<p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p><b>- Major compliance -</b></p>	<p>Training Plan 2019 was established as sampled for Keratong 03 Palm Oil Mill (FPI/L4/QOHSE-5.1 Pind 0) approved by Mill Manger dated 02/01/19. Among training plan for Jan-Dec 2019 included QHSE Awareness (Jan), Mill Operation (Jan-Dec), QHSE for Contractor (Once), ERP Drill (Apr), Log Out Tag Out (Feb), First Aid (Apr) and etc.</p>	Complied
<b>4.4.6.2</b>	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in</p>	<p>Available a Training Needs 2019 consist of all level of employees at Keratong 03 Palm Oil Mill as sampled to provide the specific skill</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	order to provide the specific skill and competency required to all employees based on their job description. <b>- Major compliance -</b>	and competency required to all employees based on their job description	
<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>	Evidence of training for Keratong 03 Palm Oil Mill as verified in 2019: <ul style="list-style-type: none"> <li>• Safety Briefing for STR Station and Bobcat was conducted on 17/08/19 attended by 11 employees.</li> <li>• Safety Work and LOTO Operation was conducted on 12/07/19 attended by 12 employees.</li> <li>• HCV (Biodiversity) Training was conducted on 10/05/19 attended by 83 employees.</li> <li>• Contractor Safety Training was conducted on 21/03/19 an attended by 9 contractor’s representative.</li> <li>• Chemical Handling Training was conducted on 26/02/19 and attended by 7 employees.</li> <li>• VORSEP Training (For Boiler Operator) was conducted on 18/01/19 and attended by 8 employees.</li> </ul>	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	An environmental policy was available as part of FGV Holdings Berhad established Group Sustainability Policy; signed by the	Complied

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	established, effectively communicated and implemented. <b>- Major compliance -</b>	Chairman, Board of Directors; Datuk Wira Azhar Abdul Hamid; Approved date: 29/5/2019; Policy # FGV/SED/POL/001; Rev. 3; Effective date: 29/5/2019.	
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations <b>- Major compliance -</b>	Environmental aspect and impact assessment was conducted as verified from Identification of Environmental Aspects and Evaluation of Significance Form (FPI/QOHSE-1.7 Pindaan 0) last updated on 13/02/19 covering activities such as main entrance, housing, office, canteen, weight bridge, loading ramp, operation (Threshing, pressing, press, depericarper), lab and etc.	Complied
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. <b>- Major compliance -</b>	Environmental Improvement Plan was established and implemented as sampled based on significant environmental impacts which including the potential land and water contamination from the use of chemical and handling of the empty chemical container, chemical storage as well as diesel storage. Continuous implementation of management action plan sighted for control of significant impact including proper handling of scheduled waste, practices of 3R.	Complied
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. <b>- Minor compliance -</b>	As sampled in Keratong 03 Palm Oil Mill, the programme to promote positive impact to environment is available under title <i>Borang Program Pengurusan Kualiti Alam Sekitar</i> (FPI/L4/QOHSE-3.2 Pind 1)	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.	Based on evidences of training records found few training and briefing was conducted to create awareness and support of employees such as:	Complied

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	- Major compliance -	<ul style="list-style-type: none"> <li>Briefing on Recycling Policy, No open burning was conducted on 18/10/19 attended by employees.</li> <li>Briefing on Environmental Protection was conducted on 16/08/19 attended by all employees.</li> <li>Briefing VORSEP for boiler operator was conducted on 18/01/19.</li> </ul>	
4.5.1.6	<p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>Environmental meeting was conducted on 29/05/19 for year 2019 which attended by 10 management and staff such as Azlie Shafitrie b. Shaari (Manager), Mohd Arif Azizi b. Rosle (Sec), Muhammad Helmi b. Jaafar, Sopi b. Hassan, Aszeli b. Supian, Mazlan b. Abdullah and 4 others. Among issues discussed covering compliance status of mill, action plan to manage environmental issues. The meeting to discuss environmental quality to be enhanced further considering more issues and more regularly conducted to establish better commitment on environment.</p>	OFI
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>			
4.5.2.1	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within 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</p> <p>- Major compliance -</p>	<p>The baseline for diesel was established as verified in Diesel Consumption report 2019 covering Engine room, Prime mover, Shovel, water pump and others. Also available another document with detail list of diesel consumption equipment and machinery recorded in Daily Diesel Consumption (Monthly basis).</p>	Complied

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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 consumption of non-renewable energy such as diesel are been monitored in Keratong 3 POM, the record is available under title "Diesel Consumption Tahun 2019". Latest record is on November 2019 total diesel consumption as recorded was 6,258.00 Litres.</p> <p>The electricity consumption was recorded on daily basis. This need to be improved further to established summary of consumption on monthly basis for easy monitoring.</p>	OFI
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p><b>- Minor compliance -</b></p>	In Keratong 3 POM, turbine is using to generate the electric for operation	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>	All types of wastes and sources of waste identified and documented in the Waste Management Plan 2019. Among type of waste identified including Mesocarp Fibre, EFB, Shell, POME, SW and domestic waste.	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>a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p><b>- Major compliance -</b></p>	Waste Management Plan 2019 for Keratong 03 Palm Oil Mill covering waste such as from operation and mill and Office and housing.	Complied



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<p><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</p> <p>- <b>Major compliance</b> -</p>	<p>Observed at Workshop that generated contaminated waste to be controlled and managed with clearly marked temporary bins for contaminated gloves, rags, empty spray/grease/oils containers/cans.</p> <p>Sampled at Scheduled Waste Store under Roslan Ahmad (Assistant Store Clerk) found Scheduled Waste SW305 (Used Oil) generated with application to dispose was applied dated 04/12/19 to Kualiti Alam. The labelling was posted SW305 and all used oil transferred into the store.</p>	<p>OFI</p>
<p><b>4.5.3.4</b> Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p>- <b>Minor compliance</b> -</p>	<p>Domestic waste from Keratong 03 Palm Oil Mill disposed by engaging contractor (Tinta Bumi Enterprise) 2 times a week (Sunday and Wednesday).</p>	<p>Complied</p>
<p><b>Criterion 4.5.4:</b> Reduction of pollution and emission</p>		
<p><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.</p> <p>- <b>Major compliance</b> -</p>	<p>Monitoring of the GHG quantity was done through PalmGHG calculator, where annual quantification of all GHG sources was input into the calculator. Default values of emissions factor Calculation of the GHG emissions were derived from publicly available sources including IPCC. The latest GHG assessment using data in 2018.</p>	<p>Complied</p>
<p><b>4.5.4.2</b> An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- <b>Major compliance</b> -</p>	<p>Available Diesel Reduction of Pollution Plan 2019. Among activity stated are:</p> <ul style="list-style-type: none"> <li>- Recording the daily diesel consumption.</li> <li>- Use of turbine for replacing diesel for genset.</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>- Training of related employees.</li> <li>- Available GHG Emission Reduction Plan 2019 established from diesel consumption, usage of chemicals and organic waste (domestic) with clear designated person incharged and status of action.</li> </ul>	
<b>4.5.4.3</b>	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p><b>- Major compliance -</b></p>	<p>From the Jadual Pematuhan record under license 004369. KS Keratong 3 have licence to release effluent to Sg Keratong within the limit and stated as compliance. Another sampling on 12/11/19 recorded result compliance.</p> <p>Sampling was conducted by FGV Palm Industries Sdn Bhd by ChM. Asma Wan Mohd Sham.</p> <p>Every 3 months required to submit to DOE Jadual Pematuhan (Lampiran F) As sampled submission dated 20/08/19 showing compliance to all 47 terms stated. The current submission is under preparation to be sent to DOE. Prepared Sofi b. Hassan (Lab).</p>	Complied
<b>Criterion 4.5.5: Natural water resources</b>			
<b>4.5.5.1</b>	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> <li>a) Assessment of water usage and sources.</li> <li>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</li> </ul>	<p>Water management plan 2018 is available under file E2 Alam Sekitar. The plan included identifying source of water from river, the impact to water catchment area and stakeholders, Issues related to water such as contamination, shortage, changing in water quality, clogged, heavy rain and flood and etc. Related action plan was established with clear designated responsibility and dateline.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p><b>- Major compliance -</b></p>		
<b>4.5.5.2</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>Final discharge through <i>Alur Air</i> required under Compliance Schedule (Jadual Pematuhan) for License No. 004369 valid from 01/07/19-30/06/20.</p>	Complied
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Mill Management</b>			
<b>4.6.1.1</b>	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>As sampled from Folder of Operating manual of POM available a Masterlist revised 23/10/17. Approved by Vice President, Planning, Operation, Budgeting &amp; Technical FGVP. A total of 141 SOPs. Among SOPs are:</p> <ul style="list-style-type: none"> <li>- Management of Entrance</li> <li>- Control of Products</li> <li>- Loading</li> <li>- Grading of FFB</li> <li>- Conveyor Handling</li> <li>- And etc.</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.6.1.2	All palm oil mills shall implement best practices. - <b>Major compliance</b> -	The best practice was implemented as per verified during site verification and followed as per Troubleshooting guide and also operation manual for Mill (FPI/L3/15) dated 17 Nov 2017 prepared by HQ.	Complied
<b>Criterion 4.6.2:</b> Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - <b>Major compliance</b> -	Available Budget for 2019 for Keratong 03 Palm Oil Mill consist of business management plan. Number of Employees (84), FFB processed (235,440 MT), OER (21.41), Revenue from products and other income. Details of expenses were clearly stated and	Complied
<b>Criterion 4.6.3:</b> Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - <b>Major compliance</b> -	Pricing mechanism with historical price records were kept at Jabatan Belian BTS (FFB Purchase Department) FGV HQ. Sighted sample pricing for offered FFB supplier: BKF Sdn. Bhd.; Letter of FFB Purchase Extension Offer Ref. # (28)FGVPISB/FFBPD/8824; Date: March 2019. Sighted the sample explanation done to suppliers among settlers via meeting with mill management i.e. <i>Mesyuarat Jawatankuasa Permuafakatan Produktiviti dan Kualiti</i> (Quality and Productivity Coordination Committee Meeting); Meeting # 07/2019; Date: 29/8/2019; Venue: Wisma JKRR Felda Keratong 4.	Complied
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> -	FFB purchased contracts were kept by Jabatan Belian BTS (FFB Purchase Department) FGV HQ. The mill issued the monthly FFB (External) Payment Statement Report as well as Supplier Payment	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Data Interface Report for agreed payments as per following sample:</p> <ul style="list-style-type: none"> <li>- Supplier: BKF Sdn. Bhd.; Invoice # 12269; Payment ref. # 40281912269; Date: 13/9/2019</li> <li>- Supplier: Eng Huat Latex Concentrate Sdn. Bhd.; Invoice # 12271; Payment ref. # 40281912271; Date: 13/9/2019</li> </ul>	
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	<p>In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.</p> <p><b>- Major compliance -</b></p>	<p>Information related to MSPO requirements provided to contractors in the form of letter of agreement (Surat Persetujuan E6.4.1) as the method to made contractors understand. Sighted few samples of signed form as per following:</p> <ul style="list-style-type: none"> <li>- Contractor: Sinar Firdaus Jay; Signed date: 10/1/2019</li> <li>- Contractor: Kejuruteraan Syazak; Signed date: 7/1/2019</li> <li>- Contractor: Syarikat Perniagaan Haji Yusof; Signed date: 13/9/2018</li> </ul>	Complied
<b>4.6.4.2</b>	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p><b>- Major compliance -</b></p>	<p>Evidence provided based on the sample contractor engagement as per following purchase order:</p> <ul style="list-style-type: none"> <li>- Surat Perintah Kerja (SPK) # 3301323752/1300988621; Date: 30/11/2018; Contractor: Tinta Bumi Enterprise; Work awarded: Collection and Disposal of Domestic Waste 2019; Contract period: 1/1/2019 – 31/12/2019</li> <li>- Surat Perintah Kerja (SPK) # 3301323746/1300988615; Date: 30/11/2018; Contractor: Mohd. Nur Aliff Bin Kidam; Work</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		awarded: Mill Compound Grass Cutting and Spraying; Contract period: 1/1/2019 – 31/12/2019	
<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>	FGVPISB Keratong 3 POM agreed for BSI auditors to verify the assessment through a physical inspection if required.	Complied

**Appendix B: List of Stakeholders Contacted**

<p><b>Government Officer:</b> Tabika Kemas</p>	<p><b>Community/neighbouring village:</b> Far-East Holdings Berhad - Ladang OSK (Neighbour) Ketua Kampung Felda Keratong 7</p>
<p><b>Suppliers/Contractors/Vendors:</b> Keratong Industrial Supply</p>	<p><b>Worker’s Representative/Gender Committee:</b> Field workers Mill workers NUPW representative Pengerusi KKD Keratong 3 General workers</p>

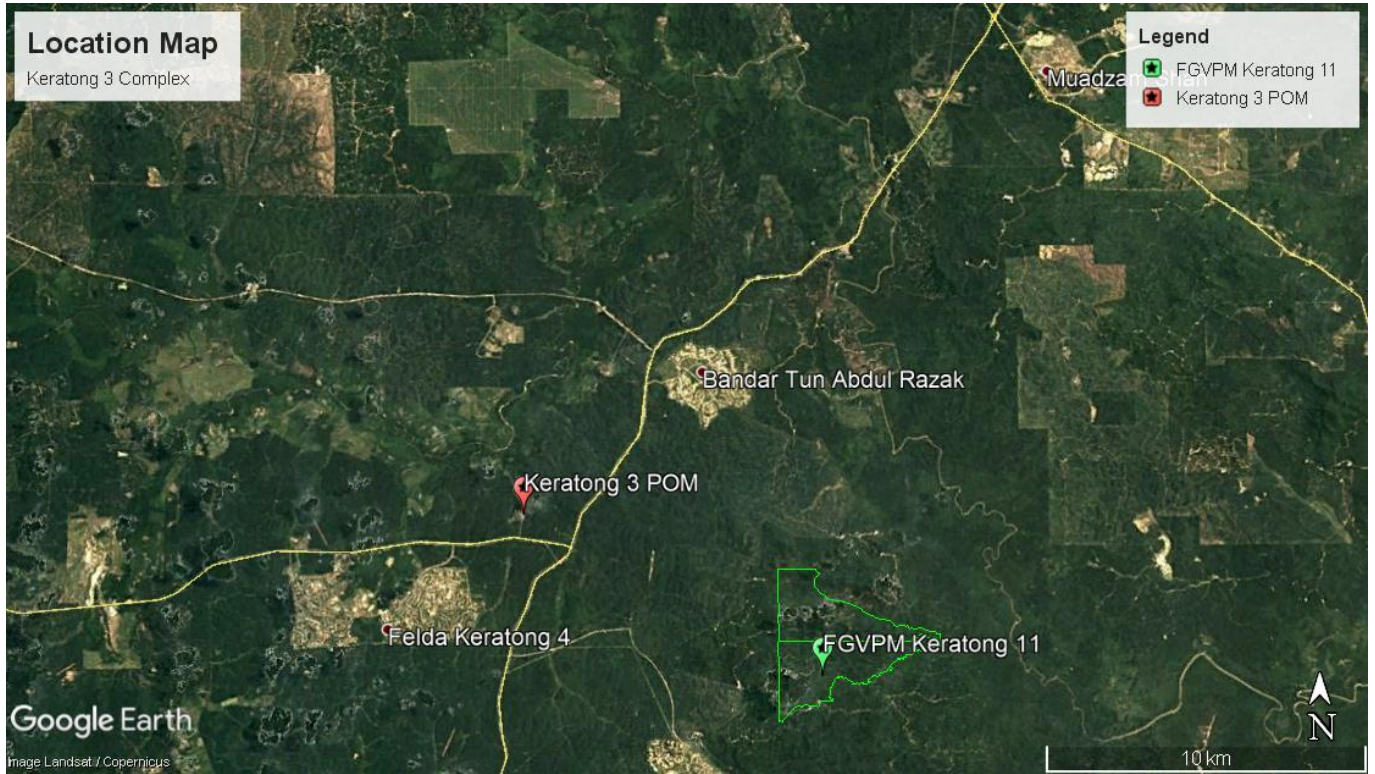
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**Appendix C: Smallholder Member Details**

No.	Smallholder		Location of Planted Area (District)	GPS Coordinates	Certified Area (ha)	Planted Area (ha)
	Name	MPOB License Number				
	n/a					

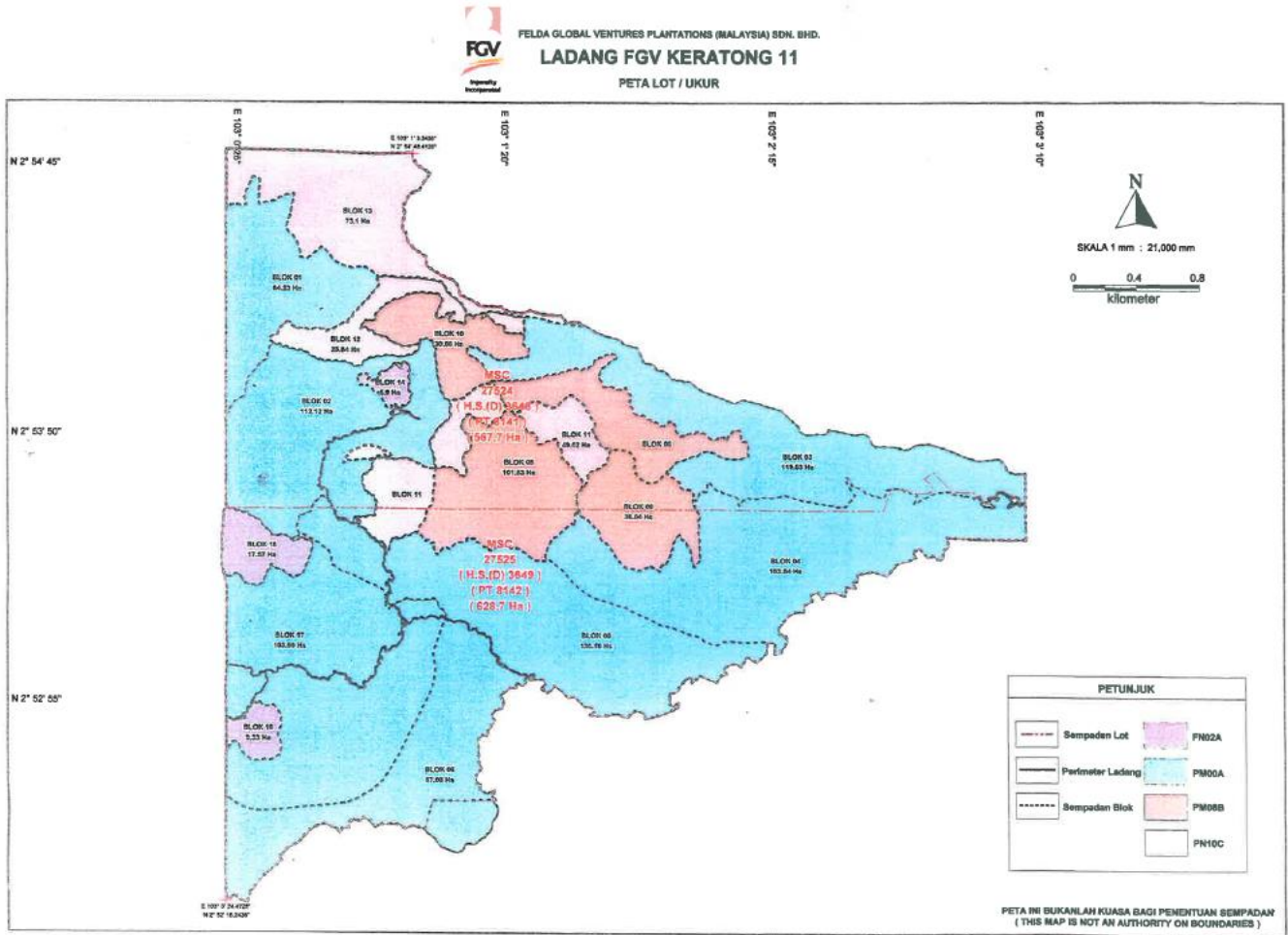


**Appendix D: Location and Field Map**



FGVPISB Keratong 3 POM Location

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FGVPM Keratong 11 Estate Field Map

**Appendix E: List of Abbreviations**

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