

**MALAYSIAN SUSTAINABLE PALM OIL
- ANNUAL SURVEILLANCE ASSESSMENT (ASA1_1)
PUBLIC SUMMARY REPORT**

Genting Oil Mills (Sabah) Sdn Bhd
Client company Address: 10 th Floor, Wisma Genting Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
Certification Unit: Genting Oil Mills (Sabah) Sdn Bhd-Genting Sabapalm Oil Mill Location of Certification Unit: KM 25, Down Sg. Labuk, Mukim Tagas-Tagas 90000 Beluran, Sandakan Sabah, Malaysia

Report prepared by:
Muhamad Naquiddin Mazeli (Lead Auditor)

Report Number:
3091775

Assessment Conducted by:
BSI Services Malaysia,
(DSM Accreditation Number: MSPO 09112018 CB 12)
Suite 29.01 Level 29 The Gardens North Tower,
Mid Valley City Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia
Tel +60392129638 Fax +60392129639
www.bsigroup.com

TABLE OF CONTENTS

Page No

Section 1: Executive Summary	3
1.1 Organizational Information and Contact Person	3
1.2 Certification Information.....	3
1.3 Location of Certification Unit.....	4
1.4 Certified Area	4
1.5 Plantings & Cycle	4
1.6 Certified Tonnage of FFB	4
1.7 Uncertified Tonnage of FFB.....	5
1.8 Certified Tonnage	5
1.9 Actual Sold Volume (CPO).....	5
1.10 Actual Sold Volume (PK).....	5
Section 2: Assessment Process	6
2.1 BSI Assessment Team.....	7
2.2 Assessment Plan	8
Section 3: Assessment Findings	10
3.1 Details of audit results	10
3.2 Details of Nonconformities and Opportunity for improvement.....	10
3.3 Status of Nonconformities Previously Identified and OFI	17
3.4 Summary of the Nonconformities and Status.....	22
3.5 Issues Raised by Stakeholders	23
Section 4: Assessment Conclusion and Recommendation	24
Appendix A: Summary of the findings by Principles and Criteria.....	25
Appendix B: List of Stakeholders Contacted	97
Appendix C: Smallholder Member Details.....	98
Appendix D: Location and Field Map.....	99
Appendix E: List of Abbreviations.....	100

Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	Genting Oil Mills (Sabah) Sdn Bhd		
Mill/Estate	MPOB License No.	Expiry Date	
	Mill: 500002804000	31/10/2020	
	Estate: 523495002000	30/09/2020	
Address	Genting Sabapalm Oil Mill, KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia		
Certification Unit	Genting Oil Mills (Sabah) Sdn Bhd- Genting Sabapalm Oil Mill		
Contact Person Name	Mr. Arunan Kandasamy, Senior Vice President - Plantations		
Website	www.gentingplantations.com	E-mail	arunan.kandasamy@genting.com
Telephone	089 265921 / 019 4904049	Facsimile	-

1.2 Certification Information			
Certificate Number	Mill - MSPO 689067 Estate - MSPO 689068		
Issue Date	04/07/2019	Expiry date	03/07/2024
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Standard	MS 2530: Part 3 and MS 2530: Part 4		
Stage 1 Date	N/A - The site is RSPO Certified		
Recertification Assessment Visit Date (RAV)	13-15/03/2019		
Continuous Assessment Visit Date (CAV) 1	09-10/07/2020		
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 653477	RSPO Principle and Criteria for sustainable palm oil production:2013; Malaysian National Interpretation:2014; RSPO Supply Chain Certification June 2017 for CPO Mill (Module E: Mass Balance)	BSI Services Malaysia Sdn. Bhd.	08/06/2021

MSPO 716641	MSPO SCCS	BSI Services Malaysia Sdn. Bhd.	07/10/2024
-------------	-----------	---------------------------------	------------

1.3 Location of Certification Unit

Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Longitude	Latitude
Genting Sabapalm Oil Mill	KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia	117.373482	5.963617
Genting Sabapalm Estate	KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia	117.373482	5.963617

1.4 Certified Area

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

1.5 Plantings & Cycle

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Sabapalm Estate	409.18	791.79	1867.61	688.60	199.76	3,547.76	409.18
Total (ha)	409.18	791.79	1867.61	688.60	199.76	3,547.76	409.18

1.6 Certified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Aug 2019 - Jul 2020)	Actual (Aug 2019 - Jun 2020)	Forecast (Aug 2019 - Jul 2020)
Genting Sabapalm Estate	96,482	71,120.69	93,240.00
Total	96,482	71,120.69	93,240.00

MSPO Public Summary Report
Revision 1 (Feb 2020)

1.7 Uncertified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Aug 2019 - Jul 2020)	Actual (Aug 2019 - Jun 2020)	Forecast (Aug 2019 - Jul 2020)
Smallholder	34,713.00	31,694.43	23,900
Total	34,713.00	31,694.43	23,900

1.8 Certified Tonnage			
Mill Capacity: 20 MT/hr	Estimated (Aug 2019 - Jul 2020)	Actual (Aug 2019 - Jun 2020)	Forecast (Aug 2019 - Jul 2020)
	FFB	FFB	FFB
	96,482	71,120.69	93,240.00
SCC Model: MB	CPO (OER:21.91 %)	CPO (OER: 25.66%)	CPO (OER: 21.86%)
	21,139.39	18,251.23	20,382.00
	PK (KER:4.17 %)	PK (KER: 4.74%)	PK (KER: 4.16%)
	4,020.62	3,372.002	3,876.00

1.9 Actual Sold Volume (CPO)					
CPO (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
18,251.23	-	14,956.24	2,898.89	327.71	18,182.84

1.10 Actual Sold Volume (PK)					
PK (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
3,372.002	-	-	3,225.21	0	3,225.21

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 09-10/07/2020. The audit programme is included as Section 2.2. The approach to the audit was to treat the Genting Sabapalm and Supply Base 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 and MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The estates or smallholders sample were determined based on formula $S = r\sqrt{n}$ 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.

MSPO Public Summary Report
Revision 1 (Feb 2020)

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)
Genting Sabapalm Oil Mill	√	√	√	√	√
Genting Sabapalm Estate	√	√	√	√	√

Tentative Date of Next Visit: March 22, 2021 - March 26, 2021

Total No. of Mandays: 4 mandays

2.1 BSI Assessment Team

Team Member Name	Role (Team Leader or Team member)	Qualifications (Short description of the team members)
Muhamad Naquiuddin Mazeli	Team Leader	He graduated with Bachelor of Science Horticulture at University Putra Malaysia. He started his career in 2009 as Researcher at Sime Darby Research Seed Centre and manage for Quality control for seed production for paddy, chilli and corn with collaboration with Malaysian Agricultural Research and Development Institute (MARDI) for 4 years. During the period, he was also involved with Nestle project on Red Rice production. He later joins the Sime Darby Plantation Berhad Sustainability Team in 2013 as Sustainability Executive. Joining the sustainability team, he managed, implemented and monitored the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training and internal audits related to RSPO, MSPO and other certifications where applicable to the operations within Sime Darby Plantation. He is a trained Safety Officer and he managed the Occupation Safety and Health of Northern Region Sime Darby Plantation Berhad operations. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental & biodiversity, agriculture best practices and workers consultation.
Rahayu Zulkifli	Team Member	Rahayu graduated with a Law Degree from John Moores University, Liverpool, United Kingdom in 1988. She was a practising lawyer before she joined several public listed companies as Head of Legal Department. In 2003 she joined an environmental NGO as a turtle conservationist, and in 2014 joined RSPO as Dispute Settlement Facility Manager. Rahayu is now a freelance auditor specializing in social aspects of the RSPO and MSPO standards, with audit experiences in Malaysia, Indonesia and Ghana. Rahayu successfully attended the RSPO-endorsed Lead Auditor course in 2014, ISO 14001 Lead Auditor course in 2016, the MSPO Awareness

MSPO Public Summary Report
Revision 1 (Feb 2020)

		Training in 2016, and RSPO-endorsed Lead Auditor Refresher course in 2018. Additionally, Rahayu also assists in HCV assessments (in particular HCV 5 & 6), as well as carry out Social Impact Assessments. Rahayu is also a trained and certified Mediator. During this assessment, she assessed on the aspects of legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English.
--	--	--

2.2 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	MNM	RHZ
Sunday 05/07/2020		RHZ & MNM travel from KUL to SDK, ETA 1800 via AK 5194 and check in at a hotel in Sandakan.	√	√
Thursday 09/07/2020	0800-0830 0830-0900	Opening Meeting MSPO: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan.	√	√
	0900-1230	Genting Sabapalm POM Inspection: FFB receiving, warehouse, workshop, waste management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√
	1230-1330	Lunch	√	√
	1330-1630	Document review (MS:2530 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,	√	√
	1630-1700	Interim Closing briefing	√	√
Friday 10/07/2020	0830–1230	Genting Sabapalm Estate 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.	√	√
	1230–1330	Lunch	√	√

Date	Time	Subjects	MNM	RHZ
	1330–1600	Document review (MS:2530 Part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices, P7: Development of New Planting	✓	✓
	1600-1700	Interim Closing briefing	✓	✓
		Finalization of audit findings & preparation of closing meeting	✓	✓
	1700-1730	Closing meeting	✓	✓

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 Six (6) Major nonconformities raised and One (1) Opportunity for improvement. The Genting Sabapalm POM and Supply base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Major Nonconformities:		
Ref: 1932021-202007-M1	Area/Process: Genting Sabapalm Estate	Clause: Part 3; 4.2.2.3
	Issue Date: 10/7/2020	Due Date: Close on 5/10/2020
Requirements:	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.	
Statement of Nonconformity:	Stakeholders lists are incomplete and not updated.	
Objective Evidence:	<ol style="list-style-type: none"> 1. Timbalan Pengarah Pegawai Imigresen, AG Mohd Yusof, who was named as the nominated representative of the Sandakan Immigration Office has retired, and this change has not been updated in the Stakeholder Lists. 2. GSPE employs 391 Indonesian and 2 Philippines workers. However, the Indonesian Consulate in Kota Kinabalu and the Philippines Embassy in Kuala Lumpur are not listed as stakeholders. 	
Corrections:	To update the stakeholder list accordingly to include latest Timbalan Pengarah Pegawai Imigresen, Indonesian Consulate in Kota Kinabalu and the Philippines Embassy in Kuala Lumpur.	
Root cause analysis:	<ol style="list-style-type: none"> 1. Changes on the Immigration Dept director was not inform by HR-GPOS to the OU's, because OUs has no direct contact/deal with the Immigration Dept since any issue related to this department is handled by HRAD at GPOS. 2. The Indonesia Konsulat Jeneral in Kota Kinabalu and Philippines Embassy in Kuala Lumpur was not included in the GSOM and GSPE stakeholder list because Sustainability Department Sabah misunderstood that they are irrelevant since GSOM and GSPE have no direct contact with them. 	

MSPO Public Summary Report
Revision 1 (Feb 2020)

Corrective Actions:	<p>OUs shall update and verify the stakeholder list at least once a year at least once a year and/or before the internal sustainability audit and external certification audits – as per Social Management Procedure SMP-GPB-32, clause 6.2</p> <p>To update the social procedure to include the job responsibility of HR department to notify Operating unit of any changes.</p>
Assessment Conclusion:	<p>As per latest stakeholder list dated June 2020, already included the Consulate of Indonesia and Embassy of Philippine. The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment.</p>

Major Nonconformities:																																			
Ref: 1932021-202007-M2	Area/Process: Genting Sabapalm Estate		Clause: Part 3; 4.4.5.3																																
	Issue Date: 10/7/2020		Due Date: Close on 5/10/2020																																
Requirements:	<p>Management shall ensure that employees’ pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p>																																		
Statement of Nonconformity:	<p>Workers’ salary deductions were made without complying with the condition imposed by the Sabah Labour Office.</p>																																		
Objective Evidence:	<p>Salary deductions for the following GSPE workers were made without complying with paragraph 2.2 of the Permit issued by the Sabah Labour Office dated 31 December 2019 (Serial No. 600-1/2/8/229 (11/SDK/2019-0339). Paragraph 2.2. requires that a written consent from the workers to be obtained for the salary deductions. However, for the following workers, no written consent was obtained:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Estate Workers’ No</th> <th style="text-align: center;">Month/Year</th> <th style="text-align: center;">Travelling documents (RM)</th> <th style="text-align: center;">Electricity (RM)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">E10936</td> <td style="text-align: center;">May 2020</td> <td style="text-align: center;">-</td> <td style="text-align: center;">8.35</td> </tr> <tr> <td style="text-align: center;">E00813</td> <td style="text-align: center;">May 2020</td> <td style="text-align: center;">-</td> <td style="text-align: center;">51.50</td> </tr> <tr> <td style="text-align: center;">E10155</td> <td style="text-align: center;">Jan 2020</td> <td style="text-align: center;">200</td> <td style="text-align: center;">-</td> </tr> <tr> <td style="text-align: center;">E00663</td> <td style="text-align: center;">May 2020</td> <td style="text-align: center;">-</td> <td style="text-align: center;">14.74</td> </tr> <tr> <td style="text-align: center;">E10847</td> <td style="text-align: center;">May 2020</td> <td style="text-align: center;">-</td> <td style="text-align: center;">10.98</td> </tr> <tr> <td style="text-align: center;">E00005</td> <td style="text-align: center;">May 2020</td> <td style="text-align: center;">-</td> <td style="text-align: center;">18.32</td> </tr> <tr> <td style="text-align: center;">E11276</td> <td style="text-align: center;">May 2020</td> <td style="text-align: center;">-</td> <td style="text-align: center;">50.00</td> </tr> </tbody> </table>			Estate Workers’ No	Month/Year	Travelling documents (RM)	Electricity (RM)	E10936	May 2020	-	8.35	E00813	May 2020	-	51.50	E10155	Jan 2020	200	-	E00663	May 2020	-	14.74	E10847	May 2020	-	10.98	E00005	May 2020	-	18.32	E11276	May 2020	-	50.00
Estate Workers’ No	Month/Year	Travelling documents (RM)	Electricity (RM)																																
E10936	May 2020	-	8.35																																
E00813	May 2020	-	51.50																																
E10155	Jan 2020	200	-																																
E00663	May 2020	-	14.74																																
E10847	May 2020	-	10.98																																
E00005	May 2020	-	18.32																																
E11276	May 2020	-	50.00																																
Corrections:	<p>Estate management was not aware of the syarat-syarat pematuhan permit pemotongan gaji as per stated in the both mention permits.</p> <p>There is no monitoring on the compliance of the syarat-syarat pematuhan as per permits requirement conducted by estate and mill management.</p>																																		
Root cause analysis:	<p>1. Immediately get written approval from all workers concerned for the deductions made as per permits requirements from the date of permits.</p>																																		

MSP0 Public Summary Report
Revision 1 (Feb 2020)

	2. To conduct training to estate and mill PIC on the Licence and permits compliance monitoring.
Corrective Actions:	<ol style="list-style-type: none"> 1. Standard workers consent letter will be attached together with the employment agreement, which will be briefed during the Induction Training before signed by the workers. 2. To include the training on permits/licence compliance into the annual training programme to ensure continues training conducted.
Assessment Conclusion:	As per consent letter, the permit from JTK(600-1/2/8/229(11/SDK/2019-0339)) dated valid until 30/12/2021 and Training record on 25/8/2020 on permit and license, Thus the evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment.

Major Nonconformities:		
Ref: 1932021-202007-M3	Area/Process: Genting Sabapalm Estate	Clause: Part 3; 4.6.1.1
	Issue Date: 10/7/2020	Due Date: Close on 5/10/2020
Requirements:	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	
Statement of Nonconformity:	Standard Operating Procedures are not consistently implemented.	
Objective Evidence:	<ol style="list-style-type: none"> 1. Section 6.8.2 Procedure of Social Management (Doc. No. SMP-GPB-32, Rev. 00 dated 18 Jan 2018 states that Workers Committee Meetings shall be conducted at least quarterly or whenever necessary. However, records show that the Workers' Committee Meetings at GSPE were held on 18 June 2019 and 14 Feb 2020. 2. Clause 3 (ii) of SOP Revision 3 dated 11 October 2013 - Langkah-Langkah Perlu Dipatuhi di Kawasan Perumahan, Pusat Asuhan Kanak-Kanak dan Sekolah effective January 2011 states that all animal coups ("pondok binatang") must be at least 50 metres away from the housing. At the linesite in Bangkawat Division and Kpg Bahagia 1, chicken coups were placed approximately 10m to 15m from the workers' houses. In addition, housing inspection reports have identified the issue of chicken coups locations in weekly inspection reports dated 7 Feb 2020, 11 Feb 2020, 20 April 2020, 18 May 2020, 4 June 2020, 22 June 2020. 3. Harvesters (Workers id: E11280, E11276 & E11307) were not provided with safety shoes, verified as per interview and Issuance Record. This does not comply with Standard Operating Procedure (SOP) revision 3 dated 11 Oct 2013. 	
Corrections:	<ol style="list-style-type: none"> 1. GSPE and GSOM to prepare committee meeting schedule for the year 2020 and the schedule to be verified by Mill Manager and Estate Senior Manager. The Sustainability Department will conduct checking on the schedule compliance during monthly follow up visit. To conduct training on procedure to the estate PIC and sustainability coordinator. Checklist on the meeting schedule to be prepared and verified by the Estate Manager. 2. Estate to carry out SOP briefing to the Bangkawat workers and any animal coups must be kept away from housing as per SOP. To ensure workers fully comply with the SOP requirements with the current shortage of staff and assistant, estate to 	

MSPO Public Summary Report
Revision 1 (Feb 2020)

	<p>conduct briefing on the SOP and workers to acknowledge the SOP requirements by signing a letter of consent of the action to be given if found not following the SOP requirements.</p> <p>3. To conduct training on the PPE issuance as per SOP requirements to the respective staff and assistant to improve knowledge and awareness regarding the SOP.</p>
Root cause analysis:	<p>1. GSOM and GSPE workers Committee (JCC) frequency of meeting was not according to the Procedure of Social Management was due to there is no effective monitoring on the frequency being done by GSPE. Frequency of meeting for GSPE Workers Committee (JCC) was not following the procedure requirements due to the PIC was never read the procedure and there is no checking by estate sustainability coordinator.</p> <p>2. Enforcement of SOP clause 3(ii) was not consistently implemented by estate and HA weekly housing inspection report regarding the issue was not taken seriously by estate. The SOP clause 3(ii) and HA weekly housing inspection report regarding the chicken coops was not effectively implemented due to shortage of staff and increase work load in paper work.</p> <p>3. No monitoring on PPE issuance conducted by the divisional staff and assistant.</p>
Corrective Actions:	<p>1. GSOM and GSPE to schedule its committee meeting to be the same date with OSH Committee meeting. OSH committee meeting was conducted at least once in three month as per OSHA 1994 requirements.</p> <p>2. To erect signage's at the workers housing on the SOP Requirements.</p> <p>3. Divisional Assistant in-charge to conduct monthly checking checklist on PPE issuance and replacement and to be verified by estate manager.</p>
Assessment Conclusion:	<p>The evidence of the correction and corrective action as per below were adequate to close the NCR:-</p> <p>1. Estate committee meeting schedule 2020</p> <p>2. SOP Briefing report to the workers and letter of consent.</p> <p>3. PPE monthly checking checklist</p> <p>Effectiveness of the implementation shall be verified in the next assessment.</p>

Major Nonconformities:		
Ref: 1932021-202007-M4	Area/Process: Genting Sabapalm Oil Mill	Clause: Part 4; 4.2.2.3
	Issue Date: 10/7/2020	Due Date: Close on 5/10/2020
Requirements:	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.	
Statement of Nonconformity:	Stakeholders lists are incomplete and not updated.	
Objective Evidence:	1. Timbalan Pengarah Pegawai Imigresen, AG Mohd Yusof, who was named as the nominated representative of the Sandakan Immigration Office has retired, and this change has not been updated in the Stakeholder Lists.	

MSPO Public Summary Report
Revision 1 (Feb 2020)

	2. GSOM employs 18 Indonesian workers. However, the Indonesian Consulate in Kota Kinabalu is not listed as stakeholders.
Corrections:	To update the stakeholder list accordingly to include latest Timbalan Pengarah Pegawai Imigresen, Indonesian Consulate in Kota Kinabalu
Root cause analysis:	<p>1. Changes on the Immigration Dept director was not inform by HR-GPOS to the OU's, because OUs has no direct contact/deal with the Immigration Dept since any issue related to this department is handled by HRAD at GPOS.</p> <p>2. The Indonesia Konsulat Jeneral in Kota Kinabalu and Philippines Embassy in Kuala Lumpur was not included in the GSOM and GSPE stakeholder list because Sustainability Department Sabah misunderstood that they are irrelevant since GSOM and GSPE have no direct contact with them.</p> <p>* HRAD – Human Resources & Administration Dept * GPOS – Genting Plantations Office Sabah, Sandakan.</p>
Corrective Actions:	<p>OUs shall update and verify the stakeholder list at least once a year at least once a year and/or before the internal sustainability audit and external certification audits – as per Social Management Procedure SMP-GPB-32, clause 6.2</p> <p>To update the social procedure to include the job responsibility of HR department to notify Operating unit of any changes.</p>
Assessment Conclusion:	As per latest stakeholder list dated June 2020, already included the Consulate of Indonesia and updated. The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment.

Major Nonconformities:

Ref: 1932021-202007-M5	Area/Process: Genting Sabapalm Oil Mill	Clause: Part 4; 4.4.5.8																					
	Issue Date: 10/7/2020	Due Date: Close on 5/10/2020																					
Requirements:	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.																						
Statement of Nonconformity:	Workers' overtime exceeding 104 hours were carried out without complying with the condition imposed by the Sabah Labour Office.																						
Objective Evidence:	<p>Paragraph 1.2 of the Permit issued by the Sabah Labour Office dated 18 May 2018 (Serial No. 600-1/2/13/9 (08/SDK/2018-0172) states that written consent from the worker is needed if they are required to do overtime exceeding 104 hours. However, overtime for the following GSOM workers were carried out without complying with the said condition:</p> <table border="1" data-bbox="448 1765 1390 2029"> <thead> <tr> <th>Worker No</th> <th>Maximum hours per month</th> <th>Month/Year</th> </tr> </thead> <tbody> <tr> <td>E00011</td> <td>106 hours</td> <td>March 2020</td> </tr> <tr> <td>E00027</td> <td>112.5 hours</td> <td>March 2020</td> </tr> <tr> <td>E00230</td> <td>118.5 hours</td> <td>March 2020</td> </tr> <tr> <td>E00286</td> <td>111.5 hours</td> <td>June 2020</td> </tr> <tr> <td>E00294</td> <td>104.5 hours</td> <td>Oct 2019</td> </tr> <tr> <td>E00309</td> <td>105 hours</td> <td>Oct 2019</td> </tr> </tbody> </table>		Worker No	Maximum hours per month	Month/Year	E00011	106 hours	March 2020	E00027	112.5 hours	March 2020	E00230	118.5 hours	March 2020	E00286	111.5 hours	June 2020	E00294	104.5 hours	Oct 2019	E00309	105 hours	Oct 2019
Worker No	Maximum hours per month	Month/Year																					
E00011	106 hours	March 2020																					
E00027	112.5 hours	March 2020																					
E00230	118.5 hours	March 2020																					
E00286	111.5 hours	June 2020																					
E00294	104.5 hours	Oct 2019																					
E00309	105 hours	Oct 2019																					

Corrections:	<ol style="list-style-type: none"> 1. Immediately get written approval from all workers concerned for overtime exceeding 104 hour from their date of employment, until end of employment. To get all workers consent for the overtime exceeding 104 hours from the date of the permits. 2. To conduct training to estate and mill PIC on the Licence and permits compliance monitoring.
Root cause analysis:	<p>Mill management was not aware of the syarat-syarat pematuhan permit pemotongan gaji and kerja lebih masa as per stated in the both mention permits.</p> <p>There is no monitoring on the compliance of the syarat-syarat pematuhan as per permits requirement conducted by the mill management.</p>
Corrective Actions:	<ol style="list-style-type: none"> 1. Standard workers consent letter will be attached together with the employment agreement, which will be briefed during the Induction Training before signed by the workers. 2. To include the training on permits/licence compliance into the annual training programme to ensure continues training conducted.
Assessment Conclusion:	<p>Verification on training record dated 10/7/2020 on Permit and license also briefing on Overtime more than 104 hours. The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment.</p>

Major Nonconformities:		
Ref: 1932021-202007-M6	Area/Process: Genting Sabapalm Oil Mill	Clause: Part 4; 4.6.1.1
	Issue Date: 10/7/2020	Due Date: Close on 5/10/2020
Requirements:	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	
Statement of Nonconformity:	Standard Operating Procedures are not consistently implemented.	
Objective Evidence:	<ol style="list-style-type: none"> 1. Section 6.8.2 Procedure of Social Management (Doc. No. SMP-GPB-32, Rev. 00) dated 18 Jan 2018 states that Workers Committee Meetings shall be conducted at least quarterly or whenever necessary. However, records show that the Workers' Committee Meetings at GSOM were held on 6 March 2020 and 8 Oct 2019. 2. No health declaration was conducted before entering confined space as verified from PTW dated 4/5/2019 and 2/5/2019. This was not followed as per Safe Operating Procedure for Confined space (GSOM-SOP-MGR-03) dated 3 Jan 2010. Last health declaration conducted was on 2017. 	
Corrections:	<ol style="list-style-type: none"> 1. GSOM to prepare committee meeting schedule for the year 2020 and the schedule to be verified by Mill manager. The Sustainability Department will conduct checking on the schedule compliance during monthly follow up visit. To conduct training on procedure to the estate PIC and sustainability coordinator. Checklist on the meeting schedule to be prepared and verified by the Estate Manager. 2. i) Amend SOP for Confined space (GSOM-SOP-MGR-03) ii) Conduct training to all workers on revised SOP for Confined space. 	

MSPO Public Summary Report
Revision 1 (Feb 2020)

	<p>iii) Health declaration form shall be attached with the PTW as a complete set Health declaration must be made prior to working in confine space area.</p> <p>iv) In October 2020, Person in-charge will be attended NIOSH course for Confined Space competent person ie Authorized Gas Tester, Entry Supervisor, Authorized Entry and Standby Person.</p>
Root cause analysis:	<p>1. GSOM workers Committee (JCC) frequency of meeting was not according to the Procedure of Social Management was due to there is no effective monitoring on the frequency being done by GSOM. Frequency of meeting for GSPE Workers Committee (JCC) was not following the procedure requirements due to the PIC was never read the procedure and there is no checking by estate sustainability coordinator.</p> <p>2. No proper checking by the manger / engineer and health declaration does not stated in Safe Operating Procedure for Confined space (GSOM-SOP-MGR-03).</p>
Corrective Actions:	<p>1. GSOM to schedule its committee meeting to be the same date with OSH Committee meeting. OSH committee meeting was conducted at least once in three month as per OSHA 1994 requirements.</p> <p>2. i) In October 2020, Person in-charge will be attended NIOSH course for Confined Space competent person i.e. Authorized Gas Tester, Entry Supervisor, Authorized Entry and Standby Person. Health Declaration form must be prepared for all confine space work by engineer and verified by mill manager. The health declaration must be checked by SHO during safety visit.</p>
Assessment Conclusion:	<p>The evidence of the correction and corrective action as per below were adequate to close the NCR:-</p> <ol style="list-style-type: none"> Estate committee meeting schedule 2020 SOP (GSOM-SOP-MGR-03) dated 20/7/2020 amended Training on new amended SOP (GSOM-SOP-MGR-03) dated 27/7/2020 Updated PPE checklist Health Declaration Record 2020. <p>Effectiveness of the implementation shall be verified in the next assessment.</p>

Opportunity For Improvement

Ref: 1932021-202007-I1	Area/Process: Genting Sabapalm Oil Mill	Clause: 4.3.1.1
Objective Evidence:	To ensure all workers that expose to noise (85-89dB or >90dB) are send for audiometric test as per recommendation (Report On Positive Initial Employee Noise Exposure Monitoring With Additional Areas dated 9 Oct 2012)	

Noteworthy Positive Comments

1	Good cooperation by management team/staff/sustainability team
2	The management have a good relationship with stakeholder
3	The smallholders are grateful for the assistance GSE renders in the purchase of fertilizer for their crop

3.3 Status of Nonconformities Previously Identified and OFI

Major Nonconformities:																	
Ref: 1750088-201903-M1	Area/Process: GSOM and Supply Base	Clause: Part 4: 4.6.3.2															
	Issue Date: 15/3/2019	Due Date: Closed (21/5/2019)															
Requirements:	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.																
Statement of Nonconformity:	Payments for contractors are not paid in timely manner as per agreed contract																
Objective Evidence:	<p>The contracts have been detailed out the pricing and the conditions of the FFB to be supplied to the mill. In the agreement stated the payment period should be made to the FFB supplier on or before 12 days of the next month from the month FFB delivered to the mill.</p> <p>Sighted the Paymet Advice for FFB supplier A Rahman Harry bin Diong for the month of January and February 2019 were made on the 15/1/2019 and 15/2/2019. The payment period were more than agreed in the 'Polisi Perolehan Tandan Buah Sawit'. This indicates the payments are not paid in timely manner as per agreed contract.</p>																
Corrections:	Marketing Department to communicate the agreement with finance department on the payment condition to FFB supplier.																
Root cause analysis:	The agreement details regarding the payment date for smallholders was not communicate by marketing with finance department.																
Corrective Actions:	Marketing department to provide the invoice details to the Finance department within the timeline agreed to ensure finance department could process the payment to the FFB supplier.																
Assessment Conclusion:	The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment.																
Verification Statement	<p>A Major Non-Compliance was raised in the previous Audit where payments for contractors were not paid in timely manner as per agreed contract. Reviewed during this current audit was the Addendum to Clause 4.0 (Outside FFB Purchase Policy) which took effect on 1 April 2019. This Addendum which was signed by FFB suppliers revised the payment period from 12th of every month to 15th of every month. Based on documentation review conducted during this current audit, evidence is available that FFB suppliers are being within the agreed timeframe of 15 days.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">FFB Suppliers</th> <th style="text-align: center;">Amount paid</th> <th style="text-align: center;">When paid</th> </tr> </thead> <tbody> <tr> <td>A Rahman Harry bin Diong</td> <td style="text-align: right;">RM8,905.85</td> <td style="text-align: center;">13 Nov 2019</td> </tr> <tr> <td>Ainon binti Todok</td> <td style="text-align: right;">RM1,473.95</td> <td style="text-align: center;">13 Nov 2019</td> </tr> <tr> <td>Abd Kadir bin Gilang</td> <td style="text-align: right;">RM3,894.87</td> <td style="text-align: center;">12 Jun 2020</td> </tr> <tr> <td>Maikol bin Kumar</td> <td style="text-align: right;">RM5,544.40</td> <td style="text-align: center;">13 Nov 2019</td> </tr> </tbody> </table> <p>Therefore, the Major Non-Compliance raised in the previous Surveillance Audit has been sufficiently closed.</p>		FFB Suppliers	Amount paid	When paid	A Rahman Harry bin Diong	RM8,905.85	13 Nov 2019	Ainon binti Todok	RM1,473.95	13 Nov 2019	Abd Kadir bin Gilang	RM3,894.87	12 Jun 2020	Maikol bin Kumar	RM5,544.40	13 Nov 2019
FFB Suppliers	Amount paid	When paid															
A Rahman Harry bin Diong	RM8,905.85	13 Nov 2019															
Ainon binti Todok	RM1,473.95	13 Nov 2019															
Abd Kadir bin Gilang	RM3,894.87	12 Jun 2020															
Maikol bin Kumar	RM5,544.40	13 Nov 2019															

MSPO Public Summary Report
Revision 1 (Feb 2020)

Major Nonconformities:		
Ref: 1750088-201903-M2	Area/Process: GSOM and Supply Base	Clause: Part 4: 4.5.3.3
	Issue Date: 15/3/2019	Due Date: Closed (21/5/2019)
Requirements:	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.	
Statement of Nonconformity:	The above requirement was not complied with.	
Objective Evidence:	There was no records of inventory and disposal to the authorised vendor for the disposal of the SW 410 (used PPE)	
Corrections:	1. Retrain store attendant and all workers on the Scheduled Waste Management System. 2. Training done on 22.03.2019.	
Root cause analysis:	No used PPE disposal in Schedule waste store.	
Corrective Actions:	Check on the month disposal schedule waste inventory record for any schedule waste not recorded.	
Assessment Conclusion:	The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment	
Verification Statement	<p>Sabapalm POM has established Standard Operating Procedure for handling of used chemicals and documented in Sustainability Management Procedure Manual title: Scheduled Waste Management; Doc. no. SMP-GPB-11; Rev. 01; Date: 11/6/2018.</p> <p>The Inventory of scheduled waste file reference no: ASSH/SDK(B)31/152/000/003 for June 2020. From the inventory was available for SW 102,305,306,408,409, 410 and 429.</p> <p>The disposal was done by Lagenda Bumimas Sdn Bhd. Sampling the consignment note for SW 410 No: 202002121243CYNK dated 12/02/2020. The license of Lagenda Bumimas Sdn Bhd (license no: 003441 & 003442) available for review. The competent person available in Sabapalm POM.</p> <p>Therefore, the Major Non-Compliance raised in the previous Surveillance Audit has been sufficiently closed.</p>	

Major Nonconformities:		
Ref: 1750088-201903-M3	Area/Process: GSOM and Supply Base	Clause: Part 3: 4.4.5.9
	Issue Date: 15/3/2019	Due Date: Closed (21/5/2019)
Requirements:	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	
Statement of Nonconformity:	Payment documented on the pay slips not in line with legal regulations and collective agreements	
Objective Evidence:	2 out of 10 workers sampled was found that deduction was made to the FFB Checker (Employee No. P10024 and E10104) without any consent obtained from the authority for the penalty of sending unripe FFB to mill. Seen the deduction under category of Utilities (A. Deduction) for November 2018 and February 2019. Confirmed with the management that this was their practice to deduct FFB Checker if no proper segregation was made for unripe and ripe FFB	

MSPO Public Summary Report
Revision 1 (Feb 2020)

Corrections:	To stop the deduction to the FFB checker for the unripe bunches
Root cause analysis:	The deduction to the FFB checker was implemented according to Estate FFB Quality SOP to ensure only good quality of FFB sent to the Mill
Corrective Actions:	1. To review the estate SOP on FFB Quality. (Tugas Checker 2018) 2. Internal audit checklist by Sustainability Department to check on unauthorized deduction.
Assessment Conclusion:	The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment.
Verification Statement	Wages and overtime payment are clearly detailed out in the sampled pay slips. Payslips for the following GSE workers were observed for October 2019, Jan 2020, March 2020, June 2020: Workers No. E10936, E00813, E10155, E00663, E10847, E00005, E11276. The wages are in line with legal requirements in that it contains records of all income received (basic daily wage, overtime calculation), deductions (EPF, SIPS, SOCSO for local workers, and SOCSO for foreign workers). Therefore, the Major Non-Compliance raised in the previous Surveillance Audit has been sufficiently closed.

Major Nonconformities:

Ref: 1750088-201903-M4	Area/Process: GSOM and Supply Base	Clause: Part 3 4.5.3.3
	Issue Date: 15/3/2019	Due Date: Closed (21/5/2019)
Requirements:	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.	
Statement of Nonconformity:	The above requirement was not complied	
Objective Evidence:	There was no records of inventory and disposal to the authorised vendor for the disposal of the SW 410 (used PPE)	
Corrections:	Proper training will be held for the person in charged about monitoring and documentation record of disposal SW 410 (used PPE).	
Root cause analysis:	Ineffective training for the person in charged about disposal and recording of SW 410 (used PPE).	
Corrective Actions:	1. The SW 410 (used PPE) will be disposal by certificate agent. 2. The training about SW 410 (used PPE) SOP will be included in yearly training metric for monitoring.	
Assessment Conclusion:	The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment	
Verification Statement	With regards to scheduled wastes disposal, the visited operating units have satisfactorily maintained the regulated documents such as notification, inventory records and consignment notes through e-swiss. Among the scheduled wastes generated by the operating units were spent lubricants, spent batteries, contaminated filters & rags, contaminated PPE and clinical wastes to name a few.	

MSPO Public Summary Report
Revision 1 (Feb 2020)

	<ul style="list-style-type: none"> disposal of empty chemical containers [ref.: used plastic pesticides container recycling (UPPCR) Collection Form by G-Planter dated 3/7/2020] at Sabapalm Estate disposal of recyclable wastes i.e. carton box [ref.: City Express Recycling Sdn Bhd weighbridge receipt #014391, dated 13/3/2020] <p>Therefore, the Major Non-Compliance raised in the previous Surveillance Audit has been sufficiently closed.</p>
--	--

Minor Nonconformities:		
Ref: 1750088-201903-N1	Area/Process: GSOM and Supply Base	Clause: Part 4: 4.3.1.4
	Issue Date: 15/3/2019	Due Date: Closed on 10/7/2020
Requirements:	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements	
Statement of Nonconformity:	The monitoring of the license compliance was ineffective	
Objective Evidence:	There was ineffective monitoring of the MPOB license having the fact that the total FFB processed in the entire year (1/11/17 – 31/10/18) is 115793.57mt exceeding 19793.57mt equivalent to 20.61% of the approved quantity.	
Corrections:	Monitor year to-date FFB process by monthly basis.	
Root cause analysis:	There is no monitoring on the actual FFB process against the MPOB license.	
Corrective Actions:	Divert the FFB to other Genting oil mill for processing if projected to be over capacity by the year end or as per MPOB license validity period.	
Assessment Conclusion:	The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment	
Verification Statement	As per FFB process record todate show that not exceed the MPOB license approval. The record was available for review and up to date thus minor NC close accordingly.	

Minor Nonconformities:		
Ref: 1750088-201903-N2	Area/Process: GSOM and Supply Base	Clause: Part 4: 4.4.6.3
	Issue Date: 15/3/2019	Due Date: Closed on 10/7/2020
Requirements:	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure	
Statement of Nonconformity:	The above requirement was not complied with.	
Objective Evidence:	The understanding of the PPE adherence on working at height and CPO dispatches to be enhanced for the operators and the tanker drivers.	
Corrections:	To update HIRARC and install the safety hardness hanger.	
Root cause analysis:	Dispatch area not safe for operator and tanker driver.	
Corrective Actions:	<ol style="list-style-type: none"> HIRARC updated on 23.03.19 and safety hardness has been installed. Dispatch operator, Lab Conductor, engineer and Manager to make sure safety procedure is follow. 	

Assessment Conclusion:	The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment
Verification Statement	During site verification and interview at CPO dispatch, the harness been using during working and the person in charge was aware regarding the safety purpose of harness thus Minor NC was close accordingly.

Minor Nonconformities:		
Ref: 1750088-201903-N3	Area/Process: GSOM and Supply Base	Clause: Part 3: 4.4.5.4
	Issue Date: 15/3/2019	Due Date: Closed on 10/7/2020
Requirements:	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.	
Statement of Nonconformity:	No evidence of contract agreement between contractors and their workers	
Objective Evidence:	Employment contract for all contractors' workers was not available in estate for review.	
Corrections:	The contractor to provide written agreement between the contractor and his workers and to send to estate for record keeping and future reference.	
Root cause analysis:	There is only verbal agreement between the contractor and his workers since the estate did not request any written agreement.	
Corrective Actions:	Any new contractors engaged in future must provide written agreement between workers & contractor to estate for future reference. The contractor must amend the terms & condition as per estate requirement in case there is any changes	
Assessment Conclusion:	The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment	
Verification Statement	GSPE is able to demonstrate that contractors' employees are paid based on legal or industry minimum standard. Syarikat Tan Hong Transport is GSPE's FFB transporter provided proof of payment for June 2020 for its drivers. Based on the ledger, GSPE is able to demonstrate that contractor's workers receive payment above minimum wage. The amount paid is also acknowledged in writing by the respective workers. There is also evidence that the workers' SOCSO contributions were made, Thus Minor NC was close accordingly	

Minor Nonconformities:		
Ref: 1750088-201903-N4	Area/Process: GSOM and Supply Base	Clause: Part 3: 4.4.6.3
	Issue Date: 15/3/2019	Due Date: Closed on 10/7/2020
Requirements:	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure	
Statement of Nonconformity:	There was no training made in relation to the management of peat soil and effective understanding of whistle blowing policy.	
Objective Evidence:	a) During the site visit GSPE block 67 P20101 on 13/3/19 there was less understanding of the peat soil management	

MSPO Public Summary Report
Revision 1 (Feb 2020)

	b) During an interview with a staff on 14/3/19 the guidelines provided in the whistle blowing policy was unable to be understood.
Corrections:	No SOP found on the peat soil management No effective training on whistle blowing policy.
Root cause analysis:	a) New SOP or guidelines on the peat soil management b) Continuous training on whistle blower policy will be held.
Corrective Actions:	a) The training for both finding will be held b) The training for both finding will be held c) The monitoring on this both finding will be included in the training metric.
Assessment Conclusion:	The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment
Verification Statement	In Sabapalm estate, the staff and workers training need analysis was conducted to determined type of training needed, this also included peat soil management. The record dated 7 Jan 2020 analysis was include person incharge for peat soil area. Latest training on peat soil was on July 2019. The existing planting on peat area are managed according to the RSPO manual on Best Management Practices such as water table management and piezometer motoring thus Minor NC was close accordingly.

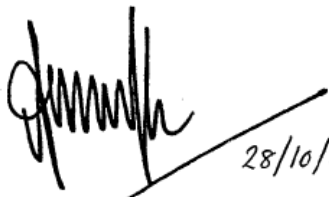

3.4 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1932021-202007-M1	Major	10/7/2020	Closed on 5/10/2020
1932021-202007-M2	Major	10/7/2020	Closed on 5/10/2020
1932021-202007-M3	Major	10/7/2020	Closed on 5/10/2020
1932021-202007-M4	Major	10/7/2020	Closed on 5/10/2020
1932021-202007-M5	Major	10/7/2020	Closed on 5/10/2020
1932021-202007-M6	Major	10/7/2020	Closed on 5/10/2020
1750088-201903-M1	Major	15/3/2019	Closed on 21/5/2019
1750088-201903-M2	Major	15/3/2019	Closed on 21/5/2019
1750088-201903-M3	Major	15/3/2019	Closed on 21/5/2019
1750088-201903-M4	Major	15/3/2019	Closed on 21/5/2019
1750088-201903-N1	Minor	15/3/2019	Closed on 10/7/2020
1750088-201903-N2	Minor	15/3/2019	Closed on 10/7/2020
1750088-201903-N3	Minor	15/3/2019	Closed on 10/7/2020
1750088-201903-N4	Minor	15/3/2019	Closed on 10/7/2020

3.5 Issues Raised by Stakeholders

IS #	Description
1	<p>Issues: Local communities and smallholders from Kg Tagas Tagas confirmed good relationship with GSE. They confirmed that there is no land claims against GSE. The smallholders are grateful for the assistance GSE renders in the purchase of fertilizer for their crop, which is repayable in 6 monthly instalments.</p> <p>Management Responses: Noted the local communities' and smallholders' comments.</p> <p>Audit Team Findings: No further issue.</p>
	<p>Issues: SK Ladang Sabapalm is a primary school where its pupils comprise mainly estate workers' children and some pupils from Kg Tagas Tagas. The Headmaster of SK Ladang Sabapalm informed that because the estate premises is located within the land lease of GSE, the school is no longer entitled to financial assistance/budget allocation from the government. Therefore, it is now relying on the contributions in cash and in kind from GSE, for which they are grateful. Among the contributions received included paint, wood for repairs, tables and chair, free electricity and treated water, repair works, housing for teachers, etc. The Headmaster also wanted to know what happened to the plan to build a school signboard which GSE promised. The Headmaster is worried that if GSE decides to demolish the old wooden houses which are currently occupied by the teachers, they would have no place to stay.</p> <p>Management Responses: Contributions to SK Ladang Sabapalm will continue as part of its CSR programme. GSE is only demolishing houses which are not occupied and not those which are occupied by the teachers. Management will soon be reviving the sign board project.</p> <p>Audit Team Findings: Sighted evidence of cash and in-kind contributions from GSE to SK Ladang Sabapalm which include repairs, supply of treated water, maintenance work, tables and chairs, etc. Visit to the linesite also shows that the houses occupied by the teachers have not been earmarked for demolition. No further issue.</p>
	<p>Issues: Contractors confirmed that business relationship with GSE is good. Payments are received in a timely manner. Contracts are clear and fair. They receive invitations from GSE to attend stakeholder meetings where awareness briefings were given on MSPO, RSPO, ISCC requirements.</p> <p>Management Responses: Comments are noted.</p> <p>Audit Team Findings: Sighted contracts between GSE and transporters which have been verified as fair, legal and transparent. Invoices and payment vouchers were also sighted and confirmed that payments are being made in a timely manner.</p>

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment Genting Sabapalm Oil Mill and Supply Base Certification Unit complies with the <i>MS 2530-3:2013 or MS 2530-4:2013</i> . It is recommended that the certification of Genting Sabapalm Oil Mill and Supply Base Certification Unit is approved and/or continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Mr. Arunan Kandasamy	Name: Muhamad Naquiddin Mazeli
Company name: Genting SDC Sdn Bhd	Company name: BSI Services Malaysia Sdn Bhd
Title: SVP-Plantation (Malaysia)	Title: Client Manager
Signature:  Date: 28/10/2020	Signature:  Date: 22/10/2020

Appendix A: Summary of the findings by Principles and Criteria

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	Genting Plantation has established MSPO Policy signed by the President and Chief Operating Officer dated 18/3/2014 and is applicable to the Genting Sabapalm certification unit.	Yes
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The established policy has emphasized on the commitment to continual Improvement within the journey towards achieving sustainable palm oil.	Yes
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Sustainability Department has conducted the internal audit on annually basis. Any non-conformities found during the internal audit has to be addressed by the operating units and CAP need to be established. Genting Sabapalm estate Internal audit – 18-21/2/2020, NCR – 11 NC, close nc on 7-11 June 2020 Sighted that all findings still in progress of corrective actions. It was	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		found that for both NCRs and OBS, no specific MSPO indicators were referred to the findings. It will be better if MPSO indicators/clauses number to be included in the audit findings/reporting.	
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Internal Audit procedure is available under SMPM (sustainability management procedure manual), entitled "Sustainability Internal Audit" document no SMP-GPB-03, rev. 4, dated 25 May 2018. Among the contents covered in the procedure are audit criteria, audit schedule, audit plan, responsibility of lead auditor & auditee and audit report, which to be kept for 10 years.	Yes
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	Report of Internal Audit for all the visited estates were made available for review dated Jan 2020.	Yes
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	The management review was done periodically based, latest record was on 25 June 2020. The discussion was include the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO. Procedure Manual under section Management Review refer document no SMP-GPB-06 rev 1 dated 25/5/2018. Among the agenda discussed in the meeting were: 1) Status of outstanding issues from previous meetings 2) Changes, improvement or modification of the sustainability management system (SMS) 3) Internal and external audit findings (SMS) 4) Complaints and grievance book 5) Enquiry register book	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		6) Stakeholder management reports/minutes 7) Risk management 8) Greenhouse value 9) Review continual improvement status & recommendations 10) Review on resource & training requirements 11) Review on sustainability policy & its objectives status 12) Review of effectiveness in achieving QEO objectives 13) Compliance status on legal & other requirements 14) Other matters 15) Preventive & corrective actions 16) Recommendations for improvement 17) Result of internal RSPO SCCS & MSPO SCCS audit 18) Customer feedback 19) Changes that could affect the management system	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -	Genting Plantations Berhad is open to all the stakeholders to request information such as policies, SEIA reports and management plans, audit reports, pollution reduction plans, complaint & grievances procedure, FPIC procedure and land title. The stakeholders will fill in the Enquiry Register Book in order to access to the documents.	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Sustainability Report and Annual Report will be publicly available in the company's website: www.gentingplantations.com. Sample of Continual Improvement for 2020 at all estate visited:</p> <ol style="list-style-type: none"> 1) Optimize yield 2) Reduction in use of certain pesticides 3) Minimize soil erosion 4) Waste reduction 5) Pollution and greenhouse gas emissions 6) Social impact on communities, workers and smallholder 7) Integrated management of HCV-HCS, peatland and other conservation areas. 	
4.1.4.2	<p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p>- Major compliance -</p>	<p>The estate currently on trial to use new machinery, Big Bull to improve FFB evacuation at peat area. Refresher training was conducted on 21/11/2018. This project still in progress, the new information and techniques to improve practices are obtained mainly through information from communications with suppliers and being members of associations related to palm oil industry (e.g. ISP).</p>	Yes
4.1.4.3	<p>An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established.</p> <p>- Major compliance -</p>	<p>Action plans were available in estates, the action plan is cover for environment, workers' needs, safety and others. Trainings on SOPs were also conducted from time to time to enhance the current techniques of agriculture best practice. This was evident through availability of training records and interview with workers.</p>	Yes
4.2 Principle 2: Transparency			

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
<p>4.2.1.1</p>	<p>The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>The management communicates adequate information to other stakeholders on environmental, social and legal issues as evidenced during the stakeholder meeting held on 10 March 2020. The briefing was conducted by the Assistant Manager Sabapalm Estate and Sustainability Manager. Among the contents of the briefing include HCV, MSPO, RSPO requirements as well as changes to the legal requirement.</p> <p>In addition, the Mill also has written to its stakeholders on the documents available for review. Sighted was a letter dated 30 June 2020 to IOI Edible Oils Sdn Bhd which details out procedure which allows for stakeholders to view the following documents at Genting Sabapalm Estate office:</p> <ul style="list-style-type: none"> - land titles, map, boundary markers - company policies - HCV, EIA and SIA reports - RSPO, MSPO reports - Fire prevention plan - Continuous improvement plan - Complaints and grievance procedure - Complaints and grievance book - Negotiation and compensation procedure - Sexual harassment complaints procedure 	<p>Yes</p>

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.2.1.2	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>The above mentioned documents are publicly available at the Mill office which was verified and reviewed during the audit. Any request of information shall be recorded in the Mill's Enquiry Register Book. As of the date of this audit, there is no record of any request for information from any stakeholders.</p>	Yes
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>An SOP for consultation and communication has been established and documented. It is contained in Sustainability Management Procedure Manual under section Procedures for Consultation and Communication, Document No. SMP-GPB-17, rev. 02 dated 23 Feb 2018.</p>	Yes
4.2.2.2	<p>A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.</p> <p>- Minor compliance -</p>	<p>Estate Senior Manager via letter dated 6 April 2017.</p> <p>The management official responsible is the GSE's Senior Manager appointed via letter dated 6 April 2017.</p>	Yes
4.2.2.3	<p>List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.</p> <p>- Major compliance -</p>	<p>The Stakeholder Lists for GSE was updated up to June 2020 which contain list of stakeholders such as contractors, suppliers, smallholders, neighbouring estates and businesses, government agencies, clinics, schools, local communities, NGO, etc. The list also contains details of the stakeholder such as their names, nominated representatives and their designation, addresses and contact numbers. However, the Timbalan Pengarah Pegawai Imigresen, AG Mohd Yusof, who was named as the nominated representative of the Sandakan Immigration Office has retired, and this change has not been updated.</p>	No

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Additionally, as of June 2020, GSE employs 391 Indonesian workers and 2 Philippines nationals. However, the Indonesian Consulate in Kota Kinabalu and the Philippines Embassy in Kuala Lumpur are not listed as stakeholders in both stakeholder lists.</p> <p>Therefore, a Major Non-Compliance was issued.</p>	
Criterion 4.2.3 – Traceability			
4.2.3.1	<p>The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).</p> <p>- Major compliance -</p>	<p>Traceability requirements established as Sustainability Management Procedure for Traceability; SMP-GPB-09; Rev. 04; Date: 24/8/2018.</p>	Yes
4.2.3.2	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p>- Major compliance -</p>	<p>Regular inspections conducted regularly by estate management with assistance from HQ Sustainability Personnel whom conducted periodical internal audit. Details of internal audit as per Criterion 4.1.2 above.</p>	Yes
4.2.3.3	<p>The management should identify and assign suitable employees to implement and maintain the traceability system.</p> <p>- Minor compliance -</p>	<p>The management already identified and assign the employee to implement and maintained the traceability system as per below;-</p> <p>Appointment was made as following:</p> <p>- Appointment – MSPO Committee Traceability Officer – Pn Mariayati Binti Bakri (Office Clerk) and Pn Florinda Kiming; Date: 1 Sept 2014 – Sabapalm Estate</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	Records of sales, delivery/transportation maintained as per following samples: Sabapalm Estate: - Weighbridge ticket # 131951; Date: 21/1/2020; Field # 9 & 2; Product: FFB; Nett Weight: 4.02mt; Vehicle # TH-10 - Weighbridge ticket # 131954; Date: 22/1/2020; Field # 3 & 2; Product: FFB; Nett Weight: 6.81; Vehicle # TH-10	Yes
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	All legal requirement has documented in Legal Requirement Register. Refer doc no. SMP-GPB-22 rev. 08 dated March 2020. The latest review included the Ethical Business Conduct. Compliance to each applicable law and regulation is monitored by the operating units through List of License, Permits and Approval Certificates. Refer document no. SP-MGR-03-F02-01. Latest review was conducted on Jan 2020. Sighted the sampled evidence of compliancy to the regulation as follows: Genting Sabapalm Estate	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<ol style="list-style-type: none"> 1. MPOB license 523495002000 valid until 30/09/2020 2. License for Pemasangan Persendirian (2018/00242) valid until 28/04/2021 3. License for Air compressor PMT-SB 1926579 valid until 28 Nov 2020 4. License for Air compressor PMT-SB 1928043 valid until 16 Jan 2021 5. JTK license for wages deduction (600-1/2/13/9(11/SDK/2020/8-0380) valid until 9 Dec 2020. 6. License for Petrol keeping (KPDNHEP.SDK.12/2012/(SK)(S002409) valid until 12/9/2020 <p>Based on the employment contracts and payslips sighted, evidence is available that GSE complies with the applicable laws which include:</p> <p>Minimum Wages (Amendment) Order 2020; Sabah Labour Ordinance Immigration Act 1959/63; Employment Insurance System 2017; Employers' Provident Fund Act 1991; Employees' Social Security Act 1969.</p>	
4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>All legal requirement has documented in Legal Requirement Register. Refer doc no. SMP-GPB-22 rev. 06 dated 31 Jan 2019. The latest review included the Minimum Wages Order 2018.</p> <p>Compliance to each applicable law and regulation is monitored by the</p>	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		operating units through List of License, Permits and Approval Certificates.	
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>In Genting Plantation the Legal register and requirement already been updated by System and Method department. Among the newly registered laws were:</p> <ul style="list-style-type: none"> - Financial Services act 2013 - Malaysia Anti – corruption Commission Act 2009 - Anti – Corruption Act 1997 - Penal Code 2015 - Whistle-blower Protection Act 2010 - Sales Tax Act 1972 - Min Wages 2020 <p>Refer document no. SP-MGR-03-F02-01. Latest review was conducted on Jan 2020.</p>	Yes
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>Management assigned either Assistant manager or Chief Clerks/clerks as person responsible to monitor compliance and tracking/updating changes in legal requirements. Sighted sample letter of appointment as following:</p> <p>Appointment as person in-charge for updating changes in legal MSPO: Legal Officer–Pn Helena Bulukan (Chief Clerk); Date: 6/8/2015 – Sabapalm estate.</p>	Yes
Criterion 4.3.2 – Lands use rights			

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance															
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	The oil palm cultivation activities of GSE are being carried out within the valid legal lease issued by the Director of Land and Surveys was done on behalf of the Government of Sabah to Sabah Devt Co Sdn Bhd specified for the purpose of oil palm cultivation. For details, refer to Indicator 4.3.2.2 below. As of the date of this audit, there is no evidence of any land dispute GSE. This was based on documentation review and also confirmed during audit interviews with the local community.	Yes															
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	Evidence of legal ownership over the estate land is available in the form of lease documents. Sampled during the audit were the following documents: Issuance of leases by the Director of Land and Surveys was done on behalf of the Government of Sabah to Sabah Devt Co Sdn Bhd specified for the purpose of oil palm cultivation as follows: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Title No. Lease</th> <th style="text-align: left;">Hectarage</th> <th style="text-align: left;">Period of lease</th> </tr> </thead> <tbody> <tr> <td>08510997</td> <td>2118.12</td> <td>999 years from 10.07.1888 – 10.07.2887</td> </tr> <tr> <td>08510996</td> <td>1957.46</td> <td>999 years from 10.07.1888 – 10.07.2887</td> </tr> <tr> <td>085319231</td> <td>283</td> <td>98 years from 01.01.1987 – 31.12.2085</td> </tr> <tr> <td>Total hectarage</td> <td>4358.58</td> <td></td> </tr> </tbody> </table>	Title No. Lease	Hectarage	Period of lease	08510997	2118.12	999 years from 10.07.1888 – 10.07.2887	08510996	1957.46	999 years from 10.07.1888 – 10.07.2887	085319231	283	98 years from 01.01.1987 – 31.12.2085	Total hectarage	4358.58		Yes
Title No. Lease	Hectarage	Period of lease																
08510997	2118.12	999 years from 10.07.1888 – 10.07.2887																
08510996	1957.46	999 years from 10.07.1888 – 10.07.2887																
085319231	283	98 years from 01.01.1987 – 31.12.2085																
Total hectarage	4358.58																	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.	Legal boundaries at estates visited were clearly demarcated with red and white colour concrete pole/ wooden stick. Sighted during site visit at the estates boundaries. Sampling at site visit – Field 36 and Muktarrudin Buyong	Yes															

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	Oil palm plantation activities have been made within the area on its valid legal leases. Based on documentation review, interviews with local communities, there is no evidence of any legal, customary or user rights of other users on any of the estates within GSE.	Yes
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	The land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal leases. Based on documentation review, interviews with local communities, there is no evidence of any legal, customary or user rights of other users on any of the estate divisions within GSE.	Yes
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	The land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal leases. Based on documentation review, interviews with local communities, there is no evidence of any legal, customary or user rights of other users on any of the estate divisions within GSE.	Yes
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	The land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal leases. Based on documentation review, interviews with local communities, there is no evidence of any legal, customary or user rights of other users on any of the estates within GSE.	Yes

Criterion / Indicator	Assessment Findings	Compliance	
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	<p>Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.</p> <p>- Minor compliance -</p>	<p>GSE has carried out a Social Impact Assessment & Human Rights Impact Assessment. The findings are contained in Report for Genting Sabapalm Estate and Genting Sabapalm Oil Mill 19th – 21st June 2019 3rd revision. This report was prepared by the Sustainability Department dated August 2019. There is evidence that the SIA and Human Rights Impact Assessments were carried out with the participation of affected stakeholders as evidenced from pictorial evidence, report contents, and confirmed by stakeholders during audit interviews. Those consulted were both foreign and local workers, contractors, villagers, and government officers. The findings were tabulated and contain both positive and negative comments.</p> <p>Among the positive comments include good relationship and continuous communications between the estate and mill with SK Tagas Tagas, supply of treated water during the draught season, patching of common road leading to the school, supply of water to the school and nearby villages, transparent FFB prices, clear border demarcation and no land disputes with the local community, and job opportunities to the nearby villagers.</p> <p>Among the negative comments include speeding motorists in front of the school, foreign workers refusing to go for medical check-ups during</p>	<p>Yes</p>

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<p>pregnancy, unsatisfactory attendance at HUMANA school, attendance not satisfactory, and issue of speeding motorists in front of school.</p> <p>The SIA has also identified the issue of undocumented dependants among estate and mill foreign workers, and foreign workers' lack of understanding of the process/procedure for applying birth certificates for foreign children. Among the action plan identified include providing clear information to the workers' representatives on the procedures of registering foreign workers' dependants.</p>	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>A complaints and grievance procedure has been established and documented and is available in Doc No. SMP-GPB-19 Rev 04 issue date March 2020.</p>	Yes
4.4.2.2	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p>- Major compliance -</p>	<p>The complaints and grievance procedure contained in Doc No. SMP-GPB-19 Rev 04 issue date March 2020 states that the time frame for resolving the complaint would depend on the seriousness of the said grievance or complaint, and that the accepted timeframe to respond is within one month of receipt of the complaint or grievance.</p>	Yes
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p>- Minor compliance -</p>	<p>Complaint forms are made available at the Estate office in the form of Complaints/Grievance Record Book. Sighted during the audit was the complaints/grievances received was complaint dated 13 May 2020 for defective fan. Acknowledgement by the house occupant was also sighted.</p>	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.4.2.4	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p> <p>- Minor compliance -</p>	<p>The employees were made aware of the complaints procedure during Workers' Committee Meetings which were held at the Mill on 6 March 2020 and 8 Oct 2019. The surrounding communities were made aware of the procedure during stakeholder meeting on 10 March 2020.</p>	Yes
4.4.2.5	<p>Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.</p> <p>- Major compliance -</p>	<p>Based on the Complaints /Grievances Record Book, complaints and solutions within the past 24 months were being documented and are available to affected stakeholders upon request. So far there has been no such request from the stakeholders.</p>	Yes
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	<p>Growers should contribute to local development in consultation with the local communities.</p> <p>- Minor compliance -</p>	<p>Evidence is available that contributions to community development are being made. This is a joint effort between SGOM and GSE as GSOM is an integral part of GSE. Based on audit interviews with affected stakeholders and review of documents, the following contributions were made:</p> <ul style="list-style-type: none"> -Potable water for workers of Styland Estate (neighbouring estate); -Potable water for villagers of Kg Lumantik; -Replacing old and unsafe chairs and tables at SK Ladang Sabapalm; -30 chairs and 6 cans of paint; -General maintenance and repair services to SK Ladang Sabapalm; -Free electricity and treated water to SK Ladang Sabapalm; -Estate accommodation to 7 teachers from SK Ladang Sabapalm; -Job opportunities to the local community. 	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	The Occupational Safety And Health Policy was established, signed by President and Chief Operating Officer on 1st July 2018. The policy was communicated during Policy briefing from time to time. The policy was displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH personnel from Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors. In interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the policy.	Yes
4.4.4.2	The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified	a. The Occupational Safety and Health Policy was established, signed by President and Chief Operating Officer on 1st July 2018. Latest policy have been communicated on 31 Jan 2020 to all workers. b. The risk assessment for chemical (CHRA) already been conducted by QMSPRO Snd Bhd (HQ/07/ASS/00/236) on 31 Oct 2019 and some amended on 30 Jan 2020 (HQ/03/ASS/00/154) for G-Planter Sdn Bhd. For all operation in estate, the risk and hazard already been assess and recorded under HIRARC. Latest was done on August 2019 on Harvesting area. No new activity in estate the assessment was updated accordingly. c. The awareness and training programme was available for review in each estate been sample. Sample on estate already been review for Year 2020 on Jan 2020 d. The estates provide PPE to the employees relevant to the work handled by the workers .Issuance PPE record available under	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator	Assessment Findings	Compliance
<p>in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>personal file for review, sampling on workers id (E10017) latest ppe issuance was on 4 July 2020.</p> <p>e. SOP for chemical management (Rev 3, Dated Oct 2013) was established. Register of Chemical was sighted to include the entire chemical used in the estate such as Ken Amine, Ken Glyphosate, Ally 20DF, Basta 15, Impact 75, Promax and etc.</p> <p>f. Responsible person for safety and health already identified as per OSH organization chart. Manager was the one that responsible as safety and health.</p> <p>g. In Sabapalm estate, OSH Meeting was done periodically, latest record 28/2/2020 and previously was on 10/12/2019. The management already arrangement for next meeting will be conduct on 24 July 2020.</p> <p>h. The Estates has site specific Plans in the OSH Manual (OM-GPB- 04, Rev:0, Dated 1/1/10) including ERP for accident, ERP for Fire, ERP for chemical spillage, maps showing assembly areas and up to date lists of emergency contacts with training conducted to communicate the Plan</p> <p>i. As for First aid training, all mandores was equipped with First aid approved content. The first aid training conducted on 8 Feb 2019, trained by HA to all first aider. As verification at site mandore (workers id E10699, and E00287) was aware regarding to First aid.</p> <p>j. The JKKP 8 As per incident report JKKP 8(JKKP 8/43086/2019) dated 7/1/2020, 6 incident recorded.</p>	

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>GSE subscribes to the Genting Plantations Berhad’s People Policy dated 3 August 2009. The People Policy states the Group’s commitment to not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.</p> <p>The Policy also states that no one shall be denied their rights to equal opportunities. These Policies are publicly displayed at all main notice boards within the premises.</p>	<p>Yes</p>
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>GSE subscribes to Genting Plantations Berhad’s People Policy dated 3 August 2009. The People Policy states the Group’s commitment to not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.</p> <p>The Policy also states that no one shall be denied their rights to equal opportunities. These Policies are publicly displayed at all main notice boards within the premises.</p>	<p>Yes</p>
4.4.5.3	<p>Management shall ensure that employees’ pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>Based on the employment contracts and pay slip, there is evidence that GSE employees receive at least minimum wages of RM42.31 per day, or RM1,100 per month. This is in accordance with the Minimum Wages (Amendment) Order 2020.</p> <p>However, salary deductions for the following GSE workers were made without complying with paragraph 2.2 of the Permit issued by the</p>	<p>No</p>

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance																																		
		<p>Sabah Labour Office dated 31 December 2019 (Serial No. 600-1/2/8/229 (11/SDK/2019-0339). Paragraph 2.2. requires that a written consent from the workers to be obtained for the salary deductions. However, for the following workers, no written consent was obtained:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Workers' No</th> <th>Month/Year</th> <th>Travelling documents (RM)</th> <th>Electricity (RM)</th> </tr> </thead> <tbody> <tr> <td rowspan="7">Sabapalm Estate</td> <td>E10936</td> <td>May 2020</td> <td>-</td> <td>8.35</td> </tr> <tr> <td>E00813</td> <td>May 2020</td> <td>-</td> <td>51.50</td> </tr> <tr> <td>E10155</td> <td>Jan 2020</td> <td>200.00</td> <td>-</td> </tr> <tr> <td>E00663</td> <td>May 2020</td> <td>-</td> <td>14.74</td> </tr> <tr> <td>E10847</td> <td>May 2020</td> <td>-</td> <td>10.98</td> </tr> <tr> <td>E00005</td> <td>May 2020</td> <td>-</td> <td>18.32</td> </tr> <tr> <td>E11276</td> <td>May 2020</td> <td>-</td> <td>50.00</td> </tr> </tbody> </table> <p>Therefore, a Major Non-Compliance was raised.</p>	Estate	Workers' No	Month/Year	Travelling documents (RM)	Electricity (RM)	Sabapalm Estate	E10936	May 2020	-	8.35	E00813	May 2020	-	51.50	E10155	Jan 2020	200.00	-	E00663	May 2020	-	14.74	E10847	May 2020	-	10.98	E00005	May 2020	-	18.32	E11276	May 2020	-	50.00	
Estate	Workers' No	Month/Year	Travelling documents (RM)	Electricity (RM)																																	
Sabapalm Estate	E10936	May 2020	-	8.35																																	
	E00813	May 2020	-	51.50																																	
	E10155	Jan 2020	200.00	-																																	
	E00663	May 2020	-	14.74																																	
	E10847	May 2020	-	10.98																																	
	E00005	May 2020	-	18.32																																	
	E11276	May 2020	-	50.00																																	
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>GSE is able to demonstrate that contractors' employees are paid based on legal or industry minimum standard. Syarikat Tan Hong Transport is GSE's FFB transporter provided proof of payment for June 2020 for its drivers. Based on the ledger, GSE is able to demonstrate that contractor's workers receive payment above minimum wage. The amount paid is also acknowledged in writing by the respective workers. There is also evidence that the workers' SOCSO contributions were made.</p>	Yes																																		

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>GSE has established records for all the workers employed. The list stated their full names, employee number, date of birth, date of entry, a job description/station, wage and the period of employment.</p>	Yes
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>All employees are being provided with fair employment contracts in Bahasa Malaysia. All sampled employment contracts were signed by both GSE and the respective workers. Each worker was given a copy of the agreement as confirmed by the workers interviewed. The employment contract contains the following salient provisions:</p> <p>The employment contract contains clauses related to job description, duration of contract, probation period, (6 months for Malaysians and not applicable to foreign workers), retirement age, place of work, workers' obligations, wages, time and working hours, overtime, rest day, annual leave, public holidays, housing facilities, medical leave, maternity leave, insurance coverage, notice of termination, and reasons for termination.</p>	Yes
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	<p>The time recording system available at GSE is via punch card system. A face recognition system which records time in, time out, rest time, etc, is currently on trial and is not fully launched yet and therefore could not be verified</p> <p>For GSE field workers, their attendance are recorded during morning muster. Both systems transparently record the time and out of all employees.</p>	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
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>- Major compliance -</p>	<p>The working hours and breaks of each worker is contained in the employees' employment contracts, which is 8 hours of work for 6 days a week and for every 5 hours of work, workers are to get at least 30 minutes of break.</p> <p>Field workers who are offered to work on rest day, (no compulsory for them for them to accept), will be paid double rate. This was evidenced from the memo issued on 7 July 2020.</p>	Yes
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>- Major compliance -</p>	<p>Wages and overtime payment are clearly detailed out in the sampled pay slips. Payslips for the following GSE workers were observed for October 2019, Jan 2020, March 2020, June 2020:</p> <p>Workers No. E10936, E00813, E10155, E00663, E10847, E00005, E11276.</p> <p>The wages are in line with legal requirements in that it contains records of all income received (basic daily wage, overtime calculation), deductions (EPF, SIPS, SOCSO for local workers, and SOCSO for foreign workers).</p>	Yes
4.4.5.10	<p>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.</p> <p>- Minor compliance -</p>	<p>Among the social benefits offered by GSE to its workers include free housing, free water and electricity, free medical facilities at the Sabapalm Clinic, free education for foreign workers' children at HUMANA, free transportation for school children from the housing to HUMANA, SK Sabapalm & SMK Pamol. School children from Kg Tagas Tagas are also able to obtain the benefits of this arrangement.</p>	Yes
4.4.5.11	<p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in</p>	<p>Estate workers are provided free living quarters with amenities such as subsidised electricity, free treated water, grocery shops, football field, chapel, temple, and mosque, creche, HUMANA school, free</p>	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	<p>compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p>- Major compliance -</p>	<p>medical clinic, takraw and volleyball. Weekly housing inspection 3 July 2020, 22 June 2020, 12 June 2020, 4 June 2020, 18 May 2020, 13 May 2020, 5 May 2020. VMO visits the estate clinic once a month, from Klinik Elopura, Sandakan.</p> <p>Census was conducted in July 2020 at Bengkawat Division for repairs. Budget available via summary of general charges for fiscal year 2020, V01 (1 /1/2020 – 31/12/2020) which identified labourer accommodation budget at RM8295 per month, or RM100,000 p/a.</p>	
4.4.5.12	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>GSE subscribes to Genting Plantations Berhad's published Sexual Harassment Policy published 3 Aug 2009 where the company commits to a harassment-free environment and avoid behaviour that may create an atmosphere of hostility and intimidation of any kind at the workplace.</p>	Yes
4.4.5.13	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>GSE subscribes to Genting Plantation Berhad's People Policy published dated 3 Aug 2009 which states that the Company does not prohibit employees to join any trade unions. Workers' rights to freedom of association and collective bargaining are also contained in Social Policy dated 22 June 2015. GSE was able to demonstrate that it respects the rights of all employees to form or join trade union.</p>	Yes
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult</p>	<p>Based on the list of employees sighted, observations made and interviews with workers, no children and young persons were employed or exploited. All employees are above 18 years old.</p>	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance						
	supervision, and when not interfering with their education programmes. Children shall not expose to hazardous working conditions. - Major compliance -								
Criterion 4.4.6: Training and competency									
4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept. - Major compliance -	The estate has established the training program and documented in Safety and Health Program FY 2020: Estate under section training. The training program was done based on the training need analysis conducted and reviewed on annually basis.	Yes						
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	The estate has conducted the training need analysis to determine the training requirement for the management, employee and contractors and documented in Training Need Analysis, Plan and Implementation 2020. The analysis was conducted on annually basis.	Yes						
4.4.6.3	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. - Minor compliance -	In Sabapalm estate, the staff and workers training need analysis was conducted to determined type of training needed. The record dated 7 Jan 2020 analysis was include sprayer, harvester and manuring. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Date</th> <th>Training</th> </tr> </thead> <tbody> <tr> <td>Estate</td> <td></td> </tr> <tr> <td>11/3/2020</td> <td>Training on HIRARC, PPE, premix SOP and Buffer zone to contractor</td> </tr> </tbody> </table>	Date	Training	Estate		11/3/2020	Training on HIRARC, PPE, premix SOP and Buffer zone to contractor	Yes
Date	Training								
Estate									
11/3/2020	Training on HIRARC, PPE, premix SOP and Buffer zone to contractor								

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings		Compliance
		4/2/2020	Training for sprayer in mature and immature.	
		2/6/2020	Spill kit training	
		13/2/2020	Manuring training	
		9/4/2020	ERP training	
		23/3/2020	Harvesting training	
		7/5/2020	Grading FFB training	
		19/3/2020	Water treatment training	
		Mill		
		18/11/2019	Handling of Tools & equipment/PTW Training	
		1/11/2019	Training Fire Drill, Fire hydrant and First aid	
		18/9/2019	Procedure of Handling new workers new contractor and visitor and induction	
		26/6/2019	ESH Committee member roles Function	
		11/6/2019	Legal & Others requirement, monitoring an evaluation training	
		22/3/2019	Scheduled waste training	
		19/2/2020	Company policy training	
		1/4/2020	Aspect and impact on environment training	
		1/4/2020	Hearing conservation training	

4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services

Criterion 4.5.1: Environmental Management Plan

4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be	Environmental Policy was established, signed by President and Chief Operating Officer on 5th October 2009. Communication of the policy	Yes
----------------	---	--	-----

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	developed, effectively communicated and implemented. - Major compliance -	was delivered in various methods such as display at strategic places, briefing during muster and trainings.	
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. - Major compliance -	Environmental management plan was established dated 13 Jan 2020 at all the visited estates which include environmental policy, aspect impact, protection of HCV areas, Soil erosion, air pollution, water pollution, noise pollution, Soil Pollution, GHG, waste management, water usage, etc. Environmental objectives were established through the management plan, e.g. no open burning, improve efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage and reduce wastage for water consumption etc. This environmental aspect impact already been review dated 10 Sept 2019. Environmental aspect impact assessment was established to include all the activities, e.g. spraying, manuring, harvesting, pruning, EFB application, chemical store activity, internal transport, upkeep & maintenance work, workshop, line site, water catchment pond, HCV, chemical mixing bay, landfill, nursery and etc.	Yes
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance -	Environmental management plan was established at all the visited estates which include environmental policy, aspect impact, protection of HCV areas, air pollution, water pollution, noise pollution, GHG, waste management, water usage and etc. Environmental objectives were established through the management plan, e.g. no open burning, improve efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage and reduce wastage for water consumption etc. This management plan was monitored on monthly basis.	Yes
4.5.1.4	A programme to promote the positive impacts should be included in	Estates visited has established programme to promote the positive	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	<p>the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>impacts was included in the continual improvement plan. The estate has established environmental management plan base on the aspect and impact analysis conducted include the program to promote the positive impacts as follows:</p> <p>Prevent pollution of surface and groundwater by:</p> <ul style="list-style-type: none"> a. Maintaining and restoring appropriate riparian bufferzone along water bodies b. Established water quality monitoring for testing river and domestic water c. Disposal of scrap iron through recycle 	
4.5.1.5	<p>An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.</p> <p>- Major compliance -</p>	<p>Estates visited has included the environmental training in training program established.</p> <p>The estate has established training program which reviewed and updated on annually basis and documented in SOP training program and Safety and Health Program FY 2020: Field. The training that plan was included such as triple rinse for empty container, Chemical spillage training and also prohibition of spraying and manuring activity at buffer zone area. The latest training record was on</p>	Yes
4.5.1.6	<p>Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>Environmental meeting was done on 11 Feb 2020 by management. This meeting conducted annually as per recorded.</p>	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance -	Estates visited monitored the consumption of non-renewable energy on monthly basis. Action plan was established plan to assess the usage of non-renewable energy.	Yes
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets.	Yes
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	No renewable energy been applied in estate.	Yes
Criterion 4.5.3: Waste management and disposal			
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Documented waste management plan was available at Sabapalm Oil Mill and Estate. Among the types of waste identified were scheduled wastes, domestic wastes and recyclable wastes. The scheduled wastes were disposed in accordance to EQA regulations, domestic wastes were landfilled in accordance to procedure and recyclable wastes were delivered to recycle wastes vendors.	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Receipts of recyclable wastes disposal were available for verification, e.g.</p> <ul style="list-style-type: none"> • disposal of empty chemical containers [ref.: used plastic pesticides container recycling (UPPCR) Collection Form by G-Planter dated 3/7/2020] at Sabapalm Estate • disposal of recyclable wastes i.e. carton box [ref.: City Express Recycling Sdn Bhd weighbridge receipt #014391, dated 13/3/2020] <p>With regards to scheduled wastes disposal, the visited operating units have satisfactorily maintained the regulated documents such as notification, inventory records and consignment notes through e-swiss. Among the scheduled wastes generated by the operating units were spent lubricants, spent batteries, contaminated filters & rags, contaminated PPE and clinical wastes to name a few.</p>	
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p>- Major compliance -</p>	<p>Ref.: Sustainability Management Procedure Manual, SMP-GPB-12, rev. 1, dated 1/12/2014. Based on interview and site verification, it was noted that the proper disposal of wastes was understood by the workers and management.</p> <p>The estate has established waste management plan base on the identification and source of pollutions and documented in Waste Management Plan Year 2020 – Industrial (Palm Oil Mill and Estate) the plan were available for review.</p> <p>The estate has established and documented Waste Management Plan for Estate and Mill. Management plan was done base on the type of waste identified in the List of Waste Identified. The plan was reviewed on annually basis. Latest review was conducted on Feb 2020. The plan</p>	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		stated the Issue identified, management action, period of monitoring and person responsible.	
4.5.3.3	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>With regards to scheduled wastes disposal, the visited operating units have satisfactorily maintained the regulated documents such as notification, inventory records and consignment notes through e-swiss. Among the scheduled wastes generated by the operating units were spent lubricants, spent batteries, contaminated filters & rags, contaminated PPE and clinical wastes to name a few.</p> <ul style="list-style-type: none"> disposal of empty chemical containers [ref.: used plastic pesticides container recycling (UPPCR) Collection Form by G-Planter dated 3/7/2020] at Sabapalm Estate disposal of recyclable wastes i.e. carton box [ref.: City Express Recycling Sdn Bhd weighbridge receipt #014391, dated 13/3/2020] 	Yes
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>- Major compliance -</p>	<p>The empty pesticides containers will be triple rinse and punctured and send to licensed contractor for disposal. Empty pesticide containers were triple rinsed and punctured before sent to authorized collector such as G-Planter. The record was available for storage purpose refer Stock/bin card the latest record dated 3/7/2020. Receipt of deliveries were available at the estates for verification.</p>	Yes
4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p>	<p>The Domestic was dispose properly by management. No sighted any Scheduled waste and disposal was done 3 times per week and far from housing area.</p>	Yes
Criterion 4.5.4: Reduction of pollution and emission			

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	Environmental management plan was established at all the visited estates which include environmental policy, aspect impact, protection of HCV areas, air pollution, water pollution, noise pollution, GHG, waste management, water usage and etc. Environmental objectives were established through the management plan, e.g. no open burning, improve efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage and reduce wastage for water consumption etc. This management plan was monitored on monthly basis.	Yes
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	An action plan to reduce identified pollutants was established under name Environmental management plan. Environmental management plan was established at all the visited estates which include environmental policy, aspect impact, protection of HCV areas, air pollution, water pollution, noise pollution, GHG, waste management, water usage and etc. Environmental objectives were established through the management plan, e.g. no open burning, improve efficiency of fertilizer application, improved disposal method, eliminate oil spillage, optimize usage and reduce wastage for water consumption etc. This management plan was monitored on monthly basis.	Yes
Criterion 4.5.5: Natural water resources			
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a. Assessment of water usage and sources of supply.	a. All estate visited already conducted water usage and sources of water supply, this action was under Water management plan dated 13/2/2020. b. The clean water quality is tested quarterly to ensure safety. For example, the latest three analysis reports were available for verification [ref.: W200129/04B (29/1/2020), W190926/01 (24/9/2019) and 20190214/02A (14/2/2019)].	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator	Assessment Findings	Compliance
<p>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.</p> <p>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>	<p>c. Genting Sabapalm Estate has established its water management plan dated 25/2/2020. The objective of the plan is to conserve the potable water. Apart from that, in order to maintain the availability of surface and ground water, water management plan for peat area, flooded area, protection of water courses & wetlands, pollution prevention through establishment of riparian zones and management of water table through installation of water gates.</p> <p>d. Based on site visit, it was observed that 50 m of riparian zone was allocated along Labuk River adjacent to Sabapalm Estate. The existing palms in the zone were not felled during replanting. They were left to nature. This can be seen at Field #7 [5°56'60" N 117°21'35" E].</p> <p>e. No sighted any natural vegetation in riparian areas has been removed.</p> <p>f. In estate, no used bore well as water supply source.</p>	
<p>4.5.5.2 No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p>- Minor compliance -</p>	<p>Sighted during site visit, no construction of bunds, weirs and dams across main rivers through in all sampling estate.</p>	<p>Yes</p>
<p>4.5.5.3 Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).</p> <p>- Minor compliance -</p>	<p>The practice water harvesting of water from road-side drains being directed and stored in conservation road side pits was observed in both estates.</p>	<p>Yes</p>

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			
<p>4.5.6.1</p>	<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> <ul style="list-style-type: none"> a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. <p>- Major compliance -</p>	<p>Genting Plantation has conducted HCV assessment for Genting Sabapalm POM and Genting Sabapalm Estate and documented in Inventory on HCV sites within Genting Plantation Bhd group estates (Sabah Region 1) by S.K. Yap Forestry and Landscape Advisory Services on Oct 2009 – July 2010. Only HCV 4.2, Labuk River and Bengkawat River and HCV 6, burial grounds for local communities within were identified in GSPE during the assessment.</p>	<p>Yes</p>
<p>4.5.6.2</p>	<p>If rare, threatened or endangered species or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <ul style="list-style-type: none"> a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. <p>- Major compliance -</p>	<p>For awareness to stakeholder regarding to HCV and endangered, rare and threaten species was conducted during stakeholder meeting latest record was on 10/3/2020. For workers, training been given by management pertaining to policy and HCV dated 4/2/2020 attended by all workers and staff.</p>	<p>Yes</p>

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. - Major compliance -	Management has been established and documented in Biodiversity Management Plan. In the management plan stated the Biodiversity Areas Identified, Management Action, Monitoring and Indicators, PIC, Timeline and status. Sighted the implementation as follows: i. The estate communicated on the prohibition illegal or inappropriate hunting, fishing or collecting activities to the employee and stakeholders through training, muster briefing and erecting signage at the estate entrance.	Yes
Criterion 4.5.7: Zero burning practices			
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -	There was no trace of fire used for waste disposal and for preparing land for oil palm cultivation or replanting observed at all the visited estates.	Yes
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance -	Not applicable as fire was not used for any field operations.	Yes
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	Not applicable as fire was not used for any field operations.	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.5.7.4	<p>Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.</p> <p>- Minor compliance -</p>	Based on visits at the replanting areas, previous crops were observed to be felled, chipped and windrowed. No trace of burning observed.	Yes
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>GSE was not able to demonstrate that it consistently implements its Standard Operating Procedures.</p> <p>Section 6.8.2 Procedure of Social Management (Doc. No. SMP-GPB-32, Rev. 00 dated 18 Jan 2018 states that Workers Committee Meetings shall be conducted at least quarterly or whenever necessary. However, records show that the Workers' Committee Meetings at the GSE were held on 18 June 2019 and 14 Feb 2020.</p> <p>Therefore, a Major Non-Compliance was issued.</p>	No
4.6.1.2	<p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p>- Major compliance -</p>	Genting Plantations Berhad has developed Steep Land Management Procedure with Doc. No. SMP-GPB-10, Rev. 0 and Soil Conservation and Terracing SOP with Doc. No. OPM 4, Rev. June 2013. Seen the Slope map with GIS Date Processed: 19/6/2013 of Genting Seri Gading Estate as below;	Yes
4.6.1.3	A visual identification or reference system shall be established for	All Estates visited had a visual identification/reference system for each established field/block and maps established. Field numbers and	Yes

Criterion / Indicator		Assessment Findings	Compliance												
	each field. - Major compliance -	hectare were marked on palms and in some areas on concrete slaps and some using board for identification for each block.													
Criterion 4.6.2: Economic and financial viability plan															
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	The estates visited has established 10 years business plan and documented in 10 years production, expenditure and profit/loss projection. 2019 – 2028. In the management plans stated: i. Hectare statement ii. FFB production iii. FFB purchase iv. FFB, CPO and PK dispatch v. Production cost vi. Yield and area statement	Yes												
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance -	The estates visited has established 5 years replanting program base on the palm age with consideration of yield and terrain. Sighted the sampled replanting program as follows <table border="1"> <thead> <tr> <th>Years</th> <th>Replanting (Ha)</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>290.99 (29A,23,12,13,16,17,18,29,9)</td> </tr> <tr> <td>2022</td> <td>200.79 (11,10,14,15,K5,K6)</td> </tr> <tr> <td>2023</td> <td>174.74 (103A,22,24,30,31)</td> </tr> <tr> <td>2024</td> <td>119.89 (28,42,38B,43,44)</td> </tr> <tr> <td>2025</td> <td>105.46 (72,73,74,75,45)</td> </tr> </tbody> </table>	Years	Replanting (Ha)	2020	290.99 (29A,23,12,13,16,17,18,29,9)	2022	200.79 (11,10,14,15,K5,K6)	2023	174.74 (103A,22,24,30,31)	2024	119.89 (28,42,38B,43,44)	2025	105.46 (72,73,74,75,45)	Yes
Years	Replanting (Ha)														
2020	290.99 (29A,23,12,13,16,17,18,29,9)														
2022	200.79 (11,10,14,15,K5,K6)														
2023	174.74 (103A,22,24,30,31)														
2024	119.89 (28,42,38B,43,44)														
2025	105.46 (72,73,74,75,45)														

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance		
		<table border="1"> <tr> <td>Total</td> <td>891.87</td> </tr> </table>	Total	891.87	
Total	891.87				
4.6.2.3	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment <p>- Major compliance -</p>	<p>The estates visited has established 10 years business plan as guidance for the estate to conduct the daily operation and expenditure. The business plan was documented in 10 years production, expenditure and profit/loss projection 2019 – 2028. Items stated in the business plan as follows:</p> <ul style="list-style-type: none"> i. Hectare statement ii. FFB yield/ha and Total Production by age iii. FFB Production and FFB purchase (FFB, CPO, PK, OER, KER) iv. Production cost v. Cost/ha and Cost/tons vi. Dispatch (CPO and PK) <p>The capital expenditure was documented in Financial Year Projected Capital Expenditure (CAPEX).</p>	Yes		
4.6.2.4	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p> <p>- Major compliance -</p>	<p>The business management plan were reviewed by the Chief Operating Officer during his visit on quarterly basis. The management will have meetings from time to time to monitor the work progress against annual programme to ensure the budget is not overrun.</p>	Yes		
<p>Criterion 4.6.3: Transparent and fair price dealing</p>					

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Review during the audit were FFB transporter agreements valid from 1 Jan 2020 to 31 Dec 2022 between Genting Plantations Berhad and Hon Kim Enterprise and Sykt Tan Hong Transport, both dated 1 Jan 2020 to 31 Dec 2022. Based on the review of these agreements, evidence is available that the price mechanisms for the services are clearly stipulated. Interviews with the contractors also confirmed their understanding of the stipulated pricing mechanism.	Yes
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	A review of the FFB transportation agreements between Genting Plantation Berhad with Hon Kim Enterprise and Sykt Tan Hong Transport shows that the terms are fair, legal and transparent. It contains rights and obligations of both parties, payment terms, contract duration of 3 years, mutual termination clause and reasons for termination. Interviews with the contractors confirmed that payments are made in a timely manner.	Yes
Criterion 4.6.4: Contractor			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	Evidence is available that contractors understand MSPO requirements. Briefings on MSPO requirements were made during Stakeholder Meeting on 10 March 2020. Additionally, Clause 2.3 of the FFB transport agreement also states that the contractors shall comply with the MSPO requirements.	Yes
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Evidence of agreed contracts are available between Genting Plantations Berhad and Hon Kim Enterprise and Sykt Tan Hong Transport, both dated 1 Jan 2020. Both agreements were made available during the audit.	Yes

MSP0 Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.6.4.3	The management shall accept MSP0 approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	Clause 2.3 of the FFB transport agreement states that the contractor would comply with MSP0 requirements, and under clause 3.5 agree to submit to the estate manager all relevant information relevant to RSPO certifications. During the audit, contractors provided cooperation to the auditors.	Yes
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	Control points applicable being observed by estate management as per sighted sample agreements. Evidence of agreed contracts are available between Genting Plantations Berhad and Hon Kim Enterprise and Sykt Tan Hong Transport, both dated 1 Jan 2020.	Yes
4.7 Principle 7: Development of new planting (Not Applicable)			

B) MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills.

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	Genting Plantation has established MSPO Policy signed by the President and Chief Operating Officer dated 18/3/2014	Yes
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	The established policy has emphasized on the commitment to continual Improvement within the journey towards achieving sustainable palm oil.	Yes
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Internal Audit procedure is available under SMPM (sustainability management procedure manual), entitled "Sustainability Internal Audit" document no SMP-GPB-03, rev. 4, dated 13-14 Jan 2020. Among the contents covered in the procedure are audit criteria, audit schedule, audit plan, responsibility of lead auditor & auditee and audit report, which to be kept for 10 years. Internal audit implemented based on Sustainability MSPO Procedure Title: Internal Audit plan; Date: 18 March 2020. For the audit as following: Sabapalm POM Internal audit – 18/3/2020 NCR – 2 NC, close on 25/6/2020.	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Genting Plantation has established the SOP for internal audit and documented in Sustainability Management Procedure Manual under section Sustainability Internal Audit. Refer document no. SMP-GPB-03. The procedure was mentioned about the audit criteria, audit plan, the role of Lead Auditor, Team member and etc. Corrective action plan has been developed with root cause and preventive action of the non-conformities identified.	Yes
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The mill keep records for all internal audit conducted and action taken for review. Sighted the internal audit report dated 18/3/2020 was available the record	Yes
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	In Sabapalm POM management review available as RSPO & MSPO Part3 and Part 4 Management Review Meeting; The management review meeting conducted on 25 June 2020. The discussion was include the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO. Procedure Manual under section Management Review refer document no SMP-GPB-06 rev 1 dated 25/5/2018.	Yes
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	The continual improvement plan covered Environmental, Safety and Social as per below:- 1. Waste reduction 2. Pollution and greenhouse gas 3. Social 4. Encourage optimizing the yield of the supply base	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		5. Water consumption and water quality and Safety and health performance	
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	No new system establish to improves practices. Continual improvement is demonstrated based on project initiated by mill management. The project focus mainly on cost saving and process losses minimization for each financial year.	Yes
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	The management communicates adequate information to other stakeholders on environmental, social and legal issues as evidenced during the joint stakeholder meeting held on 10 March 2020. The briefing was conducted by the Assistant Manager, GSE and Genting Plantations Berhad’s Sustainability Manager. Among the contents of the briefing include HCV, MSPO, RSPO requirements as well as changes to the legal requirement. In addition, the Mill also has written to its stakeholders on the documents available for review. Sighted was a letter dated 30 June 2020 to IOI Edible Oils Sdn Bhd which details out procedure which allows for stakeholders to view the following documents at Genting Sabapalm Estate office: land titles, map, boundary markers company policies HCV, EIA and SIA reports	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		RSPO, MSPO reports Fire prevention plan Continuous improvement plan Complaints and grievance procedure Complaints and grievance book Negotiation and compensation procedure Sexual harassment complaints procedure	
4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance -	The above mentioned documents are publicly available at GSOM office which was verified and reviewed during the audit. Any request of information shall be recorded in GSOM's Enquiry Register Book. As of the date of this audit, there is no record of any request for information from any stakeholders.	Yes
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	An SOP for consultation and communication has been established and documented. It is contained in Sustainability Management Procedure Manual under section Procedures for Consultation and Communication, Document No. SMP-GPB-17, rev. 02 dated 23 Feb 2018.	Yes
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	The management official responsible is GSOM's Sustainability Coordinator appointed via letter dated 1 Jan 2018.	Yes
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders	The Stakeholder List for GSOM was updated up to June 2020 which contain list of stakeholders such as contractors, suppliers, smallholders,	No

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	shall be properly maintained. - Major compliance -	neighbouring estates and businesses, government agencies, clinics, schools, local communities, NGO, etc. The list also contains details of the stakeholder such as their names, nominated representatives and their designation, addresses and contact numbers. However, the Timbalan Pengarah Pegawai Imigresen who was named as the nominated representative of the Sandakan Immigration Office has retired, and this change has not been updated. Additionally, as of June 2020, a total of 18 Indonesian migrant workers are employed by GSOM. However, the Indonesian Consulate office and Philippines Embassy are not listed as stakeholders in GSOM's Stakeholder list. Therefore, a Major Non-Compliance was issued.	
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance -	Traceability requirements established as SOP for Products Traceability Title: Sustainability Management Procedure Manual under section Supply Chain and Traceability (mill). Refer document no. SMP-GBP-23 rev. 7 dated 24/8/2018.	Yes
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Regular inspections conducted by management including internal audit; Internal audit by Sustainability Team dated 24/1/2020.	Yes
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system.	Appointment was made as following Sabapalm POM: MSPO Committee Traceability Officer; Siti Sasijelah dan Junaidah	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	Subala (Weighbridge Clerk); Date: 3/1/2019.	
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	<p>Records of sales, delivery/transportation maintained as per following samples:</p> <p>Input:</p> <p>Sampled the weighbridge ticket as below:</p> <p>Weighbridge ticket: FFB20007687W</p> <p>Supplier: Genting Sabapalm Estate</p> <p>Transporter: HK13</p> <p>Product: Fresh Fruit Bunch</p> <p>Contract: -</p> <p>Nett weight: 9,650 kg</p> <p>Date: 8/6/2020</p> <p>External FFB input:</p> <p>Weighbridge ticket: FFB20008771W</p> <p>Supplier: PL SXXXX Snd Bhd</p> <p>Transporter: SS8979U</p> <p>Product: Fresh Fruit Bunch</p> <p>Date: 27/6/2020</p>	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Nett weight: 28.22mt</p> <p>Out put:</p> <p>Weighbridge Ticket: 041819</p> <p>Product: CPO</p> <p>Customer: XXXX</p> <p>Vehicle No: SAB4512N</p> <p>Contract No: SSD/0320/S01CPO</p> <p>Nett weight: 27,510kg</p> <p>Date: 20/03/2020</p> <p>Weighbridge Ticket: PKMB20000028W</p> <p>Product: PK</p> <p>Customer: XXXX</p> <p>Vehicle No: SS150W</p> <p>Contract No: SSD/0520/S02PK</p> <p>Nett weight: 30,160kg</p> <p>Date: 19/05/2020</p>	

4.3 Principle 3: Compliance to legal requirements

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.3.1 – Regulatory requirements			
<p>4.3.1.1</p>	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>Genting Sabapalm Palm Oil Mill continued to comply with legal Requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team.</p> <p>The licenses and permits governed by the Local, State and Federal authorities among others as shown below;</p> <ol style="list-style-type: none"> 1. Weighbridge certificate by Metrology Corporation Malaysia under no B1200052 and B1200051 valid until dated 14/7/2020 2. Power Generation License 2019/03201 valid until 31/12/2020 3. MPOB license 500002-804000 valid until 31/10/2020 4. Jadual Pematuhan (001878) ASSH(B)31/152000/014 valid from 29/3/2019 until 30/6/2020. 5. PPDNKK.SDK>198/1979(SK) license S000600 for Diesel, valid until 14 March 2021 6. Fire certificate renewal still in progress as per letter JBPM/SB/ZSD:700-3/1/7-36(54) dated 27 May 2020, this Bomba permission was valid until 26 May 2021 (JBPM: SB/7/55/2020 7. Boiler No 3. License (AS.SH; (B)31/152/00/014) 8. Medical surveillance was done annually as per recommendation by CHRA assessor, latest record was on 15 August 2019 with total 12workers attend by DR Sanjay (HQ/18/DOC/00/00201) DAB OH Sdn Bhd. The result showed all workers who underwent MS fit to work in work unit handling chemicals. 	<p>Yes</p>

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<p>9. Hearing conservation training conducted on 1 April 2019 by manager mill Mr Yee Chee Fui.</p> <p>10. Boundary Noise monitoring report in Sabapalm Mill by Sherman Services & Supply dated of monitoring 18-19 Feb 2019. The result was meet the requirement as specific by the Planning Guidelines for Environmental Noise Limits and Control 2004.</p> <p>11. Air receiver SB PMT9418 (license no. PMT-SB/19 25797) valid until 5/8/2020</p>	
4.3.1.2	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>Applicable legal requirements listed as Register of Laws and List of Relevant Act, Laws and Regulations; SMP-GPB-22 as per sample sighted:</p> <p>- Legal Registry for Financial Year 2020 (Sabapalm POM); Date: 30/4/2020</p>	Yes
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>The Sustainability Department SD, based Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills. SD which is based in Wisma Genting is responsible for tracking any changes to the Acts and Regulations. In addition, the SVP Processing (Malaysia) & Downstream Manufacturing also played a role in disseminating new Acts & Regulations to all the mills in the Group.</p> <p>a) This was made via communication with the publisher of the documents.</p> <p>b) This mechanism was outlined in its procedure.</p> <p>c) The updating of the legal register is made on a periodical basis.</p>	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance						
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - Minor compliance -	Management assigned either Mill Engineers or Chief Clerks as person responsible to monitor compliance and tracking/updating changes in legal requirements. Sighted sample letter of appointment as following: In Sabapalm Mill management already appoint Jude Maxwell Sylvester dated 1 Jan 2018.	Yes						
Criterion 4.3.2 – Lands use rights									
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	GSOM has a total area of 13.62 ha comprising mill site, labour quarters, and ponds, all of which are located within the Sabapalm Estate lease title no 085319231. As of the date of this audit, there is no evidence of any land dispute Genting Sabapalm certification unit. This was based on documentation review and also confirmed during audit interviews with the local community from Kg Tagas Tagas.	Yes						
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	GSOM has a total area of 13.62 ha comprising mill site, labour quarters, and ponds, all of which are located within the GSE lease no 085319231. Documents showing legal lease are available. Issuance of lease was made by the Director of Land and Surveys on behalf of the Government of Sabah to Sabah Devt Co Sdn Bhd specified for the purpose of oil palm cultivation. Sampled during the audit were the following documents: <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Title No. Lease</th> <th>Hectarage</th> <th>Period of lease</th> </tr> </thead> <tbody> <tr> <td>085319231</td> <td>283</td> <td>98 years from 01.01.1987 – 31.12.2085</td> </tr> </tbody> </table>	Title No. Lease	Hectarage	Period of lease	085319231	283	98 years from 01.01.1987 – 31.12.2085	Yes
Title No. Lease	Hectarage	Period of lease							
085319231	283	98 years from 01.01.1987 – 31.12.2085							
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The mills visited were located in the sister estate (Sabapalm Estate) Mill boundary were demarcated with fences.	Yes						

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	The land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal leases. Based on documentation review, interviews with local communities, there is no evidence of any legal, customary or user rights of other users on GSOM premises.	Yes
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	The land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal leases. Based on documentation review, interviews with local communities, there is no evidence of any legal, customary or user rights of other users on GSOM premises.	Yes
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	The land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal leases. Based on documentation review, interviews with local communities, there is no evidence of any legal, customary or user rights of other users on GSOM premises.	Yes
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	The land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal leases. Based on documentation review, interviews with local communities, there is no evidence of any legal, customary or user rights of other users on GSOM premises.	Yes
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
<p>4.4.1.1</p>	<p>Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.</p> <p>- Minor compliance -</p>	<p>The Genting Sabapalm unit of certification has carried out a Social Impact Assessment & Human Rights Impact Assessment. The findings are contained in Report for Genting Sabapalm Estate and Genting Sabapalm Oil Mill 19th – 21st June 2019 3rd revision. This report was prepared by the Sustainability Department dated August 2019. There is evidence that the SIA and Human Rights Impact Assessments were carried out with the participation of affected stakeholders as evidenced from pictorial evidence, report contents, and confirmed by stakeholders during audit interviews. Those consulted were both foreign and local workers, contractors, villagers, and government officers. The findings were tabulated and contain both positive and negative comments.</p> <p>Among the positive comments include good relationship and continuous communications between the estate and mill with SK Tagas Tagas, supply of treated water during the draught season, patching of common road leading to the school, supply of water to the school and nearby villages, transparent FFB prices, clear border demarcation and no land disputes with the local community, and job opportunities to the nearby villagers.</p> <p>Among the negative comments include speeding motorists in front of the school, foreign workers refusing to go for medical check-ups during pregnancy, unsatisfactory attendance at HUMANA school, attendance not satisfactory, and issue of speeding motorists in front of school.</p>	<p>Yes</p>

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		The SIA has also identified the issue of undocumented dependants among estate and mill foreign workers, and foreign workers' lack of understanding of the process/procedure for applying birth certificates for foreign children. Among the action plan identified include providing clear information to the workers' representatives on the procedures of registering foreign workers' dependants.	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	A complaints and grievance procedure has been established and documented and is available in Doc No. SMP-GPB-19 Rev 04 issue date March 2020.	Yes
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	The complaints and grievance procedure contained in Doc No. SMP-GPB-19 Rev 04 issue date March 2020 states that the time frame for resolving the complaint would depend on the seriousness of the said grievance or complaint, and that the accepted timeframe to respond is within one month of receipt of the complaint or grievance.	Yes
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	Complaint forms are made available at the GSOM office in the form of Complaints/Grievance Record Book. Sighted during the audit was the complaints/grievances received via letter dated 18 June 2019 from Majlis Pengurusan Komuniti Kampong. The complaint was pertaining to alleged speeding of CPO and PK tankers along the village road. The last complaint received from the workers was on 15 Feb 2019 related to defective toilet door lock.	Yes
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.	The employees were made aware of the complaints procedure during Workers' Committee Meetings which were held GSOM on 6 March 2020	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	and 8 Oct 2019. The surrounding communities were made aware of the procedure during stakeholder meetings on 10 March 2020.	
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	Based on the Complaints /Grievances Record Book, complaints and solutions within the past 24 months were being documented and are available to affected stakeholders upon request. So far there has been no such request from the stakeholders.	Yes
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance -	Evidence is available that contributions to community development are being made. This is a joint effort between GSOM and GSE as GSOM is an integral part of GSE. Based on audit interviews with affected stakeholders and review of documents, the following contributions were made: <ul style="list-style-type: none"> - Potable water for workers of Styland Estate (neighbouring estate); - Potable water for villagers of Kg Lumantik; - Replacing old and unsafe chairs and tables at SK Ladang Sabapalm; - 30 chairs and 6 cans of paint; - General maintenance and repair services to SK Ladang Sabapalm; - Free electricity and treated water to SK Ladang Sabapalm; - Estate accommodation to 7 teachers from SK Ladang Sabapalm; Job opportunities to the local community.	Yes
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and	Sabapalm Oil Mill has established Safety and Health Policy signed the President /Chief Operating Procedure dated 01/7/18.	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	<p>Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>In the policy stated the commitment to comply with the Occupational Safety and Health Act 1994 and Factory and Machinery Act 1967 towards achieving zero incidences.</p> <p>The mill has established the safety and health plan and documented in Safety and Health Program for the Year 2019: Mill. The program divided into General, workplace inspection, training program, safety, health and environment, emergency response plan, vehicle safety, OSH reporting/evaluation and OSH training/seminars/course. Already been communicated on 3/2/2020 by Management during morning master.</p>	
4.4.4.2	<p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health 	<p>Briefings to employees on safety policy are made through training and briefing forums. In addition there were also briefings at muster ground being as refresher program for the employees. Safety procedures adherence are emphasised to the employees as part of the work culture. Content includes among others to prioritise safety, execute work safely, and adhere all safety rules and regulations and to target zero accident. Safety policy and targets were available on display board printed in both English & Bahasa Malaysia.</p> <ul style="list-style-type: none"> a) Sabapalm Oil Mill has established Safety and Health Policy signed the President /Chief Operating Procedure dated 01/7/18. The policy was communicated through tool box meeting, morning muster briefing and displayed at several designated notice board in the mill. Noted during interview with the workers shows the understanding on the Safety and Health Policy among the workers. b) The chemical hazard risk assessment (CHRA) available for review. Latest was done on 14 May 2015 by Envosha Sdn Bhd (JKKP HIE 127/171-2(160)). HIRARC review was done periodically or when accident happen. Latest record was dated 21/2/2020. 	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator	Assessment Findings	Compliance
<p>(Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>c) The awareness training program for employee exposed to chemicals has been included in the training program established. The training programme was by individual base. Latest updated was on 4 June 2020.</p> <p>d) Sabapalm POM has provided all PPE to all the workers base on job type and designation following the HIRARC and the Occupational Safety and Health Manual for Plantation Workers.</p> <p>e) Genting Sabapalm POM has established SOP for chemical handling and documented in and the Occupational Safety and Health Manual for Plantation Workers. Refer SOP GSOM-SOP-LAB-01 until 03 dated 30 Nov 2011.</p> <p>f) Genting Sabapalm POM Manager has appointed the chairman of OSH committee as per Memorandum date 13 February 2019 signed by the Vice president Sabah.</p> <p>g) For Sabapalm POM, latest record was on 1 June 2020, sighted no record of accident dated.</p> <p>h) Sabapalm POM has established Standard Operating Procedure for accident and emergency and documented in Emergency Response Plan (Pelan Tindakan Kecemasan); SP-MGR-04; rev 01; dated 1 August 2017. The training regarding ERP been conducted on 13 Feb 2020.</p> <p>i) The First aid training was conducted accordingly in Mill. Dated 1 Nov 2019. All first aider was attended the training and understand as per interview verification.</p> <p>j) The JKKP 8 record was available, JKKP 8/44132/2019 delivered to DOSH on 8/1/2020. One accident happen in Mill. One accident record for Sabapalm POM regarding cages area with 60 Day MC. (accident</p>	

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		date 12/6/2019) HIRARC review was on 14/6/2019. SOCSO claim on 13/08/2019.	
Criterion 4.4.5: Employment conditions			
4.4.5.1	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees. - Major compliance -	GSOM subscribes to the Genting Plantations Berhad’s People Policy dated 3 August 2009. The People Policy states the Group’s commitment to not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation. The Policy also states that no one shall be denied their rights to equal opportunities. These Policies are publicly displayed at all main notice boards within the premises.	Yes
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	GSOM subscribes to Genting Plantations Berhad’s People Policy dated 3 August 2009. The People Policy states the Group’s commitment to not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation. The Policy also states that no one shall be denied their rights to equal opportunities. These Policies are publicly displayed at all main notice boards within the premises.	Yes
4.4.5.3	Management shall ensure that employees’ pay and conditions meet legal or industry minimum standards as per Collective Agreements.	Based on the employment contracts and pay slip, there is evidence that GSOM employees were paid at least minimum wages of RM42.31 per day, or RM1,100 per month. This is in accordance with the Minimum	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	<p>The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>Wages (Amendment) Order 2020. Workers also received minimum wages of RM1,100 despite GSOM not operating on certain days during the recent mandatory Covid-19 lockdown.</p>	
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>GSOM is able to demonstrate that contractors' employees are paid based on legal or industry minimum standard. This is based on the CPO & PK Transport Agreement Addendum on RSPO, MSPO, SCC & OSHA 1994. This document is signed between Genting SDC Sdn Bhd with Landasan Kembar Sdn Bhd and Juita Baru Sdn Bhd. The Addendum states among others, that The Transporter shall ensure all his employees are provided with fair legal contracts. Payment records also show that the workers of Landasan Kembar were paid more than the minimum wages of RM1,100 per month.</p>	Yes
4.4.5.5	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The Mill management has established records for all the workers Employed. The list stated the full names, employee no., gender, date of birth, date of entry, a job description/station, wage and the period of employment.</p>	Yes
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 shall be made available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>All employees are being provided with fair employment contracts in Bahasa Malaysia. All sampled employment contracts were signed by both the workers and GSOM, and each worker was given a copy of the agreement. This was also confirmed by the workers interviewed. The employment contract contains the following salient provisions:</p> <p>The employment contract contains clauses related to job description, duration of contract, probation period, (6 months for Malaysians and not</p>	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		applicable to foreign workers), retirement age, place of work, workers' obligations, wages, time and working hours, overtime, rest day, annual leave, public holidays, housing facilities, medical leave, maternity leave, insurance coverage, notice of termination, and reasons for termination.	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	The time recording system available at GSOM is via the electronic thumb print system. However, recently during the Covid-19 outbreak, this system was put on hold and GSOM reverted to the punch card system. The electronic thumb print system transparently records employee's name and ID, date, time in, time break taken, time break resumed, overtime hours of work, normal hours of work. Sampled during the audit was the print out of the thumb print system for Feb 2020.	Yes
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. - Major compliance -	The working hours and breaks of each worker is contained in the employees' employment contracts, which is 8 hours of work for 6 days a week and for every 5 hours of work, workers are to get at least 30 minutes of break. However, overtime for the following GSOM workers were carried out without complying with the conditions under paragraph 1.2 of the Permit issued by the Sabah Labour Office dated 18 May 2018 (Serial No. 600-1/2/13/9 (08/SDK/2018-0172). Paragraph 1.2 of the permit states that written consent from the worker is needed if they are required to do overtime exceeding 104 hours. However, for the following workers, no written consent was obtained:	No

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings			Compliance
		Worker No	Maximum hours per month	Month/Year	
		E00011	106 hours	March 2020	
		E00027	112.5 hours	March 2020	
		E00230	118.5 hours	March 2020	
		E00286	111.5 hours	June 2020	
		E00294	104.5 hours	Oct 2019	
		E00309	105 hours	Oct 2019	
		Therefore, a Major Non-Compliance was raised.			
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 -	Wages and overtime payment are clearly detailed out in the sampled pay slips. Payslips for the following GSOM workers were observed for October 2019, Jan 2020, March 2020, June 2020: Workers No. E00011, E00027, E00230, E00286, E00294, and E00309. The wages are in line with legal requirements in that it contains records of all income received (basic daily wage, overtime calculation), deductions (EPF, SIPS, SOCSO for local workers, and SOCSO for foreign workers).			Yes
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	Among the social benefits offered by GSOM to its workers include free housing, free water and electricity, free medical facilities at the Sabapalm Clinic, free education for foreign workers' children at HUMANA, free transportation for school children from the housing to			Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	development, medical care provisions and improvement of social surroundings. - Minor compliance -	HUMANA, SK Sabapalm & SMK Pamol. School children from Kg Tagas Tagas are also able to obtain the benefits of this arrangement.	
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 -	<p>Visit to GSOM Mill workers' linesite confirmed that the newly constructed houses are new, habitable and have basic amenities such as free treated water and electricity, community hall, football field, clinic, grocery shop, school, and places of worship for Muslims, Buddhists and Christians. Some workers are still living in the old wooden accommodation. However, GSOM is in the process of building additional 4 blocks (comprising 16 units) targeted to complete by early 2021. Sighted during the audit were:</p> <ul style="list-style-type: none"> - Letter of acceptance by building contractor Bunga Suara Enterprise dated 17 July 2019 (for 1 block); - Letter of acceptance by building contractor Bunga Suara Enterprise dated 26 Dec 2019 (for 2 blocks); and - Purchase Requisition Details dated 30 Dec 2018 (for 1 block). 	Yes.
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	GSOM subscribes to Genting Plantations Berhad's Sexual Harassment Policy dated 3 Aug 2009 where the company commits to a harassment-free environment and avoid behaviour that may create an atmosphere of hostility and intimidation of any kind at the workplace.	Yes
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and	GSOM subscribes to Genting Plantation Berhad's People Policy dated 3 Aug 2009 states that the Company does not prohibit employees to join any trade unions. Workers' rights to freedom of association and collective bargaining are also contained in Social Policy dated 22 June 2015. GSOM was able to demonstrate that it respects the rights of all employees to form or join trade union. Also contained in the Minutes of	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	the GSOM's Workers' Committee meeting that workers are allowed to join trade union of their choice.	
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. - Major compliance -	Based on the list of employees sighted, observations made and interviews with workers, no children and young persons were employed or exploited. All employees are above 18 years old.	Yes
Criterion 4.4.6: Training and competency			
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance -	The mill has established the training program and documented in Safety and Health Program FY 2020: Mill under section training. The training program was done based on the training need analysis conducted and reviewed on annually basis.	Yes
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	The mill has conducted the training need analysis to determine the training requirement for the management, employee and contractors and documented in Training Need Analysis, Plan and Implementation 2020. The analysis was conducted on annually basis.	Yes
4.4.6.3	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure. - Minor compliance -	The estates visited has established training program which reviewed and updated on annually basis and documented in SOP training program and Safety and Health Program FY 2019: Field. Training record:- Handling of Tools & equipment/PTW Training on 18/11/2019	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Training Fire Drill, Fire hydrant and First aid on 1/11/2019</p> <p>Procedure of Handling new workers new contractor and visitor and induction dated 18/9/2019</p> <p>ESH Committee member roles Function 26/6/2019</p> <p>Legal & Others requirement, monitoring an evaluation training dated 11/6/2019</p> <p>Scheduled waste training was on 22/3/2019</p> <p>Company policy training on 19/2/2019</p> <p>Aspect and impact on environment training on 1/4/2019</p> <p>Hearing conservation training on 1/4/2019</p>	
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	<p>An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Sabapalm POM has established the Environmental Policy signed by the Executive Chairman dated 2/1/2019. The policy stated the Company commitment in protecting the environment and ensure necessary effort is taken to reduce the impact on the environment from the estates and mill operation in line with EQA 1974 and other applicable laws and regulations. The policy was communicated to the employee through training, tool box meeting and displayed at the designated notice board in the mill.</p>	Yes
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p>	<p>The mill has conducted the aspects and impacts analysis of all operations and documented in the Environmental Aspect Impact Assessment Guidance for Palm Oil Mill. The mill has established environmental</p>	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	<p>b) The aspects and impacts analysis of all operations</p> <p>- Major compliance -</p>	<p>management plan base on the aspect and impact analysis conducted. The management plan was reviewed on annually basis. Latest review was conducted on 13/5/2020.</p> <p>Sighted the implementation of the management plan as follows:</p> <p>Other significant pollutant identified is the smoke emission from boiler operation. The mill currently is using multi-stage dust cyclone to minimise the pollutant. Monitoring of quality is done through regular stack sampling. Verification of the stack sampling reports [ref.: report # MS/GSOM/2019/BOILER NO. 3(S3)-2ND HALF, dated 15/9/2019 and RT003/2020/010, dated 10/3/2020 showed that the mill did not comply with the regulated limit which is 150 mg/m³. Nonetheless, the mill has been granted with contravene license [license no. 005230, validity 3/9/2019 to 3/9/2020] by the DOE. In order to comply the regulated limit, the mill is in the midst of getting its electrostatic precipitation (ESP) to be commenced which is expected to be at the end of the year.</p>	
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p>- Major compliance -</p>	<p>The mills visited has established the environmental plan based on the aspects and impacts analysis conducted and documented in the Environmental Aspect Impact Assessment for Mill. The management plan was established for the activity which give significant impact for the environment. The management plan were reviewed annually basis.</p>	Yes
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>The mill has established environmental management plan base on the aspect and impact analysis conducted include the program to promote the positive impacts as follows:</p> <ul style="list-style-type: none"> i. Mulching EFB within estate ii. Disposal of boiler ash and decanter solid within estate iii. Parameter of final discharge POME within limit 	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		iv. Provide transparent information about quality of environment to stakeholder v. Shell and fibre wastes are used as fuel for steam production	
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - Major compliance -	The Mill has established the training program documented in the Safety and Health Program FY 2020 and Environmental Planner FY 2020. The training plan was reviewed on annually basis.	Yes
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	Environmental Performance Monitoring Committee (EPMC) meeting conducted on 26/6/2019. The meeting attended by management and workers representative to discuss about the environmental quality. For Environmental Regulatory and compliance Monitoring Committee (ERCMC) meeting was done on 8 August 2019.	Yes
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period - Major compliance -	The mills visited monitored the consumption of the non-renewable energy on monthly basis. The monitoring was done base on the type of the energy usage. The mills has established plan to assess the usage of non renewable energy and documented in the Energy optimization Plan. The plan stated the issue, action plan, person responsible, timeline and status of the implementation. Sighted the sample monitoring records for diesel usage and turbine FY 2020 as follows:	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Fossil fuel was most consumed at the engine room where the average consumption is 2.24 lt/mt FFB. Since May 2020, the mill has been using electricity supplied by SESB. Thereafter, the average consumption as at June 2020 has declined to 0.196 lt/mt FFB. The data is documented in the mill's monthly diesel consumption record.</p> <p>Monitoring of diesel fuel consumption was done by all the visited operating units. The data was then used for GHG calculating by using the RSPO GHG Calculator.</p>	
4.5.2.2	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p>- Major compliance -</p>	<p>The estimate for the direct usage of nonrenewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets.</p>	Yes
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p>	<p>From the monitoring and interview with the management, the mill consume the shell and fiber as boiler fuel.</p>	Yes
Criterion 4.5.3: Waste management and disposal			
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>The mill has identified all waste and source of pollution and documented in the List of Waste Identified. The list was reviewed on annually basis. The latest review was done on 25 June 2020. The waste identified as follows:</p> <ul style="list-style-type: none"> i. Industrial waste – Scrap Iron ii. Scheduled Waste – SW110, SW 305, SW409, SW410 	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<p>iii. Domestic Waste – Wet waste, kitchen waste, garden waste, sanitary waste, dry waste</p> <p>iv. Solid waste – EFB, Shell, Boiler Ash, Decanter Solid</p>	
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.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p>- Major compliance -</p>	<p>The mill has established and documented Landfill and Domestic waste management for Estate and Mill. Management plan was done base on the type of waste identified in the List of Waste Identified. The plan was reviewed on annually basis. Latest review was conducted on 25 June 2020. The plan stated the Issue identified, management action, period of monitoring and person responsible.</p>	Yes
4.5.3.3	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p>- Major compliance -</p>	<p>Sabapalm POM has established Standard Operating Procedure for handling of used chemicals and documented in Sustainability Management Procedure Manual title: Scheduled Waste Management; Doc. no. SMP-GPB-11; Rev. 01; Date: 11/6/2018.</p> <p>The Inventory of scheduled waste file reference no: ASSH/SDK(B)31/152/000/003 for June 2020. From the inventory was available for SW 102,305,306,408,409, 410 and 429.</p> <p>The disposal was done by Lagenda Bumimas Sdn Bhd. Sampling the consignment note for SW 410 No: 202002121243CYNK dated 12/02/2020. The license of Lagenda Bumimas Snd Bhd (license no: 003441 & 003442) available for review. The competent person available in Sabapalm POM.</p>	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	The domestic waste were collected by the estate twice a week and dump at designated area before collected by the municipal collectors. Sighted the records of rubbish collection in Estate Vehicle Work Distribution.	Yes
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	<p>The assessment of all polluting activities was conducted through environmental aspect and impact assessment which includes the greenhouse gas emissions, stack emission, scheduled wastes, solid wastes and effluent.</p> <p>Monitoring plan was established based on Environment Aspect and Impact assessment DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling.</p> <p>Other significant pollutant identified is the smoke emission from boiler operation. The mill currently is using multi-stage dust cyclone to minimise the pollutant. Monitoring of quality is done through regular stack sampling. Verification of the stack sampling reports [ref.: report # MS/GSOM/2019/BOILER NO. 3(S3)-2ND HALF, dated 15/9/2019 and RT003/2020/010, dated 10/3/2020 showed that the mill did not comply with the regulated limit which is 150 mg/m³. Nonetheless, the mill has been granted with contravene license [license no. 005230, validity 3/9/2019 to 3/9/2020] by the DOE. In order to comply the regulated limit, the mill is in the midst of getting its electrostatic precipitation (ESP) to be commenced which is expected to be at the end of the year.</p>	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Fossil fuel was most consumed at the engine room where the average consumption is 2.24 lt/mt FFB. Since May 2020, the mill has been using electricity supplied by SESB. Thereafter, the average consumption as at June 2020 has declined to 0.196 lt/mt FFB. The data is documented in the mill's monthly diesel consumption record. Monitoring of diesel fuel consumption was done by all the visited operating units. The data was then used for GHG calculating by using the RSPO GHG Calculator.	Yes
4.5.4.3	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations. - Major compliance -	Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE accordingly. The POME was treated according to regulation, the evidence was verified as per quarterly return form for Online Environmental Report (OER) file reference number: A31/152/000/014. The result show the BOD (Biological Oxidation Demand) was low than 100mg/L (48mg/L).	Yes
Criterion 4.5.5: Natural water resources			
4.5.5.1	The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.	Sabapalm POM has established SOP for riparian bufferzone and documented in Establishment and Management of Riparian Zone. Refer document no Gap-1 dated 1/1/2019. The water management plan:- a) The water source was from Sg Labuk and human made pond, This water was use as in process and use as consumption. b) Sighted River water analysis DYNAKEY Laboratories Sdn Bhd. Reference: E200622/03A-03C dated sampling on 20 June 2020 to	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	<p>c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>- Major compliance -</p>	<p>monitoring and prevent pollution of surface and groundwater for Sg Labuk.</p> <p>c) The management keep up the maintenance and try to reduce water leakage in mill and reuse water for mill cleaning.</p>	
4.5.5.2	<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>- Major compliance -</p>	<p>Effluent generated were disposed as prescribed under "Jadual Pematuhan" and latest water analysis was done on 20/6/2020 (E200622/03A-03C) by DYNAKEY Laboratories Sdn Bhd. And result show the POME for land application with BOD 299.</p>	Yes
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Mill Management			
4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>The SOP for the estates and mill operations are available which is prepared on Group basis. There are levels/types of the documentation identified as follows:</p> <p>a) Quality, Environmental, Safety & Health & Sustainability Manual – 01/7/17 b) System Procedure – 01/1/2012 c) Procedure Manual – 02/1/2018 d) SOM Standard Operating Manual – 2013 e) Safe Operating Procedure – 01/1/2011 f) Environmental Control Procedure – 01/9/2018 g) Store Operating Manual – 2014 h) Jobs description - 2012</p> <p>The mill operations are supervised by the staff, Engineers of the Mill.</p>	No

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
		<p>GSOM could not demonstrate that Standard Operating Procedures were consistently implemented.</p> <p>Section 6.8.2 Procedure of Social Management (Doc. No. SMP-GPB-32, Rev. 00 dated 18 Jan 2018 states that Workers Committee Meetings shall be conducted at least quarterly or whenever necessary. However, records show that the Workers' Committee Meetings at GSOM were only held on 6 March 2020 and 8 Oct 2019.</p> <p>Therefore, a Major Non-Compliance was issued.</p>	
4.6.1.2	<p>All palm oil mills shall implement best practices.</p> <p>- Major compliance -</p>	<p>The monitoring of the mill process is made through the shift supervision headed by An Engineer/Executives. All process parameters are documented and summarized in a daily report. The external monitoring is made through visits i.e. SVP and the mill management team. As per site verification and as per Chief Operating Officer report showed that the mills operation were conducted base on the SOP established.</p>	Yes
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p>	<p>The mill has developed 5-years business plan from Year 2019 to Year 2022. The business plan has included the production cost, projected OER and KER rate. The budget contains operation cost such as labour cost, chemical cost and electricity cost.</p>	Yes
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p>	<p>Based on CPO Transport Agreement sighted between Genting SDC Sdn Bhd and Landasan Kembar Sdn Bhd and Juita Baru Sdn Bhd dated 1 May 2018, evidence is available that the agreements contain clear</p>	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	pricing schedule which is understood by the contractors. This was also confirmed by the contractors during audit interview.	
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>Based on the review of the CPO Transport Agreement between Genting SDC Sdn Bhd and Landasan Kembar Sdn Bhd and Juita Baru Sdn Bhd dated 1 May 2018 are fair, legal and transparent. It contains rights and obligations of both parties, payment terms, contract duration of 3 years, mutual termination clause and reasons for termination.</p> <p>Interviews with the contractors also confirmed that payments are made in a timely manner. Sighted during the audit were the following invoices and payment vouchers:</p> <p><u>Landasan Kembar Sdn Bhd:</u> Invoice No. IV2003/0010 and IV2003/0009 dated 31 March 2020 for the sum of RM3,061.17 and RM749.00 respectively. Payment for both invoices were made on 4 June 2020.</p> <p><u>Juita Baru Sdn Bhd:</u> Invoice No. T20/04/023 and T20/03/016 dated 31 March for the sum of RM9,978.16 and RM7928.30 respectively. Payment for both invoices were made on 11 June 2020.</p> <p>A Major Non-Compliance was raised in the previous Audit where payments for contractors were not paid in timely manner as per agreed contract. Reviewed during this current audit was the Addendum to Clause 4.0 (Outside FFB Purchase Policy) which took effect on 1 April 2019. This Addendum which was signed by FFB suppliers revised the payment period from 12th of every month to 15th of every month. Based on documentation review conducted during this current audit, evidence</p>	Yes

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance															
		<p>is available that FFB suppliers are being within the agreed timeframe of 15 days.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">FFB Suppliers</th> <th style="text-align: left;">Amount paid</th> <th style="text-align: left;">When paid</th> </tr> </thead> <tbody> <tr> <td>A Rahman Harry bin Diong</td> <td>RM8,905.85</td> <td>13 Nov 2019</td> </tr> <tr> <td>Ainon binti Todok</td> <td>RM1,473.95</td> <td>13 Nov 2019</td> </tr> <tr> <td>Abd Kadir bin Gilang</td> <td>RM3,894.87</td> <td>12 Jun 2020</td> </tr> <tr> <td>Maikol bin Kumar</td> <td>RM5,544.40</td> <td>13 Nov 2019</td> </tr> </tbody> </table> <p>Therefore, the Major Non-Compliance raised in the previous Surveillance Audit has been sufficiently closed.</p>	FFB Suppliers	Amount paid	When paid	A Rahman Harry bin Diong	RM8,905.85	13 Nov 2019	Ainon binti Todok	RM1,473.95	13 Nov 2019	Abd Kadir bin Gilang	RM3,894.87	12 Jun 2020	Maikol bin Kumar	RM5,544.40	13 Nov 2019	
FFB Suppliers	Amount paid	When paid																
A Rahman Harry bin Diong	RM8,905.85	13 Nov 2019																
Ainon binti Todok	RM1,473.95	13 Nov 2019																
Abd Kadir bin Gilang	RM3,894.87	12 Jun 2020																
Maikol bin Kumar	RM5,544.40	13 Nov 2019																
Criterion 4.6.4: Contractor																		
4.6.4.1	<p>In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p>	<p>Evidence is available that contractors understand MSPO requirements. Briefings on MSPO requirements were made during Stakeholder Meeting on 10 March 2020. Additionally, contractors are also required to sign Transport Agreement Addendum on RSPO, MSPO, SCC & OSHA 1994. Sighted during this audit were documents signed between Genting SDC Sdn Bhd with Landasan Kembar Sdn Bhd and Juita Baru Sdn Bhd. Clauses 5 and 6 of the Addendum state that the Transporter would comply with the MSPO requirements and shall provide cooperation and relevant access to the appointed Certification Bodies.</p>	Yes															
4.6.4.2	<p>The management shall provide evidence of agreed contracts with the contractor.</p>	<p>Evidence of agreed contracts are available between Genting SDC Sdn Bhd and Landasan Kembar Sdn Bhd as well as with Juita Baru Sdn Bhd dated 1 May 2018 were made available during the audit.</p>	Yes															

MSPO Public Summary Report
Revision 1 (Feb 2020)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.6.4.3	<p>The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.</p> <p>- Minor compliance -</p>	<p>Transport Agreement Addendum on RSPO, MSPO, SCC & OSHA 1994 were sighted during this audit. These documents were signed between Genting SDC Sdn Bhd with Landasan Kembar Sdn Bhd and Juita Baru Sdn Bhd. Clause 6 of the Addendum states that the Transporter would comply with the MSPO requirements and shall provide cooperation and relevant access to the appointed Certification Bodies. During the audit, interviews were conducted with the transporters and copies of relevant documents such as invoices, contracts and proof of salary payments were made available during the audit.</p>	Yes

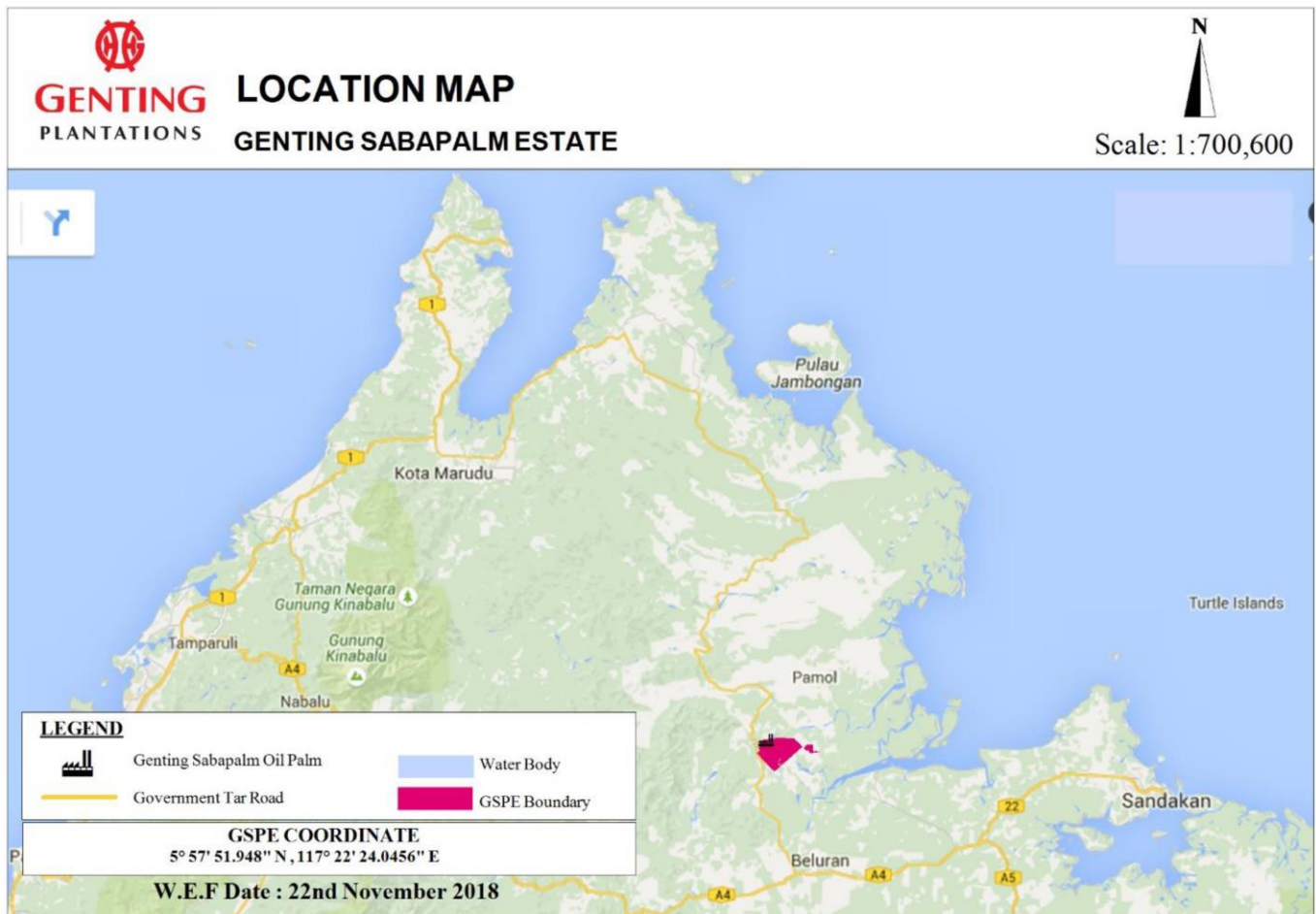
Appendix B: List of Stakeholders Contacted

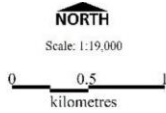
<p>Government Officer: Sabah Immigration Department</p>	<p>Community/neighbouring village: Headmaster of SK Ladang Sabapalm Head of Village Kg. Tagas-Tagas Smallholders (FFB Suppliers)</p>
<p>Suppliers/Contractors/Vendors: Juita Baru Sdn Bhd Sykt Tan Hong Transport</p>	<p>Worker’s Representative/Gender Committee: Estate managers Mill engineer Supervisors, Staff & Clerks Mill local & foreign workers (process, workshop, etc.) Estate local & foreign workers (harvesters, sprayers, etc.) Local workers representatives Foreign workers representatives Gender committee representative Crèche minder Estate Hospital Assistant</p>

Appendix C: Smallholder Member Details

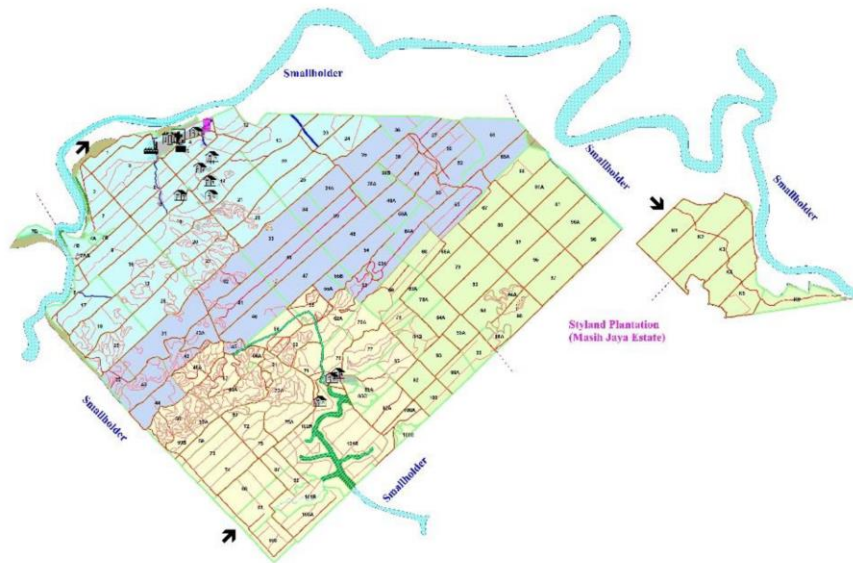
(Nil)

Appendix D: Location and Field Map





GPS MAP OF GENTING SABAPALM ESTATE



LEGEND

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



GPS E. Coordinates : 5,965087 N, 117,374117 E
 Projection : Longitude/Latitude
 Datum : WGS 84
 Data Source : Field Survey Using Garmin
 Prepared by :
 Genting Plantations Research Centre Sabah (GPRCS)
 Date Updated : 15 July 2015

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

Appendix 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