

**MALAYSIAN SUSTAINABLE PALM OIL  
3rd ANNUAL SURVEILLANCE ASSESSMENT  
Public Summary Report**

<b>Genting Plantations Berhad</b>
Client company Address: 10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
Certification Unit: Genting Oil Mills (Sabah) Sdn Bhd Genting Tanjung Oil Mill and Genting SDC Sdn Bhd Genting Tanjung Estate, Genting Tenegang Estate, Genting Landworthy Estate, Genting Layang Estate & Genting Bahagia Estate  Location of Certification Unit: Mile 97, Sandakan-Lahad Datu Road, Tenegang, Jalan Jeroco 90200 Kinabatangan, Sabah, Malaysia

**Report prepared by:**  
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**Report Number: SMO 3091772**

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## Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	Genting Plantations Berhad		
Mill/Estate	MPOB License No.	Expiry Date	
	Genting Tanjung Oil Mill (GTOM) - 500137704000	30/11/2020	
	Genting Tanjung Estate (GTJE) - 502249802000	31/08/2020	
	Genting Tenegang Estate (GTGE) - 504760102000	30/06/2021	
	Genting Landworthy Estate (GLWE) - 503827102000	31/01/2021	
	Genting Layang Estate (GLYE) - 504759802000	30/06/2021	
	Genting Bahagia Estate (GBGE) - 502249802000	30/06/2021	
Address	<u>Head Office:</u> 10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia  <u>Certification unit:</u> Mile 97, Sandakan-Lahad Datu Road, Tenegang, Jalan Jeroco, 90200 Kinabatangan, Sabah, Malaysia		
Certification Unit	Genting Tanjung Palm Oil Mill & Plantations		
Contact Person Name	Mr. Arunan Kandasamy (Senior Vice President - Plantation Division)		
Website	<a href="http://www.gentingplantations.com/">http://www.gentingplantations.com/</a>	E-mail	arunan.kandasamy@genting.com
Telephone	03 2333 6510 (Head Office)	Facsimile	03 2333 6575

1.2 Certification Information			
Certificate Number	Mill: MSPO 680512 Estate: MSPO 692777		
Issue Date	09/08/2018	Expiry date	08/08/2023
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Standard	MS 2530-3:2013 and MS 2530-4:2013		
Stage 1 Date	N/A (The certification unit is RSPO certified)		
Stage 2 / Initial Assessment Visit Date (IAV)	20-21 and 24/11/2017		
Continuous Assessment Visit Date (CAV) 1	21-24/11/2018		
Continuous Assessment Visit Date (CAV) 2	11-14/11/2019		
Continuous Assessment Visit Date (CAV) 3	13-16/07/2020		

Continuous Assessment Visit Date (CAV) 4	-		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-CERT-DE-60183796	ISCC	ASG CERT	12/01/2020
RSPO 652320	RSPO	BSI Services Malaysia Sdn Bhd	10/01/2022
MSPO 716640	MSPO SCCS	BSI Services Malaysia Sdn Bhd	06/10/2024

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	
		Latitude	Longitude
Genting Tanjung Oil Mill	Mile 97, Sandakan-Lahad Datu Road, Tenegang, Jalan Jeroco 90200 Kinabatangan, Sabah, Malaysia	5° 25' 22.8" N	118° 16' 23.9" E
Genting Tanjung Estate		5° 25' 22.8" N	118° 16' 23.9" E
Genting Tenegang Estate		5° 20' 46.02" N	118° 13' 32.2" E
Genting Landworthy Estate		5° 25' 13.4" N	118° 18' 24.6" E
Genting Layang Estate		5° 25' 21.9" N	118° 14' 3.35" E
Genting Bahagia Estate		5° 21' 49.5" N	118° 16' 33.7" E

1.4 Certified Area					
Estates	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Tanjung	3,973.66	234.96	257.65	4,466.27	88.97
Genting Bahagia	4,029.42	44.54	353.08	4,427.04	91.02
Genting Landworthy	3,695.66	9.87	333.47	4,039.00	91.50
Genting Layang	1,817.80	179.92	79.69	2,077.41	87.50
Genting Tenegang	3,420.28	29.75	202.51	3,652.54	93.64
TOTAL	16,936.82	499.04	1,226.40	18,662.26	90.75

1.5 Plantings & Cycle							
Estates	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Tanjung	1,057.10	688.61	198.28	-	2,029.67	2,916.56	1,057.10
Genting Bahagia	1,162.44	-	-	-	2,866.98	2,866.98	1,162.44
Genting Landworthy	184.97	-	-	3,087.37	423.32	3,510.69	184.97

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Genting Layang	88.80	180.95	979.83	568.22	-	1,729.00	88.80
Genting Tenagang	798.53	423.44	265.08	-	1,933.23	2,621.75	798.53
Total (ha)	3,291.84	1,293.00	1,443.19	3,655.59	7,253.20	13,644.98	3,291.84

<b>1.6 Certified Tonnage of FFB</b>			
<b>Estates</b>	<b>Tonnage / year</b>		
	<b>Estimated (Nov 2019 - Oct 2020)</b>	<b>Actual (Nov 2019 - Jun 2020)</b>	<b>Forecast (Nov 2020 - Oct 2021)</b>
Genting Tanjung	65,552	34,857.85	62,940.00
Genting Bahagia	61,657	34,701.46	59,800.00
Genting Landworthy	73,658	40,073.55	74,500.00
Genting Layang	39,436	23,225.18	40,160.00
Genting Tenagang	50,999	34,393.16	50,780.00
Ace Foremost Sdn Bhd	NA	1,464.40	2,422.00
Tentu Murni Sdn Bhd	NA	7,561.25	10,342.00
Winking Plantation Sdn Bhd	NA	5,171.63	6,599.00
Malbumi Estate Sdn Bhd	NA	2,503.47	3,280.00
Syt.Yu Kwang Dev. Sdn Bhd	NA	6,174.25	4,697.00
Tenera Eco Plantations Sdn Bhd	NA	1,549.16	2,573.00
Total	291,302	191,675.36	318,093.00

<b>1.7 Uncertified Tonnage of FFB</b>			
<b>Estate</b>	<b>Tonnage / year</b>		
	<b>Estimated (Nov 2019 - Oct 2020)</b>	<b>Actual (Nov 2019 - Jun 2020)</b>	<b>Forecast (Nov 2020 - Oct 2021)</b>
Chong Lip Chong	NA	307.72	NA
Tey Ah Bu Plantation	NA	12,213.68	NA
Anchor Prospects Sdn Bhd	NA	812.53	NA
Harus Permai Sdn Bhd	NA	1,142.60	NA
V.K Kalyanasunram Plantation Sdn Bhd	NA	4,608.40	NA
Smart Foremost	NA	-	NA
Matsu Green Sdn Bhd	NA	379.69	NA
Green Palm	NA	341.00	NA

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Total	NA	19,805.62	NA
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<b>1.8 Certified Tonnage</b>			
	<b>Estimated (Nov 2019 - Oct 2020)</b>	<b>Actual (Nov 2019 - Jun 2020)</b>	<b>Forecast (Nov 2020 - Oct 2021)</b>
<b>Mill Capacity: 60 MT/hr</b>	FFB	FFB	FFB
	291,302.00	191,675.36	318,093.00
<b>SCC Model: MB</b>	CPO (OER: 21.18%)	CPO (OER: 22.50%)	CPO (OER: 20.71%)
	61,697.76	43,128.87	65,889.72
	PK (KER: 5.30%)	PK (KER: 5.39%)	PK (KER: 4.91%)
	15,439.01	10,332.01	15,605.46

<b>1.9 Actual Sold Volume (CPO) (Nov 2019 – Jun 2020)</b>				
<b>MSP0 Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
	<b>ISCC</b>	<b>RSPO</b>		
0	29,877.45	3,708.78	9,878.55	<sup>1</sup> 43,464.78

Note: <sup>1</sup>Variance of 335.91 mt with total production due to balance was brought forward from previous period.

<b>1.10 Actual Sold Volume (PK) (Nov 2018 – Feb 2020)</b>				
<b>MSP0 Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
	<b>ISCC</b>	<b>RSPO</b>		
0	0	8,063.23	2,322.12	<sup>1</sup> 10,385.35

Note: <sup>1</sup>Variance of 53.34 mt with total production due to balance was brought forward from previous period.

## 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 13-16/7/2020. The audit programme is included in Section 2.3. The approach to the audit was to treat the Genting Tanjung Oil Mill as an MSPO Certification Unit and its five (Genting Tanjung, Genting Bahagia, Genting Landworthy, Genting Layang, Genting Tenagang) FFB supply bases 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.

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

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

**Tentative Date of Next Visit: July 12, 2021 - July 15, 2021**

**Total No. of Mandays: 8**



**2.1 BSI Assessment Team**

<b>Team Member Names</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Valence Shem (VSH)	Team Leader	He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS, MSPO and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012, MSPO Awareness Training in 2014 and ISO 45000 Lead Auditor Course in 2019. During this assessment he covered the elements of social, employees' welfare and stakeholders' affair. Able to communicate in Bahasa Malaysia and English.
Amir Bin Bahari (ABB)	Team Member	He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment, he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During this assessment, he covers the aspects on legal, mill best practices, good agriculture practice, occupational safety and health. He is fluent in both verbal/written in Bahasa Malaysia and English.

**2.2 Accompanying Persons**

<b>No.</b>	<b>Name</b>	<b>Role</b>
	NA	

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**2.3 Assessment Plan**

The Assessment plan was sent to the client prior to the assessment.

Date	Time	Subjects	VSH	ABB
Monday 13/7/2020	0830-0900	Opening meeting: <ul style="list-style-type: none"> <li>Opening presentation by audit team leader</li> <li>Confirmation of assessment scope and finalize audit plan (including stakeholder’s consultation)</li> </ul>	✓	✓
	0900-1200	<b>Genting Tanjung POM</b> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	✓	✓
	1000-1200	<b>Stakeholder consultations:</b> Client to invite the relevant stakeholders for <b>both mill and estates</b> which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.), etc.	✓	
	1200-1300	Lunch break		
	1300-1630	<b>Genting Tanjung POM</b> Document Review P1 – P6 (MSPO Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓
	1630-1700	Interim closing briefing	✓	✓
Tuesday 14/7/2020	0900-1200	<b>Genting Layang Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, worker housing, clinic, Landfill, etc.	✓	✓
	1200-1300	Lunch break		
	1300-1630	<b>Genting Layang Estate</b> Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓
	1630-1700	Interim closing briefing	✓	✓
Wednesday 15/7/2020	0900-1200	<b>Genting Landworthy Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, worker housing, clinic, Landfill, etc.	✓	✓

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Date	Time	Subjects	VSH	ABB
	1200-1300	Lunch break		
	1300-1630	<b>Genting Landworthy Estate</b> Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓
	1630-1700	Interim closing briefing	✓	✓
Thursday 16/7/2020	0930-1200	<b>Genting Tanjung Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, worker housing, clinic, Landfill, etc.	✓	✓
	1200-1300	Lunch break		
	1300-1600	<b>Genting Tanjung Estate</b> Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓
	1600-1630	Verify any outstanding issues & preparation for closing meeting	✓	✓
	1630-1730	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 one (1) Major & two (2) Minor nonconformities raised. The Genting Tanjung Oil Mill and supply base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Major Nonconformity:		
<b>Ref:</b> 1929259-202007-M1	<b>Area/Process:</b> Genting Tanjung Estates	<b>Clause:</b> MS 2530:2013 Part-3, 4.4.5.9
	<b>Issue Date:</b> 16/07/2020	<b>Due Date:</b> 14/10/2020
<b>Requirements:</b>	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	
<b>Statement of Nonconformity:</b>	The daily wage of a worker did not meet the legal minimum wage.	
<b>Objective Evidence:</b>	Based on sampled pay slips verification of a worker (employee # E02651) at Genting Tanjung Estate, his wages in Dec 2019 and June 2020 were RM22.94 and RM23.74 respectively. Furthermore, verbally confirmed by the AM in-charge, the other workers performing the same task (spraying) for the same months also did not meet the legal minimum wage which is RM42.31/day.	
<b>Corrections:</b>	GTJE will proceed to top up the salary for the said worker and his gang to meet the minimum wages.	
<b>Root cause analysis:</b>	The minimum wages is not meet because the worker and his gang, as recorded in the productivity form for each worker in respective months, to have Absent and Incomplete working hour due to back home early before 1.00pm. However estate GTJE did not have any actual record for the exact stop work during the days in the respective months because the field staff did not record the actual stop work time for each worker in the their individual Productivity Form.	
<b>Corrective Actions:</b>	A briefing will conduct to all Assistant Managers & field staff to improve recording effectiveness for the Productivity Monitoring Form for specific work unit i.e.	

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	<p>Maintenance, Manuring and General Work gang. Field staff is compulsory to record actual Stop Work time for the worker who have not complete a working hours and must be acknowledged by the individual workers &amp; witness by Mandore during the next day Morning Master.</p> <p>Other Genting Plantation Operating unit will conduct the said briefing to its Assistant Managers &amp; Field Staff so that the actual stop work time for each worker who have not complete their working hour is specifically recorded in the Daily Productivity Form and will be acknowledged by the worker during the next day morning master.</p> <p>Sustainability Department will monitor the effectiveness of the Productivity Form in monthly basis as well as during the MSPO internal audit.</p>
Assessment Conclusion:	<p>The following evidences were verified:</p> <ol style="list-style-type: none"> <li>1) Payslips that shows that the affected workers have been "topped-up" to meet the minimum wage.</li> <li>2) Records that shows that briefing has been conducted to the assistant managers &amp; field staff in utilising the "Productivity Monitoring Form"</li> <li>3) Samples of "Productivity Monitoring Form" that have been filled in that shows the form has been effectively utilised.</li> </ol> <p>The evidence of correction and corrective action was found to be sufficient to close the NCR. Effective continuous implementation of the corrective actions shall be verified in the next assessment.</p>

**Minor Nonconformity:**

<b>Ref:</b> 1929259-202007-N1	<b>Area/Process:</b> All sampled Estates	<b>Clause:</b> MS 2530:2013 Part-3, 4.4.5.4
	<b>Issue Date:</b> 16/07/2020	<b>Due Date:</b> Next assessment
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:	There is no evidence that the management has ensured that the employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.	
Objective Evidence:	There is no evidence that the management has ensured that the employees of contractors e.g. FFB and EFB transporters are paid based on legal or industry minimum standards according to the employment contract agreed between the contractors and their employees.	
Corrections:	Estate management will request from all contractors for their workers' pay slip from January 2020 to date, to be submitted to the office and will be verified with accordance to the Minimum Wages Order 2020.	
Root cause analysis:	The requirements to submit the pay-slip of contractor's worker to the estate management in monthly basis is already stated in the contractor's agreement clause 3.4(ii), however there is no monitoring done by the estate management to ensure that these condition is complied.	

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Corrective Actions:	Sustainability Dept. will conduct a refresh briefing regarding this requirement to the estate management so that the monitoring will be done in monthly basis without any misses. Sustainability Department will monitor this compliance in monthly basis and in the next MSPO Internal.
Assessment Conclusion:	The correction and corrective action plan were accepted. The evidence of effective implementation shall be verified in the next assessment visit.

**Minor Nonconformity:**

<b>Ref:</b> 1929259-202007-N2	<b>Area/Process:</b> Genting Tanjung POM	<b>Clause:</b> MS 2530:2013 Part-4, 4.4.5.4
	<b>Issue Date:</b> 16/07/2020	<b>Due Date:</b> Next assessment
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:	There is no evidence that the management has ensured that the employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.	
Objective Evidence:	There is no evidence that the management has ensured that the employees of contractors e.g. CPO and PK transporters are paid based on legal or industry minimum standards according to the employment contract agreed between the contractors and their employees.	
Corrections:	Mill management will request from all contractors for their workers' pay slip from January 2020 to date, to be submitted to the office and will be verified with accordance to the Minimum Wages Order 2020.	
Root cause analysis:	The requirements to submit the pay-slip of contractor's worker to the estate management in monthly basis is already stated in the contractor's agreement clause 3.4(ii), however there is no monitoring done by the mill management to ensure that these condition is complied.	
Corrective Actions:	Sustainability Dept. will conduct a refresh briefing regarding this requirement to the mill management so that the monitoring will be done in monthly basis without any misses. Sustainability Department will monitor this compliance in monthly basis and in the next MSPO Internal.	
Assessment Conclusion:	The correction and corrective action plan were accepted. The evidence of effective implementation shall be verified in the next assessment visit.	

**Opportunity For Improvement**

<b>Ref:</b>	<b>Area/Process:</b>	<b>Clause:</b>
Objective Evidence:	Nil	

Noteworthy Positive Comments	
1	Good cooperation by management team/staff/sustainability team
2	Good documentation upkeep and retrieval
3	Good housekeeping at working places e.g. workshop, storage, mill operation areas, etc.

### 3.3 Status of Nonconformities Previously Identified and OFI

Major Nonconformity:					
<b>Ref:</b> 1842984-201911-M1	<table border="1"> <tr> <td><b>Area/Process:</b> Mill</td> <td><b>Clause:</b> MS 2530:2013 Part-4, 4.5.3.2</td> </tr> <tr> <td><b>Issue Date:</b> 14/11/2019</td> <td><b>Due Date:</b> 12/02/2020</td> </tr> </table>	<b>Area/Process:</b> Mill	<b>Clause:</b> MS 2530:2013 Part-4, 4.5.3.2	<b>Issue Date:</b> 14/11/2019	<b>Due Date:</b> 12/02/2020
<b>Area/Process:</b> Mill	<b>Clause:</b> MS 2530:2013 Part-4, 4.5.3.2				
<b>Issue Date:</b> 14/11/2019	<b>Due Date:</b> 12/02/2020				
<b>Requirements:</b>	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution				
<b>Statement of Nonconformity:</b>	Waste management plan was not effectively implemented				
<b>Objective Evidence:</b>	During the site visit to workshop (Spare part store) on 14th November 2019, it was found that, 1. Used oil spillage on the floor 2. Used oil storage is not as per Waste Management Plan established documented in Identification, Segregation and Storage of waste dated 26/10/2019.				
<b>Corrections:</b>	1. All spillage will be cleaned up immediately and all drums that stored the use oil will be transferred immediately to the Scheduled Waste store. Strictly no used oil will be stored in the Lubricant Store, but must be immediately stored in the Schedule Waste Store. 2. Conduct training to the PIC Store and Workshop on the used oil management as per documented procedure in the Mill Waste Management Plan, Identification, Segregation and Storage of Waste.				
<b>Root cause analysis:</b>	The training and briefing on waste management that is done to workers is not fully effective because the worker did not immediately clean up the used oil spillage after transferring the used oil into the drum and the drum that store the used oil is also did not transfer immediately to the Schedule Waste Store.				
<b>Corrective Actions:</b>	Renovation to the Lubricant store will commence to improve the store floor condition for better spillage management. Training for PIC Store and Workshop on Waste Management Plan will be conducted every 6 month and will be included in the Mill OSH Training Plan for 2020 as a monitoring plan and will be further check during the next MSP0 Internal Audit.				
<b>Assessment Conclusion:</b>	Evidence submitted: 1. Picture of cleaned use oil spillage in the lubricant store and used oil drum stored in the schedule waste store. 2. Training record for the PIC store and workshop on waste management plan. 3. The Mill OSH Training Plan for 2020. Major NC closed on 13/12/2019 The effectiveness of the CAP implementation will be verified in the next surveillance assessment.				
<b>Verification Statement</b>	During the site visit to the mill SW store on 13/7/2020 it was observed storage is on order and all containers are labelled. The date of production and type of SW was also available on the sticker. The storage facilities and the housekeeping was satisfactorily				

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	<p>maintained. There was no sign of spillage noted. Training relating to the SW management was conducted on 16/1/20 (ERP chemical spillage), 25/10/19 (recycling program &amp; SW management) and 24/10/19 (SW management).</p> <p>The raised NCR remains closed.</p>
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<b>Minor Nonconformity:</b>		
<b>Ref:</b> 1842984-201911-N1	<b>Area/Process:</b> Estate	<b>Clause:</b> MS 2530:2013 Part-4, 4.5.3.2
	<b>Issue Date:</b> 14/11/2019	<b>Due Date:</b> 16/07/2020
<b>Requirements:</b>	The occupational safety and health plan shall cover the following: b) The risks of all operations shall be assessed and documented.	
<b>Statement of Nonconformity:</b>	The OSH plan was not effectively implemented. i. HIRARC was not reviewed for accident cases occurred. ii. First aid case investigation process was not adequately addressed according to internal procedure requirements.	
<b>Objective Evidence:</b>	<p>GTGE No HIRARC review for 4 accident cases (minor accident) occur in the month of June and 1 case (major accident) occur in July 2019.</p> <p>GBGE No HIRARC review for 2 accident cases (minor accident) occur in the month of March and August 2019. No investigation conducted for 4 accident cases (minor accident) in GTGE and 2 accident cases (minor accident) in GBGE.</p>	
<b>Corrections:</b>	<p>SHO will conduct a briefing and training to GTGE and GBGE management regarding Guideline for HIRARC and conduct HIRARC review based on all accident reported by the estate for 2019.</p> <p>SHO will conduct a briefing and training session to GTGE's HA and GBGE's HA regarding the company's OSH Manual procedure.</p> <p>Investigation to all the accident cases will be conducted and report through Borang A, Accident Investigation Report as per company's OSH Manual procedure.</p>	
<b>Root cause analysis:</b>	<p>No HIRARC review has been done after each accident reported. This is because of inadequate knowledge and guidance on how to execute the HIRARC review, among the estate management.</p> <p>The HA did not conduct the accident investigation because of their knowledge on the company's OSH Manual procedure OM-GPB-01 - Pemberitahuan Dan Penyiasatan Kemalangan Di Tempat Kerja requirement is still inadequate because no briefing or training regarding OSH Manual done to the HA.</p>	
<b>Corrective Actions:</b>	<p>SHO will produce a flow chart of procedure on how and when to review or update the HIRARC. Training and briefing on HIRARC by SHO will be implemented yearly and included in estate OSH Training Plan for 2020.</p> <p>Briefing and Training on OSH Manual will be an annual program conducted by the SHO for all estate HA. This will be included in estate OSH Training Plan for 2020 as a monitoring plan and will be further check during the next MSPO Internal Audit.</p>	
<b>Assessment Conclusion:</b>	<p>Evidence submitted:</p> <p>1. Training and briefing record done by SHO to the estate management on Guideline for HIRARC for GTGE</p>	



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	<p>2. Training and briefing record done by SHO to the estate management on Guideline for HIRARC for GBGE</p> <p>3. Reviewed HIRARC for related occupational accident for GTGE.</p> <p>4. Reviewed HIRARC for related occupational accident for GBGE.</p> <p>5. Training and Briefing record on OSH Manual to GTGE HA.</p> <p>6. Training and Briefing record on OSH Manual to GBGE HA.</p> <p>7. Borang A Accident Investigation Report for 4 minor accident cases for GTGE</p> <p>8. Borang A Accident Investigation Report for 2 minor accident cases for GBGE</p> <p>9. Flow chart of procedure on how and when to review or update the HIRARC.</p> <p>10. GTGE OSH Training Plan 2020</p> <p>11. GBGE OSH Training Plan 2020</p> <p>The effectiveness of the CAP implementation will be verified in the next surveillance assessment.</p>
Verification Statement	<p>During the audit for the 3 estates all documentation relating to HIRARC has been complied. This includes the revision made to HIRARC in event of accident incidences. Genting Tanjung Estate had 1 case of 25 days LTI dated 08/7/2019. A harvester felled down while riding motorcycle and injured left leg as the knife cover ruptured. The incidence was investigated. The reviewed HIRARC was sighted. Training relating to HIRARC management was also conducted as follows:</p> <p>a) SOP Weeding / HIRARC - 22/2/20, 16/1/20</p> <p>b) Safety awareness - 29/8/19 &amp; 14/2/20</p> <p>c) OSH guidelines - 13/9/19 &amp; 18/6/20</p> <p>d) Harvesting SOP - 09/3/20, 19/6/20</p> <p>e) Harvesting activities SOP - 17/1/20, 20/1/20 &amp; 24/7/19</p> <p>Details as per 4.4.6.3.</p> <p>Thus, this NCR is closed.</p>

Minor Nonconformity:		
Ref: 1842984-201911-N2	Area/Process: Estate	Clause: MS 2530:2013 Part-4, 4.5.3.2
	Issue Date: 14/11/2019	Due Date: 16/07/2020
Requirements:	<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>	
Statement of Nonconformity:	Waste management plan was not effectively implemented	
Objective Evidence:	<p>GBGE</p> <p>Sighted during site visit sighted the evidence of recycle waste such as paper boxes and plastic water bottle was disposed in the landfill even though the estate management has established designated place for 3R collection center. Thus, the management plan was not effectively implemented.</p>	

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Corrections:	<p>GBGE will re-conduct the training for all the workers regarding segregation of the recycle waste from domestic waste and also briefing on how to use the 3R collecting centre that already provided.</p> <p>All recycle that is in the current landfill will be segregate and placed in the recycle centre.</p>								
Root cause analysis:	<p>The training on Recycle Waste Management done to all the estate workers was not effective because still some workers did not segregate the recycle waste from the domestic waste.</p>								
Corrective Actions:	<p>Training program for Recycle waste management will be revised from once a year to 2 time a year which is will be conducted every 6 months. The training will be included in the Annual Training Plan for 2020 as a monitoring plan and will be further check during the next MSP0 Internal Audit.</p>								
Assessment Conclusion:	<p>Evidence submitted:</p> <ol style="list-style-type: none"> <li>1. Training and Briefing record for the Recycle waste management and how to use the 3R collecting centre.</li> <li>2. Photo of the current landfill that cleared from Recycle Waste.</li> <li>3. GBGE Annual Training Plan for 2020</li> </ol> <p>The effectiveness of the CAP implementation will be verified in the next surveillance assessment.</p>								
Verification Statement	<p>The landfill site was visited and verified that only domestic wastes are disposed in the dug holes/space. The locations of the landfill areas</p> <table border="0" style="margin-left: 40px;"> <thead> <tr> <th style="text-align: left;">Estate</th> <th style="text-align: left;">Landfill site</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>G Layang P1999 Blk 25</td> </tr> <tr> <td>2</td> <td>G Tanjung P2002 Blc 1</td> </tr> <tr> <td>3</td> <td>G Lworthy P1996 Blc 38</td> </tr> </tbody> </table> <p>Training in relation to the waste management was conducted.</p> <ol style="list-style-type: none"> <li>1) OSH guidelines - 13/9/19 &amp; 18/6/20</li> <li>2) RSPO MSP0 awareness - 24/2/20, 26/8/19 &amp; 14/10/19</li> <li>3) Workshop management - 23/7/19</li> <li>4) Recycling program triple rinsing 30/6/20 &amp; 13/7/20</li> </ol> <p>Other details as per 4.4.6.3.</p> <p>Thus, this NCR is closed.</p>	Estate	Landfill site	1	G Layang P1999 Blk 25	2	G Tanjung P2002 Blc 1	3	G Lworthy P1996 Blc 38
Estate	Landfill site								
1	G Layang P1999 Blk 25								
2	G Tanjung P2002 Blc 1								
3	G Lworthy P1996 Blc 38								

**3.4 Summary of the Nonconformities and Status**

<b>CAR Ref.</b>	<b>CLASS</b>	<b>ISSUED</b>	<b>STATUS</b>
1706956-201810-M1	Major	20/11/2019	Closed 25/3/2019
1706956-201810-M2	Major	20/11/2019	Closed 25/3/2019
1706956-201810-M3	Major	20/11/2019	Closed 25/3/2019
1842984-201911-M1	Major	14/11/2019	Closed 13/12/2019
1842984-201911-N1	Minor	14/11/2019	Closed 16/07/2020
1842984-201911-N2	Minor	14/11/2019	Closed 16/07/2020
1929259-202007-M1	Major	16/07/2020	Closed 09/10/2020
1929259-202007-N1	Minor	16/07/2020	Open
1929259-202007-N2	Minor	16/07/2020	Open



**3.5 Issues Raised by Stakeholders**

IS #	Description
<p><b>1</b></p>	<p><b>Issues:</b>  <u>KM Enterprise (supplier)</u>            Has been in business relationship with the company for long time. Satisfied with the pricing mechanism and knew how to lodge grievance should there be any.</p> <p><b>Management Responses:</b>            NA</p> <p><b>Audit Team Findings:</b>            NA</p>
<p><b>2</b></p>	<p><b>Issues:</b>  <u>Neighbouring estates (FFB suppliers)</u>            Has been in business relationship with the company for long time. Satisfied with the pricing mechanism and management of road conditions. They also knew how to lodge grievance should there be any. Occasionally there were incidents that the company’s buffaloes encroached in their areas.</p> <p><b>Management Responses:</b>            Management will attend the buffalo encroachment issue and take the necessary action.</p> <p><b>Audit Team Findings:</b>            NA</p>

**Section 4: Assessment Conclusion and Recommendation**

<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>		
Based on the findings during the assessment, Genting Tanjung Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Genting Tanjung Certification Unit Certification Unit is approved and/or continued.		
<b>Acknowledgement of Assessment Findings</b>		<b>Report Prepared by</b>
<b>Name:</b> Arunan Kandasamy	<b>Name:</b> [Signature]	<b>Name:</b> Valence Shem
<b>Company name:</b> Genting Plantations Bhd	<b>Company name:</b> [Signature]	<b>Company name:</b> BSI Services Malaysia Sdn Bhd
<b>Title:</b> SVP-Plantation	<b>Title:</b> [Signature]	<b>Title:</b> Lead Auditor
<b>Signature:</b>  ARUNAN KANDASAMY SENIOR VICE PRESIDENT PLANTATION (MALAYSIA)	<b>Signature:</b> [Signature]	<b>Signature:</b> 
<b>Date:</b> 02/03/2021	<b>Date:</b>	<b>Date:</b> 1/3/2021

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<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>		
Based on the findings during the assessment, Genting Tanjung Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Genting Tanjung Certification Unit is approved and/or continued.		
<b>Acknowledgement of Assessment Findings</b>		<b>Report Prepared by</b>
<b>Name:</b>	<b>Name:</b> CHOO HUAN BOON Senior Vice President-Processing (Malaysia) & Downstream Manufacturing	<b>Name:</b> Valence Shem
<b>Company name:</b>	<b>Company name:</b>	<b>Company name:</b> BSI Services Malaysia Sdn Bhd
<b>Title:</b>	<b>Title:</b>	<b>Title:</b> Lead Auditor
<b>Signature:</b>	<b>Signature:</b> 	<b>Signature:</b> 
<b>Date:</b>	<b>Date:</b> 2/3/2021	<b>Date:</b> 1/3/2021

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

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

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	A policy for the implementation of MSPO shall be established. - <b>Major compliance</b> -	Genting Plantations Berhad has established an MSPO Policy dated 18/3/2014 signed by the President & Chief Operating Officer. The Policy among others emphasized the following; a) Committed to to the 3 pillars of sustainable development namely people, planet and profit. b) To establish and maintain an effective sustainability management system throughout the organization. c) To ensure compliance with MSPO and the MPOB code of practice requirements.  The Policy is adopted in all GPB estates and mills.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. - <b>Major compliance</b> -	In the Policy among other has stated that the organization shall endeavor to; a) to implement good manufacturing processed and effective practices measures to avoid or mitigate any adverse impact to the environment and ecosystem within and around its operations.	Complied

Criterion / Indicator		Assessment Findings	Compliance																
		b) Reduce all relevant significant emissions from biomass production, conversion process and transportation																	
<b>Criterion 4.1.2 – Internal Audit</b>																			
<b>4.1.2.1</b>	<p>Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.</p> <p><b>- Major compliance -</b></p>	<p>Internal audits are performed once annually. The recent internal audits for the estates were held accordingly as stated below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Date audited</th> <th>Findings /observation</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>G Layang</td> <td>24/6/2020</td> <td>9 OFI on documentation</td> </tr> <tr> <td>2</td> <td>G Tanjung</td> <td>25/6/2020</td> <td>1 Major NCR 6 OFI documents.</td> </tr> <tr> <td>3</td> <td>G Lworthy</td> <td>23/6/2020</td> <td>16 OFI practices/documentation</td> </tr> </tbody> </table> <p>The audits prior was on on Sept/October 2019. Mainly audit will be made in preparation for the external audits i.e RSPO/MSPO. The frequency is amendable subject to the findings of an audit and also that all OUs are to be audited at a frequency of not less than once a year.</p>	No	Estate	Date audited	Findings /observation	1	G Layang	24/6/2020	9 OFI on documentation	2	G Tanjung	25/6/2020	1 Major NCR 6 OFI documents.	3	G Lworthy	23/6/2020	16 OFI practices/documentation	Complied
No	Estate	Date audited	Findings /observation																
1	G Layang	24/6/2020	9 OFI on documentation																
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3	G Lworthy	23/6/2020	16 OFI practices/documentation																
<b>4.1.2.2</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>There is an SOP established dated 25/8/18 total of 7 pages available in the Sustainable Management Procedure Manual SMP-GPB-03 Therein describing procedure to conduct internal audits, role of auditors, closure of NCR etc. Records were maintained for a period of 10 years. relation to the internal matters. Audit plan was provided to the estates/mill to be visited via email dated 23/6/20 (revision).</p>	Complied																



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Criterion / Indicator		Assessment Findings	Compliance
<b>4.1.2.3</b>	Report shall be made available to the management for their review. <b>- Major compliance -</b>	Reports are made available to the respective Head Of Department and the General Manager - Estates. Comments if any were also highlighted during the management review. All reports were sighted and verified.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. <b>- Major compliance -</b>	<p>A Management Review was held on 02/7/20 consolidating all estates and mill within the CU attended by 16 participants mainly the Managers, Assistants and the Sustainable Dept personnel among others. The agenda discussed on the following;</p> <ul style="list-style-type: none"> <li>a) Changes, improvement and modification of sustainability management system</li> <li>b) Complaint and grievance</li> <li>c) Stakeholders issue</li> <li>d) Continual improvement</li> <li>e) Training</li> <li>f) Legal and other requirement</li> <li>g) Internal and external audit findings</li> <li>h) Customer feedback</li> </ul> <p>Previous meeting was dated on 31/10/2019. the minutes of meeting was sighted and verified.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance																																							
<b>Criterion 4.1.4 – Continual Improvement</b>																																									
<p><b>4.1.4.1</b> The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p><b>- Major compliance -</b></p>	<p>The estates have established continual improvement plan revised in June 2020 upon consideration of the social and environmental impacts. Among others efforts are;</p> <table border="1" data-bbox="1095 667 1843 1273"> <thead> <tr> <th></th> <th>Program</th> <th>Action /Initiatives</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Chemical</td> <td>Manual grass cutting</td> </tr> <tr> <td></td> <td>Reduction</td> <td>Only circle and strip spraying in fields</td> </tr> <tr> <td></td> <td></td> <td>Apply low volume spraying equipment</td> </tr> <tr> <td></td> <td></td> <td>Follow manufacturer dosage</td> </tr> <tr> <td></td> <td></td> <td>Cattle integration - grassing in field.</td> </tr> <tr> <td>2</td> <td>Waste</td> <td>Awareness among employees</td> </tr> <tr> <td></td> <td>reduction</td> <td>Enhancement of waste segregation.</td> </tr> <tr> <td>3</td> <td>Employment</td> <td>Enhancement of workers quarters</td> </tr> <tr> <td></td> <td>condition</td> <td>Schedule repair and painting</td> </tr> <tr> <td></td> <td></td> <td>Conducive environment</td> </tr> <tr> <td>4</td> <td>Labour ratio</td> <td>Expansion of in-field FFB "semut" collection</td> </tr> <tr> <td></td> <td></td> <td>Expand mechanisation in manuring</td> </tr> </tbody> </table>		Program	Action /Initiatives	1	Chemical	Manual grass cutting		Reduction	Only circle and strip spraying in fields			Apply low volume spraying equipment			Follow manufacturer dosage			Cattle integration - grassing in field.	2	Waste	Awareness among employees		reduction	Enhancement of waste segregation.	3	Employment	Enhancement of workers quarters		condition	Schedule repair and painting			Conducive environment	4	Labour ratio	Expansion of in-field FFB "semut" collection			Expand mechanisation in manuring	<p>Complied</p>
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		Expand mechanisation in manuring																																							
<p><b>4.1.4.2</b> The company shall establish a system to improve practices in line with new information and techniques or new industry</p>	<p>This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development</p>	<p>Complied</p>																																							

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	standards and technology (where applicable) that are available and feasible for adoption. <b>- Major compliance -</b>	during the monthly management meetings. Dissemination of information by the GM and higher Head Of Department are transacted during the monthly Managers meetings and emails. Provision of machine and other major requirement are made in CAPEX budget.	
<b>4.1.4.3</b>	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. <b>- Major compliance -</b>	Where introduction of new machines and new work method, all level of employees will be trained to handle /implement the new techniques and work changes. Monitoring is made by the Estate Managers and Assistants throughout the on-the-job training and familiarization.	Complied
<b>4.2 Principle 2: Transparency</b>			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
<b>4.2.1.1</b>	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. <b>- Major compliance -</b>	Genting Tanjung Palm Oil Mill and its supply bases are transparent and open to communicate its information on environmental, social and legal issues relevant to sustainability practice to the public, e.g. <ul style="list-style-type: none"> <li>• Company annual report</li> <li>• Group policies</li> <li>• Reports related to environment i.e. EAI (Environmental Aspect Impact Assessment), EIA (environmental Impact Assessment etc.</li> <li>• MSPO/RSPO external audit reports</li> <li>• Pollution prevention plan</li> <li>• Continuous improvement plan</li> <li>• Complaints and grievances book and its procedure</li> <li>• Negotiation and compensation procedure</li> <li>• Sexual harassment procedure</li> <li>• Estate/mill maps and land titles</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>Any reports or information related to HCV area</li> <li>Any reports or information related to social i.e. SIA</li> <li>RSPO internal audit report</li> </ul> <p>This is addressed in its Sustainability Management Procedure Manual, Procedures on Request and Responses [SMP-GPB-25, rev. 00, 14/8/2014]. Means of communication is spelt out in clause 3.1.1 of the procedure e.g. meetings, telephone, walk in to office, letter, e-mail, fax, etc.</p>	
<b>4.2.1.2</b>	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p><b>- Major compliance -</b></p>	<p>The management documents which are publicly available are mentioned in Indicator 4.2.1.1. Any request of information shall be recorded in "Enquiry Register Book" (ref.: Clause 3.1.2 of the above procedure). Verification of the book showed that there has been no request made of the above-mentioned subjects ever since the last assessment.</p>	Complied
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p><b>- Major compliance -</b></p>	<p>Procedure is available entitled Sustainability Management Procedure Manual, Consultation and Communication [SMP-GPB-17, rev. 02, 23/2/2018].</p>	Complied
<b>4.2.2.2</b>	<p>A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.</p> <p><b>- Minor compliance -</b></p>	<p>All issues and grievances are handled by the Manager of each operating unit. If the issue happened be beyond the manager jurisdiction, it shall be forwarded to the Head Office.</p>	Complied
<b>4.2.2.3</b>	<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>The list of stakeholders was last updated in June 2020 which consists of government agency, suppliers/contractors, FFB suppliers and surrounding communities. There have been two meetings with the stakeholders i.e. on 30/10/2019 (external stakeholders – government agencies), 21/10/2019</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- <b>Major compliance</b> -	(external stakeholders – contractors & suppliers). Apart from that each estate and mill had also organised their own internal stakeholders’ meetings. Minutes of meetings were available for verification. Generally, among the agenda discussed were company’s policies, legal compliance issues, FFB pricing mechanism, harvesting standard, safety and environmental issues, sustainability standard requirements (e.g. RSPO P&C, MSPO, ISCC) and handling of complaints/grievances mechanism.	
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - <b>Major compliance</b> -	The traceability implementation is addressed in a procedure, SMPM, Traceability (Estate) [SMP-GPB-09, rev. 4, 24/8/2018].	Complied
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system. - <b>Major compliance</b> -	Inspection on compliance with the traceability procedure is regularly checked through supply chain internal audit. The internal audit report, which was carried out together with other schemes such as RSPO and ISCC, was available for verification.	Complied
<b>4.2.3.3</b>	The management should identify and assign suitable employees to implement and maintain the traceability system. - <b>Minor compliance</b> -	The Estate Managers are the person assigned to implement and maintain the traceability system.	Complied
<b>4.2.3.4</b>	Records of sales, delivery or transportation of FFB shall be maintained. - <b>Major compliance</b> -	The records and documents related to FFB traceability such as bunch chit, weighbridge tickets and daily FFB delivery records were adequately maintained.	Complied

Criterion / Indicator	Assessment Findings	Compliance																																								
<b>4.3 Principle 3: Compliance to legal requirements</b>																																										
<b>Criterion 4.3.1 – Regulatory requirements</b>																																										
<b>4.3.1.1</b>	<p>All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p><b>- Major compliance -</b></p>	<p>The estates continued to comply with legal requirements. Compliance to each applicable law and regulation is monitored by estate management, Regional Office and Sustainability Department. The licenses and permits governed by the Local, State and Federal authorities among others as shown below;</p> <table border="1" data-bbox="1088 775 1883 1350"> <thead> <tr> <th></th> <th>License / Permits</th> <th>Validity / ref</th> </tr> </thead> <tbody> <tr> <td></td> <td colspan="2"><i>Genting Layang Estate</i></td> </tr> <tr> <td>1</td> <td>CF DOSH air compressor-SD PMT 1925406</td> <td>04/11/2020</td> </tr> <tr> <td>2</td> <td>KPDNKK ref S 002494 - diesel 18000 L</td> <td>16/5/2021</td> </tr> <tr> <td>3</td> <td>Permit Potongan Daripada Gaji pekerja, Seksyen</td> <td>19/6/2021</td> </tr> <tr> <td>-</td> <td>113(4), Ordinan Buruh (Sabah 67)</td> <td>-</td> </tr> <tr> <td>4</td> <td>Lesen utk Menggaji Pekerja Bkn Pemastautin,</td> <td>4/1/1261/392</td> </tr> <tr> <td>-</td> <td>Seksyen 118, Ordinan Buruh,</td> <td></td> </tr> <tr> <td>5</td> <td>MPOB License 5047598-2000</td> <td>30/6/2021</td> </tr> <tr> <td>6</td> <td>Lagenda Bumimas Sdn Bhd ref.</td> <td>3440003442</td> </tr> <tr> <td>7</td> <td>Lesen P/Pasangan Persendirian Akta Bekalan</td> <td>04/7/2021</td> </tr> <tr> <td>-</td> <td>Elektrik ref. 36669</td> <td>-</td> </tr> <tr> <td>8</td> <td>Kapal Kecil Berlesen Sabah ref SN1036/4/9</td> <td>08/10/2020</td> </tr> </tbody> </table>		License / Permits	Validity / ref		<i>Genting Layang Estate</i>		1	CF DOSH air compressor-SD PMT 1925406	04/11/2020	2	KPDNKK ref S 002494 - diesel 18000 L	16/5/2021	3	Permit Potongan Daripada Gaji pekerja, Seksyen	19/6/2021	-	113(4), Ordinan Buruh (Sabah 67)	-	4	Lesen utk Menggaji Pekerja Bkn Pemastautin,	4/1/1261/392	-	Seksyen 118, Ordinan Buruh,		5	MPOB License 5047598-2000	30/6/2021	6	Lagenda Bumimas Sdn Bhd ref.	3440003442	7	Lesen P/Pasangan Persendirian Akta Bekalan	04/7/2021	-	Elektrik ref. 36669	-	8	Kapal Kecil Berlesen Sabah ref SN1036/4/9	08/10/2020	<p>Complied</p>
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Criterion / Indicator		Assessment Findings			Compliance
			<i>Genting Tanjung Estate</i>		
		1	CF DOSH air compressor-SD PMT 10428	06/1/2021	
		2	Permit Potongan Daripada Gaji pekerja, Seksyen 113(4), Ordinan Buruh (Sabah 67)	09/12/2021	
		3	Lesen utk Menggaji Pekerja Bkn Pemastautin, Seksyen 118, Ordinan Buruh,	13/5/2021	
		4	MPOB License 502249802-000	31/8/2020	
		5	MPOB License 577037111-000	30/9/2020	
		6	Trading license Perladangan K Sawit No A292596	31/12/2020	
		7	KPDNKK 35000 L ref S014164	17/5/21	
			<i>Genting Landworthy Estate</i>		
		1	CF DOSH air compressor-SD PMT 1929802	01/03/2021	
		2	Permit Potongan Daripada Gaji pekerja, Seksyen 113(4), Ordinan Buruh (Sabah 67) ref 20190026	-	
		3	Lesen utk Menggaji Pekerja Bkn Pemastautin, Seksyen 118, Ordinan Buruh,	13/5/2021	
		4	MPOB License 50382710-200	31/01/2021	
		5	Trading license Perladangan Kelapa Sawit	31/12/2020	
		6	MPOB License 61869901000 Nursery	31/01/2021	
		7	Lesen P/Psgn Persendirian Akta Bekalan Elektrik	13/12/2020	

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		8	KPDNKK ref S 000656 Disel 20000L	23/06/2021	
<b>4.3.1.2</b>	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>The Legal Requirements Register (LRR) covers all the necessary regulatory requirements. The LRR for was reviewed annually. The list of applicable legal and other requirements was made available during the assessment and complied in the Sustainability Management Procedure Manual SMP-GPB-22 having revision no. 6. The list comprises of the following sections</p> <ul style="list-style-type: none"> <li>a) Environment / Safety &amp; Health / Social</li> <li>b) Best practices &amp; other requirements</li> <li>c) International Standards Requirement</li> </ul> <p>Among others the identified applicable laws and regulations relevant to its operations included the;</p> <ul style="list-style-type: none"> <li>a) Environmental Quality Act 1974 and its Regulations,</li> <li>b) Factories and Machinery Act 1967 and its Regulations,</li> <li>c) Occupational Safety and Health Act 1994 and its Regulations,</li> <li>d) Pesticides Act, 1974,</li> <li>e) Worker’s Minimum Standards Housing &amp; Amenities Act, 1990.</li> <li>f) Wildlife conservation Act 2010</li> <li>g) Malaysian Palm Oil Board 1998</li> <li>h) Holiday Act 1951</li> <li>i) Land Ordinance (Amended Ordinance)</li> </ul>			Complied



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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> <li>j) Forest Enactment 1968 (Sabah No 2 of 1968)</li> <li>k) Native Courts Ordinance 1992</li> <li>l) Passport Act 1966 / Workers Union Act 1959</li> <li>m) Estate Hospital Assistants (Registration) Act 1965</li> <li>n) Petroleum (safety Measures) Act 1984</li> <li>o) Fire Services Act 1984 /</li> <li>p) Sales Tax Act 1972 – Sabah No 9 of 1972.</li> <li>q) Uniform Building By Laws 1986</li> <li>r) Weights And Measures Act 1972 (Act 71) (Amendment 1981)</li> <li>s) Minimum Wages Order 2018</li> <li>t) Drainage and Irrigation Ordinance 1956</li> <li>u) Sabah water resources enactment 2002</li> <li>v) EIA Order 2005 / Wildlife Conservation Enactment 1997</li> <li>w) Employment Insurance Scheme Act 2017</li> <li>x) Sabah Labour Ordinance Cap 67, 1950</li> </ul>	

Criterion / Indicator	Assessment Findings	Compliance												
<p><b>4.3.1.3</b></p> <p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p><b>- Major compliance -</b></p>	<p>The Sustainability Department SD, based Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills. SD which is based in <i>Wisma Genting</i> is responsible for tracking any changes to the Acts and Regulations. In addition, the SVP Processing (Malaysia) also played a role in disseminating new Acts &amp; Regulations to all the estates in the Group.</p> <ul style="list-style-type: none"> <li>a) This was made via communication with the publisher of the documents.</li> <li>b) This mechanism was outlined in the procedure.</li> <li>c) The updating of the legal register is made on a periodical basis.</li> <li>d) Changes in the legal register if any are communicated to the respective regions.</li> </ul> <p>a) The mill had entirely adopted the GPB established documented system for identifying, tracking, accessing and updating the legal requirements. It had ensured that all applicable legal requirements pertaining to MSPO are established, implemented and maintained. The latest revision on the LRR was made dated Jan 2020 and 10/6/2020 on the following changes;</p> <table border="1" data-bbox="1122 1201 1856 1334"> <thead> <tr> <th>No</th> <th>Rev date</th> <th>Title</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>20/1/20</td> <td>Ethical business Conduct Land</td> <td>Newly added</td> </tr> <tr> <td>2</td> <td>10/6/20</td> <td>Perintah Kaw Pergerakan 2020</td> <td>Newly added</td> </tr> </tbody> </table>	No	Rev date	Title	Remarks	1	20/1/20	Ethical business Conduct Land	Newly added	2	10/6/20	Perintah Kaw Pergerakan 2020	Newly added	<p>Complied</p>
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		3	10/6/20	Akta Pencegahan/Pengawalan Penyakit Berjangkit	Newly added																	
<b>4.3.1.4</b>	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p><b>- Minor compliance -</b></p>	<p>The Estate Managers appoint the Chief Clerks as the PIC for updating changes in laws at GTPE. Respective letters as follows were sighted and verified.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>PIC</th> <th>Date of appointment</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>G Tanjung</td> <td>Chief Clerk</td> <td>17/01/2018</td> </tr> <tr> <td>2</td> <td>G Layang</td> <td>Chief Clerk</td> <td>25/3/2020</td> </tr> <tr> <td>3</td> <td>G Lworthy</td> <td>Chief Clerk</td> <td>20/9/2018</td> </tr> </tbody> </table>					Estate	PIC	Date of appointment	1	G Tanjung	Chief Clerk	17/01/2018	2	G Layang	Chief Clerk	25/3/2020	3	G Lworthy	Chief Clerk	20/9/2018	Complied
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<b>Criterion 4.3.2 – Lands use rights</b>																						
<b>4.3.2.1</b>	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p><b>- Major compliance -</b></p>	<p><u>GLYE</u></p> <ul style="list-style-type: none"> <li>- CL095318817, lease period 1/1/1992 to 31/12/2090, 1,683 Ha, leasee: Asiatic Development Bhd</li> <li>- CL095317463, lease period 1/1/1990 to 31/12/2088, 4,047 Ha, leasee: Asiatic Development Bhd 394.41 Ha is managed by GLYE</li> </ul> <p><u>GLWE</u></p> <p>CL095316975, lease period 1/1/1985 to 31/12/2083, 4,039 Ha, leasee: Landworthy Sdn Bhd, Landworthy Sdn Bhd (Sri Landworthy Estate), 4,039 Ha</p>				Complied																

Criterion / Indicator		Assessment Findings	Compliance																										
		<p><u>GTJE</u></p> <ul style="list-style-type: none"> <li>- CL095316993, lease period 1/1/1988 to 31/12/2086, 8,094 Ha, leasee: Tanjung Bahagia Sdn Bhd – shared with Genting Bahagia Estate i.e. 4,273.87 Ha for GTJE and 3,820.04 Ha for GBGE</li> <li>- CL095327129, lease period 1/1/1998 to 31/12/2096, 192.40 Ha, leasee: Kinavest Sdn Bhd</li> </ul>																											
<b>4.3.2.2</b>	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p><b>- Major compliance -</b></p>	<p>The estates operate on a legal ownership of land. Details as provided below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Estate</th> <th>No hak milik</th> <th>Expiry</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1</td> <td rowspan="2">Genting Tanjung</td> <td>CL095316993</td> <td>31/12/2086</td> <td>4273.87</td> </tr> <tr> <td>CL095327129</td> <td>31/12/2096</td> <td>192.40</td> </tr> <tr> <td rowspan="2">2</td> <td rowspan="2">Genting Layang</td> <td>CL095318817</td> <td>31/12/2090</td> <td>1683.0</td> </tr> <tr> <td>CL095317463</td> <td>31/12/2088</td> <td>394.41</td> </tr> <tr> <td>3</td> <td>G L/worthy</td> <td>CL095316975</td> <td>31/12/2083</td> <td>4039.00</td> </tr> </tbody> </table> <p>The land is for the purpose of cultivation of oil palm agricultural crop of economic value. All documents were sighted and verified.</p>	No	Estate	No hak milik	Expiry	Ha	1	Genting Tanjung	CL095316993	31/12/2086	4273.87	CL095327129	31/12/2096	192.40	2	Genting Layang	CL095318817	31/12/2090	1683.0	CL095317463	31/12/2088	394.41	3	G L/worthy	CL095316975	31/12/2083	4039.00	Complied
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<b>4.3.2.3</b>	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where</p>	<p>The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 3 estates, during the field inspection</p>	Complied																										

Criterion / Indicator		Assessment Findings	Compliance																												
	<p>practicable.</p> <p><b>- Major compliance -</b></p>	<p>confirmed that they were clearly marked and maintained. All the physical markers/Boundary stones along the legal boundaries between was visibly available.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Boundary</th> <th>Neighbouring</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>G Tanjung</td> <td>P19 Blc 06</td> <td>Hari Maju Estate</td> </tr> <tr> <td>2</td> <td>G Tanjung</td> <td>P10 Blc 02</td> <td>Eco tunera Estate</td> </tr> <tr> <td>3</td> <td>G Layang</td> <td>P99 Blc 22</td> <td>Malbumi Estate</td> </tr> <tr> <td>4</td> <td>G Layang</td> <td>P00 Blc 2A</td> <td>Teh Ah Bu Estate.</td> </tr> <tr> <td>5</td> <td>G Lworthy</td> <td>P95 Blc 18</td> <td>JC Chang Estate</td> </tr> <tr> <td>6</td> <td>G Lworthy</td> <td>P96 Blc 56</td> <td>Morisen Estate IOI</td> </tr> </tbody> </table>		Estate	Boundary	Neighbouring	1	G Tanjung	P19 Blc 06	Hari Maju Estate	2	G Tanjung	P10 Blc 02	Eco tunera Estate	3	G Layang	P99 Blc 22	Malbumi Estate	4	G Layang	P00 Blc 2A	Teh Ah Bu Estate.	5	G Lworthy	P95 Blc 18	JC Chang Estate	6	G Lworthy	P96 Blc 56	Morisen Estate IOI	
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<b>4.3.2.4</b>	<p>Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC).</p> <p><b>- Minor compliance -</b></p>	<p>There was no dispute reported. The estates are surrounded by other plantation companies such as IOI Morisem, Wingking Plantation, Ace Foremost JC Chang’s Hwa Li estates. Should there be any dispute, the Sustainability Management Procedure for Negotiation, Compensation and Handling Procedure; SMP-GPB-18; Rev. 03; dated 29/12/2017 will be utilised.</p>	Complied																												
<b>Criterion 4.3.3 – Customary rights</b>																															
<b>4.3.3.1</b>	<p>Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.</p> <p><b>- Major compliance -</b></p>	<p>No land is encumbered by customary rights.</p>	Complied																												

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4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. - <b>Minor compliance</b> -	No land is encumbered by customary rights.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - <b>Major compliance</b> -	No land is encumbered by customary rights.	Complied
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - <b>Minor compliance</b> -	<p>The Social assessment for all the visited estates was conducted internally by the Sustainability Department. The last SIA was conducted in October 2018. Key areas identified in the SIA were on economic livelihood/quality of life, environment and health, wellbeing and community, families and individuals. Both positive and negative impacts were identified in the SIA.</p> <p>The recommendation from the SIA report was transferred to action plan. The action plan identified the issues &amp; strategies, action plan, responsible person and time frame for both positive and negative impact.</p> <p>The Police Dept. at Kinabatangan has advised Genting Tanjung certification unit to report any workers abscondence. At GLYE, a police report was made on 28/11/2019 with regards to abscondence of two workers.</p>	Complied
<b>Criterion 4.4.2: Complaints and grievances</b>			

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4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - <b>Major compliance</b> -	A system for dealing with complaints and grievances is written under Sustainability Management Procedure Manual, SMPGPB- 17: Procedures for Consultation and Communication, rev:02 dated 8/1/2018.	Complied
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - <b>Major compliance</b> -	All complaints were resolved in timely manner. Acknowledgement by signatures of the complainant were available in the complaint/grievance book form.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - <b>Minor compliance</b> -	Complaint forms were available in Complaints/Grievances Record Book. The format includes the information such as name of complainant, passport/NRIC, phone no., address, issue, date of complaint, details of action taken, verification by manager and acknowledgement by complainant.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - <b>Minor compliance</b> -	Made aware through stakeholders' meetings. Minutes of meeting were available for verification. The last meeting was conducted in October 2019 and the next one is planned in October 2020.	Complied
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - <b>Major compliance</b> -	Based on verification of the Complaint/Grievance Book, the last 24 months records were still available at all the visited estates.	Non-conformity
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			

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<b>4.4.3.1</b>	<p>Growers should contribute to local development in consultation with the local communities.</p> <p><b>- Minor compliance -</b></p>	<p>Since the last assessment, there was not much contribution to local development due to less activities organised by the local communities and coupled with the Movement Control Order.</p> <p>Nonetheless, the certification unit has organised a polio vaccination for all the workers dependants with cooperation from Klinik Kesihatan Kinabatangan. Apart from that distribution of beef to all the workers during Hari Raya Korban was also done.</p>	Complied
<b>Criterion 4.4.4: Employees safety and health</b>			
<b>4.4.4.1</b>	<p>An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>The Safety Policy signed the President /Chief Operating Procedure dated 01/7/18 has been established. Therein containing among others the following;</p> <ul style="list-style-type: none"> <li>a) To maintain a safe and healthy working environment for all employees /others</li> <li>b) To comply with all applicable safety legislation, code of practice, requirement.</li> <li>c) Create awareness by providing all relevant information, WI, supervision and training to employees.</li> <li>d) Prevent accidents, injuries, and occupational illness as well as conduct investigations and take necessary steps/actions to ensure such accidents do not recur</li> <li>e) All employees shall be responsible and accountable to achieve the above mentioned practices.</li> </ul>	Complied



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<p><b>4.4.4.2</b> The occupational safety and health plan shall cover the following:</p> <ul style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risks of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:               <ul style="list-style-type: none"> <li>i. all employees involved shall be adequately trained on safe working practices</li> <li>ii. all precautions attached to products shall be properly observed and applied</li> </ul> </li> <li>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</li> <li>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</li> <li>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</li> </ul>	<p>The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following;</p> <ul style="list-style-type: none"> <li>a) Change in work process</li> <li>b) Revision/changes in legislative requirement</li> <li>c) Occurrence of accidents</li> </ul> <p>The estates had list of review on HIRARC dated 08/2/2018 to 25/1/19</p> <table border="1" data-bbox="1093 839 1854 1177"> <thead> <tr> <th></th> <th>Areas/Activities</th> <th></th> <th>Areas /Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Palm /bunch census</td> <td>11</td> <td>Harvesting &amp; collection</td> </tr> <tr> <td>2</td> <td>Circle /selective spraying</td> <td>12</td> <td>Transportation workers</td> </tr> <tr> <td>3</td> <td>Confined space</td> <td>13</td> <td>Walking palm to palm</td> </tr> <tr> <td>4</td> <td>Drainage-machine/ manual</td> <td>14</td> <td>Loose fruit collection</td> </tr> <tr> <td>5</td> <td>Grass cutting</td> <td>15</td> <td>In field machine 15 mt</td> </tr> <tr> <td>6</td> <td>Compound sanitation</td> <td>16</td> <td>Water catchment</td> </tr> <tr> <td>7</td> <td>Fertilizer application</td> <td>17</td> <td>Chemical mixing</td> </tr> <tr> <td>8</td> <td>Replanting</td> <td>18</td> <td>Nursery</td> </tr> <tr> <td>9</td> <td>Bridge maintenance</td> <td>19</td> <td>Workers quarters</td> </tr> <tr> <td>10</td> <td>Water treatment plant</td> <td>20</td> <td>Buffalo system</td> </tr> </tbody> </table> <p>Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were</p>		Areas/Activities		Areas /Activities	1	Palm /bunch census	11	Harvesting & collection	2	Circle /selective spraying	12	Transportation workers	3	Confined space	13	Walking palm to palm	4	Drainage-machine/ manual	14	Loose fruit collection	5	Grass cutting	15	In field machine 15 mt	6	Compound sanitation	16	Water catchment	7	Fertilizer application	17	Chemical mixing	8	Replanting	18	Nursery	9	Bridge maintenance	19	Workers quarters	10	Water treatment plant	20	Buffalo system	<p>Complied</p>
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<p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee’s health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>displayed at all work stations in the mill and estate office and workshop. In general, the control measures were appropriate to the identified risks.</p> <p>The estates conduct CHRA. Details as follows</p> <table border="1" data-bbox="1115 593 1818 778"> <thead> <tr> <th></th> <th>Estate</th> <th>Assessor</th> <th>Date of CHRA</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>G Layang</td> <td>QMSPRO Sdn Bhd HQ/03/ASS/00/154</td> <td>Mac 2019-Oct 2010</td> </tr> <tr> <td>2</td> <td>G Lworthy</td> <td>HQ/03/ASS/00/236</td> <td>Mac 2019-Oct 2010</td> </tr> <tr> <td>3</td> <td>G Tanjung</td> <td></td> <td>Mac 2019-Oct 2010</td> </tr> </tbody> </table> <p>Medical surveillance as proposed in the CHRA was performed by an OHD DOSH <i>registration no HQ/12/DOC/00/259 Klinik Elapora Sandakan</i>. The results for the entire team were positive and declared FIT to perform assigned duties in chemical. The session for 2020 had been planned with deferment as results of MCO restriction.</p> <table border="1" data-bbox="1093 992 1877 1082"> <thead> <tr> <th>Estate</th> <th>Date</th> <th>Sprayer</th> <th>W/shop</th> <th>Store</th> <th>WTP</th> <th>Fertilizer</th> </tr> </thead> <tbody> <tr> <td>G Tanjung</td> <td>13/2/19</td> <td>44</td> <td>1</td> <td>2</td> <td>1</td> <td>36</td> </tr> <tr> <td>G Lwrthy</td> <td>13/2/19</td> <td>18</td> <td>3</td> <td>2</td> <td>1</td> <td>20</td> </tr> </tbody> </table> <p>The estates provide PPE to the employees such as apron, safety helmets, and safety shoes relevant to the work handled by the workers. Records of PPE issuance for the estate were sighted. During the site visit workers was observed to be in PPE. Based on the HIRARC carried out at the estates the PPE types for the various activities has been identified and implemented.</p> <p>a) Harvester- Safety helmet, sickle cover, hand glove. wellington boots</p>		Estate	Assessor	Date of CHRA	1	G Layang	QMSPRO Sdn Bhd HQ/03/ASS/00/154	Mac 2019-Oct 2010	2	G Lworthy	HQ/03/ASS/00/236	Mac 2019-Oct 2010	3	G Tanjung		Mac 2019-Oct 2010	Estate	Date	Sprayer	W/shop	Store	WTP	Fertilizer	G Tanjung	13/2/19	44	1	2	1	36	G Lwrthy	13/2/19	18	3	2	1	20	
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	<p>b) Sprayers- Respirator, nitrile glove (chemical resistant) goggles, wellington boots, apron.</p> <p>c) Manuring- Apron, wellington boots, dust mask, nitrile glove.</p> <p>d) Water treatment Plant Operator - Safety boots, ear muff, safety vest, helmet, cotton glove, dust mask.</p> <p>Sighted issuance of PPE records for the estates employees in 2020.</p> <p>The estate management conducts regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held are recorded below. Genting Landworthy had missed 2 sessions in view of the recent MCO restriction.</p> <table border="1" data-bbox="1081 874 1850 1059"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Ist</th> <th>2nd</th> <th>3rd</th> <th>4th</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>G Layang</td> <td>22/6/20</td> <td>24/3/20</td> <td>19/12/19</td> <td>03/9/19</td> </tr> <tr> <td>2</td> <td>G Tanjung</td> <td>26/6/20</td> <td>26/3/20</td> <td>20/12/19</td> <td>27/9/19</td> </tr> <tr> <td>3</td> <td>G lwothy</td> <td>-</td> <td>-</td> <td>15/1/20</td> <td>12/07/19</td> </tr> </tbody> </table> <p>Agenda discussed among others;</p> <ul style="list-style-type: none"> <li>a) Confirmation of minutes previous meeting</li> <li>b) Workplace inspection report</li> <li>c) Accident report</li> <li>d) Medical surveillance &amp; Audio metric</li> </ul>	No	Estate	Ist	2nd	3rd	4th	1	G Layang	22/6/20	24/3/20	19/12/19	03/9/19	2	G Tanjung	26/6/20	26/3/20	20/12/19	27/9/19	3	G lwothy	-	-	15/1/20	12/07/19	
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	<p>e) Status of Safety Program &amp; Environmental</p> <p>f) First Aid Kit &amp; Fire Extinguishers Report</p> <p>g) HIRARC</p> <p>h) Complaint from Employee/External Party.</p> <p>i) Other matters</p> <p>Workplace inspections are made prior to the OSH meeting.</p> <p>The respective Managers were appointed as ESH Chairman through letter signed by Vice President Plantation (Sabah Region 2). All letters were sighted and verified.</p> <table border="1" data-bbox="1182 901 1765 1088"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Chairman</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Genting Layang</td> <td>Manager</td> <td>20/3/20</td> </tr> <tr> <td>2</td> <td>Genting Tanjung</td> <td>Manager</td> <td>23/6/20</td> </tr> <tr> <td>3</td> <td>Genting Landworthy</td> <td>Manager</td> <td>23/6/20</td> </tr> </tbody> </table> <p>The procedures for accident and emergencies has been established. There is formation of ERP Team &amp; ERP for all the identified incidences. In addition the procedures have been summarized in a chart flow form and displayed for information of all employees in the estate. They includes emergencies relating fire, chemical spillage, flood and accident at work place.</p> <p>a) <i>Ahli J/Kuasa Pasukan Bertindak Kecemasan 2020</i> headed by the Estate Manager</p> <p>b) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Kebakaran</i></p>	No	Estate	Chairman	Date	1	Genting Layang	Manager	20/3/20	2	Genting Tanjung	Manager	23/6/20	3	Genting Landworthy	Manager	23/6/20	
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	<p>c) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Banjir</i>                      d) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Kimia</i></p> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SD and amended to tailor to the situation differences in the estates and mill.</p> <table border="1" data-bbox="1189 802 1738 1129"> <thead> <tr> <th></th> <th>Emergency situation</th> <th>Mill</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Fire</td> <td>/</td> <td>/</td> </tr> <tr> <td>2</td> <td>Oil spillage</td> <td>/</td> <td></td> </tr> <tr> <td>3</td> <td>Effluent overflow</td> <td>/</td> <td></td> </tr> <tr> <td>4</td> <td>Chemical spillage</td> <td>/</td> <td>/</td> </tr> <tr> <td>5</td> <td>Flood</td> <td></td> <td>/</td> </tr> <tr> <td>6</td> <td>Accident at work place</td> <td></td> <td>/</td> </tr> </tbody> </table> <p>ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The training are conducted by an accredited or qualified organization who can demonstrate their suitability to provide training.</p> <p>The trained personnel for the First Aid were among the employees working as field staff/mandores. The first aid boxes were available at various points</p>		Emergency situation	Mill	Estate	1	Fire	/	/	2	Oil spillage	/		3	Effluent overflow	/		4	Chemical spillage	/	/	5	Flood		/	6	Accident at work place		/	
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		<p>in the estate office, workshop, and store. The estate distributed the first aid box to the mandores and brought along to the field during operations. In addition, there are also first aid boxes kept in the office, store and workshops</p> <p>Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKPP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKPP 8 a mandatory requirement with submission as follows. Accident Statistics are being maintained in a satisfactory manner</p> <p>Genting Tanjung Estate had 1 case of 25 days LTI dated 08/7/2019. A</p> <table border="1"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="4">No of cases in 2019</th> <th rowspan="2">JKPP 8 submission</th> </tr> <tr> <th>cases</th> <th>LTI</th> <th>Non LTI</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>1 G Tanjung</td> <td>5</td> <td>41</td> <td>0</td> <td>5</td> <td>10/1/2020</td> </tr> <tr> <td>2 G Layang</td> <td>1</td> <td>2</td> <td>0</td> <td>1</td> <td>03/1/2020</td> </tr> <tr> <td>3 G Lworthy</td> <td>4</td> <td>7</td> <td>0</td> <td>4</td> <td>09/1/2020</td> </tr> </tbody> </table> <p>harvester felled down while riding motorcycle and injured left leg as the knife cover ruptured. HIRARC was reviewed date 09/7/2019 while training was provided to harvesters during the week. All documents including the investigation was sighted and verified.</p>	Estate	No of cases in 2019				JKPP 8 submission	cases	LTI	Non LTI	Total	1 G Tanjung	5	41	0	5	10/1/2020	2 G Layang	1	2	0	1	03/1/2020	3 G Lworthy	4	7	0	4	09/1/2020	
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<b>Criterion 4.4.5: Employment conditions</b>																															
<b>4.4.5.1</b>	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The	Covered under Genting Plantations' Social Policy (Incorporating the Labour and Human Rights requirements), dated 22/6/2015, signed by Mr. Yong	Complied																												

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	<p>policy shall be signed by the top management and effectively communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>Chee Kong (President and Chief Operating Officer). Various methods of communication implemented by the estate to communicate the policy to its employees such as display on notice boards, briefing and training.</p>	
<b>4.4.5.2</b>	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p><b>- Major compliance -</b></p>	<p>Based on interview with employees from different backgrounds, there is no evidence that the management engage in or support any discriminatory practices. The commitment to no discrimination is also stated in the company's social policy.</p>	Complied
<b>4.4.5.3</b>	<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><b>- Major compliance -</b></p>	<p>Based on sampled workers' pay slips for Dec 2019 and Jun 2020, it was found that the employer has met the pay and conditions as per agreed in the employment contract agreement.</p> <p><u>GLYE</u> employment no.: E00902, E01120, E00995, E00888, E01180, E00767</p> <p><u>GLWE</u> E02534, E01913, E02193, E00251, E02256, E02267</p> <p><u>GTJE</u> E00025, E02011, E00583, E01693, E02774, E02651</p>	Complied

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4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p><b>- Minor compliance -</b></p>	<p>There is no evidence that the management has ensured that the employees of contractors e.g. FFB and EFB transporters are paid based on legal or industry minimum standards according to the employment contract agreed between the contractors and their employees. Thus a non-conformity was assigned due to this lapse.</p>	Non-conformity
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><b>- Major compliance -</b></p>	<p>Employee data base is kept and maintained in the computer system (Lyntramax). All the required information by this standard was available in the data based.</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>Employment contracts were available in language that understood by the workers. The contract has the details about the payments and employment conditions such as period of working, working hour, medical assistance, housing, holiday, annual leave, period of notice to terminate the contract, etc.</p>	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p><b>- Major compliance -</b></p>	<p>Time recording for estate's workers was done by the field staff by using the daily check roll. The check roll has the information about attendance, type of work and overtime of every worker.</p>	Complied



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4.4.5.8	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p> <p><b>- Major compliance -</b></p>	<p>Working hours and breaks were found to be in line with the legal requirement. Normal working hour is from 0530 hour to 1330 hour and a flexible an hour break in between is given.</p>	Complied
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p><b>- Major compliance -</b></p>	<p>Based on sampled pay slips as mentioned in 4.4.5.3, generally it was found that the wages and overtime payment were in line with the employment contract.</p> <p>However, at Genting Tanjung Estate, pay slips verification of a worker (employee # E02651) showed that the wages in Dec 2019 and June 2020 were RM22.94 and RM23.74 respectively. Furthermore, verbally confirmed by the AM in-charge, the other workers performing the same task (spraying) for the same months also did not meet the legal minimum wage which is RM42.31/day. Thus, a non-conformity was assigned due to this lapse.</p>	Non-conformity
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><b>- Minor compliance -</b></p>	<p>Other benefits such as motorcycle allowance for mandore and turn-out incentives were provided by the employer and verifiable in the pay slips. The establishment of estate clinic provides the medical care for the workers and their dependents. Education through HUMANA school is provided for foreign workers dependents.</p>	Complied
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</p>	<p>Treated water is provided and analysed quarterly. The analysis report from accredited laboratory as follows were verified.</p>	Complied

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	<p>in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p><b>- Major compliance -</b></p>	<p><u>GLYE</u></p> <p>#20190405/15, #20190601/03, #W190906/06, #20191104/03, #W200313/01A and #W200313/01B</p> <p>GLWE &amp; GTJE – supplied by the mill’s water treatment plant. For analysis results, refer to Indicator 4.4.5.11 in MSPO Part 4.</p>	
<b>4.4.5.12</b>	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p><b>- Major compliance -</b></p>	<p>Sexual Harassment Policy has been established dated 3/8/2009 and signed by the Chief Operating Officer. The guidelines to prevent all forms of sexual harassment and violence entitled “<i>Panduan untuk Mencegah dan Membasmi Gangguan Seksual di Tempat Kerja</i>”, ver. 0, dated 2010 was also available for verification. Should there be any sexual harassment case, reporting shall be done in accordance to “Procedure on Prevention and Eradication of Sexual Harassment at the Workplace, rev. 00, dated 11/10/2013. The awareness of this policy among the workers was made through displaying of the policy at notice boards, talks and briefing by the field staff. E.g.:</p> <p>GLWE – conducted a meeting with workers representatives on 13/2/2020, attended by 9 key personnel.</p>	Complied
<b>4.4.5.13</b>	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and</p>	<p>There is no trade union in any of the visited estates. Nonetheless, there is also no restriction for them to join any trade union. This is recognized by the employer through establishment of people Policy dated 3/8/2009.</p>	Complied

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	negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. <b>- Major compliance -</b>																				
<b>4.4.5.14</b>	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not expose to hazardous working conditions. <b>- Major compliance -</b>	Based on the records in the employee's data base system, which has the information about date of birth and date join, there was no children and young person being employed.	Complied																		
<b>Criterion 4.4.6: Training and competency</b>																					
<b>4.4.6.1</b>	All employees, 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. <b>- Major compliance -</b>	The annual training program has been established and significantly covers all aspects of the MSPO/RSPO requirements. There were also additional subjects including the estate operating procedures, parameters, vehicles maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects. The program mainly covers both requirement of the estates and mill in the CU. The subjects for the training are issued and assisted by the SD personnel. The following topics included in the annual training program 2020 among others are extracted below;  <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">(Estate) subject</th> <th colspan="3">schedule</th> </tr> <tr> <th>1-4</th> <th>5-9</th> <th>9-12</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Requirement RSPO MSPO</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>2</td> <td>ESH policy objective, target &amp; program</td> <td>/</td> <td></td> <td></td> </tr> </tbody> </table>		(Estate) subject	schedule			1-4	5-9	9-12	1	Requirement RSPO MSPO	/			2	ESH policy objective, target & program	/			Complied
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		3	New FW – procedure	/		
		4	Duties of field staff	/		
		5	ESH role & function	/		
		6	Competency, training & awareness	/		
		7	ERP procedure and evacuation		/	
		8	Legal & other requirement		/	
		9	Permit - work/handling tools equipment	/		
		10	HIRARC & EAI		/	
		11	Non Conformity Corr/preventive action		/	
		12	Complaint & grievance procedure		/	
		13	SOP & ECP for individual procedure		/	
		14	PPE adherence		/	
		15	Scheduled waste management			/
		16	Supplier selection & evaluation		/	
		17	Estates practices SOP	/	/	/
		18	Noise training			/
		19	Riparian Zone Management	/		
		20	Sexual Harassment		/	
<b>4.4.6.2</b>	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p><b>- Major compliance -</b></p>	<p>Similar methods for identifying the training needs are used in all the estate. The details of the training needs include categories of;</p> <ul style="list-style-type: none"> <li>a) job descriptions,</li> <li>b) sections,</li> <li>c) Employees' group.</li> </ul> <p>Included in this program are subjects related to;</p> <ul style="list-style-type: none"> <li>a) environment e.g. environmental, safety &amp; health policy,</li> <li>b) scheduled waste management,</li> </ul>				Complied

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		c) environmental responsibility, HCV & Biodiversity training, d) field activities/operations, e) equipment handling, vehicles maintenance etc																																																																																																
<b>4.4.6.3</b>	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.  <b>- Minor compliance -</b>	The estates training are held/organized during the daily briefing prior to work commencement. Mainly the issues discussed / briefed were related to estate operations, environmental and safety compliance. These training records are maintained in a separate book and were sighted during the audit. <table border="1" style="margin-top: 10px;"> <thead> <tr> <th></th> <th>Subject</th> <th>GT</th> <th>GL</th> <th>GLW</th> </tr> </thead> <tbody> <tr><td>1</td><td>ERP Chemical spillage</td><td>15/7/20</td><td>-</td><td>-</td></tr> <tr><td>2</td><td>SOP Weeding / HIRARC</td><td>22/2/20</td><td>16/1/20</td><td>16/1/20</td></tr> <tr><td>3</td><td>Company Policies Briefing</td><td>24/2/20</td><td>17/10/19</td><td>01/7/20</td></tr> <tr><td>4</td><td>MSPO Briefing to Contractors</td><td>10/1/20</td><td>29/8/20</td><td>21/6/19</td></tr> <tr><td>5</td><td>Safety awareness</td><td>-</td><td>29/8/19</td><td>14/2/20</td></tr> <tr><td>6</td><td>Tractors driving SOP</td><td>-</td><td>29/8/19</td><td>26/8/19</td></tr> <tr><td>7</td><td>OSH guidelines</td><td>-</td><td>13/9/19</td><td>18/6/20</td></tr> <tr><td>8</td><td>Air compressor SOP</td><td>11/7/20</td><td>-</td><td>-</td></tr> <tr><td>9</td><td>RSPO MSPO awareness</td><td>24/2/20</td><td>26/8/19</td><td>14/10/19</td></tr> <tr><td>10</td><td>Workshop management</td><td>-</td><td>-</td><td>23/7/19</td></tr> <tr><td>11</td><td>Spraying SOP</td><td>23/2/20</td><td>23/6/20</td><td>09/7/20</td></tr> <tr><td>12</td><td>Nursery Operations</td><td>23/2/20</td><td>-</td><td>06/7/20</td></tr> <tr><td>13</td><td>Harvesting SOP</td><td>09/3/20</td><td>19/6/20</td><td>-</td></tr> <tr><td>14</td><td>Fire Drill</td><td>04/7/20</td><td>10/10/19</td><td>22/6/20</td></tr> <tr><td>15</td><td>First Aid - Refresher briefing</td><td>29/6/20</td><td>-</td><td>-</td></tr> <tr><td>16</td><td>Rat Baiting</td><td>10/3/20</td><td>-</td><td>-</td></tr> <tr><td>17</td><td>Recycling program triple rinsing</td><td>30/6/20</td><td>-</td><td>13/7/20</td></tr> <tr><td>18</td><td>PPE fit test - Spraying</td><td>12/2/20</td><td>12/2/20</td><td>-</td></tr> </tbody> </table>		Subject	GT	GL	GLW	1	ERP Chemical spillage	15/7/20	-	-	2	SOP Weeding / HIRARC	22/2/20	16/1/20	16/1/20	3	Company Policies Briefing	24/2/20	17/10/19	01/7/20	4	MSPO Briefing to Contractors	10/1/20	29/8/20	21/6/19	5	Safety awareness	-	29/8/19	14/2/20	6	Tractors driving SOP	-	29/8/19	26/8/19	7	OSH guidelines	-	13/9/19	18/6/20	8	Air compressor SOP	11/7/20	-	-	9	RSPO MSPO awareness	24/2/20	26/8/19	14/10/19	10	Workshop management	-	-	23/7/19	11	Spraying SOP	23/2/20	23/6/20	09/7/20	12	Nursery Operations	23/2/20	-	06/7/20	13	Harvesting SOP	09/3/20	19/6/20	-	14	Fire Drill	04/7/20	10/10/19	22/6/20	15	First Aid - Refresher briefing	29/6/20	-	-	16	Rat Baiting	10/3/20	-	-	17	Recycling program triple rinsing	30/6/20	-	13/7/20	18	PPE fit test - Spraying	12/2/20	12/2/20	-	Complied
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		19	Harvesting SOP	31/2/20	22/8/19	20/2/20	
		20	Gen set operations	-	06/10/19	08/6/20	
		21	Pesticides Handling	05/2/20	-	06/7/20	
		22	Chemical spraying	24/6/20	-	27/2/20	
		23	First Aid Kit & ERP handling	11/7/20	09/2/20	10/7/20	
		24	IPM management	10/3/20	24/10/19	11/3/20	
		25	Riparian Zone Protection	10/9/19	10/9/19	17/8/19	
		26	Protection of HCV riparian zone	10/3/20	-	10/3/20	
		27	fertilizer - application	10/6/20	14/3/20	17/2/20	
		28	Harvesting activities SOP	17/1/20	20/1/20	24/7/19	
		29	Riparian Zone protection	-	23/8/19	-	
		30	Driving SOP & PPE	02/7/20	26/8/19	01/7/20	
		31	PPE adherence	-	4/12/19	-	
		32	SW management	11/7/20	6/11/19	08/6/20	
		33	Covid 19 precaution	-	27/3/20	-	
		34	Covid 19 reminders	-	13/3/20	-	
		35	Sexual harassment	-	20/8/19	10/7/20	
		36	Security management despatch	27/1/20	-	18/9/19	
		37	Creche management / guideline	05/5/20	-	05/6/20	
		38	TKI induction program	30/6/20	31/1/20	25/10/19	

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

**Criterion 4.5.1: Environmental Management Plan**

<b>4.5.1.1</b>	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.  <b>- Major compliance -</b>	The Group Environmental Policy had been established and implemented for all Mills and Estates. The policy was signed by the President / Chief Operating Officer of <i>Genting Plantations Bhd</i> dated 05 Oct 2009 and displayed prominently on notice boards in English and local language <i>Bahasa Malaysia</i> . The Policy is implemented along with other Policies through the OSH activities by the on-site Safety Officers and monitored by	Complied
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Criterion / Indicator		Assessment Findings	Compliance
		<p>OSH/Sustainability Unit from Head Office. Included in the Policy among others are the following commitment;</p> <ul style="list-style-type: none"> <li>a) Commitment and protection of the environment according to the applicable laws.</li> <li>b) Establishment of environmental management plan developed from results of aspect and impact analysis, mitigation, monitoring plans and records of implementation with time lines.</li> <li>c) Continual improvement program</li> <li>d) Awareness through training / briefing program &amp; session to all employees and stakeholders.</li> </ul> <p>During interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the basic objectives and intention of the Policy.</p>	
<b>4.5.1.2</b>	<p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> <li>a) An environmental policy and objectives;</li> <li>b) The aspects and impacts analysis of all operations.</li> </ul> <p><b>- Major compliance -</b></p>	<p>The Environmental Policy was established, signed by President and Chief Operating Officer on 5th October 2009. The policy was communicated to the employees through the briefing during muster and training ad hoc basis.</p> <p>The aspects and impacts had been provided in <i>the Environmental Aspects And Impacts And Evaluation Of Significance 2020 Document no GSPE/EAI/5.1</i> reviewed in Feb 2020 compiled internally by the Sustainability Department The analysis among others had covered the following activities;</p> <ul style="list-style-type: none"> <li>a) Harvesting / weeding / fertilizer application</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>b) Mulching / road upkeep / ramp</li> <li>c) Workshop / chemical store</li> <li>d) Lubricant store / fertilizer store</li> <li>e) Oil palm thinning</li> <li>f) Building construction</li> <li>g) Drainage/nursery/replanting</li> <li>h) EFB mulching</li> <li>i) Impact of field operations activities towards environmental</li> <li>j) Identification of riparian zone</li> <li>k) All the relevant positive/negative impact &amp; mitigation plan,</li> </ul>	
<b>4.5.1.3</b>	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>The Environmental improvement and management plan was established at all the estates in the CU to include surface water runoff, water quality, chemical application, air quality, zero burning, fertilizer application and waste management.</p> <p>All the mitigation plans/objectives were established to mitigate the pollution identified. Among others, construction of terraces, planting of leguminous cover crop, construction of road site pit, clear marking for buffer one area, chemical reduction, zero burning policy, avoid fertilizer application close to waterways, proper landfill site and recyclable waste.</p>	Complied



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Criterion / Indicator		Assessment Findings				Compliance
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p><b>- Minor compliance -</b></p>	<p>The environmental improvement plans are identified <i>the Environmental Impact Assessment After Planting 2020</i> having details of mitigation of the negative impacts. They are summarized and shown below;</p>				Complied
			Activities	Impacts	Mitigation plan	
		1	harvesting	Promote positive impact to soil structure through biomass frond & EFB mulching.	Practice proper frond stacking. EFB applied to improve nutrient & biomass	
		2	weeding	Negative impact as polluting the soil with usage of chemicals.	Dosage of chemicals is monitored & calibrated. Cattle integration introduced to reduce reliance of chemical.	
		3	Manuring	Over usage of chemical & fertilizer affecting soil toxicity causing leaching /wash off.	Identify buffer zones and to prevent leaching of fertilizer and chemicals. Application along frond stacking rows.	
		4	Road upkeep	Damages through grading and chambering	Water collected at drain pits is collected to maximize moisture of nearest palm.	
		5	Loading Bay	FFB transportation of lorries in minimizing leakages of fuel	Education to drivers and monitoring of vehicles movements.	
		6	Workshop	Spillage to prevent pollution	Availability of spill kit and health surveillance for welding personnel.	

Criterion / Indicator		Assessment Findings	Compliance																																											
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><b>- Major compliance -</b></p>	<p>The 2020 training program has included the following subject in relation to the environmental education and awareness.</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">(Estate) subject</th> <th colspan="3">schedule</th> </tr> <tr> <th>1-4</th> <th>5-9</th> <th>9-12</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Requirement ISO 9001/14001/18001</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>2</td> <td>ESH policy objective, target &amp; program</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>3</td> <td>ESH role &amp; function</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>4</td> <td>ERP procedure and evacuation</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>5</td> <td>Legal &amp; other requirement</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>6</td> <td>HIRARC &amp; EAI</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>7</td> <td>Scheduled waste management</td> <td></td> <td></td> <td>/</td> </tr> </tbody> </table>		(Estate) subject	schedule			1-4	5-9	9-12	1	Requirement ISO 9001/14001/18001	/			2	ESH policy objective, target & program	/			3	ESH role & function	/			4	ERP procedure and evacuation		/		5	Legal & other requirement		/		6	HIRARC & EAI		/		7	Scheduled waste management			/	Complied
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4.5.1.6	<p>Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.</p> <p><b>- Major compliance -</b></p>	<p>Discussions on environmental issues were discussed at the following forums</p> <ul style="list-style-type: none"> <li>a) Stakeholder meetings</li> <li>b) ESH meeting on environmental issue if arises.</li> <li>c) Monthly management meeting should there be issues raised.</li> </ul> <p>The recent stakeholder meeting for Genting Landworthy Estate was held on 30/1/20. Genting Tanjung Estate had meeting external and internal on 21/10/19 and 09/8/19 respectively. Other estates had similar meetings. Mainly the discussion focused on the scheduled waste and domestic waste handling. Minutes of meeting was sighted and verified.</p>	Complied																																											
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>																																														
4.5.2.1	Consumption of non-renewable energy shall be optimized and	The estate records the following 2019/20 data and tabulated the ratio against the FFB produced to determine the efficiency of their operations;	Complied																																											

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	<p>closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p><b>- Major compliance -</b></p>	<table border="1"> <thead> <tr> <th colspan="2"></th> <th colspan="4">Diesel L / FFB mt</th> </tr> <tr> <th colspan="2"></th> <th>2016</th> <th>2017</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>G Layang</td> <td>4.72</td> <td>5.61</td> <td>7.63</td> <td>6.71</td> </tr> <tr> <td>2</td> <td>G Tanjung</td> <td>3.37</td> <td>4.00</td> <td>4.15</td> <td>4.40</td> </tr> <tr> <td>3</td> <td>G L/worthy</td> <td>1.30</td> <td>1.36</td> <td>1.06</td> <td>1.32</td> </tr> </tbody> </table> <p>There has been initiative by the management in reducing the diesoline consumption through the following</p> <ul style="list-style-type: none"> <li>a) Manual grass cutting reducing the tractor running hours.</li> <li>b) Optimum running hours of tractors.</li> <li>c) Scheduled maintenance of tractors.</li> </ul>			Diesel L / FFB mt						2016	2017	2018	2019	1	G Layang	4.72	5.61	7.63	6.71	2	G Tanjung	3.37	4.00	4.15	4.40	3	G L/worthy	1.30	1.36	1.06	1.32	
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<b>4.5.2.2</b>	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p><b>- Major compliance -</b></p>	<p>The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets. Refer details as per indicator 4.5.2.1 above. Figures were extracted from the diesel issuance of estate diesel tank.</p>	Complied																														
<b>4.5.2.3</b>	<p>The use of renewable energy should be applied where possible.</p> <p><b>- Minor compliance -</b></p>	<p>There was no opportunity to use renewable energy (<i>shell/fibre/EFB</i>) in the estate with the present technology and facilities within the industry.</p>	Complied																														
<b>Criterion 4.5.3: Waste management and disposal</b>																																	
<b>4.5.3.1</b>	<p>All waste products and sources of pollution shall be identified and documented.</p>	<p>All waste and pollution are identified and documented in the Waste Management Action Plan. The compilation for 2020 was made at by the Sustainability Department applicable to both estates and mills.</p>	Complied																														

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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>- <b>Major compliance</b> -</p>	<p>The disposal/recycling of waste generated by the estates are made as follows;</p> <table border="1"> <thead> <tr> <th>Type of waste</th> <th>Location</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>Domestic waste rubbish</td> <td>Line sites, office, workshop, store,</td> <td>Collection/disposal 2x/week to the estate designated landfill.</td> </tr> <tr> <td>Industrial waste-fertilizer bags</td> <td>Empty bags store</td> <td>Inventory of bags, reuse for LF collection, sell to appointed contractor for surplus quantity.</td> </tr> <tr> <td>Scrap metal</td> <td>workshop</td> <td>Inventory maintained, tender at zone level for sale to licensed contractors</td> </tr> <tr> <td>SW 404 Clinical waste</td> <td>clinic</td> <td>Inventory maintained. Storage in sharp bin in clinic. Disposal to Sedafiat Sdn Bhd.</td> </tr> <tr> <td>SW rags, plastics, filters,</td> <td>Workshop</td> <td>Inventory maintained. Storage in scheduled waste store. Disposal to Lagenda Bumimas Sdn Bhd.</td> </tr> </tbody> </table>	Type of waste	Location	Action to be taken	Domestic waste rubbish	Line sites, office, workshop, store,	Collection/disposal 2x/week to the estate designated landfill.	Industrial waste-fertilizer bags	Empty bags store	Inventory of bags, reuse for LF collection, sell to appointed contractor for surplus quantity.	Scrap metal	workshop	Inventory maintained, tender at zone level for sale to licensed contractors	SW 404 Clinical waste	clinic	Inventory maintained. Storage in sharp bin in clinic. Disposal to Sedafiat Sdn Bhd.	SW rags, plastics, filters,	Workshop	Inventory maintained. Storage in scheduled waste store. Disposal to Lagenda Bumimas Sdn Bhd.	Complied						
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		Spent lubricant & hydraulic oil	Workshop	Inventory maintained. Storage in scheduled waste store. Disposal to Lagenda Bumimas Sdn Bhd	
		Disposed containers, bags, equipment contaminated with chemicals, pesticides,	Scheduled waste store	Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by G Planter authorized vendor by Jabatan Pertanian via letter dated 04/1/2014.	
<b>4.5.3.3</b>	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p><b>- Major compliance -</b></p>	<p>The procedures for handling used chemicals classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by Head Office personnel and implemented in all estates and mills for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows;</p> <ul style="list-style-type: none"> <li>a) Management of class 2 (and higher) chemical containers.</li> <li>b) Management of fertilizer bags</li> </ul> <p>These documents were established on 13/8/2009 (OSH Manual) and 01/8/2013 (Sustainability Manual) and remained effective for practice in all estates and mills. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The estates scheduled waste is disposed to Lagenda Bumimas Sdn Bhd. The estates compiled to the maximum 180 days retention days. All units in mt otherwise stated.</p>			Complied

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		Estate	Date	SW 305	SW 404	SW 102	SW 410	SW 408	
		GLE	31/12/19	0.405	-	0.204	0.200	0.021	
		GTE	15/7/20	0.800	-	-	0.120	0.080	
		GTE	22/6/20	-	0.018	-	-	-	
		GLW	15/7/20	0.800	-	-	0.056	0.010	
		GLW	09/7/20	-	0.012	-	-	-	
		Clinical waste is despatched to Sedafiat Sdn Bhd K Kinabalu.							
<b>4.5.3.4</b>	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer’s labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p><b>- Major compliance -</b></p>	<p>The guidelines and practice for handling empty pesticides containers are as established in the operational control procedure established as given in 4.5.3.3.</p> <ul style="list-style-type: none"> <li>a) All class 2 and above containers are tripled rinsed and holes punctured at the bottom only if the waste generator is to dispose as non-scheduled waste.</li> <li>b) Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process.</li> </ul> <p>These guidelines are based on Department Of Agriculture ref 91/120/038/014 dated 7/11/2002. During the site visit this has been adhered mainly containers are tripled rinsed and holes punctured at the container base. Empty containers were despatched to licensed buyer namely G Planter. Letter dated 04/1/2014 from Jabatan Pertanian refers. Records sighted as follows;</p>						Complied	

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<b>4.5.3.5</b>	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p><b>- Minor compliance -</b></p>	<p>The domestic waste was disposed as per <i>SOP Landfill and domestic waste management, SMP-GPB-12, Rev:01, Dated 1/12/2014</i>). The locations of the landfill areas are at the respective estates shown below. All locations were adequately distanced from watercourses and housing complex minimum of 50 meters.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Landfill site</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>G Layang</td> <td>P1999 Blk 25</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>2</td> <td>G Tanjung</td> <td>P2002 Blc 1</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>3</td> <td>G Lworthy</td> <td>P1996 Blc 38</td> <td>Collection 2/3 x week</td> </tr> </tbody> </table>					Estate	Landfill site	Remarks	1	G Layang	P1999 Blk 25	Collection 2/3 x week	2	G Tanjung	P2002 Blc 1	Collection 2/3 x week	3	G Lworthy	P1996 Blc 38	Collection 2/3 x week	Complied
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Criterion / Indicator		Assessment Findings	Compliance																								
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.</p> <p><b>- Major compliance -</b></p>	<p>The Environmental Improvement and Management plan was established at estates and reviewed annually. The following issues and mitigation program among others have been identified.</p> <table border="1"> <thead> <tr> <th></th> <th>Issues</th> <th>Mitigation program</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>surface water runoff</td> <td>construction of terraces,</td> </tr> <tr> <td>2</td> <td>Water quality</td> <td>avoid fertilizer application close to waterways clear marking for buffer one area,</td> </tr> <tr> <td>3</td> <td>chemical application</td> <td>planting of leguminous cover crop chemical reduction</td> </tr> <tr> <td>4</td> <td>air quality</td> <td>zero burning policy,</td> </tr> <tr> <td>5</td> <td>zero burning</td> <td>zero burning policy, landfill site &amp; recyclable waste</td> </tr> <tr> <td>6</td> <td>Fertilizer application</td> <td>fertilizer application close to waterways</td> </tr> <tr> <td>7</td> <td>Waste management.</td> <td>proper landfill site and recyclable waste</td> </tr> </tbody> </table> <p>The GHG emissions due to the operations is identified and recorded in the palm GHG version 3.01. These GHG calculations were made as per certification unit basics.</p>		Issues	Mitigation program	1	surface water runoff	construction of terraces,	2	Water quality	avoid fertilizer application close to waterways clear marking for buffer one area,	3	chemical application	planting of leguminous cover crop chemical reduction	4	air quality	zero burning policy,	5	zero burning	zero burning policy, landfill site & recyclable waste	6	Fertilizer application	fertilizer application close to waterways	7	Waste management.	proper landfill site and recyclable waste	Complied
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4.5.4.2	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p>	<p>The action plan has been elaborated in 4.5.4.1 above.</p>	Complied																								



Criterion / Indicator		Assessment Findings	Compliance
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<b>Criterion 4.5.5: Natural water resources</b>			
<b>4.5.5.1</b>	<p>The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> <li>a. Assessment of water usage and sources of supply.</li> <li>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities.</li> <li>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> <li>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</li> <li>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</li> <li>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</li> </ul>	<p>The Water Management Plan for the estates has been established. with latest review made on 1/1/2020. The plan emphasized on the following areas.</p> <ul style="list-style-type: none"> <li>a) Water source</li> <li>b) Efficient use of water</li> <li>c) Renewability of water source</li> <li>d) Avoidance of surface and ground water contamination</li> </ul> <p>Effort developed in order to maintain the quality and availability of natural water resources by practicing efficient water consumption through various methods such as</p> <ul style="list-style-type: none"> <li>a) implementation of rain water harvest, construction of water gate for effective management of collection/main drain,</li> <li>b) establishment of <i>mucuna bracteata</i> to prevent erosion, side drain at field road to control water, frond stacking,</li> <li>c) Enhancement of ground vegetation at bare ground area.</li> </ul> <p>All estates received supply of piped treated water from own source (self treatment) for the domestic consumption. There was rain harvest being practiced in the estates/mill. The general use of compound upkeep being initiated from the nearby water catchment. Water from triple rinsing of pesticide containers was reused for spraying. Records of rainfall data to</p>	Complied

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Criterion / Indicator		Assessment Findings		Compliance																															
	- Major compliance -	<p>assist in the water management plans were sighted from 2008. The estates adopted the following management plan in relation to water management. Details of the action plan and monitoring among others are tabled as follows;</p> <table border="1"> <thead> <tr> <th></th> <th>Areas of concerns</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water source</td> <td>Water from catchment pond</td> <td>Supply to residential areas /complex for all divisions Use in nursery and irrigation projects</td> </tr> <tr> <td rowspan="3">2</td> <td rowspan="3">Efficient use of water</td> <td>Residential areas</td> <td>Monitoring of pipes leakages</td> </tr> <tr> <td>Optimize usage &amp; reduce wastage</td> <td>Spraying pump maintenance</td> </tr> <tr> <td>Education/training</td> <td>Promote water conservation &amp; awareness among employees</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">Renewability water source</td> <td>Rain water capture at catchment</td> <td>Monitoring of pond level</td> </tr> <tr> <td>Rain water harvest</td> <td>Collection and usage at workshop</td> </tr> <tr> <td rowspan="4">4</td> <td rowspan="4">Avoidance of surface/ ground water contamination</td> <td>Sewage and septic tank</td> <td>To ensure no leakage of sewage/septic tank functioning properly/cover available</td> </tr> <tr> <td>Rubbish collection at line site</td> <td>Collection 2x/week Landfill located 400m from residential areas. Recycling practices</td> </tr> <tr> <td>Drainage system</td> <td>Free flow drains &amp; scheduled maintenance</td> </tr> <tr> <td>Water pollution</td> <td>Wash from chemical bays collected in sump for recycling Trap for oil constructed</td> </tr> </tbody> </table>			Areas of concerns	Action Plan	1	Water source	Water from catchment pond	Supply to residential areas /complex for all divisions Use in nursery and irrigation projects	2	Efficient use of water	Residential areas	Monitoring of pipes leakages	Optimize usage & reduce wastage	Spraying pump maintenance	Education/training	Promote water conservation & awareness among employees	3	Renewability water source	Rain water capture at catchment	Monitoring of pond level	Rain water harvest	Collection and usage at workshop	4	Avoidance of surface/ ground water contamination	Sewage and septic tank	To ensure no leakage of sewage/septic tank functioning properly/cover available	Rubbish collection at line site	Collection 2x/week Landfill located 400m from residential areas. Recycling practices	Drainage system	Free flow drains & scheduled maintenance	Water pollution	Wash from chemical bays collected in sump for recycling Trap for oil constructed	
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		<p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (<i>Management of River Reserve in Genting Plantations Bhd and DID guidelines in 2001</i>). The buffer zones established are as following:</p> <table border="1"> <thead> <tr> <th>1</th> <th>River width (Meters)</th> <th>Buffer Zone (Meters)</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>&gt;40</td> <td>50</td> </tr> <tr> <td>3</td> <td>20-40</td> <td>40</td> </tr> <tr> <td>4</td> <td>10-20</td> <td>20</td> </tr> <tr> <td>5</td> <td>5-10</td> <td>10</td> </tr> <tr> <td>6</td> <td>&lt;5</td> <td>5</td> </tr> </tbody> </table>		1	River width (Meters)	Buffer Zone (Meters)	2	>40	50	3	20-40	40	4	10-20	20	5	5-10	10	6	<5	5	
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	<p>All the estates in the CU continues to protect the water courses and wetlands including maintaining and restoring appropriate riparian buffer zones at or before replanting along all natural waterways within the estates. This was witnessed as follows. Genting Layang Estate had a corridor of life zone along the Sg Tenegang joint effort with WWF planted with forest trees beginning 2009.</p> <table border="1" data-bbox="1120 686 1727 818"> <thead> <tr> <th><i>No</i></th> <th><i>Estate</i></th> <th><i>Buffer zone area</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>G Layang</td> <td>Sg Tenegang P99 Block 19</td> </tr> <tr> <td>2</td> <td>G Tanjung</td> <td>Sg Tenegang P90 Block 01</td> </tr> <tr> <td>3</td> <td>G L/worthy</td> <td>Stream P 1996 Block 24</td> </tr> </tbody> </table> <p>Samples are taken from the mill and estates for detection of any pollution arising from the mill and estates activities. Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Extracted record of both the estates with details below;</p> <p>Among others management plan taken:</p> <ul style="list-style-type: none"> <li>a) Regular inspection at buffer/HCV areas</li> <li>b) Monitor water from surrounding areas</li> <li>c) Track, measure and report all activities around river</li> <li>d) Train and educate workers.</li> </ul>	<i>No</i>	<i>Estate</i>	<i>Buffer zone area</i>	1	G Layang	Sg Tenegang P99 Block 19	2	G Tanjung	Sg Tenegang P90 Block 01	3	G L/worthy	Stream P 1996 Block 24	
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	<p>Water sampling was taken quarterly to test against the industrial effluent water analysis and pesticide analysis. The sampling sites taken as follows;</p> <p>Among others parameters as shown below:</p> <table border="1" data-bbox="1111 699 1760 885"> <thead> <tr> <th></th> <th>Estate</th> <th>Point A</th> <th>Point B</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>G Tanjung</td> <td>Managed by GTPOM</td> <td>-</td> </tr> <tr> <td>2</td> <td>G Layang</td> <td>Sg Tenegang Besar</td> <td>Sg Layang</td> </tr> <tr> <td>3</td> <td>G L/worthy</td> <td>Nil</td> <td>Nil</td> </tr> </tbody> </table> <table border="1" data-bbox="1050 887 1904 1254"> <thead> <tr> <th colspan="6">Drinking water</th> </tr> <tr> <th></th> <th>parameter</th> <th>Standard</th> <th></th> <th>Parameter</th> <th>standard</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>6-9</td> <td>6</td> <td>SS</td> <td>NL</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>3</td> <td>7</td> <td>AN</td> <td>1.5</td> </tr> <tr> <td>3</td> <td>COD</td> <td>NL</td> <td>8</td> <td>DO</td> <td>5-7</td> </tr> <tr> <td>4</td> <td>Chloride</td> <td>250</td> <td>9</td> <td>Oil /Grease</td> <td>NL</td> </tr> <tr> <td>5</td> <td>Coliform</td> <td>ND</td> <td>10</td> <td>E-coli</td> <td>ND</td> </tr> </tbody> <thead> <tr> <th colspan="6">River water</th> </tr> <tr> <th></th> <th>parameter</th> <th>Standard</th> <th></th> <th>Parameter</th> <th>standard</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>5-6</td> <td>4</td> <td>S Solids</td> <td>50-150</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>3-6</td> <td>5</td> <td>A nitrogen</td> <td>0.3-0.9</td> </tr> <tr> <td>3</td> <td>COD</td> <td>23-30</td> <td>6</td> <td>Phosporus</td> <td>-</td> </tr> </tbody> </table> <p>The management concludes that the water quality is acceptable and does not create major impact to the water system.</p>		Estate	Point A	Point B	1	G Tanjung	Managed by GTPOM	-	2	G Layang	Sg Tenegang Besar	Sg Layang	3	G L/worthy	Nil	Nil	Drinking water							parameter	Standard		Parameter	standard	1	pH	6-9	6	SS	NL	2	BOD	3	7	AN	1.5	3	COD	NL	8	DO	5-7	4	Chloride	250	9	Oil /Grease	NL	5	Coliform	ND	10	E-coli	ND	River water							parameter	Standard		Parameter	standard	1	PH	5-6	4	S Solids	50-150	2	BOD	3-6	5	A nitrogen	0.3-0.9	3	COD	23-30	6	Phosporus	-	
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Criterion / Indicator		Assessment Findings	Compliance
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. <b>- Minor compliance -</b>	This is in compliance by the estates. This requirement is also audited internally by the Sustainability Department personnel. During the field visit no construction of such was observed.	Complied
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). <b>- Minor compliance -</b>	During the site visit practices of water harvesting are noted mainly constructed on flat areas in both estates. There were construction of WCP = Water Conservation Pit ratio of 1 ha to 34 points. Road side pits were also available at every 3 palm rows, to divert in event of water overflowing and also to benefit the nearest palm at the pit end to obtain additional moisture. This is part of the common practices introduced within the Group Agriculture Procedures.	Complied
<b>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</b>			
4.5.6.1	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover: a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. <b>- Major compliance -</b>	There was an assessment made namely "Inventory on HCV sites within <i>Genting Plantation Bhd Group Estates (Sabah Region 1)</i> conducted by <i>M/S S.K. Yap Forestry and Landscape Advisory Services on Oct 2009 – July 2010</i> . The HCV assessment for the entire region covers the estates and mills in Sabah. Methodology is through site observation, interviews, stakeholders consultation and desktop review on available secondary data. The assessment among others covers the following areas; a) Overview of HCV assessment. b) Description of assessment areas. c) Finding and discussion - landscape context - HCV criteria and application to agriculture d) HCV monitoring and management	Complied

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		<p>Based on the findings of the assessment, the management and monitoring plan for HCV areas report dated 10th October 2014; High Conservation Value (HCV) areas have been identified such as forested area, river buffer zone, steep terrain, wildlife sanctuary in Genting Tenegang Group Estate. The following aspects areas were assessed as to their state and management.</p> <ul style="list-style-type: none"> <li>a) Area of HCV-Shared management of forest reserve and boundary areas/buffer zones</li> <li>b) The presence of large mammals and birds and how they are protected from poaches.</li> <li>c) IPM: use of plants to attract <i>parasitoids</i> to control bagworms &amp; barn owls for rats management and success</li> <li>d) Drainage and the conditions. Determining the presence of fishes as a bio-indicator of water health</li> </ul> <p>The report summarized the following;</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Estate</th> <th>HCV 1</th> <th>HCV 2</th> <th>HCV 3</th> <th>HCV 4</th> </tr> </thead> <tbody> <tr> <td>G Layang</td> <td>1.1 / 1.2 / 1.4</td> <td>-</td> <td>3.0</td> <td>4.2</td> </tr> <tr> <td>G L/worthy</td> <td>1.1</td> <td>-</td> <td>-</td> <td>4.2</td> </tr> <tr> <td>G Tanjung</td> <td>1.1 / 1.4</td> <td>-</td> <td>-</td> <td>4.1 / 4.2</td> </tr> </tbody> </table> <p>There were also presence of rivers and burial grounds (Muslim &amp; Christian) for local communities within the estate.</p>	Estate	HCV 1	HCV 2	HCV 3	HCV 4	G Layang	1.1 / 1.2 / 1.4	-	3.0	4.2	G L/worthy	1.1	-	-	4.2	G Tanjung	1.1 / 1.4	-	-	4.1 / 4.2	
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G Tanjung	1.1 / 1.4	-	-	4.1 / 4.2																			
<b>4.5.6.2</b>	If rare, threatened or endangered species or high biodiversity value, are present, appropriate measures for management	There is no RTE or high biodiversity value at GT complexes except for reported observation of estuarine crocodiles found at <i>Sg Labuk River</i> . The	Complied																				

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Criterion / Indicator	Assessment Findings	Compliance																														
<p>planning and operations should include:</p> <p>d) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>e) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p><b>- Major compliance -</b></p>	<p>management and monitoring plan for HCV areas was established and reviewed annually. There were displays of signage made at site i.e.</p> <ul style="list-style-type: none"> <li>a) No fishing, no manuring,</li> <li>b) no spraying, no slashing, no swimming</li> <li>c) Muslim &amp; Christian cemetery signage).</li> </ul> <p>There were programs held by the estates to all employees in pertaining to the awareness of HCV areas and RTE species. Interview with the employees concluded that training and briefing made during the ad-hoc session and morning muster. This is also emphasized during the training held by the Sustainability Unit programs. Employees are aware of the following reminders;</p> <ul style="list-style-type: none"> <li>a) An offence to capture, harm, kills any wildlife.</li> <li>b) Disciplinary measures shall be taken if found violating company rules.</li> <li>c) Riparian buffer zone to be free from any chemicals application/pollution</li> <li>d) Relevant signs <i>NO HUNTING NO FELLING ALLOWED</i></li> </ul> <p>Training in relation to the HCV management is shown below;</p> <table border="1" data-bbox="1050 1158 1868 1342"> <thead> <tr> <th></th> <th>Subject</th> <th>GT</th> <th>GL</th> <th>GLW</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Company Policies Briefing</td> <td>24/2/20</td> <td>17/10/19</td> <td>01/7/20</td> </tr> <tr> <td>2</td> <td>MSPO Briefing to Contractors</td> <td>10/1/20</td> <td>29/8/20</td> <td>21/6/19</td> </tr> <tr> <td>3</td> <td>Riparian Zone Protection</td> <td>10/9/19</td> <td>10/9/19</td> <td>17/8/19</td> </tr> <tr> <td>4</td> <td>Protection of HCV riparian zone</td> <td>10/3/20</td> <td>-</td> <td>10/3/20</td> </tr> <tr> <td>5</td> <td>Riparian Zone protection</td> <td>-</td> <td>23/8/19</td> <td>-</td> </tr> </tbody> </table>		Subject	GT	GL	GLW	1	Company Policies Briefing	24/2/20	17/10/19	01/7/20	2	MSPO Briefing to Contractors	10/1/20	29/8/20	21/6/19	3	Riparian Zone Protection	10/9/19	10/9/19	17/8/19	4	Protection of HCV riparian zone	10/3/20	-	10/3/20	5	Riparian Zone protection	-	23/8/19	-	
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Criterion / Indicator		Assessment Findings	Compliance												
<p><b>4.5.6.3</b></p> <p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p><b>- Major compliance -</b></p>	<p>The RTE assessment was incorporated in the HCV report and evaluation. Therein providing wildlife database categories of;</p> <ul style="list-style-type: none"> <li>a) Birds / Mammals</li> <li>b) <i>Herpetofauna</i> / Conservation status</li> <li>c) Offence and penalties under Wildlife Conservation Act 2010.</li> <li>d) Provocation of wildlife.</li> </ul> <p>In records there is no RTE species observed/spotted within the member estates in CU. Relevant action plans had been established and implemented concerning protection of the riparian, such as identification on map and ground, restriction of no chemicals activities, awareness training to workers and patrolling by Auxiliary Police. The estates reviewed the HCV management plan annually in -Jan 2020.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>HCV area</th> <th>Management &amp; Monitoring</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Protected areas</td> <td>Boundary markers estate/forest reserve Signage on no illegal hunting/collecting &amp; no authorised entry Patrol the boundary area</td> </tr> <tr> <td style="text-align: center;">2</td> <td>RTE</td> <td>Inform all stakeholders on HCV assessment and protection Education &amp; awareness for workers Ensure no agrochemicals activities at bordering water bodies</td> </tr> <tr> <td style="text-align: center;">3</td> <td>Sacred sites</td> <td>Clear demarcation and proper fencing at identified HCV Inform community concerning utilisation of site To maintain cleanliness / upkeep of areas Maintain a buffer in order to secure the ares from fire and other disturbances</td> </tr> </tbody> </table>			HCV area	Management & Monitoring	1	Protected areas	Boundary markers estate/forest reserve Signage on no illegal hunting/collecting & no authorised entry Patrol the boundary area	2	RTE	Inform all stakeholders on HCV assessment and protection Education & awareness for workers Ensure no agrochemicals activities at bordering water bodies	3	Sacred sites	Clear demarcation and proper fencing at identified HCV Inform community concerning utilisation of site To maintain cleanliness / upkeep of areas Maintain a buffer in order to secure the ares from fire and other disturbances	<p>Complied</p>
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				To include areas in HCV map	
		4	Ecosystem	Place clear boundary markers between estate and forest reserve. Place signage on no illegal activities Patrol boundary areas within forest reserve regularly Socialise the HCV assessment consisting of identification management and monitoring to all employees Information to stakeholders on the HCV	
<b>Criterion 4.5.7: Zero burning practices</b>					
<b>4.5.7.1</b>	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.  <b>- Major compliance -</b>	<p>There was no land preparation in the Estates CU by burning ever since Genting Plantations practice zero burning as per the policy in the Zero Burning Policy dated 10/8/11 signed by the President &amp; Chief Operating Officer. Therein stating</p> <ul style="list-style-type: none"> <li>a) No open burning of any kind in all OU</li> <li>b) All types of waste products disposed appropriately</li> <li>c) Limited open burning allowed for cooking and religious purposes under appropriate supervision.</li> </ul> <p>In the 2019/20 replants visited during the audit in CU it was evident that all palms were felled, shredded, windrowed and left to decompose.</p>			Complied

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4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. <b>- Major compliance -</b>	N/A. Details in 4.5.7.1 above	Complied
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. <b>- Major compliance -</b>	N/A. Details in 4.5.7.1 above	Complied
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. <b>- Minor compliance -</b>	This is included in the specification of work orders in event of land preparation during a replanting. It is a standard practice in Genting Group and within the Industry. However there are variations of practices between inland and coastal estates. Trunks are felled and chipped without having to shred and windrowed in certain conditions.  Adjustment of work if any are finalized from the directive of the Regional Office/Head Office.	Complied
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Site Management</b>			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. <b>- Major compliance -</b>	The estates operations are guided by the following manuals. a) Genting Plantations Oil Palm Manual OPM issued on 9/11/99 updated June 2013.	Complied

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	<ul style="list-style-type: none"> <li>- Land preparation/nursery/planting/soil conservation/</li> <li>- Pest &amp; Disease/weeding/fertiliser application/harvesting</li> <li>- Managing difficult soils/crop forecast</li> </ul> <p>b) Sustainability Management Procedure Manual 1/8/13 revised in 7/2/19.</p> <p>c) OSH Manual dated 1/1/2010.</p> <p>d) Environmental Control Procedure – 01/9/2018</p> <p>e) Store Operating Manual – 2014</p> <p>f) Standard Operating Procedure Malaysia Estates rev 2 (Dec 10) rev 3 (Oct 13)</p> <p>g) Jobs description - 2012</p> <p>The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections</p> <ul style="list-style-type: none"> <li>a) OPM No 7. Manuring of oil palm</li> <li>b) OPM no 13. Managing difficult soils</li> </ul> <p>The procedures as documented in the manuals and SOPs were disseminated to the staff/workers through morning briefings and training. The manuals are kept in the main office for references of employees particularly for the supervisory personnel. Field inspection and interviews</p>	

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		with the workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs. The SOPs included the operation activities from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt.																									
<b>4.6.1.2</b>	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.  <b>- Major compliance -</b>	The estates construct terraces at slope area of more than 6 degree. Planting of cover crop are made to retain the soil structure and conservation. Road side pit are made to divert water at slope areas to prevent road erosion and surface damage. Terraces are constructed inclined towards the terrace wall	Complied																								
<b>4.6.1.3</b>	A visual identification or reference system shall be established for each field.  <b>- Major compliance -</b>	All fields are marked and identified. Information i.e. block number, year of planting (field no), type of clone and the total hectare is shown in all markers. There are both stenciled at the palm trees and also displayed in signage at the boundary/corners of every field. This is observed during the field visit. Block numbers were also identified in series <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th colspan="5">Locations of field markers visited</th> </tr> </thead> <tbody> <tr> <td>G Layang</td> <td>P99</td> <td>P00</td> <td>P95</td> <td>-</td> <td>-</td> </tr> <tr> <td>G Tanjung</td> <td>P90</td> <td>P19</td> <td>P02</td> <td>-</td> <td>-</td> </tr> <tr> <td>G L/worthy</td> <td>P96</td> <td>P94</td> <td>P99</td> <td>P98</td> <td>-</td> </tr> </tbody> </table>		Locations of field markers visited					G Layang	P99	P00	P95	-	-	G Tanjung	P90	P19	P02	-	-	G L/worthy	P96	P94	P99	P98	-	Complied
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<b>Criterion 4.6.2: Economic and financial viability plan</b>																											

Criterion / Indicator	Assessment Findings	Compliance
<p><b>4.6.2.1</b> A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p><b>- Major compliance -</b></p>	<p>The estate audited possessed a similar budget format to the mill. Inclusive there is also a 5-year budget/forecast financial plan 2020-2024 allocating categories among others;</p> <ul style="list-style-type: none"> <li>a) Hectarage statement and crop production</li> <li>b) Total planted area mature &amp; immature</li> <li>c) Crop yielding area</li> <li>d) Mature cost               <ul style="list-style-type: none"> <li>- Weeding/drainage/pest/</li> <li>- Supplying/roads/bridges/paths/road/</li> <li>- Terracing/pruning/sanitation</li> </ul> </li> <li>e) Manuring/harvesting &amp; Collection/Weeding</li> <li>f) Transportation /depreciation/General Charges</li> <li>g) Cost/ha &amp; cost /mt FFB</li> <li>h) CAPEX</li> </ul> <p>Separately the cost of immature areas is also shown which among others comprises of the following items;</p> <ul style="list-style-type: none"> <li>a) Labour statement / Allocation of wages / Labour benefit summary</li> <li>b) Yield statement oil palm</li> <li>c) Summary of vehicle and running schedule / Job allocation for vehicles</li> <li>d) Summary of workshop running schedule</li> <li>e) Summary of budget</li> <li>f) Summary of general charges</li> <li>g) CAPEX</li> </ul> <p>The five years planning horizon 2020-2024 is available.</p>	<p>Complied</p>

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<b>4.6.2.2</b>	<p>Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years.</p> <p><b>- Major compliance -</b></p>	<p>The replanting programs for the estate are compiled as follows. The programs are reviewed on an annual basis which is subject to amendment. All figures in hectares otherwise stated.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>No</th> <th>Year</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>GLE</td> <td>0.00</td> <td>69.68</td> <td>172.59</td> <td>174.38</td> <td>155.79</td> </tr> <tr> <td>2</td> <td>GTE</td> <td>600.00</td> <td>481.05</td> <td>419.55</td> <td>529.07</td> <td>0.00</td> </tr> <tr> <td>3</td> <td>GLW</td> <td>433.44</td> <td>442.27</td> <td>441.99</td> <td>741.29</td> <td>737.91</td> </tr> </tbody> </table> <p>Sizes of fields identified for replanting varies subject to factors i.e hilly, yield etc. All replanting program and planning in all the Group Estates are monitored by the Head Office. Assistance and visits are performed by GM for the approval of hectares, stand per ha etc.</p>	No	Year	2020	2021	2022	2023	2024	1	GLE	0.00	69.68	172.59	174.38	155.79	2	GTE	600.00	481.05	419.55	529.07	0.00	3	GLW	433.44	442.27	441.99	741.29	737.91	Complied
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<b>4.6.2.3</b>	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> <li>a) Attention to quality of planting materials and FFB</li> <li>b) Crop projection: site yield potential, age profile, FFB yield trends</li> <li>c) Cost of production: cost per tonne of FFB</li> <li>d) Price forecast</li> <li>e) Financial indicators: cost benefit, discounted cash flow, return on investment</li> </ul> <p><b>- Major compliance -</b></p>	<p>This requirement i.e. crop material, crop projection, yield, production cost are available. It is provided in the business management plan shown in item 4.6.2.1 above. The financial indicators: cost benefits, discounted cash flow, return on investment details are managed and kept in confidentiality at the Head Office level. The estates managed the financial elements through guidance of the approved budget. Deviations are sought to the higher superior level for any additional vote and projects if necessary.</p>	Complied																												
<b>4.6.2.4</b>	<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>The estates performance is recorded in the monthly progress report. Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein.</p> <ul style="list-style-type: none"> <li>a) The management also provides variance report on the</li> </ul>	Complied																												

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	- <b>Major compliance</b> -	<p>performance and reviewed on a monthly basis.</p> <p>b) The supervisory personnel maintained a daily cost for the field operations.</p> <p>The Regional meeting involving the Managers sits monthly with the Head Office, higher management for the performance review.</p>	
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p>- <b>Major compliance</b> -</p>	<p>Pricing mechanism for product and services was normally done through opened tender or comparison of quotations. So far there has been no complaint lodge by suppliers or service providers with regards to the pricing mechanism.</p>	Complied
<b>4.6.3.2</b>	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- <b>Major compliance</b> -</p>	<p>GLWE</p> <p>Verification of payment advice for transporting FFB in May 2020 #519851440100002 and #519839950100003 showed that the payments were made in timely manner, i.e. 16&amp;17/6/2020 (agreed timing is within 30 days from the date the transportation work is carried out) and amount is in accordance to the contract agreements.</p>	Complied
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	<p>Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- <b>Major compliance</b> -</p>	<p>Awareness and understanding about the MSPO requirements were given to the contractors through stakeholder meetings. Minutes of meeting were available decumbently Based on interviews, contractors were able to demonstrate a good understanding of the MSPO requirements.</p>	Non-conformity



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4.6.4.2	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p><b>- Major compliance -</b></p>	<p>Contract agreements between the estates and the contractors were available for verification. All the agreements are valid until 31/12/2020. Among the contractors verified were</p> <p>GLWE</p> <ul style="list-style-type: none"> <li>- Man Fook Hing Transpot Plt</li> <li>- Adnan Khair Enterprise</li> <li>- Chong Nyuk Fah Sdn Bhd</li> </ul> <p>GTJE</p> <ul style="list-style-type: none"> <li>- Puncak Jaya</li> <li>- Syarikat Perusahaan Kan</li> <li>- Pemborong Anak Balung</li> </ul>	Complied
4.6.4.3	<p>The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.</p> <p><b>- Minor compliance -</b></p>	<p>Genting Tanjung certification unit has no objection to allow BSI auditors to verify the assessment through physical inspection if required.</p>	Complied
4.6.4.4	<p>The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted.</p> <p><b>- Major compliance -</b></p>	<p>Delivery of task is verified by the estates before proceeding for payment. Evaluation of task was normally done through utilisation of the company's "Schedule of Work Completed" (SOWC) – General Work Order. Verification of the forms showed that checking of tasks were done and acknowledged by the contractors.</p>	Complied
<b>4.7 Principle 7: Development of new planting</b>			

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.7.1:</b> High biodiversity value			
<b>4.7.1.1</b>	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation.  - Major compliance -	NA as no new planting at the sampled estates.	Complied
<b>4.7.1.2</b>	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required.  - Major compliance -	NA as no new planting at the sampled estates.	Complied
<b>Criterion 4.7.2:</b> Peat Land			
<b>4.7.2.1</b>	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice.  - Major compliance -	NA as no new planting at the sampled estates.	Complied
<b>Criterion 4.7.3:</b> Social and Environmental Impact Assessment (SEIA)			

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Criterion / Indicator		Assessment Findings	Compliance
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. <b>- Major compliance -</b>	NA as no new planting at the sampled estates.	Complied
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. <b>- Major compliance -</b>	NA as no new planting at the sampled estates.	Complied
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. <b>- Major compliance -</b>	NA as no new planting at the sampled estates.	Complied
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. <b>- Minor compliance -</b>	NA as no new planting at the sampled estates.	Complied
<b>Criterion 4.7.4: Soil and topographic information</b>			
4.7.4.1	Information on soil types shall be adequate to establish	NA as no new planting at the sampled estates.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	the long-term suitability of the land for oil palm cultivation. <b>- Major compliance -</b>		
<b>4.7.4.2</b>	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. <b>- Major compliance -</b>	NA as no new planting at the sampled estates.	Complied
<b>Criterion 4.7.5:</b> Planting on steep terrain, marginal and fragile soils			
<b>4.7.5.1</b>	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. <b>- Major compliance -</b>	NA as no new planting at the sampled estates.	Complied
<b>4.7.5.2</b>	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. <b>- Major compliance -</b>	NA as no new planting at the sampled estates.	Complied
<b>4.7.5.3</b>	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. <b>- Major compliance -</b>	NA as no new planting at the sampled estates.	Complied
<b>Criterion 4.7.6:</b> Customary land			

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Criterion / Indicator		Assessment Findings	Compliance
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. <b>- Major compliance -</b>	NA as no new planting at the sampled estates.	Complied
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. <b>- Minor compliance -</b>	NA as no new planting at the sampled estates.	Complied
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. <b>- Major compliance -</b>	NA as no new planting at the sampled estates.	Complied
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. <b>- Major compliance -</b>	NA as no new planting at the sampled estates.	Complied
4.7.6.5	Identification and assessment of legal and recognised	NA as no new planting at the sampled estates.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	customary rights shall be documented. <b>- Major compliance -</b>		
<b>4.7.6.6</b>	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. <b>- Major compliance -</b>	NA as no new planting at the sampled estates.	Complied
<b>4.7.6.7</b>	The process and outcome of any compensation claims shall be documented and made publicly available. <b>- Major compliance -</b>	NA as no new planting at the sampled estates.	Complied
<b>4.7.6.8</b>	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. <b>- Minor compliance -</b>	NA as no new planting at the sampled estates.	Complied

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

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	Policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	Genting Plantations Berhad has established an MSPO Policy dated 18/3/2014 signed by the President & Chief Operating Officer. The Policy among others emphasized the following;  a) Committed to to the 3 pillars of sustainable development namely people, planet and profit.  b) To establish and maintain an effective sustainability management system throughout the organization.  c) To ensure compliance with MSPO and the MPOB code of practice requirements.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. <b>- Major compliance -</b>	The organization shall endeavor to;  a) to implement good manufacturing processed and effective practices measures to avoid or mitigate any adverse impact to the environment and ecosystem within and around its operations.  b) Reduce all relevant significant emissions from biomass production, conversion process and transportation	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			

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Criterion / Indicator		Assessment Findings	Compliance
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. <b>- Major compliance -</b>	The recent internal audit Audit 26/6/20 - 1 NCR on 4.4 incinerator stairs. In addition there were also proposed 9 OFI in relation to documentation improvement. The audit prior was on 24/10/19. Mainly audit will be made in preparation to the external audits i.e RSPO/MSPO	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. <b>- Major compliance -</b>	There is an SOP - dated 25/8/18 of 7 pages in sustainable management procedure manual SMP-GPB-03 dated 11/12/2013. Therein describing procedure to conduct internal audits, role of auditors, closure of NCR etc. Records were maintained for a period of 10 years. relation to the internal matters. Schedule provided via email dated 23/6/20 revision. To all estates and mill in Genting Tanjung.	Complied
4.1.2.3	Reports shall be made available to the management for their review. <b>- Major compliance -</b>	Reports are made available to the respective Head Of Department. The audit report dated 26/6/2020 was sighted and verified. Audit plan was provided via email dated 23/6/20 revision to all the estates and mill in Genting Tanjung complex.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
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. <b>- Major compliance -</b>	A management review was held on 02/7/20 consolidating all estates and mill within the complex attended by 16 participants. The agenda discussed among others; <ul style="list-style-type: none"> <li>i) Changes, improvement and modification of sustainability management system</li> <li>j) Complaint and grievance</li> <li>k) Stakeholders issue</li> </ul>	Complied



Criterion / Indicator		Assessment Findings	Compliance															
		l) Continual improvement m) Training n) Legal and other requirement o) Internal and external audit findings p) Customer feedback  Previous meeting was dated on 31/10/2019																
<b>Criterion 4.1.4 – Continual Improvement</b>																		
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.  <b>- Major compliance -</b>	The CU has established the action plan for continual improvement among others as described below. The compilation is based on the social and environment impact. Projects incurring expenditures are provided in the CAPEX budget spanned over 3 years planning. <table border="1" style="margin-top: 10px;"> <thead> <tr> <th></th> <th>Objective</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>To improve environmental aspects and impacts risk control</td> <td>Regular water quality monitoring/action</td> </tr> <tr> <td></td> <td></td> <td>Biogas Plant installation in discussion by the management</td> </tr> <tr> <td>2</td> <td>Waste reduction to max recycling &amp; min waste generation</td> <td>Awareness among employees Campaign / programs</td> </tr> <tr> <td>3</td> <td>Social impacts to improve living conditions of workers</td> <td>Schedule painting of quarters</td> </tr> </tbody> </table>		Objective	Action Plan	1	To improve environmental aspects and impacts risk control	Regular water quality monitoring/action			Biogas Plant installation in discussion by the management	2	Waste reduction to max recycling & min waste generation	Awareness among employees Campaign / programs	3	Social impacts to improve living conditions of workers	Schedule painting of quarters	Complied
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Criterion / Indicator		Assessment Findings			Compliance
				Improvement of drainage structure	
		4	Dust particulate emission	Installation of ESP (in progress). target for commissioning in Dec 2020.	
		5	Reduction of effluent solid	Operation using bio-polishing plant	
<b>4.1.4.2</b>	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.  - <b>Major compliance</b> -	This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the GM and higher Head Of Department are transacted during the monthly Managers meetings and emails. Provision of machine and other major requirement are made in CAPEX budget.			Complied
<b>4.2 Principle 2: Transparency</b>					
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements					
<b>4.2.1.1</b>	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.  - <b>Major compliance</b> -	Genting Tanjung Palm Oil Mill and its supply bases are transparent and open to communicate its information on environmental, social and legal issues relevant to sustainability practice to the public, e.g. <ul style="list-style-type: none"> <li>• Company annual report</li> <li>• Group policies</li> <li>• Reports related to environment i.e. EAI (Environmental Aspect Impact Assessment), EIA (environmental Impact Assessment etc.</li> <li>• MSPO/RSPO external audit reports</li> </ul>			Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>• Pollution prevention plan</li> <li>• Continuous improvement plan</li> <li>• Complaints and grievances book and its procedure</li> <li>• Negotiation and compensation procedure</li> <li>• Sexual harassment procedure</li> <li>• Estate/mill maps and land titles</li> <li>• Any reports or information related to HCV area</li> <li>• Any reports or information related to social i.e. SIA</li> <li>• RSPO internal audit report</li> </ul> <p>This is addressed in its Sustainability Management Procedure Manual, Procedures on Request and Responses [SMP-GPB-25, rev. 00, 14/8/2014]. Means of communication is spelt out in clause 3.1.1 of the procedure e.g. meetings, telephone, walk in to office, letter, e-mail, fax, etc.</p>	
<b>4.2.1.2</b>	<p>The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p><b>- Major compliance -</b></p>	<p>The management documents which are publicly available are mentioned in Indicator 4.2.1.1. Any request of information shall be recorded in "Enquiry Register Book" (ref.: Clause 3.1.2 of the above procedure). Verification of the book showed that there has been no request made of the above-mentioned subjects ever since the last assessment.</p>	Complied
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p><b>- Major compliance -</b></p>	<p>Procedure is available entitled Sustainability Management Procedure Manual, Consultation and Communication [SMP-GPB-17, rev. 02, 23/2/2018].</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - <b>Minor compliance</b> -	All issues and grievances are handled by the Manager of each operating unit. If the issue happened be beyond the manager jurisdiction, it shall be forwarded to the Head Office.	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - <b>Major compliance</b> -	The list of stakeholders was last updated in June 2020 which consists of government agency, suppliers/contractors, FFB suppliers and surrounding communities. There have been two meetings with the stakeholders i.e. on 30/10/2019 (external stakeholders – government agencies), 21/10/2019 (external stakeholders – contractors & suppliers). Apart from that each estate and mill had also organised their own internal stakeholders’ meetings. Minutes of meetings were available for verification. Generally, among the agenda discussed were company’s policies, legal compliance issues, FFB pricing mechanism, harvesting standard, safety and environmental issues, sustainability standard requirements (e.g. RSPO P&C, MSPO, ISCC) and handling of complaints/grievances mechanism.	Complied
<b>Criterion 4.2.3 – Traceability</b>			
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. - <b>Major compliance</b> -	The traceability implementation is addressed in a procedure, SMPM, Supply Chain and Traceability (Mill) [SMP-GPB-23, rev. 7, 24/8/2018].	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system.	Inspection on compliance with the traceability procedure is regularly checked through supply chain internal audit. The internal audit report,	Complied

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	- <b>Major compliance</b> -	which was carried out together with other schemes such as RSPO and ISCC, was available for verification.																
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - <b>Minor compliance</b> -	The Mill Manager is the person assigned to implement and maintain the traceability system.	Complied															
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - <b>Major compliance</b> -	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel are maintained in various forms such as: <ul style="list-style-type: none"> <li>• Mass Balance Worksheet – monthly input</li> <li>• Local Sales Delivery Advice (LSDA)</li> <li>• Incoming FFB Records</li> <li>• Outgoing CPO Records</li> <li>• Outgoing PK Records</li> </ul>	Complied															
<b>4.3 Principle 3: Compliance to legal requirements</b>																		
<b>Criterion 4.3.1 – Regulatory requirements</b>																		
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - <b>Major compliance</b> -	Genting Tanjung 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 SD sustainability team. The licenses and permits governed by the Local, State and Federal authorities among others as shown below; <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>License / Permits</th> <th>Validity /Ref no</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>DOE no 001878</td> <td>003584</td> </tr> <tr> <td>2</td> <td>MPOB license no 50013770-4000</td> <td>30/11/20</td> </tr> <tr> <td>3</td> <td>Diesel permit S002458</td> <td>23/6/21</td> </tr> <tr> <td>4</td> <td>Water Tube Boiler PMD 10315</td> <td>15/11/20</td> </tr> </tbody> </table>		License / Permits	Validity /Ref no	1	DOE no 001878	003584	2	MPOB license no 50013770-4000	30/11/20	3	Diesel permit S002458	23/6/21	4	Water Tube Boiler PMD 10315	15/11/20	Complied
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Criterion / Indicator		Assessment Findings		Compliance																					
		5	Water Tube Boiler PMD 2457	03/5/21																					
		6	Sterilizer no 1 PMT 1928447	30/1/21																					
		7	Sterilizer no 2 PMT 1928448	30/1/21																					
		8	Sterilizer no 3 PMT 1928063	06/1/21																					
		9	JTK license 0379 FW recruitment	13/5/21																					
		10	Air Compressor PMT28067	06/1/21																					
		11	Air receiver PMT 12997	06/1/21																					
		12	Fire certificate SB/7/207	30/9/20																					
		13	Metrology Corporation B1599041	10/2/21																					
		<p><i>Factory and Machinery Act 1967 –</i></p> <p>The following competency requirements were verified:</p> <table border="1"> <thead> <tr> <th></th> <th>Competent person</th> <th>No of personnel</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Steam engineer</td> <td>2<sup>nd</sup> grade - 2</td> </tr> <tr> <td>2</td> <td>Engine Driver (BHC)</td> <td>1-2<sup>nd</sup> grade</td> </tr> <tr> <td>3</td> <td>Boiler men</td> <td>One 1<sup>st</sup> grade</td> </tr> <tr> <td>4</td> <td>AESP Authorised Entrant &amp; Standby Person -Confined Space</td> <td>2 competent persons</td> </tr> <tr> <td>5</td> <td>AGT Authorised Gas Tester &amp; Entry Supervisor Confined Space</td> <td>1 competent person</td> </tr> <tr> <td>6</td> <td>ICE driver</td> <td>One 1<sup>st</sup> grade</td> </tr> </tbody> </table>				Competent person	No of personnel	1	Steam engineer	2 <sup>nd</sup> grade - 2	2	Engine Driver (BHC)	1-2 <sup>nd</sup> grade	3	Boiler men	One 1 <sup>st</sup> grade	4	AESP Authorised Entrant & Standby Person -Confined Space	2 competent persons	5	AGT Authorised Gas Tester & Entry Supervisor Confined Space	1 competent person	6	ICE driver	One 1 <sup>st</sup> grade
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Criterion / Indicator		Assessment Findings		Compliance													
		7	Electrical Chargemen	One AO Chargemen													
		<p><i>EQ (Prescribed Premise) Crude Palm Oil Regulations 1977</i></p> <ul style="list-style-type: none"> <li>a) Requirement in "Jadual Pematuhan"</li> <li>b) Discharge method – zero discharge – water course</li> <li>c) Scheduled waste (CePSWaM): Mr Tan Yee Ming and Mr Ronlie Roney SD Executive</li> <li>d) Effluent Pond (CePPOME): Mr Tan Yee Ming ) siri no: CePPOME/192723</li> <li>e) <i>Air Monitoring</i> <ul style="list-style-type: none"> <li>a) Black smoke – The smoke density indicator alarm for boiler no.2 was functioning during site review at GTPOM.</li> <li>b) Particulate – Stack sampling was carried out on quarterly basis for both boilers.</li> <li>c) Noted that monitoring was conducted on (at 12.0%) CO2.</li> </ul> </li> </ul> <table border="1"> <thead> <tr> <th>Boiler no</th> <th>Date</th> <th>Dust concentration</th> <th>EQA std</th> </tr> </thead> <tbody> <tr> <td>PMD2457</td> <td>11/12/19</td> <td>202.5mg/m3</td> <td>150 mg/m3</td> </tr> <tr> <td>PMD10315</td> <td>02/1/20</td> <td>150.0 mg/m3</td> <td>150 mg/m3</td> </tr> </tbody> </table> <p>The stack sampling was carried out by Multi Serve Enterprise. The mill has taken action in installing ESP (in progress) target for commissioning on Dec 2020.</p> <p>FFB allowable max processed by the mill in 2019 under MPOB licence no 50013770-4000 is 408000mt. The total actual processed from Jan-</p>			Boiler no	Date	Dust concentration	EQA std	PMD2457	11/12/19	202.5mg/m3	150 mg/m3	PMD10315	02/1/20	150.0 mg/m3	150 mg/m3	
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Criterion / Indicator		Assessment Findings	Compliance
		Dec 2019 is 366938mt concluding compliance to the license requirement.	
<b>4.3.1.2</b>	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>The Legal Requirements Register (LRR) covers all the necessary regulatory requirements. The LRR for was reviewed on 20/1/20. The list of applicable legal and other requirements was made available during the assessment and complied in the Sustainability Management Procedure Manual SMP-GPB-22 having revision no. 6. The list comprises of the following sections</p> <ul style="list-style-type: none"> <li>a) Environment / Safety &amp; Health / Social</li> <li>b) Best practices &amp; other requirements</li> <li>c) International Standards Requirement</li> </ul> <p>Among others the identified applicable laws and regulations relevant to its operations included the;</p> <ul style="list-style-type: none"> <li>a) Environmental Quality Act 1974 and its Regulations,</li> <li>b) Factories and Machinery Act 1967 and its Regulations,</li> <li>c) Occupational Safety and Health Act 1994 and its Regulations,</li> <li>d) Pesticides Act, 1974,</li> <li>e) Worker’s Minimum Standards of Housing &amp; Amenities Act, 1990.</li> <li>f) Wildlife conservation Act 2010</li> <li>g) Malaysian Palm Oil Board 1998</li> </ul>	Complied



Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>h) Holiday Act 1951</li> <li>i) Passport Act 1966</li> <li>j) Workers Union Act 1959</li> <li>k) Estate Hospital Assistants (Registration) Act 1965</li> <li>l) Petroleum (safety Measures) Act 1984</li> <li>m) Fire Services Act 1984</li> <li>n) Uniform Building by Laws 1986</li> <li>o) Weights and Measures Act 1972 (Act 71) (Amendment 1981)</li> </ul>	
<b>4.3.1.3</b>	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p><b>- Major compliance -</b></p>	<p>The Sustainability Department (SD) based Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills. SD which is based in <i>Wisma Genting</i> is responsible for tracking any changes to the Acts and Regulations. In addition, the SVP Processing (Malaysia) &amp; Downstream Manufacturing also played a role in disseminating new Acts &amp; Regulations to all the mills in the Group.</p> <ul style="list-style-type: none"> <li>a) This was made via communication with the publisher of the documents.</li> <li>b) This mechanism was outlined in its procedure.</li> <li>c) The updating of the legal register is made on a periodical basis.</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>d) Changes in the legal register if any are communicated to the respective regions.</p> <p>The mill had entirely adopted the GPB established documented system for identifying, tracking, accessing and updating the legal requirements. It had ensured that all applicable legal requirements pertaining to MSPO are established, implemented and maintained. The latest revision on the LRR was made dated 31/1/19 on the following changes;</p> <ul style="list-style-type: none"> <li>a) Minimum Wages Order 2018</li> <li>b) Drainage and Irrigation Ordinance 1956</li> <li>c) Sabah water resources enactment 1998</li> <li>d) EIA Order 2005</li> <li>e) Wildlife Conservation Enactment 1997</li> <li>f) Forest Enactment 1968 (Sabah)</li> <li>g) Employment Insurance Scheme Act 2017</li> <li>h) Sabah Labour Ordinance Cap 67, 1950</li> <li>i) Sabah Biodiversity Enactment 2000</li> </ul>	
<b>4.3.1.4</b>	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.	The Mill Manager appoints the Assistant Engineer <i>Mr Constance Joe Ondi Mill Engineer</i> as the PIC for updating changes in laws at GSOM. Letter dated 15/01/2020 was sighted and verified. The last review was dated 20/1/20.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.  - Major compliance -	The Genting Tanjung POM is sited within Genting Tanjung Estate land banks at block 10, division 1 of Genting Tanjung Estate. Total area for POM is 21.75 ha and can be verified through area statement and quit rent.	Complied
<b>4.3.2.2</b>	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.  - Major compliance -	The mill operates on legal ownership of land. Details as follows; <ul style="list-style-type: none"> <li>a) Land titles no 095327129 – Land Ordinance CAP 68 Section 109 Scheduled XVII. Plan no 09124739 69AI.</li> <li>b) District of Kinabatangan Locality Tenegang.</li> <li>c) Geocode 69154217</li> <li>d) Period from 01/01/1988-31/12/2096.</li> </ul>	Complied
<b>4.3.2.3</b>	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.  - Major compliance -	The mill is separated through fencing around the vicinity. The effluent ponds are located at a distance from the processing area as larger space is required. The mill is located within Genting Tanjung Estate Company of the same certification unit.	Complied
<b>4.3.2.4</b>	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC).	There was no dispute reported. Should there be any dispute, the Sustainability Management Procedure for Negotiation, Compensation and Handling Procedure; SMP-GPB-18; Rev. 03; dated 29/12/2017 will be utilised.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	No land is encumbered by customary rights.	Complied
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	No land is encumbered by customary rights.	Complied
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	No land is encumbered by customary rights.	Complied
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	The Social assessment for Genting Tanjung Palm Oil Mill (GTOM) was conducted internally by the Sustainability Department. The last SIA was conducted in October 2018. Key areas identified in the SIA were on economic livelihood/quality of life, environment and health, wellbeing and community, families and individuals. Both positive and negative impacts were identified in the SIA.  The recommendation from the SIA report was transferred to action plan. The action plan identified the issues & strategies, action plan,	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		responsible person and time frame for both positive and negative impact.	
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented. <b>- Major compliance -</b>	A system for dealing with complaints and grievances is written under Sustainability Management Procedure Manual, SMPGPB- 17: Procedures for Consultation and Communication, rev:02 dated 8/1/2018.	Complied
<b>4.4.2.2</b>	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. <b>- Major compliance -</b>	All complaints were resolved in timely manner. Acknowledgement by signatures of the complainant were available in the complaint/grievance book form.	Complied
<b>4.4.2.3</b>	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. <b>- Minor compliance -</b>	Complaint forms were available in Complaints/Grievances Record Book. The format includes the information such as name of complainant, passport/NRIC, phone no., address, issue, date of complaint, details of action taken, verification by manager and acknowledgement by complainant.	Complied
<b>4.4.2.4</b>	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. <b>- Minor compliance -</b>	Made aware through stakeholders' meetings. Minutes of meeting were available for verification. The last meeting was conducted in October 2019 and the next one is planned in October 2020.	Complied
<b>4.4.2.5</b>	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.	Based on verification of the Complaint/Grievance Book, the last 24 months records were still available i.e. July 2018 (form no. 029).	Complied

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- Major compliance -			
<b>Criterion 4.4.3:</b> Commitment to contribute to local sustainable development			
<b>4.4.3.1</b>	<p>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.</p> <p>- Minor compliance -</p>	<p>Contribution to local development is combined with the estate. See Indicator 4.4.3.1 of MSPO Part 3. Nonetheless, the mill has organised some social activities that benefit its own employees such as <i>kenduri</i>, beef give away during Hari Raya Korban and polio vaccination for the children of the mill's employees.</p>	Complied
<b>Criterion 4.4.4:</b> Employees safety and health			
<b>4.4.4.1</b>	<p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>The Safety Policy signed the President /Chief Operating Procedure dated 01/7/18. Therein containing among others the following;</p> <ul style="list-style-type: none"> <li>a) To maintain a safe and healthy working environment for all employees /others</li> <li>b) To comply with all applicable safety legislation, code of practice, requirement.</li> <li>c) Create awareness by providing all relevant information, WI, supervision and training to employees.</li> <li>d) Prevent accidents, injuries, and occupational illness as well as conduct investigations and take necessary steps/actions to ensure such accidents do not recur</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance								
		e) All employees shall be responsible and accountable to achieve the above mentioned practices.									
<b>4.4.4.2</b>	<p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risk of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:               <ul style="list-style-type: none"> <li>i. All employees involved are adequately trained on safe working practices;</li> <li>ii. All precautions attached to products should be properly observed and applied;</li> </ul> </li> <li>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</li> <li>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</li> </ul>	<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 emphasized to the employees as part of the work culture. Content includes among others to prioritize 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 &amp; <i>Bahasa Malaysia</i>.</p> <p>The Mill had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following;</p> <ul style="list-style-type: none"> <li>d) Change in work process</li> <li>e) Revision/changes in legislative requirement</li> <li>f) Occurrence of accidents</li> </ul> <p>HIRARC for the mill was formalized on in 2010 with review made annually. The significant and routine activities for the mill were adequately covered with details as follows. HIRARC recently reviewed 23/6/20 made for EFB press revising the SOP on clearing following an accident 2 day LTI and the endorsement of the newly transferred Manager on 02/1/2020.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Subject</th> <th></th> <th>Subject</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Laboratory</td> <td style="text-align: center;">11</td> <td>Office</td> </tr> </tbody> </table>		Subject		Subject	1	Laboratory	11	Office	Complied
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<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 and the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<table border="1" data-bbox="1048 448 1787 722"> <tr><td>2</td><td>Excavator</td><td>12</td><td>Water treatment plant</td></tr> <tr><td>3</td><td>Sterilizer</td><td>13</td><td>Fabrication FFB cages</td></tr> <tr><td>4</td><td>Workshop</td><td>14</td><td>Heavy vehicles</td></tr> <tr><td>5</td><td>Security</td><td>15</td><td>Boiler</td></tr> <tr><td>6</td><td>Incinerator</td><td>16</td><td>clarification</td></tr> <tr><td>7</td><td>FFB grading</td><td>17</td><td>Electrical</td></tr> <tr><td>8</td><td>store</td><td>18</td><td>Effluent pond</td></tr> <tr><td>9</td><td>Tools &amp; equipment</td><td>19</td><td>CPO/CPK dispatch</td></tr> <tr><td>10</td><td>Empty Bunch Hopper</td><td>20</td><td>Bio Polishing Plant</td></tr> </table> <p>The mill provides training to the workers and staff exposed to pesticides and chemicals. The following training sessions among others were recorded.</p> <table border="1" data-bbox="1048 900 1827 1155"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr><td>1</td><td>16/1/20</td><td>Chemical spillage oil spillage ERP</td><td>Entire</td></tr> <tr><td>2</td><td>07/7/20</td><td>SOP &amp; SOM</td><td>Entire</td></tr> <tr><td>3</td><td>30/4/20</td><td>PPE adherence</td><td>Entire</td></tr> <tr><td>4</td><td>22/1/20</td><td>PPE adherence &amp; requirement</td><td>Entire</td></tr> <tr><td>5</td><td>12/2/20</td><td>Process station SOP &amp; handlings</td><td>Entire</td></tr> <tr><td>6</td><td>17/2/20</td><td>Process station SOP &amp; handling</td><td>Entire</td></tr> <tr><td>7</td><td>24/10/19</td><td>SW management</td><td>2</td></tr> </tbody> </table> <p>Details of other training are available 4.4.6.1 (training and competency). OSH programs are also included. Common programs are initiated from HQ level e.g. OSH meeting, workplace inspection, inspection on PPE, training on MSPO/RSPO etc.</p>	2	Excavator	12	Water treatment plant	3	Sterilizer	13	Fabrication FFB cages	4	Workshop	14	Heavy vehicles	5	Security	15	Boiler	6	Incinerator	16	clarification	7	FFB grading	17	Electrical	8	store	18	Effluent pond	9	Tools & equipment	19	CPO/CPK dispatch	10	Empty Bunch Hopper	20	Bio Polishing Plant		Date	Subject	Attendees	1	16/1/20	Chemical spillage oil spillage ERP	Entire	2	07/7/20	SOP & SOM	Entire	3	30/4/20	PPE adherence	Entire	4	22/1/20	PPE adherence & requirement	Entire	5	12/2/20	Process station SOP & handlings	Entire	6	17/2/20	Process station SOP & handling	Entire	7	24/10/19	SW management	2	
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Criterion / Indicator	Assessment Findings	Compliance																		
	<p>The mill provides PPE to the employees relevant to the work handled by the workers. The list of PPE provided among others: General Workers/Workshop Personnel /others. Safety Helmet safety shoes hand gloves, leather gloves, luminous strip /jacket, dust mask. Records of PPE issuance were sighted. During the mill site visit workers were observed to be in approved PPE.</p> <p>The following manuals contained SOP for chemical handling and used as a procedure in handling chemicals titled Quality, Environmental, Safety &amp; Health Manual &amp; Sustainability Manual dated 01/7/17. Both were issued from Head Office and used in all operating units within the Group.</p> <p>The Mill management conducts regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held are recorded below</p> <table border="1" data-bbox="1111 1050 1812 1190"> <thead> <tr> <th>No</th> <th>Date</th> <th>Attendees</th> <th>No</th> <th>Date</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>29/6/20</td> <td>Nil - MCO</td> <td>3</td> <td>20/12/19</td> <td>14</td> </tr> <tr> <td>2</td> <td>06/3/20</td> <td>Nil -MCO</td> <td>4</td> <td>20/9/19</td> <td>14</td> </tr> </tbody> </table> <p>Agenda discussed;</p> <ul style="list-style-type: none"> <li>j) Confirmation of minutes previous meeting</li> <li>k) Workplace inspection report/Accident report</li> </ul>	No	Date	Attendees	No	Date	Attendees	1	29/6/20	Nil - MCO	3	20/12/19	14	2	06/3/20	Nil -MCO	4	20/9/19	14	
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	<ul style="list-style-type: none"> <li>l) Medical surveillance &amp; Audiometric</li> <li>m) Status of Safety Program &amp; Environmental</li> <li>n) First Aid Kit &amp; Fire Extinguishers Report</li> <li>o) HIRARC/Complaint from Employee/External Party.</li> <li>p) Other matters</li> </ul> <p>Workplace inspection are made prior to the OSH meeting.</p> <p>The Mill Manager was appointed as Chairman through letter dated 02/1/20 signed by Senior Manager - Operations.</p> <p>The procedures for accident and emergencies has been established. There is formation of ERP Team &amp; ERP for all the identified incidences. In addition the procedures have been summarised in a chart flow form and displayed for information of all employees in the mill. They includes emergencies relating fire, chemical spillage, oil spillage, effluent overflow.</p> <ul style="list-style-type: none"> <li>e) <i>Ahli J/Kuasa Pasukan Bertindak Kecemasan 2020</i> headed by the Mill Manager</li> <li>f) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Kebakaran</i></li> <li>g) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Minyak</i></li> <li>h) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Kimia</i></li> </ul>	

Criterion / Indicator	Assessment Findings	Compliance																																												
	<p><i>i) Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan effluen</i></p> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SD and amended to tailor to the situation differences in the estate and mill.</p> <table border="1" data-bbox="1048 727 1693 943"> <thead> <tr> <th></th> <th>Emergency situation</th> <th>Mill</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Fire</td> <td>/</td> <td>/</td> </tr> <tr> <td>2</td> <td>Oil spillage</td> <td>/</td> <td></td> </tr> <tr> <td>3</td> <td>Effluent overflow</td> <td>/</td> <td></td> </tr> <tr> <td>4</td> <td>Chemical spillage</td> <td>/</td> <td>/</td> </tr> <tr> <td>5</td> <td>Flood</td> <td></td> <td>/</td> </tr> <tr> <td>6</td> <td>Accident at work place</td> <td></td> <td>/</td> </tr> </tbody> </table> <p>ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The training are conducted by an accredited or qualified organization who can demonstrate their suitability to provide training.</p> <table border="1" data-bbox="1061 1166 1767 1291"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>06/11/19</td> <td>Fire briefing/talk &amp; fire drill</td> <td>Entire</td> </tr> <tr> <td>2</td> <td>26/10/19</td> <td>CPR – First Aid Response</td> <td>50</td> </tr> <tr> <td>3</td> <td>16/01/20</td> <td>Chemical spillage oil spillage ERP</td> <td>Entire</td> </tr> </tbody> </table> <p>The mill trained their assigned employees for First Aid mainly those involved in the process operations. Training program on the first Aider</p>		Emergency situation	Mill	Estate	1	Fire	/	/	2	Oil spillage	/		3	Effluent overflow	/		4	Chemical spillage	/	/	5	Flood		/	6	Accident at work place		/		Date	Subject	Attendees	1	06/11/19	Fire briefing/talk & fire drill	Entire	2	26/10/19	CPR – First Aid Response	50	3	16/01/20	Chemical spillage oil spillage ERP	Entire	
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		<p>was organized on Group basis. The First Aid Kit (box) equipped with approved 16 items were available and replenished on a weekly basis. Distribution of the First Aid Kit for both the estates are made at the following places/personnel;</p> <ul style="list-style-type: none"> <li>- Office / AP Post /</li> <li>- Chemical Store / general store /</li> <li>- Workshop / laboratory</li> </ul> <p>Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKKP 8 a mandatory requirement was submitted to DOSH on 07/1/20. Accident Statistics are being maintained in a satisfactory manner.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="4">No of cases</th> </tr> <tr> <th>LTI</th> <th>LTI</th> <th>Non LTI</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">0</td> <td style="text-align: center;">0</td> <td style="text-align: center;">0</td> <td style="text-align: center;">0</td> </tr> </tbody> </table>	No of cases				LTI	LTI	Non LTI	Total	0	0	0	0	
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<b>Criterion 4.4.5: Employment conditions</b>															
<b>4.4.5.1</b>	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>Covered under Genting Plantations' Social Policy (Incorporating the Labour and Human Rights requirements), dated 22/6/2015, signed by Mr. Yong Chee Kong (President and Chief Operating Officer). Various methods of communication implemented by the estate to communicate the policy to its employees such as display on notice boards, briefing and training.</p>	Complied												
<b>4.4.5.2</b>	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment</p>	<p>Based on interview with employees from different backgrounds, there is no evidence that the management engage in or support any</p>	Complied												

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	<p>regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p><b>- Major compliance -</b></p>	discriminatory practices. The commitment to no discrimination is also stated in the company's social policy.	
<b>4.4.5.3</b>	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	Based on sampled workers (employment no.: E00062, E00066, E00178, E00093, E00030, E00079) pay slips for Dec 2019 and May 2020, it was found that the employer has met the pay and conditions as per agreed in the employment contract agreement.	Complied
<b>4.4.5.4</b>	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p><b>- Minor compliance -</b></p>	There is no evidence that the management has ensured that the employees of contractors e.g. CPO and PK transporters are paid based on legal or industry minimum standards according to the employment contract agreed between the contractors and their employees. Thus, a non-conformity was assigned due to this lapse.	Non-conformity
<b>4.4.5.5</b>	<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><b>- Major compliance -</b></p>	Employee data base is kept and maintained in the computer system (Lyntramax). All the required information by this standard was available in the data based.	Complied
<b>4.4.5.6</b>	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment</p>	Employment contracts were available in language that understood by the workers. The contract has the details about the payments and	Complied

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	contract shall be made available for each and every employee indicated in the employment records. <b>- Major compliance -</b>	employment conditions such as period of working, working hour, medical assistance, housing, holiday, annual leave, period of notice to terminate the contract, etc.	
<b>4.4.5.7</b>	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. <b>- Major compliance -</b>	Time recording system is using punch card and made transparent for both employers and employees. A few samples of punch cards record were verified against pay slips. It was found that the recordings were accurate.	Complied
<b>4.4.5.8</b>	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. <b>- Major compliance -</b>	Working hours and breaks were found to be in line with the legal requirement. There are 2 working shifts i.e. 0900 to 1700 and 1700 to 0100 hour and a flexible half an hour break in between is given.	Complied
<b>4.4.5.9</b>	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. <b>- Major compliance -</b>	Based on sampled pay slips as mentioned in 4.4.5.3, it was found that the wages and overtime payment were in line with the employment contract.	Complied
<b>4.4.5.10</b>	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. <b>- Minor compliance -</b>	Other benefits such as performance bonus was provided by the employer and verifiable in the pay slips. The establishment of estate clinic also provides the medical care for the mill workers and their dependents. Education through HUMANA school is provided for foreign workers dependents.	Complied

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<b>4.4.5.11</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.  - <b>Major compliance</b> -	The workers quarters were found to be habitable and in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446). Treated potable water and electricity were provided to the housing for free of charge. Based on verification of the drinking water analysis, the results were found to be compliance with the National Drinking Water Quality Standards.	Complied
<b>4.4.5.12</b>	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.  - <b>Major compliance</b> -	Sexual Harassment Policy has been established dated 3/8/2009 and signed by the Chief Operating Officer. The awareness of this policy among the workers was made through displaying of the policy at notice boards and briefing by the field staff.	Complied
<b>4.4.5.13</b>	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.  - <b>Major compliance</b> -	There are no trade union members in the estate. Nonetheless, there is also no restriction for them to join any trade union. This is recognized by the employer through establishment of people Policy dated 3/8/2009.	Complied
<b>4.4.5.14</b>	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.  - <b>Major compliance</b> -	Based on the records in the employee's data base system, which has the information about date of birth and date join, there was no children and young person being employed.	Complied

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<b>Criterion 4.4.6: Training and competency</b>																																																																																										
<p><b>4.4.6.1</b> All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p><b>- Major compliance -</b></p>	<p>Bulk of the mill training is organized during the daily briefing prior to work commencement of each shift. Mainly the issues discussed / briefed were related to mill process operations and safety compliance. These training records are maintained in a separate book and were sighted during the audit</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr><td>1</td><td>10/1/20</td><td>Briefing of Company's Policies</td><td>51</td></tr> <tr><td>2</td><td>27/6/20</td><td>OER standing instruction</td><td>Entire</td></tr> <tr><td>3</td><td>04/7/20</td><td>Complaint grievance procedure SOP</td><td>Entire</td></tr> <tr><td>4</td><td>06/11/19</td><td>Fire briefing/talk &amp; fire drill</td><td>Entire</td></tr> <tr><td>5</td><td>26/10/19</td><td>CPR – First Aid Response</td><td>50</td></tr> <tr><td>6</td><td>08/10/19</td><td>Boiler operations</td><td>15</td></tr> <tr><td>7</td><td>22/7/19</td><td>LOTO guidelines</td><td>Entire</td></tr> <tr><td>8</td><td>16/1/20</td><td>Chemical spillage oil spillage ERP</td><td>Entire</td></tr> <tr><td>9</td><td>07/7/20</td><td>SOP &amp; SOM</td><td>Entire</td></tr> <tr><td>10</td><td>27/5/20</td><td>Legal other requirement</td><td>Entire</td></tr> <tr><td>11</td><td>21/5/20</td><td>CPO/CPK desptaches</td><td>5</td></tr> <tr><td>12</td><td>11/1/20</td><td>MSPO RSPO policy briefing</td><td>Entire</td></tr> <tr><td>13</td><td>25/10/19</td><td>Recycling program SW management</td><td>15</td></tr> <tr><td>14</td><td>15/8/19</td><td>Supply chain trace ability &amp; MB</td><td>7</td></tr> <tr><td>15</td><td>13/1/20</td><td>HIRARC &amp; Aspect &amp; Impact</td><td>48</td></tr> <tr><td>16</td><td>22/2/20</td><td>Zero burning</td><td>Entire</td></tr> <tr><td>17</td><td>30/4/20</td><td>PPE adherence</td><td>Entire</td></tr> <tr><td>18</td><td>22/1/20</td><td>PPE adherence &amp; requirement</td><td>Entire</td></tr> <tr><td>19</td><td>12/2/20</td><td>Process station SOP &amp; handling</td><td>Entire</td></tr> <tr><td>20</td><td>17/2/20</td><td>Process station SOP &amp; handling</td><td>Entire</td></tr> <tr><td>21</td><td>19/10/19</td><td>Workshop operations</td><td>15</td></tr> </tbody> </table>		Date	Subject	Attendees	1	10/1/20	Briefing of Company's Policies	51	2	27/6/20	OER standing instruction	Entire	3	04/7/20	Complaint grievance procedure SOP	Entire	4	06/11/19	Fire briefing/talk & fire drill	Entire	5	26/10/19	CPR – First Aid Response	50	6	08/10/19	Boiler operations	15	7	22/7/19	LOTO guidelines	Entire	8	16/1/20	Chemical spillage oil spillage ERP	Entire	9	07/7/20	SOP & SOM	Entire	10	27/5/20	Legal other requirement	Entire	11	21/5/20	CPO/CPK desptaches	5	12	11/1/20	MSPO RSPO policy briefing	Entire	13	25/10/19	Recycling program SW management	15	14	15/8/19	Supply chain trace ability & MB	7	15	13/1/20	HIRARC & Aspect & Impact	48	16	22/2/20	Zero burning	Entire	17	30/4/20	PPE adherence	Entire	18	22/1/20	PPE adherence & requirement	Entire	19	12/2/20	Process station SOP & handling	Entire	20	17/2/20	Process station SOP & handling	Entire	21	19/10/19	Workshop operations	15	<p>Complied</p>
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		24	24/3/20	FFB reception	20																																																	
<b>4.4.6.2</b>	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p><b>- Major compliance -</b></p>	<p>This requirement has been established and sighted. It is adequate to address the requirement of the employees' training needs. The details of the training needs include categories of job descriptions, sections, and employees group. Included in this program are subjects related to environment e.g. environmental, safety &amp; health policy, scheduled waste management, environmental responsibility, HCV &amp; Biodiversity training, field activities, equipment handling, vehicles maintenance etc.</p>				Complied																																																
<b>4.4.6.3</b>	<p>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.</p> <p><b>- Minor compliance -</b></p>	<p>The annual training program has been established and significantly covers all aspects of the RSPO requirements. There were also additional subjects including the mill operating procedures, parameters of mill produce, machinery maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects. The subjects for the training are issued and assisted by the SD personnel. The following topics included in the annual training program 2019 among others as shown below;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">(Mill ) subject</th> <th colspan="3">Schedule/month</th> </tr> <tr> <th>1-4</th> <th>5-9</th> <th>10-12</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Mill Security</td> <td>-</td> <td>/</td> <td>-</td> </tr> <tr> <td>2</td> <td>ESH policy objective, target &amp; program</td> <td>/</td> <td>-</td> <td>-</td> </tr> <tr> <td>3</td> <td>New FW – procedure</td> <td>/</td> <td>-</td> <td>-</td> </tr> <tr> <td>4</td> <td>Duties of production supervisor</td> <td>/</td> <td>-</td> <td>-</td> </tr> <tr> <td>5</td> <td>ESH role &amp; function</td> <td>/</td> <td>-</td> <td>-</td> </tr> <tr> <td>6</td> <td>Competency, training &amp; awareness</td> <td>/</td> <td>-</td> <td>-</td> </tr> <tr> <td>7</td> <td>ERP procedure and evacuation</td> <td>-</td> <td>/</td> <td>-</td> </tr> <tr> <td>8</td> <td>Legal &amp; other requirement</td> <td>-</td> <td>/</td> <td>-</td> </tr> </tbody> </table>					(Mill ) subject	Schedule/month			1-4	5-9	10-12	1	Mill Security	-	/	-	2	ESH policy objective, target & program	/	-	-	3	New FW – procedure	/	-	-	4	Duties of production supervisor	/	-	-	5	ESH role & function	/	-	-	6	Competency, training & awareness	/	-	-	7	ERP procedure and evacuation	-	/	-	8	Legal & other requirement	-	/	-	Complied
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		9	Permit TW/handling of tools equipment	/	-	-	
		10	HIRARC & EAI	-	/	-	
		11	Non Conformity Action	-	/	-	
		12	Complaint & grievance procedure	-	/	-	
		13	SOP & ECP for individual procedure	-	/	-	
		14	PPE adherence	-	/	-	
		15	Aspect / Impact	/	-	-	
		16	OER project – standing instruction	-	-	/	
		17	Scheduled waste management	-	-	/	
		18	Supplier selection & evaluation	-	/	-	
		19	Process monitoring & WA reporting	-	-	/	
		20	Noise training	-	-	/	
		21	Electrical main switch board	-	-	/	
		22	Non-conformity	-	-	/	
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>							
<b>Criterion 4.5.1: Environmental Management Plan</b>							
<b>4.5.1.1</b>	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.  <b>- Major compliance -</b>	The Group Environmental Policy had been established and implemented for all Mills and Estates. The policy was signed by the President / Chief Operating Officer of <i>Genting Plantations Bhd</i> dated 21 Dec 2009 and displayed prominently on notice boards in English and local language <i>Bahasa Malaysia</i> . The Policy is implemented along with other Policies through the OSH activities by the on-site Safety Officers and monitored by OSH/Sustainability Unit from Head Office. Included in the Policy among others are the following commitment; a) Commitment and protection of the environment according to the applicable laws.					Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>b) Establishment of environmental management plan developed from results of aspect and impact analysis, mitigation, monitoring plans and records of implementation with time lines.</li> <li>c) Continual improvement program</li> <li>d) Awareness through training / briefing program &amp; session to all employees and stakeholders.</li> </ul> <p>During interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the basic objectives and intention of the Policy.</p>	
<b>4.5.1.2</b>	<p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> <li>a) An environmental policy and objectives;</li> <li>b) The aspects and impacts analysis of all operations</li> </ul> <p><b>- Major compliance -</b></p>	<p>The mill has identified the environmental objectives for implementation in 2020 among others;</p> <ul style="list-style-type: none"> <li>a) BOD level &lt; 215 ppm.</li> <li>b) Reduce water consumption not more 0.9m3/mt FFB</li> <li>c) POME generated per FFB processed at 75% /FFB</li> </ul> <p>Interviews with the workers and staff during the site visit revealed that the employees had been briefed and understood on the environmental protection in the mill.</p> <p>The aspects and impacts of all operations has been identified and formalized among others as described in the following environment improvement and management plan. It is being reviewed on yearly basis.</p>	Complied

Criterion / Indicator		Assessment Findings			Compliance
			Source	Negative Impacts	
		<i>A</i>	<i>Water</i>		
		1	Consumption of water for mill operation/residence	Water wastage	
		2	Contamination of water with chemical & organic matter into ground water	Loss of habitat, food resources & breeding	
		3		Poor water quality for consumption	
		4	Pollution from mill operations & effluent	Mill waste by product bunch ash/boiler ash.	
		5		Mill effluent / POME	
		<i>B</i>	<i>Noise Pollution</i>		
		1	Noise pollution from mill operations	Hearing impairment to employees	
		<i>2</i>	<i>GHG Emission</i>		
		3	Contributions to greenhouse gas emission	Emission of methane from POME	
<b>4.5.1.3</b>	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.  <b>- Major compliance -</b>	The improvement and mitigation plan as initiated are given in the following table.			Complied
			Negative Impact	Improvement/Mitigation Plan	
		1	Water wastage	Optimise usage & reduce wastage	
		2	Loss of habitat, food resources & breeding	Isolate the treated & contaminated water from discharge to monsoon drain	
		3	Poor water quality for consumption	To ensure the water usage used as necessary to prevent depletion of clean water sources.	

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		4	Mill effluent / POME	To reduce BOD level at final discharge <20 ppm. To prevent overflowing during pumping into flatbeds																																							
		5	Flooding due to exposure surface for soil erosion by construction	To ensure the surface exposed being covered & well maintained																																							
		7	Hearing impairment to employees	To control noise generated from mill operation through audiometric monitoring																																							
		All actions are to be monitored on the indicated frequency shown in the plan.																																									
<b>4.5.1.4</b>	A programme to promote the positive impacts should be included in the continual improvement plan.  <b>- Minor compliance -</b>	This is available and compiled and incorporated in the details as provided in 4.5.1.3 above.			Complied																																						
<b>4.5.1.5</b>	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives.  <b>- Major compliance -</b>	<p>A training program is available in the Mill Training Plan 2020 updated on yearly basis and revised as per the management requirement. Included in this plan is the internal and external program. Subjects among others identified related to environment are;</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">(Mill ) subject</th> <th colspan="3">schedule</th> </tr> <tr> <th>1-4</th> <th>5-9</th> <th>9-12</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Requirement MSPO RSPO</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>2</td> <td>ESH policy objective, target &amp; program</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>3</td> <td>ESH role &amp; function</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>4</td> <td>Legal &amp; other requirement</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>5</td> <td>HIRARC &amp; EAI</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>6</td> <td>Scheduled waste management</td> <td></td> <td></td> <td>/</td> </tr> </tbody> </table>				(Mill ) subject	schedule			1-4	5-9	9-12	1	Requirement MSPO RSPO	/			2	ESH policy objective, target & program	/			3	ESH role & function	/			4	Legal & other requirement		/		5	HIRARC & EAI		/		6	Scheduled waste management			/	Complied
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<b>4.5.1.6</b>	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.  - Major compliance -	Environmental issues are also discussed during the weekly briefing & also during the stakeholders & ESH meetings. Minutes were sighted and verified.	Complied																																	
<b>Criterion 4.5.2:</b> Efficiency of energy use and use of renewable energy																																				
<b>4.5.2.1</b>	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period  - Major compliance -	Monthly and annual records on energy consumption for non-renewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Sighted tabulation of data maintained by the mill.  <table border="1"> <thead> <tr> <th></th> <th>Year</th> <th>FFB processed</th> <th>Diesel /mt FFB</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2015</td> <td>444024</td> <td>0.478</td> </tr> <tr> <td>2</td> <td>2016</td> <td>405546</td> <td>0.750</td> </tr> </tbody> </table>		Year	FFB processed	Diesel /mt FFB	1	2015	444024	0.478	2	2016	405546	0.750	Complied																					
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		3	2017	303094	0.809													
		4	2018	356317	0.637													
		5	2019	363938	0.524													
		<p>Performance of /mt FFB above vary from lowest 0.478 to highest 0.809 over span of 5 years. There were variation in baseline figures between the mills in the Group attributed by factors i.e. mill throughput, design, machine line up and technology input, no of diesel engine etc. The Mill had management plan dated Jan 2020 to improve the efficiency of diesel usage and to optimize renewable energy details of which are shown below</p>																
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		3	Internal mill vehicle	FFB cages push in & out	To use winch for FFB cages push in & out from sterilizer & unloading ramp.		
		4	Diesel usage/year	To maintain and reduce diesel consumption	Change diesel gen set to SEB during non-processing hours.		
<b>4.5.2.2</b>	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. <b>- Major compliance -</b>	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel used by contractors, including all transport and machinery operations are available in the mill annual budget. This was sighted in the 2020 annual estimate.				Complied	
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible. <b>- Minor compliance -</b>	The fibre and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fibre are delivered to estates for multi-purpose or sold to outside buyers. EFB is used in the estates for mulching. The quantum of fibre and shell produced from the mill processing is calculated based on the mass ratio i.e. shell and fibre approx. at 6% and 13 % of the FFB respectively. The ratio of fibre/shell utilized in the boiler is recorded as follows;				Complied	
			Year	2016	2017	2018	2019
		1	FFB /mt	405546	303094	356317	363938
		2	Fibre used	58012	43466	50982	52076
		3	Fibre/shell / FFB	0.143	0.143	0.143	0.143



Criterion / Indicator		Assessment Findings	Compliance																											
<b>Criterion 4.5.3:</b> Waste management and disposal																														
<b>4.5.3.1</b>	<p>All waste products and sources of pollution shall be identified and documented.</p> <p><b>- Major compliance -</b></p>	<p>All waste and pollution are identified and documented in the Waste Management. The compilation for 2020 was guided by the Sustainability Department applicable to both estates and mills. Details of waste generated and the source arising from the mill operations/activities among others are shown below;</p> <table border="1"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Location/Source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste -rubbish</td> <td>Line sites, office, workshop, store,</td> </tr> <tr> <td>2</td> <td>Industrial Waste -Scrap metal</td> <td>Workshop operations</td> </tr> <tr> <td>3</td> <td>Recyclable Waste-Plastic, glass, paper</td> <td>Line site, office, residential complex</td> </tr> <tr> <td>4</td> <td>Scheduled Waste 404 Clinical waste</td> <td>clinic</td> </tr> <tr> <td>5</td> <td>Scheduled Waste rags, plastics, filters,</td> <td>Mill processing activities Workshop</td> </tr> <tr> <td>6</td> <td>Scheduled Waste Spent lubricant &amp; hydraulic oil</td> <td>Workshop</td> </tr> <tr> <td>7</td> <td>Scheduled Waste Disposed containers, bags, equipment contaminated with chemicals (Boiler Treatment),</td> <td>Mill processing activities, scheduled waste store.</td> </tr> <tr> <td>8</td> <td>Biomass Waste-Fiber /Shell</td> <td>Waste from extraction of oil and kernel.</td> </tr> </tbody> </table>		Type of waste	Location/Source	1	Domestic waste -rubbish	Line sites, office, workshop, store,	2	Industrial Waste -Scrap metal	Workshop operations	3	Recyclable Waste-Plastic, glass, paper	Line site, office, residential complex	4	Scheduled Waste 404 Clinical waste	clinic	5	Scheduled Waste rags, plastics, filters,	Mill processing activities Workshop	6	Scheduled Waste Spent lubricant & hydraulic oil	Workshop	7	Scheduled Waste Disposed containers, bags, equipment contaminated with chemicals (Boiler Treatment),	Mill processing activities, scheduled waste store.	8	Biomass Waste-Fiber /Shell	Waste from extraction of oil and kernel.	Complied
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<p><b>4.5.3.2</b></p> <p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <ul style="list-style-type: none"> <li>a) Identifying and monitoring sources of waste and pollution.</li> <li>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</li> </ul> <p><b>- Major compliance -</b></p>	<p>The waste management plan for 2020 was compiled and reviewed annually and has been implemented. Details as follows;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Domestic waste rubbish</td> <td>Collection/disposal 2x/week to the Genting Tanjung estate designated landfill.</td> </tr> <tr> <td style="text-align: center;">2</td> <td>Industrial Waste -Scrap metal</td> <td>Inventory maintained, tender at zone level for sale to licensed contractors</td> </tr> <tr> <td style="text-align: center;">3</td> <td>Recyclable Waste -Plastic, glass, paper</td> <td>Storage and later for sale to licensed buyers every quarterly.</td> </tr> <tr> <td style="text-align: center;">4</td> <td>SW 404 Clinical waste</td> <td>Inventory maintained in the estate. Storage in sharp bin in clinic. Disposal through via the estate.</td> </tr> <tr> <td style="text-align: center;">5</td> <td>SW rags, plastics, filters,</td> <td>Inventory maintained. Storage in scheduled waste store. Disposal to licensed contractor Lagenda Bumimas Sdn Bhd.</td> </tr> <tr> <td style="text-align: center;">6</td> <td>SW Spent lubricant &amp; hydraulic oil</td> <td>Inventory maintained. Storage in scheduled waste store. Disposal to licensed contractor Lagenda Bumimas Sdn Bhd.</td> </tr> <tr> <td style="text-align: center;">7</td> <td>SW Disposed containers, bags, equipment contaminated with chemicals (Boiler Treatment),</td> <td>Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by Lagenda Bumimas Sdn Bhd.</td> </tr> <tr> <td style="text-align: center;">8</td> <td>Biomass Waste Fiber /Shell</td> <td>Reuse as fuel in the boiler combustion</td> </tr> </tbody> </table>			Type of waste	Action to be taken	1	Domestic waste rubbish	Collection/disposal 2x/week to the Genting Tanjung estate designated landfill.	2	Industrial Waste -Scrap metal	Inventory maintained, tender at zone level for sale to licensed contractors	3	Recyclable Waste -Plastic, glass, paper	Storage and later for sale to licensed buyers every quarterly.	4	SW 404 Clinical waste	Inventory maintained in the estate. Storage in sharp bin in clinic. Disposal through via the estate.	5	SW rags, plastics, filters,	Inventory maintained. Storage in scheduled waste store. Disposal to licensed contractor Lagenda Bumimas Sdn Bhd.	6	SW Spent lubricant & hydraulic oil	Inventory maintained. Storage in scheduled waste store. Disposal to licensed contractor Lagenda Bumimas Sdn Bhd.	7	SW Disposed containers, bags, equipment contaminated with chemicals (Boiler Treatment),	Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by Lagenda Bumimas Sdn Bhd.	8	Biomass Waste Fiber /Shell	Reuse as fuel in the boiler combustion	<p>Complied</p>
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		The above initiative and management plan is also a common practice within the industry elsewhere.																									
<b>4.5.3.3</b>	<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><b>- Major compliance -</b></p>	<p>The procedures for handling used chemicals classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by Head Office personnel and implemented in all estates and mills for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows;</p> <ul style="list-style-type: none"> <li>a) Management of class 2 (and higher) chemical containers.</li> <li>b) Management of fertilizer bags</li> </ul> <p>These documents were established on 13/8/2009 (OSH Manual) and 01/8/2013 (Sustainability Manual) and remained effective for practice in all estates and mills. The mill despatched the scheduled waste to Lagenda Bumimas Sdn Bhd with details as follows;</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>SW type</th> <th>Quantity</th> <th></th> <th>SW type</th> <th>Quantity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SW 102</td> <td>0.050 mt</td> <td>4</td> <td>SW 409</td> <td>0.044 mt</td> </tr> <tr> <td>2</td> <td>SW 110</td> <td>0.001 mt</td> <td>5</td> <td>SW 410</td> <td>0.114 mt</td> </tr> <tr> <td>3</td> <td>SW 408</td> <td>0.019 mt</td> <td>6</td> <td>SW 305</td> <td>1000 L</td> </tr> </tbody> </table> <p>The previous collection was dated 25/6/2019. Minor delay in view of the nation MCO compliance.</p>		SW type	Quantity		SW type	Quantity	1	SW 102	0.050 mt	4	SW 409	0.044 mt	2	SW 110	0.001 mt	5	SW 410	0.114 mt	3	SW 408	0.019 mt	6	SW 305	1000 L	Complied
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<b>4.5.3.4</b>	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.	Both the estates/mill disposed their domestic waste to the designated landfill located in the host estate. All domestic wastes are collected 2x/week by the Genting Tanjung Estate management.	Complied																								

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<b>Criterion 4.5.4:</b> Reduction of pollution and emission																				
<b>4.5.4.1</b> An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.  <b>- Major compliance -</b>	This is available in the Mill Pollution Prevention Plan 2020. Among others the mill has identified activities producing pollution in the following in the 2020 plan. <table border="1" style="margin-left: 40px;"> <thead> <tr> <th></th> <th>Pollution Source</th> <th>Specific Concern</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>FFB Receiving</td> <td>Air Pollution Noise Pollution</td> </tr> <tr> <td>2</td> <td>Vehicle parking area</td> <td>Water &amp; soil pollution due to leakages from vehicles Generation of scheduled waste</td> </tr> <tr> <td>3</td> <td>FFB sterilisation</td> <td>Water pollution Generation of scheduled waste</td> </tr> <tr> <td>4</td> <td>CPO Clarification</td> <td>Water pollution Risk of contaminated CPO with oil</td> </tr> <tr> <td>5</td> <td>Nut cracking &amp; CPK Production</td> <td>Air Pollution Water pollution</td> </tr> </tbody> </table> Mainly the mill identified source of pollution from their processing activities at the identified stations.		Pollution Source	Specific Concern	1	FFB Receiving	Air Pollution Noise Pollution	2	Vehicle parking area	Water & soil pollution due to leakages from vehicles Generation of scheduled waste	3	FFB sterilisation	Water pollution Generation of scheduled waste	4	CPO Clarification	Water pollution Risk of contaminated CPO with oil	5	Nut cracking & CPK Production	Air Pollution Water pollution	Complied
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<b>4.5.4.2</b> An action plan to reduce identified significant pollutants and emissions shall be established and implemented.  <b>- Major compliance -</b>	The action plan/mitigation measures taken to reduce the identified pollutants are described in the following; <table border="1" style="margin-left: 40px;"> <thead> <tr> <th></th> <th>Pollution Source</th> <th>Action Plan/Mitigation Measures</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>FFB Receiving</td> <td>Regular servicing maintenance of vehicles/machinery Engine OFF while awaiting entrance to the ramp</td> </tr> </tbody> </table>		Pollution Source	Action Plan/Mitigation Measures	1	FFB Receiving	Regular servicing maintenance of vehicles/machinery Engine OFF while awaiting entrance to the ramp	Complied												
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				Ensure major traffic areas are away from residential complex, signage on speed limit, Tray provided for the drivers to be used underneath their vehicle during stationary. Used gloves & contaminated fibre to treat as scheduled waste.	
		2	Vehicle parking area	Used gloves & contaminated fibre to treat as scheduled waste.	
		3	FFB sterilisation	Install & maintain oil trap at monsoon drains if steriliser condensate is leaking. Discharge steriliser condensate into sludge pit for recovery purposes Used glove & contaminated fibre to treat as scheduled waste.	
		4	CPO Clarification	Install & maintain high level siren at sludge tank, hot water tank & CPO tank Channel all spillages to sludge pit for recovery purposes. Recover oil from sludge pit to oil room for reprocessed. Regular service & maintenance of machinery Containment via bunds for machinery/gearbox	
		5	Nut cracking & CPK Production	Install cover plate at particular machine e.g. cracker mixture. Reduce the frequency of floor washing	
<b>4.5.4.3</b>	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be	The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily.			Complied

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	<p>in accordance with the respective state and national policies and regulations.</p> <p><b>- Major compliance -</b></p>	<p>Genting Tanjung POM records the effluent monitoring for DOE submission in the '<i>Borang Penyata Suku Tahunan</i>'. Details as follows;</p> <table border="1"> <thead> <tr> <th></th> <th>Parameter</th> <th>standard</th> <th>28/4/20</th> <th>22/5/20</th> <th>24/6/20</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>5.0-9.0</td> <td>8.20</td> <td>8.00</td> <td>7.00</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>20.00</td> <td>16.50</td> <td>14.10</td> <td>12.80</td> </tr> <tr> <td>3</td> <td>COD</td> <td>-</td> <td>251.0</td> <td>178.0</td> <td>93.0</td> </tr> <tr> <td>4</td> <td>Total Solids</td> <td>-</td> <td>780</td> <td>610</td> <td>520</td> </tr> <tr> <td>5</td> <td>S Solids</td> <td>200</td> <td>150</td> <td>80</td> <td>49</td> </tr> <tr> <td>6</td> <td>O&amp;G</td> <td>20</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>7</td> <td>A Nitrogen</td> <td>150</td> <td>0</td> <td>1.64</td> <td>0</td> </tr> <tr> <td>8</td> <td>Total Nitrogen</td> <td>200</td> <td>8.70</td> <td>5.40</td> <td>5.10</td> </tr> </tbody> </table> <p>The Mill license was for land application and the requirement is for the BOD to be less than 20mg/l. Effluent samples are analysed in Dynakey Laboratories Sdn Bhd.</p>		Parameter	standard	28/4/20	22/5/20	24/6/20	1	PH	5.0-9.0	8.20	8.00	7.00	2	BOD	20.00	16.50	14.10	12.80	3	COD	-	251.0	178.0	93.0	4	Total Solids	-	780	610	520	5	S Solids	200	150	80	49	6	O&G	20	0	0	0	7	A Nitrogen	150	0	1.64	0	8	Total Nitrogen	200	8.70	5.40	5.10	
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<p><b>4.5.5.1</b></p> <p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> <li>a) Assessment of water usage and sources.</li> <li>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill’s current activities.</li> <li>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.).</li> </ul> <p><b>- Major compliance -</b></p>	<p>The Water Management Plan 2020 for the mill has been established with latest review on June 2020. The plan emphasized on the following areas.</p> <ul style="list-style-type: none"> <li>a) Water source/Efficient use of water</li> <li>b) Renew-ability of water source</li> <li>c) Avoidance of surface and ground water contamination</li> </ul> <p>Details of the action plan and monitoring among others are tabled as follows;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2">Areas of concerns</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td rowspan="2" style="text-align: center;">1</td> <td style="text-align: center;">Water source</td> <td>Water from catchment pond Supply to residential areas /complex for all divisions Use for mill processing and washing.</td> </tr> <tr> <td style="text-align: center;">Rain Harvest</td> <td>Use for general compound and washing.</td> </tr> <tr> <td rowspan="3" style="text-align: center;">2</td> <td style="text-align: center;">Efficient use of water</td> <td>Residential areas Monitoring of pipes leakages</td> </tr> <tr> <td style="text-align: center;">&amp; reduce wastage</td> <td>Optimize usage &amp; reduce wastage Recycle coolant water from engine room back to water system. Reduce floor washing by sweeping.</td> </tr> <tr> <td style="text-align: center;">Education/training</td> <td>Promote water conservation/awareness among employees</td> </tr> <tr> <td style="text-align: center;">3</td> <td style="text-align: center;">Renewability water source</td> <td>Rain water capture at catchment Monitoring of pond level and daily rainfall.</td> </tr> </tbody> </table>		Areas of concerns		Action Plan	1	Water source	Water from catchment pond Supply to residential areas /complex for all divisions Use for mill processing and washing.	Rain Harvest	Use for general compound and washing.	2	Efficient use of water	Residential areas Monitoring of pipes leakages	& reduce wastage	Optimize usage & reduce wastage Recycle coolant water from engine room back to water system. Reduce floor washing by sweeping.	Education/training	Promote water conservation/awareness among employees	3	Renewability water source	Rain water capture at catchment Monitoring of pond level and daily rainfall.	<p>Complied</p>
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		4	Avoidance of surface/ground water contamination	Rain water harvest	Collection through gutter and usage for floor cleaning.	
				Contamination of surface and ground water through runoff soil, nutrients or chemicals, disposal of POME	Inspection of bund/ secondary compartment for CPO, chemical storage area including SW store & machinery.	
					Proper arrangement of EFB to estate.	
					Land irrigation application for POME discharge	
					Educate ERPT during event of spillages.	
				Outgoing water into main natural waterways be monitored activities with possible negative impact.	To monitor water quality	
					To monitor BOD of POME	
					To maintain good condition of sewage system.	
				Drainage system	To ensure landfill >400 m from river/water source to prevent contamination.	
					Maintenance of flatbed/furrow for proper flow.	
Water pollution control	Free flow drains & scheduled maintenance					
	To monitor the water quality for drinking water upstream/downstream water, boundary water, mill discharge water.					
5	Others	To ensure plantations activities do	To monitor water quality through analysis of hulu/hilir, boundary & outlet.			



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			not cause adverse impacts to water source of local communities, employees & families.	Monitoring of chemical consumption used for water treatment plant. rainfall,	Monitoring of chemical consumption used for water treatment plant. rainfall																															
<p>Water samples are taken monthly from Sg Labuk to trace conformity of indication of being non-polluted. Parameters checked as follows.</p> <table border="1"> <thead> <tr> <th></th> <th>Parameter</th> <th>INQWS limit</th> <th></th> <th>Parameter</th> <th>INQWS limit</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>5-9</td> <td>5</td> <td>SS</td> <td>ND</td> </tr> <tr> <td>2</td> <td>COD</td> <td>&lt;100</td> <td>6</td> <td>TS</td> <td>-</td> </tr> <tr> <td>3</td> <td>BOD</td> <td>&lt;12</td> <td>7</td> <td>VFA</td> <td>-</td> </tr> <tr> <td>4</td> <td>AN</td> <td>&lt;2.7</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table> <p>The water consumption 2019/2020 used in the mill is recorded and checked against the optimum level. Reasons for the irregularities usage were remarked accordingly.</p>								Parameter	INQWS limit		Parameter	INQWS limit	1	pH	5-9	5	SS	ND	2	COD	<100	6	TS	-	3	BOD	<12	7	VFA	-	4	AN	<2.7	-	-	-
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Criterion / Indicator		Assessment Findings				Compliance
		Month	FFB/mt	water process/L	Water L/ mt FFB	
		July19	26679	49357	0.95	
		Aug19	26892	55007	1.06	
		Sept 19	29382	59975	1.08	
		Oct 19	34180	72564	1.10	
		Nov 19	28559	59894	0.99	
		Dec 19	31333	68462	1.09	
		Jan 19	24821	43362	1.01	
		Feb19	24388	43919	1.08	
		Mac 19	18988	42359	1.34	
		April 19	22925	44763	1.12	
		May 19	29951	48695	0.94	
		June 19	30397	55997	1.15	
<b>4.5.5.2</b>	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.  - <b>Major compliance</b> -	The mill adopts a land application system on furrows. Area of application as stipulated in the DOE <i>Jadual Pematuhan</i> .				Complied
<b>4.6 Principle 6: Best Practices</b>						
<b>Criterion 4.6.1: Mill Management</b>						
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  - <b>Major compliance</b> -	The SOP for the estates and mill operations are available which is prepared on Group basis. There are levels/types of the documentation identified as follows; f) Quality, Environmental, Safety & Health & Sustainability Manual – 01/7/17				Complied

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Criterion / Indicator		Assessment Findings	Compliance
		g) System Procedure – 01/1/2012 h) Procedure Manual – 02/1/2018 i) SOM Standard Operating Manual – 2013 j) Sustainability Mgmt Procedure Manual 1/8/13 rev 7/2/19. k) Safe Operating Procedure – 01/1/2011 <ul style="list-style-type: none"> <li>- Crane/empty bunch hopper/oil room /press &amp; digester</li> <li>- Kernel plant/boiler station/engine/effluent pond</li> <li>- Workshop operations/decanter/despatches</li> <li>- Bio Polishing Plant</li> </ul> l) Environmental Control Procedure – 01/9/2018 m) Store Operating Manual – 2014 n) Jobs description - 2012	
<b>4.6.1.2</b>	All palm oil mills shall implement best practices. <b>- Major compliance -</b>	<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. GM Processing and the mill management team. In addition there are audits by OSH, Sustainability and Financial Audits. This is to ensure compliance to Policies, procedures in relation mill operations, financial, OSH, welfare among others being adhered.</p> <p>The mechanisms to check the implementation of procedures were made among others through;</p> <ul style="list-style-type: none"> <li>a) internal audit, safety and health meeting</li> <li>b) daily supervision and inspection by estates executives and mill engineers.</li> <li>c) Routine inspection (workplace inspection) by Assist Manager, staff and hospital assistant.</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		d) Inspection and advisory visits by Sustainability and Safety department from HQ/Regional Office	
<b>Criterion 4.6.2:</b> Economic and financial viability plan			
<b>4.6.2.1</b>	<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><b>- Major compliance -</b></p>	<p>The annual business plan is available. The document is in the form of annual budget and the projection for 5 years (Budget year 2017/18 / PY2 / PY3 / PY4 / PY5) prepared as guidance for future planning. The business plan contains FFB processed, production of CPO &amp; CPK. Component of operating expenditure includes</p> <ul style="list-style-type: none"> <li>a) FFB processed / CPO/CPK production</li> <li>b) General Charges               <ul style="list-style-type: none"> <li>- Supervision/Office &amp; admin expenses</li> <li>- Indirect labour</li> </ul> </li> <li>c) Processing</li> <li>d) Despatch</li> </ul> <p>The business plan comprises established for horizon 2020-2024.</p> <ul style="list-style-type: none"> <li>a) Crop intake.</li> <li>b) Processing cost RM/mt</li> <li>c) Extraction rates.</li> <li>d) CAPITAL expenditures.</li> </ul>	Complied

Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. <b>- Major compliance -</b>	Pricing mechanisms for the products and other services were clearly written in the contract and purchase order. For CPO and PK transporter, fees of services are mentioned under Third Schedule under the contract agreement. For supplier, specific terms and conditions are mentioned under notes and conditions on the transport and payment documentation. For FFB suppliers, there is a policy agreement that shows the price calculation formula which is signed by the buyer and the seller. Based on the formula, among the factors taken into consideration are OER, MPOB average price (for CPO & PK), MPOB cess, Sabah's CPO sales tax and processing fees to name a few.	Complied
<b>4.6.3.2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	Payments to the contractors were found to be fair, legal, transparent and timely manner in accordance to the established contract agreements. So far there has been no complaints with regards to payments. Further confirmation was also obtained during stakeholders' consultation. Sampled contractors for CPO & PK transport: <ul style="list-style-type: none"> <li>i) Chong Shu Ming Trading Sdn Bhd (validity 1/1/2018 to 31/12/2020)</li> <li>ii) Landasan Kembar Sdn Bhd (validity 1/1/2018 to 31/12/2020)</li> </ul> The payments for FFB suppliers were also found to be made in timely manner i.e. not later than the 12 <sup>th</sup> day of the subsequent month. Samples of payment vouchers are as follows: <u>Paid on 10/1/2020</u> #518540470100095	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		#518540470100093 #518540470100097  <u>Paid on 11/6/2020</u> #519802870100134 #519802870100130 #519802870100132	
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. <b>- Major compliance -</b>	Genting Tanjung POM had informed its contractors regarding the need to adhere the MSPO requirements. Awareness briefing was done the stakeholders including contractors on the MSPO requirements.	Complied
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	The contractors, for e.g. CPO & PK transporters (Landasan Kembar Sdn Bhd and Chong Shu Min Trading Sdn Bhd) have signed the contract agreement where the requirements of MSPO to be adhered stipulated in an addendum dated 30/1/2019.	Complied
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. <b>- Minor compliance -</b>	Stated in Clause 6 of the addendum mentioned in Indicator 4.6.4.2 above, which requires the contractors to provide cooperation and relevant access to the appointed CB into their operations, systems and any and all information.	Complied

**Appendix B: List of Stakeholders Contacted**

<p><b>Government Officer:</b>          Nil</p>	<p><b>Community/neighbouring village:</b>          Nil</p>
<p><b>Suppliers/Contractors/Vendors:</b>          KM Enterprise          Malbumi          Winking</p>	<p><b>Worker’s Representative/Gender Committee:</b>          Local and foreign workers          Gender representatives</p>

**Appendix C: Smallholder Member Details**

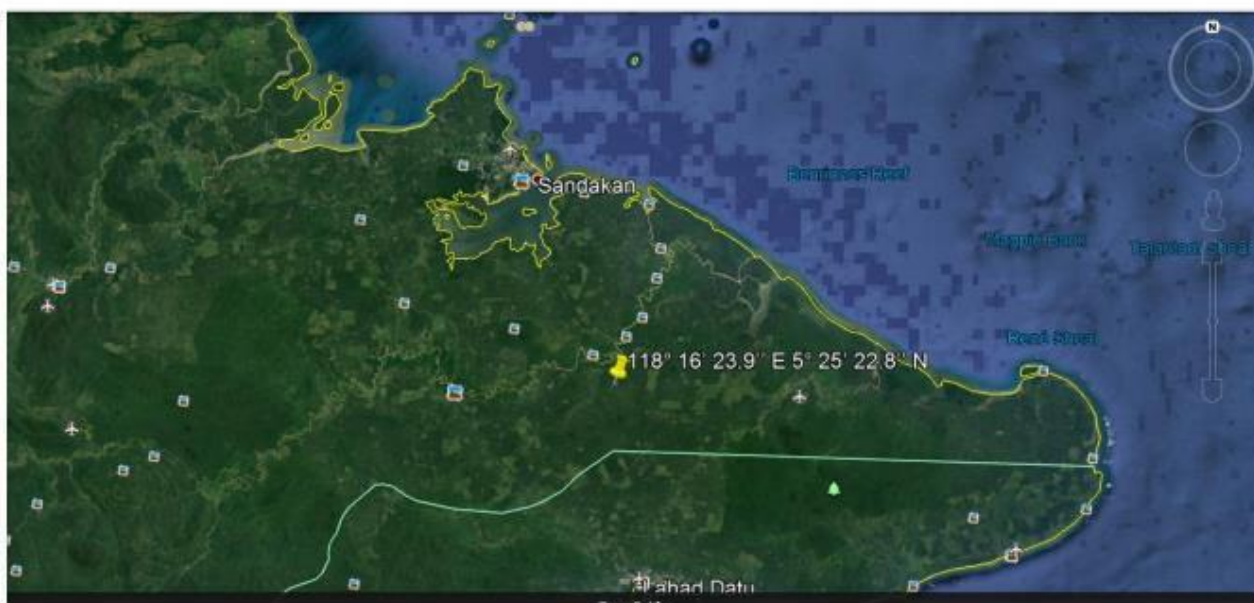
Not applicable

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



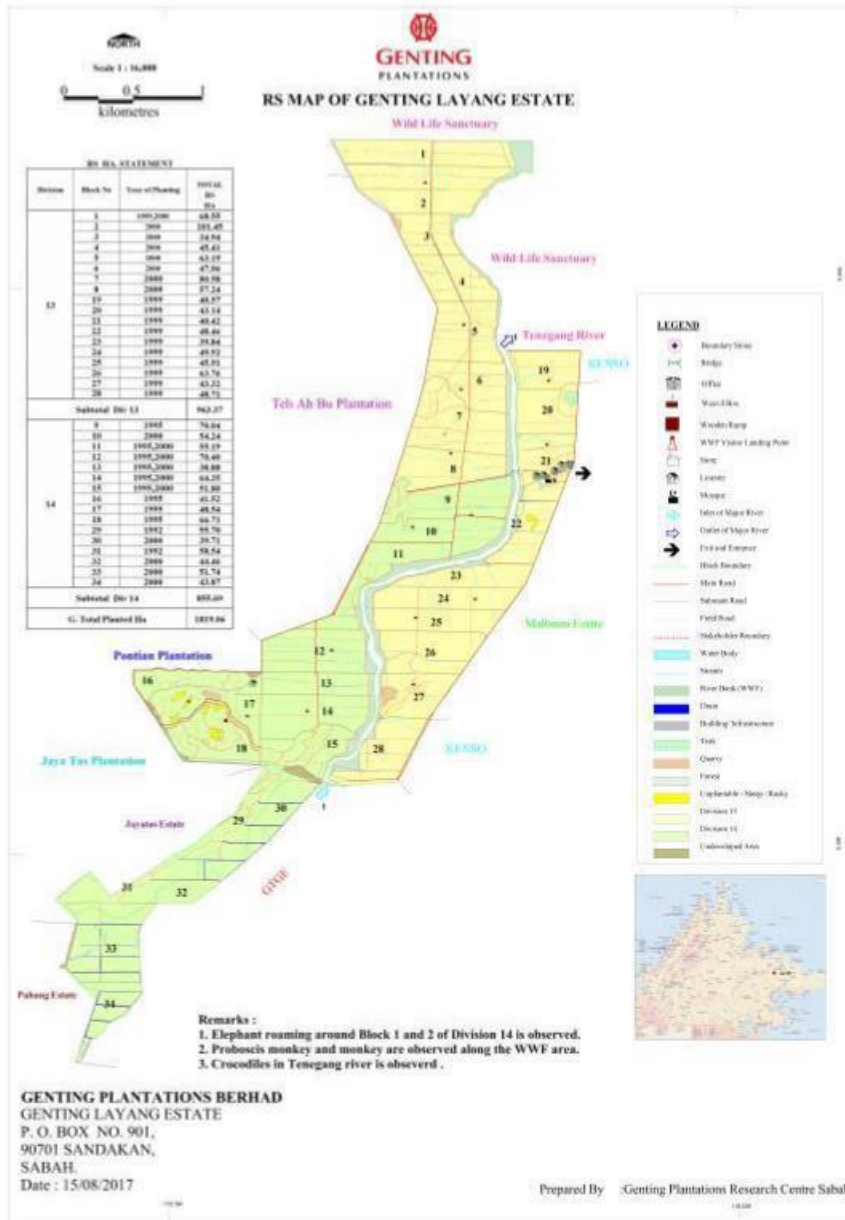
**Appendix D: Location and Field Map**

**Genting Tanjung Oil Mill**

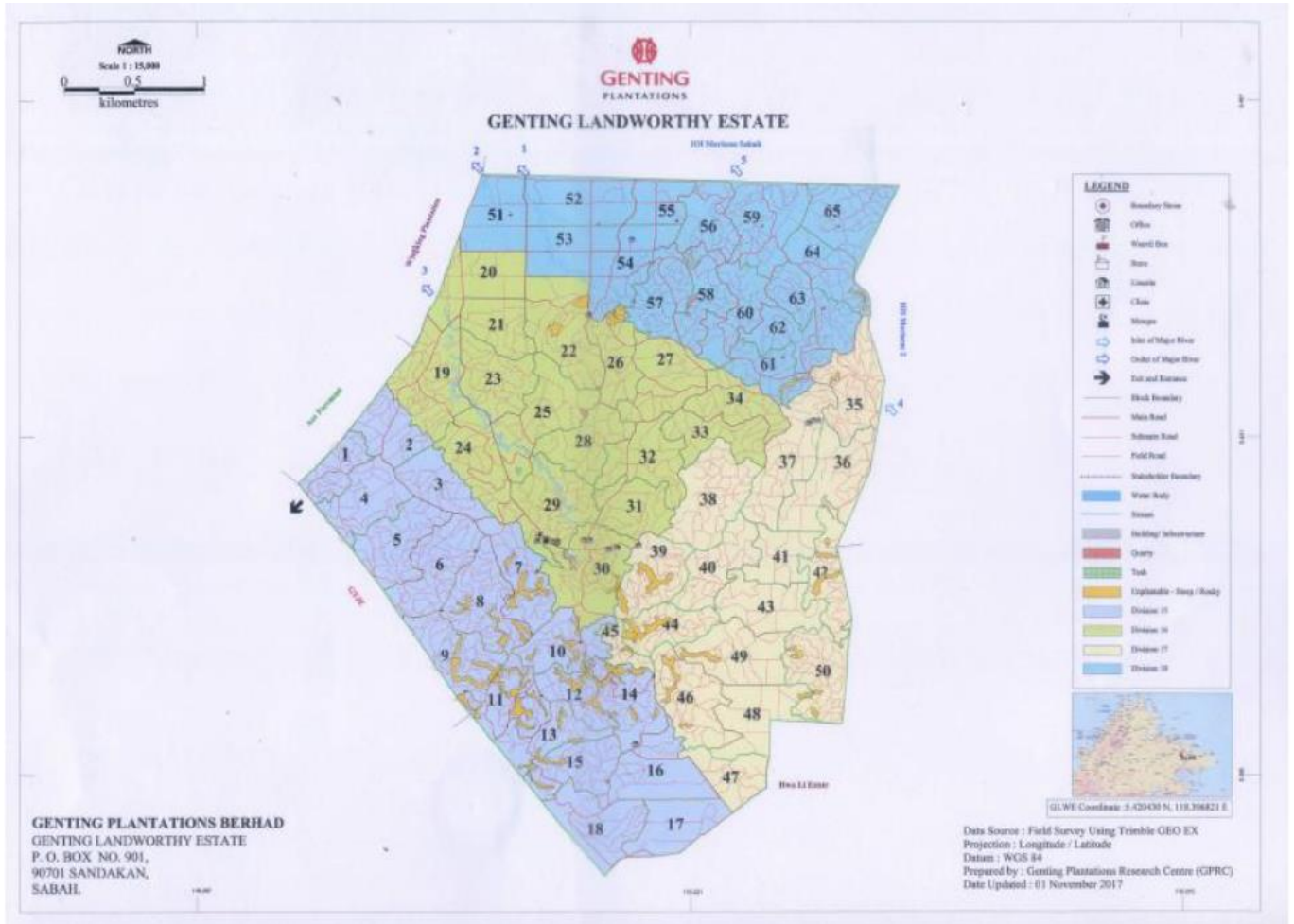




**Genting Layang Estate**



**Genting Landworthy Estate**



**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