

**MALAYSIAN SUSTAINABLE PALM OIL  
2<sup>nd</sup> ANNUAL SURVEILLANCE ASSESSMENT  
Public Summary Report**

<b>Genting Oil Mills (Sabah) Sdn Bhd</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 Sabapalm Oil Mill & Genting Sabapalm Estate  Location of Certification Unit: KM 25, Down Sg. Labuk, Mukim Tagas-Tagas 90000 Beluran, Sandakan Sabah, Malaysia

**Report prepared by:**  
**Hu Ning Shing** (Lead Auditor)

**Report Number: 3293248**

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

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## Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	Genting Oil Mills (Sabah) Sdn Bhd		
Mill/Estate	MPOB License No.	Expiry Date	
	Genting Sabapalm Oil Mill - 620051004000	20/08/2022	
	Genting Sabapalm Estate - 523495002000	30/09/2021	
Address	Genting Sabapalm Oil Mill, KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia		
Certification Unit	Genting Oil Mills (Sabah) Sdn Bhd - Genting Sabapalm Oil Mill		
Contact Person Name	Arunan a/l Kandasamy		
Website	<a href="https://www.gentingplantations.com">https://www.gentingplantations.com</a>	E-mail	Arunan.kandasmy@genting.com Gwendelynne.tanil@genting.com
Telephone	+603-2333 6510 +603- 7631 922	Facsimile	03 - 2333 6575

1.2 Certification Information			
Certificate Number	Mill: MSPO 689067 Plantations: MSPO 689068		
Issue Date	04/07/2019	Expiry date	03/07/2024
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Standard	MS 2530-3:2013 Part 3 and MS 2530-4:2013 Part 4		
Stage 1 Date	N/A (The certification unit is RSPO certified)		
Stage 2 / Initial Assessment Visit Date (IAV)	13 - 15/03/2019		
Continuous Assessment Visit Date (CAV) 1	09 - 10/07/2020		
Continuous Assessment Visit Date (CAV) 2	03 - 04/06/2021		
Continuous Assessment Visit Date (CAV) 3	N/A		
Continuous Assessment Visit Date (CAV) 4	N/A		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 653477	RSPO Principles & Criteria for Sustainable Palm Oil Production: 2013; Malaysian National Interpretation: 2014; RSPO Supply	BSI Services Malaysia Sdn Bhd	08/06/2021

	Chain Certification June 2017 for CPO Mills (Module D: Identity Preserved)		
MSPO 716641	MSPO Supply Chain Certification Standard	BSI Services Malaysia Sdn Bhd	07/10/2024
EU-ISCC-Cert-DE119-60213799	ISCC EU	ASG Cert GmbH	12/01/2022

### 1.3 Location of Certification Unit

Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Longitude	Latitude
Genting Sabapalm Oil Mill	KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia	117.37416	5.96508
Genting Sabapalm Estate	KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia	117.37416	5.96508

### 1.4 Certified Area

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Sabapalm Estate	3,954.23	8.91	395.44	4,358.58	90.72
<b>TOTAL</b>	<b>3,954.23</b>	<b>8.91</b>	<b>395.44</b>	<b>4,358.58</b>	

**Note:**

- 1) Planted ha reduce by 2.71 ha due to latest Ha survey done by GPRC for replanting area.
- 2) HCV have reduced to 8.91 ha from 17.39 ha is due to replanting area survey by GPRC. Adjustment of hectare was made at the riparian area since the planted hectare plus the previous riparian hectare doesn't tally. Similar explanation was made for RSPO last year.
- 3) Different of 11.17 ha on the infrastructure is due to new infrastructure such as new mill pond and new workshop site.
- 4) Actual title is 4,358.58 ha – last year 4,358.60 due to decimal error.

### 1.5 Plantings & Cycle

Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Sabapalm Estate	630.00	860.94	1,686.41	684.31	92.57	3,324.23	630.00
<b>Total (ha)</b>	<b>630.00</b>	<b>860.94</b>	<b>1,686.41</b>	<b>684.31</b>	<b>92.57</b>	<b>3,324.23</b>	<b>630.00</b>

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<b>1.6 Certified Tonnage of FFB</b>			
Estate	Tonnage / year		
	Estimated (Aug 20 - Jul 21)	Actual (Jul 20 - May 21)	Forecast (Aug 21 - Jul 22)
Genting Sabapalm Estate	93,240.00	77,419.21	115,471.00
<b>Total</b>	<b>93,240.00</b>	<b>77,419.21</b>	<b>115,471.00</b>

<b>1.7 Uncertified Tonnage of FFB</b>			
Estate	Tonnage / year		
	Estimated (Aug 20 - Jul 21)	Actual (Jul 20 - May 21)	Forecast (Aug 21 - Jul 22)
Smallholders	23,900.00	26,181.80	18,915.00
<b>Total</b>	<b>23,900.00</b>	<b>26,181.80</b>	<b>18,915.00</b>

<b>1.8 Certified Tonnage</b>			
Mill Capacity: 20 MT/hr  SCC Model: MB	Estimated (Aug 20 - Jul 21)	Actual (Jul 20 - May 21)	Forecast (Aug 21 - Jul 22)
	FFB	FFB	FFB
	93,240.00	77,419.21	115,471.00
	<b>CPO (OER: 21.86%)</b>	<b>CPO (OER: 21.65%)</b>	<b>CPO (OER: 21.71%)</b>
	20,382.00	16,761.17	25,072.00
	<b>PK (KER: 4.16 %)</b>	<b>PK (KER: 4.78%)</b>	<b>PK (KER: 4.19%)</b>
	3,876.00	3,702.21	4,844.00

<b>1.9 Actual Sold Volume (CPO)</b>					
CPO (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
16,761.17	-	9,435.25	-	2,228.98	11,664.23

<b>1.10 Actual Sold Volume (PK)</b>					
PK (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
3,702.21	-	-	2,496.97	736.20	3,233.17

## 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 fully remote assessment due to COVID-19 MCO restriction was conducted from 03 - 04/06/2021. The audit programme is included as Section 2.3. The approach to the audit was to treat the Genting Sabapalm Oil Mill and Estate as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included phone 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.

Phone calls 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 through phone calls. 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 years 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 Sabapalm Oil Mill	√	√	√	√	√
Genting Sabapalm Estate	√	√	√	√	√

**Tentative Date of Next Visit: June 1, 2022 - June 2, 2022**

**Total No. of Mandays: 6**

**2.1 BSI Assessment Team**

<b>Team Member Name</b>	<b>Role (Team Leader or Team member)</b>	<b>Qualifications (Short description of the team members)</b>
Hu Ning Shing	Team Leader	She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She attended Endorsed MSPO Auditor and MSPO SCCS Lead Auditor Course in 2019. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social, legal, workers & stakeholders consultation and SCC for CPO mill. She is fluent in Bahasa Malaysia and English languages.
Valence Shem	Team Member	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 and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. Able to communicate in Bahasa Malaysia and English.

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**2.2 Accompanying Persons**

No.	Name	Role
N/A		

**2.3 Assessment Plan**

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

Date	Time	Subjects	(HNS)	(VS)	ICT Planned
Thursday, 27/05/2021	1500 - 1530	Communication on document preparation - Audit plan - Any additional Information	√	√	Teleconference, Microsoft Team Meeting, Email
Thursday, 03/06/2021 Genting Sabapalm Oil Mill	0900 - 0915	Opening meeting • Opening presentation by audit team leader • Confirmation of assessment scope and finalize audit plan	√	√	Teleconference, Microsoft Team Meeting, Email
	0915 - 1030	Assessment and documentation review on mill best practice, legal requirements, OHS, environment and continual improvement		√	Teleconference, Microsoft Team Meeting, Email
	1030 - 1040	10-minute break		√	
	1040 - 1230	Assessment and documentation review on mill best practice, legal requirements, OHS, environment and continual improvement		√	Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch	√	√	
	1330 - 1450	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√		Teleconference, Microsoft Team Meeting, Email
	1450 - 1500	10-minute break	√		
	1500 - 1700	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√		Teleconference, Microsoft Team Meeting, Email
	1700 - 1730	Interim closing briefing	√	√	Teleconference, Microsoft Team Meeting, Email
	Friday, 04/06/2021 Genting Sabapalm Estate	0915 - 1030	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	
1030 - 1040		10-minute break	√		



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Date	Time	Subjects	(HNS)	(VS)	ICT Planned
	1040 - 1230	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√		Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch	√	√	
	1330 - 1450	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement		√	Teleconference, Microsoft Team Meeting, Email
	1450 -1500	10-minute break		√	
	1500 - 1600	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement		√	Teleconference, Microsoft Team Meeting, Email
	1600 - 1630	Assessment team discussion and preparation of closing meeting		√	Teleconference, Microsoft Team Meeting, Email
	1630 - 1700	Closing meeting	√	√	Teleconference, Microsoft Team Meeting, Email

### 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 three (3) Opportunity for Improvements raised.

Opportunity For Improvement		
<b>Ref:</b> 2064560-202106-I1	<b>Area/Process:</b> Genting Sabapalm Oil Mill	<b>Clause:</b> 4.4.5.6 – Part 4
Objective Evidence:	The mill to ensure the employment contract is filled with complete information such as start date and identification number/ passport number of the employees.	

Opportunity For Improvement		
<b>Ref:</b> 2064560-202106-I2	<b>Area/Process:</b> Genting Sabapalm Estate	<b>Clause:</b> 4.6.4.3 - Part 3
Objective Evidence:	The management to ensure that the Addendum to Memorandum of Agreement dated 13/07/2020 issued by Senior Vice President - Plantations (M) is fully implemented.	

Opportunity For Improvement		
<b>Ref:</b> 2064560-202106-I3	<b>Area/Process:</b> Genting Sabapalm Estate	<b>Clause:</b> 4.2.1.1 - Part 3
Objective Evidence:	The retrieval of some documents such as: - HIRARC and training records for FFB transportation by contractor - EIA report and compliance report for replanting - Documents related to SOCSO/insurance/wages/etc. payment for accident victim (e.g. Sarjan Suhaili) can be further improved.	

Noteworthy Positive Comments	
1	Good commitment from the management during the audit process.

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

<b>Major Nonconformities:</b>		
<b>Ref:</b> <b>1932021-202007-M1</b>	<b>Area/Process: Genting Sabapalm Estate</b>	<b>Clause: 4.2.2.3 – Part 3</b>
	<b>Issue Date: 10/07/2020</b>	<b>Due Date: 05/10/2020</b>
Requirements:	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.	
Statement of Nonconformity:	Stakeholder’s lists are incomplete and not updated.	
Objective Evidence:	1. Timbalan Pengarah Pegawai Imigresen, AG Mohd Yusof, who was named as the nominated representative of the Sandakan Immigration Office has retired, and this change has not been updated in the Stakeholder Lists. 2. GSPE employs 391 Indonesian and 2 Philippines workers. However, the Indonesian Consulate in Kota Kinabalu and the Philippines Embassy in Kuala Lumpur are not listed as stakeholders.	
Corrections:	To update the stakeholder list accordingly to include latest Timbalan Pengarah Pegawai Imigresen, Indonesian Consulate in Kota Kinabalu and the Philippines Embassy in Kuala Lumpur.	
Root cause analysis:	1. Changes on the Immigration Dept director was not inform by HR-GPOS to the OU’s, because OUs has no direct contact/deal with the Immigration Dept since any issue related to this department is handled by HRAD at GPOS. 2. The Indonesia Konsulat Jeneral in Kota Kinabalu and Philippines Embassy in Kuala Lumpur was not included in the GSOM and GSPE stakeholder list because Sustainability Department Sabah misunderstood that they are irrelevant since GSOM and GSPE have no direct contact with them.	
Corrective Actions:	OUs shall update and verify the stakeholder list at least once a year at least once a year and/or before the internal sustainability audit and external certification audits – as per Social Management Procedure SMP-GPB-32, clause 6.2  To update the social procedure to include the job responsibility of HR department to notify Operating unit of any changes.  Verification of closure of major NC, As per latest stakeholder list dated June 2020, already included the Consulate of Indonesia and Embassy of Philippine. The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment.	
Assessment Conclusion:	Verification during ASA2,  Stakeholder list for Genting Sabapalm Estate as at May 2021 was sighted. The stakeholders such as suppliers, contractors, neighbouring estates, local communities and government authorities were included into the list.  Phone called to authority such as police station, smallholder, representative of village and contractor confirmed that the contact person and contact number was correctly updated.  Thus, the major non-conformance remains closed.	

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<b>Major Nonconformities:</b>																																			
<b>Ref:</b> <b>1932021-202007-M2</b>	<b>Area/Process: Genting Sabapalm Estate</b>		<b>Clause: 4.4.5.3</b>																																
	<b>Issue Date: 10/07/2020</b>		<b>Due Date: 05/10/2020</b>																																
Requirements:	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.																																		
Statement of Nonconformity:	Workers' salary deductions were made without complying with the condition imposed by the Sabah Labour Office.																																		
Objective Evidence:	<p>Salary deductions for the following GSPE workers were made without complying with paragraph 2.2 of the Permit issued by the Sabah Labour Office dated 31 December 2019 (Serial No. 600-1/2/8/229 (11/SDK/2019-0339)). Paragraph 2.2. requires that a written consent from the workers to be obtained for the salary deductions. However, for the following workers, no written consent was obtained:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Estate Workers' No</th> <th style="text-align: left;">Month/ Year</th> <th style="text-align: left;">Travelling documents (RM)</th> <th style="text-align: left;">Electricity (RM)</th> </tr> </thead> <tbody> <tr> <td>E10936</td> <td>May 2020</td> <td>-</td> <td>8.35</td> </tr> <tr> <td>E00813</td> <td>May 2020</td> <td>-</td> <td>51.50</td> </tr> <tr> <td>E10155</td> <td>Jan 2020</td> <td>200</td> <td>-</td> </tr> <tr> <td>E00663</td> <td>May 2020</td> <td>-</td> <td>14.74</td> </tr> <tr> <td>E10847</td> <td>May 2020</td> <td>-</td> <td>10.98</td> </tr> <tr> <td>E00005</td> <td>May 2020</td> <td>-</td> <td>18.32</td> </tr> <tr> <td>E11276</td> <td>May 2020</td> <td>-</td> <td>50.00</td> </tr> </tbody> </table>			Estate Workers' No	Month/ Year	Travelling documents (RM)	Electricity (RM)	E10936	May 2020	-	8.35	E00813	May 2020	-	51.50	E10155	Jan 2020	200	-	E00663	May 2020	-	14.74	E10847	May 2020	-	10.98	E00005	May 2020	-	18.32	E11276	May 2020	-	50.00
Estate Workers' No	Month/ Year	Travelling documents (RM)	Electricity (RM)																																
E10936	May 2020	-	8.35																																
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E10155	Jan 2020	200	-																																
E00663	May 2020	-	14.74																																
E10847	May 2020	-	10.98																																
E00005	May 2020	-	18.32																																
E11276	May 2020	-	50.00																																
Corrections:	<p>Estate management was not aware of the syarat-syarat pematuhan permit pemotongan gaji as per stated in the both mention permits.</p> <p>There is no monitoring on the compliance of the syarat-syarat pematuhan as per permits requirement conducted by estate and mill management.</p>																																		
Root cause analysis:	<ol style="list-style-type: none"> <li>1. Immediately get written approval from all workers concerned for the deductions made as per permits requirements from the date of permits.</li> <li>2. To conduct training to estate and mill PIC on the Licence and permits compliance monitoring.</li> </ol>																																		
Corrective Actions:	<ol style="list-style-type: none"> <li>1. Standard workers consent letter will be attached together with the employment agreement, which will be briefed during the Induction Training before signed by the workers.</li> <li>2. To include the training on permits/licence compliance into the annual training programme to ensure continues training conducted.</li> </ol> <p>Verification of closure of major NC,            As per consent letter, the permit from JTK(600-1/2/8/229(11/SDK/2019-0339)) dated valid until 30/12/2021 and Training record on 25/8/2020 on permit and license, Thus the evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment.</p>																																		
Assessment Conclusion:	<p>Verification during ASA2,            Sampled two newly recruited workers on September 2020 found that they were signed on the consent letter prior to make any deduction of wages. The consent letter dated 22/02/2021 was sighted.</p>																																		

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	Thus, the major non-conformance remains closed.
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<b>Major Nonconformities:</b>		
<b>Ref:</b> <b>1932021-202007-M3</b>	<b>Area/Process: Genting Sabapalm Estate</b>	<b>Clause: 4.6.1.1 – Part 3</b>
	<b>Issue Date: 10/07/2020</b>	<b>Due Date: 05/10/2020</b>
Requirements:	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	
Statement of Nonconformity:	Standard Operating Procedures are not consistently implemented.	
Objective Evidence:	<p>1. Section 6.8.2 Procedure of Social Management (Doc. No. SMP-GPB-32, Rev. 00 dated 18 Jan 2018 states that Workers Committee Meetings shall be conducted at least quarterly or whenever necessary. However, records show that the Workers’ Committee Meetings at GSPE were held on 18 June 2019 and 14 Feb 2020.</p> <p>2. Clause 3 (ii) of SOP Revision 3 dated 11 October 2013 - Langkah-Langkah Perlu Dipatuhi di Kawasan Perumahan, Pusat Asuhan Kanak-Kanak dan Sekolah effective January 2011 states that all animal coups (“pondok binatang”) must be at least 50 metres away from the housing. At the linesite in Bangkawat Division and Kpg Bahagia 1, chicken coups were placed approximately 10m to 15m from the workers’ houses. In addition, housing inspection reports have identified the issue of chicken coups locations in weekly inspection reports dated 7 Feb 2020, 11 Feb 2020, 20 April 2020, 18 May 2020, 4 June 2020, 22 June 2020.</p> <p>3. Harvesters (Workers id: E11280, E11276 &amp; E11307) were not provided with safety shoes, verified as per interview and Issuance Record. This does not comply with Standard Operating Procedure (SOP) revision 3 dated 11 Oct 2013.</p>	
Corrections:	<p>1. GSPE and GSOM to prepare committee meeting schedule for the year 2020 and the schedule to be verified by Mill Manager and Estate Senior Manager. The Sustainability Department will conduct checking on the schedule compliance during monthly follow up visit. To conduct training on procedure to the estate PIC and sustainability coordinator. Checklist on the meeting schedule to be prepared and verified by the Estate Manager.</p> <p>2. Estate to carry out SOP briefing to the Bangkawat workers and any animal coups must be kept away from housing as per SOP. To ensure workers fully comply with the SOP requirements with the current shortage of staff and assistant, estate to conduct briefing on the SOP and workers to acknowledge the SOP requirements by signing a letter of consent of the action to be given if found not following the SOP requirements.</p> <p>3. To conduct training on the PPE issuance as per SOP requirements to the respective staff and assistant to improve knowledge and awareness regarding the SOP.</p>	
Root cause analysis:	<p>1. GSOM and GSPE workers Committee (JCC) frequency of meeting was not according to the Procedure of Social Management was due to there is no effective monitoring on the frequency being done by GSPE. Frequency of meeting for GSPE Workers Committee (JCC) was not following the procedure requirements due to the PIC was never read the procedure and there is no checking by estate sustainability coordinator.</p> <p>2. Enforcement of SOP clause 3(ii) was not consistently implemented by estate and HA weekly housing inspection report regarding the issue was not taken seriously by estate.</p>	

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	<p>The SOP clause 3(ii) and HA weekly housing inspection report regarding the chicken coops was not effectively implemented due to shortage of staff and increase work load in paper work.</p> <p>3. No monitoring on PPE issuance conducted by the divisional staff and assistant.</p>
Corrective Actions:	<p>1. GSOM and GSPE to schedule its committee meeting to be the same date with OSH Committee meeting. OSH committee meeting was conducted at least once in three month as per OSHA 1994 requirements.</p> <p>2. To erect signage's at the workers housing on the SOP Requirements.</p> <p>3. Divisional Assistant in-charge to conduct monthly checking checklist on PPE issuance and replacement and to be verified by estate manager.</p> <p>Verification of closure of major NC,          The evidence of the correction and corrective action as per below were adequate to close the NCR:-</p> <p>1. Estate committee meeting schedule 2020          2. SOP Briefing report to the workers and letter of consent.          3. PPE monthly checking checklist</p> <p>Effectiveness of the implementation shall be verified in the next assessment.</p>
Assessment Conclusion:	<p>Verification during ASA2,          Based on PPE issuance records, workers were provided with appropriate PPE. The records have the information about worker's name, type of PPE, date of issuance and acknowledgement of receipts. These records are checked by the Assistant Managers on monthly basis. There has been no recurrence of non-conformity. Thus, the major non-conformance remains closed.</p>

Major Nonconformities:		
<b>Ref:</b> <b>1932021-202007-M4</b>	<b>Area/Process:</b> <b>Genting Sabapalm Oil Mill</b>	<b>Clause:</b> <b>4.2.2.3 – Part 4</b>
	<b>Issue Date:</b> <b>10/07/2020</b>	<b>Due Date:</b> <b>05/10/2020</b>
Requirements:	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained.	
Statement of Nonconformity:	Stakeholders lists are incomplete and not updated.	
Objective Evidence:	<p>1. Timbalan Pengarah Pegawai Imigresen, AG Mohd Yusof, who was named as the nominated representative of the Sandakan Immigration Office has retired, and this change has not been updated in the Stakeholder Lists.</p> <p>2. GSOM employs 18 Indonesian workers. However, the Indonesian Consulate in Kota Kinabalu is not listed as stakeholders.</p>	
Corrections:	To update the stakeholder list accordingly to include latest Timbalan Pengarah Pegawai Imigresen, Indonesian Consulate in Kota Kinabalu	
Root cause analysis:	<p>1. Changes on the Immigration Dept director was not inform by HR-GPOS to the OU's, because OUs has no direct contact/deal with the Immigration Dept since any issue related to this department is handled by HRAD at GPOS.</p> <p>2. The Indonesia Konsulat Jeneral in Kota Kinabalu and Philippines Embassy in Kuala Lumpur was not included in the GSOM and GSPE stakeholder list because Sustainability Department Sabah misunderstood that they are irrelevant since GSOM and GSPE have no direct contact with them.</p>	

	<p>* HRAD – Human Resources &amp; Administration Dept * GPOS – Genting Plantations Office Sabah, Sandakan.</p>
Corrective Actions:	<p>OUs shall update and verify the stakeholder list at least once a year at least once a year and/or before the internal sustainability audit and external certification audits – as per Social Management Procedure SMP-GPB-32, clause 6.2</p> <p>To update the social procedure to include the job responsibility of HR department to notify Operating unit of any changes.</p> <p>Verification of closure of major NC, As per latest stakeholder list dated June 2020, already included the Consulate of Indonesia and updated. The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment.</p>
Assessment Conclusion:	<p>Verification during ASA2, The stakeholder list was last updated on March 2021 and all the stakeholders have been updated accordingly. Phone called to authority such as police station, smallholder, representative of village and contractor confirmed that the contact person and contact number was correctly updated. Thus, the major non-conformance remains closed.</p>

<b>Major Nonconformities:</b>																							
<b>Ref:</b> <b>1932021-202007-M5</b>	<b>Area/Process: Genting Sabapalm Oil Mill</b>	<b>Clause: 4.4.5.8 – Part 4</b>																					
	<b>Issue Date: 10/07/2020</b>	<b>Due Date: 05/10/2020</b>																					
Requirements:	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.																						
Statement of Nonconformity:	Workers’ overtime exceeding 104 hours were carried out without complying with the condition imposed by the Sabah Labour Office.																						
Objective Evidence:	<p>Paragraph 1.2 of the Permit issued by the Sabah Labour Office dated 18 May 2018 (Serial No. 600-1/2/13/9 (08/SDK/2018-0172) states that written consent from the worker is needed if they are required to do overtime exceeding 104 hours. However, overtime for the following GSOM workers were carried out without complying with the said condition:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Worker No</th> <th style="width: 33%;">Maximum hours per month</th> <th style="width: 33%;">Month/ Year</th> </tr> </thead> <tbody> <tr> <td>E00011</td> <td>106 hours</td> <td>March 2020</td> </tr> <tr> <td>E00027</td> <td>112.5 hours</td> <td>March 2020</td> </tr> <tr> <td>E00230</td> <td>118.5 hours</td> <td>March 2020</td> </tr> <tr> <td>E00286</td> <td>111.5 hours</td> <td>June 2020</td> </tr> <tr> <td>E00294</td> <td>104.5 hours</td> <td>Oct 2019</td> </tr> <tr> <td>E00309</td> <td>105 hours</td> <td>Oct 2019</td> </tr> </tbody> </table>		Worker No	Maximum hours per month	Month/ Year	E00011	106 hours	March 2020	E00027	112.5 hours	March 2020	E00230	118.5 hours	March 2020	E00286	111.5 hours	June 2020	E00294	104.5 hours	Oct 2019	E00309	105 hours	Oct 2019
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E00294	104.5 hours	Oct 2019																					
E00309	105 hours	Oct 2019																					
Corrections:	<p>1. Immediately get written approval from all workers concerned for overtime exceeding 104 hour from their date of employment, until end of employment. To get all workers consent for the overtime exceeding 104 hours from the date of the permits.</p> <p>2. To conduct training to estate and mill PIC on the Licence and permits compliance monitoring.</p>																						

Root cause analysis:	<p>Mill management was not aware of the syarat-syarat pematuhan permit pemotongan gaji and kerja lebih masa as per stated in the both mention permits.</p> <p>There is no monitoring on the compliance of the syarat-syarat pematuhan as per permits requirement conducted by the mill management.</p>
Corrective Actions:	<p>1. Standard workers consent letter will be attached together with the employment agreement, which will be briefed during the Induction Training before signed by the workers.</p> <p>2. To include the training on permits/licence compliance into the annual training programme to ensure continues training conducted.</p> <p>Verification of closure of major NC, Verification on training record dated 10/7/2020 on Permit and license also briefing on Overtime more than 104 hours. The evidence of the correction and corrective action were adequate to close the NCR. Effectiveness of the implementation shall be verified in the next assessment.</p>
Assessment Conclusion:	<p>Verification during ASA2, Reviewed the payslips and punch card for September 2020 (highest production month), December 2020 and May 2021 found that no overtime has exceeded 104 hours.</p> <p>Thus, the major non-conformance remains closed.</p>

Major Nonconformities:		
<b>Ref:</b> <b>1932021-202007-M6</b>	<b>Area/Process: Genting Sabapalm Oil Mill</b>	<b>Clause: 4.6.1.1– Part 4</b>
	<b>Issue Date: 10/07/2020</b>	<b>Due Date: 05/10/2020</b>
Requirements:	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	
Statement of Nonconformity:	Standard Operating Procedures are not consistently implemented.	
Objective Evidence:	<p>1. Section 6.8.2 Procedure of Social Management (Doc. No. SMP-GPB-32, Rev. 00) dated 18 Jan 2018 states that Workers Committee Meetings shall be conducted at least quarterly or whenever necessary. However, records show that the Workers' Committee Meetings at GSOM were held on 6 March 2020 and 8 Oct 2019.</p> <p>2. No health declaration was conducted before entering confined space as verified from PTW dated 4/5/2019 and 2/5/2019. This was not followed as per Safe Operating Procedure for Confined space (GSOM-SOP-MGR-03) dated 3 Jan 2010. Last health declaration conducted was on 2017.</p>	
Corrections:	<p>1. GSOM to prepare committee meeting schedule for the year 2020 and the schedule to be verified by Mill manager. The Sustainability Department will conduct checking on the schedule compliance during monthly follow up visit. To conduct training on procedure to the estate PIC and sustainability coordinator. Checklist on the meeting schedule to be prepared and verified by the Estate Manager.</p> <p>2. i) Amend SOP for Confined space (GSOM-SOP-MGR-03) ii) Conduct training to all workers on revised SOP for Confined space. iii) Health declaration form shall be attached with the PTW as a complete set Health declaration must be made prior to working in confine space area.</p>	



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	iv) In October 2020, Person in-charge will be attended NIOSH course for Confined Space competent person i.e. Authorized Gas Tester, Entry Supervisor, Authorized Entry and Standby Person.
Root cause analysis:	1. GSOM workers Committee (JCC) frequency of meeting was not according to the Procedure of Social Management was due to there is no effective monitoring on the frequency being done by GSOM. Frequency of meeting for GSPE Workers Committee (JCC) was not following the procedure requirements due to the PIC was never read the procedure and there is no checking by estate sustainability coordinator. 2. No proper checking by the manger / engineer and health declaration does not stated in Safe Operating Procedure for Confined space (GSOM-SOP-MGR-03).
Corrective Actions:	1. GSOM to schedule its committee meeting to be the same date with OSH Committee meeting. OSH committee meeting was conducted at least once in three month as per OSHA 1994 requirements. 2. i) In October 2020, Person in-charge will be attended NIOSH course for Confined Space competent person i.e. Authorized Gas Tester, Entry Supervisor, Authorized Entry and Standby Person. Health Declaration form must be prepared for all confine space work by engineer and verified by mill manager. The health declaration must be checked by SHO during safety visit.  Verification of closure of major NC, The evidence of the correction and corrective action as per below were adequate to close the NCR:- 1. Estate committee meeting schedule 2020 2. SOP (GSOM-SOP-MGR-03) dated 20/7/2020 amended 3. Training on new amended SOP (GSOM-SOP-MGR-03) dated 27/7/2020 4. Updated PPE checklist 5. Health Declaration Record 2020. Effectiveness of the implementation shall be verified in the next assessment.
Assessment Conclusion:	Verification during ASA2, Minutes of meetings were available confirming that quarterly OSH meetings had been held at the GSOM. Ref.: OHS meeting minutes (GSOM)– #24/07/2020, 17/10/2020, 15/12/2020, 31/03/2021. All the appropriate records for working in confined space such as health declaration and training on confined space were also available for verification. There has been no recurrence of non-conformity. Thus, the major non-conformance remains closed.

Opportunity for Improvement:		
<b>Ref:</b> <b>1932021-202007-I1</b>	<b>Area/Process:</b> <b>Genting Sabapalm Oil Mill</b>	<b>Clause:</b> <b>4.3.1.1 – Part 4</b>
Objective Evidence:	To ensure all workers that expose to noise (85-89dB or >90dB) are send for audiometric test as per recommendation (Report On Positive Initial Employee Noise Exposure Monitoring With Additional Areas dated 9 Oct 2012)	
Assessment Conclusion:	Verification during ASA2,	

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	<p>The latest Noise Risk Assessment was conducted on 15-16/04/2021 [ref.: SSS/NOISE-301/21]. The assessor has recommended to carry out annual audiometric testing for those exceeding limits specified in regulation. The mill has planned to send all the relevant employees for audiometric test in the third quarter of this year. Thus, the OFI was closed on 04/06/2021.</p>
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**3.4 Summary of the Nonconformities and Status**

CAR Ref.	CLASS	ISSUED	STATUS
1750088-201903-M1	Major	15/03/2019	Closed on 21/05/2019
1750088-201903-M2	Major	15/03/2019	Closed on 21/05/2019
1750088-201903-M3	Major	15/03/2019	Closed on 21/05/2019
1750088-201903-M4	Major	15/03/2019	Closed on 21/05/2019
1750088-201903-N1	Minor	15/03/2019	Closed on 10/07/2020
1750088-201903-N2	Minor	15/03/2019	Closed on 10/07/2020
1750088-201903-N3	Minor	15/03/2019	Closed on 10/07/2020
1750088-201903-N4	Minor	15/03/2019	Closed on 10/07/2020
1932021-202007-M1	Major	10/07/2020	Closed on 05/10/2020
1932021-202007-M2	Major	10/07/2020	Closed on 05/10/2020
1932021-202007-M3	Major	10/07/2020	Closed on 05/10/2020
1932021-202007-M4	Major	10/07/2020	Closed on 05/10/2020
1932021-202007-M5	Major	10/07/2020	Closed on 05/10/2020
1932021-202007-M6	Major	10/07/2020	Closed on 05/10/2020




**3.5 Issues Raised by Stakeholders**

IS #	Description
1	<p><b>Feedbacks:</b>                      Smallholder &amp; Representative of Kg. Tagas-tagas – He was supplying FFB to the mill and payment was made promptly. He also understood the pricing mechanism and complaint procedure of the company. No encroachment of land by Genting Plantations Berhad. Trenches were available to demarcate the boundary. The management has provided assistance such as road grading on the road access to the village. So far, he has good relationship with the management.</p>
	<p><b>Management Responses:</b>                      The management will continue to maintain good relationship with the stakeholders.</p>
	<p><b>Audit Team Findings:</b>                      No further issues.</p>
2	<p><b>Feedbacks:</b>                      Contractor – He informed that he has signed on agreement prior to provide services to the company. He understood the terms and conditions stated in the agreement and there was no issue on the payment. He understood the complaint procedure and he has been briefed on MSPO requirements accordingly.</p>

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	<p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No further issue.</p>
3	<p><b>Feedbacks:</b> Officer, Tagas-tagas Police Station – He informed that the management has provided varieties of assistance to the authority such as supplied water and provided grass cutting machine for them to carry out the grass cutting activity. All these were provided with free of charge. He informed that there was no any legal or social issue reported to Genting Sabapalm Oil Mill and estate at this moment.</p> <p><b>Management Responses:</b> The management will provide assistance whenever needed.</p> <p><b>Audit Team Findings:</b> No other issue.</p>
4	<p><b>Feedbacks:</b> Workers – They informed that their wages are paid according to Minimum Wage Order 2020. They are aware of the complaint procedure and they informed that they do not have any complaint at this moment. There was no discrimination report and the management treated everyone equally. Overtime was based on voluntarily basis. The female worker informed that there was no sexual harassment and violence case report.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No further issue.</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 Sabapalm Oil Mill and Estate Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Genting Sabapalm Oil Mill and Estate Certification Unit is approved and/or continued.	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<p><b>Signed for on behalf of</b>  <b>Genting Plantations Berhad</b></p>  <hr/> <p>Name: Arunan Kandasamy            Title: SVP – Plantation (Malaysia)            Date: 18/06/2021</p>  <hr/> <p>Name: Choo Huan Boon            Title: SVP – Processing (Malaysia) and Downstream Manufacturing            Date: 18/06/2021</p>	<p><b>Name:</b>            Hu Ning Shing</p> <p><b>Company name:</b>            BSI Services Malaysia Sdn Bhd</p> <p><b>Title:</b>            Lead Auditor</p> <p><b>Signature:</b></p>  <p><b>Date: 14/06/2021</b></p>

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

**MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm 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 developed Malaysian Sustainable Palm Oil (MSPO) Policy, version dated 18/03/2014 signed by President & Chief Operating Officer, Mr. Yong Chee Kong. The company ensure compliance with MSPO and the MPOB Code of Practice requirements.  Briefing of the policy was conducted on 26/02/2021 and 06/04/2021 to the workers during morning muster. Seen the training attendance list.	Yes
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. <b>- Major compliance -</b>	In the policy above, the company also committed to continue to assess and develop new and innovative techniques, approaches and practices with the objective of continuous improvement in the journey towards achieving sustainable palm oil.	Yes
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	Internal audit plan was established to carry internal audit for MSPO Part 3 and RSPO P&C in the estate. The date of audit was planned on 29-30/03/2021 conducted by Mr. Ronlie and Mr. Sharul. Seen the RSPO/ MSPO Internal Audit Report where total 3 opportunity for	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		improvement were raised. Action plan, person-in-charge, timeline and status of the observation was developed and updated.	
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.  - <b>Major compliance</b> -	Genting Plantations Berhad has developed Sustainability Internal Audit procedure with Doc. No.: SMP-GPB-03, Rev. 02 dated 27/03/2018 to plan and implement internal audits to determine conformance to the applicable sustainability standards' requirements such as RSPO, MSPO and ISCC. The frequency of the audit is not less than once a year.  The last internal audit was carried out on 29/03/2021 with total 15 observations were raised and recorded in the internal audit report. No non-conformity was raised during the audit.	Yes
<b>4.1.2.3</b>	Report shall be made available to the management for their review.  - <b>Major compliance</b> -	The Senior Manager of the Estate, Mr. Tan Yeong Huat has reviewed the Internal Audit Report Summary and acknowledged on 30/03/2021.	Yes
<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> -	RSPO & MSPO Part 3 & 4 Management Review meeting was conducted on 10/04/2021 for both Genting Sabapalm Oil Mill and Genting Sabapalm Estate. The meeting was chaired by Senior Estate Manager and attended by relevant personnel from both mill and estate. Meeting minutes was available.	Yes

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. <b>- Major compliance -</b>	The action plan for continual improvement with regards to social and environment impacts, and opportunities were available in the estate in various forms such as social action plan, environmental management plan, and water management plan to name a few. The plans have the information about the possible issues, action to be taken, person in charge, time frame and status of action.	Yes
<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 standards and technology (where applicable) that are available and feasible for adoption. <b>- Major compliance -</b>	The estate continuously ensures there are improvement practices in line with new information and techniques introduced in the workforce. Since the last assessment, there was no opportunity for the estate to adopt new technology in its operation.	Yes
<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>	NA as no new technology adopted.	Yes
<b>4.2 Principle 2: Transparency</b>			
<b>Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements</b>			
<b>4.2.1.1</b>	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and	Genting Plantations Berhad has developed Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated	OFI

Criterion / Indicator	Assessment Findings	Compliance
<p>forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.</p> <p><b>- Major compliance -</b></p>	<p>23/02/2018 for the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties. Meeting shall be carried out at least six monthly and annually for internal and external stakeholders. The topics to be discussed such as complaint &amp; grievances, environmental and biodiversity concerns, social issue and suggestions for improvement. The procedure has been briefed to the internal and external stakeholders. Briefing of the policy was conducted on 26/02/2021 and 06/04/2021 to the workers during morning muster. Seen the training attendance list.</p> <p>Stakeholder meeting was unable to conduct and the management has taken initiative to brief the stakeholders via WhatsApp. The circular was sent to the affected stakeholders such as local communities, neighbouring estate, schools' representatives and local authorities. There was no issue receive from the stakeholders through WhatsApp.</p> <p><i>The retrieval of some documents such as:</i></p> <ul style="list-style-type: none"> <li>- HIRARC and training records for FFB transportation by contractor</li> <li>- EIA report and compliance report for replanting</li> <li>- Documents related to SOCSO/insurance/wages/etc. payment for accident victim (e.g. Sarjan Suhaili)</li> </ul> <p><i>can be further improved.</i></p> <p><i>Thus, an OFI was raised.</i></p>	
<p><b>4.2.1.2</b> Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p>	<p>Genting Sabapalm Estate has issued the list of documents that could be requested by the stakeholders to all the relevant stakeholders of the mill. The stakeholders are required to register in Enquiry Register Book prior to access to the documents. The list of documents not limited to:</p> <ul style="list-style-type: none"> <li>• Land title</li> </ul>	<p>Yes</p>



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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<ul style="list-style-type: none"> <li>• Policies</li> <li>• Reports – EAI, SIA, HCV and audit reports</li> <li>• Management plans</li> <li>• Procedures</li> </ul>	
<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>- Major compliance -</p>	<p>Genting Plantations Berhad has developed Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 23/02/2018 for the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties. Meeting shall be carried out at least six monthly and annually for internal and external stakeholders. The topics to be discussed such as complaint &amp; grievances, environmental and biodiversity concerns, social issue and suggestions for improvement.</p>	Yes
<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>- Minor compliance -</p>	<p>Senior Manager of the Estate has been appointed by Vice President - Plantation to be the management representative for ISCC, RSPO and MSPO related matters. Appointment letter dated 12/04/2021 was sighted.</p>	Yes
<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>- Major compliance -</p>	<p>Stakeholder list for Genting Sabapalm Estate as at May 2021 was sighted. The stakeholders such as suppliers, contractors, neighbouring estates, local communities and government authorities were included into the list.</p> <p>Stakeholder meeting was unable to conduct and the management has taken initiative to brief the stakeholders via WhatsApp. The circular was sent to the affected stakeholders such as local communities,</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		neighbouring estate, schools' representatives and local authorities. There was no issue receive from the stakeholders through WhatsApp.	
<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 [Sustainability Management Procedure Manual (SMPM)], Traceability (Estate) [SMP-GPB-09, rev. 05, Oct 2020].	Yes
<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 written together with other schemes audit such as RSPO and ISCC, was available for verification (see Criterion 4.1.2 for details).	Yes
<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>	GPB has defined the roles and responsibilities for the implementation and maintenance of its traceability system in the Traceability (Estate) procedure. Among the positions identified are: <ul style="list-style-type: none"> <li>• Harvesters &amp; loaders</li> <li>• Lorry/tractor driver</li> <li>• Weighbridge operator (if any)</li> <li>• Dispatch staff or dispatch clerk</li> <li>• Assistant Manager/Estate Manager</li> <li>• Sustainability Dept.</li> </ul>	Yes
<b>4.2.3.4</b>	Records of sales, delivery or transportation of FFB 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>• Estate's FFB dispatch advice</li> <li>• Weighbridge ticket</li> </ul>	Yes

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		<p>Based on the estate’s crop production records, the following information was obtained:</p> <p>Period: Jul 2020 – May 2021</p> <p>MSPO/RSPO certified FFB sent to GSOM = 77,419.21 MT</p>	
<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 estate has obtained approval from <i>Jabatan Tenaga Kerja Sabah</i> for the following:</p> <ul style="list-style-type: none"> <li>i. S/N: 600-1/2/8/229 (11/SDK/2019-0339) for deduction of wages for travel document, travel document for dependent, medical cost and electricity which valid until 30/12/2021.</li> </ul> <p>GSPE monitored compliance with applicable local, state, national and ratified international laws and regulations through evaluation of compliance. The last evaluation of compliance was done in May 2021 covering the performance period of Jan-Apr 2021. Among the evidence of legal compliance verified were as follows:</p> <ul style="list-style-type: none"> <li>i. Trading license #A410367, issued by MPS, valid until 31/12/2021</li> <li>ii. MPOB License #523495002000, valid until 30/09/2021</li> <li>iii. Energy Commission’s <i>Lesen Pemasangan Persendirian</i> #2021/00807, valid until 28/04/2022</li> </ul>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		iv. Certificate of fitness of air compressor, #PMT-SB/2139204, valid until 07/05/2022	
<b>4.3.1.2</b>	The management shall list all laws applicable to their operations in a legal requirements register. <b>- Major compliance -</b>	All related legal requirements had been documented in "Master List of Legal Requirements & Best Practices Applicable to Plantation Operations in Malaysia". It was last updated on 08/09/2020.	Yes
<b>4.3.1.3</b>	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. <b>- Major compliance -</b>	Addressed in Legal Requirement Register [Ref.: doc no. SMP-GPB-22 rev. 08 dated March 2020]. The process of law changes as follows: <ul style="list-style-type: none"> <li>i. Notification of changes from various source of information i.e. Lawnet, government gazette and sustainability team based in the Sandakan HQ.</li> <li>ii. Monitoring for changes in the Law</li> <li>iii. Clarification and review on the changes</li> <li>iv. Updating of the Legal register administered internally</li> <li>v. Notification to the operating units and/or the relevant person in charge</li> </ul> The established legal register has incorporated the latest changes of law.	Yes
<b>4.3.1.4</b>	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. <b>- Minor compliance -</b>	Mdm Helena Bulukun had been assigned as the PIC for monitoring compliance and updating changes in law [ref.: appointment letter dated 01/01/2021]. Checking of status compliance was regularly done through the utilisation of form no. SMP-GPB-22. The latest period under review was Jan-Apr2021.	Yes

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. <b>- Major compliance -</b>	The was no evidence to show that oil palm cultivation activities Genting Sabapalm Estate had diminished the land use rights of others. Verified documents to show legal ownership of its land by Genting Plantations Berhad.	Yes
<b>4.3.2.2</b>	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. <b>- Major compliance -</b>	Verified the land titles shown that the legal ownership of the company. Sample of land title as below: <ul style="list-style-type: none"> <li>i. Country Lease No.: 085319231</li> <li>ii. Lease No.: 085109977</li> <li>iii. Lease No.: 085109968</li> </ul>	Yes
<b>4.3.2.3</b>	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. <b>- Major compliance -</b>	The legal boundary for estate visited was clearly demarcated by constructing the “red-white pole”. Seen the photo evident of the pole to demarcate the boundary.	Yes
<b>4.3.2.4</b>	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). <b>- Minor compliance -</b>	There is no land dispute in the Genting Sabapalm Estate at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified. This has been verified through phone interviewed with the local community.	Yes
<b>Criterion 4.3.3 – Customary rights</b>			

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4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - <b>Major compliance</b> -	There is no customary land or negotiated agreements within the Genting Sabapalm Estate's land area.	Yes
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> -	The right to use the land is not disputed and there was no customary land within the Genting Sabapalm Estate.	Yes
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - <b>Major compliance</b> -	There is no land dispute or customary rights issues in the estate.	Yes
<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> -	Social Impact Assessment (SIA) & Human Rights Impact Assessment (HRIM) Report was reviewed on March 2021 for both Genting Sabapalm Oil Mill and Genting Sabapalm Estate by Sustainability Department. The assessment has involved relevant stakeholders such as schools' representatives, local authorities, contractors, transporters and workers. No negative impact was identified during the assessment through interviewed. Social Management and Monitoring Plan of Genting Sabapalm Estate was reviewed and last updated on 10/04/2021.	Yes
<b>Criterion 4.4.2: Complaints and grievances</b>			

Criterion / Indicator		Assessment Findings	Compliance
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has established Complaints and Grievances procedure with Doc. No.: SMP-GPB-19, Rev. 04 dated March 2020 to provide guidelines on handling complaints &amp; grievances involved internal and external stakeholders. All the written confidential complaints shall be dealt by Manager. The timeframe for the action to be taken depends on seriousness of the complaints or grievance. The accepted timeframe to acknowledge and respond to the complaint or grievances is within 1 month upon receipt.</p>	Yes
4.4.2.2	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p><b>- Major compliance -</b></p>	<p>The estate has implemented Complaints/ Grievances Record Book to record any complaint or grievance received. Sampled of the records of complaint as below:</p> <ol style="list-style-type: none"> <li> <p>Ref No.: 045 dated 08/03/2021            Issue: Rupture door, ceiling and wall caused by termites.            Action: The management has sent carpenter to check and repair on 18/03/2021.            Status: Seen the photo evidence of repair work completed and the complainant has acknowledged after the action has been taken on 18/03/2021.</p> </li> <li> <p>Ref No.: 049 dated 19/02/2021            Issue: Broke windows            Action: The management send the carpenter to replace.            Status: Seen the photo evidence of repair work completed and the complainant has acknowledged after the action has been taken on 19/02/2021.</p> </li> </ol>	Yes

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4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. <b>- Minor compliance -</b>	The complaint form was available in the office of mill, estate and the sundry shop around the compound. Besides, the stakeholders can lodge any complaint via WhatsApp as well. Seen the WhatsApp communication regarding this to the stakeholders.	Yes
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>	The external stakeholders were briefed on the complaint procedure via WhatsApp group message. Seen the screenshot of the messages and phone interviewed with the stakeholder confirmed that they are aware of the complaint procedure.	Yes
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>	Records of complaint or grievance for February 2019 was available for review during the time of audit.	Yes
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. <b>- Minor compliance -</b>	Genting Sabapalm Estate has carried out corporate social responsibilities to the local communities such as hire of backhoe to load stockpile for road patching at the Kg Tagas-tagas road, repair the Tagas's Police station and grass cutting, supplied treated water to the police station and etc. Seen the total expenditure of the CSR been contributed. Phone interviewed with the authority and local community confirmed that the management has contributed to the local communities upon request. Photo evidence of the repair road was sighted.	Yes



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<b>Criterion 4.4.4:</b> Employees safety and health			
<b>4.4.4.1</b>	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.  - <b>Major compliance</b> -	The Occupational Safety and Health Policy had been established, signed by President & Chief Operating Officer on 1st July 2018. The policy was communicated to the employees through various methods such as training, morning muster, display on notice boards to name a few.	Yes
<b>4.4.4.2</b>	The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety	a) The Occupational Safety and Health Policy had been established, signed by President & Chief Operating Officer on 1st July 2018. The policy was communicated to the employees through various methods such as training, morning muster, display on notice boards to name a few. b) SOP for HIRARC (SP-MGR-01) was made available. The technique was described accordingly in the SOP. The HIRARC was reviewed on 25/01/2019. The last CHRA was conducted in October 2019. The report [#JKKP HQ/07/ASS/00/236-2019/158] was available for verification. c) Training matrix and training programme were established by the management. Evidence of adequate and appropriate training on safe working practices provided to workers was sighted, for example: SOP Training-Sprayer & Storekeeper (17/03/2021), Chemical Spillage training (20/03/2021). d) Issuance of PPE to employees is recorded in a standard form which has the information about name of employee, type of PPE, workstation, date of issuance and acknowledgment of receipt. e) SOP for handling chemical management was addressed in a few procedures such as SOP for spraying and Highly Toxic Pesticides	Yes

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<p>Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>procedure. The procedure outlines the handling of chemicals in accordance to the regulation.</p> <p>f) SHC Organization – Chairman: Estate Manager, SHC secretary: Assistant Manager. Organization chart of OSH committee was available</p> <p>g) Records were available confirming that quarterly OSH meetings had been held at the GPSE. Ref.: OHS meeting minutes (GPSE) – #24/07/2020, 26/08/2020, 24/02/2021, 18/05/2021</p> <p>h) The handling of accident and emergency are addressed in “Pemberitahuan dan Penyiasatan Kemalangan di Tempat Kerja” procedure.</p> <p>i) There are 32 units of first aid kit provided at various workstations at the estate such as workshop, harvesting gangs, maintenance gangs and office.</p> <p>All accidents are to be investigated and reported to Head Office. Since the last assessment, there has been one accident case that involved more than 4 lost day. The management has taken necessary action in term of reporting to the authority and compensation claim.</p>	<p></p>	
<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	Genting Plantations Berhad has established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company respect human rights and support international human rights	Yes

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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>law. Briefing of the policy was conducted on 26/02/2021 and 06/04/2021 to the workers during morning muster. Seen the training attendance list.</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>Genting Plantations Berhad has established Social Policy dated 14/09/2020 signed by President &amp; Chief Operating Officer. The company shall not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.</p>	Yes
<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>There were employment contracts for staffs and workers. Pay and conditions are documented and achieved the Minimum Wage Order 2020. Sampled of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Employment Act 1955 which have been signed by the worker. Sampled of total 20 payslips for September 2020, December 2020, April 2021 and May 2021 found that all the workers were paid accordingly.</p>	Yes
<b>4.4.5.4</b>	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p><b>- Minor compliance -</b></p>	<p>There were two FFB transporters engaged by the estate. Reviewed total 8 payslips of the contractors' workers found that they were paid according to Minimum Wage Order 2020. SOSCO contribution was made accordingly. Employment contracts were signed by the workers prior to work. All terms and conditions were clearly stated in the employment contract.</p>	Yes
<b>4.4.5.5</b>	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records</p>	<p>The estate has established a List of Labour Master where record of full name, employee no., date joined, gender, date of birth and type of work were clearly stated in the list.</p>	Yes

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	<p>should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p><b>- Major compliance -</b></p>		
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>All the workers are employed under direct employment. 8 employment contracts were sampled and found that terms and conditions of the employment were clearly stated in the contract and signed by the workers.</p>	Yes
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p><b>- Major compliance -</b></p>	<p>The estate management monitor the attendance and working time through checkroll book. Overtimes will be recorded in Workers Request Overtime form which is transparent to workers and the number of overtimes will be shown in the payslips.</p>	Yes
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>Interviewed with the workers confirmed that they have rest time in between of the working hours. Overtimes were paid according to the rate stated in the agreement and regulatory requirements. The overtime offered upon mutually agreement. Overtimes will be recorded in Workers Request Overtime form.</p>	Yes
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p><b>- Major compliance -</b></p>	<p>Wages and overtime were paid according to Sabah Ordinance and punch card of the workers. Total hours of overtime and daily attendance has recorded in the LMD system and the payslips. Refer to indicator 4.4.5.3.</p>	Yes

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<b>4.4.5.10</b>	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.  - <b>Minor compliance</b> -	All the workers are provided with free medical facilities. Free housing facilities were provided to all the workers and their families. Free transport to send the children of the workers to school included van and boat shuttling service. There was HUMANA available at the site. Place of worship and community hall was available for all the workers and their family members.	Yes
<b>4.4.5.11</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.  - <b>Major compliance</b> -	The estate management has provided free housing facilities to all the workers. Basic amenities such as water and electricity were provided to the workers. Linesite inspection was carried out weekly basis by Estate Hospital Assistant. The last inspection was conducted on 26/05/2021 and records of the inspection were kept available.	Yes
<b>4.4.5.12</b>	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.  - <b>Major compliance</b> -	Genting Plantations Berhad has established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited. Reproductive rights are protected. Briefing of the policy was conducted on 26/02/2021 and 06/04/2021 to the workers during morning muster. Seen the training attendance list.  Procedure on Prevention and Eradication of Sexual Harassment at the Workplace was established with Doc. No.: SMP-GPB-20, Rev. 0 dated 11/10/2013. Process of handling sexual harassment complaint was outlined in the procedure.	Yes

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		Gender Committee was established in the estate and seen the last meeting was conducted on 09/04/2021. There was no case of sexual harassment and violence reported.	
<b>4.4.5.13</b>	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where the company respect the rights of the workers to join or form legal trade unions of their own choosing and to bargain collectively. Briefing of the policy was conducted on 26/02/2021 and 06/04/2021 to the workers during morning muster. Seen the training attendance list.</p> <p>Workers' Welfare Committee was established in the estate and the last meeting was conducted on 26/03/2021 with the representatives from different division and the management. Issues raised during the meeting were recorded in the meeting minutes and actions have been taken to resolved. Evidence of the action taken was sighted.</p>	Yes
<b>4.4.5.14</b>	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.</p> <p><b>- Major compliance -</b></p>	Genting Plantations Berhad has established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where the company shall not use any child labour. Children's right are respected.	Yes
<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 matrix and training programme had been established by the management and documented in the Training Needs, Analysis and Plan for Year 2021. Among the trainings given by the estate are	Yes

Criterion / Indicator		Assessment Findings	Compliance												
	<p>training needs and documentation, including records of training shall be kept.</p> <p><b>- Major compliance -</b></p>	<p>generally covering the aspects of OSH, environment, and best practices. E.g. of training records verified are as follows:</p> <table border="1"> <thead> <tr> <th>Trainings</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Latihan Pemadam Api</td> <td>14/04/2021</td> </tr> <tr> <td>Latihan Bantuan Kecemasan</td> <td>15/03/2021</td> </tr> <tr> <td>Refresher Training Food for Palm &amp; PPE</td> <td>20/02/2021</td> </tr> <tr> <td>Training SOP dan PPE Harvester</td> <td>12/03/2021</td> </tr> <tr> <td>Training PPE, calibration chemical, premix chemical &amp; triple rinsing</td> <td>17/03/2021</td> </tr> </tbody> </table>	Trainings	Date	Latihan Pemadam Api	14/04/2021	Latihan Bantuan Kecemasan	15/03/2021	Refresher Training Food for Palm & PPE	20/02/2021	Training SOP dan PPE Harvester	12/03/2021	Training PPE, calibration chemical, premix chemical & triple rinsing	17/03/2021	
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<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>Training needs and training programme for 2021 was available for verification. It has the information about types of training and targeted audience.</p>	Yes												
<b>4.4.6.3</b>	<p>A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p> <p><b>- Minor compliance -</b></p>	<p>This is also addressed in the training needs and training programme for 2021 as mentioned in Indicator 4.4.6.2.</p>	Yes												
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>															
<b>Criterion 4.5.1: Environmental Management Plan</b>															

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<b>4.5.1.1</b>	<p>An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>Environmental Policy had been established, signed by the Chief Operating Officer on 05/10/2009. The policy was communicated to the employees through various methods such as training, morning muster, display on notice boards to name a few.</p> <p>The environmental management plan dated 19/02/2021 was available for verification. Among the information available in the plan is source of pollution, type of impact, mitigation measures, data required, monitoring plan, and responsible persons.</p>	Yes
<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>Environmental Policy had been established, signed by the Chief Operating Officer on 05/10/2009. The policy was communicated to the employees through various methods such as training, morning muster, display on notice boards to name a few.</p> <p>Environmental improvement and management plan had been established by the estate (dated 19/02/2021) which includes the air pollution, water pollution from estate operations, water pollution from line-site and landfill area, soil erosion, greenhouse gas emissions. All the mitigation measures were established to mitigate the identified pollutions. For example, construction of terrace, planting of cover crop, establishment of riparian buffer zone, adhere the zero-burning policy, proper landfill site.</p> <p>Environmental aspect and impact evaluation register had been established which includes all the estate's activities such as FFB harvesting &amp; evacuation, workshop, field maintenance, nursery, replanting, line-site, and administration. The register was last reviewed in Feb 2021.</p>	Yes



Criterion / Indicator		Assessment Findings	Compliance
4.5.1.3	<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>Environmental improvement and management plan had been established by the estate (dated 19/02/2021) which includes the air pollution, water pollution from estate operations, water pollution from line-site and landfill area, soil erosion, greenhouse gas emissions. All the mitigation measures were established to mitigate the identified pollutions. For example, construction of terrace, planting of cover crop, establishment of riparian buffer zone, adhere the zero-burning policy, proper landfill site.</p> <p>Environmental aspect and impact evaluation register had been established which includes all the estate's activities such as FFB harvesting &amp; evacuation, workshop, field maintenance, nursery, replanting, line-site, and administration. The register was last reviewed in Feb 2021.</p>	Yes
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>Environmental improvement and management plan had been established by the estate (dated 19/02/2021) which includes the air pollution, water pollution from estate operations, water pollution from line-site and landfill area, soil erosion, greenhouse gas emissions. All the mitigation measures were established to mitigate the identified pollutions. For example, construction of terrace, planting of cover crop, establishment of riparian buffer zone, adhere the zero-burning policy, proper landfill site.</p> <p>Environmental aspect and impact evaluation register had been established which includes all the estate's activities such as FFB harvesting &amp; evacuation, workshop, field maintenance, nursery, replanting, line-site, and administration. The register was last reviewed in Feb 2021.</p>	Yes

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<b>4.5.1.5</b>	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.  <b>- Major compliance -</b>	Environmental Policy had been established and signed by the Chief Operating Officer on 05/10/2009. The policy was communicated to the employees through various methods such as training, morning muster, display on notice boards to name a few.	Yes
<b>4.5.1.6</b>	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.  <b>- Major compliance -</b>	This is addressed by Environment Committee meeting. The last meeting was conducted on 12/03/2021 and minutes of meeting was available for verification.	Yes
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>			
<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 an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.  <b>- Major compliance -</b>	Monthly records on energy consumption for non-renewable sources were kept and documented. Based on the records, the diesel consumption is as follows: <ul style="list-style-type: none"> <li>• 2021 – 1.08 lt/mt FFB as at April</li> <li>• 2020 – 1.04 lt/mt FFB</li> </ul>	Yes
<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 to determine energy efficiency of their operations (machineries and vehicle), was available in the estate annual budget.	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.5.2.3	The use of renewable energy should be applied where possible. - <b>Minor compliance</b> -	There was no renewable energy applied by the estate.	Yes
<b>Criterion 4.5.3: Waste management and disposal</b>			
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - <b>Major compliance</b> -	Identification of waste products and sources of pollution is documented in Waste Management Plan (For Estates and Mills). The wastes were categorised to scheduled wastes, domestic wastes and recyclable wastes. The wastes management plan has the information about method of disposal, monitoring & action plan, data required, responsible person and status of implementation.	Yes
4.5.3.2	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products - <b>Major compliance</b> -	Waste management plan was established by the estate to include pollution source, management plan and monitoring plan. For example, source of waste and mitigation plan for scheduled waste, domestic wastes and recyclable waste. The action plan sighted as follows: i. Disposal as scheduled waste by DOE approved contractor ii. Disposal of domestic wastes at designated landfill area iii. Segregation of waste and store at designated recyclable waste area.	Yes
4.5.3.3	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.	Addressed in the Scheduled Waste Management procedure [SMP-GPB-11, rev. 02, dated 09/2020. Scheduled wastes were disposed through licensed vendor and consignment notes as follows were verified: #2021032916ZRCKT3, dated 29/03/2021, SW102 #2021032916F2054Y, dated 29/03/2021, SW410	Yes

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	- Major compliance -	#2021032916958TUR, dated 29/03/2021, SW305	
4.5.3.4	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p>- Major compliance -</p>	Empty pesticides containers were disposed through authorised collector after the process of triple rinsing has been undergone. Receipts of collection dated 17/04/2021 and 10/03/2021 were available for verification.	Yes
4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p>	Disposal of domestic wastes is guided by the Landfill and Domestic Waste Management procedure [SMP-GPB-12, rev. 01, dated 01/12/2014]. The procedure outlines the criteria to be considered in selecting a landfill area and the method to construct wastes pit.	Yes
<b>Criterion 4.5.4: Reduction of pollution and emission</b>			
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p>	All polluting activities were identified through the environmental aspect and impact evaluation register which includes all the estate's activities such as FFB harvesting & evacuation, workshop, field maintenance, nursery, replanting, line-site, and administration. The register was last reviewed in Feb 2021.	Yes
4.5.4.2	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p>	Environmental improvement and management plan had been established by the estate (dated 19/02/2021) which includes the air pollution, water pollution from estate operations, water pollution from line-site and landfill area, soil erosion, greenhouse gas emissions. All the mitigation measures were established to mitigate the identified pollutions. For example, construction of terrace, planting of cover crop,	Yes

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		<p>establishment of riparian buffer zone, adhere the zero-burning policy, proper landfill site.</p> <p>Environmental aspect and impact evaluation register had been established which includes all the estate's activities such as FFB harvesting &amp; evacuation, workshop, field maintenance, nursery, replanting, line-site, and administration. The register was last reviewed in Feb 2021.</p>	
<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> </ul>	<p>Water management plan 2021, dated 14/01/2021 had been established with the main objective to maintain the quality and availability of natural water resources (surface and ground water). Among the plans established were:</p> <ul style="list-style-type: none"> <li>i. Peat area management</li> <li>ii. Flood area management</li> <li>iii. Prevention of water pollution</li> <li>iv. Management of line-site drainage</li> <li>v. Education and training for employees</li> </ul>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	<p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p><b>- Major compliance -</b></p>		
<b>4.5.5.2</b>	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p><b>- Minor compliance -</b></p>	There is no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	Yes
<b>4.5.5.3</b>	<p>Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).</p> <p><b>- Minor compliance -</b></p>	Among the water harvesting methods implemented by the management to conserve water are terracing, water conservation pit and roadside pit.	Yes
<b>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</b>			
<b>4.5.6.1</b>	<p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat</p>	The assessment namely, "Inventory on HCV sites within Genting Plantations Bhd group estates (Sabah Region 1)" by S.K. Yap Forestry and Landscape Advisory Services on Oct 2009 – July 2010. Only HCV 4.2 and HCV 6 were identified at GSPE. Eg: Labuk and Bangkawat Rivers and burial grounds for local communities within estates.	Yes

Criterion / Indicator		Assessment Findings	Compliance
	<p>requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</p> <p><b>- Major compliance -</b></p>		
<b>4.5.6.2</b>	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p><b>- Major compliance -</b></p>	<p>There is no RTE or high biodiversity value at GSPE except for estuarine crocodiles found at Sg Labuk River.</p> <p>The management and monitoring plan for HCV areas has been established which was last reviewed on 17/02/2021. Among the plans established are maintaining the awareness signages such as no fishing, no manuring, no spraying, no slashing, no swimming and also rehabilitation of riparian zones.</p>	Yes
<b>4.5.6.3</b>	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p><b>- Major compliance -</b></p>	<p>The management and monitoring plan for HCV areas has been established which was last reviewed on 17/02/2021. Among the plans established are maintaining the awareness signages such as no fishing, no manuring, no spraying, no slashing, no swimming and also rehabilitation of riparian zones.</p>	Yes
<b>Criterion 4.5.7: Zero burning practices</b>			
<b>4.5.7.1</b>	<p>Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.</p> <p><b>- Major compliance -</b></p>	<p>There was no use of fire for land preparation for replanting. Domestic wastes were disposed at designated landfill.</p>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. <b>- Major compliance -</b>	No special approval granted from DOE as to date since there was no risk of disease at GSPE.	Yes
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. <b>- Major compliance -</b>	No application of controlled burning.	Yes
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>	All the previous palms were felled and chipped as per best practices.	Yes
<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>	Addressed in the Sustainability Management Procedure Manual, Standard Operating Procedures (SOP) and The Oil Palm Manual. The manual covering the activity for replanting, oil palm nursery practices, planting techniques, soil conservation and terracing, pest and diseases, weed management, manuring of oil palm, immaturity, harvesting, crop forecasting and managing difficult soils. All of the activities have been described comprehensively in the Standard	Yes



Criterion / Indicator		Assessment Findings	Compliance						
		operating procedure (SOP) and pictorial SOP. All the estate implemented through its daily operations.							
<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>	Generally, the soil conservation measures implemented at the sloping land are construction of terrace, establishment of cover crop and construction of roadside drain. This is guided by the following procedures: <ul style="list-style-type: none"> <li>• OPM 4: Soil conservation and terracing (rev 2013)</li> <li>• Steep land Management SMP –GPB-10</li> </ul>	Yes						
<b>4.6.1.3</b>	A visual identification or reference system shall be established for each field.  <b>- Major compliance -</b>	The estate has a file known as File 56: Estate Maps & Satellite Images where the following details were available for reference: <ul style="list-style-type: none"> <li>i. Soil Map</li> <li>ii. Slope class map</li> <li>iii. Blocking map</li> <li>iv. Riparian buffer zone map</li> </ul>	Yes						
<b>Criterion 4.6.2: Economic and financial viability plan</b>									
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.  <b>- Major compliance -</b>	Annual business plan is addressed in the form of annual budget and the projection for 4 years (2021-2024). It has the information about projected FFB production, finance allocations for operations such as harvesting and field upkeep, administration and capital expenditure.	Yes						
<b>4.6.2.2</b>	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-	A 5-year replanting programme has been established which details are as follows: <table border="1" data-bbox="1048 1331 1682 1378"> <thead> <tr> <th>Estate</th> <th>Year</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Estate	Year	Ha				Yes
Estate	Year	Ha							

Criterion / Indicator		Assessment Findings				Compliance
	5 years. - Major compliance -	GSPE	2020	120.40		
			2021	170.59		
			2022	200.79		
			2023	193.44		
			2024	238.28		
			2025	186.69		
<b>4.6.2.3</b>	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production : cost per tonne of FFB d) Price forecast e) e) Financial indicators : cost benefit, discounted cash flow, return on investment - Major compliance -	Verification of the 2021 budget showed that the information such as crop projection, cost of production and return of investment was available.				Yes
<b>4.6.2.4</b>	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	Monitoring of actual expenses against the allocated budget for the field operation is reported monthly and justification of underspent or overspent can be seen in the monthly expenditure and progress report.				Yes
<b>Criterion 4.6.3: Transparent and fair price dealing</b>						

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4.6.3.1	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p><b>- Major compliance -</b></p>	<p>The estate has engaged FFB transporter to transport FFB from estate to mill. Sampled of the agreement as below:</p> <ul style="list-style-type: none"> <li>i. Agreement No.: GSPE/FFB/20/01/01 which valid until 31/12/2022</li> <li>ii. Agreement No.: GSPE/FFB/20/01/02 which valid until 31/12/2022</li> </ul> <p>The payment shall be made within 30 days from the date of Loading and Transportation Works is carried out as per the rate outlined in Schedule 2.</p>	Yes
4.6.3.2	<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>Payment terms were clearly stated in the Schedule 2 of the agreement. Verified the payment advices as below:</p> <ul style="list-style-type: none"> <li>i. Transaction Ref.: 523185000100032 dated 12/05/2021</li> <li>ii. Transaction Ref.: 523184280100016 dated 12/05/2021</li> <li>iii. Transaction Ref.: 522817730100046 dated 14/04/2021</li> <li>iv. Transaction Ref.: 522817730100011 dated 14/04/2021</li> </ul> <p>Besides, interviewed with contractor and FFB supplier also confirmed that payment was made promptly.</p>	Yes
<b>Criterion 4.6.4: Contractor</b>			
4.6.4.1	<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>The contractors engaged by the estate management has signed agreement prior to provide services. There were clauses where the contractors shall ensure compliance with the requirements of RSPO, ISCC, MSPO and OSHA 1994.</p> <p>Phone interviewed with the contractor confirmed that MSPO requirements were briefed by the management and he understood.</p>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	The estate has engaged FFB transporter to transport FFB from estate to mill. Sampled of the agreement as below: i. Agreement No.: GSPE/FFB/20/01/01 which valid until 31/12/2022 ii. Agreement No.: GSPE/FFB/20/01/02 which valid until 31/12/2022	Yes
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. <b>- Minor compliance -</b>	<i>The management to ensure that the Addendum to Memorandum of Agreement dated 13/07/2020 issued by Senior Vice President - Plantations (M) is fully implemented where agreement for FFB transporter to include the specific clause.</i>  <i>Thus, an OFI was raised.</i>	OFI
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. <b>- Major compliance -</b>	Control points applicable being observed by estate management as per sighted sample agreements. Evidence of agreed contracts are available.	Yes
<b>4.7 Principle 7: Development of new planting</b>			
<b>Criterion 4.7.1: High biodiversity value</b>			
4.7.1.1	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. <b>- Major compliance -</b>	There is no development of new planting at visited estate.	N/A

Criterion / Indicator		Assessment Findings	Compliance
<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 -	There is no development of new planting at visited estate.	N/A
<b>Criterion 4.7.2: Peat Land</b>			
<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 -	There is no development of new planting at visited estate.	N/A
<b>Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)</b>			
<b>4.7.3.1</b>	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations.  - Major compliance -	There is no development of new planting at visited estate.	N/A
<b>4.7.3.2</b>	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.	There is no development of new planting at visited estate.	N/A

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed.  - Major compliance -	There is no development of new planting at visited estate.	N/A
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.  - Minor compliance -	There is no development of new planting at visited estate.	N/A
<b>Criterion 4.7.4:</b> Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation.  - Major compliance -	There is no development of new planting at visited estate.	N/A
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure.  - Major compliance -	There is no development of new planting at visited estate.	N/A
<b>Criterion 4.7.5:</b> Planting on steep terrain, marginal and fragile soils			

Criterion / Indicator		Assessment Findings	Compliance
<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.  - Major compliance -	There is no development of new planting at visited estate.	N/A
<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.  - Major compliance -	There is no development of new planting at visited estate.	N/A
<b>4.7.5.3</b>	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion.  - Major compliance -	There is no development of new planting at visited estate.	N/A
<b>Criterion 4.7.6: Customary land</b>			
<b>4.7.6.1</b>	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.  - Major compliance -	There is no development of new planting at visited estate.	N/A

Criterion / Indicator		Assessment Findings	Compliance
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>	There is no development of new planting at visited estate.	N/A
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>	There is no development of new planting at visited estate.	N/A
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>	There is no development of new planting at visited estate.	N/A
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. <b>- Major compliance -</b>	There is no development of new planting at visited estate.	N/A
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. <b>- Major compliance -</b>	There is no development of new planting at visited estate.	N/A



Criterion / Indicator		Assessment Findings	Compliance
<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>	There is no development of new planting at visited estate.	N/A
<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>	There is no development of new planting at visited estate.	N/A

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

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 developed Malaysian Sustainable Palm Oil (MSPO) Policy, version dated 18/03/2014 signed by President & Chief Operating Officer, Mr. Yong Chee Kong. The company ensure compliance with MSPO and the MPOB Code of Practice requirements.  Briefing of the policy was conducted on 05/04/2021 to the workers during morning muster. Seen the training attendance list.	Yes
<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>	In the policy above, the company also committed to continue to assess and develop new and innovative techniques, approaches and practices with the objective of continuous improvement in the journey towards achieving sustainable palm oil.	Yes
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	Internal audit plan was established to carry internal audit for MSPO Part 4 and MSPO SCCS in Genting Sabapalm Oil Mill. The date of audit was planned on 29/03/2021 conducted by Mr. Pawatang and Mr. Madung. Seen the MSPO MS2530:4 – 2014 Part 4 & MSPO SCCS Internal Audit Report where total 15 observations were raised under MS250:4 – 2014. Action plan, person-in-charge, timeline and status of the observation was developed and updated.	Yes

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<p><b>4.1.2.2</b></p>	<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>Genting Plantations Berhad has developed Sustainability Internal Audit procedure with Doc. No.: SMP-GPB-03, Rev. 02 dated 27/03/2018 to plan and implement internal audits to determine conformance to the applicable sustainability standards' requirements such as RSPO, MSPO and ISCC. The frequency of the audit is not less than once a year.</p> <p>The last internal audit was carried out on 29/03/2021 with total 15 observations were raised and recorded in the internal audit report. No non-conformity was raised during the audit.</p>	<p>Yes</p>
<p><b>4.1.2.3</b></p>	<p>Reports shall be made available to the management for their review.</p> <p><b>- Major compliance -</b></p>	<p>The Mill Manager, Mr. Yee Chee Fui has reviewed the Internal Audit Report Summary and acknowledged on 29/03/2021.</p>	<p>Yes</p>
<p><b>Criterion 4.1.3 – Management Review</b></p>			
<p><b>4.1.3.1</b></p>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>RSPO &amp; MSPO Part 3 &amp; 4 Management Review meeting was conducted on 10/04/2021 for both Genting Sabapalm Oil Mill and Genting Sabapalm Estate. The meeting was chaired by Senior Estate Manager and attended by relevant personnel from both mill and estate. Meeting minutes was available.</p>	<p>Yes</p>
<p><b>Criterion 4.1.4 – Continual Improvement</b></p>			
<p><b>4.1.4.1</b></p>	<p>The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.</p> <p><b>- Major compliance -</b></p>	<p>The action plan for continual improvement with regards to social and environment impacts, and opportunities were available in the mill in various forms such as social action plan, environmental management plan, and water management plan to name a few. The plan clearly states the possible issues, action to be taken, person in charge, time frame and status of action.</p>	<p>Yes</p>

<p><b>4.1.4.2</b></p>	<p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.</p> <p><b>- Major compliance -</b></p>	<p>The mill continuously ensures there are improvement practices in line with new information and techniques introduced in the workforce. Since the last assessment, the mill has invested in installing the following technologies:</p> <ul style="list-style-type: none"> <li>i. Electrostatic Precipitator (ESP), functioning as an air cleaner for the smoke emission through boiler’s chimney, commenced operation in November 2020</li> <li>ii. 1 unit of belt press machine, for suspended solid filtration system, expected to be in operation in Sep 2021</li> </ul>	<p>Yes</p>
<p><b>4.2 Principle 2: Transparency</b></p>			
<p>Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements</p>			
<p><b>4.2.1.1</b></p>	<p>The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has developed Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 23/02/2018 for the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties. Meeting shall be carried out at least six monthly and annually for internal and external stakeholders. The topics to be discussed such as complaint &amp; grievances, environmental and biodiversity concerns, social issue and suggestions for improvement. The procedure has been briefed to the internal and external stakeholders. Briefing to the external via WhatsApp was conducted on 28/05/2021. Seen the screenshot of the briefing.</p> <p>As of the COVID-19 pandemic, the process of communication and consultation of the mill has been channel through WhatsApp. Stakeholder meeting was unable to conduct and the management has taken initiative to brief the stakeholders via WhatsApp. The circular</p>	<p>Yes</p>

		dated 27/05/2021 was sent to the affected stakeholders and evidence of screenshot of the messages were sighted such as school's representative, police representative and GSOM's smallholders' group.	
<b>4.2.1.2</b>	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.  - <b>Major compliance</b> -	Genting Sabapalm Oil Mill has issued the list of documents that could be requested by the stakeholders to all the relevant stakeholders of the mill. The stakeholders are required to register in Enquiry Register Book prior to access to the documents. The list of documents not limited to: <ul style="list-style-type: none"> <li>• Land title</li> <li>• Policies</li> <li>• Reports – EAI, SIA, HCV and audit reports</li> <li>• Management plans</li> <li>• Procedures</li> </ul>	Yes
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication with the relevant stakeholders.  - <b>Major compliance</b> -	Genting Plantation Berhad has developed Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 23/02/2018 for the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties. Meeting shall be carried out at least six monthly and annually for internal and external stakeholders. The topics to be discussed such as complaint & grievances, environmental and biodiversity concerns, social issue and suggestions for improvement.	Yes
<b>4.2.2.2</b>	The management shall nominate management officials at the	Acting Manager of the Mill, Mr. Yee Chee Fui has been appointed by Senior Manager Operations to be the representative for ISCC, MPOB	Yes

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	operating unit responsible for issues related to <i>indicator 1</i> . <b>- Minor compliance -</b>	Co-Gap, Social, ISO, QESH, RSPO and MSPO Appointment letter dated 02/01/2021 was sighted.	
<b>4.2.2.3</b>	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. <b>- Major compliance -</b>	Stakeholder list for Genting Sabapalm Oil Mill as at March 2021 was sighted. The stakeholders such as FFB suppliers, contractors, suppliers, local communities and government authorities were included into the list.  A WhatsApp message to relevant stakeholders was sent to inform the stakeholders that annual stakeholder meeting will be postponed and replaced by using WhatsApp chat. The mill representatives sent out the messages on 28/05/2021 and no negative issue received.	Yes
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. <b>- Major compliance -</b>	The traceability implementation is addressed in a procedure [Sustainability Management Procedure Manual (SMPM)], Supply Chain and Traceability (Mill) [SMP-GPB-23, rev. 10, Mar 2020].	Yes
<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 written together with other schemes audit such as RSPO and ISCC, was available for verification (see Criterion 4.1.2 for details).	Yes
<b>4.2.3.3</b>	The management shall identified and assign suitable employees to implement and maintain traceability system. <b>- Minor compliance -</b>	GPB has defined the roles and responsibilities for the implementation and maintenance of its traceability system in the Supply Chain and Traceability (Mill) procedure. Among the positions identified are: <ul style="list-style-type: none"> <li>• Weighbridge Operator</li> <li>• Chief Clerk</li> <li>• Mill Manager</li> </ul>	Yes

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		<ul style="list-style-type: none"> <li>Marketing Palm Products Dept. (MPP)</li> <li>Sustainability Dept.</li> </ul>	
<b>4.2.3.4</b>	<p>Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.</p> <p><b>- Major compliance -</b></p>	<p>Records of storage, sales, delivery or transportation of crude palm oil and palm kernel are maintained in various forms such as:</p> <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> <p>Based on the mass balance accounting, the following information was obtained:</p> <p>Period: Jul 2020 – May 2021</p> <p>MSPO certified FFB received = 77,419.21 mt</p> <p>MSPO certified FB processed = 77,419.21 mt</p> <p>MSPO certified CPO produced = 16,761.17 mt</p> <p>MSPO certified CPO sold = 0</p> <p>MSPO certified PK produced = 3,702.21 mt</p> <p>MSPO certified PK sold = 0</p>	Yes
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
<b>4.3.1.1</b>	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.	The mill has obtained approval from Jabatan Tenaga Kerja Sabah for the following:	Yes

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	<p><b>- Major compliance -</b></p>	<ul style="list-style-type: none"> <li>i. S/N: 600-1/2/13/9 Jld.6 (05/SDK/2020-0284) for female workers to work at night from 10pm to 5am which valid until 25/08/2022.</li> <li>ii. S/N: 600-1/2/8/229 (11/SDK/2019-0342) for deduction of wages for electricity and medical cost of dependent which valid until 30/12/2021.</li> </ul> <p>GSOM monitored compliance with applicable local, state, national and ratified international laws and regulations through evaluation of compliance. The last evaluation of compliance was done in May 2021 covering the performance period of Jan-Apr 2021. Among the evidence of legal compliance verified were as follows:</p> <ul style="list-style-type: none"> <li>i. DOE License, #005261, valid from 01/07/2020 to 30/06/2021</li> <li>ii. Water tube boiler (No. 3), PMD 10666, certificate no. PMD-SB/19 25407, valid until 09/11/2021</li> <li>iii. Power Generation License 2020/02430 valid until 31/12/2020</li> <li>iv. Weighbridge certificate by Metrology Corporation Malaysia under no B1200052 and B1200051 valid until 16/7/2021</li> <li>v. PPDNKK.SDK&gt;198/1979(SK) license S000600 for Diesel, valid until 14/03/2021. Application was made in May 2021 due to delayed of BOMBA supporting letter because of MCO</li> <li>vi. Water tube boiler (No. 3), PMD 10666, valid until 09/11/2021</li> <li>vii. MPOB License, #620051004000, valid until 20/08/2022</li> </ul>	
<p><b>4.3.1.2</b></p>	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>All related legal requirements had been documented in "Master List of Legal Requirements &amp; Best Practices Applicable to Plantation Operations in Malaysia". It was last updated on 08/09/2020.</p>	<p>Yes</p>
<p><b>4.3.1.3</b></p>	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming</p>	<p>Addressed in Legal Requirement Register [Ref.: doc no. SMP-GPB-22 rev. 08 dated March 2020]. The process of law changes as follows:</p>	<p>Yes</p>



	into force. <b>- Major compliance -</b>	<ul style="list-style-type: none"> <li>i. Notification of changes from various source of information i.e. Lawnet, government gazette and sustainability team based in the Sandakan HQ.</li> <li>ii. Monitoring for changes in the Law</li> <li>iii. Clarification and review on the changes</li> <li>iv. Updating of the Legal register administered internally</li> <li>v. Notification to the operating units and/or the relevant person in charge</li> </ul> <p>The established legal register has incorporated the latest changes of law.</p>	
<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. <b>- Minor compliance -</b>	Mdm Surianti Mayah had been assigned as the PIC for monitoring compliance and updating changes in law [ref.: appointment letter dated 01/09/2020]. Checking of status compliance was regularly done through the utilisation of form no. SP-MGR-03-F03-0, rev. 13. The latest period under review was Jan-Apr2021.	Yes
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. <b>- Major compliance -</b>	Genting Sabapalm Oil Mill is located inside of the land of Genting Sabapalm Estate, Title No. Country Lease 085319231. The land is belonging to Genting Plantations Berhad. Sighted the copy of the land title. There is no issue on land use claims evidence during the audit. Interviewed with the local communities confirmed that no land encroachment or land dispute reported.	Yes
<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.	Genting Sabapalm Oil Mill is located inside of the land of Genting Sabapalm Estate. The land is belonging to Genting Plantations Berhad. Sighted the copy of the land title. There is no issue on land use claims	Yes

	- <b>Major compliance</b> -	evidence during the audit. Interviewed with the local communities confirmed that no land encroachment or land dispute reported.	
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - <b>Major compliance</b> -	The mill land title was under Genting Sabapalm Estate. The mill located in Title No. Country Lease 085319231.	Yes
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - <b>Minor compliance</b> -	There is no land dispute in the Genting Sabapalm Oil Mill at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified. Interviewed with the local communities confirmed that no land encroachment or land dispute reported.	Yes
<b>Criterion 4.3.3 – Customary rights</b>			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - <b>Major compliance</b> -	There is no customary land or negotiated agreements within the Genting Sabapalm Oil Mill’s land area.	Yes
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - <b>Minor compliance</b> -	The right to use the land is not disputed and there was no customary land within the Genting Sabapalm Oil Mill.	Yes
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - <b>Major compliance</b> -	There is no land dispute or customary rights issues in the mill.	Yes
<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>	<p>Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.</p> <p><b>- Minor compliance -</b></p>	<p>Social Impact Assessment (SIA) &amp; Human Rights Impact Assessment (HRIM) Report was reviewed on March 2021 for both Genting Sabapalm Oil Mill and Genting Sabapalm Estate by Sustainability Department. The assessment has involved relevant stakeholders such as schools' representatives, local authorities, contractors, transporters and workers. No negative impact was identified during the assessment through interviewed. Social Management and Monitoring Plan of Genting Sabapalm Oil Mill was reviewed and last updated on 27/04/2021.</p>	Yes
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has established Complaints and Grievances procedure with Doc. No.: SMP-GPB-19, Rev. 04 dated March 2020 to provide guidelines on handling complaints &amp; grievances involved internal and external stakeholders. All the written confidential complaints shall be dealt by Manager. The timeframe for the action to be taken depends on seriousness of the complaints or grievance. The accepted timeframe to acknowledge and respond to the complaint or grievances is within 1 month upon receipt.</p>	Yes
<b>4.4.2.2</b>	<p>The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.</p> <p><b>- Major compliance -</b></p>	<p>The mill has implemented Complaints/ Grievances Record Book to record any complaint or grievance received. Sampled of the record of complaint as below:</p> <ul style="list-style-type: none"> <li>i. Ref. No.: 063 dated 14/05/2021</li> </ul> <p>Issue: Water tank leakage and the pole broken. No water supply at house.</p>	Yes

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		Action taken: The management has sent the carpenter to repair the water tank and pole on 19/05/2021. Seen the photo and screenshot of communication in WhatsApp. The complainant has acknowledged after action taken.	
<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> -	There was a complaint box for worker/ stakeholders available in the security post. Seen the photo evident and interviewed with the workers confirmed that the complaint box is available.	Yes
<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> -	Briefing to the external communities included smallholders via WhatsApp was conducted on 28/05/2021. Seen the screenshot of the briefing. Interviewed with the external stakeholders confirmed that they are aware of the complaint procedure.	Yes
<b>4.4.2.5</b>	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.  - <b>Major compliance</b> -	Records of complaint or grievance for February 2019 was available for review during the time of audit.	Yes
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
<b>4.4.3.1</b>	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.  - <b>Minor compliance</b> -	The mill management has provided job opportunities to the local communities and this confirmed through phone interviewed with the representative of nearby village. Besides, the mill has supplied potable water to <i>Klinik Kesehatan Tagas-tagas</i> and living quarters of SK Tagas-tagas.	Yes

<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 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><b>- Major compliance -</b></p>	<p>The Occupational Safety and Health Policy had been established, signed by President &amp; Chief Operating Officer on 1st July 2018. The policy was communicated to the employees through various methods such as training, morning muster, display on notice boards to name a few.</p>	Yes
<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</li> </ul>	<p>OSH Plan was established.</p> <ul style="list-style-type: none"> <li>a) The Occupational Safety and Health Policy had been established, signed by President &amp; Chief Operating Officer on 1st July 2018. The policy was communicated to the employees through various methods such as training, morning muster, display on notice boards to name a few.</li> <li>b) SOP for HIRARC (SP-MGR-01) was made available. The technique was described accordingly in the SOP. The HIRARC was reviewed on 11/1/18 to include all the activities in the mill, for example, the HIRARC for laboratory, sterilizer station, workshop, water treatment plant, boiler station and clarification station. The last CHRA was conducted on 23/11/2020 by Rehpro Scientific Sdn Bhd. The report [#RSSB/CHRA/2020-038] was available for verification.</li> <li>c) Training matrix and training programme were established by the management. Evidence of adequate and appropriate training on safe working practices provided to workers was sighted, for example: MSPO/RSP0 briefing (04/04/2021), training on chemical management</li> <li>d) Issuance of PPE to employees is recorded in a standard form which has the information about name of employee, type of PPE, workstation, date of issuance and acknowledgment of receipt.</li> </ul>	Yes

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	<p>Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers’ safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees’ safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>e) SOP for handling chemical management was addressed in Chemical Management procedure (SP-MGR-08), Rev 01, dated 01/08/2017. The procedure outline the handling of chemicals in accordance to the regulation.</p> <p>f) SHC Organization – Chairman: Acting Mill Manager, SHC secretary: Mill Engineer. Organization chart of OSH committee dated 01/09/2020 was available</p> <p>g) Records were available confirming that quarterly OSH meetings had been held at the GSOM. Ref.: OHS meeting minutes (GSOM)– #24/07/2020, 17/10/2020, 15/12/2020, 31/03/2021</p> <p>h) The mill has site specific Plans in the System Procedure, Emergency Response Procedure (SP-MGR-04), Rev:01, dated 01/08/2017) including ERP for oil spillage, fire in the mill, effluent overflow, accident and chemical spillage. Maps showing assembly areas and up-to-date lists of emergency contacts were also established. The last fire drill training was conducted on 01/10/2020.</p> <p>i) There are 6 units of first aid kit provided at various workstations at the mill such as workshop, engine room, store and office.</p> <p>j) All accidents are to be investigated and reported to Head Office. Since the last assessment, there has been no occupational accident in the mill.</p>	
<b>Criterion 4.4.5:</b> Employment conditions			
<b>4.4.5.1</b>	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has established Social Policy dated 14/09/2020 signed by President &amp; Chief Operating Officer. The company respect human rights and support international human rights law. Briefing of the policy was conducted during morning muster on 19/09/2020. Seen the evidence of Morning Muster Report.</p>	Yes

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<p><b>4.4.5.2</b></p>	<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>Genting Plantations Berhad has established Social Policy dated 14/09/2020 signed by President &amp; Chief Operating Officer. The company shall not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.</p>	<p>Yes</p>
<p><b>4.4.5.3</b></p>	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>Sampled 12 payslips from September 2020, December 2020 and May 2021 found that the workers were paid according to Minimum Wage Order 2020. Any work on rest day and public holiday was paid as per Sabah Ordinance.</p>	<p>Yes</p>
<p><b>4.4.5.4</b></p>	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p><b>- Minor compliance -</b></p>	<p>The mill did not engage any permanent contractor to work in the mill. Only based on project basis and there was no permanent workers engaged by the contractor.</p>	<p>Yes</p>
<p><b>4.4.5.5</b></p>	<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>	<p>The mill has established a List of Executive, Staff &amp; Worker where record of full name, employee no., date joined, gender, date of birth, wages and type of work were clearly stated in the list.</p>	<p>Yes</p>
<p><b>4.4.5.6</b></p>	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment</p>	<p>All the workers are employed under direct employment. 12 employment contracts were sampled and found that terms and</p>	<p>OFI</p>

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	<p>contract shall be made available for each and every employee indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>conditions of the employment were clearly stated in the contract and signed by the workers.</p> <p><i>The mill to ensure the employment contract is filled with complete information such as start date and identification number/ passport number of the employees.</i></p> <p><i>Thus, an OFI was raised.</i></p>	
<b>4.4.5.7</b>	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p><b>- Major compliance -</b></p>	<p>The mill management has implemented punch card system to monitor the working hours and overtime of the workers. All the records were transparent to the workers. The workers were paid as per Sabah Ordinance for the overtime carried out. This has confirmed through phone interviewed with the workers.</p>	Yes
<b>4.4.5.8</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>Interviewed with the workers confirmed that they have rest time in between of the working hours. Overtimes were paid according to the rate stated in the agreement and regulatory requirements. The overtime offered upon mutually agreement.</p>	Yes
<b>4.4.5.9</b>	<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>Wages and overtime were paid according to Sabah Ordinance and punch card of the workers. Total hours of overtime and daily attendance has recorded in the LMD system and the payslips. Refer to indicator 4.4.5.3.</p>	Yes
<b>4.4.5.10</b>	<p>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.</p> <p><b>- Minor compliance -</b></p>	<p>All the workers are provided with free medical facilities. Free housing facilities were provided to all the workers and their families. Free transport to send the children of the workers to school and there was HUMANA available at the site. Place of worship and community hall was available for all the workers and their family members.</p>	Yes



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<p><b>4.4.5.11</b></p>	<p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p> <p><b>- Major compliance -</b></p>	<p>The mill management has provided free housing facilities to all the workers. Basic amenities such as water and electricity were provided to the workers. Linesite inspection was carried out weekly basis by Estate Hospital Assistant. The last inspection was conducted on 25/05/2021 and issues were recorded in the report by HA. The Acting Manager has briefed on the issues raised by HA on 26/05/2021 during morning muster to inform all the workers to ensure all the workers take care the environment of the housing area. Seen the Morning Muster Report.</p>	<p>Yes</p>
<p><b>4.4.5.12</b></p>	<p>The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited. Reproductive rights are protected. Briefing of the policy was conducted on 13/11/2020.</p> <p>Procedure on Prevention and Eradication of Sexual Harassment at the Workplace was established with Doc. No.: SMP-GPB-20, Rev. 0 dated 11/10/2013. Process of handling sexual harassment complaint was outlined in the procedure.</p> <p>Gender Committee was established in the mill and seen the last meeting was conducted on 08/04/2021. Policy and procedure of reporting sexual harassment case was briefed during the meeting. There was no case of sexual harassment and violence reported.</p>	<p>Yes</p>
<p><b>4.4.5.13</b></p>	<p>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</p>	<p>Genting Plantations Berhad has established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where the company respect the rights of the workers to join or form legal trade unions of their own choosing and to bargain collectively. Briefing of the policy</p>	<p>Yes</p>

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	<p>collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p><b>- Major compliance -</b></p>	<p>was conducted during morning muster on 19/09/2020. Seen the evidence of Morning Muster Report.</p> <p>Workers' Welfare Committee was established in the mill and the last meeting was conducted on 31/03/2021 with the representatives from different races and the management. Issues raised during the meeting were recorded in the meeting minutes with proposed action and person in charge.</p>											
<p><b>4.4.5.14</b></p>	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where the company shall not use any child labour. Children's right are respected.</p>	<p>Yes</p>										
<p><b>Criterion 4.4.6: Training and competency</b></p>													
<p><b>4.4.6.1</b></p>	<p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p><b>- Major compliance -</b></p>	<p>Training matrix and training programme had been established by the management. Among the trainings given by the mill are generally covering the aspects of OSH, environment, and best practices. E.g. of training records verified are as follows:</p> <table border="1" data-bbox="1048 1018 1872 1313"> <thead> <tr> <th data-bbox="1048 1018 1697 1050">Trainings</th> <th data-bbox="1697 1018 1872 1050">Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="1048 1050 1697 1145">Chemical Management &amp; Emergency action, Emergency response plan &amp; Safety Equipment, Firefighting &amp; Evacuation, First aid</td> <td data-bbox="1697 1050 1872 1145">01/10/2020</td> </tr> <tr> <td data-bbox="1048 1145 1697 1209">SOP &amp; ECP for individual station, PPE, HIRARC &amp; EAI, Complaint &amp; grievances procedure</td> <td data-bbox="1697 1145 1872 1209">03/08/2020</td> </tr> <tr> <td data-bbox="1048 1209 1697 1281">Amended SOP for confined space (GSOM-SOP-MGR-03)</td> <td data-bbox="1697 1209 1872 1281">27/07/2020</td> </tr> <tr> <td data-bbox="1048 1281 1697 1313">Scheduled wastes management</td> <td data-bbox="1697 1281 1872 1313">01/12/2020</td> </tr> </tbody> </table>	Trainings	Date	Chemical Management & Emergency action, Emergency response plan & Safety Equipment, Firefighting & Evacuation, First aid	01/10/2020	SOP & ECP for individual station, PPE, HIRARC & EAI, Complaint & grievances procedure	03/08/2020	Amended SOP for confined space (GSOM-SOP-MGR-03)	27/07/2020	Scheduled wastes management	01/12/2020	<p>Yes</p>
Trainings	Date												
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Amended SOP for confined space (GSOM-SOP-MGR-03)	27/07/2020												
Scheduled wastes management	01/12/2020												

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		QESH Policy, RSPO & MSPO Policy, Program Kesedaran Kitar Semula Bahan Buangan Domestik/zero burning	03/02/2020	
<b>4.4.6.2</b>	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.  <b>- Major compliance -</b>	Training needs and training programme was established by the management, which was prepared by the mill manager on 18/12/2021. It has the information about types of training and targeted audience.		Yes
<b>4.4.6.3</b>	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.  <b>- Minor compliance -</b>	This is also addressed in the training needs and training programme for 2021 as mentioned in Indicator 4.4.6.2.		Yes
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>				
<b>Criterion 4.5.1: Environmental Management Plan</b>				
<b>4.5.1.1</b>	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.  <b>- Major compliance -</b>	Environmental Policy had been established, signed by the Chief Operating Officer on 05/10/2009. The policy was communicated to the employees through various methods such as training, morning muster, display on notice boards to name a few.  The environmental management plan dated 28/04/2021 was available for verification. Among the information available in the plan is source of pollution, type of impact, mitigation measures, timeframe of completion, monitoring plan, responsible persons, and status of progress.		Yes

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<p><b>4.5.1.2</b></p>	<p>The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations</p> <p><b>- Major compliance -</b></p>	<p>Environmental Policy had been established, signed by the Chief Operating Officer on 05/10/2009. The policy was communicated to the employees through various methods such as training, morning muster, display on notice boards to name a few.</p> <p>Environmental improvement and management plan had been established by the mill (dated 28/04/2021) which includes the air pollution, water pollution from mill operations, water pollution from line-site and landfill area, noise pollution, soil pollution, greenhouse gas emissions, waste management and water usage. All the mitigation plans (objective) were established to mitigate the identified pollutions. For example, to construct biogas plant, optimize usage and reduce wastage of water, scheduled waste management, continue desilting/desludging on existing land application areas, reduce air particulate emissions and regular maintenance of septic tank.</p> <p>Environmental aspect and impact register had been established to include all the mill's activities such as FFB reception, sterilizer, threshing, pressing, clarification, laboratory, workshop and effluent treatment plant. The register was last reviewed on 24/04/2021.</p>	<p>Yes</p>
<p><b>4.5.1.3</b></p>	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>Environmental improvement and management plan had been established by the mill (dated 28/04/2021) which includes the air pollution, water pollution from mill operations, water pollution from line-site and landfill area, noise pollution, soil pollution, greenhouse gas emissions, waste management and water usage. All the mitigation plans (objective) were established to mitigate the identified pollutions.</p> <p>All the mitigation plans (objective) were established to mitigate the identified pollutions. For example, to construct biogas plant, optimize usage and reduce wastage of water, scheduled waste management, continue desilting/desludging on existing land application areas,</p>	<p>Yes</p>

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		reduce air particulate emissions and regular maintenance of septic tank.	
<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>	Environmental improvement and management plan had been established by the mill (dated 28/04/2021) which includes the air pollution, water pollution from mill operations, water pollution from line-site and landfill area, noise pollution, soil pollution, greenhouse gas emissions, waste management and water usage. All the mitigation plans (objective) were established to mitigate the identified pollutions.  All the mitigation plans (objective) were established to mitigate the identified pollutions. For example, to construct biogas plant, optimize usage and reduce wastage of water, scheduled waste management, continue desilting/desludging on existing land application areas, reduce air particulate emissions and regular maintenance of septic tank.	Yes
<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>	Environmental Policy had been established and signed by the Chief Operating Officer on 05/10/2009. The policy was communicated to the employees through various methods such as training, morning muster, display on notice boards to name a few.	Yes
<b>4.5.1.6</b>	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.  <b>- Major compliance -</b>	This is addressed by Environmental Performance Monitoring Committee (EPMC) meeting. The last meeting was conducted on 01/03/2021 and minutes of meeting was available for verification.	Yes
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>			
<b>4.5.2.1</b>	Consumption of non-renewable energy shall be optimized and	Monthly records on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to	Yes

	<p>closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period</p> <p><b>- Major compliance -</b></p>	<p>optimize use of renewable energy. Data is being compiled for comparison and control for future improvement.</p> <p>Based on the records, the diesel consumption is as follows:</p> <ul style="list-style-type: none"> <li>• 2021 – 1.74 lt/mt FFB as at April</li> <li>• 2020 – 0.63 lt/mt FFB</li> </ul>	
<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 to determine energy efficiency of their operations (machineries and vehicle), was available in the mill yearly budgets.</p>	Yes
<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>Biomass (fibre and shell) were used as biofuel at the boiler operation. The quantity of biomass also monitored to achieve the expected percentage of fibre (11%) and shell (5%) quantities being consumed.</p>	Yes
<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><b>- Major compliance -</b></p>	<p>Identification, segregation and storage of waste was established to include source of wastes at various location such as processing stations, workshop, line-site, office, diesel tank, chemical store, empty container store, petrol/lubricant store, scheduled waste store, general store, washing bay, scrap iron yard, clinic, shops, religious area, landfill area, recyclable waste store and vehicle garage.</p>	Yes
<b>4.5.3.2</b>	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p>	<p>Waste management plan was established by the mill to include pollution source, management plan and monitoring plan. For example, source of waste and mitigation plan for scheduled waste, domestic wastes and recyclable waste. The action plan sighted as follows:</p> <ul style="list-style-type: none"> <li>i. Disposal as scheduled waste by DOE approved contractor</li> <li>ii. Disposal of domestic wastes at designated landfill area</li> </ul>	Yes

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	b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. <b>- Major compliance -</b>	iii. Segregation of waste and store at designated recyclable waste area.	
<b>4.5.3.3</b>	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005 <b>- Major compliance -</b>	Addressed in the Scheduled Waste procedure [SP-MGR-09, rev. 01, dated 01/08/2017]. Scheduled wastes were disposed through licensed vendor and consignment notes as follows were verified: #20210211119Y26PB, dated 10/02/2021, SW410 (rags) #20210211115AWQBU, dated 11/02/2021, SW102 #2021021111HNG3QV, dated 11/02/2021, SW305 #2021021111UHBMX7, dated 11/02/2021, SW410 (used filter)	Yes
<b>4.5.3.4</b>	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. <b>- Minor compliance -</b>	Domestic wastes were disposed as per SOP (Landfill and domestic waste management, SMP-GPB-12, Rev:01, Dated 1/12/2014) at landfill area, Genting Sabapalm Estate.	Yes
<b>Criterion 4.5.4: Reduction of pollution and emission</b>			
<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>	All polluting activities were identified through the environmental aspect and impact evaluation which include all the mill's activities such as FFB reception, sterilizer, threshing, pressing, clarification, boiler, laboratory, workshop and effluent treatment plant. The register was last reviewed on 24/04/2021.	Yes
<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>	Environmental improvement and management plan had been established by the mill (dated 28/04/2021) which includes the air pollution, water pollution from mill operations, water pollution from line-site and landfill area, noise pollution, soil pollution, greenhouse gas emissions, waste management and water usage. All the mitigation plans (objective) were established to mitigate the identified pollutions.	Yes

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		All the mitigation plans (objective) were established to mitigate the identified pollutions. For example, to construct biogas plant, optimize usage and reduce wastage of water, scheduled waste management, continue desilting/desludging on existing land application areas, reduce air particulate emissions and regular maintenance of septic tank.	
<b>4.5.4.3</b>	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.  - <b>Major compliance</b> -	Palm Oil Mill Effluent (POME) treated through anaerobic pond treatment system where the licensed limit for final discharge BOD is 500mg/l for latest compliance schedule (License No:001878), using land application method. Regular monitoring was conducted by the mill by taking the sample of wastewater in final discharge point.  Effluent final discharge analysis was monitored on monthly basis by accredited 3rd party laboratory. Based on the results, the mill has complied the regulated limit stipulated in the compliance schedule since the last assessment. These results were also communicated to the DOE through quarterly report.	Yes
<b>Criterion 4.5.5: Natural water resources</b>			
<b>4.5.5.1</b>	The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill’s current activities. c) Ways to optimize water and nutrient usage and reduce wastage ( <i>e.g.</i> having in place systems for re-use, night	Water management plan 2021, dated 15/04/2021 had been established with the main objective to maintain the quality and availability of natural water resources (surface and ground water). Raw water for mill processing and drinking water supply is sourced from Labuk River which is located nearby the mill. The consumption is closely monitored to avoid overuse.	Yes



	application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <b>- Major compliance -</b>		
<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>	NA as the mill does not discharge its POME into water course.	N/A
<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>	Genting Sabapalm Oil Mill has established Standard Operating Manual for monitoring and control of best practice implementation at the mill. Procedures of best practices were verified as below: <ol style="list-style-type: none"> <li>1. SOM-MGR-02: Reception</li> <li>2. SOM-PRD-03: Fruit handling</li> <li>3. SOM-PRD-04: Sterilizer</li> <li>4. SOM-PRD-06: Press</li> <li>5. SOM-PRD-08: Kernel Plant</li> <li>6. SOM-LAB-11: Laboratory</li> <li>7. SOM-LAB-15: Effluent</li> </ol>	Yes
<b>4.6.1.2</b>	All palm oil mills shall implement best practices. <b>- Major compliance -</b>	The monitoring of the mill best practices is done through supervision headed by an Engineer/Executives. All process parameters are documented and summarized in a daily report. Periodically, monitoring conducted by SVP and the mill management team is also practiced.	Yes
<b>Criterion 4.6.2: Economic and financial viability plan</b>			

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<p><b>4.6.2.1</b></p>	<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>Annual business plan is addressed in the form of annual budget and the projection for 4 years (2021-2024). It has the information about projected FFB received, CPO &amp; PK production, finance allocations for processing, administration, maintenance and capital expenditure.</p>	<p>Yes</p>
<p><b>Criterion 4.6.3: Transparent and fair price dealing</b></p>			
<p><b>4.6.3.1</b></p>	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p><b>- Major compliance -</b></p>	<p>Genting Sabapalm Oil Mill has received and processed FFB from owned supplying estates and external FFB suppliers.</p> <p>Seen the External Fresh Fruit Bunch (FFB) Procurement Policy Agreement signed by Senior Vice President, Marketing Palm Products dated 31/03/2021. Pricing mechanism was clearly outlined in Clause 3.0.</p> <p>Sample agreement sign by FFB supplier, A Rahman Harry bin Diong which signed on 09/07/2020. Interviewed with the supplier confirmed that he was briefed and understood the pricing mechanism.</p>	<p>Yes</p>
<p><b>4.6.3.2</b></p>	<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>Payment terms were clearly stated in the External Fresh Fruit Bunch (FFB) Procurement Policy Agreement where the suppliers will receive a final payment in the following month by the 15<sup>th</sup> day, for the FFB supplied in the preceding month based on the month-end price computed. Verified the payment advices as below:</p> <ul style="list-style-type: none"> <li>i. Transaction Ref.: 522414890100195 dated 11/03/2021</li> <li>ii. Transaction Ref.: 522798790100214 dated 13/04/2021</li> <li>iii. Transaction Ref.: 523143820100236 dated 10/05/2021</li> </ul> <p>Besides, interviewed with contractor and FFB supplier also confirmed that payment was made promptly.</p>	<p>Yes</p>

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<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> -	The contractors engaged by the mill management has signed agreement prior to provide services. There were clauses where the contractors shall ensure compliance with the requirements of RSPO, ISCC, MSPO and OSHA 1994.  Phone interviewed with the contractor confirmed that MSPO requirements were briefed by the management and he understood.	Yes
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor.  - <b>Major compliance</b> -	Sampled the contract agreements/ letter of award for services provider and external FFB suppliers as below: i. Agreement No.: GSOM CPO agmt-LK-2018 for CPO transport which valid until 31/08/2021. ii. Tender No.: CD/GPB/2018-14-GSOM-01 for construction of 9 blocks workers quarters.	Yes
<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> -	Clause 6 in CPO & PK Transport Agreement – Addendum on RSPO, MSPO, ISCC & OSHA 1994 clearly mentioned that the transporter shall ensure to provide cooperation and relevant access to the appointed CB into their respective operations, systems and any all information, when this is announced in advance. The contractor has acknowledged on the addendum.	Yes

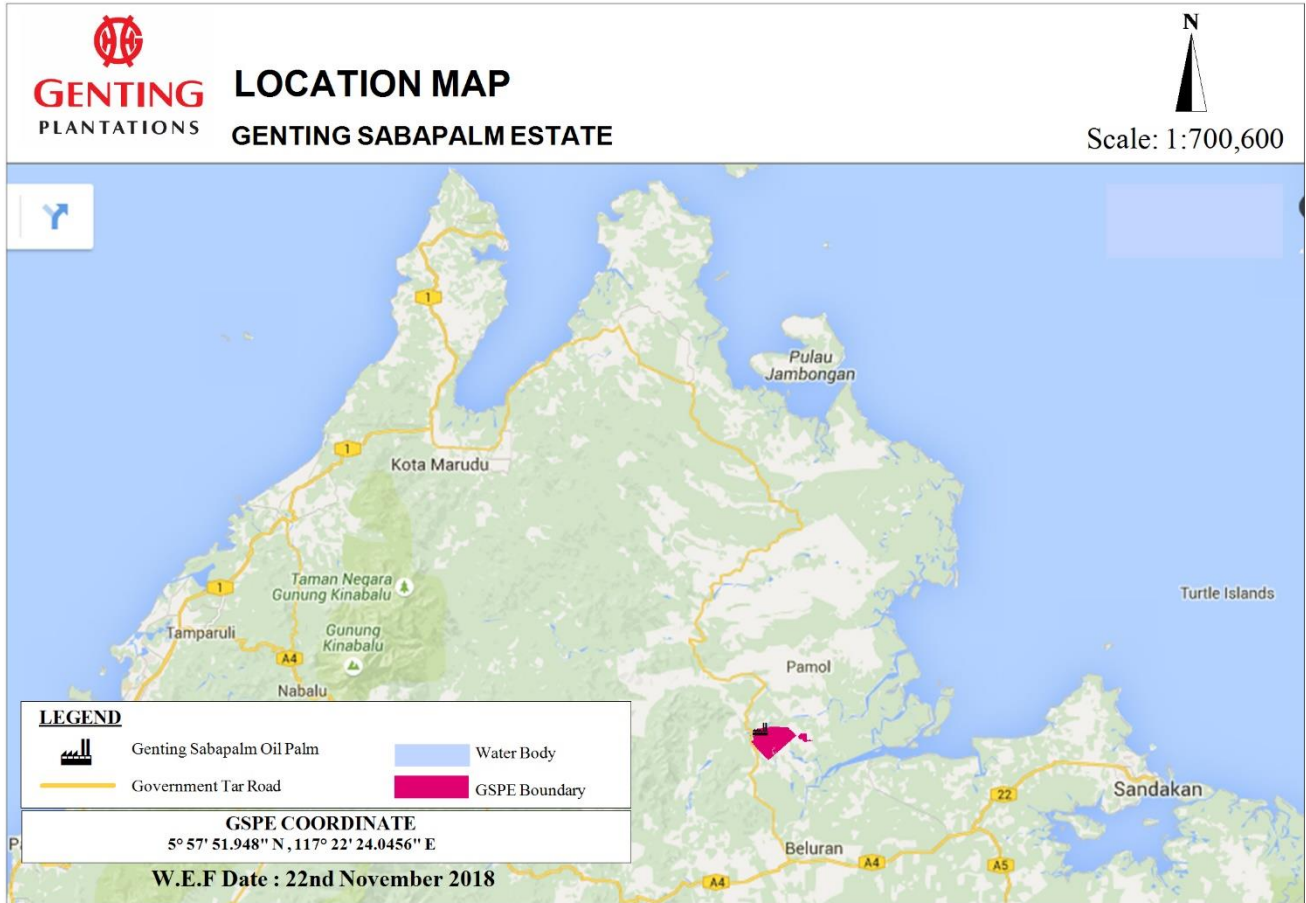
**Appendix B: List of Stakeholders Contacted**

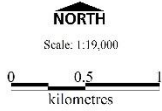
<p><b>Government Officer:</b>  Constable, Tagas-tagas Police Station</p>	<p><b>Community/neighbouring village:</b>  Representative of Kg. Tagas-tagas  Representative from smallholder</p>
<p><b>Suppliers/Contractors/Vendors:</b>  Contractors</p>	<p><b>Worker’s Representative/Gender Committee:</b>  Workers</p>

**Appendix C: Smallholder Member Details**

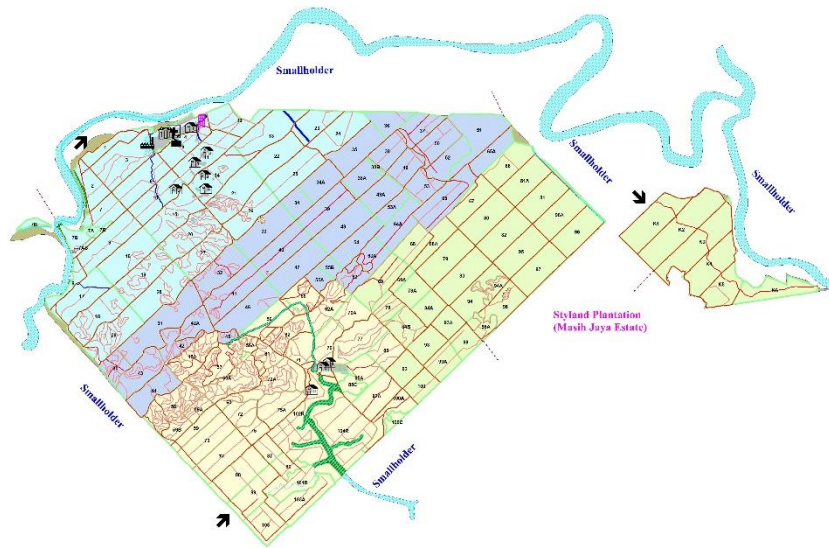
Not applicable.

**Appendix D: Location and Field Map**





**GPS MAP OF GENTING SABAPALM ESTATE**



**LEGEND**

- Boundary Stone
- Office
- Nursery
- Store
- Limestone
- Clinic
- Mill
- School/Temples
- Mosque
- Inlet of Major River
- Outlet of Major River
- Exit and Entrance
- Block Boundary
- Main Road
- Submain Road
- Stakeholder Boundary
- Water Body
- Riparian
- Stream
- Main Drain
- Building/Infrastructure
- Cattle Area
- Quarry
- Division Sapi
- Division Kwat
- Division Klagan
- Division Bangkawat
- Undeveloped Area



GSPL Coordinate : 5.965087 N, 117.374117 E  
 Projection : Longitude Latitude  
 Datum : WGS 84  
 Data Source : Field Survey Using Garmin  
 Prepared by :  
 Genting Plantations Research Centre Sabah (GPRCS)  
 Date Updated : 15 July 2015

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

**Appendix E: List of Abbreviations**

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GPB	Genting Plantations Berhad
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