

**MALAYSIAN SUSTAINABLE PALM OIL
3rd ANNUAL SURVEILLANCE ASSESSMENT (ASA3)
Public Summary Report**

GENTING PLANTATIONS BERHAD
Client Company Address: 10 th Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
Certification Unit: Genting Bukit Sembilan Estate
Date Final Report: 01/11/2021

Report prepared by:
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Report Number: SMO 3293249

Assessment Conducted by:
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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	Genting Plantations Berhad		
Mill/Estate	MPOB License No.	Expiry Date	
	508758102000	31/05//2022	
Address	Head Office: 10 th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia		
Certification Unit	Genting Bukit Sembilan Estate		
Contact Person Name	Mr. Arunan Kandasamy		
Website	http://www.gentingplantations.com/	E-mail	arunan.kandasamy@genting.com
Telephone	+603 2333 6401 (Head office)	Facsimile	+603 2333 6575 (Head office)

1.2 Certification Information			
Certificate Number	MSPO 682996		
Issue Date	28/01/2019	Expiry Date	27/01/2024
Scope of Certification	Production of Sustainable Oil Palm Fruits		
Standard	MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders		
Stage 1 Date	Exempted as GBSE is RSPO certified estate.		
Stage 2 / Initial Assessment Visit Date (IAV)	27/07/2018		
Continuous Assessment Visit Date (CAV) 1	24-25/07/2019		
Continuous Assessment Visit Date (CAV) 2	13/07/2020		
Continuous Assessment Visit Date (CAV) 3	13/07/2021 (Remote audit)		
Continuous Assessment Visit Date (CAV) 4	-		

Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE119-60196938	ISCC EU	ASG Cert GmbH	05/06/2022
RSPO 673953	RSPO Principles & Criteria of Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019	BSI Services Malaysia Sdn Bhd	17/09/2022

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1.3 Location of Certification Unit			
Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Genting Bukit Sembilan Estate	Kampung Batu Dua, 09300 Kuala Ketil, Kedah, Malaysia	5° 34' 32.55" N	100° 41' 9.89" E

1.4 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Bukit Sembilan Estate	1,180.06	2.15	51.95	1,234.16	95.62
Total	1,180.06	2.15	51.95	1,234.16	95.62

1.5 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Bukit Sembilan Estate	169.97	10.87	454.71	217.86	326.65	1,010.09	169.97
Total	169.97	10.87	454.71	217.86	326.65	1,010.09	169.97

1.6 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Jul 2020 - Jun 2021)	Actual (Jul 2020 - Jun 2021)	Forecast (Jan 2022 - Dec 2022)
Genting Bukit Sembilan Estate	23,500.00	21,640.835	27,350.00
Total	23,500.00	21,640.835	27,350.00

1.7 Uncertified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Jul 2020 - Jun 2021)	Actual (Jul 2020 - Jun 2021)	Forecast (Jan 2022 - Dec 2022)
N/A			
Total	N/A	N/A	N/A

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1.8 Certified Tonnage			
	Estimated (Jul 2020 - Jun 2021)	Actual (Jul 2020 - Jun 2021)	Forecast (Jan 2022 - Dec 2022)
Mill Capacity: N/A	FFB	FFB	FFB
	23,500.00	21,640.835	27,350.00
SCC Model: N/A	CPO (OER: %)	CPO (OER: %)	CPO (OER: %)
	N/A	N/A	N/A
	PK (KER: %)	PK (KER: %)	PK (KER: %)
	N/A	N/A	N/A

1.9 Actual CPO Sold Volume (mt)					
CPO (MT)	MSP0 Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
N/A					

1.10 Actual PK Sold Volume (mt)					
PK (MT)	MSP0 Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
N/A					

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 assessment was remotely conducted on 13/07/2021 due to the Pandemic COVID-19, Movement Control Order (MCO) imposed by the Malaysian Government. Among the ICT plan used were MS Teams, WhatsApp, Share-drive and email. The audit programme is included in Section 2.3. The approach to the audit was to treat the Genting Bukit Sembilan Estate as an MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities. The planned audit objectives have been achieved, there were no connectivity issues which adversely affected the audit.

The methodology for collection of objective evidence included interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 was 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 was 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.

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

Structured worker interviews with male and female workers and staff were held privately using ICT. Separate interviews were made to external stakeholders such as contractors/suppliers and villages via 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 are detailed in Section 3.2.

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

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

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

Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Genting Bukit Sembilan Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: July 12, 2022 - July 12, 2022

Total No. of Mandays: 4

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2.1 BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Valence Shem (VSH)	Team Leader	He holds Bachelor’s Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 14001, RSPO P&C, RSPO SCCS, MSPO and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012, MSPO Awareness Training in 2014 and ISO 45000 Lead Auditor Course in 2019. Able to communicate in Bahasa Malaysia and English. During this assessment, he covers the aspects on legal, mill best practices, good agriculture practice, occupational safety and health.
Hu Ning Shing (HNS)	Team Member	She holds Bachelor’s Degree in Science majoring in Applied Chemistry, graduated from University of Malaya in 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 had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she covers the aspects on legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English.

2.2 Accompanying Persons

No.	Name	Role
1	Mohd Nazib Hj. Marwan	Observer

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2.3 Assessment Plan

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

Date	Time	Subjects	VSH	HNS	ICT Planned
Wednesday 07/07/2021	1000	Preparatory/test call between client and BSI auditors Communication on document preparation for remote/ICT audit	✓ Room 1		MS Teams
Tuesday, 13/07/2021 Genting Bukit Sembilan Estate	0900-0930	Opening meeting • Opening presentation by audit team leader • Confirmation of assessment scope and finalize audit plan	✓ Room 1		MS Teams, share drive, WhatsApp, email, etc.
	0900-1030	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	✓ Room 1	-	
		Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	-	✓ Room 2	
	1030-1040	10-minute break			
	1040-1230	Continue with assessment and documentation review	✓ Room 1	✓ Room 2	
	1230-1330	Lunch break			
	1330-1500	Continue with assessment and documentation review	✓ Room 1	✓ Room 2	
	1500-1510	10-minute break			
	1510-1600	Continue with assessment and documentation review	✓ Room 1	✓ Room 2	
	1600-1630	Assessment team discussion and preparation of closing meeting	✓ Room 1		
1630-1700	Closing meeting	✓ Room 1			

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 this Annual Surveillance Assessment 3, there were zero (0) Major, zero (0) Minor nonconformities and zero (0) opportunity for improvement (OFI) raised.

Nonconformities:		
Ref: N/A	Area/Process:	Clause:
	Issue Date:	Due Date:
Requirements:		
Statement of Nonconformity:		
Objective Evidence:		
Corrections:		
Root cause analysis:		
Corrective Actions:		
Assessment Conclusion:		

Opportunity For Improvement		
Ref:	Area/Process:	Clause:
Objective Evidence:	N/A	

Noteworthy Positive Comments	
1	Good cooperation from the management team in assisting the assessment.
2	Good retrieval of relevant documents and records in providing evidence of compliance.
3	Positive feedback from employees especially the workers.

3.3 Status of Nonconformities Previously Identified and OFI

Major Nonconformities:		
Ref: 1933882-202007-M1	Area/Process: Genting Bukit Sembilan Estate	Clause: MSPO Part 3-4.3.1.1
	Issue Date: 15/07/2020	Closed Date: 6/9/2020
Requirements:	All operations are in compliance with the applicable local, state, national and ratified International laws and regulations.	
Statement of Nonconformity:	Sighted some applicable legal and other requirement inadequately implemented.	
Objective Evidence:	<ol style="list-style-type: none"> 1) Sighted Diesel storage in Paya Kamunting Div without license for buy and kept as per requirement Control Of Supplies Act 1961. 2) No record of Scheduled waste for PPE disposal (SW 410) on August 2019 however found issuance of rubber and glove for sprayer and manuring team on August 2019. This not comply with Safety and Health Manual (OM-GPB-02; 1/1/2010). The used PPE must bring for exchange with new PPE and the used PPE must be disposed as scheduled waste. 3) Worker Sinnamah A/P Jayabalan took maternity leave from Jan 2020 to Mar 2020. The maternity leave payment was paid out in 30/03/2020 as cheque voucher after the employee return to work. As according to Article 30 of MAPA/NUPW, maternity benefits shall apply the Employment Act 1955. As accordance to section 38 of Employment Act 1955, the maternity allowance shall be paid in the same manner as if such allowance were wages earned during such wage period as provided in section 19. 	
Corrections:	<ol style="list-style-type: none"> 1) To apply for diesel license for the outlying division (Paya Kamunting Div). 2) To update the Aug 2019 – SW 410 inventory accordingly. 3) Split the maternity payment into 2 months upon consulting with the worker. 	
Root cause analysis:	<ol style="list-style-type: none"> 1) The outlying division license was missed to be included in the LRR/license list, due to misunderstanding that the diesel license of main division (Bukit Sembilan Div) is adequate as long as the management complies with the total volume as stated in the license. 2) The used PPEs were stored in SW store but not recorded as SW due to staff's inadequate training/awareness that small quantities of SWs not required to be recorded on the same month. 3) Office personnel misunderstood that maternity leave can be paid (together for 2 months) upon completion of 2 months. Furthermore, the supporting documents were only received upon completion of 2 months. 	
Corrective Actions:	<ol style="list-style-type: none"> 1) To include all outlying division license in the LRR/license list, and continuously check and verify if any other 'individual division' legal compliances are required. 2) Provide training to the relevant staff to ensure all SWs are inventoried although small in quantity. 3) Update LRR accordingly. Provide training to the office personnel. 	
Assessment Conclusion:	Based on verification of documentations of Diesel license application and training record showed the corrective action plan has been implemented effectively, hence the	

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	major is closed on 6/9/2020. Continuous implementation will be further verified in the next assessment.
ASA3 Verification	<p>Evidence verified:</p> <ul style="list-style-type: none"> - Diesel permit no. K001302 for Paya Kamunting Div., valid until 02/03/2022 was maintain - Used PPE was disposed as scheduled wastes. Verified consignment note #2021020312YCT9KW, dated 26/01/2021 - There were no female workers under maternity leave since last audit. <p>There was no recurrence of non-conformity and corrective action has been continuously implemented. Thus, the Major NC remains closed.</p>

Minor Nonconformities:		
Ref: 1933882-202007-N1	Area/Process: Genting Bukit Sembilan Estate	Clause: MSPO Part 3- 4.5.6.2
	Issue Date: 15/07/2020	Closed Date: 13/07/2021
Requirements:	<p>If rare, threatened or endangered species or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <ul style="list-style-type: none"> a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. 	
Statement of Nonconformity:	The RTE management was not been include in HCV management plan.	
Objective Evidence:	The HCV management plan dated Jan 2020 only stated regarding to management on HCV 4.2 and HCV 6 however did not include RTE management and monitoring in plan.	
Corrections:	<p>To update the HCV management plan to include RTE management and monitoring plan.</p> <p>Provide training to the relevant workers and field staff.</p>	
Root cause analysis:	Misunderstood that RTE management/ monitoring plan no longer required after re-classification of the forest strip from HCV 1.4 to non-HCV (conservation set aside) in 2018.	
Corrective Actions:	<p>To include the RTE species monitoring/checklist into the annual sustainability programme.</p> <p>To include training on RTE species monitoring into the estate's annual training programme.</p>	
Assessment Conclusion:	The CAP was accepted on 19/8/2020 and Implementation of corrective action will be verified on the next surveillance.	
ASA3 Verification	<p>Evidence verified:</p> <ul style="list-style-type: none"> - The utilization of HCV monitoring/checklist where the sighting of RTE species has been included. - Training records on HCV & RTE management plan dated 18/03/2021 that shows relevant personnel have been trained on RTE identification and monitoring. 	

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	The evidence of correction and corrective action implementation were found to be adequate to close the Minor NC. Continuous implementation shall be carried out in the next assessment visit.
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Minor Nonconformities:		
Ref: 1933882-202007-N2	Area/Process: Genting Bukit Sembilan Estate	Clause: MSPO Part 3- 4.6.4.3
	Issue Date: 15/07/2020	Closed Date: 13/07/2021
Requirements:	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.	
Statement of Nonconformity:	The agreement has not included the requirement to allowed approved MSPO auditors to verify assessment through a physical inspection	
Objective Evidence:	The sample contract agreement (NAG Supply and Service and J.M. Enterprise) has not included the terms that an approved MSPO auditor have the access to conduct a physical inspection is required.	
Corrections:	To brief the contractors and get them acknowledge on the requirement.	
Root cause analysis:	Time constraint to get the contractors acknowledge on the requirement as the new addendum (on the said requirement) was issued only on 17/7/2020.	
Corrective Actions:	To update the contractor's agreement in Jan 2021.	
Assessment Conclusion:	The CAP was accepted on 19/8/2020 and Implementation of corrective action will be verified on the next surveillance.	
ASA3 Verification	<p>Seen the Agreement No.: GBSE/TR/21/01/01 which valid until 31/12/2021 for JM Enterprise found that under Clause 3.5 (iv), the contractor shall ensure to provide cooperation and relevant access to the appointed Certification Bodies (Sustainability Auditors) into their respective operations, systems, and any and all information, when this is announced in advance. The contractor has acknowledged after the briefing done. Interviewed with the contractors that they have been briefed on the agreement prior to sign.</p> <p>The implementation of corrective action was effective and thus, the minor NC was closed on 13/07/2021.</p>	

Opportunity For Improvement		
Ref:1933882-202007-I1	Area/Process: Genting Bukit Sembilan Estate	Clause: MSPO Part 3- 4.3.2.2
Objective Evidence:	The land statement for Paya Kamunting division shows total area of 436.18ha need to follow the total land title is 435.7045ha.	
ASA3 Verification:	The Survey Department is in the process of resurveying and update the data in legal document once finalize. This is expected to be completed by this year due to Movement Control Order. This will be further verified during next assessment. Thus, the OFI was closed on 13/07/2021.	

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Opportunity For Improvement		
Ref: 1933882-202007-I2	Area/Process: Genting Bukit Sembilan Estate	Clause: MSPO Part 3- 4.1.2.2
Objective Evidence:	The closure of the internal audit finding can be improved to include more robust actions other than providing awareness training.	
ASA3 Verification:	Internal audit was conducted on 28-29/06/2021 and no finding was raised. Nonetheless, based on interview with the internal auditor, he understood what it takes to have a better corrective action apart from providing awareness training, therefore the finding would be closed more effectively.	

3.4 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1664508-201806-M1	Major	27/07/2018	Closed out on 26/09/2018
1664508-201806-M2	Major	27/07/2018	Closed out on 26/09/2018
1933882-202007-M1	Major	15/07/2020	Closed out on 06/09/2020
1933882-202007-N1	Minor	15/07/2020	Closed out on 13/07/2021
1933882-202007-N2	Minor	15/07/2020	Closed out on 13/07/2021



3.5 Issues Raised by Stakeholders

IS #	Description
1	Issues: Contractors and Sub-contractors – They have signed agreement prior to work in Genting Bukit Sembilan Estate. They understood the terms and conditions stated in the agreement. They were briefed on the MSPO requirements and payment terms. They informed that the payment was made promptly.
	Management Responses: The management will ensure the payment will make accordingly.
	Audit Team Findings: No other issue.
2	Issues: Local Community Representative (Kg. Hutan Terabak) – He informed that no land encroachment by Genting Bukit Sembilan Estate. They have good relationship with the management. For eg: the management will support their activity such as <i>gotong-royong</i> by supplied workers to help out. He understood the complaint mechanism as well.
	Management Responses: The management will continue to support whenever required.
	Audit Team Findings: No further issue.
3	Issues: NUPW Representatives – They informed that they were elected by the workers. No issue was raised by the workers at this moment. The management was treated everyone equally without discrimination. Free

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	<p>housing and subsidized of water and electricity was provided to them. Their wages are achieved Minimum Wage Order 2020.</p> <p>Management Responses: The management will ensure compliance of legal requirements especially on Employment Act 1955.</p> <p>Audit Team Findings: No other issue.</p>
4	<p>Issues: Smallholders – They informed that no land encroachment by the management. They have been invited to attend meeting in the estate and understood the complaint mechanism. They have good relationship with the management and workers. Demarcation of the boundary by reserved road.</p> <p>Management Responses: The management will continue to maintain good relationship with the smallholders.</p> <p>Audit Team Findings: No other issue.</p>
5	<p>Issues: Female Workers’ Representative – She informed that no case of sexual harassment and violence reported. All the female workers are treated equally by providing equal job opportunity. Overtime was offered on voluntarily basis.</p> <p>Management Responses: The management will continue to monitor if there is any case.</p> <p>Audit Team Findings: No other issue.</p>

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment Genting Bukit Sembilan Estate Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Genting Bukit Sembilan Estate Certification Unit is approved and/or continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Arunan Kandasamy	Name: Valence Shem
Company name: Genting Plantations Berhad	Company name: BSI Services Malaysia Sdn Bhd
Title: SVP - Plantation (Malaysia)	Title: Lead Auditor
Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 	Signature: 
Date: 20/10/21	Date: 13/10/2021

Appendix A: Summary of the findings by Principles and Criteria

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	Genting 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 08/02/2021 to the workers during morning muster. Seen the training attendance list.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	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.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Internal audit plan was established on 28/06/2021 to carry internal audit for RSPO & MSPO for Genting Bukit Sembilan Estate. The date of audit was planned on 28-29/06/2021 conducted by Mr. Sivaji. Seen the MSPO Internal Audit Report where no finding was raised during the internal audit.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of	Genting Plantations Berhad has developed Sustainability Internal Audit procedure with Doc. No.: SMP-GPB-03, Rev. 05 dated September 2020	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	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 28-29/06/2021 with no non-conformity was raised during the audit. This audit was carried out via remotely due to travel restriction by the government.	
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	The Estate Manager, Mr. Azizi bin Aziz has reviewed the Internal Audit Report and acknowledged on 29/06/2021.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	RSPO, MSPO & ISCC Management Review Meeting was conducted on 02/07/2021 for Genting Bukit Sembilan Estate via Microsoft Teams. The meeting was chaired by Estate Manager and attended by relevant personnel from estate and sustainability team. Meeting minutes was available. Agenda of the meeting was clearly outlined in the minutes.	Complied
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -	Continuous Improvement Plan dated 26/06/2021 was available for verification. Generally, among the plans established were: <ul style="list-style-type: none"> - Optimisation of yield - Reduction in use of certain pesticides - Management of environmental aspects - Wastes reduction 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		The plans have the information about the possible issues, action to be taken, person in charge, time frame and status of action.	
4.1.4.2	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. - Major compliance -	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.	Complied
4.1.4.3	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. - Major compliance -	NA as no new technology adopted.	Not applicable
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance -	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 & grievances, environmental and biodiversity concerns, social issue and suggestions for improvement. Briefing of the policy was conducted on 08/02/2021 to the workers during morning muster. Seen the training attendance list.	Complied

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		As for instruction from the top management, all stakeholder meetings (both internal & external) shall be postponed until further notice due to pandemic of COVID-19. Seen the email correspondence dated 26/10/2020 by Sustainability Manager. Therefore, letter and form to obtain stakeholder's feedback and suggestion will be implemented to ensure continuous engagement with the stakeholders. GBSE has distributed the Stakeholder – Suggestion/ Complaints/ Feedback Form to stakeholders such as NUPW Kedah, JTK Officer and local communities. No issue was raised by the stakeholders as reviewed the responded form.	
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance -	Genting Bukit Sembilan Estate has issued the list of documents that could be requested by the stakeholders to all the relevant stakeholders on 04/01/2021. The stakeholders are required to register in Enquiry Register Book prior to access to the documents. The list of documents not limited to: Land title Policies Reports – EAI, SIA, HCV and audit reports Management plans Procedures And etc.	Complied
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	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	Complied

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		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.	
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance -	Estate Manager has been appointed by Senior Manager – Operations (WM) to be the management representative for RSPO, MSPO & ISCC related matters. Appointment letter dated 01/02/2021 was sighted.	Complied
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	List of Stakeholders as at July 2021 was developed where internal and external stakeholders were included in the list. Nominated representative with the contact details were clearly stated in the list. Stakeholders such as local communities, government authorities, neighbouring smallholders, schools, workers’ representatives, contractors and suppliers were included. As for instruction from the top management, all stakeholder meetings (both internal & external) shall be postponed until further notice due to pandemic of COVID-19. Seen the email correspondence dated 26/10/2020 by Sustainability Manager. Therefore, letter and form to obtain stakeholder’s feedback and suggestion will be implemented to ensure continuous engagement with the stakeholders. GBSE has distributed the Stakeholder – Suggestion/ Complaints/ Feedback Form to stakeholders such as NUPW Kedah, JTK Officer and local communities. No issue was raised by the stakeholders as reviewed the responded form. Internal stakeholder meeting was held on 26/04/2021 for contractors and 27/04/2021 for workers. Seen the meeting minutes for both meetings. There was no issue raised during the meeting.	Complied

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Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance -	The traceability implementation is addressed in a procedure [Sustainability Management Procedure Manual (SMPM)], Traceability (Estate) [SMP-GPB-09, rev. 05, dated 07/09/2020].	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	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).	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	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"> • Harvesters & loaders • Lorry/tractor driver • Weighbridge operator (if any) • Dispatch staff or dispatch clerk • Assistant Manager/Estate Manager • Sustainability Dept. 	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	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"> • Estate’s FFB dispatch advice • Weighbridge ticket Based on the estate’s crop production records, for the period of Jul 2020 to Jun 2021, the estate has delivered 21,640.84 mt of FFB to three mills.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Only one of the three mills is MSPO certified. Nonetheless, the estate sold its FFB as non-certified.	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	The estate monitored compliance with applicable local, state, national and ratified international laws and regulations through evaluation of compliance. Among the evidence of legal compliance verified were as follows: 1) MPOB License # 508758102000 and 508592902000, both valid until 31/05/2022 2) Certificate of fitness of air compressor, #KD PMT 4993, valid until 28/12/2021 3) Certificate of fitness of air compressor, # KD PMT 4621, valid until 02/06/2022 4) Permit to store diesel, #001302, quantity: 200 lt, valid until 02/03/2022 5) Perakuan Penentuan Timbang & Sukat, #MCM1.4K Q 0006820, valid until 17/02/2022 6) Perakuan Penentuan Timbang & Sukat, #2.1K Q 015944/MCM0261795, valid until 13/08/2021	Complied
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	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.	Complied

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4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	Addressed in Legal Requirement Register [Ref.: doc no. SMP-GPB-22 rev. 09 dated 08/09/2020]. The process of law changes as follows: i) Notification of changes from various source of information i.e. Lawnet, government gazette and sustainability team based in the Sandakan HQ. ii) Monitoring for changes in the Law iii) Clarification and review on the changes iv) Updating of the Legal register administered internally v) Notification to the operating units and/or the relevant person in charge The established legal register has incorporated the latest changes of law.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance -	The Chief Clerk had been assigned as the PIC for updating changes in law [ref.: appointment letter dated 04/01/2021]. Checking of status compliance was regularly done through the utilisation of form no. SMP-GPB-22 by the management. The latest period under review was Jan-Apr2021.	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	There was no evidence to show that oil palm cultivation activities Genting Bukit Sembilan Estate had diminished the land use rights of others. Verified documents to show legal ownership of its land by Genting Plantations Berhad.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.	Sampled the land titles shown that the legal ownership of the company. Sample of land title as below: i. Title No.: 199826, Lot No.: 60122, 379.3 ha	Complied

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	- Major compliance -	ii. Title No.: 36098, Lot No.: 54, 136.7002 ha	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The legal boundary for estate visited was clearly demarcated with legal boundary peg. Seen the photo evident of the legal boundary peg demarcate the boundary. Boundary map/ GPS map with scale of 1:15,500 was sighted where location of neighbouring communities was demarcated in the map.	Complied
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute in the Genting Bukit Sembilan 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.	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land or negotiated agreements within the Genting Bukit Sembilan Estate’s land area.	Not applicable
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	The right to use the land is not disputed and there was no customary land within the Genting Bukit Sembilan Estate.	Not applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There is no land dispute or customary rights issues in the estate.	Not applicable

Criterion / Indicator	Assessment Findings	Compliance	
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	<p>There was a Social Impact Assessment (SIA) & Human Rights Impact Assessment (HRIM) conducted on 2-5/07/2019 for Genting Bukit Sembilan Estate by Sustainability Department. The methodology of the assessment was through consultation with stakeholders and reviewed documents. Stakeholders such as local communities, school’s representative, contractors, local authorities, smallholders and workers were involved in the assessment.</p> <p>Social Management and Monitoring Plan of Genting Bukit Sembilan Estate last updated on 03/07/2021 was sighted. The sampled issue as below:</p> <ol style="list-style-type: none"> Issue: All workers addressed the concern of not having enough streetlight for Main Division & PKD Division. Action plan: To budget for street lighting in year 2020 Status: The management has received quotation from contractor on November 2020 and appointed the contractor to install the streetlight. However, due to pandemic COVID-19, the installation process has been postponed. The management is expected to be completed by this year. 	Complied
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	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 & grievances involved internal	Complied

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		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.	
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	The estate has Complaint Book to record any complaint or grievance received. Sampled of the records of complaint as below: 1. Ref No.: 138 dated 14/08/2020 Issue: Doors in toilet were broken. Action: The management has instructed the person in charge to replace immediately. Seen the photo evident of the doors been replaced on 17/08/2020. 2. Ref No.: 139 dated 12/12/2020 Issue: Water entered to house due to desilting of trenches behind the house by management. Action: The management informed the JCB to rectify. Status: Seen the photo evidence of the trenches has been deepen and channel the water out to other area on 12/12/2020. All the complainants have acknowledged after action has been taken by management and issue resolved.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	The Enquiry Register Book and Complaint Book was located in front of the office entrance as verified through photo evident. Interviewed with workers and stakeholders confirmed that the availability of the Enquiry Register Book and Complaint Book.	Complied

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4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	The workers were briefed on the complaints & grievances procedure on 22/02/2021 and 30/04/2021 during morning muster. The contractors have been briefed on the procedure during stakeholder meeting conducted on 26/04/2021. Phone interviewed with the workers and stakeholders confirmed that they are aware of the complaint procedure.	Complied
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	Records of complaint or grievance for July 2019 was available for review during the time of audit.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	Genting Bukit Sembilan Estate has carried out corporate social responsibilities to the local communities such as provide job opportunities to local people. Besides, they fixed the cattle grid which became main road for village in Kok Seng Estate. Seen the photo evident. The estate management also provided chicken to the workers during festival season. Phone interviewed with the local community confirmed that the management has supported their <i>gotong-royong</i> activity by supplied workers to help them out.	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	The Occupational Safety and Health Policy had been established, signed by President & Chief Operating Officer on 01/07/2018. The policy was communicated to the employees through various methods such as training, morning muster, and display on notice boards to name a few.	Complied
4.4.4.2	The occupational safety and health plan shall cover the following:	a) The Occupational Safety and Health Policy had been established, signed by President & Chief Operating Officer on 1st July 2018. The	Complied

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<p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risks of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied <p>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).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the</p>	<p>policy was communicated to the employees through various methods such as training, morning muster, and display on notice boards to name a few.</p> <p>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 April 2017. The report [#JKKP HIE 127/171-2(154)-2017/003] was available for verification.</p> <p>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 verified, for example:</p> <ul style="list-style-type: none"> - Training on spraying & manuring operation, technique & close supervision dated 08/04/2021 - Chemical handling, pre-mix, PPE & triple rinsing by supplier dated 20/04/2021 - PPE training for sprayer, pre-mix, storekeeper, manuring, driver, harvester & general worker dated 17/06/2021 <p>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.</p> <p>e) SOP for handling chemical management was addressed in a few procedures such as SOP for spraying and Highly Toxic Pesticides procedure. The procedure outlines the handling of chemicals in accordance to the regulation.</p>	

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	<p>concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>f) SHC Organization – Chairman: Estate Manager, SHC secretary: Assistant Manager. Organization chart of OSH committee was available and effective from March 2021.</p> <p>g) Records were available confirming that quarterly OSH meetings had been held by the estate. However, due to the MCO, there has been no committee meeting conducted since the last audit except for the ad-hoc due to occupational accident in Dec 2020.</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 9 units of first aid kit provided at various workstations at the estate such as workshop, store, harvesting gangs, maintenance gangs and office. There are 9 trained first aider. Based on records, the last training on first aid was conducted on 08/04/2021.</p> <p>j) 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 addressing the accident causes based on investigation.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>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 law. Briefing of the policy was conducted on 08/02/2021 to the workers during morning muster. Seen the training attendance list.</p>	Complied

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<p>4.4.5.2 The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>Genting Plantations Berhad has established Social Policy dated 14/09/2020 signed by President & 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>Complied</p>
<p>4.4.5.3 Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>There were employment contracts for staffs and workers. Pay and conditions are documented and achieved the Minimum Wage Order 2020. Sampled of 10 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 10 payslips for November 2020, April 2021 and June 2021 found that all the workers were paid accordingly.</p>	<p>Complied</p>
<p>4.4.5.4 Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>There were two FFB transporters engaged by the estate. 1 transporter has sub-contracted the transporting activity to sub-contractor and seen the sub-contractor's agreement. Phone interviewed with the main contractor and sub-contractor confirmed that the main contractor has paid according to the agreed rate. The other transporter is family business run by father and sons.</p>	<p>Complied</p>
<p>4.4.5.5 The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The estate has recorded the biodata of the workers in Labour Registration Record Card. Total 10 samples of Labour Registration Record Card were sighted where information such as full name, gender, date of birth, date of engaged and job description was included. Besides, the information could be verified in Lintramax system as well.</p>	<p>Complied</p>
<p>4.4.5.6 All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment</p>	<p>All the workers are employed under direct employment. 10 employments contracts were sampled and found that terms and conditions of the</p>	<p>Complied</p>

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	contract is available for each and every employee indicated in the employment records. - Major compliance -	employment were clearly stated in the contract and signed by the workers.	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. - Major compliance -	The estate management monitor the attendance and working time through checkroll book. Overtimes will be recorded in Overtime Record Form which is transparent to workers and the number of overtimes will be shown in the payslips.	Complied
4.4.5.8	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. - Major compliance -	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 Overtime Record Form.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Wages and overtime were paid according to Employment Act 1955 and Minimum Wage Order 2020 of the workers. Total hours of overtime and daily attendance has recorded in the checkroll book and Overtime Record Form.	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - Minor compliance -	All the workers are provided with free medical facilities. Free housing facilities were provided to all the workers and their families. Benefits such as service allowance of RM 400 was given to the workers who continue the service with the company.	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in	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 on monthly basis by Field Supervisor and twice a month by VMO. The last inspection was	Complied

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	<p>compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p>- Major compliance -</p>	<p>conducted on 25/06/2021 by VMO and records of the inspection were kept available.</p>	
4.4.5.12	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>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. Besides, Sexual Harassment Policy was developed on 03/08/2009 to strive for a harassment-free environment and avoid behaviour that may create an atmosphere of hostility and intimidation of any kind at workplace. Briefing of the policy was conducted on 08/02/2021 to the workers during morning muster. Seen the training attendance list.</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 estate and seen the last meeting was conducted on 01/04/2021. The frequency of the meeting is at least once every 6 months as per guideline of <i>Penubuhan Jawatankuasa Wanita dan Kanak-kanak</i> developed by Sustainability Department dated 2010. Due to pandemic of COVID-19, there was only once meeting conducted April 2020. There was no case of sexual harassment and violence reported. Briefing of the sexual harassment policy was conducted during the meeting as well.</p>	Complied
4.4.5.13	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to</p>	<p>Genting Plantations Berhad has established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where the company</p>	Complied

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	<p>facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>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 08/02/2021 to the workers during morning muster. Seen the training attendance list.</p> <p>Workers Committee was established in the estate and the last meeting was conducted on 08/04/2021 with the representatives from different nationalities and division. There was no issue raised during the meeting as verified in the meeting minutes.</p>											
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not expose to hazardous working conditions.</p> <p>- Major compliance -</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>	Complied										
Criterion 4.4.6: Training and competency													
4.4.6.1	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p>- Major compliance -</p>	<p>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 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>Understanding & awareness of Group Policies</td> <td>08/02/2021</td> </tr> <tr> <td>Training on RSPO, MSPO & ISCC P&C</td> <td>16-17/03/2021</td> </tr> <tr> <td>Training on traceability & supply chain</td> <td>18/03/2021</td> </tr> <tr> <td>Training on GHG dated</td> <td>17-18/03/2021</td> </tr> </tbody> </table>	Trainings	Date	Understanding & awareness of Group Policies	08/02/2021	Training on RSPO, MSPO & ISCC P&C	16-17/03/2021	Training on traceability & supply chain	18/03/2021	Training on GHG dated	17-18/03/2021	Complied
Trainings	Date												
Understanding & awareness of Group Policies	08/02/2021												
Training on RSPO, MSPO & ISCC P&C	16-17/03/2021												
Training on traceability & supply chain	18/03/2021												
Training on GHG dated	17-18/03/2021												

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Criterion / Indicator		Assessment Findings		Compliance
		Environmental responsibility & biodiversity, HCV & RTE area management, wildlife protection	01/04/2021	
		Riparian buffer zone management for sprayer & manuring dated	01/04/2021	
		Triple rinsing & puncturing	19/03/2021	
		Wastes management (SW, domestic waste, recyclable waste and zero burning)	19/03/2021	
		Training on spraying & manuring operation, technique & close supervision	08/04/2021	
		PPE training for sprayer, pre-mix, storekeeper, manuring, driver, harvester & general worker	17/06/2021	
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	Training needs and training programme for 2021 was available for verification. It has the information about types of training and targeted audience.		Complied
4.4.6.3	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure. - Minor compliance -	This is also addressed in the training needs and training programme for 2021 as mentioned in Indicator 4.4.6.2.		Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services				
Criterion 4.5.1: Environmental Management Plan				

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Criterion / Indicator		Assessment Findings	Compliance
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	Environmental Policy 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 16/03/2021 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.	Complied
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. - Major compliance -	Environmental 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, and display on notice boards to name a few. Environmental improvement and management plan had been established by the estate (dated 16/03/2021) 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. Environmental aspect and impact evaluation register had been established which includes all the estate's activities such as FFB harvesting & evacuation, workshop, field maintenance, replanting, line-site, and administration. The register was last reviewed in January 2021.	Complied
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.	Environmental improvement and management plan had been established by the estate (dated 16/03/2021) which includes the air pollution, water pollution from estate operations, water pollution from line-site and landfill area, soil erosion, greenhouse gas emissions. All	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>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 & evacuation, workshop, field maintenance, replanting, line-site, and administration. The register was last reviewed in January 2021.</p> <p>The environmental management plan is established in several forms such as:</p> <ul style="list-style-type: none"> - Pollution prevention plan - Waste management plan - Water management plan - Management plan to improve efficiency of diesel usage and to optimise renewal energy - Significant pollutants and GHG emission – reduction/minimisation plan 	
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>Environmental improvement and management plan had been established by the estate (dated 18/02/2021) 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</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		harvesting & evacuation, workshop, field maintenance, replanting, line-site, and administration. The register was last reviewed in January 2021.	
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	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, and display on notice boards to name a few.	Complied
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	This is addressed by Environment Committee meeting. The last meeting was conducted on 06/03/2021 and minutes of meeting was available for verification. Among the agenda discussed were: <ul style="list-style-type: none"> - Zero burning policy - HCV - Riparian buffer zone - Illegal hunting, fishing & trapping - River pollution - Dust - Water & wastes management 	Complied
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the	This is addressed in Management plan to improve efficiency of diesel usage and to optimise renewal energy. Monthly records on energy consumption for non-renewable sources were kept and documented. Based on the records, the diesel consumption is as follows:	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	base period. - Major compliance -	<ul style="list-style-type: none"> 2021 – 0.99 lt/mt FFB as at Jun 2020 – 3.01 lt/mt FFB 	
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel to determine energy efficiency of their operations (machineries and vehicle), was available in the estate annual budget.	Complied
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	There was no renewable energy applied by the estate.	Not applicable
Criterion 4.5.3: Waste management and disposal			
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Identification of waste products and sources of pollution is documented in Waste Management Plan. The wastes were categorised to scheduled wastes, domestic wastes and recyclable wastes. The waste management plan has the information about method of disposal, monitoring & action plan, data required, responsible person and status of implementation.	Complied
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 - Major compliance -	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: 1. Disposal as scheduled waste by DOE approved contractor 2. Disposal of domestic wastes at designated landfill area 3. Segregation of waste and store at designated recyclable waste area.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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. - Major compliance -	Addressed in the Scheduled Waste Management procedure [SMP-GPB-11, rev. 02, dated 11/08/2020. Scheduled wastes were disposed through licensed vendor and consignment notes as follows were verified: #2021020312YCT9KW, dated 26/01/2021, SW410 #20210203125XK916, dated 26/01/2021, SW305 #2021020312AFWG4K, dated 26/01/2021, SW312 #2021020312GUF7AP, dated 26/01/2021, SW409	Complied
4.5.3.4	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. - Major compliance -	Empty pesticides containers were disposed through authorised collector after the process of triple rinsing has been undergone.	Complied
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	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.	Complied
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	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, replanting, line-site, and administration. The register was last reviewed in January 2021.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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>	<p>Environmental improvement and management plan had been established by the estate (dated 18/02/2021) 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 & evacuation, workshop, field maintenance, replanting, line-site, and administration. The register was last reviewed in January 2021.</p>	Complied
Criterion 4.5.5: Natural water resources			
4.5.5.1	<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"> a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities. 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.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before 	<p>Water management plan 2021, dated 07/04/2021 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"> i) Efficient usage of water source (i.e. public domain) ii) Renewable water source e.g. rainwater harvesting iii) Avoidance of surface and ground water contamination 	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>		
4.5.5.2	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p>- Minor compliance -</p>	There is no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	Complied
4.5.5.3	<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>- Minor compliance -</p>	Among the water harvesting methods implemented by the management to conserve water are collecting rainwater through rain gutter and water catchment pond for irrigation project.	Complied
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			
4.5.6.1	<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>Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or</p>	<p>The HCV assessment contained information of both planted area and relevant wider landscape-level, and result of HCV was obtained. There was one report prepared by the HCV assessors (conducted in Feb-Mar 2010) covering the estate. The report of assessment contained in "High Conservation Value (HCV) Final Report (Northern Region). The following aspects were assessed:</p> <p>Area of HCV-Shared management of forest reserve and boundary areas/buffer zones</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>endangered species), that could be significantly affected by the grower(s) activities.</p> <p>- Major compliance -</p>	<p>The presence of large mammals and birds and how they are protected from poaches.</p> <p>IPM: use of plants to attract predators to control bagworms & barn owls for rat management and success</p> <p>Drainage and the conditions. Determining the presence of fishes as a bio-indicator of water health.</p>	
4.5.6.2	<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>- Major compliance -</p>	<p>The assessment contained information of both planted area and relevant wider landscape-level, and result of HCV was obtained. Environmental responsibility & biodiversity, HCV & RTE area management, wildlife protection training was last conducted on 01/04/2021. Daily morning briefing includes reminder to workers regarding the HCV and species protection. Apart from that, signage about RTE species and hunting restriction were also planted at strategic places in the estate.</p>	Complied
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>The HCV management plan includes:</p> <ul style="list-style-type: none"> - To ensure no agrichemical activities carried out near the riparian area. - To cover any bare soil with planting of vetiver grasses, groundcovers and to reduce soil erosion. - Establishment of safety/awareness signages - To give briefing during muster to include HCV related. - HCV awareness training for estate management. 	Complied
<p>Criterion 4.5.7: Zero burning practices</p>			

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Criterion / Indicator		Assessment Findings	Compliance
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -	There was no use of fire for land preparation for replanting. Domestic wastes were disposed at designated landfill.	Complied
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance -	No special approval granted from DOE as to date since there was no risk of disease at GJBE.	Not applicable
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	No application of controlled burning.	Not applicable
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	All standing biomass were cut and stacked neatly in rows away from harvesting path as described in the OPM 01 Land Clearing, Preparation and Legume Covers Establishment.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	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	Complied

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Criterion / Indicator		Assessment Findings	Compliance						
		described comprehensively in the Standard operating procedure (SOP) and pictorial SOP. The estate implemented through its daily operations.							
4.6.1.2	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. - Major compliance -	Generally, the soil conservation measures implemented at the sloping land are construction of terrace, establishment of cover crop and construction of road side drain. This is guided by the following procedures: <ul style="list-style-type: none"> • OPM 4: Soil conservation and terracing (rev 2013) • Steep land Management SMP –GPB-10 Nonetheless, based on terrain maps, the estate terrain is generally flat to undulating.	Complied						
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	Estate Maps where the following details were available for reference: <ol style="list-style-type: none"> a) Soil Map b) Slope class map c) Blocking map 	Complied						
Criterion 4.6.2: Economic and financial viability plan									
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	Annual business plan is addressed in the form of annual budget and the projection for 5 years (2021-2025). It has the information about projected FFB production, finance allocations for operations such as harvesting and field upkeep, administration and capital expenditure.	Complied						
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance -	Replanting program has been established with 5 years projection which details are as follows: <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Year</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>13.67</td> </tr> <tr> <td>2022</td> <td>117.58</td> </tr> </tbody> </table>	Year	Ha	2021	13.67	2022	117.58	Complied
Year	Ha								
2021	13.67								
2022	117.58								

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Criterion / Indicator		Assessment Findings		Compliance
		2023	90.19	
		2024	116.71	
		2025	96.46	
4.6.2.3	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment <p>- Major compliance -</p>	<p>Verification of the 2021 budget showed that the information such as crop projection, cost of production and return of investment was available.</p>		Complied
4.6.2.4	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p> <p>- Major compliance -</p>	<p>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.</p>		Complied
Criterion 4.6.3: Transparent and fair price dealing				
4.6.3.1	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p>- Major compliance -</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"> i. Agreement No.: GBSE/TR/21/01/01 which valid until 31/12/2021. ii. Agreement No.: GBSE/TR/21/01/05 which valid until 31/12/2021. <p>The payment shall be made within 30 days from the date of issuance of Schedule of Work Completed.</p>		Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Payment rate was clearly stated in Schedule 2 of the agreement. Payment terms was within 30 days from the date of issuance of Schedule of Work Completed. Verified the payment advices as below: i. INV# TPT/3/2021 dated 01/04/2021; Transaction Ref.: 522870510100042 dated 19/04/2021 ii. INV# TRP(P)032/2021 dated 03/04/2021; Transaction Ref.: 522870510100038 dated 19/04/2021 Besides, interviewed with contractor and FFB supplier also confirmed that payment was made promptly.	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	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 and MSPO. Phone interviewed with the contractor confirmed that MSPO requirements were briefed by the management and he understood.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	The estate has engaged FFB transporter to transport FFB from estate to mill. Sampled of the agreement as below: i. Agreement No.: GBSE/TR/21/01/01 which valid until 31/12/2021. ii. Agreement No.: GBSE/TR/21/01/05 which valid until 31/12/2021.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	As refer to the agreement under Clause 3.5 (iv), the contractor shall ensure to provide cooperation and relevant access to the appointed Certification Bodies (Sustainability Auditors) into their respective operations, systems, and any and all information, when this is announced in advance.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	Control points applicable being observed by estate management as per sighted sample agreements. Evidence of agreed contracts are available.	Complied
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			
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. - Major compliance -	NA as no development of new planting.	Not applicable
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia’s National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance -	NA as no development of new planting.	Not applicable
Criterion 4.7.2: Peat Land			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice.	NA as no development of new planting.	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
- Major compliance -			
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	NA as no development of new planting.	Not applicable
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	NA as no development of new planting.	Not applicable
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 -	NA as no development of new planting.	Not applicable
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 -	NA as no development of new planting.	Not applicable
Criterion 4.7.4: Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish	NA as no development of new planting.	Not applicable

Criterion / Indicator		Assessment Findings	Compliance
	the long-term suitability of the land for oil palm cultivation. - Major compliance -		
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 -	NA as no development of new planting.	Not applicable
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	NA as no development of new planting.	Not applicable
4.7.5.2	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 -	NA as no development of new planting.	Not applicable
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	NA as no development of new planting.	Not applicable
Criterion 4.7.6: Customary land			
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their	NA as no development of new planting.	Not applicable

Criterion / Indicator		Assessment Findings	Compliance
	views through their own representative institutions. - Major compliance -		
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	NA as no development of new planting.	Not applicable
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. - Major compliance -	NA as no development of new planting.	Not applicable
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. - Major compliance -	NA as no development of new planting.	Not applicable
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	NA as no development of new planting.	Not applicable
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	NA as no development of new planting.	Not applicable
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available.	NA as no development of new planting.	Not applicable

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	NA as no development of new planting.	Not applicable

Appendix B: List of Stakeholders Contacted

<p>Government Officer: Nil</p>	<p>Community/neighbouring village: Kg. Hutan Terabak Smallholders</p>
<p>Suppliers/Contractors/Vendors: Contractors and Sub-contractors</p>	<p>Worker’s Representative/Gender Committee: NUPW Representatives Female Workers’ Representative</p>

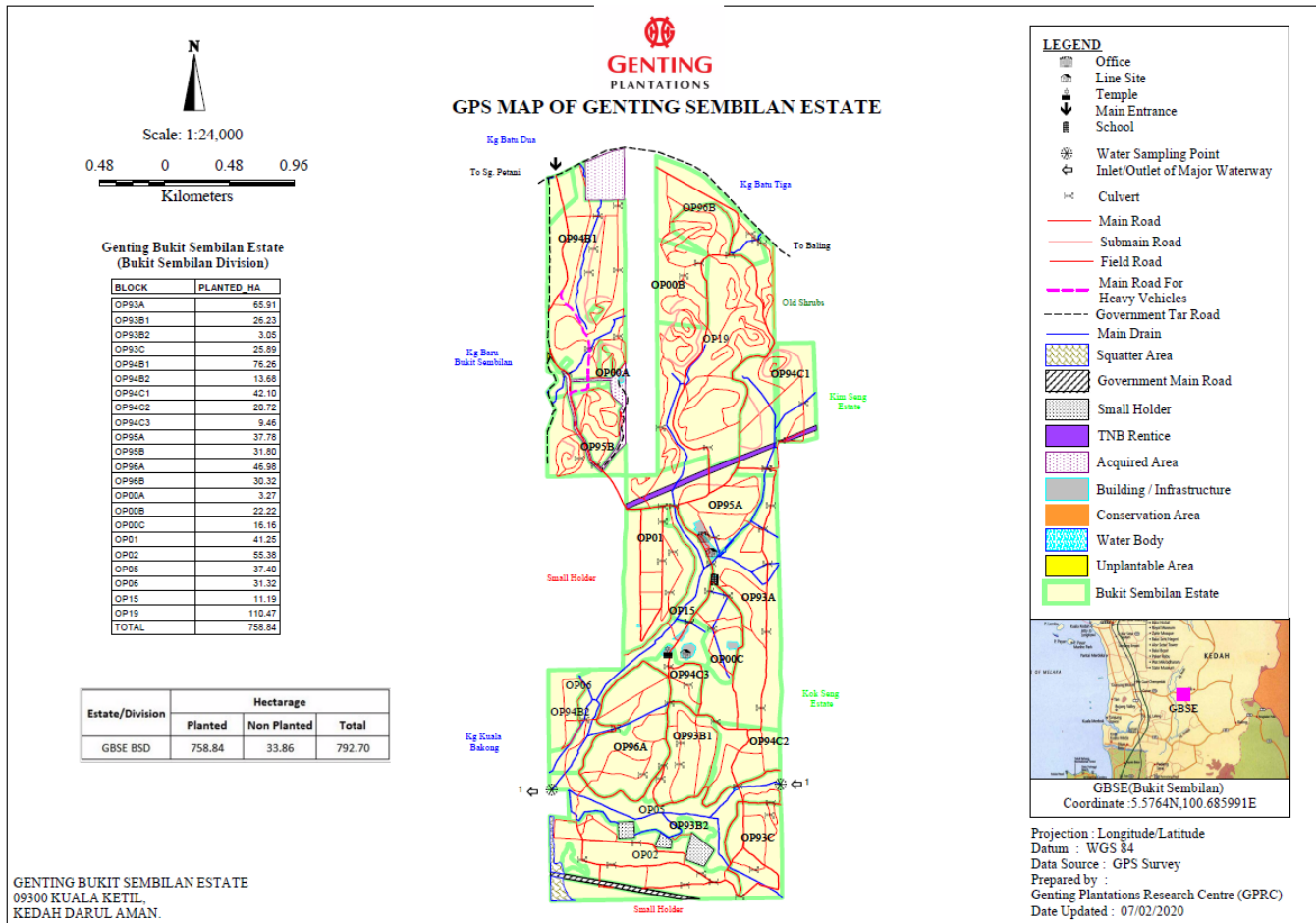
Appendix C: Smallholder Member Details

Not applicable.

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

Appendix D: Location and Field Map

Genting Bukit Sembilan Estate



Appendix E: List of Abbreviations

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