

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

### **FGV HOLDINGS BERHAD**

Client Company Address: Client Company (HQ) Address: Wisma FGV, Level 20 West, Jalan Raja Laut 50350 Kuala Lumpur, Malaysia

Certification Unit: Kulai Palm Oil Mill and Supply Base (FGVASSB Bukit Besar/Taib Andak Estate)

Date Final Report: 13/4/2022

Report prepared by: Muhammad Fadzli Masran (Lead Auditor)

Report Number: 3293244

#### **Assessment Conducted by:**

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



TAB	LE of C	CONTENTS	Page No
	Secti	on 1: Executive Summary	3
	1.1	Organizational Information and Contact Person	3
	1.2	Certification Information	3
	1.3	Location of Certification Unit	4
	1.4	Certified Area	4
	1.5	Plantings & Cycle	4
	1.6	Certified Tonnage of FFB	4
	1.7	Uncertified Tonnage of FFB	4
	1.8	Certified Tonnage	5
	1.9	Actual Sold Volume (CPO)	5
	1.10	Actual Sold Volume (PK)	5
	Secti	on 2: Assessment Process	6
		2.1 BSI Assessment Team	7
		2.2 Accompanying Persons	8
		2.3 Assessment Plan	8
	Secti	on 3: Assessment Findings	11
		3.1 Details of audit results	11
		3.2 Details of Nonconformities and Opportunity for improvement	
		3.3 Status of Nonconformities Previously Identified and OFI	
		3.4 Summary of the Nonconformities and Status	
		3.5 Issues Raised by Stakeholders	
		on 4: Assessment Conclusion and Recommendation	
		endix A: Summary of the findings by Principles and Criteria	
	Appe	endix B: List of Stakeholders Contacted	116
		endix C: Smallholder Member Details	
	Appe	endix D: Location and Field Map	118
	Appe	endix E: List of Abbreviations	120



### **Section 1: Executive Summary**

1.1 Organizational Information and Contact Person						
Company Name	FGV Holdings Berhad					
Mill/Estate	MPOB License No.	MPOB License No. Expiry Date				
	FGVPISB Kulai Palm Oil Mill 500161004000 31/03/2022					
	FGVASSB Bukit Besar/Taib Andak Estate 502670102000 31/03/2022					
Address	FGV Holdings Berhad, Wisma FGV, Level 20 West, Jalan Raja Laut, 50350, Kuala Lumpur, Malaysia					
Certification Unit	Kulai Palm Oil Mill and Supply Base (F	GVASSB Buk	it Besar/Ta	ib Andak Estate)		
Contact Person Name	Ameer Izyanif bin Hamzah					
Website	www.fgvholdings.com E-mail ameer.h@fgvholdings.com					
Telephone	+603-27890497 Facsimile +603-27890440					

1.2 Certification	Information				
Certificate Number	Mill: MSPO 693238				
	Estate: MSPO 693239	9			
Issue Date	12/06/2019		Expiry date	11/06/2024	
Scope of Certification	Mill: Production of Su	ıstainable Palr	n Oil and Palm Oil	Products	
	Estate: Production of	Sustainable (	Oil Palm Fruits		
Standard	MSPO MS 2530-3:20 Smallholders	)13 – Genera	l Principles for Oi	l Palm Plantations	and Organized
	MSPO MS 2530-4:20:	13 – General I	Principles for Palm	Oil Mills	
Stage 1 Date		19-20/09/2018			
Stage 2 / Initial Asses	sment Visit Date (IAV)	14-15/01/2019			
Continuous Assessme	nt Visit Date (CAV) 1	06-07/11/2019			
Continuous Assessme	nt Visit Date (CAV) 2	24-25/11/2020			
Continuous Assessme	nt Visit Date (CAV) 3	11-12/10/2021			
Continuous Assessme	nt Visit Date (CAV) 4	-			
Other Certification	ns				
Certificate Number	Standard(	s)	Certifica	ate Issued by	Expiry Date
RSPO 693237	RSPO Principles & Sustainable Palm Oil Pri Malaysia National Interp	oduction: 201		Malaysia Sdn. Bhd.	18/02/2024



1.3 Location of Certification Unit						
Name of the Certification Unit	Site Address	GPS Reference of the site office				
(Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)		Latitude	Longitude			
FGVPISB Kulai Palm Oil Mill	Kilang Kelapa Sawit Kulai, Felda Taib Andak, 81000 Kulai, Johor, Malaysia	1° 44′ 21.00″ N	103° 38′ 50.00″ E			
FGVASSB Bukit Besar/Taib Andak Estate	Stesen Penyelidikan Bukit Besar, 81450 Kulai, Johor, Malaysia	1° 44′ 31.00″ N	103° 38′ 48.00″ E			

1.4 Certified Area								
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted			
FGVASSB Bukit Besar/ Taib Andak	52.60	0.00	3.31	55.91	94.08			
TOTAL	52.60	0.00	3.31	55.91				

1.5 Plantings & Cycle							
Estato	Age (Years)			Mahana			
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Mature	Immature
FGVASSB Bukit Besar/Taib Andak	0.00	52.60	0.00	0.00	0.00	52.60	0.00
Total (ha)	0.00	52.60	0.00	0.00	0.00	52.60	0.00

1.6 Certified Tonnage of FFB						
		Tonnage / year				
Estate	Estimated (Jun 2021 - May 2022)	Actual (Nov 2020 - Oct 2021)	Forecast (Jun 2021 - May 2022)			
FGVASSB Bukit Besar/ Taib Andak	1,350.00	1,434.41	1,450.00			
Total	1,350.00	1,434.41	1,450.00			

1.7 Uncertified Tonnage of FFB						
	Tonnage / year					
Estate	Estimated (Jun 2021 - May 2022)	Actual (Nov 2020 - Oct 2021)	Forecast (Jun 2021 - May 2022)			
Felda Taib Andak	N / A	37,787.09	N / A			



Felda Ulu Tebrau		18,225.17	
Felda Bukit Batu		16,556.85	
Felda Inas Utara		15,994.23	
FGV Inas Selatan		10,895.34	
Md Fadzir bin Mohd Lajim		1648.58	
Eng Huat		14,467.06	
Bingan Jaya Sdn Bhd		3970.58	
Din bin Mohamad		5976.28	
Total	N/A	125,521.18	N / A

1.8 Certified Tonnage						
	Estimated (Jun 2021 - May 2022)	Actual (Nov 2020 - Oct 2021)	Forecast (Jun 2021 - May 2022)			
Mill Capacity:	FFB	FFB	FFB			
30 MT/hr	1,350.00	1,434.41	1,450.00			
	CPO (OER: 20.00%)	CPO (OER: 20.20%)	CPO (OER: 20.90%)			
SCC Model:	270.00	289.69	303.05			
l lib	PK (KER: 5.93%)	PK (KER: 4.63%)	PK (KER: 5.70%)			
	80.00	66.36	82.65			

1.9 Actual Sold Volume (CPO)							
CDO (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total		
CPO (MT)	MSFO Certified	ISCC	RSPO	Conventional	iotai		
289.69	0.00	0.00	37.93	133.04	170.97		

1.10 Actual Sold Volume (PK)							
DV (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total		
PK (MT)	MSFO Certified	ISCC	RSPO	Conventional	iotai		
66.36	0.00	0.00	47.83	0.00	47.83		



### **Section 2: Assessment Process**

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 190 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

#### **Assessment Methodology, Programme, Site Visits**

This on-site assessment was conducted from 11 - 12/10/2021. The audit programme is included as Appendix 2.3. The approach to the audit was to treat the mill and estate as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

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

The estates or smallholders sample were determined based on formula  $S = r\sqrt{n}$  where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement.

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

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

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

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

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



The following table would be used to identify the locations to be audited each year in the 5 years 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)
FGVPISB Kulai Palm Oil Mill	√	√	√	√	√
FGVASSB Bukit Besar/Taib Andak Estate	√	√	√	√	√

Tentative Date of Next Visit: October 3, 2022 - April 7, 2022

**Total No. of Mandays: 6 mandays** 

### 2.1 BSI Assessment Team

Team Member Name	Role (Team Leader or Team member)	Qualifications (Short description of the team members)
Muhammad Fadzli Masran (MFM)	Team Leader	<b>Education:</b> He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia
		Work Experience:
		He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations.
		Training attended:
		He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018, endorsed RSPO Lead Auditor Course in July 2018, MSPO Lead Auditor Course in October 2018, endorsed RSPO Supply Chain Certification training course in January 2019, MSPO Supply Chain Certification System (SCCS) Auditor training Course (MPOCC Endorsed), CQI and IRCA Certified ISO 9001:2015 Lead Auditor Training Course in April 2019, HCV and GIS Training in November 2019 and SMETA Requirements Training in April 2021.
		Aspect covered in this audit:



	T	
		During this assessment, he assessed the policy and commitment, social requirements, contract agreement, human rights, workers' welfare, stakeholder consultation, legal requirements, land & legal issue
		Language proficiency:
		Fluent in Bahasa Malaysia and English.
Amir Bahari (AB)	Team Member	Education:
		Holds a in Bachelor Degree in Science (Hons) Chemistry from USM & Diploma in Palm Oil Milling Tech/Management from MPOB.
		Work Experience:
		He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment, he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry.
		Training attended:
		He successfully completed the ISO 14001 Lead Auditor Course and Endorsed RSPO P&C Lead Auditor Course. He also attended HCV Awareness for RSPO/MSPO auditors on December 2016 and RSPO HCV Audit Guidelines on April 2021.
		Aspect covered in this audit:
		During this assessment, he assessed the aspects of legal requirements, occupational health safety requirement, HIRARC, training, environment impact assessment, natural and biodiversity conservation, waste management, economic management plan, mill best practices, estate best practices and management plan.
		Language proficiency:
		Fluent in Bahasa Malaysia and English.

### 2.2 Accompanying Persons

No.	Name	Role
	Not Applicable	

#### 2.3 Assessment Plan

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

Date	Time	Subjects	MFM	AB
Sunday 07/11/2021	-	Audit Team Travelling	√	√
Thursday 11/11/2021	08.30 - 09.00	Opening Meeting:  • Opening Presentation by Audit team leader.	√	√



Date	Time	Subjects	MFM	AB
FGVPISB Kulai Palm Oil Mill	08.30 - 12.30	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.		√
	09.00 - 11.30	Stakeholder interviews		√
	12.30 - 13.30	Lunch	√	√
	13.30 - 16.30	Continue with document review (MSPO part 4) P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition P5: Environment, natural resources, biodiversity and ecosystem services P6: Best practices	√	<b>√</b>
	16.30 - 17.00	Interim Closing briefing	√	√
Friday 12/11/2021 FGVASSB Bukit Besar Estate	08.30 - 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√
	09.00 - 11.30	Stakeholder interviews	-	√
	12.30 - 14.00	Lunch and Jumaat Prayer	√	√



Date	Time	Subjects	MFM	АВ
	14.00 - 16.30	Continue with document review Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services P6: Best practices, P7: Development of New Planting (if any)	√	<
	16.30 - 17.00	Preparation of audit report	√	√
	17.00 - 17.30	Closing Meeting	√	√



### **Section 3: Assessment Findings**

#### 3.1 Details of audit results

This assessment has been assessed using the following MSPO normative requirements. The assessment details are provided in Appendix A.

- ☐ MSPO MS 2530-2:2013 General Principles for Independent Smallholders
- ☑ MSPO MS 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders
- ☑ MSPO MS 2530-4:2013 General Principles for Palm Oil Mills

### 3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During the assessment there were no (0) Major & one (1) Minor nonconformities and raised. The FGVPISB Kulai Palm Oil Mill and Supply Base Certification unit submitted Corrective Action Plans for the non-conformity. Corrective action plans with respect to the non-conformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment.

	Minor Nonconformities:						
Ref:	Area/Process: FGVPI	Area/Process: FGVPISB Kulai Palm Oil Mill			Clause: MSPO Part 4 4.4.5.4: Minor		
2129696-202111-N1	<b>Issue Date:</b> 12/11/20	Issue Date: 12/11/2021			Due Date: Next Assessment		
Requirements:	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.						
Statement of Nonconformity:	The contractor workers Act 1969 (Act 4)	SOCSO contri	bution were	not as per Employee	es' Social Security		
Objective Evidence:  Noted during document review, the SOCSO contrivers were not as per Employees' Social Security Act 196 as follows:							
	Name/ID no.	Month	Salary Rar	nge SOCSO contribution as per act	Actual SOCSO Contribution		
	Muhammad Raffizal Haqimi Mohd Rahmad 03011001XXXX	Sept 2021	1300 - 14	30.40	28.10		
	Latiff b. Nanang 62010301XXXX	Sept 2021	1800 – 19	900 41.60	28.10		
		May 2021	1700 - 18		37.10		
		Mar 2021	1300 - 14	30.40	25.90		
Corrections:	The salaries of contract workers who have been in excess of salary deductions for SOCSO have been paid by the contractor.						



Root cause analysis:	The contractor did not refer to the "SOCSO CONTRIBUTION TABLE" for making the payment to the contractor workers.	
Corrective Actions:	<ol> <li>The SOCSO contribution table given to the contractor for further action</li> <li>The factory will ask the contractor to provide the previous month's salary statement of the contract employee each month before the latest monthly payment is made to the contractor to check on the SOCSO contribution.</li> </ol>	
Assessment Conclusion:	sment Conclusion: The effectiveness of the implementation will be verified during next assessment.	

Opportunity For Improvement			
Ref: Not Applicable	Area/Process:	Clause:	
Objective Evidence:	Not Applicable		

Noteworthy Positive Comments				
Good commitment from the management				
2.	Positive feedbacks from the stakeholders			

### 3.3 Status of Nonconformities Previously Identified and OFI

	Major/Minor Nonconformities:				
Ref: Not Applicable	Area/Process:	Clause:			
	Issue Date:	Due Date:			
Requirements:	NA				
Statement of Nonconformity:	NA				
Objective Evidence:	NA				
Corrections:	NA				
Root cause analysis:	NA				
Corrective Actions:	NA				
Assessment Conclusion:	NA				
Verification Statement	NA				

### 3.4 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1729409-201901-M1	Major	15/01/2019	Closed on 13/02/2019
1729409-201901-M2	Major	15/01/2019	Closed on 13/02/2019
1847407-201906-M1	Major	07/11/2019	Closed on 13/01/2020



1847407-201906-M2	Major	07/11/2019	Closed on 13/01/2020
1847407-201906-M3	Major	07/11/2019	Closed on 13/01/2020
1847407-201906-M4	Major	07/11/2019	Closed on 13/01/2020
1847407-201906-M5	Major	07/11/2019	Closed on 13/01/2020
1847407-201906-M6	Major	07/11/2019	Closed on 13/01/2020
1847407-201906-N1	Minor	07/11/2019	Closed on 25/11/2020
2129696-202111-N1	Minor	12/11/2021	Open

### 3.5 Issues Raised by Stakeholders

IS#	Description
1	Issues:  Female Worker – She informed that the management treated the female workers equally with male workers. No discrimination occurred. The female workers were given opportunity on promotion of work based on work performance and capability. They also informed that no case of sexual harassment and domestic violence reported. She as a new mother was consulted on her needs and all the needs were provided accordingly.
	Management Responses: Noted on the positive comment.
	Audit Team Findings:  Reviewed the payslips, employment contracts and records of meeting minutes of Gender Committee confirmed that no discrimination and sexual harassment reported.
2	<b>Issues:</b> Contractors – They informed that they have signed contract agreement with the FGV prior to provide services. The terms and conditions have clearly stated in the agreement included the payment term. The payment was made promptly. They also have been briefed on the SCOC where no child labour shall be employed.
	Management Responses: Noted on the positive comment.
	Audit Team Findings: Reviewed the agreements and payment records found no lapse on the payment terms.
3	<b>Issues:</b> Workers – The workers comprised of local and foreign workers. They informed that the management treated everyone equally without discrimination. Their wages are paid accordance to Employment Act 1955 and Minimum Wage Order 2020. They have the rights to join any association. For foreign workers, they are keeping their passport at the safety box inside their house with the key hold by them. They have freedom to access to the passport.
	Management Responses:  Noted on the positive comment.
	Audit Team Findings:



Reviewed the payslips for all sampled workers found all the workers were paid as per the legal requirements.

#### 4 Issues:

Smallholder – He informed that he has been briefed on the pricing mechanism for selling FFB to the mill. Payment was made on weekly basis and no delay of payment. He is aware on the complaint procedure.

#### **Management Responses:**

Noted on the positive comment.

### **Audit Team Findings:**

Verified payment records found that no lapse on the payment.

#### 5 Issues:

School Teachers – They informed that there was no child labour employed by FGV as the students were attended school as per school terms. They understand the complaint procedure and so far, there is no complaint reported. No negative impact sighted for the activities carried out by the mill and estate.

#### **Management Responses:**

Noted on the positive comment.

#### **Audit Team Findings:**

Reviewed complaint records found no issue reported by the schoolteachers.

#### 6 Issues:

Manager, Felda Taib Andak (Settlers) – He informed that they have meeting with the mill management to discuss on the FFB matters. He is aware of the complaint procedure and informed that there is no any complaint received from settlers during the time of audit. No land dispute reported by settlers as well. Payment of the FFB sold was made on monthly basis.

#### **Management Responses:**

Noted on the positive comment.

#### **Audit Team Findings:**

Reviewed payment records found that payment was made promptly.

#### 7 Issues:

Workers' Representative (Mill) – They informed that they were elected by the workers through election. They have meeting with the management to discuss any issues related to workers. All the issues reported were taken action by the management and resolved accordingly. No pending complaint during the time of audit. The wages were paid accordance to Minimum Wage Order 2020 and overtime was paid as per Employment Act 1955 and Collective Agreement.

#### **Management Responses:**

Noted on the positive comment.

### **Audit Team Findings:**

Reviewed meeting minutes and payslips found no issue.



### **Section 4: Assessment Conclusion and Recommendation**

### **Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings**

Based on the findings during the assessment FGVPISB Kulai Palm Oil Mill and Supply Base Certification Unit complies with the MS 2530-3:2013 or MS 2530-4:2013. It is recommended that the certification of FGVPISB Kulai Palm Oil Mill and Supply Base Certification Unit is approved and/or continued.

Acknowledgement of Assessment Findings	Report Prepared by
Name:	Name:
NOROLSAIFUL HAZRI BIN HAMID	Muhammad Fadzli b. Masran
Company name:	Company name:
FGV HOLDINGS BERHAD	BSI Services (M) Sdn. Bhd.
Title:	Title:
Sustainability Manager	Client Manager
Signature:	Signature:
he hand	3
<b>Date:</b> 02 MAR. 2022	<b>Date:</b> 21/02/2022



### **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

Criterio	on / Indicator	Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterio	n 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 -	FGV has established Group Sustainability Policy. Refer policy no. FGV/SED/POL/001, revision 4 dated 17/11/2020 approved by the Board of Directors.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement.  - Major compliance -	In the Group Sustainability Policy stated that FGV will continuously improve the quality of their products and services by adopting the best possible approach to enhance productivity and profitability by optimizing resource and operational efficiencies, while eliminating or minimizing negative impact on people and environment by:  1. Promoting economic growth  2. Respecting human rights  3. Protecting the environment	Complied
Criterio	n 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 -	The Sustainability, Compliance and Certification Department has established annual internal audit plan for all the mills and estates.  Latest internal audit through online platform was conducted on 16 – 19/08/2021 by Internal Auditor from SCCD. During the internal audit, 6 NCR were issued by the auditor.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.  - Major compliance -	FGV has established Standard Operating Procedure for Internal Audit. Refer document no. FGV/GSD-SCCD/SOP/04 dated 03/09/2020.  Latest internal audit was conducted through online platform on 16 – 19/08/2021 by Internal Auditor from SCCD. During the internal audit, 6 NCR were issued by the auditor. The audit report was documented in "Checklist Integrasi Audit Dalaman Persijilan Kelestarian 2021".	Complied
4.1.2.3	Report shall be made available to the management for their review.  - Major compliance -	The internal audit report was documented and made available for management review. As evidence, all findings from internal audit was responded by estate management within the timeframe stipulated in the Audit Procedure.	Complied
Criterio	n 4.1.3 – Management Review		
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.  - Major compliance -	The estate conducted management review meetings on annually basis. In the meetings discuss on audit results, production, environmental, social, management review, safety and health, training and housing. Reviewed the minutes meeting dated 04/12/2020.	Complied
Criterio	n 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 -	The estate has established an improvement plan 2021 mainly on environmental and social issues with details as follows. The estate documented the program as follows;  Concerns Details  Environmental Recycling Campaign to foster the spirit of harmony between the staffs / local residents.	Complied
		2 Environmental Planting of beneficial plants to reduce reliance on chemicals to curb P & D Issues I.e bagworms	

…making excellence a habit.™



Criterion / Indicator		Assessment Findings		Compliance	
		3	Environmental	Proper management of empty chemical containers to ensure no chemical pollution at land and water (river).	
		4	Environmental	Effective use of papers to reduce usage of papers and avoid open burning.	
		5	Safety	Memastikan kemalangan sifar di dalam ladang tahun 2021	
		6	Social	Maulidul Rasul Celebration	
		7	Social	Yasin Reading Ceremony to instil spiritual values among the community.	
		8	Social	Raya Celebration Annually	
		9	Social	Employees birthday celebration	
	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 -			new technology or work method being made in the of the estate. The existing practice being continued.	Complied
t	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 -	were wee deve of in	e briefed of any kly briefings. T elopment during nformation by tl	upon confirmation of any new projects. Employees new development in basic understanding during the he management team will be informed of such the monthly management meetings. Dissemination he RC office and SCCD are transacted during the neetings and emails.	Complied
	- Major compliance - ple 2: Transparency	of i	nformation by tl	he RC office and SCCD are transacted during the	



Criterio	on / Indicator	Assessment Findings	Compliance
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 -	FGV has established Standard Operating Procedure and documented in "Komunikasi, Penglibatan dan Rundingan". Refer document no. FGV/ML-1A/L2-Pr12, issue 0 dated on 01/06/2016.  Request for information and response is handle based on procedure. The procedure covering the internal and external parties. As per clause 6.2.3 "Jangka masa Untuk Komunikasi Luar" (Timeline to Response) were divided into two: -  1. Within 2 weeks from date received information which require response.  2. Within 1 week from completion of investigation.  Sighted at estate notice board the Standard Operating Procedure is displayed in Bahasa Malaysia.	Complied
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 -	Standard Operating Procedure and documented in "Komunikasi, Penglibatan dan Rundingan". Refer document no. FGV/ML-1A/L2-Pr12, issue 0 dated on 01/06/2016 under section 7.0 "Rekod Terlibat", publicly available document as follows:  Land Title  Safety and Health Plan  Environment and Social Management Plan.  HCV report.  Pollution Prevention Plan  Record of complaint and grievances.  Continuous Improvement Plan.  Human Rights Policy.  List of stakeholders	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		<ul> <li>Communication procedure</li> <li>OSH Minute Meetings</li> <li>Monthly Management Minutes Meeting</li> <li>Internal Memo and Circulars</li> <li>The estate has issued a memo to all the stakeholders on the publicly available document in the estate. Refer memo no (01) MEMO-RSPO/MSPO 2021 dated 05/01/2021.</li> </ul>	
Criterio	n 4.2.2 – Transparent method of communication and consult	ation	
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders.  - Major compliance -	FGV has established Standard Operating Procedure and documented in "Komunikasi, Penglibatan dan Rundingan". Refer document no. FGV/ML-1A/L2-Pr12, issue 0 dated on 01/06/2016.  This is including request and consultation with internal and external parties. The procedure stated:  1. Internal communication  a. Management to employee:  - morning muster  - memo and surat pekeliling dalaman  - poster and notice board  - continues campaign  b. Employee to management  - suggestion box  - morning muster  - through employee representative  - site visit from manager	Complied

...making excellence a habit.™



Criterion / Indicator		Assessment Findings	Compliance
		External communication     policies being circulated with the stakeholders     report to the environmental department and DOSH	
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 -	The estate has appointed the Executive, FGVAS Bukit Besar as Social Officer as per appointment letter no. (1)LANTIKAN/RSPO/MSPO 2021 dated 04/01/2021 signed by the Estate Manager.	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 -	The estate has established list of stakeholders. The list was divided into neighboring, internal and external stakeholders.  As for Movement Control Order and National Recovery Plan in Malaysia restricted the meeting involving large no of person, the estate had made an initiative to provide information and have feedbacks from the stakeholders by meeting the stakeholders individually.  Among the information shared with the stakeholders as follows:  1. Memo on Publicly Available document in the office dated 05/01/2021. Refer memo no. (01)MEMO-RSPO/MSPO 2021  2. Memo on Prohibition on Open Burning and Fire Prevention Control Plan dated 05/01/2021. Refer memo no. (02)MEMO-RSPO/MSPO 2021  3. Memo on Publicly Available document in the office dated 05/01/2021. Refer memo no. (01)MEMO-RSPO/MSPO 2021  4. Memo on Methods of Channeling Complaints and Grievances dated 05/01/2021. Refer memo no. (01)MEMO-RSPO/MSPO 2021  Reviewed the acknowledgement of acceptance of the memo dated 11/10/2021.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
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 -	FGV has established Standard Operating Procedure for traceability and documented in Standard Operating Procedure for "Mengangkut BTS Ke Kilang". Refer document no. MLSL (ed.3) Sec. 4 (8.0) dated 01/09/2017.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system.  - Major compliance -	Various means were available on how to monitor the traceability where among others the updating of FFB delivery records, through month end account closing and internal audit. Based on the records of FFB delivery, it was found that the procedure of traceability was well implemented. Reviewed "Borang Penggreddan BTS di Ladang" dated 10/07/2021, 08/07/2021, 07/07/2021 and 06/07/2021.	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system.  - Minor compliance -	The estate has appointed the Field Supervisor as person responsible as per appointment letter no. (04) LANTIKAN-RSPO/MSPO 2021 dated 04/01/2021.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained.  - Major compliance -	The estate maintains the records for all FFB transported to the mill. Reviewed the FFB dispatch records no. 00952 dated 08/11/2021 and no. 00953 dated 09/11/2021.	Complied
4.3 Prin	ciple 3: Compliance to legal requirements		
Criterio	n 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 -	A mechanism to ensure compliance to legal and other requirement has been documented in Manual Lestari established from the Head Office level.  i. The Legal Department will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as	Complied

…making excellence a habit.™



Criterio	n / Indicator	Assessment Findings	Compliance
		monitoring the status of legal compliance.  ii. Thereafter the estates and mill where applicable will be notified via email on the changes/update of LORR for implementation.	
		Licenses/permit viewed as complied by the mill for the legislative requirement among others viewed were as follows.	
		Licence/permit   Validity Period     1 MPOB no 502670102000   31/3/2022     2 KPDNKK - Permit to store diesel   23/10/17-22/10/18     3 Jab Tenaga Kerja - Gaji   Effective 11/10/16     4 CHRA   Effective 03/12/19	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirement register.  - Major compliance -	The documented legal register with written information on legal requirements applicable to the estate operation is available. The record titled "Senarai Rujukan Akta Dan Berdaftar Perundangan" issued by the SCCD last dated 20/08/2021. Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills. The identified legal among others includes;  a) Pesticides Act 1974 and Regulations, b) Environmental Quality Act and Regulations 1974, c) Factories and Machinery Act and Regulations, 1967 d) Weights and Measures Regulations 1981 e) Electricity Regulations 1994 f) Immigration Act 1959 g) Occupational Safety and Health Act 1994 h) Employment Act 1955	Complied

…making excellence a habit.<sup>™</sup>



Criterion / Indicator		Assessment Findings	Compliance
		<ul> <li>i) Industrial Relations Act 1967</li> <li>j) Children and Young Persons (Employment) Act 1966</li> <li>k) MPOB Regulations (Licensing) 2005, EQ (Prescribed Premise) (Crude Palm Oil) Regulations 1977</li> <li>l) Industrial Code of Practice for Confined Space 2010.</li> <li>m) MPOB licensing Regulation 2005.</li> <li>n) Akta Polis 1967</li> <li>o) Akta Pencegahan Dan Pengawalan Penyakit Berjangkit 1988</li> <li>p) Akta Std Min Perumahan Dan Kemudahan Pekerja 2019 (Pindaan)</li> <li>q) Perintah Gaji Minima 2020.</li> </ul>	
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 -	The Legal Department will update changes and communicate to the mill and estates via email. Thereafter the operating units will view the relevancy and adopt into the compliance list. This is also assisted via the Region Office and through personnel from SCCD during the site visits and audits.	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 -	Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office. This correspondence was sighted via an email issued from Head Office for the operating units to update and comply where applicable. The PIC for the legal matters for the estate is En Mohd Firdaus Ibrahim a Supervisor. Letter dated 04/1/20201 issued by the Estate Manager was sighted and verified.	Complied



Criterio	on / Indicator	Assessment Findings	
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 -	FGV Agriculture Services Sdn. Bhd. did not acquire land from landowners. The land was leased to FELDA by the government. FELDA give the right to use the land to FGV Agriculture Services Sdn. Bhd.  There were no issues of land disputes. There was no evidence that the oil palm plantation activities are diminishing the land use rights of other users.	
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.  - Major compliance -	The mill land ownership for 55.91 ha as per agreement entitled "Kelulusan Cadangan Kadar Pajakan Tanah bagi Pembaharuan Pajakan FGV Agri Services (FGVASSB) keatas Tanah FELDA Seluas 6751.665 Hektar". Refer letter no. (45)1450/1/11 Pt. 2 dated 09/04/2021.	Complied
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.  - Major compliance -	FGV AS Bukit Besar/Taib Andak Estate boundary clearly demarcated with concrete pole fences as sighted at blok 4 and 5 adjacent with Gedung Makanan Negara.	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 -	FGV has established procedure to handle any land dispute and recorded in "Pengenalpastian dan penyelesaian pertikaian tanah". Refer document no. ML-1A/L1-Pr10 (0) dated 01/06/2016.  No land dispute was recoded for FGV AS Bukit Besar/Taib Andak.	Complied
Criterio	n 4.3.3 – Customary rights		
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.  - Major compliance -	The land is legally owned by FELDA and leased to FGV AS Sdn Bhd. The existing land is not encumbered by any customary land rights.	Not applicable

...making excellence a habit.™



Criterio	on / Indicator	Assessment Findings	Compliance
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available.  - Minor compliance -	The land is legally owned by FELDA and leased to FGV AS Sdn Bhd. The existing land is not encumbered by any customary land rights.	Not applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.  - Major compliance -	The land is legally owned by FELDA and leased to FGV AS Sdn Bhd. The existing land is not encumbered by any customary land rights.	Not applicable
4.4 Prin	ciple 4: Social responsibility, health, safety and emplo	yment condition	
Criterio	n 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 -	SIA was conducted by Plantation and Sustainability Department (PSD) as per "Laporan Penilaian Impak Sosial Ladang FASSB Bukit Besar". Refer document no. 1/2018 dated 07/08/2018	Complied
		The assessment has involved the participation of stakeholders such as internal workers, teacher, surrounding communities and contractor.	
		Social Impact Assessment Procedure, FGV/ML-1A/L2-Pr21 issue 1, Revision 2 dated March 2019 under 6.1.9.2 stated stakeholder consultation to be conducted once in 2 years. As for Movement Control Order and National Recovery Plan in Malaysia, the renewal of the Social Impact Assessment was postponed.	
		The negative impacts and positive impacts that raised during the assessment were incorporated into the management plan.	
		The estate has established Social Management plan base on the SIA conducted and feedbacks from the stakeholders. Reviewed the management plan dated 09/11/2021 and the implementation of the management plan as follows:	



Criterio	n / Indicator		Assessment Findings	Compliance
		1.	Late received of passport after permit renewal – the estate will follow up with the related department and immigration on the renewal process	
		2.	Application to take leave to go back to home countries – as Malaysia yet to open the country boarders for foreign workers, the leave is postponed. However, for those who want to go back for good, there is no restriction.	
Criterion	1 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 -	According a. b. c. d. e. f. FG 17 Pc 14 W rai	ocedures for Complaints and Grievances was documented in Menangani duan dan Rungutan. Refer document no. ML-1A/L2-Pr13 issue 0 dated ./06/2016. This procedure covers:  Problem with the management  Housing and Workers Housing Problem  Problem involving estate management  Complaint & grievance facilities  Complaint/grievance involving estate workers welfares  Freedom of speech in welfare meeting  Whas established Whistleblowing Policy. Refer document no. 6V/GGD/POL/001, rev. 8.0 approved by the Board of Directors on ./11/2020  Dicy of whistle-blower policy was established in the sustainability manual ./  A dated 1/8/06. The issues emphasized in the policy were  histleblowing e-form at www.fgvholdings.com if you wish to report or ise concerns related to abuse of power, fraud, bribery, sustainability sues and other misconducts.	Complied

...making excellence a habit.™



Criterio	on / Indicator	Assessment Findings	Compliance
		The policy will ensure identity will be protected. In additional the company has established a hotline number 1800-88-8717 and alert mail alert@fgvholdings.com.	
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 -	For grievances from external stakeholders, the estate has established form "Borang Aduan" to records all the grievances. The form was placed together with the grievances box outside the office. As to date, no grievances were received from external stakeholders.  For internal stakeholders, all grievances were recorded in complaints logbook. Reviewed the complaints/grievances made by the internal stakeholders were resolve on timely manners.	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 -	For grievances from external stakeholders, the estate has established form "Borang Aduan" to records all the grievances. The form was placed together with the grievances box outside the office.  For internal stakeholders, all grievances were recorded in complaints logbook.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.  - Minor compliance -	Interview with internal and external stakeholder during stakeholder consultation found that they were aware of the complaint procedure and were briefed by the management during stakeholder meeting.	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 -	The records of complaint for the past 24 months (since November 2019) were available in the complaint records book.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.3.1	Growers should contribute to local development in consultation with the local communities.  - Minor compliance -	The estate is committed and have contributed to local development. The contribution made to the internal and external stakeholders. As evidence, the estate has contributed Lunch Box to all workers from 09 - 15/07/2021 as per email from Human Resource Department for Enstek and South Zone dated 09/07/2021.	Complied
Criterio	n 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.	The Group Occupational Safety & Health Management Policy had been established and implemented as follows;	Complied
	- Major compliance -	'Pernyataan Polisi Kesihatan Dan Kesihatan Keselamatan signed by CEO dated 05/11/21".	
		Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors. The Policy is implemented among others through the OSH activities by the on-site Safety Health Officers and monitored by OSH/Plantations Sustainability Department from Head Office.	
4.4.4.2	<ul> <li>The occupational safety and health plan shall cover the following:</li> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risks of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: <ol> <li>all employees involved shall be adequately trained on safe working practices</li> <li>all precautions attached to products shall be properly observed and applied</li> </ol> </li> </ul>	<ul> <li>a. Briefings to employees are made through weekly briefing and ad-hoc basis through the field staff/Executives. Subjects among others include safety policies, fields operations, road safety, zero harm, and precautionary measures, dialogue. Content includes among others to prioritise safety, execute work safely, adhere all safety rules and regulations and to target zero accident. Apart from specific session, safety policy and targets were available on display board printed in both English &amp; Bahasa Malaysia.</li> <li>b. HIRARC for the estate are available and with latest review formalised on Sept 2018. All the main activities were covered. HIRARC for both</li> </ul>	Complied



Criterion / Indicator				Assessmen	t Find	ings		Compliance
d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as		the es		ere sighted havin	ig deta	ails as follow	s of common	
identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).		No 1	Office	Activity	No 5	Act Pruning & ha	ivity	
e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe		2	Pest &		6	Fertiliser app	olication	
handling and storage in accordance to Occupational Safety		3	Weedin Rat Bai	_	8	Palm Mound Waste mana		
Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.		All HIR	ARC wer	e verified and appı	roved a	ccordingly.		
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	C.		des and ed.	vides training to chemicals. The	follow	ring training	sessions were	
and collective agreements.	ļ		Date	Trainin		ect	Attendee	
g) The management shall conduct regular two-way			7/7/21	Weeding / sprayi			Entire	
communication with their employees where issues affecting			)9/7/21  5/2/21	Fertiliser applicat IPM management			Entire Entire	
their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept			13/2/21	Policies MSPO RS		efina	Entire	
and the concerns of the employees and any remedial actions			23/9/21	SW management		Sillig	Entire	
taken are recorded.		Details	of oth	ner training are	availa		(training and	
h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.				SH programs are a HQ level e.g. OS				
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.	d.	·		PE, training on MSI ovide PPE to the	•		apron. safety	
j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.	<b>u</b> .	helmet	s, safety	shoes relevant to visit workers were	the w	ork handled b	y the workers.	
- Major compliance –		_	s the fol					

…making excellence a habit.™



Criterion / Indicator		Assessment Findings	Compliance
		i. Mask / Nitrile gloves	
		ii. Dupont apron / Goggles	
		iii. Vest / Safety helmets	
	e.	The estate had established SOP for chemical handling and documented is available in the following document.	
		i. Manual Ladang Sawit Lestari	
		- Prosedure Kerja Selamat	
		ii. Manual Sustainability	
		- Prosedur Kerja Selamat	
		- Prosedur membancuh Racun di PREMIX	
		- Pengendalian Bahan Kimia	
		The document was sighted.	
	f.	The Estate Manager is appointed as the Chairman of the ESH committee via letter signed by the Head R & D Division 02/1/2021. The Manager subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the estate. All identified Executives were officially given a letter for such an appointment.	
	g.	The estate management conducts regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held by the estate are recorded below.	
		Estate 4th 3rd 2nd Ist	



Criterion / Indicator	Assessment Findings	Compliance
	Taib Andak  24/9/21  21/06/21  19/03/21  31/12/20  The minutes of meeting randomly were sighted and verified. Workers during the meeting participated in the discussion mainly on housing and safety. All units adopted the agenda as released SCCD. This agenda list was sighted and adequate to discuss salient issues relating safety, environmental and health. The agenda as discussed during the meeting among others includes the following;  i. Lapuran Pemakaian PPE  ii. Lapuran Pemakaian PPE  iii. Lapuran Pematuhan Wordang-Undang  v. Lapuran Remalangan Region  vi. Lapuran Pemeriksaan Tempat Kerja  vii. Lapuran Kesihatan & Kawasan Perumahan  viii. Lapuran Bahan Buangan Terjadual/Isu Alam Sekitar	
	<ul> <li>h. The aaccident and emergency procedures are available. There was formation of ERP Team &amp; ERP for all the identified incidences. The organisation chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. ERT are initiated for fire &amp; flood, chemical spillage. Procedures guidelines were produced by SCCD and amended to tailor to the situation differences in the estate. ERP currently only confined to fire situation.</li> <li>i. The estate trained their nominated employees for First Aid mainly for those involved in the field operations. A First Aid Kit equipped with</li> </ul>	

...making excellence a habit.™



Criterio	on / Indicator		Assessment Findings	Compliance
		j.	approved 16 items is available and replenished on a weekly basis. Distribution of the 1st Aid Kit for the estate are made at the following places/personnel;  Office / AP Post / Chemical Store / Fertiliser Store / Workshop / Field staff / Mandores. The boxes kept by the mandore were sighted during the field visit. Regular briefing to the 1st Aid Kit holders on the management of the content and usage.  Records of all accidents are kept in the estate for a min of 10 years. Accident incidences if any are reviewed during safety meetings. DOSH submission JKKKP 8 was complied under the legislative requirement. The estate recorded zero accident in 2020 and 2021 till Oct 21 closing  Cases LTI Non LTI JKKP 8 submission  0 0 0 08/1/2021	
Criterio	n 4.4.5: Employment conditions			
4.4.5.1	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.  - Major compliance -	of Of Ur co ric De ric	GV has established Group Sustainability Policy. Refer policy no. GV/SED/POL/001, revision 4 dated 17/11/2020 approved by the Board f Directors.  Index section 5.2 Respecting Human Rights stated the company ommitment to respect human rights by upholding international human ghts principles and standards as encapsulated in the Universal eclaration of Human Rights (UDHR), and other applicable internal human ghts treaties, subject to the laws and regulations of the countries and thich territories of FGV Group operates.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		The policy was communicated to the employee through morning briefing, training and displayed at designated places in the estate. Reviewed the Group Sustainability Policy briefing dated $11 - 12/08/2021$ .	
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.  - Major compliance -	As stated in the Group Sustainability Policy. Refer policy no. FGV/SED/POL/001, revision 4 dated 17/11/2020 under section 5.2.1 Equality and Non-Discrimination.  The section stated that no person shall be subjected to any discrimination in employment including hiring, compensation, advancement, training, disciplinary action, termination or retirement on the basis of gender, race, religion, age, disability, sexual orientation, gender identity, nationality, political opinion, social group, ethnic origin, reproductive rights or other forms of discrimination.	Complied
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.  - Major compliance -	As stated in the Employment contract issued to the workers under section 5. Salaries and wages. Reviewed the pay slips for the month of February, May and September 2021. for employee with ID no. as follows:  1. PB001919009 2. PB001919014 3. PB001919010 The salary payment was found accordance with the Employment Contract and Minimum Wage Order 2020.	Complied
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.	There is only one contractor (Ahmad Bin Hashim) hired by the estate to transport FFB to the mill. The job is done through assistance from his son. Pay slip is not necessary as the business is run on family basis.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	- Minor compliance -		
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.  - Major compliance -	All the recruited workers will be registered in the Human Resource Management System (OPMS) where personal details such as name, nationality, date of employed, job description, wage rate, date of birth, gender and entitlement of public holiday was stated in the biodata form.	Complied
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 contract is available for each and every employee indicated in the employment records.  - Major compliance -	The estate has issued an employment contracts to the workers. The workers are required to read, understand and signed the agreement prior working. The contract contains clauses such as:  1. Agreement period 2. Probation period 3. Working days/hours 4. Jobs description 5. Salaries and wages 6. Housing facilities and accommodation 7. Transportation 8. Medical checkup and medical benefits 9. Accommodation, Personal Protection Equipment and working tools 10. Payment for recruitment and passport and permit renewal 11. Insurance 12. Employee deaths 13. Rest day, annual leaves, public holidays, leaves for going back to home countries, sick leaves 14. Disciplinary and attitude	Complied

...making excellence a habit.™



Criterion / Indicator		Assessment Findings	Compliance
		15. Termination of employment contract 16. Etc. The contracts were provided to the workers with their mother language. Reviewed the contracts for employee with i.d no. as follows:  1. PB001919009 signed on 16/03/2020 2. PB001919014 signed on 16/03/2020 3. PB001919012 signed on 16/03/2020 4. PB001919010 signed on 16/03/2020 The workers were provided with a copy of the contract. Reviewed the acknowledgement of receiving and understanding of the contract dated	
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 -	16/03/2020.  The working hours are recorded using Pocket Check - roll system. The pocket check -roll will be verified by supervisor daily.	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 -	Normal working hours is 8 hours/day. Total monthly working hours is 208 hours. Verified the pays lips, the payment and calculation of overtime well distributed.	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 -	Salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker. Workers interviewed confirmed that they are being paid more than the stipulated minimum wage and that they understand all the deductions being made.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
		Reviewed the pay slips for the month of February, May and September 2021. for employee with i.d no. as follows:	
		1. PB001919009	
		2. PB001919014	
		3. PB001919012	
		4. PB001919010	
		The salary payment was found accordance with the Employment Contract and Minimum Wage Order 2020.	
4.4.5.10	to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.	All local workers, staffs and executives, all of them are covered under EPF & SOCSO as required by the Malaysian Laws and Regulations.  The company is also providing free transportation to send the workers to town for daily goods purchased once a month. Other than that, subsidy	Complied
	- Minor compliance -	of water RM 4 and electricity RM 6 was provided.	
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 compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.	Housing is provided to workers with basic amenities. Water and electricity are supplied by public domain. There are complete facilities such surau, bathroom and kitchen. Other than that, subsidy of water RM 4 and electricity RM 6 was provided.	Complied
	- Major compliance -		
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.	As stated in the Group Sustainability Policy. Refer policy no. FGV/SED/POL/001, revision 4 dated 17/11/2020 under section 5.2.5 Preventing Harassment and abuse.	Complied
	- Major compliance -	In the policy stated the FGV group shall not tolerate any form of harassment and abuse including physical, sexual, physiological or verbal. Everyone shall be treated with respect and dignity.	



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.  - Major compliance -	As stated in the Group Sustainability Policy. Refer policy no. FGV/SED/POL/001, revision 4 dated 17/11/2020 under section 5.2.2.9 stated that FGV Group recognizes and respects employees' rights to freedom of association and collective bargaining.  Reviewed the latest agreement between FGV Palm Industries Sdn. Bhd. and "Kesatuan Pekerja – Pekerja and FGV Palm Industries Sdn. Bhd. (Semenanjung) no. 031/2020 dated 31/01/2020.	Complied
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.  - Major compliance -	As stated in the Group Sustainability Policy. Refer policy no. FGV/SED/POL/001, revision 4 dated 17/11/2020 under section 5.2.2.4. The policy stated while FGV is committed to employ only person with the age of 18 and above, FGV recognizes that Malaysian laws allow for young person to be engage in certain forms of employment.	Complied
Criterior	1 4.4.6: Training and competency		
4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.  - Major compliance -	Taib Andak Estate held the following training sessions.  Date Training Subject Attendee  1 18/10/21 First Aid Box / Fire extinguishers Entire  2 13/7/21 MSPO/RSPO working at height Entire  3 18/5/21 PPE adherence and management Entire  4 13/9/21 Harvesting safety SOP Entire  5 17/7/21 Weeding / spraying Entire  6 09/7/21 Fertiliser application Entire	Complied



Criterio	on / Indicator		Compliance					
			12/10/21 15/2/21 15/2/21 13/9/21 17/6/21 17/6/21 29/7/21 21/6/21 07/9/21 23/9/21 16/6/21 05/5/21	IPM managem Policies MSPO FFB grading Open burning Harvesting SO Policies briefin Induction Prog SW manageme HCV/RTE brief Workers trans	efing ent RSPO briefin  P g g gram Refreshent ing portation e and manage	ner FW	Entire	
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.  - Major compliance -	The esta desc	training need blished. The criptions, seed subjects amount of the criptions of the criptions, seed subjects amount of the criptions, seed subjects amount of the criptions of the cription of	· driving	aining need	s include cate	egories of job	Complied



Criterio	on / Indicator	Assessm	Compliance		
		9 Scheduled waste /ERP Schedule is subject to changes by	the management.	/	
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 -	Training details are planned and s in compliance and detailed in 4.4. on annual basis. In addition, it is s year should need arises.	gram are made	Complied	
4.5 Prin	ciple 5: Environment, natural resources, biodiversity	and ecosystem services			
Criterio	n 4.5.1: Environmental Management Plan				
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.  - Major compliance -	There is a Group Policy titled "Pern Berhad" dated 05/11/2021 signed environmental protection. Therei commitment towards;	by the Group CEO main	nly in relation to	Complied
		i. to protecting the environmen sustainable development.	t and conserving biod	iversity through	
		ii. Abide by all legislative require	ment		
		iii. Manages environmental risk a minimise risk and pollution to		ole resources to	
		iv. Continuing and improving effic	ng environment.		
		From field visits and interviews will being practiced in the estate.	th the workers there is r	no open burning	



Criterio	on / Indicator			Compliance				
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 -	dod In to; i. ii. iv.	the comprehension Plan to avoid not Reduction dispresponsibilities Plan to reduce Development a	y 2017 and ve report, egative imposal of value. pollution and implement	d revised the stud npact and waste to and releated	d annudy of a d to praking ase of ase.	the estate operations are ally latest being on 03/8/21. Aspect and impact are aimed comote positive impacts. Into consideration of social GHG activities/operations among	Complied
			Ac	Activities			Activities	
		1 Poisoning of VOPs/ woodies		9	Grass slashing			
		2	7 3			10	Fertiliser application	
		]	Management containers	of	empty	/ 11	Grading of FFB	
		2	Rat baiting			12	Vehicle maintenance	
			Triple rinsing			13	Chemical storage	
		6	5 Drainage const	truction		14	P & D census	
		7	7 Rat Baiting			15	Boundary maintenance	
		8	Road maintena	ance		16	Landfill management	
		Ма	nagement Plan &	impact on is listed below:				
			Impact	Sour	ce		Action Plan	
1		1	Soil pollution	-				



Criterio	n / Indicator				Assessmen	t Findings	Compliance
		2	Water pollution	l	Empty chemical containers	Recycle used containers into a safe use. Disposed to a registered LSH Recycler Enterprise.	
					llowing efforts we ne environment.	ere initiated by the management to	
		1	Reduce of	Issue duce chemical spillage		Initiative Implement mixing at designated area (store area)	
		2 Smoke emission from vehicles				Implement PMV	
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.  - Major compliance -	The det pla wit	Complied				
			Jadual			Details	
		1		Rumu KETAF		mpak Negatif Alam Sekitar Paling	
		2 4.2 Pelan Pengurusan (Mana Impak Alam Sekitar Dari				agement Plan) Bagi Mengurangkan i Aktiviti Ladang	
		3		Alam	Tindakan (Action Sekitar Dari A maran (Impak Po		
			the above nually.				



Criterio	on / Indicator	Assessment Findings	Compliance
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan.  - Minor compliance -	The program to promote the positive impacts is illustrated in 4.5.1.2 and 4.5.1.3 above.	Complied
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 -	A training program is available in the Training Program updated on a yearly basis or revised as per the management requirement. Included in this programme are subjects related to environment e.g. environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training. Other training organised in relation to environmental issues and activities among other as listed below;            No         Subject         No         Subject           1         Chemicals handling         4         HCV / RTE           2         Scheduled waste         5         Soil pollution           3         Buffer zone protection         6         Water pollution	Complied
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.  - Major compliance -	Subjects concerning environmental are also included and discussed in the ESH committee meeting. The dates of meeting held by the estate are recorded below.  Estate 4th 3rd 2nd 1st Taib Andak 24/9/21 21/06/21 19/03/21 31/12/20  Sighted minutes of meeting available in the ESH meetings. Agenda in relation to environmental among others include;  i. Lapuran Pematuhan Undang-Undang ii. Lapuran Kesihatan & Kawasan Perumahan iii. Lapuran Bahan Buangan Terjadual/Isu Alam Sekitar	Complied



Criterio	on / Indicator		Assessm	ent Findings		Compliance				
		Performance M	In addition, the management organised EPMC Environmental Performance Monitoring Committee) twice yearly. Issues were related to the environmental performance of all units within the Region.							
Criterio	n 4.5.2: Efficiency of energy use and use of renewable energy	JY								
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.	renewable sou monitored to of for comparison using diesel/mi	Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented in the estate. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Monitoring is made using diesel/mt FFB, commentary on variance on irregularities variances.							
	·	Month 21	Diesel/ L	FFB mt	Diesel /FFB					
	- Major compliance -	Jan	0	73.34	0.00					
		Feb	176.52	70.58	2.50					
		Mac	0	115.88 135.48	0					
		April May	0	158.32	0					
		June	80.00	130.47	0.61					
		July	54.44	131.50	0.41					
		Aug	54.44	174.41	0.31					
		Sept	0.00	137.39	0.00					
		Oct	51.18	99.13	0.52					
		Nov	0	0.00	0.00					
		Dec	0	0.00	0.00					
		Month 20	Diesel/ L	FFB mt	Diesel /FFB					
		Jan	70.57	43.20	0.61					
		Feb	66.28	0	0					



Criterion / Indicator		Assessment Findings							
		Mac	67.22	0		0			
		April	80.60	0		0			
		May	89.12	0		0			
		June	105.02	24.3	2	0.23			
		July	114.48	0		0			
		Aug	115.12	0		0			
		Sept	105.77	0		0			
		Oct	99.13	161.6	58	1.63			
		Nov	100.90	45.3	9	0.45			
		Dec	81.56	0		0			
	No 1	Target Backhoe tractor/ Machines		fossil fuel ensumption	engine is turn off during				
			from composite vehicles and mobile equipm	fuel using nent	which c	ord vehicle activity consume fuel			
	2	Van / Supervisory vehicle	from composite vehicles and mobile equipm	onsumption any-owned fuel using nent	in ord waste consum To tu	ırn off vehicle during idle time.			
	3	Electrical supply	To reduce regen-sets fo supply	eliance on r power	Utilizati sources				

...making excellence a habit.™ Page 45 of 120



Criterio	on / Indicator			Assessment Findings	Compliance
		a) b) c)	formance va Infrastructu Community No. of vehic Weather int		
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 -	bu	e estate ma dget. Mainly lection and t	Complied	
4.5.2.3	The use of renewable energy should be applied where possible.  - Minor compliance -	tec	ere was no op hnology. Ma d shell are us wer generation	Complied	
Criterio	n 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 -	of to cor	V Kulai Mill a pollution. Th mitigate and mmon signifi erations amo Receptor Air	Complied	
			Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic	



Criterio	on / Indicator				Assessment Findings	Compliance
		2	Water Land	Cleanir cyclone boiler Schedu	ses (ETP, EFB dumping)- GHG ng water/run-off/process station waters (hydro- e /sterilizer condensate/clarification waste) & quenching water and blow down uled waste, domestic waste and ial/process waste.	
		The			om the mill/estates operations as shown below:	
		1	Type of Scheduled	waste	Details  Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	
		3	Domestic Industrial		rubbish from the mill/estate complex and employees' quarters  Fiber, palm kernel shell, boiler ash, scrap iron	
		The	, <b>J</b> -	entified	Sewage from housing/office complex from the mill/estate's activities:	
		1 2 3	Type of Black smol Odor & ga Leakage lubricant	ке	Details Emission from Boilers/vehicles/engines Activities from the effluent treatment Storage & vehicle maintenance	
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	Tai har i.	Complied			



Criterion / Indicator			Asse	essme	nt Findings			Compliance
b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products  - Major compliance -	a) b)	- Prosedur - Prosedur - Prosedur - Pengenda - Vaste Mana SCCD and ve Interview with were trained the chemicals Among the including perwashed at wout in companion of the Inventory and proper mana Kualiti Alam SCUALITY ALE TAE TAE	Kerja Selama membancuh dian Bahan ka gement Plan rified by the ch staffs and and they has s should be identified w sticides con vashing statioliance with ad consignma gement and Sdn Bhd regions Date 18/6/20 29/7/21	Racun (imia  n 2021 Assista workers ad unde used an vastes tainers. on prior releva ent dor disposa istered  SW 10  peratin	has been est ints/Manager. i.e. storekeep rstood the haz id disposed in a include empty Empty pestion to disposal. I ant regulation cuments verified il. The schedule with DOE.	ers and che ards involved a safe mannor chemical cides conta Disposals work of scheduled for confided waste is a SW410	mical mixer ed and how her.  containers iners were ere carried led waste. irmation of disposed to  SW409  0.020  0.500	



Criterio	n / Indicator	Assessment Findings	Compliance
		The requirement is established and in compliance. The procedure documented under this subject under Perlupusan Sisa Domestik. Document dated 01/06/2016. The procedure has detailed the definition of solid waste. The types of solid wastes have been categorized as follows;  a) Sisa pepejal komersial / pembinaan b) Sisa pepejal isi rumah / perindustrian. c) Sisa pepejal keinstitusian d) Sisa pepejal import / awam.  In addition there are 'Pelan Pengurusan Domestik Dan Bahan Buangan Tahun 2021. In this plan activities as scheduled are monitored with the date/month recorded. This was sighted and verified. The site Block 5 has signboard displayed and properly demarcated. The area is sufficiently distant from habitation and water contamination. The site disposal area (landfill area) is shown and marked in the estate map.	
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 -	The procedures for handling used chemicals classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by SCCD and implemented in all estates and mills for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows;  i. Management of class 2 (and higher) chemical containers.  ii. Management of fertiliser bags  These documents were established on 01/6/2016 issued throughout the Group Estates and remain effective for practice in all operating units.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
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 -	This is available and detailed in document titled "KITAR SEMULA BEKAS RACUN PEROSAK' The objective of the guidelines is to; i. 'memelihara kesejahteraan alam sekitar ii. to comply with the GAP iii. avoid misuse of empty pesticide containers. The guidelines also reasoned out the need of triple rinsing and produced the quantity of remaining residue after the triple rinsing.  Pictorial guidelines on the methods of triple rinsing are also shown in the document. Under the operational control procedure established as given in 4.5.3.3 above the guideline and practice for handling empty pesticides are as follows; i. All class 2 and above containers are tripled rinsed and hole punctured at the bottom only if the waste generator is to dispose as non-scheduled waste. ii. Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process. These guidelines are based on Department of Agriculture ref 91/120/038/014 dated 7/11/2002.	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 -	Domestic waste for the estate was disposed as follows;  Estate Landfill site Remarks Bkt Besar Block 5 Collection 2/3 x week  The sites were sighted and verified. The area is sufficiently distant from habitation and water contamination. The site disposal area (landfill area) is shown and marked in the estate map.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
Criterio	n 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 -	The estate assessed their polluting activities incorporated in the Environmental Improvement Plan/Pollution Prevention Plan 2021. Details as provided in 4.5.1.3 and 4.5.1.4. Therein is given potential sources of pollutants, objective & targets and action to be taken.  Pollution Source 1 Air Vehicle & gen-sets 2 Water cleaning water & run-off 3 Land SW, domestic waste & industrial waste  The GHG final emissions summarised from the estate activities is shown as tCO2e/tFFB	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented.  - Major compliance -	The estate assessed their polluting activities and is tabulated under the environmental management program. Therein is given potential sources of pollutants, objective & targets and action to be taken. Sighted targeted area assessed among other as follows;    Sources/objective & target   Action steps     1   Management of HCV river reserve where applicable   Sprayers/manuring gang to avoid any chemical-related works at the area     2   To monitor waste management plan for its suitability   SW disposal monitoring. Delivery to SL Recycling Sdn Bhd     3   To improve employees awareness on pollution prevention at housing   Continuous reminders	Complied



Criterio	on / Indicator		Assessment Findings						Compliance	
			5 T id es	To r dentification evaluation	mise spillage al onto the gro eview a on & in	ound aspect mpact lentify	spill trays	s training an		
Criterio	n 4.5.5: Natural water resources									
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:	The rive	This document is available titled 'Pelan Pengurusan Air Tahun 2021. Therein among others is illustrated identification of water source e.g. river, mode of measurement, risk event & cause of risk event, preventive & corrective measures, and PIC (person in charge)							Complied
	<ul><li>a. Assessment of water usage and sources of supply.</li><li>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects</li></ul>	Ta	The management also records the rainfall data ( <i>Rekod Hujan Bulanan Tahun 2020</i> ) for better monitoring of the palm growth. Rainfall records for the estate in 2020 as follows;							
	<ul> <li>the estate's current activities.</li> <li>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> <li>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</li> </ul>	3	1	Month Jan Feb Mac April May June	mm 179.90 113.80 101.50 272.50 339.00 206.80	7 8 9 10 11 12	Month July Aug Sept Oct Nov Dec	mm 324.60 183.60 22900 73.80 264.90 212.60		



Criterion / Indicator		Assessment Findings	Compliance	
	<ul> <li>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</li> <li>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</li> <li>- Major compliance -</li> </ul>	There is no buffer zone within the estate area/land. The buffer zones on Group basis are established are as follows;  River width Buffer zone 1 > 40 meters 50 meters 4 5 - 10 meters 10 meters 2 20 - 40 meters 40 meters 5 < 5 meters 5 meters 3 10 - 20 meters 20 meters  There is no water stream flowing within the estate vicinity except for a small drainage at block 03/05 neighbouring to Gedung Makanan Negara managed by FELDA. The policy for the protection of watercourse is made known to all employees for an effective implementation when the need arises. The estate used water supply form SAJ hence does not require an internal water treatment for the domestic consumption.		
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.  - Minor compliance -	This is in compliance by the estate. This requirement is also audited internally by the SCCD personnel. During the field visit no construction of such was observed. This was further supported through facts obtained from interviews among the employees.	Complied	
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).  - Minor compliance -	During the site visit practices of water harvesting are noted mainly in the estates for washing and machine cleaning. Roadside pits where applicable are constructed at every 3 palm rows, to divert in event of water overflowing and also to benefit the nearest palm at the pit end to obtain additional moisture.	Complied	



Criterio	on / Indicator	Assessment Findings	Compliance
itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:  a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.		The last assessment was conducted with details as follows; "Laporan Penilaian Konservasi Tinggi (HCV) & Biodiversiti; Ladang Penyelidikan FASSB Taib Andak & FPISB Kilang Sawit Kulai, Felda Taib Andak". This report was updated and reviewed by En Amir Hamzah Dollah@Abdullah from the Due Diligence Unit, Plantations Sustainability Department dated 13/9/2018.	Complied
	b) Conservation status ( <i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.	In summary there was no HCV present in the CU except for buffer zone for Sungai Semanggar branch internal drainage flowing at the boundary of FGVASSB Taib Andak field. The report details the findings of a rapid appraisal of the biodiversity in the estates and addresses the RSPO P&C relevant to biodiversity conservation and HCV. Therein being provided details relating to the following;	
	- Major compliance -	<ul> <li>a) General biodiversity issues</li> <li>b) Watercourses and drainage</li> <li>c) Habitats natural and man-made</li> <li>d) Wildlife</li> <li>e) Ponds and reservoirs</li> <li>f) Wetlands /watercourses</li> <li>g) Legal aspects</li> <li>h) Immediate and long-term effect.</li> </ul>	
4.5.6.2	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:  a) Ensuring that any legal requirements relating to the protection of the species are met.  b) Discouraging any illegal or inappropriate hunting, fishing or	Relevant programme to workers pertaining awareness of HCV areas and RTE observed conducted. Interview with employees noted that awareness programme had been conducted. Employees were aware of  a) Not to capture, harm, kill any wildlife.  b) Disciplinary measures shall be taken if found violating company rules. c) Not to chemicals in riparian buffer zone.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	collecting activities; and developing responsible measures to resolve human-wildlife conflicts.  - Major compliance -		
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.  - Major compliance -  The estate oobserved and implemented the established action plans, including monitoring (patrolling) of the conservation areas by Auxiliary Police. Record of monitoring (patrolling) observed maintained. Observed no monitoring outcomes that requires changed of practices or action plan.		Complied
Criterio	n 4.5.7: Zero burning practices		
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.  - Major compliance -	FGV practices of "Zero open burning" is enforced and elaborated in the Group Sustainability Policy dated May 2019. Also included in the following guidelines;  i. Manual Ladang Sawit Lestari  - Prosedure Kerja Selamat  ii. Manual Sustainability  - Prosedur Kerja Selamat  - Prosedur membancuh Racun di PREMIX  - Pengendalian Bahan Kimia  - Penyediaan tanah tanam semula  The estate adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates.	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	No open burning noted based on the records. The estate adhered to the policy of "Zero open burning" for any replanting. From field visits and	Not applicable



Criterio	on / Indicator	Assessment Findings	Compliance
	there is a significant risk of disease spread or continuation into the next crop.  - Major compliance -	interviews with the workers there is no open burning being practiced in the estate. Thus, the criteria are 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 controlled burning noted based on the records. The estate adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estate. Thus, the criteria is not applicable.	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 -	This is included in the specification of work orders in event of land preparation during a replanting. It is a standard practice in Felda Agricultural Services/FGV. The organisation excluded stages relating to shredding, pulverized and ploughing in the land preparations.	Complied
4.6 Prin	ciple 6: Best Practices		
Criterio	n 4.6.1: Site Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  - Major compliance -	The standard operation procedure for the estate operations is available which is prepared on Group basis. There are levels of the documentation identified as follows;  i. Manual Ladang Sawit LESTARI on reviewed 1/6/12  Sawit pra matang edisi II seksyen 3	Complied
		ii. Manual Ladang Sawit LESTARI reviewed on 1/6/12 Sawit matang edisi II seksyen 4 iii. Manual Ladang Sawit LESTARI 1/6/12	
		Pembajaan sawit edisi II seksyen 5	
		iv. Prosedur Kerja Selamat	



Criterio	n / Indicator		Compliance				
		٧.	Manual Kelestaria	n (Sustainability)			
		Amendments are made should there be requirement to suit the local issues/situation. The Agronomy and Agricultural Services Department, Sustainability Unit, Plantation Head and relevant Head Office personnel including the Regional Controller inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Other mechanism as described below.  FGVASSB Bukit Besar/Taib Andak Estates					
		1	Areas Daily	Action/Activities Supervision by field staff/Assist/Manager Report of daily activities/costings/variation			
		2	Schedule	WA group - digital supervision  Quarterly ESH meeting			
				RC visits on field activities Internal audits by GCAD/SHO			
				Annual EPMC External audit RSPO /MSPO PA visits / Agronomist visits			
				Zone Head / Regional Controller visits			
		3	Medical /health	Monthly check by HA/MA Annual medical surveillance.			
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	The Plar cons	Complied				
	waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of		oadside pit is mad rosion and surface (	e to divert water at slope areas to prevent road damage.			



Criterion / Indicator		Assessment Findings	Compliance
	either soil, nutrients or chemicals Major compliance -	ii.Terraces are constructed inclined towards the terrace wall.	
4.6.1.3	A visual identification or reference system shall be established for each field.  - Major compliance -	All fields are marked and identified. Information like year planting (field no) and the total hectare is shown in all markers. There were displayed in signage at the boundary/corners of every fields. This is observed during the field visit.	Complied
Criterio	n 4.6.2: Economic and financial viability plan		
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.  - Major compliance -	The estate continued to achieve long term economic and financial viability through documented management plan projected to year 2025.  i. A Management Plan including crop forecast, capital expenditure, operational expenditure, general charges, profit and loss covering the period of 2021 to 2025 had been prepared for all the estates as well as the POM and made available to the audit team.  ii. This plan had also included mature area and also for the forecasted FFB production per hectare for the period 2021 to 2025.  iii. All the estates in the management of Felda Agricultural Services had a standard budgeting format. The records were reviewed during the audit. The Business Plan also included a 5-year budget/forecast financial plan (i.e. 2021-2025) with allocation on the following:  - Crop yielding area / Prime mature  - Total mature / Cost/ha  - General charges/upkeep/collection/depreciation  - CAPEX  iv. The component of the budget comprises of the following items;  - Labour statement / Allocation of wages	Complied



Criterion / Indicator			Assessi	men	t Findings			Compliance
	-	<ul> <li>Labour benefit</li> </ul>	summary ,	/ Labo	our reconciliati	on		
	- Yield statement oil palm							
	-	- Summary of ve	ehicle and r	unnir	ng schedule			
	- Job allocation for vehicles / Summary of workshop schedule					kshop runr	ning	
	<ul><li>Summary if budget / Summary of general charges</li><li>CAPEX, oil palm matures and young mature</li></ul>							
	Format of estate summary expenditure is as per the following content Figures were extracted out for reason of confidentiality.							
	Ye	ar	2021	202	2023	2024	2025	
	Ma	ature Ha	Χ	Χ		Х	Χ	
	Im	ımature Ha	Χ	Χ		X	X	
		tal Planted Ha	Χ	X		X	Х	
		B Tons	Χ	X		X	X	
		eld /Ha	X	X		X	X	
		1/mt FFB	X	X		X	X	
	KI	1//Ha	Χ	X	Х	X	X	
	Com	nponent of operati	ing expend	iture	among other i	ncludes;		
		Activitie	es		Activ	ities		
	1	Merumput		9	Sanitasi Poko	ok		
	2	Membaja		10	Sempadan &	ukur		
	3	Parit		11	Menyulam			
	4	Jalan & jambata	ın	12	Penyeliaan a	m		



Criterio	on / Indicator	Assessment Findings	Compliance
		5 Pemuliharaan tanah/air 13 Sanitasi Pokok 6 Mencantas 14 Sempadan & ukur 7 Buruh 15 Penyeliaan 8 Pengangkutan 16 peralatan	
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 -	Taib Andak Estate established a replanting program spanned over a 5-year period till 2025. Details as follows.    Estate 2021 2022 2023 2024 2025   Taib Andak 0 0 0 0 0	Complied
4.6.2.3	The business or management plan may contain:  a) Attention to quality of planting materials and FFB  b) Crop projection: site yield potential, age profile, FFB yield trends  c) Cost of production: cost per tonne of FFB  d) Price forecast  e) e) Financial indicators: cost benefit, discounted cash flow, return on investment  - Major compliance -	This requirement i.e. crop material, crop projection, yield, production cost is available. It is provided in the business management plan shown in item 4.6.2.1 above.  The estate had a format and guideline to calculate the returns on the field operations i.e. Income = sale of FFB (with award of CPO/CPK from the mill) less the expenditure (fixed and direct cost). This format is sighted.	Complied
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.  - Major compliance -	<ul> <li>The estate performance is recorded in the monthly progress report.</li> <li>i. Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein.</li> <li>ii. The management also provides variance report on the performance and reviewed on a monthly basis.</li> <li>iii. The supervisory personnel maintained a daily cost for the field operations.</li> </ul>	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		The meeting involving the Managers sits monthly with the Regional Zone Head for the performance review.	
Criterio	n 4.6.3: Transparent and fair price dealing		
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented.  - Major compliance -	For contract work, the price was determines during the contract negotiation between the contractors and Tender Award Committee and the representative base on value of the projects. All contracts are kept in the office. Reviewed the "Surat Perintah Kerja" no. 820105001-2020/820230501-12-132 between FGV Agri Services Sdn. Bhd (Stesen FGVAS Taib Andak) and Ahmad b. Hashim dated 09/12/2020.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.  - Major compliance -	Verification of contract agreement, records of payment and interview with contractors showed that contracts was fair, legal and transparent and agreed payments w e r e made in timely manner. Reviewed the payment records for contractors as follows:    Month Document no. Date payment   July 350209354 13/08/2021   August 350210038 20/09/2021   September 350210594 14/10/2021	Complied
Criterio	n 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 -	All contractors and FFB suppliers were required to read, understand and sign the Supplier Code of Conduct, FGV Holdings Berhad. In the Supplier Code of Conduct stated the MSPO requirements such as:  1. Business ethics and integrity  2. Safety, Health & Environment  3. Labour Standards	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		<ol> <li>Communication and documentation</li> <li>Sustainability</li> <li>Reporting obligation</li> <li>Reviewed sampled contracts and Supplier Code of Conducts as follows:</li> <li>"Surat Perintah Kerja" no. 820105001-2020/820230501-12-132 between FGV Agri Services Sdn. Bhd (Stesen FGVAS Taib Andak) and Ahmad b. Hashim dated 09/12/2020.</li> </ol>	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor.  - Major compliance -	Reviewed sampled contract and Supplier Code of Conducts includes agreement signed by the contractors and Mill manager with term and condition which includes contractor must adhere to FGV policies and MSPO compliances.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.  - Minor compliance -	As stated in the Supplier Code of Conducts under section 4. Communication and documentation subsection 4.3. Inspection and section 5. Sustainability subsection 5.2 Adherence to Sustainability Policy.	Complied
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 -	As stated in the Supplier Code of Conducts under section 4. Communication and documentation subsection 4.3. Inspection and section 5. Sustainability subsection 5.2 Adherence to Sustainability Policy.	Complied
4.7 Prin	ciple 7: Development of new planting		
Criterio	n 4.7.1: High biodiversity value		



Criterio	on / Indicator	Assessment Findings	Compliance
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 -	Not applicable 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 -		Not Applicable
Criterio	<b>n 4.7.2:</b> 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.  - Major compliance -	Not applicable as no development of new planting.	Not Applicable
Criterio	n 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 -	Not applicable 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,		Not Applicable

...making excellence a habit.™ Page 63 of 120



Criterio	on / Indicator	Assessment Findings	Compliance
	via participatory methodology which includes external stakeholders.  - Major compliance -		
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed.  - Major compliance -	Not applicable 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 -	Not applicable as no development of new planting.	Not Applicable
Criterio	n 4.7.4: Soil and topographic information		
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation.  - Major compliance -	Not applicable as no development of new planting.	Not Applicable
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 -	Not applicable as no development of new planting.	Not Applicable
Criterio	n 4.7.5: Planting on steep terrain, marginal and fragile soils		
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils	Not applicable as no development of new planting.	Not Applicable

…making excellence a habit.<sup>™</sup>



Criterio	on / Indicator	Assessment Findings	Compliance
	shall be avoided unless permitted by local, state and national laws.  - Major compliance -		
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 -	Not applicable 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 -	Not applicable as no development of new planting.	Not Applicable
Criterio	n 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 views through their own representative institutions.  - Major compliance -	Not applicable as no development of new planting.	Not Applicable
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites.	Not applicable as no development of new planting.	Not Applicable
	- Minor compliance -		
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	Not applicable as no development of new planting.	Not Applicable

...making excellence a habit.<sup>™</sup>



Criterio	on / Indicator	Assessment Findings	Compliance
	available Major compliance -		
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 -	Not applicable 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 -	Not applicable 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 -	Not applicable 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.  - Major compliance -	Not applicable as no development of new planting.	Not Applicable
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 -	Not applicable as no development of new planting.	Not Applicable



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

Criterio	on / Indicator	Assessment Findings	Compliance	
4.1 Principle 1: Management commitment & responsibility				
Criterio	n 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established.  - Major compliance -	FGV has established Group Sustainability Policy. Refer policy no. FGV/SED/POL/001, revision 4 dated 17/11/2020 approved by the Board of Directors.	Complied	
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation.  - Major compliance -	In the Group Sustainability Policy stated that FGV will continuously improve the quality of their products and services by adopting the best possible approach to enhance productivity and profitability by optimizing resource and operational efficiencies, while eliminating or minimizing negative impact on people and environment by:  1. Promoting economic growth  2. Respecting human rights  3. Protecting the environment		
Criterio	n 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 -	The Sustainability, Compliance and Certification Department has established annual internal audit plan for all the mills and estates. Latest internal audit was conducted on $16-18/08/2021$ by Internal Auditor from SCCD. During the internal audit, 12 NCR were issued by the auditor.	Complied	



Criterio	on / Indicator	Assessment Findings	Compliance
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.  - Major compliance -	FGV has established Standard Operating Procedure for Internal Audit. Refer document no. FGV/GSD-SCCD/SOP/04 dated 03/09/2020.  Latest internal audit was conducted on 16 – 18/08/2021 by Internal Auditor from SCCD. During the internal audit, 12 NCR were issued by the auditor. The audit report was documented in "Laporan Audit Dalaman RSPO/MSPO FGV".	Complied
4.1.2.3	Reports shall be made available to the management for their review.  - Major compliance -	The internal audit report was documented and made available for management review. As evidence, all findings from internal audit was responded by mill management within the timeframe stipulated in the Audit Procedure.	Complied
Criterio	n 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 -	Latest management review meeting was conducted on 01/11/2021 chaired by the Mill Manager. Reviewed the minutes meeting agenda discussed matters such as:  1. Internal Sustainability Audit Report  2. Customer feedbacks  3. Agronomist visit report  4. Changes in management/operation  5. Recommendation for improvement	Complied
Criterio	n 4.1.4 – Continual Improvement		
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.	The mill has established an improvement plan mainly on environmental and social issues with details as follows. The mill	Complied



Criterio	Criterion / Indicator		Assessment Findings		
	- Major compliance -	documented the program in the Capital Expenditure 2021 - 2025 and discussed in the Management Meeting.			
			Projects	Details	
		1	Operation	Expansion of loading ramp for ramp improved management budgeted at RM 120K to be initiated in 2022.	
		2	Environmental	Installation of membrane filter for the ETP to enhance the BOD lowering level to meet DOE standard RM 1M planned to commence in 2022.	
		3	Environmental	Aeration Modification 2021	
		4	Environmental	On-line desludging system RM100K	
		5	Operations	Construction of roofing at the EFB shredded station to improve the storage capacity budget of RM140K.to be launched in 2022.	
		6	Safety	Memastikan kemalangan sifar di dalam kilang tahun 2021	
		7	Social	Maulidul Rasul Celebration	
		8	Social	Yasin Reading Ceremony to instil spiritual values among the community.	
		9	Social Social	Raya Celebration Annually Employees birthday celebration	
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.  - Major compliance -	Emplounde will	oyees were brid rstanding during t be informed of	upon confirmation of any new projects. efed of any new development in basic the weekly briefings. The management team such development during the monthly s. Dissemination of information by the RC	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		office and SCCS are transacted during the monthly Managers meetings and emails.	
4.2 Prin	ciple 2: Transparency		
Criterion	4.2.1 – Transparency of information and documents relevant to	MSPO requirements	
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.  - Major compliance -	FGV has established Standard Operating Procedure and documented in "Komunikasi, Penglibatan dan Rundingan". Refer document no. FGV/ML-1A/L2-Pr12, issue 0 dated on 01/06/2016. Request for information and response is handle based on procedure. The procedure covering the internal and external parties. As per clause 6.2.3 "Jangka masa Untuk Komunikasi Luar" (Timeline to Response) were divided into two: -  1. Within 2 weeks from date received information which require response.  2. Within 1 week from completion of investigation.  Sighted at Mill notice board the Standard Operating Procedure is displayed in Bahasa Malaysia.	Complied
4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.  - Major compliance -	Standard Operating Procedure and documented in "Komunikasi, Penglibatan dan Rundingan". Refer document no. FGV/ML-1A/L2-Pr12, issue 0 dated on 01/06/2016 under section 7.0 'Rekod Terlibat", publicly available document as follows:  • Land Title  • Safety and Health Plan  • Environment and Social Management Plan.  • HCV report.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
		<ul> <li>Pollution Prevention Plan</li> <li>Record of complaint and grievances.</li> <li>Continuous Improvement Plan.</li> <li>Human Rights Policy.</li> <li>List of stakeholders</li> <li>Communication procedure</li> <li>OSH Minute Meetings</li> <li>Monthly Management Minutes Meeting</li> <li>Internal Memo and Circulars</li> <li>Requests for official documents through the Mill office will have to go through the Manager/Assistant in charge, whom will make the decision as to whether the information can be shared to or viewed by the person requesting the information or document.</li> </ul>	
Criterion	1 4.2.2 – Transparent method of communication and consultation	on	
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders.  - Major compliance -	FGV has established Standard Operating Procedure and documented in "Komunikasi, Penglibatan dan Rundingan". Refer document no. FGV/ML-1A/L2-Pr12, issue 0 dated on 01/06/2016.  This is including request and consultation with internal and external parties. The procedure stated:  1. Internal communication  a. Management to employee:  - morning muster  - memo and surat pekeliling dalaman  - poster and notice board	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		- continues campaign  b. Employee to management  - suggestion box  - morning muster  - through employee representative  - site visit from manager  2. External communication  - policies being circulated with the stakeholders  - report to the environmental department and DOSH	
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> .  - Minor compliance -	The mill has appointed the Assistant Executive as Social Officer as per appointment letter no. (05)4004/RSPO/E1 dated 31/01/2021 signed by the Mill Manager.	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained.  - Major compliance -	The mill has established list of stakeholders including internal and external stakeholders.  As for Movement Control Order and National Recovery Plan in Malaysia restricted the meeting involving large no of person, the mill had made an initiative to provide information and have feedbacks from the stakeholders by sending email/letter.  Reviewed the letter regarding Briefing on the new Group Sustainability Policy ver. 4 as per letter no. (1)4004/KUL/RSPO-E1.1.1 dated 01/10/2021 and acknowledgement of receiving by the stakeholders.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.  - Major compliance -	FGV has established Standard Operating Procedure for traceability and documented in Standard Operating Procedure for RSPO Supply Chain Certification. Refer document no. FGV/GSD-SCCD/SOP/007 ver. 1.0 dated 07/01/2021.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system.  - Major compliance -	The Management team on harvesting holds the responsibility on regular inspection of traceability system. Periodical inspections also being conducted through Regional Controller, Internal Audit and Agronomist visit.  The effectiveness of the monitoring will evidence in the internal audit and visit report findings.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system.  - Minor compliance -	As stated in the Standard Operating Procedure RSPO Supply Chain Certification, refer document no. FGV/GSD-SCCD/SOP/007 ver. 1.0 dated 07/01/2021 under section 5.0 – Responsibility stated that the SPO SCC Committee were responsible to monitor all activity involve in the supply chain certification system.  The mill management has established SPO SCC committee as per appointment letter no. (03)RSPO/SCCS dated 01/01/2021 signed by the Mill Manager.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.  - Major compliance -	As stated in the Standard Operating Procedure RSPO Supply Chain Certification, refer document no. FGV/GSD-SCCD/SOP/007 ver. 1.0 dated 07/01/2021 under section 7.0 - Rekod, among the records to be maintained according to the procedure include:  1. FFB Receipt summary from MPR and SAP 2. Weighbridge ticket 3. Dispatch of CPO/PK – delivery instruction/sales order, weighbridge ticket, delivery order	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		e. Daily production report @ daily figure from MPR and Steviewed the sampled records of CPO dispatch with Disport H00000339 dated 08/11/2021 and PK dispatch with lote no. L00000152 dated 05/08/2021.	patch not
4.3 Prin	ciple 3: Compliance to legal requirements		
Criterio	n 4.3.1 – Regulatory requirements		
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.  - Major compliance -	A mechanism to ensure compliance to legal and other requirement has been documented in Manual Lestari established from the Head Office level.  i. The Legal Department will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance.  ii. Thereafter the estates and mill where applicable will be notified via email on the changes/update of LORR for implementation.  a. Licenses/permit viewed as complied by the mill for the legislative requirement among others viewed were as follows.	
		1 MPOB license no 500161-100-4000. 31/0 2 Jabatan Alam Sekitar no 004583 31// 3 Suruhanjaya Tenaga - Perpasangan In Pro 4 Meterology Corporation - W/bridge In pro 5 Back Pressure steam receiver PMT 10501 11/0	idity 03/22 /7/22 ogress ogress 07/22

…making excellence a habit.<sup>™</sup>



Criterio	on / Indicator		Assessment Findings		Compliance
		b. Cl So H w Pl c. M H do			
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register.  - Major compliance -	The orequing sector changing its plate a) Peb Eicon Fad) We e) El	Complied		



Criterio	on / Indicator	Assessment Findings	Compliance
		<ul> <li>f) Immigration Act 1959</li> <li>g) Occupational Safety and Health Act 1994</li> <li>h) Employment Act 1955</li> <li>i) Industrial Relations Act 1967</li> <li>j) Children and Young Persons (Employment) Act 1966</li> <li>k) MPOB Regulations (Licensing) 2005, EQ (Prescribed Premise) (Crude Palm Oil) Regulations 1977</li> <li>l) Industrial Code of Practice for Confined Space 2010</li> <li>m) MPOB licensing Regulation 2005.</li> <li>n) Akta Polis 1967</li> <li>o) Akta Pencegahan Dan Pengawalan Penyakit Berjangkit 1988</li> <li>p) Akta Std Min Perumahan Dan Kemudahan Pekerja 2019 (Pindaan)</li> <li>q) Perintah Gaji Minima 2020</li> </ul>	
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 -	The Legal Department will update changes and communicate to the mill and estates via email. Thereafter the operating units will view the relevancy and adopt into the compliance list. This is also assisted via the Region Office and through personnel from SCCD during the site visits and audits.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.  - Minor compliance -	Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office. This correspondence was sighted via an email issued from Head Office for the operating units to update and comply where applicable. The PIC for legal compliance is Pn Norafiza Zahari an Assistant	Complied



Criterion 4.3.2 – Lands use rights	Executive appointed via letter dated 10/08/2021 issued by the Manager.	
Criterion 4.3.2 – Lands use rights		
<ul> <li>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</li> <li>Major compliance -</li> </ul>	FGVPISB did not acquire land from landowners. The land was leased to FELDA by the government. FELDA give the right to use the land to FGVPI.	Complied
	There were no issues of land disputes. There was no evidence that the oil palm milling activities is diminishing the land use rights of other users.	
The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.  - Major compliance -	The mill land ownership for 13.09 ha as per agreement entitled "Surat Perjanjian Antara Lembaga Kemajuan Tanah Persekutuan (FELDA) dan Felda Palm Industries Sdn Bhd Rancangan: Felda Taib Andak" dated 25/11/1996 and "Perjanjian Pajakan Tanah (LLA) dengan FELDA" dated 01/11/2011.	Complied
Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.  - Major compliance -	The FGV Kulai POM boundary were demarcated with fences.	Complied
Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC).	FGV has established procedure to handle any land dispute and recorded in "Pengenalpastian dan penyelesaian pertikaian tanah". Refer document no. ML-1A/L1-Pr10(0) dated 01/06/2016. No land dispute was recoded for Kulai POM.	Complied
- Minor compliance -		



Criterio	on / Indicator	Assessment Findings	Compliance
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.	The land is legally owned by FELDA and leased to FGVPI Sdn Bhd. The existing land is not encumbered by any customary land rights.	Not applicable
	- Major compliance -		
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available.	The land is legally owned by FELDA and leased to FGVPI Sdn Bhd. The existing land is not encumbered by any customary land rights.	Not applicable
	- Minor compliance -		
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available.	The land is legally owned by FELDA and leased to FGVPI Sdn Bhd. The existing land is not encumbered by any customary land rights.	Not applicable
	- Major compliance -		
4.4 Prin	ciple 4: Social responsibility, health, safety and employn	nent condition	
Criterio	n 4.4.1: Social Impact Assessment (SIA)		
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.  - Minor compliance -	SIA was conducted by Plantation and Sustainability Department (PSD) as per "Laporan Penilaian Impak Sosial KS Kulai". Refer document no. 1/2018 dated 09/08/2018	Complied
	Third Compilation	The assessment has involved the participation of stakeholders such	
		as internal workers, teacher, surrounding communities and contractor.	



Criterio	n / Indicator	Assessment Findings	Compliance
		The negative impacts and positive impacts that raised during the assessment were incorporated into the management plan.  The mill has established Social Management Plan. Reviewed the management plan dated 30/10/2020.	
Criterior	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 -	Procedures for Complaints and Grievances was documented in Menangani Aduan dan Rungutan. Refer document no. ML-1A/L2-Pr13 issue 0 dated 01/06/2016. This procedure covers:  a. Problem with the management  b. Housing and Workers Housing Problem  c. Problem involving estate management  d. Complaint & grievance facilities  e. Complaint/grievance involving estate workers welfares  f. Freedom of speech in welfare meeting  FGV has established Whistleblowing Policy. Refer document no.  FGV/GGD/POL/001, rev. 8.0 approved by the Board of Directors on 17/11/2020.  Policy of whistle-blower policy was established in the sustainability manual 1A dated 1/8/06. The issues emphasized in the policy were Whistleblowing e-form at www.fgvholdings.com if you wish to report or raise concerns related to abuse of power, fraud, bribery, sustainability issues and other misconducts.  The policy will ensure identity will be protected. In additional the company has established a hotline number 1800-88-8717 and alert mail alert@fgvholdings.com.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.  - Major compliance -	Kulai POM records all complaints or requests from the stakeholders in Grievances Logbook. No grievances were recorded at the time of the audit.  For defects of housing facilities, the report was recorded in "Borang Aduan Kerosakan Rumah".  Based on the records of complaints lodged, the actions taken by the management were appropriate and timely manner.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.  - Minor compliance -	The complaint record book was available in the office and security post, where the stakeholders can easily access in order to lodge their complaint. There was no complaint lodged from any external stakeholders since the last assessment.	Complied
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.  - Minor compliance -	Interview with internal and external stakeholder during stakeholder consultation found that they were aware of the complaint procedure and were briefed by the management during stakeholder meeting.	Complied
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.  - Major compliance -	The records of complaint for the past 24 months (since November 2019) were available in the complaint records book.	Complied
Criterio	n 4.4.3: Commitment to contribute to local sustainable developr	nent	
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.	The mill is committed and have contributed to local development. The contribution made to the internal and external stakeholders. As evidence, the mill has contributed Food Basket to workers who have been quarantine due to COVID 19.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	- Minor compliance -		
Criterio	n 4.4.4: Employees safety and health		
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.  - Major compliance -	<ul> <li>The Group Occupational Safety &amp; Health Management Policy had been established and implemented. There are 3 levels of safety policy engaged by the Mill.</li> <li>a) Dasar Kesihatan Keselamatan Dan Alam Sekitar dated on 15/10/2016 signed by the FGV President/CEO.</li> <li>b) Pernyataan Polisi Kesihatan Dan Kesihatan Keselamatan signed by CEO dated 05/11/2021</li> <li>c) Another level of the policy is issued by the CEO of Felda Palm Industries on 01/01/2021.</li> <li>Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees &amp; contractors &amp; visitors. The Policy is implemented among others through the OSH activities by the on-site Safety Health Officers and monitored by OSH/Plantations Sustainability Department from Head Office.</li> </ul>	Complied
4.4.4.2	<ul> <li>The occupational safety and health plan should cover the following:</li> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risk of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ol> <li>i. All employees involved are adequately trained on safe working practices;</li> </ol> </li> </ul>	<ul> <li>a. The Policy has been established with details elaborated in 4.4.4.1 above.</li> <li>b. The risk of all operations was assessed and documented under HIRARC. The HIRARC for the mill operations was last reviewed on Jan 2021 initiated in 2016. HIRARC for the following stations/operations/activities among others were sighted;</li> <li>Areas/Activities</li> <li>Areas/Activities</li> <li>Weighbridge/Ramp</li> <li>Engine Room</li> </ul>	Complied



on /	Indicator		Assessment Findings					Compliance
	<ul> <li>ii. All precautions attached to products should be properly observed and applied;</li> </ul>		2	Fruit Handling	10	Product Dispatch	storage/	
d)	The management shall provide the appropriate PPE at the place		3	Continuous sterilizer	11	Laboratory		
	of work to cover all potentially hazardous operations as		4		12	Water treatr	ment	
	identified in the risk assessment and control such as Hazard		5	3.4	13	Effluent Trea	atment Pond	
	Identification, Risk Assessment and Risk Control (HIRARC).		6		14	Office		
e)	The management shall establish Standard Operating Procedure		7	Electrical	15	Workshop		
- ,	for handling of chemicals to ensure proper and safe handling		8	Working at height	16	General Mill	Work	
f)	(Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.  The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations	d	the prod 4.4. The	ining for employees are period employees handling checedures. Details of the 1.6.1.  In mill issued PPE to all it wided are safety boots (2.6.1)	emicals trainin ts emp	s and other g organised bloyees. The	safe working as shown in common PPE	
g)	and collective agreements.  The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken	1	cott type for emp	ton gloves. Other specified e of work such as harness ( the cage handlers and wo ployees working at high no lance for the following;	PPE i. (workii vorksh	e. are issued fing at height), op personnel,	for designated leather gloves lear plug for	
	shall be recorded.			Name M/s	PPE		Date	
h)	Accident and emergency procedures shall exist and instructions		1	W/b Operator	Safety	shoes	07/10/21	
ĺ	shall be clearly understood by all employees.		2	Aishah- GW	Safety	shoes	16/11/20	
i)	Employees trained in First Aid shall be present at all mill		3	Rashid - Driver	Safety	shoes	05/11/20	
٠,	operations. First Aid equipment should be available at each		4			gloves	29/09/21	
	worksite.		5	Rosman - Grader	Cotton	gloves	01/11/21	
			6			shoes	07/10/21	



Criterion / Indicator		Assessment Findings				Compliance
j) Records shall be kept of all accidents and be reviewed		7	Fikri - Lab	Cotton gloves	20/10/21	
periodically at quarterly intervals.  - Major compliance -		8	Nordin - Boiler	Leather hand glove	10/10/21	
		9	Musa - Oil room	Leather hand glove	20/10/21	
	e.	Pros 036 sho che	P of handling of chem sedur Kerja Selamat - Per dated 14/7/10 and Manu wn requirement & selection micals hazards, selection micals storage and handl	ngendalian Bahan Kir ual Operasi Kilang Sa ction of chemicals, a n of supplier and tra	mia ref FPI-PK- wit. Therein is assessment of	
	g.	for	e management appointed the ESH committee. The gional Controller via letter	e appointment was		
		/site	nmunications on safety of supervision/dialogue/be safety meeting was he etings in a year. The date and verified below;	riefing during the weld 3 monthly having	veekly muster. g a total of 4	
		1 2	Date         Attendee           21/9/21         10           15/6/21         10	Date 3 24/02/21 4 23/11/20	Attendee 13 13	
		1.	e agenda discussed amon Prestasi keselamatan, kes Lapuran Kemalangan	•		
			Lapuran Pemeriksaan Kes	selamatan Stesen		



Criterion / Indicator	Assessment Findings	Compliance
	<ol> <li>Laporan audit QOHSE</li> <li>PPE inspection/CHRA</li> <li>Legal compliance</li> <li>Latihan &amp; Program keselamatan</li> <li>Environmental Issues and Compliance Status</li> <li>Other matters</li> </ol>	
	<ul> <li>h. Accident and emergency procedures are available. There is a formation of ERP Team &amp; ERP for all the identified incidences. The organisation chart for the ERP team was appointed and displayed for information of the employees. Drill for fire ERP was latest organised on 01/11/21. Other ERP were briefed during the weekly gathering and explained during the ad-hoc briefing at individual stations. These training are recorded in the logbook maintained at the operations site.</li> <li>i. Training on the 1<sup>st</sup> aid was made on 01/11/2021 together with the BOMBA fire prevention session. Other details as per training</li> </ul>	
	j. Records of all accidents are kept. Accident incidences are reviewed during safety meetings. Accidents incidences for 2020 were recorded below.    Cases   LTI   Non LTI   JKKP Submission   1   5   52   0   24/01/2021     Most of accidents are related to maintenance team while performing repair work at process stations. Investigations are	



Criterio	on / Indicator	Assessment Findings	Compliance
		made where required JKKP 6 were submitted to DOSH. HIRARC was reviewed accordingly.	
Criterio	n 4.4.5: Employment conditions		
4.4.5.1	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.  - Major compliance -	FGV has established Group Sustainability Policy. Refer policy no. FGV/SED/POL/001, revision 4 dated 17/11/2020 approved by the Board of Directors.  Under section 5.2 Respecting Human Rights stated the company commitment to respect human rights by upholding international human rights principles and standards as encapsulated in the Universal Declaration of Human Rights (UDHR), and other applicable internal human rights treaties, subject to the laws and regulations of the countries and which territories of FGV Group operates  The policy was communicated to the employee through morning briefing, training and displayed at designated places in the mill.	Complied
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.  - Major compliance -	As stated in the Group Sustainability Policy. Refer policy no. FGV/SED/POL/001, revision 4 dated 17/11/2020 under section 5.2.1 Equality and Non-Discrimination.  The section stated that no person shall be subjected to any discrimination in employment including hiring, compensation, advancement, training, disciplinary action, termination or retirement on the basis of gender, race, religion, age, disability, sexual orientation, gender identity, nationality, political opinion, social group, ethnic origin, reproductive rights or other forms of discrimination.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.  - Major compliance -	The management has established employment contract for all workers and contractors' workers. All the terms and conditions stated in the employment agreement were as per Labour Act 1955, Minimum Wage Order 2020 (amendment) latest Agreement between FGV Palm Industries Sdn. Bhd. and "Kesatuan Pekerja – Pekerja and FGV Palm Industries Sdn. Bhd. (Semenanjung) no. 031/2020 dated 31/01/2020.  Reviewed the employment contract, payslip, EPF and SOCSO contribution for the month of February, May and October 2021, for workers with ID no. as follows:  1. 1206003 2. 1206019 3. 1210519 4. 1204324 5. 1203822 6. 1202712 7. 1204104  The salary payment was found accordance with the Minimum Wage Order 2020.	Complied
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.  - Minor compliance -	The mill has 7 contractor workers from Orlee Resources. Reviewed the payslip for the month of Feb, March, May, and September for employee with ID no. as follows:  1. 030104011589  2. 030110011907  3. 620103015975	Minor Non- conformity



Criterio	n / Indicator		Assessment Findings						
		contractors' wo	Noted during document review, the SOCSO contribution for the contractors' workers were not as per Employees' Social Security Act 1969 (Act 4). Reviewed the contribution as follows:						
		Name/ID no.	Month	Salary Range	SOCSO contribution as per act	Actual SOCSO Contribution			
		Muhammad Raffizal Haqimi Mohd Rahmad 03011001X XXX	Sept 2021	1300 - 1400	30.40	28.10			
		Latiff b. Nanang 62010301X	Sept 2021	1800 -	41.60	28.10			
		XXX	May 2021 Mar 2021	1700 - 1800 1300 - 1400	39.40	37.10 25.90			
4.4.5.5	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.  - Major compliance -	FGV Plantations (Malaysia) Sdn Bhd has established Labour Employment Report system for all the data of their workers.  The report stated the Name, Worker ID, IC No / Passport No, Year Permit, Date of Birth, Citizenship, Gender, Vendor Name, Calling Visa No, Date Joined, Date Arrival, Status.					Complied		
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					contract for all and conditions	Complied		



Criterio	on / Indicator	Assessment Findings	Compliance
	contract shall be made available for each and every employee indicated in the employment records.  - Major compliance -	stated in the employment agreement were as per Labour Act 1955, Minimum Wage Order 2020 (amendment) latest Agreement between FGV Palm Industries Sdn. Bhd. and "Kesatuan Pekerja – Pekerja and FGV Palm Industries Sdn. Bhd. (Semenanjung) no. 031/2020 dated 31/01/2020.  Reviewed the employment contract, for workers with ID no. as follows:  1. 1206003 2. 1206019 3. 1210519 4. 1204324 5. 1203822 6. 1202712 7. 1204104	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.  - Major compliance -	The mill management has implemented the Thumb Print system to record the working hours and overtimes carried out by the workers.	Complied
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.  - Major compliance -	Normal working hours is 8 hours/day. Total monthly working hours is 208 hours. Verified the pays lips, the payment and calculation of overtime well distributed.  The overtime rate after 8 hours daily rated is: Process  Normal working – daily rated / 8 hours x 1.5  Restday - daily rated / 8 hours x 2.0  Public holiday – daily rated / 8 hours x 3.0	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
		<ul> <li>The overtime rate after 8 hours monthly rated is: Workshop</li> <li>Mon - Sat – flat rate</li> <li>Sunday – flat rate x 2.0</li> <li>Public holiday – flat rate x 3.0</li> </ul>	
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 -	Salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker. Workers interviewed confirmed that they are being paid more than the stipulated minimum wage and that they understand all the deductions being made.  Documented pay slip was distributed to individual workers on the day of payment. The payslip and the inputs were reviewed to confirm the wages and overtime is in line with legal requirements of Employment Act 1955. Reviewed payslip, EPF and SOCSO contribution for the month of February, May and October 2021, for workers with ID no. as follows:  1. 1206003  2. 1206019  3. 1210519  4. 1204324  5. 1203822  6. 1202712  7. 1204104	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional	All local workers, staffs and executives, all of them are covered under EPF & SOCSO as required by the Malaysian Laws and Regulations.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	development, medical care provisions and improvement of social surroundings.  - Minor compliance -	Among other benefits offered to the employees according to the latest Agreement between FGV Palm Industries Sdn. Bhd. and "Kesatuan Pekerja – Pekerja and FGV Palm Industries Sdn. Bhd. (Semenanjung) no. 031/2020 dated 31/01/2020 as follows:  1. Housing allowance 2. Hardship allowance 3. Responsibility allowance 4. Shift allowance 5. Head of department allowance 6. Laundry allowance 7. Motorcycle allowance 8. Regional allowance.	
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.  - Major compliance -	Housing is provided to workers with basic amenities. Water and electricity are supplied by public domain. There are complete facilities such surau, bathroom and kitchen.  As per section 41.2 and 41.3 of latest agreement between FGV Palm Industries Sdn. Bhd. and "Kesatuan Pekerja – Pekerja and FGV Palm Industries Sdn. Bhd. (Semenanjung) no. 031/2020 dated 31/01/2020, water bill is subsidized up to maximum RM15/month whereas electricity bill is fully borne by the employees (occupants).	Complied
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.  - Major compliance -	As stated in the Group Sustainability Policy. Refer policy no. FGV/SED/POL/001, revision 4 dated 17/11/2020 under section 5.2.5 Preventing Harassment and abuse.  In the policy stated the FGV group shall not tolerate any form of harassment and abuse including physical, sexual, physiological or verbal. Everyone shall be treated with respect and dignity.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.  - Major compliance -	As stated in the Group Sustainability Policy. Refer policy no. FGV/SED/POL/001, revision 4 dated 17/11/2020 under section 5.2.2.9 stated that FGV Group recognizes and respects employees' rights to freedom of association and collective bargaining. Reviewed the latest agreement between FGV Palm Industries Sdn. Bhd. and "Kesatuan Pekerja – Pekerja and FGV Palm Industries Sdn. Bhd. (Semenanjung) no. 031/2020 dated 31/01/2020.	Complied
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.  - Major compliance -	As stated in the Group Sustainability Policy. Refer policy no. FGV/SED/POL/001, revision 4 dated 17/11/2020 under section 5.2.2.4.  The policy stated while FGV is committed to employ only person with the age of 18 and above, FGV recognizes that Malaysian laws allow for young person to be engage in certain forms of employment.	Complied
Criterion	4.4.6: Training and competency		
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.  - Major compliance -	The annual training program has been established and significantly covers all aspects of the MSPO requirement. Additional subjects include mill operating procedures, parameters of mill produce, machinery maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects and assisted by SCCD personnel. The following topics included in the annual training program 2020/21 among others are shown below;	Complied



Criterion / Indicator	Assessment Findings				Compliance		
		Subj	ects		Sub	jects	
	1	OSH Act & 1994	regulations	10	Water treat	ment	
	2	Environmenta 1974	al Quality Act	11	HCV & training	Biodiversity	
	3	USECHH 2000	0/HIRARC	12	NADOPOD/	HIRARC	
	4	OSH Com function	mittee &	13	5S /LOTO		
	5	Workplace ins	spection	14	Chemical m	anagement	
	6	First Aid		15	Hearing cor	nservation	
	7	SW compliand		16		ng procedure	
	8			17		ment Plant	
	9	Working at he	eight	18	Environ Ma	nagement	
	Reco	ords of training	for Kulai Palm	Oil N	Iill are showr	n below.	
		Date	Subject			Attendee	
	1	04/03/21	Mill operation			11	
	2	09/03/21	Mill operation			10	
	3		DOE complia			4	
	4		CPO / CPK q			9	
	5		Dialogue wit			4	
	<u>6</u>	16/10/21 29/09/20	W/shop mec Integrity Enh			10	
	8	27/07/20	ROLEK parts			1	
	9	26/08/20	Basic Pump S			1	
	10		Mill operation			11	
	11		BOMBA - fire			Entire	

...making excellence a habit.™ Page 92 of 120



Criterio	on / Indicator			Assessment Findings		Compliance
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 -	establ station Includ enviro manag trainin proces from	ished. The dens, subjects, and this property of the dense	AESP Authorized Entrance  AESP Authorized Entrance  Workshop Operations  Workshop Operations  Workshop Operations  Fire Drill  Mill Inspection – Briefing  MSPO Awareness  DOE compliance  MSPO/RSPO SCC  Dialogue with - Zone Head  Chemical handling  for the mill 2020/21 training proceedings of the training needs included and employees' group.  Ogram are subjects related to enafety & health policy, schaironmental responsibility, HCV handling, mill stations operations, workshop management. etc. To distribute training program.	nvironment e.g. eduled waste & Biodiversity ons, control of The compilation	Complied
4.4.6.3	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.	This is progra	Complied			



Criterion / Indicator		Assessment Findings Compliance
	- Minor compliance -	
4.5 Prin	ciple 5: Environment, natural resources, biodiversity and	ecosystem services
Criterio	n 4.5.1: Environmental Management Plan	
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.  - Major compliance -	There is a <i>Dasar Alam Sekitar</i> for the mill issued and endorsed in 20/11/17 by the <i>Ketua Pegawai Eksekutif</i> of FPI. Above this policy is another policy relating to environmental engaged by FGV Holdings. Therein the policy among others stated that the Company is committed;  a) to protecting the environment and conserving biodiversity through sustainable development.  b) Abide by all legislative requirement  c) Manages environmental risk and providing reasonable resources to minimise risk and pollution to environment
		d) Continuing and improving efficiency towards enhancing environment.
4.5.1.2	The environmental management plan shall cover the following: <ul><li>a) An environmental policy and objectives;</li><li>b) The aspects and impacts analysis of all operations</li></ul>	Policy is available, and objectives stated therein. Among others the objectives are to comply with DOE regulatory requirement. Initiative in plan as tabled below;
	- Major compliance -	Projects Details  1 Operation Expansion of loading ramp for ramp improved management budgeted at RM 120K to be initiated in 2022.
		2 Environmental Installation of membrane filter for the ETP to enhance the BOD lowering level



Criterion / Indicator			Compliance			
		3 4 5	Environmental	to meet DOE standard RM to commence in 2022.  Aeration Modification 2021 On-line desludging system Construction of roofing shredded station to in storage capacity budget of be launched in 2022.	RM100K at the EFB nprove the	
		esta reco ope spil	e environmental ablished for the meption, sterilisation power gellage, ruptured, ef k. The list was rev			
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.  - Major compliance -	acti poll imp	e mill monitors asportions. This plan lution and emission and emission to the environmerised below.	Complied		
		1	Environmental concerns Water Quality	Solution Procedure/Action Plan Continuous monitoring water quality at identified points of river for detection of quality/pollution Analysis made at certified laboratory	River, Water Treatment Plant,	



Criterio	n / Indicator		Compliance		
		3	,	Advisory/guidance from Health Ministry  Adherence to the legislative requirement on boiler emission Prohibition of open burning Fibre and shell are used as fuel in the boiler furnace Monitoring of CEMS system  Scheduled wastes are managed in accordance with the regulatory requirements.  Boiler operation mill complex  Somplex  Source of generation / store	
		The mo Ma	cords of periodica ese were the ev nitored. The pl nagement review re discussed.		
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan.		ails are included nmarized below:	in the continual improvement plan. Details a	Complied
	- Minor compliance -		Projects	Details	
		1	Operation	Expansion of loading ramp budgeted at RM 120K planned 2022.	
		2	Environmental	Installation of membrane filter at ETP for BOD lowering level of DOE standard RM 1M planned in 2022.	
		3	Environmental	Aeration Modification in 2021	
		4	Environmental	On-line desludging system RM100K	



Criterio	n / Indicator	Assess	ment Findings	Compliance
		statior budge	ruction of roof at EFB shredded n to improve the storage capacity et of RM140K.in 2022.	
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives.  - Major compliance -	A training program is availar revised as per the manage programme are subjects relisted below;  a) Environmental Quality Act b) Environmental, safety & h c) ERP Oil /chemical spill d) Scheduled waste manage e) Environmental responsibi	Complied	
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.  - Major compliance -	(Environmental Performance	pollution performance air / scheduled waste	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		In addition, environmental issues were also discussed during the quarterly ESH meetings and also briefed during the weekly muster.	
Criterio	n 4.5.2: Efficiency of energy use and use of renewable energy		
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period  - Major compliance -	The monitoring is recorded in environment performance indicator-electricity generated by steam turbine tabulated for the financial year Jan-Dec. It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt FFB. A monthly record on energy consumption for both renewable and non-renewable sources were also maintained documented. It is monitored to optimize use of renewable energy. The data is compiled for comparison and control for future improvement with aim of gradual reduction particularly diesel.  Under the annual energy management plan 2020/21 the mill aimed for reduction plan among others;  i. Educate workers on fuel saving practice  ii. Avoid leakages during vehicles maintenance.	Complied
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.  - Major compliance -	The mill records the following data and tabulated the ratio against the FFB processed to determine the efficiency of their operations; i. All the diesel used (non-renewable) for the mill operations ii. Fibre/shell used (renewable)  The diesel consumption/mt FFB in 2020/21 is shown below. Baseline is 0.50L/mt FFB	Complied



/ Indicator		Assessme	ent Finding	js –	Compliance
		20	20		
	Month	FFB processed	Diesel /L	Diesel /FFB	
	Jan	4800	3258	0.68	
	Feb	12650	5489	0.43	
	Mac	9450	6166	0.65	
	April	16230	9790	0.60	
	May	11900	7992	0.67	
	June	14600	7928	054	
	July	16380	9220	0.56	
	Aug	15650	12424	0.79	
	Sept	14040	15221	1.08	
	Oct	12520	9573	0.76	
	Nov	12030	10844	0.90	
	Dec	8970	7168	0.80	
	Total	149220	105073	0.70	



Criterio	n / Indicator			Assessme	nt Findings	<b>5</b>		Compliance			
		break	down, ge	20 FFB processed 4800 12650 9450 16230 11900 14600 16380 15650 14040 12520  to weather condineset breakdown as Bratio performan							
4.5.2.3	The use of renewable energy should be applied where possible.  - Minor compliance -	proce	ss system es for mult	shell are used in t n. Surplus quantit ti purposes or sold mulching.	y of shell/fil	ore are deliver	red to	Complied			
Criterion	1 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 -	The \mitiga The c	FGV Kulai POM had identified all wastes and sources of pollution. The Waste Management Action Plan 2021 were established to mitigate and control the identified wastes and source of pollution. The common significant environmental receptors for the estates and mill operations among others as summarized below;								

# bsi.

Criterion / Indicator	Assessment Findings	Compliance
	Receptor Sources	
		and
	particulate), vehicle & generator (smoke gases), anaerobic processes (ETP, EFB dumpi	
		119)-
	2 Water Cleaning water/run-off/process station wa	iters
	(hydro-cyclone /sterilizer condensate/clarifica	ation
	waste) & boiler quenching water and blow do	own
		and
	industrial/process waste.	
	All waste and pollution are identified and documented in the Management Plan and Pollution Prevention Plan Financial 2021 reviewed annually. The waste generated from the mill/exoperations as shown below:	Year
	Type of waste Details	
	Scheduled Spent IPA, hexane, filter, lubrica hydraulic oil, grease, used batteries	nts,
	2 Domestic rubbish from the mill/estate complex employees' quarters	and
	3 Industrial Fiber, palm kernel shell, boiler ash, so	rap
	waste iron	
	4 Sewage Sewage from housing/office complex	
	The pollution identified from the mill/estate activities:	
	Type of waste Details	



Criterio	on / Indicator			Assess	sment Findings		Compliance
		2	Black smo  Odor & ga  Leakage o	ises	Emission Boilers/vehicles/engin Activities from t treatment Storage & vehicle mai	the effluent	
4.5.3.2	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:  a) Identifying and monitoring sources of waste and pollution.  b) Improving the efficiency and recycling potential of mill byproducts by converting them into value-added products.  - Major compliance -	FG Th mit Th and 1	V Kulai POMe Waste Matigate and common of mill operated Mater  Water  Land  waste and puragement in agement in a second mater in a second material	had identificanagement Aportrol the idesignificant erritors among of Sources from particulate) gases), and GHG Cleaning work (hydro-cyclowaste) & book Scheduled industrial/problem and Polannually. The shown below:	ed all wastes and source action Plan 2021 were entified wastes and sour entified wastes and sour entified wastes and sour entified wastes as summarized by Sources from boiler stack, vehicle & generator erobic processes (ETP, leavater/run-off/process sone /sterilizer condensation of the	ces of pollution. e established to rce of pollution. for the estates pelow;  (smoke and r (smoke and EFB dumping)- estation waters pate/clarification and blow down waste and ted in the Waste Financial Year	Complied
			Type o waste	f	Details		



Criterio	n / Indicator			A	Assessi	ment Fin	dings		Compliance
4.5.3.3	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005  - Major compliance -	I 2 3 FGV of h i. ii.	waste Sewage pollution Type Black sn Odor & Leakage / Kulai PO nandling c Manual L - Prosec Manual S - Prosec	led S hric ru ic ru ial Fi e Si n identified e of waste moke gases e of lubrica of chemica adang Sar dure Kerja dur Kerja dur memb	Spent nydraulio rubbish employe Fiber, pa Sewage ed from e  B A cant S ctablishe rals is avait Lesi a Selam fility Selama bancuh is dispos	IPA, hex c oil, greas from the ees' quarter alm kernel s from hous the mill op emission soilers/vehicativities from the stari mat Racun di F	cane, filter, se, used batter mill/estate of se, used batter mill/estate of se, used batter se, used batter se, used batter se, used betails of the effluence of the following series of the following	complex and sh, scrap iron inplex sivities:  from int treatment enance dling. The SOP	Complied
		l	7/7/20	0.569		0.284	0.032	0.010	



Criterio	on / Indicator			A	ssessme	Compliance			
		08/	/2/21 /9/21 /9/21	0.374 0.562 0.588	0.	.188 .051 .080	0.158 0.061 0.090		
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.  - Minor compliance -	proce chem <i>Penge</i> <i>Manu</i>	pesticide edures licals is endalian lal Open leeds to						
Criterio	n 4.5.4: Reduction of pollution and emission								
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.  - Major compliance -	Enviro be ev mana Enviro identi Pollut	onment valuated gement onment ified an tion Pre waste g	al Aspect I for the ir t plan. al Impact d docume evention P	& Impact npact and The eva t Evaluat ented in lan Finan	Identifidiany implication Identification Identifica	ication. From pact will be is docun waste an ste Manage ar 2021 rev	mented in the mented in the EAI, it will included in the mented in the depollution are ement Plan and iewed annually.	·
		1 S	Type of Schedul waste Domest waste Industri waste	ic	hydraulic rubbish f employee	oil, gre rom the es' quar	ase, used be mill/estate ters	r, lubricants, atteries complex and iler ash, scrap	



Criterio	n / Indicator		As	ssessment Findings		Compliance
		The 1 2 3 The Incifield emi	Sewage  pollution identified  Type of waste Black smoke  Odor & gases Leakage of lubrica  e mill also monitore lusive in the report d emission and sink ission and credits (t	from It treatment hance  Palm GHG. on data from sion from mill	-	
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented.  - Major compliance -	1 2	Environmental Issues Boiler- Black smok  Effluent- Odor & gases	Management/Action Plan  To monitor the condition of dust cyclone every 3 months To carry out boiler furnace cleaning every week  To maintain proper feeding into digestion process of effluent to prevent severe and unpleasant odour	Time frame AMM	Complied



Criterio	n / Indicator			Asse	ssment Fin	dings		Compliance
		3	Vehicles/Lorrie Leakage of lubricant/diese		Ensure r schedule to followed To place all drum on mel Vehicles aw into the r switched off	lubricant oil tal trays. aiting entry mill to be	АММ	
		4	Domestic wast odor and environmental pollution	e –	Only organic disposed. N and NIL d empty containers in	waste to be NO burning disposal of chemicals	АММ	
		abo ide	efforts and actio ove at current is ntified issues ha	adequ ve sign	ate to comply ificant impact	y with the rec s to the enviro	quirement. All onment.	
4.5.4.3	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.  - Major compliance -	the tha pro a)	Complied					
			Sample date PH BOD COD	Std 59. 20	6/10/20 8.60 24 285	28/11/20 8.40 57 378	18/12/20 8.40 26 198	



Criterio	on / Indicator			Asses	sment Fin	dings		Compliance
Criterio	n 4.5.5: Natural water resources	b) c) d)	2 Scheduled 3 Aeration N	f which rom fin it excep appeal DOE Jo lise. interim among n of mel effluen	is BOD less that discharge of for the BO letter dated whor. Outcome has made the others as stated as a Projects/ In mbrane filter toond deslude.	han 20 mg/l. were comp DD of which d 06/7/2020 e of discussion e following in ated below. itiative - ETP RM1M dging RM2001	pliance within the mill had , 15/09/2020 on and appeal itiative for the 2022.	
4.5.5.1	The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:  a) Assessment of water usage and sources.	revi	e mill water milewed in Jan 202 rain water harve water from the continual trainir	Complied				



Criterion / Indicator			Assess	sment Fin	dings	Compliance
b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.		silting of pacity.	water rese	rvoir to re	tain the reservoir optimal	
c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application,		Source	Activity	Threat	Action Plan	
maintenance of equipment to reduce leakage, collection of rainwater, etc.).  - Major compliance -	1	oir/ pond/	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer zone as non-spraying activities.	
	2	SAJ/ Rain	General Upkeep	Pollution Draught Wastage	Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.	
	3		Line site	Pollution Draught Wastage	Every house is supplied with containers.  To schedule water supply to avoid wastage.  Awareness on water usage efficiency.  Outsource from neighboring estates.	
	4			Water pollution	Prohibit workers from activities at water source Drinking water analysis.	

…making excellence a habit.<sup>™</sup>



Criterio	Criterion / Indicator				Asses	sment Fin	dings	Compliance
							Monitor condition of septic tank Adhere SW management procedure to avoid pollution caused by SW.	
4.5.5.2	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.	meth	ne mill at current had no plan to phase out the existing discharge ethod. However, the following initiatives are planned by the anagement for the BOD reduction.				Complied	
	- Major compliance -	Projects/ Initiative  1 Installation of membrane filter - ETP RM1M 2022.  2 Scheduled effluent pond desludging RM200K  3 Aeration Modification 2021  4 On-line desludging system RM100K				ETP RM1M 2022. jing RM200K		
4.6 Prin	ciple 6: Best Practices							
Criterio	n 4.6.1: Mill Management							
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  - Major compliance -	i. T ii. M iii. T iv. P	ime The Vill The Pros	ents amor Mill Lesta Standard Mill Qual sedur Kerj	ng others; ari Processi Operating	ng Manual Procedure, ment Manua	imented in the following	Complied

...making excellence a habit."



Criterio	n / Indicator			Assessment Findings	Compliance
		ope deta i. ii. iii.	rations. The ails from; the reception clarification, effluent, laborated addition, there	s provide guidelines and standards in the mill Standard Operating procedure (SOP) described n, sterilization, threshing, pressing, depericarping (nut polishing) station, pratory, workshop, dispatches etc.	
		and			
4.6.1.2	All palm oil mills shall implement best practices.  - Major compliance -	The sup	Complied		
		The also ann SCC in re			
			Areas	Action/Activities	
		1		Supervision by staff/Assist/Manager Report of daily activities/costings/variation	
		2	Schedule	Quarterly ESH meeting	
				Internal audits by GCAD / SHO	
				External audit RSPO /MSPO Zone Head / Regional Controller visit.	
		3	Annual	Annual EPMC	
				Medical surveillance	

…making excellence a habit<sup>™</sup>



Criterio	Criterion / Indicator		Assessment Findings					
		review. There are field/mill supervisor Controller (RC) are towards the SOP,	The mill maintained all records of monitoring and available for review. There are several levels of records beginning from the field/mill supervisors to executives and the Managers. The Regional Controller (RC) are accountable to monitor the estates compliance towards the SOP, budget and productivity among others. Estates / Mill performances are reviewed during the monthly meeting with RC/ZH.					
Criterio	n 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 -	in the form of annu year, PY2, PY3, PY The business plar CPK. The Component of i. process labour ii. maintenance e iii. consumable, E iv. admin cost,	The Component of operating expenditure among others includes; i. process labour, ii. maintenance external, maintenance parts, iii. consumable, EVIT,					Complied
		Year	2021	2022	2023	2024	2025	
		FFB processed	X	X	X	X	X	
		OER KER	X	X	X	X	X	
		Administration	X	X	X	X	X	

…making excellence a habit.™



Criterio	Criterion / Indicator		Assessment Findings						
Cuitorior	<b>4.6.3:</b> Transparent and fair price dealing	Processing cost Depreciation H Q charges RM/mt FFB RM/mt CPO  Inclusive in the buamong others show i. replacement / ii. machinery, iii. workers' ameni The profit and loss Regional office/He	wing expoupgrading ities and stateme	enditure o g of buildi staff nt were m	ng/		,		
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented.  - Major compliance -	Current and previous daily price declared updated the daily I Fair pricing calcula 20%) awarded to the FFB Purchasing Formula.  Daily FFB prices will and updated dated 01/11/2021 month of October	d by MPC FFB price ted base suppliers g Agreem vere displ on daily - 08/1:	OB. The FF is to the modern don daily is including tents under ayed at the basis. Signature of the property of	B Purchas hill on daily price deck g smallholer section in the weighbighted the	sing Depa y basis. ared by N ders as s 2: Price ridge sta weekly	APOB (OER specified in Calculation at the FFB prices	Complied	

...making excellence a habit.™



Criterion / Indicator	Assessment Findings	Compliance
	As for contract work, the price determines by Mill Management, Regional Office Zonal Office or HQ base on value of the contract. All contracts are kept in Mill office. Sighted the Contract Agreement signed by Contractor and Mill.	
All contracts shall be fair, legal and transpayments shall be made in timely manner.  - Major compliance -	verification of contract agreement, records of payment and interview with contractors showed that contracts was fair, legal and transparent and agreed payments w e r e made in timely manner. Reviewed the contracts as follows:  1. "Surat Perintah Kerja" no. 3301514708/20958323 between FGV Kulai POM and Teknovasi Terbilang Sdn. Bhd. dated 06/10/2021  2. "Surat Perintah Kerja" no. 330151366/20958772 between FGV Kulai POM and H.K Ngan Engineering Sdn. Bhd. dated 09/10/2021  3. "Surat Perintah Kerja" no. 3301515537/20959047 between FGV Kulai POM and Kejuruteraan Letrik Tegap Maju dated 12/10/2021  4. Contract agreement between FGV and Bingan Jaya Sdn. Bhd. dated 28/09/2015.  Reviewed the payment records for FFB Suppliers as follows:  1. Md. Fadzir Mohd Lajim  Payment References no. Date  MYIG210929173300 29/09/2021  MYIG211006211472 06/10/2021  MYIG211013814156 13/10/2021  MYIG211027536431 27/10/2021  MYIG211103027015 03/11/2021  2. Eng Huat Latex Concentrate	Complied

…making excellence a habit.™



Criterio	n / Indicator		Assessment	Findings		Compliance
		3.	Payment References no.  MYIT210811746982  MYIT210818904570  MYIT210825858407  MYIT210902177389  MYIT210908343194  Bingan Jaya Sdn. Bhd.  Payment References no.  MYIT210902177384  MYIT210908343192  MYIT210915963712  MYIT210922941195  MYIT210929173299	Date 11/08/2021 18/08/2021 25/08/2021 02/09/2021 08/09/2021  Date 02/09/2021 08/09/2021 15/09/2021 22/09/2021 29/09/2021		
Criterior	4.6.4: Contractor					
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.  - Major compliance -	and the as: 1. 2. 3. 4. 5.	contractors and FFB suppliers we disign the Supplier Code of Conduct stated Supplier Code of Conduct stated Business ethics and integrity Safety, Health & Environment Labour Standards Communication and documental Sustainability Reporting obligation	duct, FGV Holdings Berl d the MSPO requiremen	had. In	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		Reviewed sampled contracts and Supplier Code of Conducts as follows:  1. "Surat Perintah Kerja" no. 3301514708/20958323 between FGV Kulai POM and Teknovasi Terbilang Sdn. Bhd. dated 06/10/2021  2. "Surat Perintah Kerja" no. 330151366/20958772 between FGV Kulai POM and H.K Ngan Engineering Sdn. Bhd. dated	
		<ul> <li>09/10/2021</li> <li>3. "Surat Perintah Kerja" no. 3301515537/20959047 between FGV Kulai POM and Kejuruteraan Letrik Tegap Maju dated 12/10/2021</li> <li>4. Contract agreement between FGV and Bingan Jaya Sdn. Bhd</li> </ul>	
		dated 28/09/2015.  5. "Surat Perintah Kerja" no. 820105001-2020/820230501-12-132 between FGV Agri Services Sdn. Bhd (Stesen FGVAS Taib Andak) and Ahmad b. Hashim dated 09/12/2020.	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor.  - Major compliance -	Reviewed sampled contracts and Supplier Code of Conducts includes agreement signed by the contractors and Mill manager with term and condition which includes contractor must adhere to FGV policies and MSPO compliances.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.  - Minor compliance -	As stated in the Supplier Code of Conducts under section 4. Communication and documentation subsection 4.3. Inspection and section 5. Sustainability subsection 5.2 Adherence to Sustainability Policy.	Complied



#### **Appendix B: List of Stakeholders Contacted**

<b>Government Officer:</b> SK Sinar Bahagia	Community/neighbouring village:
Suppliers/Contractors/Vendors:	Worker's Representative/Gender Committee:
Felda Taib Andak	Female workers
FFB Transporter and Sorters	Foreign Workers
	Workers' Representatives



#### **Appendix C: Smallholder Member Details**

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

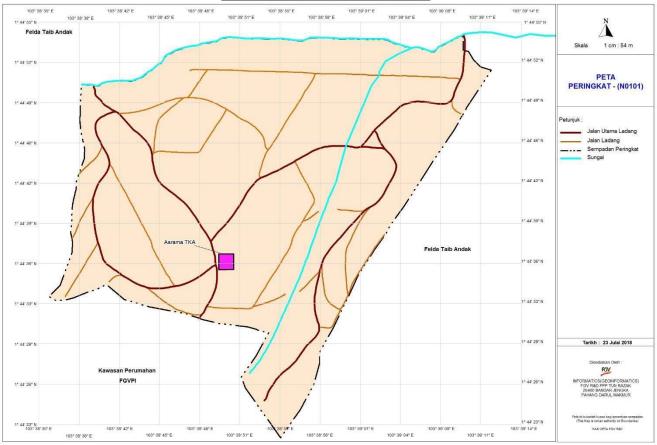


#### **Appendix D: Location and Field Map**





#### LADANG PENYELIDIKAN FASSB TAIB ANDAK





#### **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