

**MALAYSIAN SUSTAINABLE PALM OIL
MSPO OPMC Public Summary Report**

- Initial Assessment
- Annual Surveillance Assessment (3)
- Recertification Assessment (Choose an item.)
- Extension of Scope

FGV HOLDINGS BERHAD
Client Company (HQ) Address: Level 20 West, Wisma FGV Jalan Raja Laut, 50350 Kuala Lumpur, Malaysia
Certification Unit: FGV Palm Industries Sdn Bhd - Keratong 3 Palm Oil Mill & FGV Plantations (Malaysia) Sdn Bhd - Keratong 11 Estate
Date of Final Report: 29/4/2022

Report prepared by:
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Report Number: 3293242

Assessment Conducted by:
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TABLE of CONTENTS	Page No
Section 1: Executive Summary	3
1.1 Organizational Information and Contact Person	3
1.2 Certification Information	3
1.3 Other Certifications	4
1.4 Location of Certification Unit	4
1.5 Certified Area	4
1.6 Plantings & Cycle	4
1.7 Certified Tonnage of FFB	4
1.8 Uncertified Tonnage of FFB.....	5
1.9 Certified Tonnage	5
1.10 Actual Sold Volume (CPO).....	5
1.11 Actual Sold Volume (PK).....	5
Section 2: Assessment Process	6
2.1 BSI Assessment Team	7
2.2 Impartiality and conflict of interest	8
2.3 Accompanying Persons	8
2.4 Assessment Plan	8
Section 3: Assessment Findings	10
3.1 Details of audit results.....	10
3.2 Details of Nonconformities and Opportunity for improvement	10
3.3 Status of Nonconformities Previously Identified and OFI	11
3.4 Summary of the Nonconformities and Status	17
3.5 Issues Raised by Stakeholders	18
Section 4: Assessment Conclusion and Recommendation	20
Appendix A: Summary of the findings by Principles and Criteria.....	21
Appendix B: Smallholder Member Details.....	114
Appendix C: Location and Field Map.....	115
Appendix E: FGV Keratong 11 Field Map.....	116
Appendix D: List of Abbreviations	117

Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	FGV Holdings Berhad		
Mill/Estate	Certification Unit	MPOB License No.	Expiry Date
	Keratong 3 POM	500194604000	31/03/2022
	Keratong 11 Estate	558962002000	28/02/2022
Address	Kilang Sawit Keratong 3, 26900 Muadzam Shah, Pahang, Malaysia		
Management Representative	Ameer Izyanif bin Hamzah		
Website	https://www.fgvholdings.com	E-mail	ameer.h@fgvholdings.com
Telephone	03-27890497	Facsimile	03-27890440
1.2 Certification Information			
Certificate Number	Mill: MSPO 693214 Estates: MSPO 693216	Certificate Start Date	06/12/2018
Date of First Certification	06/12/2018	Certificate Expiry Date	05/12/2023
Scope of Certification	<input checked="" type="checkbox"/> Mills: Production of Sustainable Palm Oil and Palm Oil Products <input checked="" type="checkbox"/> Estates: Production of Sustainable Oil Palm Fruits		
Visit Objectives	To conduct a surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organisation's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.		
Standard	<input type="checkbox"/> MSPO MS 2530-2:2013 – General Principles for Independent Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		
Stage 1 Date	22/05/2018		
Stage 2 / Initial Assessment Visit Date (IAV)	20-21/09/2018		
Continuous Assessment Visit Date (CAV) 1	03-04/12/2019		
Continuous Assessment Visit Date (CAV) 2	03-04/12/2020		
Continuous Assessment Visit Date (CAV) 3	02-03/12/2021		
Continuous Assessment Visit Date (CAV) 4	-		

MSPO Public Summary Report

Revision 2 (Nov 2021)

1.3 Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 693213	RSPO Principles & Criteria for Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019	BSI Services Malaysia Sdn Bhd	24/03/2024

1.4 Location of Certification Unit			
Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Keratong 3 POM	Kilang Sawit Keratong 3, 26900 Muadzam Shah, Pahang, Malaysia	2° 55' 41.2" N	102° 56' 02.9" E
Keratong 11 Estate	Gugusan Felda Keratong, Ladang FGVM Keratong 11, 26700 Muadzam Shah, Pahang	2° 53' 08.2" N	103° 01' 06.6" E

1.5 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Keratong 11	984.24	0	212.16	1,196.40	82.27
Total (ha)	984.24	0	212.16	1,196.40	

1.6 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Keratong 11	378.46	130.99	129.50	345.29	-	605.78	378.46
Total (ha)	378.46	130.99	129.50	345.29	-	605.78	378.46

1.7 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Dec 2020 - Nov 2021)	Actual (Dec 2020 - Oct 2021)	Forecast (Dec 2021 - Nov 2022)
Keratong 11	9,707.00	6,792.23	10,350.00
Total (mt)	9,707.00	6,792.23	10,350.00

MSPO Public Summary Report
Revision 2 (Nov 2021)

1.8 Uncertified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Dec 2020 - Nov 2021)	Actual (Dec 2020 - Oct 2021)	Forecast (Dec 2021 - Nov 2022)
FELDA & FTP	180,000.00	122,001.50	174,650.00
Private Supplier	60,000.00	47,942.81	60,000.00
Total (mt)	240,000.00	169,944.31	234,650.00

1.9 Certified Tonnage			
Mill Capacity: 40 MT/hr SCC Model: MB	Estimated (Dec 2020 - Nov 2021)	Actual (Dec 2020 - Oct 2021)	Forecast (Dec 2021 - Nov 2022)
	FFB	FFB	FFB
	9,707.00	6,792.23	10350.00
	CPO (OER:21 %)	CPO (OER: 22.31%)	CPO (OER: 21.00%)
	2038.47	1515.34	2173.50
	PK (KER: 5.20%)	PK (KER: 5.95%)	PK (KER: 5.30%)
	504.76	404.14	548.55

1.10 Actual Sold Volume (CPO)					
CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
1515.34	-	-	-	1515.34	1515.34

1.11 Actual Sold Volume (PK)					
PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
404.14	-	-	-	404.14	404.14

Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 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 02-03/12/2021. The audit programme is included as Section 2.4. The approach to the audit was to treat the Keratong 3 POM and Keratong 11 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 and MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The Certification Unit not using MSPO certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSPO Logo and related claims.

The estates or smallholders sample were determined based on formula $S = r\sqrt{n}$ where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula $(r\sqrt{n})$; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix B.

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 Section 3.6.

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.

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

This report was externally reviewed by MSPO approved Peer Reviewer prior to certification and recertification decision by BSI. For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

MSPO Public Summary Report Revision 2 (Nov 2021)

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

Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Keratong 3 POM	√	√	√	√	√
Keratong 11 Estate	√	√	√	√	√

Tentative Date of Next Visit: November 1, 2022 - November 2, 2022

Total No. of Mandays: 4

2.1 BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Muhamad Naqiuddin Mazeli (MNM)	Team Leader	<p>Education: Holds a Bachelor Science Horticulture from University Putra Malaysia.</p> <p>Work Experience: 11 years working experience in oil palm industry managing sustainability implementation and certification of RSPO P&C, ISCC, and ISO 9001 and ISO 18001 for the estates, mills, refineries and Smallholder scheme. He also supports in providing training related to RSPO and other certifications where applicable to the operations during previous company.</p> <p>Training attended: Completed ISO 9001:2015 LA Training(2019), ISO 14001:2015 LA Training (2018), ISO 45001:2018 LA Training (2018), HCV & HCS Training (2019), Endorsed RSPO P&C LA Training(2018), Endorsed RSPO SCCS LA (2018), SCCS Refresher Training (2019), MSPO LA Training (2018), SMETA Training (2021).</p> <p>Aspect covered in this audit: During this assessment, he covers Social aspect and stakeholder consultation.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p>
Amir Bahari (ABA)	Team Member	<p>Education: He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996.</p> <p>Work Experience: He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates.</p> <p>Training attended: 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.</p>

MSP0 Public Summary Report
Revision 2 (Nov 2021)

		<p>Aspect covered in this audit: During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p>
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2.2 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

2.3 Accompanying Persons

No.	Name	Role
	NA	

2.4 Assessment Plan

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

Date	Time	Subjects	MNM	ABA
Sunday, 28/11/2021		Travelling to Segamat	√	√
Monday, 29/11/2021	0800 - 0830 0830 - 0900	<p>Opening Meeting MSP0:</p> <ul style="list-style-type: none"> Opening Presentation by Audit team leader with RSPO Team Confirmation of assessment scope and finalize Audit plan 	√	√
Thursday, 2/12/2021	0830 - 1230	Keratong 3 POM Inspection: FFB receiving, warehouse, workshop, waste management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√
	1000 - 1100	Stakeholder Interview	√	
	1230 - 1330	Lunch	√	√
	1330 - 1600	Document review (MS:2530 Part 4), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices	√	√
	1600 - 1700	Interim Closing briefing	√	√

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Date	Time	Subjects	MNM	ABA
Friday, 3/12/2021	0830 - 1230	Keratong 11 Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√
	1000 - 1100	Stakeholder Interview		√
	1230 - 1330	Lunch	√	√
	1330 - 1600	Document review (MS:2530 Part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices, P7: Development of New Planting	√	√
	1600 - 1630	Interim Closing briefing	√	√
		Finalization of audit findings & preparation of closing meeting	√	√
	1630 - 1700	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. The findings summary of the assessment by criteria are listed in Appendix A.

During the Annual Surveillance Assessment 3 there were no Major & one (1) Minor nonconformities raised. The Keratong 3 POM and Keratong 11 Estate certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The below is the summary of the non-conformity raised during this assessment.

Non-Conformity Report			
NCR Ref #:	2140066-202111-N1	Issue Date:	3/12/2021
Due Date:	Next Surveillance	Date of Closure:	Open
Area/Process:	Keratong 3 POM	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.5.3.2 Minor
Requirements:	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by- products		
Statement of Nonconformity:	The implementation of waste material storage is ineffectively demonstrated.		
Objective Evidence:	Keratong 3 POM - During the site visit to the mill compound / processing plant it was observed that presence of residual materials, scrap materials and maintenance parts were evident without proper storage and segregation.		
Corrections:	1. Appoint contractor to transfer the shredded fiber from scrap materials storage area and shell bay area 2. Perform cleaning work to segregate all the residual materials, scrap materials and maintenance part to the designated area 3. Build or make proper signage		

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Root cause analysis:	<ol style="list-style-type: none"> 1. Not enough space for proper storage and segregation due to the high stock of shredded fiber. 2. No signage of designated area for storage material part and scrap materials.
Corrective Actions:	<ol style="list-style-type: none"> 1. Contact with by product department HQ to find new buyer or increase the pickup of shredded fiber from existing buyer to reduce the current stock and overproduction.
Assessment Conclusion:	The correction and corrective action are accepted. The effectiveness of the implementation will be verified during next assessment

Opportunity for Improvement			
Ref:	Nil	Clause:	MSP0 Part __:
Area/Process:			
Objective Evidence:			

Noteworthy Positive Comments	
1	Good documentation upkeep and retrieval
2	Good cooperation by management team/staff/sustainability team

3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
NCR Ref #:	1993322-202011-M1	Issue Date:	04/12/2020
Due Date:	04/03/2021	Date of Closure:	26/02/2021
Area/Process:	Keratong 11 Estate	Clause & Category: (Major / Minor)	MSP0 2530 Part 3: 4.6.1.1 Major
Requirements:	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.		
Statement of Nonconformity:	Implementation of the Standard Operating Procedure was inconsistent.		
Objective Evidence:	<ol style="list-style-type: none"> 1. As per the Penyerahan & Pengimpanan Passport TKA semasa dalam Perkhidmatan (Doc. No.: FGV/FGVPM-JTK/OP/021, Rev. 0 dated 01/09/2019, Clause 6.5.6, the person responsible has to conduct inspection on the passport that kept in the locker provided by the company on monthly basis and record of inspection must be documented. However, there was no record of inspection was carried out in Keratong 11 Estate. 2. The contractor appointed by the Keratong 11 Estate’s management to transport FFB from ramp to mill has signed the agreement (Contract No.: 5300002395). The contractor has appointed sub-contractor to be the lorry driver. However, there was no written consent between the contractor and FGVPMMSB sighted. This has not complied with Terma dan Syarat bagi Pesanan Belian (PB)/ Perintah 		

MSPO Public Summary Report
Revision 2 (Nov 2021)

	<p>Kerja (PK) 1/2013, Clause 12 – Tugas dan Perlantikan Sub-kontraktor and Document Contract, Clause 13 – Assignment of Sub-Contracting.</p> <p>3. Reviewed of the pay slips and Kad Kerja in Keratong 11 Estate found that the workers did not receive RM 1,200 as per company’s guidance (Ref. No.: (01)HREO/WW/01/1/2020) dated 05/02/2020 issued by Human Resource Department (Plantations) in FGV Holdings.</p>
<p>Corrections:</p>	<ol style="list-style-type: none"> 1. Implement the monitoring record of employee passport storage boxes every month by the Foreign Worker Affairs Officer (HEP). 2. Estate management especially HEP officers are trained and have good knowledge related to SOP management of foreign workers. 3. Regional JTK officers conduct periodic SOP compliance inspections as an enforcement mechanism to estate management. 4. Provide joint agreement documents between FGVP management and main contractors for the appointment of sub-contractors. 5. Letter of notification of application for appointment requirements of subcontractors from the main contractor for the consideration of the FGVP Procurement Department. 6. Letter of information on the results of the application for the appointment of a subcontractor agreed by the FGVP Procurement Department of the province with the conditions to be complied with. 7. Procurement department issues a letter of notification to all contractors to comply with the terms in the work contract, among them need to inform and obtain the consent of any sub-contractor appointment. 8. Procurement department provides clear information to projects related to contractor requirements to comply with the terms of the Terms and Conditions for Purchase / Work Order] 1/2013, Clause 12 - Assignment and Appointment of Subcontractors [Duties and Appointment of Sub-contractors] and Contract Documents, Clause 13 - Submission of Sub-Contract to be complied with. 9. Provide a record format for monitoring employees who do not reach the minimum wage every month reviewed by estate management and action every month. 10. A reminder letter is given to the staff supervising the employment of employees so that monitoring of employee employment is done every week. 11. Conduct investigations by JTK regional officer for employees who do not achieve the minimum wage whether the problem of low productivity is due to poor monitoring of officers or employees' failure to comply with the prescribed work discipline. 12. Consultation discussions and mutual agreement are implemented to the group of employees who do not reach the minimum wage monitored every month of development. 13. Provide regular training related to the minimum wage payment method to all employees as it improves the understanding of salary calculation and productivity methods.
<p>Root cause analysis:</p>	<p>SOPs are not implemented consistently by project management as there is no enforcement monitoring mechanism and corrective action is implemented immediately to ensure SOPs are complied with by the responsible staff.</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

<p>Corrective Actions:</p>	<ol style="list-style-type: none"> 1. There is a SOP enforcement monitoring mechanism for estate management from the regional procurement department and regional Labour Department (JTK) officers who are implemented regularly through internal audits and project visits. 2. Officers in charge at the estate management level and contractors are given continuous SOP information and training to enhance good understanding. 3. Estate management monitors the employment of workers on a weekly basis so that immediate corrections can be implemented for workers with low productivity and not achieving a minimum wage. 4. Estate management conducts ongoing discussions with foreign workers to improve the discipline and understanding of workers to achieve the set minimum wage.
<p>Assessment Conclusion:</p>	<p>During verification of evidence, Regional Controller of Wilayah Muadzam has issued a letter (Bil: (6)JTK/WMD/1 dated 08/02/2021 to inform the estates' management to implement the monitoring of passport locker as per the SOP. All the estates' management is required to submit the monitoring report to the JTK Officer in the region before 7th of the month started on March 2021. Besides, a seminar and training on the management of passport locker was conducted on 08/02/2021 by Senior Manager of JTK Southern Zone with all the estates in the region included Keratong 11 Estate. Training records such as minutes and attendance list were sighted. Passport locker inspection form was established, and Keratong 11 Estate has carried out the inspection on 18/01/2021 with the status of the passport was remarked in the form. The inspection was carried out by the manager.</p> <p>The contractor has made application to the management for appoint a sub-contractor for carry out duty in the estate. Seen the letter of application dated 26/12/2020. The Regional Controller has approved the application and sent a letter of notification (Bil: (30) Persuratan Am) dated 31/12/2020 to the contractor. Terms and conditions for the sub-contractor to be complied with were clearly stated in the letter of notification. The contractor has signed an agreement with the sub-contractor to ensure the subcontractor is complied with the terms and conditions. Procurement department has issued a letter of notification to all contractors to comply with the terms in the work contract dated 18/01/2021. The procurement department has provided clear information to mill and estates to obtain approval prior the appointment of subcontractors from Regional Controller. The email has been circulated on 23/02/2021.</p> <p>An inspection to Keratong 11 Estate was conducted on 05/02/2021 by Manager of JTK FGVP to investigate the workers who do not achieved minimum wages. From the report of investigation found that the workers who did not achieved minimum wages were due to discipline issues. Reminder letters were issued to the respective workers for not absenteeism and not attended roll call were sighted. A reminder letter dated 30/12/2020 (Bil: (17)483/06-01-06 (ARAHAN PENGURUS)) was issued to the supervisors in the estate to ensure monitoring of the workers' wages to achieve minimum wage. Workers' Welfare meeting was conducted on 24/12/2020 to explain the minimum wage and the reason of the workers who did not achieve minimum wage.</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

	Besides, monitoring of the wages through eRML system by the respective person in charge. The implementation of corrective actions was found effective and thus, major nonconformance was closed on 26/02/2021.
Verification Statement:	From the verification, a letter (Bil: (6)JTK/WMD/1 dated 08/02/2021 to inform the estates' management to implement the monitoring of passport locker as per the SOP. All the estates' management is required to submit the monitoring report to the JTK Officer in the region before 7th of the month started on March 2021. The inspection record by manager in each sampling estate was available and verified. No reoccurrence issue has been verified, thus Major NC remained closed.

Non-Conformity Report			
NCR Ref #:	1993322-202011-M2	Issue Date:	04/12/2020
Due Date:	04/03/2021	Date of Closure:	26/02/2021
Area/Process:	Keratong 3 POM	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.3.1.1 Major
Requirements:	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.		
Statement of Nonconformity:	Compliance to the legal requirement was not demonstrated effectively.		
Objective Evidence:	Based on the "Jadual Permatuhan Pengurusan Buangan Pepejal Kelapa Sawit, Para No. 22 – "Lokasi pengumpulan tandan kosong (EFB) hendaklah ditempatkan sepertimana yang ditunjukkan di dalam pelan lokasi penstoran EFB pada Lampiran B1. Lokasi ini hendaklah berada sekurang – kurangnya 100m dari alurair terdekat". However, during the POM visit by the auditor, it was found that there is another area used by the POM's management to place EFB adjacent to cooling pond area. This noncompliance practice was confirmed by the POM Executive during the site visit to EFB area. This has not complied with Jadual Permatuhan, No. Lesen 005103 issued by Department of Environment, Pahang State– JP/KKS/2020/2021/005103.		
Corrections:	<ol style="list-style-type: none"> 1. Issue reminder letters to responsible staff to ensure legal compliance is taken seriously immediately and involves KPI performance appraisals being assessed. 2. POM management prepares EFB management action plans for short term, long term and emergency are available. 3. Perform cleaning work and transfer of EFB waste piles to designated drainage areas refer to EFB storage location plan Compliance schedule. 4. Appoint a work contract to send the excess EFB to the farm as a cover to reduce the EFB relief placed in unauthorized areas. 		
Root cause analysis:	No firm follow-up action was taken by the POM management to enforce the existing legal compliance mechanism implemented by the responsible officer.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Existing legal compliance mechanisms such as from internal audit reports, work area checklists are taken into account by updating daily actions during the morning meeting on legal compliance issues. 2. Strict action is taken by the POM management by taking action against the Head of the responsible staff who failed to comply with the legal requirements subject to a reminder letter action that will affect the evaluation of KPI performance. 		

MSPO Public Summary Report
Revision 2 (Nov 2021)

Assessment Conclusion:	<p>During verification of evidence,</p> <p>The management has developed management plan for EFB 2021 with short term and long-term plan identified. Emergency management plan was identified as well in case of any emergency happened. Reminder letter dated 28/12/2020 (Bil: (02)4028/Ktg 3/840A/RSPO/MSPO) was issued to responsible staff to ensure legal compliance is taken seriously immediately and involves KPI performance appraisals being assessed.</p> <p>Existing legal compliance mechanisms such as from internal audit reports, work area checklists are taken into account by updating daily actions during the morning meeting on legal compliance issues. Standing meeting on daily basis was conducted to update if there are any issues related to legal compliance. Seen the record of standing meeting conducted on 12/01/2021. Photo evident of the clearance of EFB beside the sludge pit was sighted. The EFB was disposed by contractor and seen the Surat Perintah Kerja with No. SPK: 3301472074 dated 31/12/2020 sighted. Monitoring checklist of compliance of compliance schedule of DOE was developed and implemented. The last monitoring was conducted on 18/01/2021.</p> <p>The implementation of corrective actions was found effective and thus, major nonconformance was closed on 26/02/2021.</p>
Verification Statement:	<p>During site verification and document review, the EFB was in EFB parking area. The record show that EFB was disposed at estate as EFB application for giving back nutrient to the soil. Not sighted any EFB in others area thus Major NC remain closed.</p>

Non-Conformity Report			
NCR Ref #:	1993322-202011-N1	Issue Date:	04/12/2020
Due Date:	Next Surveillance Audit	Date of Closure:	03/12/2021
Area/Process:	Keratong 11 Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.1.1 Minor
Requirements:	Social impact should be identified, and plans are implemented to mitigate the negative impacts and promote the positive ones.		
Statement of Nonconformity:	The social management plan has not completed comprehensively.		
Objective Evidence:	<p>Some of the impacts' changes in Keratong 11 Estate were not identified in the management plan:</p> <ol style="list-style-type: none"> 1. Delaying in the MyEG service provider on payment which caused the FOMEMA result of workers expired. 2. Deduction of water was made since October 2019 for total RM 10 after the Regional Control Unit's visit on 07/10/2019. 3. Monitoring of the recruitment fee by the sub-agent in source of country. 		
Corrections:	<ol style="list-style-type: none"> 1. Conduct SIA evaluation for review with the involvement of all stakeholders involved and changes in the impact on stakeholders are assessed. 2. Provide the latest SIA procedures that have been approved by management to be implemented. 3. Provide training on SIA assessment procedures to responsible staff to improve skills to identify the impact of SIA on projects. 		

MSPO Public Summary Report
Revision 2 (Nov 2021)

	4. Submit a social impact assessment (SIA) report using the latest SIA procedure format.
Root cause analysis:	The revision of the existing SIA plan review could not be carried out by the estate management due to lack of skills in conducting a comprehensive social impact assessment and the latest SOP is still in the process of reviewing management approval.
Corrective Actions:	Responsible officers at the estate level can implement and identify new impact changes to provide a more complete management action mitigation plan.
Assessment Conclusion:	The CAP is accepted, and the implementation of the CAP will be verified during next assessment.
Verification Statement:	From the verification on SIA management plan dated June 2021 the management already included the issue been raised by the workers. The issue regarding to MyEG and wages deduction for water and also the issue pertaining to recruitment issue already been taken up by management with management plan was available and no reoccurrence issue during audit thus minor NC been close.

Non-Conformity Report			
NCR Ref #:	1993322-202011-N2	Issue Date:	04/12/2020
Due Date:	Next Surveillance Audit	Date of Closure:	03/12/2021
Area/Process:	Keratong 3 POM	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.5.3.2 Minor
Requirements:	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products		
Statement of Nonconformity:	The waste management plan for scheduled waste and non-scheduled waste item was not implemented and monitored effectively.		
Objective Evidence:	During the site visit to the staff housing complex at Block H and Class F14, the auditors found the following non-compliances: 1. Disposal of domestic waste using fire was seen at the residential area. 2. Empty lubricant containers, empty chemical container, empty paint container, empty mineral water bottle and spillage of engine oil was seen at the residential area.		
Corrections:	1. Issue a reminder letter to staff who fail to comply with the level of cleanliness and waste management practices set by management. 2. Prepare the schedule of the gotong royong program every month with the involvement of the entire staff housing staff in continuously improving cleanliness.		
Root cause analysis:	The management of domestic waste and scheduled waste in staff housing areas is less effective because the waste management is managed by employees and families who do not get information and continuing education for awareness of the need to manage the waste more responsibly. There are employees who deliberately		

MSPO Public Summary Report
Revision 2 (Nov 2021)

	do not comply with the instructions of the POM management for the ban on open burning because no serious and firm action will be taken will be imposed.
Corrective Actions:	<ol style="list-style-type: none"> 1. Conduct campaigns and provide education on domestic waste management and scheduled waste by all family members living in staff housing. 2. Install several warning signs of Open Burning Prohibition and Scheduled Waste Disposal in the staff housing area provided.
Assessment Conclusion:	The CAP is accepted, and the implementation of the CAP will be verified during next assessment.
Verification Statement:	During site visit at housing area for workers, the domestic waste been disposed twice a week by contractor and according to SOP of mill and no open burning trace as per site verification. From the monitoring also not sighted any SW in workers housing, the warning signage also available at workers housing area thus minor NC was close.

Opportunity For Improvement																																							
Ref:	1993322-202011-I1	Clause:	MSPO 2530 Part 3: 4.5.1.2																																				
Area/Process:	Keratong 11 Estate																																						
Objective Evidence:	Existing of "Pengenalpastian Aspek dan Penilaian Impek" for Keratong 11 Estate is acceptable and well maintained nevertheless the Estate management should improve and regularly review the aspect and impact activities for each station/ area.																																						
Verification Statement:	<p>The aspect and impact analysis for all the estate operations are documented on Aug 2017 and revised annually latest being on 03/8/21. In the comprehensive report, the study of aspect and impact are aimed to:</p> <ol style="list-style-type: none"> i. Plan to avoid negative impact and to promote positive impacts. ii. Reduction disposal of waste taking into consideration of social responsibilities. iii. Plan to reduce pollution and release of GHG iv. Development and implementations. <p>Aspect and impact covered the following activities/operations among others:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2" style="text-align: center;">Activities</th> <th colspan="2" style="text-align: center;">Activities</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Poisoning of VOPs/ woodies</td> <td style="text-align: center;">9</td> <td>Grass slashing</td> </tr> <tr> <td style="text-align: center;">2</td> <td>Circle spraying</td> <td style="text-align: center;">10</td> <td>Fertiliser application</td> </tr> <tr> <td style="text-align: center;">3</td> <td>Management of empty containers</td> <td style="text-align: center;">11</td> <td>Grading of FFB</td> </tr> <tr> <td style="text-align: center;">4</td> <td>Rat baiting</td> <td style="text-align: center;">12</td> <td>Vehicle maintenance</td> </tr> <tr> <td style="text-align: center;">5</td> <td>Triple rinsing</td> <td style="text-align: center;">13</td> <td>Chemical storage</td> </tr> <tr> <td style="text-align: center;">6</td> <td>Drainage construction</td> <td style="text-align: center;">14</td> <td>P & D census</td> </tr> <tr> <td style="text-align: center;">7</td> <td>Rat Baiting</td> <td style="text-align: center;">15</td> <td>Boundary maintenance</td> </tr> <tr> <td style="text-align: center;">8</td> <td>Road maintenance</td> <td style="text-align: center;">16</td> <td>Landfill management</td> </tr> </tbody> </table>			Activities		Activities		1	Poisoning of VOPs/ woodies	9	Grass slashing	2	Circle spraying	10	Fertiliser application	3	Management of empty containers	11	Grading of FFB	4	Rat baiting	12	Vehicle maintenance	5	Triple rinsing	13	Chemical storage	6	Drainage construction	14	P & D census	7	Rat Baiting	15	Boundary maintenance	8	Road maintenance	16	Landfill management
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3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
1682567-201804-M1	Major	21/09/2018	Closed on 20/12/2018
1682567-201804-M2	Major	21/09/2018	Closed on 20/12/2018

MSPO Public Summary Report
Revision 2 (Nov 2021)

1682567-201804-N1	Minor	21/09/2018	Closed on 03/12/2019
1859638-201911-M1	Major	03/12/2019	Closed on 02/02/2020
1859638-201911-N1	Minor	03/12/2019	Closed on 04/12/2020
1993322-202011-M1	Major	04/12/2020	Closed on 26/02/2021
1993322-202011-M2	Major	04/12/2020	Closed on 26/02/2021
1993322-202011-N1	Minor	04/12/2020	Closed on 3/12/2021
1993322-202011-N2	Minor	04/12/2020	Closed on 3/12/2021
2140066-202111-N1	Minor	03/12/2021	"Open"

3.5 Issues Raised by Stakeholders

Stakeholders comment	
1	<p>Feedbacks: Female Workers – They informed that they were treated equally without discrimination of gender. They were briefed on the new mother needs implemented by the company. However, there was no new mothers in all the operating units. They informed that there was no sexual harassment or violence case reported.</p> <p>Management Responses: The management will continue to respect the rights of female workers.</p> <p>Audit Team Findings: No other issue.</p>
2	<p>Feedbacks: Workers’ Representatives – They informed that they were elected by the workers to be the representatives of workers. Meeting was conducted with the management to discuss if there is any issue with the workers. Actions have been taken by management and kept them informed on the status of issue reported. There was no issue raise by the workers during the time of audit.</p> <p>Management Responses: The management will act accordingly if there is any complaint reported.</p> <p>Audit Team Findings: No other issue.</p>
3	<p>Feedbacks: Contractors – They informed that no payment issue with FGV as they paid as per agreed term. They have signed agreement prior to provide service to FGV. One of the contractors informed that some workers needed the overtime work however the shift already far more enough to give the OT to workers.</p> <p>Management Responses: The management will continue the best practice of work.</p> <p>Audit Team Findings: No other issue.</p>

MSP0 Public Summary Report
Revision 2 (Nov 2021)

4	<p>Feedbacks: Settlers’ Representatives and FFB Suppliers – They informed that they have attended meeting with the mill management to discuss the quality of FFB and other issues. There is no land dispute with FGV reported from the settlers. They understand the complaint procedure. They have good relationships with the management. The payment of sales of FFB was made as per agreed.</p>
	<p>Management Responses: The management will continue to maintain good relationship with the settlers and FFB suppliers.</p>
	<p>Audit Team Findings: No other issue.</p>
5	<p>Feedbacks: Foreign Workers – They informed that the management treated them equally without any discrimination of nationalities and religion. They are offered with overtime based on voluntarily basis. There is no restriction on movement where they can go out any time after work. They kept their passport inside the passport lockers prepared by management or kept inside the cupboard inside their house. They were paid according to Minimum Wage Order 2020 and legal requirements.</p>
	<p>Management Responses: The management will continue to maintain good relationship with the workers.</p>
	<p>Audit Team Findings: No other issue.</p>

3.6 List of Stakeholders Contacted

<p>Government Officer: Nil</p>	<p>Community/neighbouring village: Nil</p>
<p>Suppliers/Contractors/Vendors: FFB Transporter Contractor</p>	<p>Worker’s Representative/Gender Committee: Estate managers Mill engineer Supervisors, Staff & Clerks Mill local & foreign workers (process, workshop, etc.) Estate local & foreign workers (harvesters, sprayers, etc.) Local workers representatives Foreign workers representatives Gender committee representative Estate Hospital Assistant</p>

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment <i>Keratong 3 Palm Oil Mill and Supply Base</i> Certification Unit complies with the <i>MS 2530-3:2013</i> and <i>MS 2530-4:2013</i> . It is recommended that the certification of <i>Keratong 3 Palm Oil Mill and Supply Base</i> Certification Unit is approved and/or continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: NOROLSAIFUL HAZRI BIN HAMID	Name: Muhamad Naquiuddin Mazeli
Company name: FGV HOLDINGS BERHAD	Company name: BSI Services (M) Sdn Bhd
Title: Sustainability Manager	Title: Lead Auditor
Signature: 	Signature: 
Date: 10 MAR. 2022	Date: 9/3/2022

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	FGV Group has established Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 29/05/2019 where the objective of this policy is to fulfil the company’s commitments with regards to the sustainability matter. Briefing to the workers was conducted on 1/04/2021 in Keratong 11 Estate. Management of Keratong 3 have provided a memo to all stakeholders dated 11/01/2021 stating all the publicly available documents in the estate, undersigned by the estate manager which was available for verification.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The policy above has emphasized the commitment of FGV to continuously improve its product, services by adopting the best possible approaches to enhance productivity and profitability by optimizing resources and operational efficiencies while minimizing negative impacts on people, social and environment.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Internal Audit Procedure (Doc. No.: FGV/ML-1A/L2-Pr11, Rev. 0 dated 01/06/2016) was developed to ensure the internal audit is carried out for the implementation of RSPO, ISCC and MSPO. The internal audit will be carried out on yearly basis. Internal audit was planned as per the procedure.	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	The last internal audit was carried out on 4-8/08/2021 by SCCD team. Corrective action plan was developed with action taken identified. Root cause was identified with corrective action was developed. This procedure regarding to internal audit can be refer to indicator 4.1.2.1.	Complied
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	Report made available for review in the management review meeting and recorded in the management review meeting minutes. Latest record was on 12/10/2021 attended by 13 persons.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	Management review meeting for MSPO was conducted on 12/10/2021 with total 13 attendees. Meeting minutes was sighted, and the inputs below were discussed accordingly: <ol style="list-style-type: none"> 1. Internal Audit Result 2. Customer feedback 3. Production of FFB 4. Environment 5. Social 6. Replanting 7. Management studies – implementation of MSPO, changes in management, changes in documentation and improvement in MSPO. The management review has included the output and action to be taken.	Complied
Criterion 4.1.4 – Continual Improvement			

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																														
4.1.4.1	<p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p>- Major compliance -</p>	<p>An action plan for continual improvement has been implemented, based on a consideration of the main social and environmental impacts and opportunities.</p> <table border="1"> <thead> <tr> <th></th> <th>Category</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Environmental</td> <td>New fertilizer storage RM 120K - 2022</td> </tr> <tr> <td>2</td> <td>Operation</td> <td>New garage 4 units for tractor parking RM 27K - 2022</td> </tr> <tr> <td>3</td> <td>Operation</td> <td>Multi Grader for road maintenance RM10K -2022</td> </tr> <tr> <td>4</td> <td>Operation</td> <td>Facilitate estate mapping - RM2K - 2022.</td> </tr> <tr> <td>5</td> <td>Safety</td> <td>Ensuring zero accidents in the estate in 2022</td> </tr> <tr> <td>6</td> <td>Social</td> <td>Provision shop construction RM 100K 2022</td> </tr> <tr> <td>7</td> <td>Social</td> <td>Provision for eatery shop RM100K - 2022</td> </tr> <tr> <td>8</td> <td>Social</td> <td>Water filter RM 5K - Nov 2021</td> </tr> <tr> <td>9</td> <td>Social</td> <td>I unit of HILUX for workers internal transportation RM100K - Jun 2022.</td> </tr> </tbody> </table>		Category	Details	1	Environmental	New fertilizer storage RM 120K - 2022	2	Operation	New garage 4 units for tractor parking RM 27K - 2022	3	Operation	Multi Grader for road maintenance RM10K -2022	4	Operation	Facilitate estate mapping - RM2K - 2022.	5	Safety	Ensuring zero accidents in the estate in 2022	6	Social	Provision shop construction RM 100K 2022	7	Social	Provision for eatery shop RM100K - 2022	8	Social	Water filter RM 5K - Nov 2021	9	Social	I unit of HILUX for workers internal transportation RM100K - Jun 2022.	Complied
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4.1.4.2	<p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p>- Major compliance -</p>	<p>There is no new application of new technology implemented during the certification period. The current practices continued and guide by Standard Operation Procedure (SOP).</p> <p>The estate management will implement and monitor any new technologies being implemented and the training of other personnel.</p>	Complied																														
4.1.4.3	<p>An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established.</p> <p>- Major compliance -</p>	<p>No new technology is in place thus far. Currently, Keratong 11 Estate has carried out the training based on the estate's current practices.</p> <p>This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination</p>	Complied																														

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		of information by the RC office and SCCD are transacted during the monthly Managers meetings and emails.	
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance -	The stakeholders were briefed during the stakeholder meeting last conducted on 17/10/2019 and to the FFB suppliers/ settlers on 18/11/2020. Besides, the management has displayed the memo of request of information on the notice board outside the office.	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 -	Management of Keratong 11 Estate has issued a memo on 13/08/2021 to all the stakeholders of Keratong 11 Estate to inform on the list of documents that made available upon request. The memo was publicly displayed at the notice board outside the office. List of documents that made publicly available as below: 1. Land title 2. OSH plan 3. Environmental and social management plan 4. SEIA report 5. HCV report 6. Complaint and grievance procedure 7. Land dispute procedure 8. Policies such as Human Rights and Group Sustainability Policy 9. Assessment report of audits	Complied

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		10. Others Besides, documents such as company’s policies, Supplier Code of Conduct and grievance procedure is accessible by the stakeholders via www.fgvholdings.com/sustainability/ .	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	FGV has established SOP for information request from relevant stakeholders and documented in ‘Komunikasi, Penglibatan dan Rundingan’ with Doc. No.: FGV/ML-1A/L2-Pr12 dated 01/06/2016. The objective of the SOP is to establish an effective system for communication between company and stakeholder. The stakeholders have been briefed on the procedure during stakeholder meeting on 17/10/2019 and the workers were briefed on 14/02/2020. Records of meeting minutes and attendance list were sighted.	Complied
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 sampled estates have appointed the following personnel to be the responsible person in handling the issues related to Indicator 1.	Complied
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	List of stakeholders for all the operating units were last updated n 22/09/2020. The list consists of various group of stakeholders such as government authorities, contractors/suppliers, NGOs, local communities and also internal stakeholders such as workers and representatives. There was no physical stakeholder meeting conducted for Y2021 due to outbreak of COVID-19 pandemic. The management of Keratong 3 POM and supply base has approached to the stakeholders to brief them on the publicly available document that could be requested, prevention of fire usage and complaint procedure, company’s policies on 10/3/2021 in Keratong 3 POM and supply base as per Letter	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		(01)4028/ktg.3/840A/RSP0/2021. There was no issue received by the management from stakeholders.	
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance -	An SOP on traceability titled Standard Operating Procedure for Mill - Traceability has been established with ref no SOP: MLSL(Ed2)-Sec 4(8) dated 01/06/2012. Therein describing information of: a) Person in charge En MM Kamal Yassin Abd Rashid Assistant Manager has been appointed via letter dated 11/01/2021 issued by the Estate Manager. b) FFB flow chart from estate harvesting designated block to mill weighbridge (tickets). The mill processing records the total FFB processed for the day and the storage tank no being stored. The records include opening FFB balances in ramp and cages plus the FFB intake from the estates for the day less the closing FFB balances will provide the total processed. c) The despatch oil from the storage tank follows a similar formula opening stock plus production less the despatch volume will give a closing stock for the day record. d) All records of CPO tank sounding are recorded during the 2 shifts operations.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The estate monitors the despatch to the mill on daily basis to tally and tracking the volume harvesting and tonnage despatch to the mill. Factors on the FFB balances in the fields are accounted for in the process.	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The Person in charge En MM Kamal Yassin Abd Rashid Assistant Manager has been appointed via letter dated 11/01/2021 issued by the Estate Manager. The appointed letter was sighted and verified.	Complied

Criterion / Indicator		Assessment Findings	Compliance																																																
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	<p>The FFB weighbridge ticket/despatch note is produced for all transaction to Keratong 3 POM. The set of documents among others consists of the following information:</p> <ul style="list-style-type: none"> a) Weighbridge ticket <ul style="list-style-type: none"> - Date / D/O no / Quantity / w/bridge operator name - Total Bunches / Quality / field no b) Despatch chit <ul style="list-style-type: none"> - Serial no / field no / no of bunches / tractor no. c) Delivery Note <ul style="list-style-type: none"> - Date/ weight / w/bridge operator / MPOB licence no. d) Grading report for the FFB consignment. <p>The following was sampled with details shown below:</p> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>Pass no</th> <th>Lorry no</th> <th>D/N no</th> <th>mt</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>9/8/21</td> <td>1511845</td> <td>JCN8139</td> <td>07038</td> <td>13.13</td> </tr> <tr> <td>2</td> <td>8/8/21</td> <td>01511731</td> <td>JCN8139</td> <td>07036</td> <td>17.26</td> </tr> <tr> <td>3</td> <td>30/9/21</td> <td>01516791</td> <td>JCN8139</td> <td>07123</td> <td>8.25</td> </tr> <tr> <td>4</td> <td>29/9/21</td> <td>01516678</td> <td>JCN8139</td> <td>07122</td> <td>10.19</td> </tr> <tr> <td>5</td> <td>28/9/21</td> <td>01516574</td> <td>JCN8139</td> <td>07119</td> <td>11.85</td> </tr> <tr> <td>6</td> <td>2/10/21</td> <td>01516881</td> <td>JCN8139</td> <td>07127</td> <td>13.86</td> </tr> <tr> <td>7</td> <td>2/10/21</td> <td>01516874</td> <td>JCN8139</td> <td>07126</td> <td>9.85</td> </tr> </tbody> </table>		Date	Pass no	Lorry no	D/N no	mt	1	9/8/21	1511845	JCN8139	07038	13.13	2	8/8/21	01511731	JCN8139	07036	17.26	3	30/9/21	01516791	JCN8139	07123	8.25	4	29/9/21	01516678	JCN8139	07122	10.19	5	28/9/21	01516574	JCN8139	07119	11.85	6	2/10/21	01516881	JCN8139	07127	13.86	7	2/10/21	01516874	JCN8139	07126	9.85	Complied
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4.3 Principle 3: Compliance to legal requirements																																																			
Criterion 4.3.1 – Regulatory requirements																																																			

Criterion / Indicator		Assessment Findings	Compliance												
4.3.1.1	<p>All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>A mechanism to ensure compliance to legal and other requirement has been documented in Manual Lestari established from the Head Office level.</p> <p>a) 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.</p> <p>b) Thereafter the estates and mill where applicable will be notified via email on the changes/update of LORR for implementation.</p> <p>Licenses/permit viewed as complied by the mill for the legislative requirement among others viewed were as follows.</p> <table border="1"> <thead> <tr> <th></th> <th>Licence/permit</th> <th>Validity Period</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>KPDNKK - Diesel 10920 L</td> <td>26/7/2024</td> </tr> <tr> <td>2</td> <td>MPOB licence 55896-200-2000</td> <td>28/2/2022</td> </tr> <tr> <td>3</td> <td>Metrology Corporation ref 58018135</td> <td>21/4/2022</td> </tr> </tbody> </table>		Licence/permit	Validity Period	1	KPDNKK - Diesel 10920 L	26/7/2024	2	MPOB licence 55896-200-2000	28/2/2022	3	Metrology Corporation ref 58018135	21/4/2022	Complied
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4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>The documented legal register with written information on legal requirements applicable to the estate operation is available. The record titled "<i>Senarai Rujukan Akta Dan Berdaftar Perundangan</i>" 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:</p> <ul style="list-style-type: none"> • Pesticides Act 1974 and Regulations • Environmental Quality Act and Regulations 1974 • Factories and Machinery Act and Regulations, 1967 • Weights and Measures Regulations 1981 • Electricity Regulations 1994 	Complied												

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Immigration Act 1959 • Occupational Safety and Health Act 1994 • Employment Act 1955 • Industrial Relations Act 1967 • Children and Young Persons (Employment) Act 1966 • MPOB Regulations (Licensing) 2005, EQ (Prescribed Premise) (Crude Palm Oil) Regulations 1977 • Industrial Code of Practice for Confined Space 2010 • MPOB licensing Regulation 2005 • Akta Polis 1967 • Akta Pencegahan Dan Pengawalan Penyakit Berjangkit 1988 • Akta Std Min Perumahan dan Kemudahan Pekerja 2019 (Pindaan) • Perintah Gaji Minima 2020. 	
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>The 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.</p>	Complied
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>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 MM Kamal Yassin Abd Rashid Assistant Manager appointed via letter dated 11/01/2021 issued by the Estate Manager.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance																
Criterion 4.3.2 – Lands use rights																			
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	The oil palm cultivation activities for the sampled estates do not diminish the land use rights of other users. The conditions stipulated in the land title was adhered to.	Complied																
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	Keratong 11 Estate was leased to FGV for Oil Palm Plantation activities from FELDA. Tenancy Agreement dated 06/01/2012 and 21/01/2012, which commenced on 01/01/2012 between FELDA and FGV and the agreement will further renew every 3 years up to total 99 years was sighted for Keratong 11 Estate. Seen the land titles as below: 1. Land title# 3649, Lot No.: PT 8142, 628.7 ha 2. Land title# 3648, Lot No.: PT 8141, 567.7 ha	Complied																
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The estate identified boundaries through means of markers and trenches. This confirmed that they have maintained boundary at the visited following points. <table border="1" data-bbox="1034 979 1883 1114"> <thead> <tr> <th></th> <th>Estate</th> <th>Location</th> <th>Boundary Neighbours</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Keratong 11</td> <td>PM 10 C</td> <td>Smallholders</td> </tr> <tr> <td>2</td> <td>Keratong 11</td> <td>PR 21 E</td> <td>Hutan Simpan Lesung</td> </tr> <tr> <td>3</td> <td>Keratong 11</td> <td>PM 00 A</td> <td>Ldg DSK - Far East Holding</td> </tr> </tbody> </table>		Estate	Location	Boundary Neighbours	1	Keratong 11	PM 10 C	Smallholders	2	Keratong 11	PR 21 E	Hutan Simpan Lesung	3	Keratong 11	PM 00 A	Ldg DSK - Far East Holding	Complied
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4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There was no land dispute at all the sampled estates. The company has the legal ownership documents as demonstrated by possessing a land title.	Complied																

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land or negotiated agreements at all the sampled estates.	Not applicable
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. - Minor compliance -	There is no customary land or negotiated agreements at all the sampled estates.	Not applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There is no customary land or negotiated agreements at all the sampled estates.	Not applicable
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	SIA was conducted on 21/08/2019 for Keratong 11 Estate by the Sustainability Compliance and Certification Department. The methodology of the assessment was through sampling of stakeholders to be interviewed. Stakeholders were consulted during the stakeholder meeting as well. Positive and negative impacts were identified and incorporated into the Management Plan 2019/ 2020 dated 21/08/2019. The management plan was last reviewed on 21/09/2020. From the verification the management already review on issue of Delaying in the MyEG service provider on payment which caused the FOMEMA result of workers expired and Deduction of water was made since October 2019 for total RM 10	Complied

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		after the Regional Control Unit's visit on 07/10/2019. The record was available and verified as per interview with workers and management.	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	FGV has established SOP for "Menangani Aduan dan Rugutan" with Doc. No.: FGV/ML-1A/L2-Pr13 dated 01/04/2019. The procedure is to provide a system for the internal and external stakeholders to lodge complaint and grievances to the management. The complaints will be solved in 14 days (first stage), 14 days (second stage). The complaint has to be resolved within 2 months from the date of discussion in third stage. Besides, whistleblowing e-form was available in https://www.fgvholdings.com/whistleblowing/ for the stakeholders to report a grievance. No changes from previous report.	Complied
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	Keratong 11 Estate has implemented Grievance & Complaint Book and Grievance & Complaint Form to allow the workers and stakeholders to lodge complaint on the housing defect. Verification on the record was available and the issue was close according to SOP within 14 days.	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 -	There was a suggestion/ complaint box in front of the office with Complaint & Grievance Form was available. The stakeholders and workers have access to the form to lodge complaint if any.	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 -	The procedures were briefed to the external stakeholders on 17/10/2019 and internal workers on 14/02/2020. Seen the training records. Interviewed with the stakeholders confirmed that they are understand on the process of complaint and grievances.	Complied

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
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 complaints and resolutions for the past 24 months (i.e. from November 2018) were well maintained by the sampled estates and available upon request.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	Keratong 11 Estate has actively engaged with the stakeholders by inviting them to participate any social activities such as festival celebration. This has verified by interview the smallholder neighbouring the estate. The smallholder and settler informed that they have seek advice from the management regarding some of the operation issue.	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	The Group Occupational Safety & Health Management Policy had been established and implemented as follows: 'Pernyataan Polisi Kesehatan Dan Kesehatan 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.	Complied
4.4.4.2	The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented.	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	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance																																				
<ul style="list-style-type: none"> b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: d) all employees involved shall be adequately trained on safe working practices e) all precautions attached to products shall be properly observed and applied f) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). g) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. h) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements. i) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety 	<p>regulations and to target zero accident. Apart from specific session, safety policy and targets were available on display board printed in both English & Bahasa Malaysia.</p> <p>HIRARC for the estate are available and with latest review formalised IN 2008. All the main activities were covered. Details of common estate activities as shown below.</p> <table border="1" data-bbox="1070 625 1883 930"> <thead> <tr> <th>No</th> <th>Activity</th> <th>No</th> <th>Activity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Office</td> <td>9</td> <td>Pruning & harvesting</td> </tr> <tr> <td>2</td> <td>Replanting</td> <td>10</td> <td>EFB application</td> </tr> <tr> <td>3</td> <td>Pest & Disease</td> <td>11</td> <td>Fertiliser application</td> </tr> <tr> <td>4</td> <td>Weeding</td> <td>12</td> <td>Palm Mounding</td> </tr> <tr> <td>5</td> <td>Rat Baiting</td> <td>13</td> <td>Waste management</td> </tr> <tr> <td>6</td> <td>SW storage</td> <td>14</td> <td>Circle raking</td> </tr> <tr> <td>7</td> <td>Road maintenance</td> <td>15</td> <td>Grass cutting</td> </tr> <tr> <td>8</td> <td>Upkeep housing</td> <td>16</td> <td>Motorcycle riding</td> </tr> </tbody> </table> <ul style="list-style-type: none"> b) All HIRARC were verified and approved accordingly. c) The estate provides training to the workers and staff exposed to pesticides and chemicals. Details as available in 4.4.6.1 (training and competency). OSH programs are also included. Common programs are initiated from HQ level e.g. OSH meeting, workplace inspection, inspection on PPE, training on MSPO/RSPO etc. f) The estates provide PPE to the employees such as apron, safety helmets, safety shoes relevant to the work handled by the workers. During the site visit workers were observed to be in PPE. PPE items includes the following: <ul style="list-style-type: none"> i. Mask / Nitrile gloves 	No	Activity	No	Activity	1	Office	9	Pruning & harvesting	2	Replanting	10	EFB application	3	Pest & Disease	11	Fertiliser application	4	Weeding	12	Palm Mounding	5	Rat Baiting	13	Waste management	6	SW storage	14	Circle raking	7	Road maintenance	15	Grass cutting	8	Upkeep housing	16	Motorcycle riding	
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MSPO Public Summary Report
Revision 2 (Nov 2021)

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<p>and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>j) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>k) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>l) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>ii. Dupont apron / Goggles</p> <p>iii. Vest / Safety helmets</p> <p>g) The estate had established SOP for chemical handling and documented is available in the following document.</p> <p>i. Manual Ladang Sawit Lestari</p> <ul style="list-style-type: none"> - Prosedure Kerja Selamat <p>ii. Manual Sustainability</p> <ul style="list-style-type: none"> - Prosedur Kerja Selamat - Prosedur membancuh Racun di PREMIX - Pengendalian Bahan Kimia <p>The document was sighted.</p> <p>h) The Estate Manager is appointed as the Chairman of the ESH committee via letter signed by the Regional Controller dated 02/1/2021. The Manager subsequently assigned duties of ESH coordinator to the Assistant/Staff for the down line implementation of ESH practices in the estate. All identified personnel were officially given a letter for such an appointment.</p> <p>i) 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.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Date</th> <th>Attendee</th> <th></th> <th>Date</th> <th>Attendee</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>15/11/21</td> <td>15</td> <td>3</td> <td>19/5/21</td> <td>16</td> </tr> <tr> <td>2</td> <td>23/8/21</td> <td>15</td> <td>4</td> <td>15/2/21</td> <td>11</td> </tr> </tbody> </table> <p>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</p>			Date	Attendee		Date	Attendee	1	15/11/21	15	3	19/5/21	16	2	23/8/21	15	4	15/2/21	11	
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Criterion / Indicator	Assessment Findings	Compliance
	<p>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:</p> <ul style="list-style-type: none"> <i>i. Lapuran Pemakaian PPE</i> <i>ii. Lapuran Prestasi ESH/Kesehatan</i> <i>iii. Lapuran LatIhan & SOP/HIRARC</i> <i>iv. Lapuran Pematuhan Undang-Undang</i> <i>v. Lapuran Kemalangan Region</i> <i>vi. Lapuran Pemeriksaan Tempat Kerja</i> <i>vii. Lapuran Kesehatan & Kawasan Perumahan</i> <i>viii. Lapuran Bahan Buangan Terjadual/Isu Alam Sekitar</i> <p>j) The accident and emergency procedures are available. There was formation of ERP Team & 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 & flood, chemical spillage. Procedures guidelines were produced by SCCD and amended to tailor to the situation differences in the estate.</p> <p>k) The estate trained their nominated employees for First Aid mainly for those involved in the field operations. A First Aid Kit equipped with 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:</p> <p>Office / AP Post / Chemical Store / Fertiliser Store / Workshop / Field staff / Mandores. The boxes kept by the mandore were sighted during</p>	

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance								
		<p>the field visit. Regular briefing to the 1st Aid Kit holders on the management of the content and usage.</p> <p>l) 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 1 incidence in 2020.</p> <table border="1"> <thead> <tr> <th>Cases</th> <th>LTI</th> <th>Non LTI</th> <th>JKKP 8 submission</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>27</td> <td>0</td> <td>13/1/2021</td> </tr> </tbody> </table> <p>A worker has fallen from a garage roof while attending a repair work. Investigation was made with JKKP 6 submitted on 09/9/2020 to DOSH office. All documents were sighted and verified.</p>	Cases	LTI	Non LTI	JKKP 8 submission	1	27	0	13/1/2021	
Cases	LTI	Non LTI	JKKP 8 submission								
1	27	0	13/1/2021								
Criterion 4.4.5: Employment conditions											
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 29/05/2019 where the company recognizes its responsibility to respect and uphold international principles, standards and practices as encapsulated in the Universal Declaration of Human Rights (UDHR), United Nations Guiding Principles on Business and Human Rights (UNGPR), United Nations Sustainable Development Goals (UNSDGs) and other applicable treaties, subject to the laws and regulations of the countries and territories in which FGV Group operates. Communication to the employees was done in various methods such as briefing during morning muster, display on notice boards and training.</p>	Complied								
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p>	<p>FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 29/05/2019 where all employees and workers shall receive equal treatment based on their relevant merits and competency regardless of gender, race, nationality, religion, age, physical condition, and marital status, reproductive rights of women, union</p>	Complied								

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	membership/ affiliation/ employment status, or political affiliation. All sampled estates had employed Migrant Indonesian and Local workers. Migrant Indonesian workers were recruited on a 2 years contract basis while Local workers were employed on a long-term basis. Both Migrant and Local workers were provided with the wage structure, amenities, etc. The management establish sustainable policy to commit to their transparent respect and recognition of the right of all their employee including contract, temporary and migrant workers as well as people living nearby and adjacent communities. Other support such as job opportunities and amenities such as free housing, water and medical care are given to all employees without discrimination.	
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 -	All the workers are under direct employment. The payslip has included basic income, allowance pay, working days, medical leave, and deduction of salary and others as per employment contract. The payroll for the following sampled workers for Oct 2020 and Sept 2021 were verified to be consistent with the Minimum Wages Order 2020. For the new Minimum Wages Order 2020 implementation 9 workers been sample during this assessment (FW 04830551,04830545, 04830458, 04830567, 04830505, 04830573, 04830571, 04830346, 04830537).	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 -	There are 2 contractors for harvesting and transporting of FFB. Verification of payslip and employment contract has confirmed that employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. The contractor that been sample was Pertiagaan Maju Bera and Wazer Jaya Enterprise.	Complied
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	The workers master list was reviewed. The list includes names, NRIC & Passports numbers, Expiry dates of Passports & Work Permits, date of birth, date joined, gender etc.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -		
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 -	Employees had been provided with fair contracts that have been signed by both employee and employer. Foreign migrant Indonesian workers are recruited with 2 years contract. Local workers are on a long-term employment basis. The following contracts has been verified to confirm that workers have binding working agreement with the company Perniagaan Maju Bera and Wazer Jaya Enterprise.	Complied
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 -	FGV has established a time recording system that makes working hours and overtime transparent. The management implemented "Kad Kerja" system to record the working hours and overtime for all the workers.	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 -	The management of both estates had informed all workers the working hours and breaks times. The working hours and break times complied with legal regulations and collective agreements. The working hours and break time was exhibited on notice boards. Working time was from 6.30am to 2.30pm while the break time was from 11.00am to 11.30am.	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 -	The payslip and the inputs were reviewed to confirm the wages and overtime is in line with legal requirements of Employment Act 1955 and worker's employment contract. For the implementation 9 workers been sample during this assessment (FW 04830551,04830545, 04830458, 04830567, 04830505, 04830573, 04830571, 04830346, 04830537).	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - Minor compliance -	The company provides free medical benefit and free housing to foreign workers. In addition, there is free school bus provided for local's children to go and back from school, football field, mosque, community hall was provided.	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. - Major compliance -	All workers are provided with housing facilities that furnish with sanitation facilities, water supplies, electricity and amenities such praying house. Water and electricity are connected to the national supply and grid. Water and electricity usage are subsidized by the company and these conditions are stated in the collective agreement. Interview with workers confirms that there is no issue related to the payment of water and electricity. Keratong 11 Estate has carried out linesite inspection to ensure the cleanliness and safety of the houses by person in charge. The housing complex was in clean and good condition as verified during site visit.	Complied
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. - Major compliance -	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where 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. Briefing of the policy was conducted on 1/04/2021 in Keratong 11 Estate.	Complied

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.13	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where FGV Group recognizes and respects employees' right to freedom of association and to collective bargaining. Briefing of the policy was conducted on 16/3/2021 in Keratong 11 Estate and 04/05/2021 in Keratong 3 POM. FGV Palm Industries Sdn Bhd has signed a Collective Agreement with <i>Kesatuan Pekerja-pekerja FGV Palm Industries Sdn Bhd Semenanjung</i> which valid from 01/01/2019 to 31/12/2021 (Cog. No.: 031/2020) which valid from 01/01/2019 to 31/12/2021. FGVASSB has developed <i>Manual Panduan Kadar Upah Kerja, Bil 07/2020</i> which effective on 01/02/2020. Details such as promotion, notice period, resignation, annual leave, increment of salary, medical leave, maternity leave and overtime were outlined in the agreement. Sampled total 20 workers agreement for both local and foreign workers in mill and estate are reviewed. The agreements are signed in local language for different nationalities. Interviewed with the workers confirmed that they understood the terms and conditions of employment contracts and pay slips.</p>	Complied
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not expose to hazardous working conditions.</p> <p>- Major compliance -</p>	<p>FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where FGV is committed to employing only persons of the age of 18 and above, FGV recognises that Malaysian laws allow for young persons to be engaged in certain forms of employment. Therefore, no person shall be employed under the age of 15, and any employment of young persons shall not be in a manner that is likely to be hazardous, or to interfere with such person's education, or to be harmful to the person's health or physical, mental, spiritual, moral, or social development at any stage of the employment. The contractors have signed on the SCOC where under Clause 3.2 has outlined that they shall not employ child labour underage of 18. Briefing of the policy was conducted on 21/01/2021 in Keratong 11 Estate.</p>	Complied

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance																																																																			
Criterion 4.4.6: Training and competency																																																																					
4.4.6.1	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p>- Major compliance -</p>	<p>Training were provided during musters and in session held in the estate community hall. The following training made for the employees were recorded as follows. Subjects extracted were mainly related to ESH, SOPs, and pesticide handling.</p> <table border="1" data-bbox="1032 632 1890 1369"> <thead> <tr> <th>No</th> <th>Subject</th> <th>Date</th> </tr> </thead> <tbody> <tr><td>1</td><td>Company Policies Briefing</td><td>18/1/21</td></tr> <tr><td>2</td><td>Harvesting safety</td><td>24/11/21</td></tr> <tr><td>3</td><td>Tractors driving SOP</td><td>24/12/20</td></tr> <tr><td>4</td><td>PPE adherence - Spraying</td><td>09/9/21</td></tr> <tr><td>5</td><td>Fertilizer application</td><td>16/9/20</td></tr> <tr><td>6</td><td>Harvesting SOP - PPE</td><td>05/10/21</td></tr> <tr><td>7</td><td>Buffer zone conservation</td><td>18/11/21</td></tr> <tr><td>8</td><td>Fire Drill - ERP</td><td>22/3/21</td></tr> <tr><td>9</td><td>Sustainability Awareness</td><td>12/11/21</td></tr> <tr><td>10</td><td>Chemical spillage ERP</td><td>28/10/21</td></tr> <tr><td>11</td><td>First Aid - Refresher briefing</td><td>11/3/21</td></tr> <tr><td>12</td><td>Beneficial plant SOP</td><td>25/10/21</td></tr> <tr><td>13</td><td>Rat Baiting</td><td>21/8/21</td></tr> <tr><td>14</td><td>SW - Waste management</td><td>09/7/21</td></tr> <tr><td>15</td><td>Fire extinguisher</td><td>28/5/21</td></tr> <tr><td>16</td><td>Workplace inspection</td><td>30/6/21</td></tr> <tr><td>17</td><td>Medical surveillance awareness</td><td>15/12/20</td></tr> <tr><td>18</td><td>Chemical spraying</td><td>27/8/21</td></tr> <tr><td>19</td><td>Replanting</td><td>16/11/21</td></tr> <tr><td>20</td><td>Fire Drill & Extinguisher</td><td>22/03/21</td></tr> <tr><td>21</td><td>IPM management</td><td>01/11/21</td></tr> </tbody> </table>	No	Subject	Date	1	Company Policies Briefing	18/1/21	2	Harvesting safety	24/11/21	3	Tractors driving SOP	24/12/20	4	PPE adherence - Spraying	09/9/21	5	Fertilizer application	16/9/20	6	Harvesting SOP - PPE	05/10/21	7	Buffer zone conservation	18/11/21	8	Fire Drill - ERP	22/3/21	9	Sustainability Awareness	12/11/21	10	Chemical spillage ERP	28/10/21	11	First Aid - Refresher briefing	11/3/21	12	Beneficial plant SOP	25/10/21	13	Rat Baiting	21/8/21	14	SW - Waste management	09/7/21	15	Fire extinguisher	28/5/21	16	Workplace inspection	30/6/21	17	Medical surveillance awareness	15/12/20	18	Chemical spraying	27/8/21	19	Replanting	16/11/21	20	Fire Drill & Extinguisher	22/03/21	21	IPM management	01/11/21	<p>Complied</p>
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MSP0 Public Summary Report
Revision 2 (Nov 2021)

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		22	Working hours	02/11/21																																																				
		23	Protection HCV riparian zone	01/4/21																																																				
		24	Work discipline SOP	29/9/21																																																				
		25	Driving SOP & PPE	01/4/21																																																				
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		29	Spraying P& D	27/5/21																																																				
		30	COVID-19 reminders - MCO	23/10/21																																																				
		31	Sexual harassment/Gender rights	03/3/21																																																				
		32	TKI induction program	20/10/21																																																				
		33	Safety SOP - Smallholders	29/10/20																																																				
		Training for the estate is an on-going activity and held along with the annual program.																																																						
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>The training needs for the estate for the 2021 program has been established. The details of the training needs include categories of job descriptions, sections, and employees' group. Included in this program are subjects among others are:</p> <table border="1"> <thead> <tr> <th></th> <th>Subject</th> <th>Jan-Apr</th> <th>May- Aug</th> <th>Sept- Dec</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Safety driving</td> <td>/</td> <td>-</td> <td>-</td> </tr> <tr> <td>2</td> <td>HIRARC OSH</td> <td>-</td> <td>/</td> <td>-</td> </tr> <tr> <td>3</td> <td>First Aider</td> <td>-</td> <td>/</td> <td>-</td> </tr> <tr> <td>4</td> <td>Mini tractor driving</td> <td>-</td> <td>/</td> <td>-</td> </tr> <tr> <td>5</td> <td>Scheduled waste</td> <td>-</td> <td>-</td> <td>/</td> </tr> <tr> <td>6</td> <td>Safety awareness /ERP</td> <td>-</td> <td>-</td> <td>/</td> </tr> <tr> <td>7</td> <td>Chemical handling/PPE</td> <td>-</td> <td>-</td> <td>/</td> </tr> <tr> <td>8</td> <td>FFB quality /harvesting</td> <td>/</td> <td>-</td> <td>-</td> </tr> <tr> <td>9</td> <td>Scheduled waste /ERP</td> <td>-</td> <td>-</td> <td>/</td> </tr> </tbody> </table>					Subject	Jan-Apr	May- Aug	Sept- Dec	1	Safety driving	/	-	-	2	HIRARC OSH	-	/	-	3	First Aider	-	/	-	4	Mini tractor driving	-	/	-	5	Scheduled waste	-	-	/	6	Safety awareness /ERP	-	-	/	7	Chemical handling/PPE	-	-	/	8	FFB quality /harvesting	/	-	-	9	Scheduled waste /ERP	-	-	/	Complied
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Criterion / Indicator		Assessment Findings	Compliance
		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 summarised in the OSH program. This is in compliance and detailed in 4.4.6.1 above. Training program are made on annual basis. In addition, it is subject for a review during the financial year should need arises.	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	There is a Group Policy titled "Pernyataan Polisi Alam Sekitar FGV Holdings Berhad" dated 05/11/2021 signed by the Group CEO mainly in relation to environmental protection. Therein the policy among others contained commitment towards; i. To protecting the environment and conserving biodiversity through sustainable development. ii. Abide by all legislative requirement iii. Manages environmental risk and providing reasonable resources to minimise risk and pollution to environment iv. Continuing and improving efficiency towards enhancing environment. From field visits and interviews with the workers there is no open burning being practiced in the estate.	Complied

Criterion / Indicator		Assessment Findings		Compliance																																													
<p>4.5.1.2</p> <p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations.</p> <p>- Major compliance -</p>	<p>The aspect and impact analysis for all the estate operations are documented on Aug 2017 and revised annually latest being on 03/8/21. In the comprehensive report, the study of aspect and impact are aimed to:</p> <p>i. Plan to avoid negative impact and to promote positive impacts.</p> <p>ii. Reduction disposal of waste taking into consideration of social responsibilities.</p> <p>iii. Plan to reduce pollution and release of GHG</p> <p>iv. Development and implementations.</p> <p>Aspect and impact covered the following activities/operations among others:</p> <table border="1"> <thead> <tr> <th></th> <th>Activities</th> <th></th> <th>Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Poisoning of VOPs/ woodies</td> <td>9</td> <td>Grass slashing</td> </tr> <tr> <td>2</td> <td>Circle spraying</td> <td>10</td> <td>Fertiliser application</td> </tr> <tr> <td>3</td> <td>Management of empty containers</td> <td>11</td> <td>Grading of FFB</td> </tr> <tr> <td>4</td> <td>Rat baiting</td> <td>12</td> <td>Vehicle maintenance</td> </tr> <tr> <td>5</td> <td>Triple rinsing</td> <td>13</td> <td>Chemical storage</td> </tr> <tr> <td>6</td> <td>Drainage construction</td> <td>14</td> <td>P & D census</td> </tr> <tr> <td>7</td> <td>Rat Baiting</td> <td>15</td> <td>Boundary maintenance</td> </tr> <tr> <td>8</td> <td>Road maintenance</td> <td>16</td> <td>Landfill management</td> </tr> </tbody> </table> <p>Management Plan & Initiative to reduce the impact on is listed below:</p> <table border="1"> <thead> <tr> <th></th> <th>Impact</th> <th>Source</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Soil pollution</td> <td rowspan="2">Empty chemical containers</td> <td rowspan="2">Recycle used containers into a safe use. Disposed to a registered LSH Recycler Enterprise.</td> </tr> <tr> <td>2</td> <td>Water pollution</td> </tr> </tbody> </table>			Activities		Activities	1	Poisoning of VOPs/ woodies	9	Grass slashing	2	Circle spraying	10	Fertiliser application	3	Management of empty containers	11	Grading of FFB	4	Rat baiting	12	Vehicle maintenance	5	Triple rinsing	13	Chemical storage	6	Drainage construction	14	P & D census	7	Rat Baiting	15	Boundary maintenance	8	Road maintenance	16	Landfill management		Impact	Source	Action Plan	1	Soil pollution	Empty chemical containers	Recycle used containers into a safe use. Disposed to a registered LSH Recycler Enterprise.	2	Water pollution	<p>Complied</p>
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		<p>Additionally, the following efforts were initiated by the management to reduce impact on the environment:</p> <table border="1"> <thead> <tr> <th></th> <th>Issue</th> <th>Initiative</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reduce chemical spillage</td> <td>Implement mixing at designated area (store area)</td> </tr> <tr> <td>2</td> <td>Smoke emission from vehicles</td> <td>Implement PMV</td> </tr> <tr> <td>3</td> <td>Diesel spillage during infilling of fuel</td> <td>Establish trap, tray & spill kit</td> </tr> </tbody> </table>		Issue	Initiative	1	Reduce chemical spillage	Implement mixing at designated area (store area)	2	Smoke emission from vehicles	Implement PMV	3	Diesel spillage during infilling of fuel	Establish trap, tray & spill kit	
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4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>The estate has established an environmental improvement plan with details to reduce and control the pollution (negative impacts) and action plan to sustain the environmental impact (positive) has been developed with details as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Jadual</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>4.1</td> <td>Rumusan Skor Untuk Impak Negatif Alam Sekitar Paling KETARA</td> </tr> <tr> <td>2</td> <td>4.2</td> <td>Pelan Pengurusan (Management Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang</td> </tr> <tr> <td>3</td> <td>4.3</td> <td>Pelan Tindakan (Action Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang Dan Mengawal Pencemaran (Impak Positif)</td> </tr> </tbody> </table> <p>All the above documents were dated on 11/1/2021 and subject to review annually.</p>		Jadual	Details	1	4.1	Rumusan Skor Untuk Impak Negatif Alam Sekitar Paling KETARA	2	4.2	Pelan Pengurusan (Management Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang	3	4.3	Pelan Tindakan (Action Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang Dan Mengawal Pencemaran (Impak Positif)	Complied
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4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>The program to promote the positive impacts is illustrated in 4.5.1.2 and 4.5.1.3 above.</p> <table border="1"> <tbody> <tr> <td>1</td> <td>Environmental</td> <td>New fertilizer storage RM 120K - 2022</td> </tr> <tr> <td>2</td> <td>Operation</td> <td>New garage 4 units for tractor parking RM27K - 2022</td> </tr> </tbody> </table>	1	Environmental	New fertilizer storage RM 120K - 2022	2	Operation	New garage 4 units for tractor parking RM27K - 2022	Complied						
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		3	Operation	Multi Grader for road maintenance RM10K 2022			
		4	Operation	Facilitate estate mapping - RM2K - 2022			
		5	Safety	Memastikan kemalangan sifar di dalam ladang tahun 2022			
		6	Social	Provision shop construction RM 100K 2022			
		7	Social	Provision for eatery shop RM100K - 2022			
		8	Social	Water filter RM 5K - Nov 2021			
		9	Social	I unit of HILUX for workers internal transportation RM100K - Jun 2022			
		10	Social	Yasin Reading Ceremony to instil spiritual values among the community			
		11	Social	Program Kesihatan Ibu - Dec 2021			
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	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:				Complied	
		No	Subject	No	Subject		
		1	Chemicals handling	4	HCV / RTE		
		2	Scheduled waste	5	Soil pollution		
		3	Buffer zone protection	6	Water pollution		
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.				Complied	
			Date	Attendee		Date	Attendee
		1	15/11/21	15	3	19/5/21	16

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		2	23/8/21	15	4	15/2/21	11																																				
		<p>Sighted minutes of meeting available in the ESH meetings. Agenda in relation to environmental among others include:</p> <ul style="list-style-type: none"> <i>i. Lapuran Pematuhan Undang-Undang</i> <i>ii. Lapuran Kesehatan & Kawasan Perumahan</i> <i>iii. Lapuran Bahan Buangan Terjadual/Isu Alam Sekitar</i> <p>In addition, the management organised EPMC (Environmental Performance Monitoring Committee) yearly. Issues were related to the environmental performance of all units within the Region. Recent being on 23/08/2021.</p>																																									
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																																											
4.5.2.1	<p>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.</p> <p>- Major compliance -</p>	<p>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.</p> <table border="1"> <thead> <tr> <th>Month 21</th> <th>Diesel/ L</th> <th>FFB mt</th> <th>Diesel /FFB</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>579</td><td>4816</td><td>8.32</td></tr> <tr><td>Feb</td><td>515</td><td>4613</td><td>8.96</td></tr> <tr><td>Mac</td><td>618</td><td>4902</td><td>7.92</td></tr> <tr><td>April</td><td>698</td><td>5008</td><td>7.17</td></tr> <tr><td>May</td><td>842</td><td>4832</td><td>5.74</td></tr> <tr><td>June</td><td>838</td><td>4986</td><td>5.95</td></tr> <tr><td>July</td><td>781</td><td>4598</td><td>5.89</td></tr> <tr><td>Aug</td><td>755</td><td>4633</td><td>6.14</td></tr> </tbody> </table>					Month 21	Diesel/ L	FFB mt	Diesel /FFB	Jan	579	4816	8.32	Feb	515	4613	8.96	Mac	618	4902	7.92	April	698	5008	7.17	May	842	4832	5.74	June	838	4986	5.95	July	781	4598	5.89	Aug	755	4633	6.14	Complied
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings				Compliance													
		Sept	174	2807	16.12														
		Oct	624	5133	8.22														
		<p>The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Backhoe tractor/ Machines</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel</td> </tr> <tr> <td>2</td> <td>Van/ Supervisory vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.</td> </tr> <tr> <td>3</td> <td>Electrical supply</td> <td>To reduce reliance on gen-sets for power supply</td> <td>Utilization of TNB sources</td> </tr> </tbody> </table> <p>Performance variation in view of several factors i.e.</p> <ul style="list-style-type: none"> a) Infrastructure of estates, b) Community size / no of gen-sets, c) No. of vehicles / age of machine. d) Weather interference / crop production volume 					No	Target	Objective	Action plan	1	Backhoe tractor/ Machines	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel	2	Van/ Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.	3
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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 estate made estimate on the diesel consumption in the annual budget. Mainly the diesel usage is for the estate machinery for FFB collection and transportation to the mill.	Complied												
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	There was no opportunity to use renewable energy in the estate at current technology. Mainly such practices are made in the mills whereby fibres and shell are used as fuel in the boiler for steam production thereafter for power generation.	Complied												
Criterion 4.5.3: Waste management and disposal															
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	<p>Keratong 11 Estate 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 estate and mill operations among others as summarized below:</p> <table border="1"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>Land</td> <td>Scheduled waste, domestic waste and industrial/process waste</td> </tr> </tbody> </table>		Receptor	Sources	1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG	2	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	Land	Scheduled waste, domestic waste and industrial/process waste	Complied
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4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <ul style="list-style-type: none"> a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products <p>- Major compliance -</p>	<p>Keratong 11 Estate had established SOP for chemical handling. The SOP of handling of chemicals is available in the following document:</p> <ul style="list-style-type: none"> i. Manual Ladang Sawit Lestari <ul style="list-style-type: none"> - Prosedure Kerja Selamat ii. Manual Sustainability <ul style="list-style-type: none"> - Prosedur Kerja Selamat - Prosedur membancuh Racun di PREMIX - Pengendalian Bahan Kimia <p>a) Waste Management Plan 2021 has been established prepared by SCCD and verified by the Assistants/Manager.</p>	Complied																											

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance																				
	<p>b) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained, and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.</p> <p>c) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The scheduled waste is disposed to Kualiti Alam Sdn Bhd registered with DOE.</p> <table border="1" data-bbox="1072 794 1883 898"> <thead> <tr> <th>Estate</th> <th>Date</th> <th>SW 305</th> <th>SW 409</th> <th>SW 410</th> </tr> </thead> <tbody> <tr> <td rowspan="2">K11E</td> <td>18/11/19</td> <td>0.020</td> <td>0.11</td> <td></td> </tr> <tr> <td>26/11/20</td> <td>0.028</td> <td>0.064</td> <td>0.014</td> </tr> </tbody> </table> <p>Domestic waste for the operating units in CU was disposed as follows:</p> <table border="1" data-bbox="1072 986 1662 1054"> <thead> <tr> <th>Estate</th> <th>Landfill site</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>K11E</td> <td>Blk 06 PM00A</td> <td>Collection 2/3x week</td> </tr> </tbody> </table> <p>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 has been categorized as follows;</p> <ul style="list-style-type: none"> a) <i>Sisa pepejal komersial / pembinaan</i> b) <i>Sisa pepejal isi rumah / perindustrian.</i> c) <i>Sisa pepejal keinstitusian</i> d) <i>Sisa pepejal import / awam.</i> 	Estate	Date	SW 305	SW 409	SW 410	K11E	18/11/19	0.020	0.11		26/11/20	0.028	0.064	0.014	Estate	Landfill site	Remarks	K11E	Blk 06 PM00A	Collection 2/3x week	
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Criterion / Indicator		Assessment Findings	Compliance
		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 landfill site 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	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>FGV POM and the estate had established SOP for chemical handling. The SOP of handling of chemicals is available in the following document</p> <ul style="list-style-type: none"> i. Manual Ladang Sawit Lestari <ul style="list-style-type: none"> - Prosedure Kerja Selamat ii. Manual Sustainability <ul style="list-style-type: none"> - Prosedur Kerja Selamat - Prosedur membancuh Racun di PREMIX - Pengendalian Bahan Kimia - Pengurusan Bahan Buangan <p>The procedures for handling used chemicals classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by 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:</p> <ul style="list-style-type: none"> i. Management of class 2 (and higher) chemical containers. ii. Management of fertiliser bags 	Complied

Criterion / Indicator		Assessment Findings	Compliance						
		These documents were established on 01/6/2016 issued throughout the Group Estates and remain effective for practice in all operating units.							
4.5.3.4	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p>- Major compliance -</p>	<p>This is available and detailed in document titled "KITAR SEMULA BEKAS RACUN PEROSAK' The objective of the guidelines is to:</p> <ul style="list-style-type: none"> i. Memelihara kesejahteraan alam sekitar ii. To comply with the gap iii. Avoid misuse of empty pesticide containers. <p>The guidelines also reasoned out the need of triple rinsing and produced the quantity of remaining residue after the triple rinsing.</p> <p>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:</p> <ul style="list-style-type: none"> 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. <p>These guidelines are based on Department of Agriculture ref 91/120/038/014 dated 7/11/2002.</p>	Complied						
4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p>	<p>Domestic waste for the estate was disposed as follows:</p> <table border="1" data-bbox="1032 1209 1691 1278"> <thead> <tr> <th>Estate</th> <th>Landfill site</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>K11E</td> <td>Blk 06 PM00A</td> <td>Collection 2/3 x week</td> </tr> </tbody> </table> <p>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.</p>	Estate	Landfill site	Remarks	K11E	Blk 06 PM00A	Collection 2/3 x week	Complied
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Criterion / Indicator		Assessment Findings	Compliance												
Criterion 4.5.4: Reduction of pollution and emission															
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	<p>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.</p> <table border="1"> <thead> <tr> <th></th> <th>Pollution</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Vehicle & gen-sets</td> </tr> <tr> <td>2</td> <td>Water</td> <td>cleaning water & run-off</td> </tr> <tr> <td>3</td> <td>Land</td> <td>SW, domestic waste & industrial waste</td> </tr> </tbody> </table> <p>The GHG final emissions summarised from the estate activities is shown as tCO2e/tFFB</p>		Pollution	Source	1	Air	Vehicle & gen-sets	2	Water	cleaning water & run-off	3	Land	SW, domestic waste & industrial waste	Complied
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4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	<p>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:</p> <table border="1"> <thead> <tr> <th></th> <th>Sources/objective & target</th> <th>Action steps</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Management of HCV river reserve where applicable</td> <td>To train/ retrain sprayers/ manuring gang to avoid any chemical-related works at the area</td> </tr> <tr> <td>2</td> <td>To monitor waste management plan for its suitability</td> <td>SW disposal monitoring. Delivery to Kualiti Alam Sdn Bhd</td> </tr> <tr> <td>3</td> <td>To improve employees awareness on pollution prevention at housing</td> <td>Continuous reminders</td> </tr> </tbody> </table>		Sources/objective & target	Action steps	1	Management of HCV river reserve where applicable	To train/ retrain 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 Kualiti Alam Sdn Bhd	3	To improve employees awareness on pollution prevention at housing	Continuous reminders	Complied
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			complex including zero burning policy.																																										
		4	To minimise spillage of oil/chemical onto the ground	Continuous training and use of spill trays																																									
		5	To review aspect identification & impact evaluation to identify significant critical points for control.	Review through EA/EIE																																									
Criterion 4.5.5: Natural water resources																																													
4.5.5.1	<p>The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate. 	<p>a) This document is available titled 'Pelan Pengurusan Air Tahun 2021' Therein among others illustrating identification of water source e.g. river, mode of measurement, risk event & cause of risk event, preventive & corrective measures, and PIC (person in charge)</p> <p>The management also records the rainfall data (Rekod Hujan Bulanan Tahun 2021 for better monitoring of the palm growth. Rainfall records for the estate in 2021 as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Month</th> <th>mm</th> <th></th> <th>Month</th> <th>mm</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jan</td> <td>635</td> <td>7</td> <td>July</td> <td>57.5</td> </tr> <tr> <td>2</td> <td>Feb</td> <td>7.0</td> <td>8</td> <td>Aug</td> <td>61.5</td> </tr> <tr> <td>3</td> <td>Mac</td> <td>159.2</td> <td>9</td> <td>Sept</td> <td>88.50</td> </tr> <tr> <td>4</td> <td>April</td> <td>176.5</td> <td>10</td> <td>Oct</td> <td>60.0</td> </tr> <tr> <td>5</td> <td>May</td> <td>50.0</td> <td>11</td> <td>Nov</td> <td>220.5</td> </tr> <tr> <td>6</td> <td>June</td> <td>105.5</td> <td>12</td> <td>Dec</td> <td>-</td> </tr> </tbody> </table> <p>b) The policy for the protection of watercourse is made known to all employees for an effective implementation when the need arises. The</p>		Month	mm		Month	mm	1	Jan	635	7	July	57.5	2	Feb	7.0	8	Aug	61.5	3	Mac	159.2	9	Sept	88.50	4	April	176.5	10	Oct	60.0	5	May	50.0	11	Nov	220.5	6	June	105.5	12	Dec	-	Complied
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<p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>		<p>estate used water supply form PAIP hence does not require an internal water treatment for the domestic consumption.</p> <p>Water sampling at Sg Kemabai is made annually with recent results shown below. There was closure of estates operations during the MCO period lapsing the 2020 sampling.</p> <table border="1"> <thead> <tr> <th colspan="2">K11E</th> <th colspan="2">18/11/21</th> <th colspan="2">14/8/19</th> </tr> <tr> <th></th> <th>Parameter</th> <th>Unit</th> <th>Hulu</th> <th>Hilir</th> <th>Hulu</th> <th>Hilir</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>-</td> <td>5.07</td> <td>5.44</td> <td>4.63</td> <td>Draught</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>mg/L</td> <td>1</td> <td>1</td> <td>1</td> <td>-</td> </tr> <tr> <td>3</td> <td>COD</td> <td>mg/L</td> <td>3</td> <td>5</td> <td>5</td> <td>-</td> </tr> <tr> <td>4</td> <td>DO</td> <td>mg/L</td> <td>5.94</td> <td>6.83</td> <td>8.0</td> <td>-</td> </tr> <tr> <td>5</td> <td>S Solids</td> <td>mg/L</td> <td>22</td> <td>14</td> <td>2</td> <td>-</td> </tr> <tr> <td>8</td> <td>T Nitrogen</td> <td>mg/L</td> <td>0.2</td> <td>0.1</td> <td>0.1</td> <td>-</td> </tr> </tbody> </table> <p>c) The estate water management plan has been established and reviewed in Jan 2021. Among others the plan therein emphasized;</p> <ul style="list-style-type: none"> rainwater harvesting for cleaning purposes, water from the reservoir/catchment for the estate operations continual training for workers on water efficiency consumption <p>d) Buffer zones were protected. Areas visited for the estates as tabled below:</p> <table border="1"> <thead> <tr> <th></th> <th>Estate/Mill</th> <th>Location</th> <th>Field no</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>Keratong 11</td> <td>Sg Kemabai</td> <td>PM00A/PR18D</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>River width</th> <th>Bufferzone</th> </tr> </thead> <tbody> <tr> <td>>40 m</td> <td>50 m</td> </tr> </tbody> </table>						K11E		18/11/21		14/8/19			Parameter	Unit	Hulu	Hilir	Hulu	Hilir	1	PH	-	5.07	5.44	4.63	Draught	2	BOD	mg/L	1	1	1	-	3	COD	mg/L	3	5	5	-	4	DO	mg/L	5.94	6.83	8.0	-	5	S Solids	mg/L	22	14	2	-	8	T Nitrogen	mg/L	0.2	0.1	0.1	-		Estate/Mill	Location	Field no	2	Keratong 11	Sg Kemabai	PM00A/PR18D	River width	Bufferzone	>40 m	50 m	
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20 – 40 m	40 m										
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4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	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 to benefit the nearest palm at the pit end to obtain additional moisture.	Complied								
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value											

Criterion / Indicator		Assessment Findings	Compliance
4.5.6.1	<p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <ul style="list-style-type: none"> a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. <p>- Major compliance -</p>	<p>The latest assessment was conducted with details as follows: "Laporan Penilaian Konservasi Tinggi (HCV) & Biodiversiti; Ladang FGVPM Keratong 11 dated 27/12/2017. Thereafter being reviewed on 11/10/2021. This report was updated and reviewed by En Amir Hamzah Dollah@Abdullah from the Due Diligence Unit, Plantations Sustainability Department.</p> <p>In summary there was no HCV present in the CU except for buffer zone for Sungai Kemabai flowing inlet at P18B and outlet at PR21E. 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:</p> <ul style="list-style-type: none"> a) General biodiversity issues b) Watercourses and drainage c) Habitats natural and man-made d) Wildlife e) Ponds and reservoirs f) Wetlands /watercourses g) Legal aspects h) Immediate and long term effect. 	Complied
4.5.6.2	<p>If rare, threatened or endangered species or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <ul style="list-style-type: none"> a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to 	<p>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:</p> <ul style="list-style-type: none"> 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

Criterion / Indicator		Assessment Findings	Compliance
	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 observed 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
Criterion 4.5.7: Zero burning practices			
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -	<p>FGV practices of "Zero open burning" is enforced and elaborated in the Group Sustainability Policy dated May 2019. Also included in the following guidelines:</p> <ul style="list-style-type: none"> i. Manual Ladang Sawit Lestari <ul style="list-style-type: none"> - Prosedure Kerja Selamat ii. Manual Sustainability <ul style="list-style-type: none"> - Prosedur Kerja Selamat - Prosedur membancuh Racun di PREMIX - Pengendalian Bahan Kimia - Penyediaan tanah tanam semula <p>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.</p>	Complied
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop.	N/A. No special approval from the relevant authorities.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
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 -	N/A. No controlled burning is allowed.	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 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	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: Manual Ladang Sawit LESTARI on reviewed 1/6/12 Sawit pra matang edisi II seksyen 3 Manual Ladang Sawit LESTARI reviewed on 1/6/12 Sawit matang edisi II seksyen 4 Manual Ladang Sawit LESTARI 1/6/12 Pembajaan sawit edisi II seksyen 5 Prosedur Kerja Selamat Manual Kelestarian (Sustainability)	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																							
		<p>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.</p> <table border="1"> <thead> <tr> <th></th> <th>Areas</th> <th>Action/Activities</th> </tr> </thead> <tbody> <tr> <td rowspan="3">1</td> <td rowspan="3">Daily</td> <td>Supervision by field staff/Assist/Manager</td> </tr> <tr> <td>Report of daily activities/costings/variation</td> </tr> <tr> <td>WA group - digital supervision</td> </tr> <tr> <td rowspan="6">2</td> <td rowspan="6">Schedule</td> <td>Quarterly ESH meeting</td> </tr> <tr> <td>RC visits on field activities</td> </tr> <tr> <td>Internal audits by GCAD/SHO</td> </tr> <tr> <td>Annual EPMC</td> </tr> <tr> <td>External audit RSPO /MSPO</td> </tr> <tr> <td>PA visits / Agronomist visits</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">Medical /health</td> <td>Zone Head / Regional Controller visits</td> </tr> <tr> <td>Monthly check by HA/MA</td> </tr> <tr> <td></td> <td></td> <td>Annual medical surveillance</td> </tr> </tbody> </table>		Areas	Action/Activities	1	Daily	Supervision by field staff/Assist/Manager	Report of daily activities/costings/variation	WA group - digital supervision	2	Schedule	Quarterly ESH meeting	RC visits on field activities	Internal audits by GCAD/SHO	Annual EPMC	External audit RSPO /MSPO	PA visits / Agronomist visits	3	Medical /health	Zone Head / Regional Controller visits	Monthly check by HA/MA			Annual medical surveillance	
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4.6.1.2	<p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p>- Major compliance -</p>	<p>The estate constructs terraces at slope area of more than 6 degrees for the replanting fields. Plantings of cover crop are made to retain the soil structure and conservation.</p> <ul style="list-style-type: none"> i. Roadside pit is made to divert water at slope areas to prevent road erosion and surface damage. ii. Terraces are constructed inclined towards the terrace wall. 	Complied																							

Criterion / Indicator		Assessment Findings	Compliance
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
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	The 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 the estate was 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 FGVP 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 - Labour benefit summary / Labour reconciliation - Yield statement oil palm	Complied

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																																																																																				
		<ul style="list-style-type: none"> - Summary of vehicle and running schedule - Job allocation for vehicles / Summary of workshop running schedule - Summary if budget / Summary of general charges - CAPEX, oil palm matures and young mature <p>Format of estate summary expenditure is as per the following content. Figures were extracted out for reason of confidentiality.</p> <table border="1"> <thead> <tr> <th>Year</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Mature Ha</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Immature Ha</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Total Planted Ha</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>FFB Tons</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Yield /Ha</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>RM/mt FFB</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>RM//Ha</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> </tbody> </table> <p>Component of operating expenditure among other includes:</p> <table border="1"> <thead> <tr> <th></th> <th>Activities</th> <th></th> <th>Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Merumput</td> <td>9</td> <td>Sanitasi pokok</td> </tr> <tr> <td>2</td> <td>Membaja</td> <td>10</td> <td>Sempadan & ukur</td> </tr> <tr> <td>3</td> <td>Parit</td> <td>11</td> <td>Menyulam</td> </tr> <tr> <td>4</td> <td>Jalan & jambatan</td> <td>12</td> <td>Penyeliaan am</td> </tr> <tr> <td>5</td> <td>Pemuliharaan tanah/air</td> <td>13</td> <td>Sanitasi pokok</td> </tr> <tr> <td>6</td> <td>Mencantas</td> <td>14</td> <td>Sempadan & ukur</td> </tr> <tr> <td>7</td> <td>Buruh</td> <td>15</td> <td>Penyeliaan</td> </tr> <tr> <td>8</td> <td>Pengangkutan</td> <td>16</td> <td>Peralatan</td> </tr> </tbody> </table>	Year	2021	2022	2023	2024	2025	Mature Ha	X	X	X	X	X	Immature Ha	X	X	X	X	X	Total Planted Ha	X	X	X	X	X	FFB Tons	X	X	X	X	X	Yield /Ha	X	X	X	X	X	RM/mt FFB	X	X	X	X	X	RM//Ha	X	X	X	X	X		Activities		Activities	1	Merumput	9	Sanitasi pokok	2	Membaja	10	Sempadan & ukur	3	Parit	11	Menyulam	4	Jalan & jambatan	12	Penyeliaan am	5	Pemuliharaan tanah/air	13	Sanitasi pokok	6	Mencantas	14	Sempadan & ukur	7	Buruh	15	Penyeliaan	8	Pengangkutan	16	Peralatan	
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MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance												
4.6.2.2	<p>Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years.</p> <p>- Major compliance -</p>	<p>The replanting programs until 2025 were sighted for the estate. This program is reviewed once a year (latest being Jan 2021 and is incorporated in their annual financial budget. The replanting program until year 2025 is as follows: All figures in ha otherwise stated.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Keratong 11</td> <td>222.17</td> <td>245.03</td> <td>100.26</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	Estate	2021	2022	2023	2024	2025	Keratong 11	222.17	245.03	100.26	0	0	Complied
Estate	2021	2022	2023	2024	2025										
Keratong 11	222.17	245.03	100.26	0	0										
4.6.2.3	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment <p>- Major compliance -</p>	<p>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 was sighted.</p>	Complied												
4.6.2.4	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p> <p>- Major compliance -</p>	<p>The estate performance is recorded in the monthly progress report.</p> <ul style="list-style-type: none"> i. Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein. ii. The management also provides variance report on the performance and reviewed on a monthly basis. iii. The supervisory personnel maintained a daily cost for the field operations. <p>The meeting involving the Managers sits monthly with the Regional Zone Head for the performance review.</p>	Complied												
<p>Criterion 4.6.3: Transparent and fair price dealing</p>															

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	The pricing mechanism for the contractor are mentioned in the contract signed between FGV and contractor.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	On both Estates all contracts verified were fair, legal and transparent and agreed payments were made in timely manner. All contracts and purchases are documented i.e in the form of purchase orders, invoices, and contracts for the larger transaction. All documents are signed by both vendor and management.	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	The estates had informed its contractors regarding the need to follow the MSPO requirements through MSPO training/briefing. The latest session was carried out on 1/4/2021 in estate.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Sampled of the agreement with the contractor as below: Perniagaan Maju Bera; SPK 5300006608 dated 5/8/2020 & Wazer Jaya Enterprise; SPK 5300006806 dated 20/11/2020.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	There were no objections from management to accept MSPO approved auditors to verify assessments through a physical inspection where required and written in the addendum contract.	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 -	All works performed at the estates are checked and verified by the estates personnel before payment been made to the contractors. Verified records were for Perniagaan Maju Bera; SPK 5300006608 dated 5/8/2020 & Wazer Jaya Enterprise; SPK 5300006806 dated 20/11/2020.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.7 Principle 7: Development of new planting (Not Applicable because no new planting in Sampling estate)			
Criterion 4.7.1: High biodiversity value			
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	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 -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
Criterion 4.7.2: Peat Land			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	There is no peat soil or soil categorized as marginal or fragile soil in all estate visited. There was also no new planting in the estate	Not Applicable
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations.	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	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 -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
Criterion 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 -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	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 -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
Criterion 4.7.6: Customary land			
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites.	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	- 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 available. - Major compliance -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - Major compliance -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	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 -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	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 -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	FGV Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020) was developed. The policy has detailing the responsibility and compliance to the policy and FGV’s commitment to sustainability. Besides, Code of Business Conduct and Ethics (CoBCE) for Employees (Policy No.: FGV/GHR/POL/039 Rev. 4.0) was established which incorporated various aspect of committing to a code of ethical conduct and integrity and each of the employees need to read through the policy and accepted via online. The Supplier Code of Conduct was available in the company’s website (Doc. Version 001.05.2020) which outlined the business ethics& integrity for all the suppliers with FGV Holdings Berhad and all the contractors and suppliers have to sign on the SCOC. Keratong 3 POM has conducted briefing of CoBCE to the workers on 16/3/2021.	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 -	The established policy has emphasized on the commitment to comply with all applicable legal requirements, contribute to local community development, and environmental consideration with the objective of improving the milling and estate operation	Complied
Criterion 4.1.2 – Internal Audit			

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Internal Audit Procedure (Doc. No.: FGV/ML-1A/L2-Pr11, Rev. 0 dated 01/06/2016) was developed to ensure the internal audit is carried out for the implementation of RSPO, and MSPO. The internal audit will be carried out on yearly basis. Internal audit was planned as per the procedure.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	SOP refer to indicator 4.1.2.1. The last internal audit was carried out on 20-24/09/2021 by SCCD team. Corrective action plan was developed with action taken identified. Root cause was identified with corrective action was developed.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	As per record dated 28/10/2021, report made available for review in the management review meeting and recorded in the management review meeting minutes.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	The last management review was conducted on 28/10/2021. The management review had included internal and external sustainable palm oil audit results review and all pertinent agenda as per standard requirements. The status of the correction and preventive actions are being discuss and reviewed. The meeting was chaired by Mill Manager and attended by HODs. The minutes of the meeting and review presentation was sighted.	Complied
Criterion 4.1.4 – Continual Improvement			

Criterion / Indicator		Assessment Findings	Compliance
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	Continual improvement plan for the mill has been documented in the management review meeting minutes dated 10/9/2021. The plan was developed based on consideration of the social and environmental impact.	Complied
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 -	There is no new application of new technology implemented during the certification periods. The current practices continued and guide by Standard Operation Procedure (SOP). The Palm Oil Mill management will implement and monitor any new technologies being implemented and the training of other personnel.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	FGV has established SOP for information request from relevant stakeholders and documented in ' <i>Komunikasi, Penglibatan dan Rundingan</i> ' with Doc. No.: FGV/ML-1A/L2-Pr12 dated 01/06/2016. The objective of the SOP is to establish an effective system for communication between company and stakeholder. Briefing of the procedure was conducted on 26/11/2021 to the workers in Keratong 3 POM and 01/04/2021 in Keratong 11 estate Administrative Executive of Keratong 3 POM has been appointed as Communication and Social Officer to provide information and receive complaints from stakeholder. Role and responsibilities have been outlined in the appointment letter dated 2/1/2021 (04)4028/Ktg3/840A/RSP0/MSPO.	Complied

	Criterion / Indicator	Assessment Findings	Compliance
4.2.1.2	<p>The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>FGV has established SOP for information request from relevant stakeholders and documented in '<i>Komunikasi, Penglibatan dan Rundingan</i>' with Doc. No.: FGV/ML-1A/L2-Pr12 dated 01/06/2016. The objective of the SOP is to establish an effective system for communication between company and stakeholder.</p> <p>List of documents that made available upon request are as below:</p> <ul style="list-style-type: none"> • Minutes meeting • Complaint report • Land title • Safety and Health Plan • HCV report • Stakeholder list • SEIA assessment report and management plan • Policies and etc. <p>Keratong 3 POM has issued memo dated 02/01/2021 and displayed at the notice boards in the mill's premise and linesite to inform stakeholders regarding the publicly available documents that could be access by them.</p> <p>Management of Keratong 3 have provided a memo to all stakeholders dated 11/01/2021 stating all the publicly available documents in the estate, undersigned by the estate manager which was available for verification.</p>	Complied
<p>Criterion 4.2.2 – Transparent method of communication and consultation</p>			

Criterion / Indicator		Assessment Findings	Compliance
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	There was no physical stakeholder meeting conducted for Y2021 due to outbreak of COVID-19 pandemic. The management of Keratong 3 POM has approached to the stakeholders to brief them on the publicly available document that could be requested, prevention of fire usage and complaint procedure, company's policies on 10/3/2021 in Keratong 3 POM as per Letter (01)4028/ktg.3/840A/RSPO/2021. There was no issue received by the management from stakeholders.	Complied
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 -	Administrative Executive of Keratong 3 POM has been appointed as Communication and Social Officer to provide information and receive complaints from stakeholder. Role and responsibilities have been outlined in the appointment letter dated 2/1/2021 (04)4028/Ktg3/840A/RSPO/MSPO.	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 and estates have developed a stakeholder list that consisted of internal and external stakeholders such as contractors and suppliers, local communities, government authorities, buyers and etc. Estate has established List of Stakeholders where details of the stakeholders such as address, contact person and contact numbers are available in the stakeholder list. Date of last update for Keratong 11 Estate on 08/11/2021 and 02/01/2021 in Keratong 3 POM.	Complied
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance -	The mill has established an SOP on traceability stated in the following to provide guideline on delivery of FFB to the mill.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Manual Ladang Sawit Lestari section 8.0 Mengangkut BTS ke Kilang (MLSL (Ed.2) – Sec.4 (8.0), 1/6/2012). Therein describing documents among others maintained were: a) Nota Penghantaran BTS b) Slip Akuan Penerimaan (weighbridge ticket) c) Slip Grading d) Sijil Mutu BTS	
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.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	The office clerks Sdr Khamis Zaini (FFB Grader) and Sdri Norasimah Jasman (weighbridge clerk) as assigned to implement and maintain the traceability system as verified through an appointment letter dated 02/1/2021 issued by the Manager.	Complied

Criterion / Indicator		Assessment Findings	Compliance																																																																						
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	<p>Verification of the records and documents mentioned in 4.2.3.1 showed that the deliveries of FFB were well maintained. Crosschecking between the daily FFB delivery records and the transportation documents showed that the records were accurate and well maintained.</p> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>Prod</th> <th>Contract no</th> <th>WB no</th> <th>Buyer</th> <th>Mt</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2/11/21</td> <td>CPO</td> <td>T007256</td> <td>H01044</td> <td>DOP</td> <td>37.82</td> </tr> <tr> <td>2</td> <td>27/10/21</td> <td>CPK</td> <td>UT 06922</td> <td>L0218</td> <td>FGV Kernel</td> <td>46.24</td> </tr> <tr> <td>3</td> <td>28/10/21</td> <td>CPK</td> <td>R-6923L</td> <td>L0219</td> <td>FGV Kernel</td> <td>46.14</td> </tr> <tr> <td>4</td> <td>26/11/21</td> <td>CPO</td> <td>T07305</td> <td>H1069</td> <td>DOP</td> <td>41.86</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>Crop</th> <th>Contract no</th> <th>WB no</th> <th>Supplier</th> <th>Mt</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>29/11/21</td> <td>FFB</td> <td>S6057138</td> <td>537578</td> <td>B Mas Bina</td> <td>1.40</td> </tr> <tr> <td>2</td> <td>29/11/21</td> <td>FFB</td> <td>SKB</td> <td>034384</td> <td>K 05 E</td> <td>1.17</td> </tr> <tr> <td>3</td> <td>02/12/21</td> <td>FFB</td> <td>SKB</td> <td>014186</td> <td>K 04 E</td> <td>2.80</td> </tr> <tr> <td>4</td> <td>02/12/21</td> <td>FFB</td> <td>SKB</td> <td>07308</td> <td>K 11 E</td> <td>6.09</td> </tr> </tbody> </table>		Date	Prod	Contract no	WB no	Buyer	Mt	1	2/11/21	CPO	T007256	H01044	DOP	37.82	2	27/10/21	CPK	UT 06922	L0218	FGV Kernel	46.24	3	28/10/21	CPK	R-6923L	L0219	FGV Kernel	46.14	4	26/11/21	CPO	T07305	H1069	DOP	41.86		Date	Crop	Contract no	WB no	Supplier	Mt	1	29/11/21	FFB	S6057138	537578	B Mas Bina	1.40	2	29/11/21	FFB	SKB	034384	K 05 E	1.17	3	02/12/21	FFB	SKB	014186	K 04 E	2.80	4	02/12/21	FFB	SKB	07308	K 11 E	6.09	Complied
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4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	<p>A mechanism to ensure compliance to legal and other requirement has been documented in Manual Lestari established from the Head Office level.</p> <p>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.</p> <p>ii. Thereafter the estates and mill where applicable will be notified</p>	Complied																																																																						

Criterion / Indicator		Assessment Findings	Compliance																																										
		<p>via email on the changes/update of LORR for implementation.</p> <p>a) Licenses/permit viewed as complied by the mill for the legislative requirement among others viewed were as follows.</p> <table border="1"> <thead> <tr> <th></th> <th>License /permit</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MPOB license no 500-194-604000</td> <td>30/6/2022</td> </tr> <tr> <td>2</td> <td><i>Jabatan Alam Sekitar no JAS 600/3-2/1/23</i></td> <td>30/6/2022</td> </tr> <tr> <td>3</td> <td>Suruhanjaya Tenaga - Perpasangan</td> <td>05/7/2022</td> </tr> <tr> <td>4</td> <td>Meterology Corporation - B844688378</td> <td>05/10/2022</td> </tr> <tr> <td>5</td> <td>Lesen Perniagaan Maj Daerah Rompin</td> <td>31/12/2021</td> </tr> <tr> <td>6</td> <td>Back Pressure steam receiver PMT 10501</td> <td>04/6/2021</td> </tr> <tr> <td>7</td> <td>Horizontal Air Receiver PH PMT 3107</td> <td>04/6/2022</td> </tr> <tr> <td>8</td> <td>Steriliser no 1 PMT 45447</td> <td>04/6/2022</td> </tr> <tr> <td>9</td> <td>Steriliser no 3 PMT 45431</td> <td>04/6/2022</td> </tr> <tr> <td>10</td> <td>Boiler PH PMD 122</td> <td>04/6/2022</td> </tr> <tr> <td>11</td> <td>Air Compressor PMT 4984</td> <td>04/6/2022</td> </tr> <tr> <td>12</td> <td>Crane PMA 12205</td> <td>04/6/2022</td> </tr> <tr> <td>13</td> <td>Permit Sumber Air - 094/012101000</td> <td>31/12/21</td> </tr> </tbody> </table>		License /permit	Validity	1	MPOB license no 500-194-604000	30/6/2022	2	<i>Jabatan Alam Sekitar no JAS 600/3-2/1/23</i>	30/6/2022	3	Suruhanjaya Tenaga - Perpasangan	05/7/2022	4	Meterology Corporation - B844688378	05/10/2022	5	Lesen Perniagaan Maj Daerah Rompin	31/12/2021	6	Back Pressure steam receiver PMT 10501	04/6/2021	7	Horizontal Air Receiver PH PMT 3107	04/6/2022	8	Steriliser no 1 PMT 45447	04/6/2022	9	Steriliser no 3 PMT 45431	04/6/2022	10	Boiler PH PMD 122	04/6/2022	11	Air Compressor PMT 4984	04/6/2022	12	Crane PMA 12205	04/6/2022	13	Permit Sumber Air - 094/012101000	31/12/21	
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4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register.	The documented legal register with written information on legal requirements applicable to their operation. The record titled " <i>Senarai Rujukan Akta Dan Berdaftar Perundangan</i> " issued by the	Complied																																										

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>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:</p> <ul style="list-style-type: none"> • Pesticides Act 1974 and Regulations • Environmental Quality Act and Regulations 1974 • Factories and Machinery Act and Regulations, 1967 • Weights and Measures Regulations 1981 • Electricity Regulations 1994 • Immigration Act 1959 • Occupational Safety and Health Act 1994 • Employment Act 1955 • Industrial Relations Act 1967 • Children and Young Persons (Employment) Act 1966 • MPOB Regulations (Licensing) 2005, EQ (Prescribed Premise) (Crude Palm Oil) Regulations 1977 • Industrial Code of Practice for Confined Space 2010 • MPOB licensing Regulation 2005 • Akta Polis 1967 • Akta Pencegahan Dan Pengawalan Penyakit Berjangkit 1988 • Akta Std Min Perumahan Dan Kemudahan Pekerja 2019 (Pindaan) • Perintah Gaji Minima 2020 	
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.	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	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	assisted via the Region Office and through personnel from SCCD during the site visits and audits.	
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 -	FGV have centralised system for tracking any changes in the law as per "Panduan: Sistem Pengesanan Perubahan Undang - undang" dated 23/6/2017, Version:04. a) 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. b) This correspondence was sighted via an email issued from Head Office for the operating units to update and comply where applicable. c) The PIC for legal compliance is En Muhammad Helmi Jaafar Assistant Manager via letter dated 02/01/2021 issued by the Manager.	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	Keratong POM has the legal land use rights and the land is belong to FGV Palm Industries Sdn Bhd. This has verified through the land title # 3693, Lot No.: PT 8122 for the usage of palm oil factory. This has confirmed with the local communities that no land dispute was reported.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	Keratong POM has the legal land use rights and the land is belong to FGV Palm Industries Sdn Bhd. This has verified through the land title # 3693, Lot No.: PT 8122 for the usage of palm oil factory.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The mill is located in the host estate FELDA Keratong 3. It is seperated by means of fencing and effluent. The mill operates under land title detailed as follows: a) Hak milik 03/PN - 0009860 - total area 61860 cu meter. b) Lot No 0013469 /lot 13469 - Mukim Keratong.	Complied
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is not land dispute recorded. This verified as per stakeholder meeting record dated 26/8/2020 and complaint/ grievances record.	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land or negotiated agreements at all the sampled estates.	Not applicable
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	There is no customary land or negotiated agreements at all the sampled estates.	Not applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	There is no customary land or negotiated agreements at all the sampled estates.	Not applicable
4.4 Principle 4: Social responsibility, health, safety and employment condition			

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	<p>Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.</p> <p>- Minor compliance -</p>	<p>SIA was conducted on Oct 2021(Revision 2) for Keratong 3 POM by the Certification & Due Diligence Sustainability & Environment Department. The methodology of the assessment was through sampling of stakeholders to be interviewed. Positive and negative impacts were identified and incorporated into the Management Plan.</p> <p>Social Management Plan was developed in Keratong 3 POM on 28/11/2021. The impact/ issue raised during assessment were recorded in the management plan. For e.g.:</p> <ol style="list-style-type: none"> Impact: The price for food in canteen was not available and fluctuate Actions to be taken: To ensure the canteen put the price Status: verified on 10/1/2021 Impact: Process to renew passport and permit slow. Actions to be taken: To submit the passport 2 months before the expiry date. Status: Seen the list of permits FW04830069 that expired on Dec 2021 and the management has submitted to HQ for renewal on 22/11/2021. Seen the Borang Pengesahan Penyambungan Permit/ Penamatan Kontrak TKL. 	Complied
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>FGV has established SOP for information request from relevant stakeholders and documented in '<i>Komunikasi, Penglibatan dan Rundingan</i>' with Doc. No.: FGV/ML-1A/L2-Pr12 dated 01/06/2016.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		The objective of the SOP is to establish an effective system for communication between company and stakeholder. Briefing of the procedure was conducted on 26/11/2021 to the workers in FGV Keratong 3 POM.	
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 -	Complaint and Request Logbook was implemented in FGV Keratong 3 POM implemented Complaint and Grievance Form to record any complaints. Sampled of internal complaint as below: Complaint No.: Felda Keratong 3 – dated 26/06/2021 Issue: Grader post malfunction Status: The management has appointed contractor to carry out the repair work and seen the Work Order dated 8/7/2021 and invoice# INV1040 dated 1/06/2021 SPK:3301488122. The worker has acknowledged after the work has been completed.	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 -	There was a suggestion/ complaint box in front of the office with Complaint & Grievance Form was available. The stakeholders and workers have access to the form to lodge complaint if any.	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 -	FGV has established SOP for " <i>Menangani Aduan dan Rugutan</i> " with Doc. No.: FGV/ML-1A/L2-Pr13 dated 01/04/2019. The procedure is to provide a system for the internal and external stakeholders to lodge complaint and grievances to the management. The complaints will be solved in 14 days (first stage), 14 days (second stage). The complaint has to be resolved within 2 months from the date of discussion in third stage if the issue needs to be escalated to <i>Wilayah Office</i> . Any issues that can be resolved within the operating unit, it has to be closed within 14 days.	Complied

Criterion / Indicator		Assessment Findings	Compliance																
		Besides, grievance reporting channels were published in the company's website, https://www.fgvholdings.com/whistleblowing/ . The channels of reporting such as through letter, email, in person or Hotline Toll Free call. The whistleblowing e-form was available in https://www.fgvholdings.com/sustainability/grievance/# for the stakeholders to report a grievance. Briefing of the procedure was conducted on 1/4/2021 to the workers in Keratong 3 POM.																	
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 -	Records of Grievance & Complaint Book and Request Form for Housing Defect (Borang RK 3) were available for the past 24 months.	Complied																
Criterion 4.4.3: Commitment to contribute to local sustainable development																			
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance -	<p>The mill made contributions to the local development among others:</p> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>Details</th> <th>Value RM</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>11/06/21</td> <td>Sumbangan Tabung Palestin</td> <td>RM 431.30</td> </tr> <tr> <td>2</td> <td>29/01/21</td> <td>PKP food Donation</td> <td>RM 4200</td> </tr> <tr> <td>3</td> <td>19/04/21</td> <td>Dates (Kurma) contribution</td> <td>RM 1500</td> </tr> </tbody> </table> <p>The mill provided food basket to all the workers that worth RM 50 during Quarantine for COVID-19 issue. Seen the letter (04)4028/Krtg.3/840A/Sumbangan dated 18/8/2021. Seen the record of recipients of the food baskets. All corresponding documents were sighted and verified.</p>		Date	Details	Value RM	1	11/06/21	Sumbangan Tabung Palestin	RM 431.30	2	29/01/21	PKP food Donation	RM 4200	3	19/04/21	Dates (Kurma) contribution	RM 1500	Complied
	Date	Details	Value RM																
1	11/06/21	Sumbangan Tabung Palestin	RM 431.30																
2	29/01/21	PKP food Donation	RM 4200																
3	19/04/21	Dates (Kurma) contribution	RM 1500																
Criterion 4.4.4: Employees safety and health																			

Criterion / Indicator		Assessment Findings	Compliance																												
4.4.4.1	<p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>The Group Occupational Safety & Health Management Policy had been established and implemented. There are 3 levels of safety policy engaged by the Mill.</p> <p>a) Pernyataan Polisi Kesehatan Dan Keselamatan signed by CEO dated 05/11/2021</p> <p>b) Another level of the policy is issued by the CEO of Felda Palm Industries on 01/01/2021.</p> <p>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.</p>	Complied																												
4.4.4.2	<p>The occupational safety and health plan should cover the following:</p> <p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risk of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:</p> <p>i. All employees involved are adequately trained on safe working practices;</p> <p>ii. All precautions attached to products should be properly observed and applied;</p> <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as</p>	<p>a) The Policy has been established with details elaborated in 4.4.4.1 above.</p> <p>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:</p> <table border="1"> <thead> <tr> <th></th> <th>Areas/Activities</th> <th></th> <th>Areas /Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Weighbridge/Ramp</td> <td>9</td> <td>Engine Room</td> </tr> <tr> <td>2</td> <td>Fruit Handling</td> <td>10</td> <td>Product storage/Dispatch</td> </tr> <tr> <td>3</td> <td>Continuous sterilizer</td> <td>11</td> <td>Laboratory</td> </tr> <tr> <td>4</td> <td>Threshing</td> <td>12</td> <td>Water treatment</td> </tr> <tr> <td>5</td> <td>Clarification/ Oil Room</td> <td>13</td> <td>Effluent Treatment Pond</td> </tr> <tr> <td>6</td> <td>Boiler House</td> <td>14</td> <td>Office</td> </tr> </tbody> </table>		Areas/Activities		Areas /Activities	1	Weighbridge/Ramp	9	Engine Room	2	Fruit Handling	10	Product storage/Dispatch	3	Continuous sterilizer	11	Laboratory	4	Threshing	12	Water treatment	5	Clarification/ Oil Room	13	Effluent Treatment Pond	6	Boiler House	14	Office	Complied
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Criterion / Indicator		Assessment Findings				Compliance
<p>identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	7	Electrical	15	workshop		
	8	Working at height	16	General Mill Work		
	<p>c) Training for employees are provided. The training includes for the employees handling chemicals and other safe working procedures. Details of the training organised as shown in 4.4.6.1.</p> <p>d) The mill issued PPE to all its employees. The common PPE provided are safety boots (2x/year) and safety helmets and cotton gloves. Other specified PPE i.e. are issued for designated type of work such as harness (working at height), leather gloves for the cage handlers and workshop personnel, ear plug for employees working at high noise density etc. Sighted selective issuance for the following:</p>					
		Name	PPE	Date		
	1	Firdaus Rashid	Safety shoes	26/6/21		
	2	Sazali Ibrahim	Safety shoes	18/1/20		
	3	Idham	Safety shoes	01/06/21		
	4	Md Fauzi Ishak	Cotton gloves	05/11/20		
	5	Md Zubir	Cotton gloves	19/5/21		
	6	Md Shafiz Daniel	Safety shoes	18/12/20		
7	Jasman Natiran	Cotton gloves	19/6/21			
8	Kamaruzaman	Leather hand glove	18/7/21			
9	Md Razali Karim	Leather hand glove	23/11/21			
<p>e) SOP of handling of chemicals is available in Manual and Prosedur Kerja Selamat - Pengendalian Bahan Kimia ref FPI-PK-036 dated 14/7/10 and Manual Operasi Kilang Sawit.</p>						

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																		
		<p>Therein is shown requirement & selection of chemicals, assessment of chemicals hazards, selection of supplier and transportation of chemicals storage and handling.</p> <p>f) The management appointed the Mill Manager as the Chairman for the ESH committee. The appointment was signed by the Head Zone via letter dated 26/01/2021. Communications on safety are made through safety meeting /site supervision/dialogue/briefing during the weekly muster.</p> <p>g) The safety meeting was held 3 monthly having a total of 4 meetings in a year. The dates of meeting held in 2020/21 were sighted and verified below:</p> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>Attendee</th> <th></th> <th>Date</th> <th>Attendee</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>24/9/21</td> <td>14</td> <td>3</td> <td>10/2/21</td> <td>10</td> </tr> <tr> <td>2</td> <td>12/5/21</td> <td>10</td> <td>4</td> <td>07/12/20</td> <td>11</td> </tr> </tbody> </table> <p>The agenda discussed among others as follows:</p> <ol style="list-style-type: none"> 1. Prestasi keselamatan, kesehatan 2. Laporan Kemalangan/NEMSO 3. Laporan Pemeriksaan Keselamatan Stesen 4. Laporan audit QOHSE 5. PPE inspection/CHRA 6. Legal compliance 7. Latihan & Program keselamatan 8. Machinery Inspection 9. Environmental Issues and Compliance Status 10. Other matters 		Date	Attendee		Date	Attendee	1	24/9/21	14	3	10/2/21	10	2	12/5/21	10	4	07/12/20	11	
	Date	Attendee		Date	Attendee																
1	24/9/21	14	3	10/2/21	10																
2	12/5/21	10	4	07/12/20	11																

Criterion / Indicator		Assessment Findings	Compliance										
		<p>h) Accident and emergency procedures are available. There is a formation of ERP Team & 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.</p> <p>i) The first aid training has been given to staff and workers dated 10/2/2021. The record was available for review.</p> <p>j) Records of all accidents are kept. Accident incidences are reviewed during safety meetings. Accidents incidences for 2020 were recorded below.</p> <table border="1"> <thead> <tr> <th></th> <th>Cases</th> <th>LTI</th> <th>Non LTI</th> <th>JKKP Submission</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>3</td> <td>170</td> <td>0</td> <td>24/01/2021</td> </tr> </tbody> </table> <p>An incidence occurred on 07/3/20 whereby a steriliser operator slipped his RHS ankle at workplace and was given a 120 MC. JKKP 6 form together with the investigation was submitted to DOSH on 12/3/20. Core factor identified as floor level variation at cantilever and rail track. Most of accidents are related to maintenance team while performing repair work at process stations. Investigations are made where required JKKP 6 were submitted to DOSH. HIRARC was reviewed accordingly.</p>		Cases	LTI	Non LTI	JKKP Submission	1	3	170	0	24/01/2021	
	Cases	LTI	Non LTI	JKKP Submission									
1	3	170	0	24/01/2021									
Criterion 4.4.5: Employment conditions													
4.4.5.1	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 17/11/2020 where the company	Complied										

Criterion / Indicator		Assessment Findings	Compliance
	shall be signed by the top management and communicated to the employees. - Major compliance -	committed to respecting human rights by upholding international human rights principles and standards as encapsulated in the Universal Declaration of Human Rights (UDHR), and other applicable international human rights treaties, subject to the laws and regulations of the countries and territories in which FGV Group operates. In fulfilling its responsibility to respect human rights, FGV Group is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs). Briefing of the policy was conducted on 1/4/2021 in Keratong 11 Estate and 04/05/2021 in Keratong 3 POM.	
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 -	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 29/05/2019 where all employees and workers shall receive equal treatment based on their relevant merits and competency regardless of gender, race, nationality, religion, age, physical condition, and marital status, reproductive rights of women, union membership/ affiliation/ employment status, or political affiliation. Briefing of the policy was conducted on 11/1/2021 to all the external stakeholders such as FFB suppliers, local communities and government authorities. Besides, briefing to the workers was conducted on 01/04/2021 in Keratong 3 POM. Interviewed with the workers confirmed that the management treated all the workers equally.	Complied
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 -	Total 10 workers' payslips and employment contracts were sampled and found that the workers were paid according to the company's policy, Collective Agreement which valid from 01/01/2019 to 31/12/2021 and legal requirements.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>Reviewed total 5 payslips and employment contract of the contractor's workers (Sorter) from Tinta Bumi Enterprise found that they have been paid according to the legal requirements.</p>	Complied
4.4.5.5	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>Human Resources Management System (HRMS) was implemented where the full name, gender, date of birth, date of entry, years of service, position and wages were recorded in the system.</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>All the workers employed in the mill are local and they have been signed on the offer letter. All the terms and conditions are referring to the Collective Agreement signed between FGV Palm Industries Sdn Bhd and Kesatuan Pekerja-pekerja FGV Palm Industries Sdn Bhd Semenanjung which valid from 01/01/2019 to 31/12/2021.</p>	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p>- Major compliance -</p>	<p>Keratong 3 POM has implemented "Punch Card" system to record the working hours and overtime for all the workers included the contractor's workers (sorters). The data was manually transferred from punch card into Borang Permohonan Kerja Lebih Masa.</p>	Complied
4.4.5.8	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p>- Major compliance -</p>	<p>Keratong 3 POM has implemented "Punch Card" system to record the working hours and overtime for all the workers included the contractor's workers (sorters). The overtime was paid accordingly as verified through the payslips. No overtime has exceeded the allowable limit of 104 hours.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Wages and overtime payment were clearly indicated in the payslip and all the payment was according to the legal requirements and Collective Agreement.	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 development, medical care provisions and improvement of social surroundings. - Minor compliance -	The management has subsidized the cost of medical care (outpatient) of total RM 5000 per year per family, RM 4 for water bill per person (max RM 15) and RM 6 for electricity bill. Other facilities such as mosque and field were available for the workers.	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	All workers are provided with housing facilities that furnish with sanitation facilities, water supplies, electricity and amenities such as praying house. Water and electricity are connected to the national supply and grid. Water and electricity usage are subsidized by the company and these conditions are stated in the collective agreement. Interview with workers confirms that there is no issue related to the payment of water and electricity.	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 -	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 29/05/2019 where the company does not tolerate any form of sexual harassment violence and abuse. Briefing to the workers was conducted on 01/09/2020 in Keratong 3 POM.	Complied
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	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 29/05/2019 where FGV commits to respect employees' and workers' right to freedom of movement, fair working hours, freedom of association and right to decent living condition. FGV respect the rights of all its employees and workers to join and form association, and to bargain collectively. Briefing to	Complied

Criterion / Indicator		Assessment Findings	Compliance																				
	should not be discriminated against or suffer repercussions. - Major compliance -	the workers was conducted on 01/04/2021 in Keratong 3 POM. Latest meeting conducted on March 2021 in Keratong 3 POM.																					
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 -	FGV has developed Group Sustainability Policy (Policy No.: FGV/SED/POL/001 dated 29/05/2019 where the company commits to eliminate any form of child labour and this has stated in the Supplier Code of Conduct which signed by every suppliers and contractors that engaged by the company. The minimum age of employment is 18 years old. Document reviewed on the master list of employees and the contractor's workers found that no child labour sighted.	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: <table border="1" data-bbox="1093 1129 1865 1398"> <thead> <tr> <th></th> <th>Subjects</th> <th></th> <th>Subjects</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>OSH Act & regulations 1994</td> <td>10</td> <td>Water treatment</td> </tr> <tr> <td>2</td> <td>Environmental Quality Act 1974</td> <td>11</td> <td>HCV & Biodiversity training</td> </tr> <tr> <td>3</td> <td>USECHH 2000/HIRARC</td> <td>12</td> <td>NADOPOD/HIRARC</td> </tr> <tr> <td>4</td> <td>OSH Committee & function</td> <td>13</td> <td>5S /LOTO</td> </tr> </tbody> </table>		Subjects		Subjects	1	OSH Act & regulations 1994	10	Water treatment	2	Environmental Quality Act 1974	11	HCV & Biodiversity training	3	USECHH 2000/HIRARC	12	NADOPOD/HIRARC	4	OSH Committee & function	13	5S /LOTO	Complied
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MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings				Compliance
		5	Workplace inspection	14	Chemical management	
		6	First Aid	15	Hearing conservation	
		7	SW compliance	16	Safe working procedure	
		8	RSPO/MSPO/SCCS	17	Water treatment Plant	
		9	Working at height	18	Environ Management	
		Records of training for Keratong 3 POM are shown below.				
			Date	Subject	Attendee	
		1	12/3/21	Mill Boiler SOP	4	
		2	30/3/21	FFB Quality - Supplier	50	
		3	17/09/21	SW management	Entire	
		4	14/2/21	Safety Policy awareness	Entire	
		5	11/1/21	Environmental Policy	Entire	
		6	01/9/21	SOP at workplace -Induction	1	
		7	23/2/21	Confined space SOP	20	
		8	10/2/21	First Aid	Entire	
		9	08/1/21	Internal audit procedure	7	
		10	04/6/21	Working at Height	11	
		11	23/2/21	SDS understanding	6	
		12	06/2/21	Complaint /Gender Rights	Entire	
		13	27/3/21	Environmental awareness	12	
		14	16/4/21	PPE adherence	Entire	
		15	23/4/21	Operation SOP	10	
		16	05/3/21	Housing hygiene	Entire	
		17	10/2/21	RC - Dialogue with employee	Entire	
		18	26/4/21	Raw water supply - briefing	9	
		19	20/2/21	MSPO / RSPO - Contractor	4	
		20	07/1/21	Workshop Operations	15	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings				Compliance
		21	03/1/21	COVID-19 - PKP adherence	Entire	
		22	05/1/21	Contractors - safety briefing	9	
		23	01/11/21	Hearing conservation	entire	
		24	23/2/21	Fire Drill	Entire	
		25	09/4/21	Mill Inspection – Briefing	Entire	
		26	25/11/21	Policy Awareness	Entire	
		27	01/4/21	Safety campaign	Entire	
		28	21/10/21	MSPO/RSPO SCC	8	
		29	16/3/21	Whistle blowing Policy	Entire	
		30	01/11/21	Chemical handling	13	
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>The training needs for the mill 2020/21 training program has been established. The details of the training needs include categories of stations, subjects, and employees’ group.</p> <p>Included in this program are subjects related to environment e.g. environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training, machine handling, mill stations operations, control of process parameters, workshop management. etc. The compilation from the approved training needs is later transferred to the formation of the training program.</p>				Complied
4.4.6.3	<p>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>This is in compliance and detailed in 4.4.6.1 & 4.4.6.2 above. Training program are made on annual basis. In addition, it is subject for a review during the financial year should need arises.</p>				Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services						

Criterion / Indicator		Assessment Findings	Compliance						
Criterion 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 an Environmental Policy titled Pernyataan Polisi Alam Sekitar FGV Holdings Berhad for the mill issued and endorsed in 05/11/2021 by the Ketua Pegawai Eksekutif Kumpulan of FGV. Therein the policy among others stated that the Company is committed: <ul style="list-style-type: none"> To protecting the environment and conserving biodiversity through sustainable development Abide by all legislative requirement Manages environmental risk and providing reasonable resources to minimise risk and pollution to environment Continuing and improving efficiency towards enhancing environment 	Complied						
4.5.1.2	The environmental management plan shall cover the following: <ul style="list-style-type: none"> a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations - Major compliance -	The mill has established environmental improvement plan and documented in Environmental Improvement Plan 2020/2021. Latest review was conducted on 30/09/2020. The plan consists of improvement plans as below among others: <table border="1" data-bbox="1086 1082 1865 1378"> <thead> <tr> <th>Environmental Impact</th> <th>Improvements</th> </tr> </thead> <tbody> <tr> <td>Emission of dust/ashes particles released to the air.</td> <td>To build electrostatic precipitator (ESP) for trap dust/ashes particles.</td> </tr> <tr> <td>Emission of dark smoke</td> <td>To build electrostatic precipitator (ESP) for trap dust/ashes particles. To install Thermal deaerator for boiler water supply. This to</td> </tr> </tbody> </table>	Environmental Impact	Improvements	Emission of dust/ashes particles released to the air.	To build electrostatic precipitator (ESP) for trap dust/ashes particles.	Emission of dark smoke	To build electrostatic precipitator (ESP) for trap dust/ashes particles. To install Thermal deaerator for boiler water supply. This to	Complied
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Criterion / Indicator		Assessment Findings		Compliance								
			reduce the usage of solid fuel thus reducing smoke emission. To install Biogas Bo.3 and No.4. this to reduce the usage of solid fuel thus reducing smoke emission.									
		Collapse of retention bund due to erosion	To repair the bund, complete with RC piling.									
		Discharge of effluent into furrows over 100ppm BOD (license Limit)	To upgrade ETP with biogas Reactor and Polishing Plant. To install sludge dewatering system for online desludging. This will improve the effluent retention time.									
		Scheduled Waste Management	To conduct refresher training on scheduled waste.									
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 -	The mill monitors aspects and impacts among others the following activities This plan is available and similar to the reduction of pollution and emission. Mainly the areas relating to significant impact to the environment and the effort implemented are summarised below.		Complied								
			<table border="1"> <thead> <tr> <th></th> <th>Environmental concerns</th> <th>Solution Procedure/Action Plan</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water Quality</td> <td>Continuous monitoring water quality at identified points of river for detection of quality/pollution Analysis made at certified laboratory</td> <td>River, Water Treatment Plant</td> </tr> </tbody> </table>		Environmental concerns	Solution Procedure/Action Plan	Location	1	Water Quality	Continuous monitoring water quality at identified points of river for detection of quality/pollution Analysis made at certified laboratory	River, Water Treatment Plant	
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Criterion / Indicator		Assessment Findings			Compliance	
			Advisory/guidance from Health Ministry			
		2	Air Quality	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		Boiler operation mill complex
		3	Scheduled waste	Scheduled wastes are managed in accordance with the regulatory requirements.		Source of generation / store
		Records of periodical reporting of the listed issues were available. These were the evidence which showed that the plans been monitored. The plans were reviewed annually during the Management review / ESH meeting where environmental issues were discussed.				
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Details are included in the continual improvement plan. Details as summarised below:			Complied	
			Projects	Details		
		1	Operation	Transfer 1 unit decanter form Keratong 3 POM Feb 2022 at RM 30K. Reduce BOD before treatment in ETP.		
		2	Environmental	Expand width and height of Effluent pond bund 12 units completion iin Mac 2022 at RM 62K. This is to improve retention with possible overflowing.		

Criterion / Indicator		Assessment Findings			Compliance
		3	Environmental	Effluent pond desludging 3 units completion in Dec 2021 at RM70K.	
		4	Environmental	VORSEP installation in Dec 2018 to improve dust particulate RM 2M.	
		5	Environmental	Shredded plant EFB completion in April 2019 at RM 2.2M sold at external buyer.	
		6	Environmental	Bio-Polishing Plant in 2022. Reduce BOD in final discharge.	
		7	Environmental	Surface aerator in Dec 2021 at RM 20K to reduce BOD final discharge.	
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 available and updated on yearly basis or revised as per the management requirement. Included in this programme are subjects related to environment among others listed below: <ul style="list-style-type: none"> • Environmental Quality Act & Regulations 1974 • Environmental, safety & health policy • ERP Oil /chemical spill • Scheduled waste management • Environmental responsibility, HCV & Biodiversity training 			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 -	The environmental issues are discussed in a meeting by the EPMC (Environmental Performance Monitoring Committee) Meeting is held 4x /year. The agenda discussed among others as follows: <ol style="list-style-type: none"> a) Matters arising b) Performance of environment compliance c) Report on environmental pollution d) Self-compliance checklist performance 			Complied

Criterion / Indicator		Assessment Findings	Compliance
		e) Effluent treatment /clean air / scheduled waste f) Audit report on ISO 14001 EMS / RSPO/ MSPO g) Domestic waste issues In addition, environmental issues were also discussed during the quarterly ESH meetings and also briefed during the weekly muster.	
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period - Major compliance -	The 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: <ul style="list-style-type: none"> • Educate workers on fuel saving practice • 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; <ul style="list-style-type: none"> • All the diesel used (non-renewable) for the mill operations • Fibre/shell used (renewable) 	Complied

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																																												
		<p>The diesel consumption/mt FFB in 2020/21 is shown below. Baseline is 0.70L/mt FFB</p> <table border="1"> <thead> <tr> <th>2021</th> <th>FFB processed</th> <th>Diesel /L</th> <th>Diesel /FFB</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>19500</td> <td>10280</td> <td>0.53</td> </tr> <tr> <td>Feb</td> <td>11240</td> <td>5660</td> <td>0.50</td> </tr> <tr> <td>Mac</td> <td>16650</td> <td>4310</td> <td>0.26</td> </tr> <tr> <td>April</td> <td>22510</td> <td>7799</td> <td>0.35</td> </tr> <tr> <td>May</td> <td>22020</td> <td>5116</td> <td>0.23</td> </tr> <tr> <td>June</td> <td>25800</td> <td>6217</td> <td>0.24</td> </tr> <tr> <td>July</td> <td>18930</td> <td>6157</td> <td>0.23</td> </tr> <tr> <td>Aug</td> <td>11740</td> <td>4270</td> <td>0.36</td> </tr> <tr> <td>Sept</td> <td>23140</td> <td>6386</td> <td>0.28</td> </tr> <tr> <td>Oct</td> <td>16900</td> <td>7027</td> <td>0.42</td> </tr> </tbody> </table> <p>Factors relating to weather condition, FFB ramp balances, vehicles breakdown, gen-set breakdown are the attributes to the variation in the Diesel/FFB ratio performance.</p>	2021	FFB processed	Diesel /L	Diesel /FFB	Jan	19500	10280	0.53	Feb	11240	5660	0.50	Mac	16650	4310	0.26	April	22510	7799	0.35	May	22020	5116	0.23	June	25800	6217	0.24	July	18930	6157	0.23	Aug	11740	4270	0.36	Sept	23140	6386	0.28	Oct	16900	7027	0.42	
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4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	The fibre and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fibre are delivered to estates for multi purposes or sold to outside buyers. EFB is used in the estates for mulching.	Complied																																												
Criterion 4.5.3: Waste management and disposal																																															
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Keratong 3 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	Complied																																												

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																														
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4.5.3.2	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p>- Major compliance -</p>	<p>Keratong 3 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:</p> <table border="1"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>Land</td> <td>Scheduled waste, domestic waste and industrial/process waste</td> </tr> </tbody> </table> <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2021 reviewed annually. The waste generated from the mill/estates operations as shown below:</p> <table border="1"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> </tbody> </table>			Receptor	Sources	1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG	2	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	Land	Scheduled waste, domestic waste and industrial/process waste		Type of waste	Details	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	Minor Noncompliance
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		However, during the site visit to the mill compound /processing plant it was observed that presence of scrap material/maintenance parts and material were evident without proper storage and segregation. <i>As such a Minor Noncompliance is raised.</i>														
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 -	FGV Keratong 3 POM had established SOP for chemical handling. The SOP of handling of chemicals 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														
				Complied												

Criterion / Indicator		Assessment Findings					Compliance
		The scheduled waste is disposed to Kualiti Alam Sdn Bhd registered with DOE.					
		Mill	Date	SW 305	SW 409	SW 410	SW306
		KPOM	28/9/20	0.640	-	0.220	-
			30/1/19	0.560	-	-	-
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	Domestic waste for the mill and housing complex are disposed at FELDA Keratong 3 landfill collected 2/3 x week.					Complied
Criterion 4.5.4: Reduction of pollution and emission							
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	The polluting activities are identified and documented in the Environmental Aspect & Impact Identification. From the EAI, it will be evaluated for the impact and any impact will be included in the management plan. The evaluation is documented in the Environmental Impact Evaluation. All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2021 reviewed annually. The waste generated from the mill/estates operations as shown below:					Complied
			Type of waste	Details			
		1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries			
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4.5.4.2	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p>	<p>The action plan to reduce the pollution is tabled below.</p> <table border="1"> <thead> <tr> <th></th> <th>Environmental Issues</th> <th>Management/Action Plan</th> <th>Time frame</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Boiler- Black smoke</td> <td>To monitor the condition of dust cyclone every 3 months To carry out boiler furnace cleaning every week</td> <td>AMM</td> </tr> <tr> <td>2</td> <td>Effluent-Odor & gases</td> <td>To maintain proper feeding into digestion process of effluent to prevent severe and unpleasant odor</td> <td>AMM</td> </tr> </tbody> </table>				Environmental Issues	Management/Action Plan	Time frame	1	Boiler- Black smoke	To monitor the condition of dust cyclone every 3 months To carry out boiler furnace cleaning every week	AMM	2	Effluent-Odor & gases	To maintain proper feeding into digestion process of effluent to prevent severe and unpleasant odor	AMM	Complied				
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Criterion / Indicator		Assessment Findings			Compliance																									
		3	Vehicles/Lorries- Leakage of lubricant /diesel	Ensure maintenance schedule to be strictly followed To place all lubricant oil drum on metal trays. Vehicles awaiting entry into the mill to be switched off	AMM																									
		4	Domestic waste - odor and environmental pollution	Only organic waste to be disposed. NO burning and NIL disposal of empty chemicals containers into landfill	AMM																									
		All efforts and action plan for the identified pollutants and emission above at current is adequate to comply with the requirement. All identified issues have significant impacts to the environment.																												
4.5.4.3	<p>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.</p> <p>- Major compliance -</p>	<p>Palm oil mill effluent (POME) is treated to ensure compliance with the DOE standards. Interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements.</p> <p>a) No overflow was observed, and flow meter reading was recorded daily. Submission to DOE are made through Borang Penyata Suku Tahunan</p> <table border="1"> <thead> <tr> <th>Sample date</th> <th>Std</th> <th>13/7/21</th> <th>03/8/21</th> <th>7/9/21</th> </tr> </thead> <tbody> <tr> <td>PH</td> <td>5.-9.</td> <td>8.73</td> <td>8.22</td> <td>8.43</td> </tr> <tr> <td>BOD</td> <td>100</td> <td>89</td> <td>84</td> <td>62</td> </tr> <tr> <td>COD</td> <td>-</td> <td>497</td> <td>754</td> <td>352</td> </tr> <tr> <td>Total solids</td> <td>-</td> <td>2210</td> <td>2872</td> <td>2486</td> </tr> </tbody> </table>			Sample date	Std	13/7/21	03/8/21	7/9/21	PH	5.-9.	8.73	8.22	8.43	BOD	100	89	84	62	COD	-	497	754	352	Total solids	-	2210	2872	2486	Complied
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MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings					Compliance																				
		S Solids	200	182	273	260																					
		Oil & grease	5.0	6.00	3.00	2.00																					
		A Nitrogen	20	28	37	33																					
		Total N	200	39	44	46																					
		b) The results from final discharge were compliance within the DOE parameter limit.																									
Criterion 4.5.5: Natural water resources																											
4.5.5.1	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>The mill water management plan has been established and reviewed in Jan 2021. Among others the plan therein emphasized;</p> <ul style="list-style-type: none"> a) Rain water harvesting for cleaning purposes b) Water from the reservoir/catchment for the mill operations c) Continual training for workers on water efficiency consumption d) Desilting of water reservoir to retain the reservoir optimal capacity <table border="1"> <thead> <tr> <th></th> <th>Source</th> <th>Activity</th> <th>Threat</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reservoir/pond/PAIP/Rain</td> <td>Chemical mixing</td> <td>Pollution Draught Wastage</td> <td>Enforcement of buffer zone as non-spraying activities.</td> </tr> <tr> <td>2</td> <td></td> <td>General Upkeep</td> <td>Pollution Draught Wastage</td> <td>Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.</td> </tr> <tr> <td>3</td> <td></td> <td>Line site</td> <td>Pollution Draught Wastage</td> <td>Every house is supplied with containers.</td> </tr> </tbody> </table>						Source	Activity	Threat	Action Plan	1	Reservoir/pond/PAIP/Rain	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer zone as non-spraying activities.	2		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.	Complied
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MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings						Compliance																																																							
		4			Water pollution		<p>To schedule water supply to avoid wastage. Awareness on water usage efficiency. Outsource from neighboring estates.</p> <p>Prohibit workers from activities at water source Drinking water analysis. Monitor condition of septic tank Adhere SW management procedure to avoid pollution caused by SW.</p>																																																								
		<p>b) Water sampling at Sg Kemabai is made annually with recent results shown below. There were closure of estates operations during the MCO period lapsing the 2020 sampling.</p> <table border="1"> <thead> <tr> <th></th> <th>K11E</th> <th></th> <th colspan="2">18/11/21</th> <th colspan="2">14/8/19</th> </tr> <tr> <th></th> <th>Parameter</th> <th>unit</th> <th>Hulu</th> <th>Hilir</th> <th>Hulu</th> <th>Hilir</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>-</td> <td>5.07</td> <td>5.44</td> <td>4.63</td> <td>Draught</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>mg/L</td> <td>1</td> <td>1</td> <td>1</td> <td>-</td> </tr> <tr> <td>3</td> <td>COD</td> <td>mg/L</td> <td>3</td> <td>5</td> <td>5</td> <td>-</td> </tr> <tr> <td>4</td> <td>DO</td> <td>mg/L</td> <td>5.94</td> <td>6.83</td> <td>8.0</td> <td>-</td> </tr> <tr> <td>5</td> <td>S Solids</td> <td>mg/L</td> <td>22</td> <td>14</td> <td>2</td> <td>-</td> </tr> <tr> <td>8</td> <td>T Nitrogen</td> <td>mg/L</td> <td>0.2</td> <td>0.1</td> <td>0.1</td> <td>-</td> </tr> </tbody> </table>							K11E		18/11/21		14/8/19			Parameter	unit	Hulu	Hilir	Hulu	Hilir	1	PH	-	5.07	5.44	4.63	Draught	2	BOD	mg/L	1	1	1	-	3	COD	mg/L	3	5	5	-	4	DO	mg/L	5.94	6.83	8.0	-	5	S Solids	mg/L	22	14	2	-	8	T Nitrogen	mg/L	0.2	0.1	0.1	-
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4.5.5.2	<p>Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.</p> <p>- Major compliance -</p>	<p>The mill at current had no plan to phase out the existing discharge method. However, the following initiatives are planned by the management for the BOD reduction.</p> <table border="1"> <thead> <tr> <th>Projects</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> </tr> </tbody> </table>						Projects	Details			Complied																																																			
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MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance
		1	Operation Transfer 1 unit decanter form Triang POM Feb 2022 at RM 30K. Reduce BOD before treatment in ETP.	
		2	Environmental Expand width and height of Effluent pond bund 12 units completion in Mac 2022 at RM 62K. This is to improve retention with possible overflowing.	
		3	Environmental Effluent pond desludging 3 units completion in Dec 2021 at RM70K.	
		4	Environmental VORSEP installation in Dec 2018 to improve dust particulate RM 2M.	
		5	Environmental Shredded plant EFB completion in April 2019 at RM 2.2M sold at external buyer.	
		6	Environmental Bio-Polishing Plant in 2022. Reduce BOD in final discharge.	
		7	Environmental Surface aerator in Dec 2021 at RM 20K to reduce BOD final discharge	
4.6 Principle 6: Best Practices				
Criterion 4.6.1: Mill Management				
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	The mill processing system is documented in the following documents among others: i. The Mill Lestari Processing Manual ii. Mill Standard Operating Procedure iii. The Mill Quality Management Manual iv. Prosedur Kerja Selamat		Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																
		<p>v. Manual Kelestarian (Sustainability)</p> <p>These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from:</p> <ul style="list-style-type: none"> i. The reception, sterilization, threshing, pressing, ii. Clarification, depericarping (nut polishing) station, iii. Effluent, laboratory, workshop, dispatches etc. <p>In addition, there are also manuals available within the industry and MPOB that are used as guidelines.</p>																	
4.6.1.2	<p>All palm oil mills shall implement best practices.</p> <p>- Major compliance -</p>	<p>The monitoring of the mill process is made through the shift supervision headed by an Assistant Engineer. All process parameters are documented and summarized in a daily report.</p> <p>The external monitoring is made through visits by the RC/ZH and also technical personnel from the Head Office. DOSH performed the annual UPV machinery inspection. In addition, there are audits by SCCD and ADK. This is to ensure compliance to Policies, procedures in relation mill operations, financial, OSH, welfare among others. Other mechanism as described below.</p> <table border="1"> <thead> <tr> <th></th> <th>Areas</th> <th>Action/Activities</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1</td> <td rowspan="2">Daily</td> <td>Supervision by staff/Assist/Manager</td> </tr> <tr> <td>Report of daily activities/costings/variation</td> </tr> <tr> <td rowspan="4">2</td> <td rowspan="4">Schedule</td> <td>Quarterly ESH meeting</td> </tr> <tr> <td>Internal audits by GCAD / SHO</td> </tr> <tr> <td>External audit RSPO / MSPO</td> </tr> <tr> <td>Zone Head / Regional Controller visit</td> </tr> <tr> <td>3</td> <td>Annual</td> <td>Annual EPMC</td> </tr> </tbody> </table>		Areas	Action/Activities	1	Daily	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	Complied
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Criterion / Indicator		Assessment Findings	Compliance																														
		<table border="1"> <tr> <td></td> <td>Medical surveillance</td> </tr> </table> <p>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.</p>		Medical surveillance																													
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Criterion 4.6.2: Economic and financial viability plan																																	
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p>	<p>The annual business plan 2021-2025 is available. The document is in the form of annual budget and the projection for 5 years (Budget year, PY2, PY3, PY4, PY5) prepared as guidance for future planning. The business plan contains FFB processed, production of CPO & CPK.</p> <p>The Component of operating expenditure among others includes:</p> <ul style="list-style-type: none"> • Process labour, • Maintenance external, maintenance parts, • Consumable, EVIT, • Admin cost, • Labour overhead. <table border="1"> <thead> <tr> <th>Year</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>FFB processed</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>OER</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>KER</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Administration</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> </tbody> </table>	Year	2021	2022	2023	2024	2025	FFB processed	x	x	x	x	x	OER	x	x	x	x	x	KER	x	x	x	x	x	Administration	x	x	x	x	x	Complied
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MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings					Compliance	
		Processing cost	x	x	x	x	x	
		Depreciation	x	x	x	x	x	
		H Q charges	x	x	x	x	x	
		RM/mt FFB	x	x	x	x	x	
		RM/mt CPO	x	x	x	x	x	
		Inclusive in the business plan is also Capital Expenditure (CAPEX) among others showing expenditure on: <ol style="list-style-type: none"> 1. Replacement / upgrading of building 2. Machinery 3. Workers' amenities and staff The profit and loss statement were made available prepared by the Regional office/Head Office.						
Criterion 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 -	The payment term is 60 days from the date of invoice submitted as per the Terms and Conditions of Purchase or Surat Perintah Kerja (SPK).					Complied	
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Sampled of the payment records of contractors as below: <ol style="list-style-type: none"> 1. INV# 1066,1061,1062,1063 & 1064 dated 02/11/2021; Payment made on 09/11/2021. Interviewed with the contractor confirmed that payment was made promptly as per the agreed term.					Complied	
Criterion 4.6.4: Contractor								

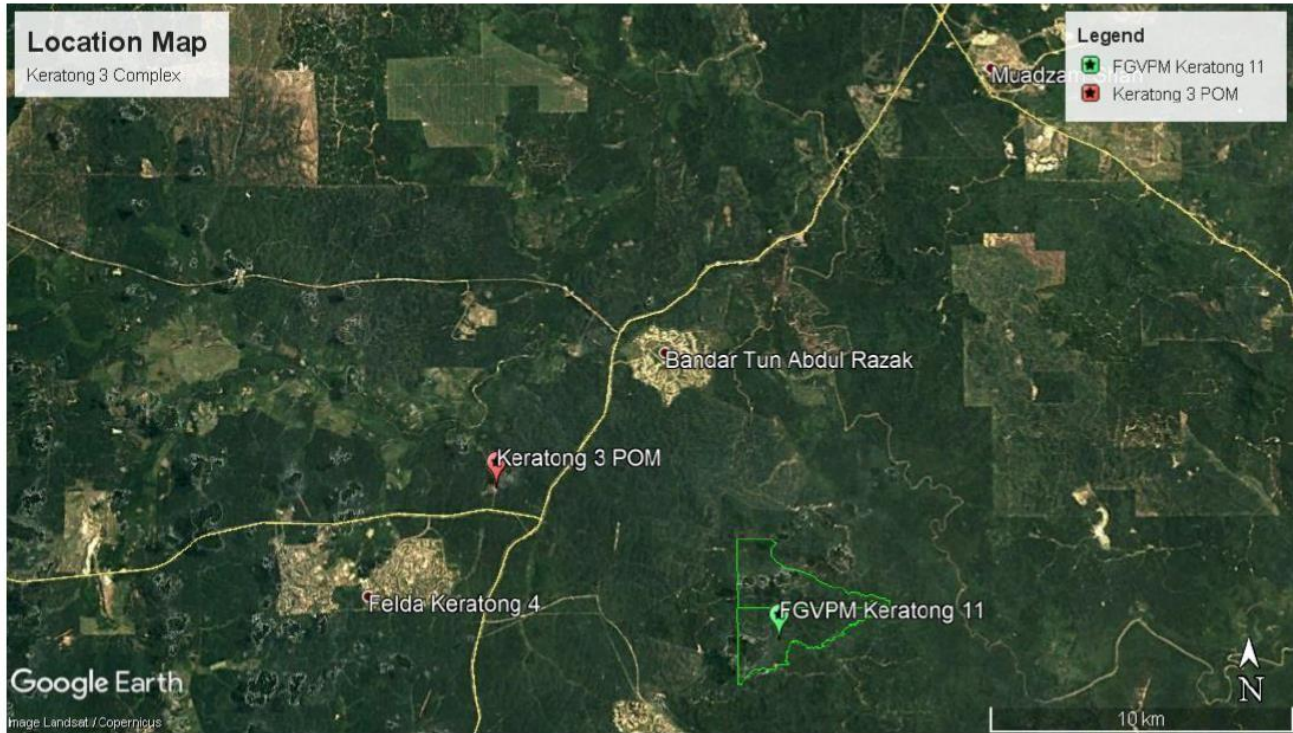
MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
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 -	The contractors engaged by the mill has been signed on the addendum for MSPO requirements and they have been briefed on the MSPO requirements during the stakeholder meeting. Management of FGV Keratong 3 conducted the training to contractor Mohd Aliff and Tinta Bumu Enterprise dated 20/2/2021. Sighted record of evaluation been conducted to contractor and showed they understand regarding to MSPO requirement.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	The contractors have signed an agreement prior to work. Agreement for the Tinta Bumi Enterprise and Mohd Aliff with FGV was sighted and available as per below: 1. Mohd Nur Aliff Bin Kidam 22/12/2020 2. Tinta Bumi Enterprise dated 1/2/2021	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 per the Approval Letter signed by contractor for accept MSPO approved auditors to verify the assessment through a physical inspection if necessary. The agreement signed as per below dated: 1) Tinta Bumi Enterprise – 4/1/2021 2) Mohd Nur Aliff Bin Kidam – 4/1/2021	Complied

Appendix B: Smallholder Member Details

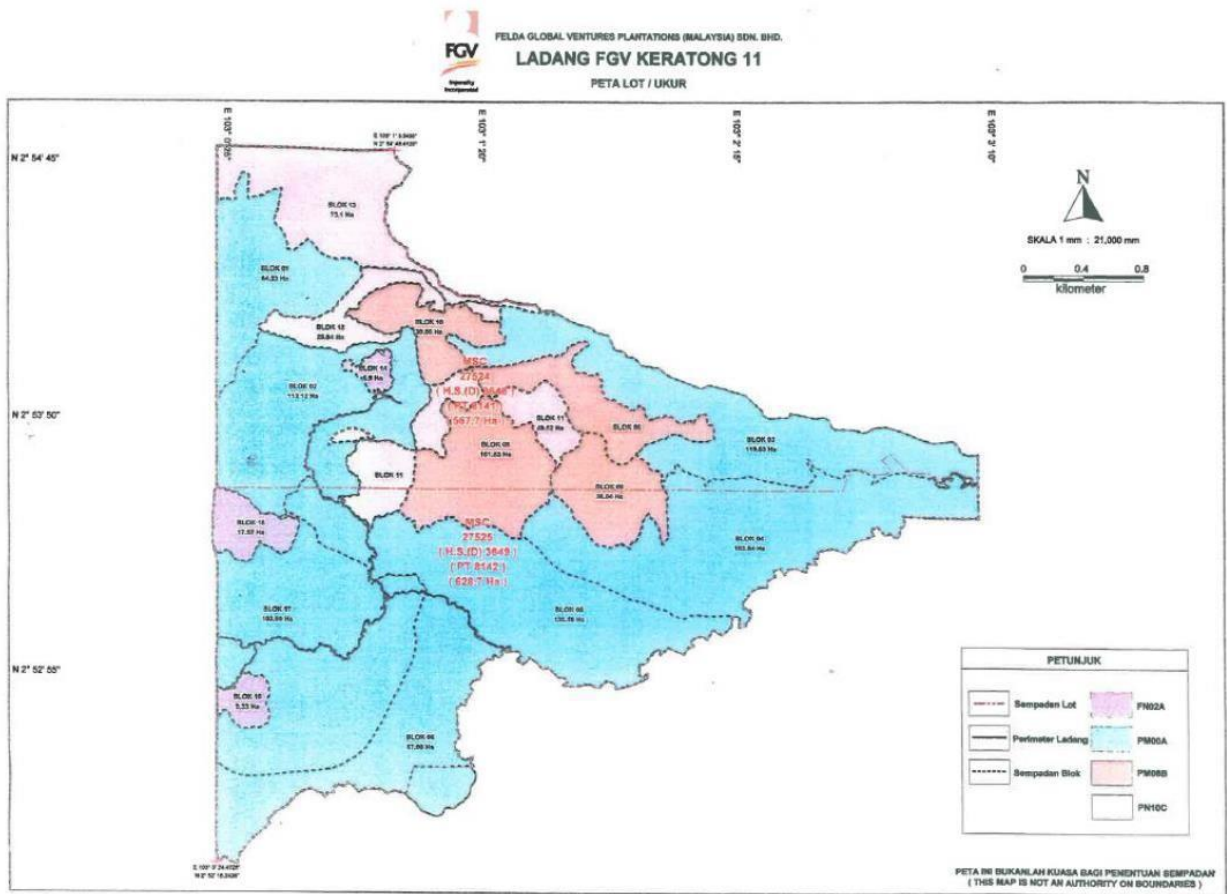
No.	Smallholder		Location of Planted Area (District)	GPS Coordinates		Certified Area (ha)	Planted Area (ha)
	Name	MPOB License Number		Latitude	Longitude		
	Nil						

Appendix C: Location and Field Map



FGVPISB Keratong 3 POM Location

Appendix E: FGV Keratong 11 Field Map



FGVPM Keratong 11 Estate Field Map

Appendix D: 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