

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

- Initial Assessment
- Annual Surveillance Assessment (Choose an item.)
- Recertification Assessment (RA 1)
- Extension of Scope

<b>GENTING PLANTATIONS BERHAD</b>
Client Company (HQ) Address: 10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
Certification Unit: Genting Oil Mill Sdn Bhd Genting Ayer Item Oil Mill & Plantations: Genting Kulai Besar Estate, Genting Sri Gading Estate, Genting Sungei Rayat Estate, Genting Tanah Merah Estate and Genting Tebong Estate
Date of Final Report: 17/5/2023

**Report prepared by:**  
**Muhamad Naquiuddin Mazeli** (Lead Auditor)

**Report Number: 3717733**

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

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## Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
<b>Company Name</b>	Genting Plantations Berhad		
<b>Mill/Estate</b>	<b>Certification Unit</b>	<b>MPOB License No.</b>	<b>Expiry Date</b>
	Genting Ayer Item Oil Mill	500056704000	31/01/2024
	Genting Kulai Besar Estate	509591102000, 508595302000, 540060011000	30/04/2023 30/04/2023 31/05/2023
	Genting Sri Gading Estate	508592902000, 508842111000, 524435102000	03/04/2023 30/06/2023 31/10/2023
	Genting Sungei Rayat Estate	508590202000, 501298102000	30/04/2023 31/03/2023
	Genting Tanah Merah Estate	538065011000, 559916701000, 611773002000, 609122002000, 513814002000, 617898021000	31/03/2023 28/02/2023 31/05/2023 29/02/2023 30/06/2023 31/12/2023
	Genting Tebong Estate	501803202000, 539822011000, 501667602000, 501866102000	30/11/2023 31/05/2023 31/03/2023 31/12/2023
	<b>Address</b>	10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia	
<b>Management Representative</b>	Mr Arunan Kandasamy (Senior Vice President-Plantations Malaysia)		
<b>Website</b>	www.gentingplantations.com	<b>E-mail</b>	Arunan.kandasamy@genting.com
<b>Telephone</b>	03-2333 6401	<b>Facsimile</b>	N/A

1.2 Certification Information			
<b>Certificate Number</b>	Mill: MSPO 682363 Estate: MSPO 696629	<b>Certificate Start Date</b>	29/06/2023
<b>Date of First Certification</b>	29/06/2018	<b>Certificate Expiry Date</b>	28/06/2028
<b>Scope of Certification</b>	<input checked="" type="checkbox"/> Mill: Production of Sustainable Palm Oil and Palm Oil Products <input checked="" type="checkbox"/> Estate: Production of Sustainable Oil Palm Fruits		
<b>Visit Objectives</b>	The objective of the recertification assessment is to conduct a recertification assessment to ensure the elements of the scope of registration and the requirements of the management standard are effectively addressed by Genting Ayer Item POM and supply estate management system and the ability of the		

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	management system to ensure the organisation meets applicable statutory, regulatory and contractual requirements and as applicable, to identify areas for potential improvement of the management system.
<b>Standard</b>	<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
<b>Recertification</b>	13/02/2023 -17/02/2023
<b>Continuous Assessment Visit Date (CAV) 1_1</b>	-
<b>Continuous Assessment Visit Date (CAV) 2_1</b>	-
<b>Continuous Assessment Visit Date (CAV) 3_1</b>	-
<b>Continuous Assessment Visit Date (CAV) 4_1</b>	-

<b>1.3 Other Certifications</b>			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
EU-ISCC-Cert-DE11960213390	International Sustainability and Carbon Certification (EU)	ASG Cert GmbH	31/10/2023
RSPO 653474	RSPO Principles & Criteria for Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019; with Identity Preserved Supply Chain Module	BSI Services Malaysia Sdn Bhd	25/03/2025
MSPO 716638	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018	BSI Services Malaysia Sdn Bhd	23/10/2024
GKBE: MPOB/CoP/NN/0409	Code of Good Nursery Practice for Oil Palm Nurseries	Malaysian Palm Oil Board (MPOB)	18/11/2023
GSGE: MPOB/CoP/NN/0023-2	Code of Good Nursery Practice for Oil Palm Nurseries	Malaysian Palm Oil Board (MPOB)	01/05/2023
GTME: MPOB/CoP/NN/0003-2	Code of Good Nursery Practice for Oil Palm Nurseries	Malaysian Palm Oil Board (MPOB)	16/09/2023
GTBE: MPOB/CoP/NN/0269-1	Code of Good Nursery Practice for Oil Palm Nurseries	Malaysian Palm Oil Board (MPOB)	28/11/2023

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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
Genting Ayer Item Oil Mill	Batu 54, Jalan Johor, 86100 Ayer Hitam, Johor, Malaysia	1° 51' 24.15" N	103° 12' 35.96" E
Genting Kulai Besar Estate	No. 1213-1215, Jalan Kasturi 36/45, Indahpura, 81000 Kulai, Johor, Malaysia	1° 36' 55.33" N	103° 36' 39.56" E
Genting Sri Gading Estate	Jalan Bt Pahat - Kluang, KM 12, Sri Gading, 83009 Bt Pahat, Johor, Malaysia	1° 50' 17.84" N	103° 01' 05.62" E
Genting Sungei Rayat Estate	Jalan Sri Gading - Pt Yaani, KM 5, Sri Gading, 83009 Bt Pahat, Johor, Malaysia	1° 54' 14.54" N	103° 00' 38.48" E
Genting Tanah Merah Estate	Jalan Tangkak - Segamat, KM 3, 84907 Tangkak, Johor, Malaysia	2° 16' 53.93" N	102° 33' 37.18" E
Genting Tebong Estate	Jalan Tebong - Batang Melaka, KM 4, 76460 Tebong, Melaka, Malaysia	2° 27' 20.05" N	102° 21' 38.44" E

1.5 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Kulai Besar Estate	2,027.37	35.06	779.62	2,842.05	71.33
Genting Sri Gading Estate	3,309.73	29.93	391.72	3,731.38	88.70
Genting Sungei Rayat Estate	2,300.78	0.18	78.02	2,378.98	96.71
Genting Tanah Merah Estate	2,044.96	46.60	150.49	2,242.05	91.20
Genting Tebong Estate	2,872.40	45.29	92.04	3,009.73	95.40
<b>Total (ha)</b>	<b>12,555.24</b>	<b>157.06</b>	<b>1,491.89</b>	<b>14,204.19</b>	

1.6 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Kulai Besar Estate	431.91	593.57	400.10	255.53	346.26	1,595.46	431.91
Genting Sri Gading Estate	676.06	941.33	834.04	670.36	187.94	2,633.67	676.06
Genting Sungei Rayat Estate	191.26	507.09	965.19	604.69	32.55	2,109.52	191.26
Genting Tanah Merah Estate	297.28	544.85	277.66	634.96	290.21	1,747.68	297.28

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Genting Tebong Estate	641.86	740.30	225.50	679.89	584.85	2,230.54	641.86
<b>Total (ha)</b>	<b>2,238.37</b>	<b>3,327.14</b>	<b>2,702.49</b>	<b>2,802.39</b>	<b>1,441.81</b>	<b>10,273.83</b>	<b>2,238.37</b>

#### 1.7 Certified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Jun 22 - May 23)	Actual (Mar 22 - Jan 23)	Forecast (Jun 23 - May 24)
Genting Kulai Besar Estate	34,515.00	33,246.11	38,352.00
Genting Sri Gading Estate	60,710.00	58,746.52	61,400.00
Genting Sungei Rayat Estate	46,800.00	48,994.65	54,810.00
Genting Tanah Merah Estate	23,125.00	27,626.98	29,961.00
Genting Tebong Estate	46,050.00	48,699.87	51,912.00
<b>Total (mt)</b>	<b>211,200.00</b>	<b>217,314.13</b>	<b>236,435.00</b>

#### 1.8 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Jun 22 - May 23)	Actual (Mar 22 - Jan 23)	Forecast (Jun 23 - May 24)
Nil	0	0	0
<b>Total (mt)</b>	<b>0</b>	<b>0</b>	<b>0</b>

#### 1.9 Certified Tonnage

	Estimated (Jun 22 - May 23)	Actual (Mar 22 - Jan 23)	Forecast (Jun 23 - May 24)
	<b>Mill Capacity: 60 MT/hr</b>	<b>FFB</b>	<b>FFB</b>
	211,200.00	217,314.13	236,435.00
<b>SCC Model: SG</b>	<b>CPO (OER: 20.50%)</b>	<b>CPO (OER: 20.02%)</b>	<b>CPO (OER: 20.41%)</b>
	43,296.00	43,509.45	48,256.00
	<b>PK (KER: 5.50%)</b>	<b>PK (KER: 5.16%)</b>	<b>PK (KER: 5.25%)</b>
	11,616.00	11,214.56	12,413.00

#### 1.10 Actual Sold Volume (CPO)

CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
43,509.45	0	0	43,273.12	0	43,273.12

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<b>1.11 Actual Sold Volume (PK)</b>					
<b>PK (mt)</b>	<b>MSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSPO</b>		
11,214.56	0	0	11,010.37	0	11,010.37

## 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 reassessment was conducted from 13-17/02/2023. The public notification have been published on 11/01/2023 as per <https://www.bsigroup.com/globalassets/localfiles/en-my/mspo/Public%20Notification/2023/01-01mspo-public-notification-recertification-genting-ayer-item-oil-mill--supply-base-english.pdf>. The audit programme is included in Section 2.4. The approach to the audit was to treat the Genting Ayer Item Palm Oil Mill and Supply base 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 reassessment are detailed in Section 4.2. Major nonconformities were close offsite due to evidence submission was sufficient.



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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.

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

<b>Assessment Program</b>					
<b>Name (Mill / Plantation / Group smallholders)</b>	<b>Year 1 (Recertification)</b>	<b>Year 2 (ASA 1_1)</b>	<b>Year 3 (ASA 1_2)</b>	<b>Year 4 (ASA 1_3)</b>	<b>Year 5 (ASA 1_4)</b>
Genting Ayer Item Oil Mill	√	√	√	√	√
Genting Kulai Besar Estate		√	√		√
Genting Sri Gading Estate	√			√	
Genting Sungei Rayat Estate	√	√	√		√
Genting Tanah Merah Estate	√	√		√	
Genting Tebong Estate			√	√	√

**Tentative Date of Next Visit: February 5, 2024 - February 9, 2024**

**Total No. of Mandays: 12 Mandays**

**2.1 BSI Assessment Team**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Muhamad Naquiuddin Mazeli (MNM)	Team Leader	<p><b>Education:</b> Bachelor Science Horticulture, UPM.</p> <p><b>Work Experience:</b> 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, managed, implement, and monitors the RSPO, ISCC, MSPO and ISO 9001 and ISO 45001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also supports in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company.</p> <p><b>Training attended:</b> ISO 9001:2015 LA Training (2019), ISO 14001:2015 LA Training (2018), ISO 45001:2018 LA Training (2018), HCV &amp; HCS Training (2019), RSPO P&amp;C LA Training (2018), MSPO LA Training (2018), SMETA Training (2021), SCCS Training and Refresher (2019).</p> <p><b>Aspect covered in this audit:</b></p>

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		<p>During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, smallholders inclusion, legal requirements, environment, RSPO supply chain and HCV.</p> <p><b>Language proficiency:</b>          Fluent in both verbal/written Bahasa Malaysia and English Language.</p>
Amir Bahari (AB)	Team Member	<p><b>Education:</b>          He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 &amp; Diploma in Palm Oil Milling Tech/Management MPOB 1996.</p> <p><b>Work Experience:</b>          He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment, he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 &amp; also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry.</p> <p><b>Training attended:</b>          ISO 9001, ISO 14001, OHSAS 18001 &amp; also RSPO.</p> <p><b>Aspect covered in this audit:</b>          During the assessment he covered mills and estates best practices, workers consultation and occupational safety &amp; health.</p> <p><b>Language proficiency:</b>          Fluent in both verbal/written Bahasa Malaysia and English Language.</p>
Mohamad Fitri bin Mustafa (MFM)	Team Member	<p><b>Education:</b>          Bachelor of Science Agribusiness, graduated from University Putra Malaysia in 2007.</p> <p><b>Work Experience:</b>          Started his career as research officer with Malaysian Agri Hi Tech Sdn Bhd, before servicing as agronomist at Tradewinds Plantations Berhad and FASSB. Accumulating his experience in sustainability when he serves as an auditor with Global Gateway Sdn Bhd since 2018.</p> <p><b>Training attended:</b>          Completed his training for MSP0 Lead Auditor Course and ISO 9001:2015 Lead Auditor Course in 2018 and RSPO Lead Auditor Course in year 2019. Completing SHO Course in 2022.</p> <p><b>Aspect covered in this audit:</b>          General Management, Occupational Safety &amp; Health Management, Plantation (Agriculture &amp; Agribusiness) Management, Malaysian Sustainable Palm Oil (MSPO).</p> <p><b>Language proficiency:</b>          Fluent in both verbal/written Bahasa Malaysia and English Language.</p>
Mohd Sabre Salim (MSS)	Peer Reviewer	<p><b>Education:</b>          Master's in Business Administration (MBA) from UiTM in 2006 and Bachelor Science Agribusiness from UPM in 1986.</p> <p><b>Work Experience:</b></p>

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		<p>He gained his working exposure in the plantation sector, serving as an Plantation Manager with Hap Seng Plantation Berhad and currently as consultant, free-lance lecturer, and trainer at MDV Management Sdn Bhd. He has more than 50 MSPO report that has been reviewed.</p> <p><b>Training attended:</b>          He has completed Endorsed Lead Auditor Course and Endorsed MSPO Lead Auditor Course and MSPO Peer Review certificate by MPOCC. He has attended MSPO Peer Reviewer 1 - 2017 by MPOCC.</p> <p><b>Expertise:</b>          General management, leadership &amp; financial management, occupational safety &amp; health management, plantation (agriculture &amp; agribusiness) management, Malaysian Sustainable Palm Oil (MSPO).</p>
Muhammad Sufyan Azmi (MSA)	Peer Reviewer	<p><b>Education:</b>          Master's in Business Administration (MBA) from Open University Of Malaysia and Bachelor Degree in Bioindustry from UPM in 2006.</p> <p><b>Work Experience:</b>          He gained his working exposure in the plantation sector with 15 years' experience, currently serving as a Plantation Manager with TSH Resources Berhad and previously as an Audit Executive with Kulim Malaysia Berhad.</p> <p><b>Training attended:</b>          He has attended MSPO Peer Reviewer 2 - 2017 by MPOCC.</p> <p><b>Expertise:</b>          General management, auditing, environment and plantation management.</p>

**2.2 Impartiality and conflict of interest**

During this re-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
1.	Valence Shem	Qualifying Reviewer

**2.4 Assessment Plan**

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

Date	Time	Subjects	MNM	ABH	MFM
Sunday 12/02/2023		Travelling to Tangkak	√	√	√

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Date	Time	Subjects	MNM	ABH	MFM
Monday 13/02/2023 Genting Tanah Merah Estate	0800 - 0830 0830 - 0900	Opening Meeting MSPO: <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan.</li> </ul>	√	√	√
	0900 - 1230	Genting Tanah Merah 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.	√	√	√
	1230 - 1330	Lunch	√	√	√
	1330 - 1630	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	√	√	√
	1630 - 1700	Interim Closing briefing and travel to Pinetree Hotel, Batu Pahat.	√	√	√
Tuesday 14/02/2023 Genting Sri Gading Estate & Genting Tanah Merah Estate	0830 - 1230	Genting Sri Gading 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.	√	√	
	0830 - 1230	Genting Tanah Merah Estate: Continue Document and site verification			√
	1230 - 1330	Lunch	√	√	√
	1330 - 1600	Genting Sri Gading Estate 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	√	√	
	1330 - 1600	Genting Tanah Merah Estate: Continue Document and site verification			√
	1600 - 1700	Interim Closing briefing and travel to Pinetree Hotel, Batu Pahat.	√	√	√

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Wednesday 15/02/2023  Genting Sri Gading Estate & Genting Sungei Rakyat Estate	0830 - 1230	Genting Sungei Rakyat 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.		√	
	0830 - 1230	Genting Sri Gading Estate: Continue Document and site verification. Stakeholder Consultation	√		√
	1230 - 1330	Lunch	√	√	√
	1330 - 1600	Genting Sungei Rakyat Estate 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		√	
		Genting Sri Gading Estate: Continue Document and site verification.	√		√
	1600 - 1700	Interim Closing briefing	√	√	√
Thursday 16/02/2023  Genting Sungei Rakyat Estate	0830 - 1230	Genting Sungei Rakyat 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.	√	√	√
	1230 - 1330	Lunch	√	√	√
	1330 - 1600	Genting Sungei Rakyat Estate 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 - 1700	Interim Closing briefing	√	√	√
Friday 17/02/2023  Genting Ayer Item POM	0830 - 1230	Genting Ayer Item 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.	√	√	√

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Date	Time	Subjects	MNM	ABH	MFM
	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 - 1630	Interim Closing briefing	√	√	√
	1630 - 1700	Discussion and Closing preparation	√	√	√
	1700 - 1730	Closing Meeting	√	√	√

### Section 3: Assessment Findings

#### 3.1 Details of audit results

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

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

#### 3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During the reassessment there were Two (2) Major & One (1) Minor nonconformities and Zero (0) OFI raised. The Genting Plantations Berhad, Genting Ayer Item POM 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			
<b>NCR Ref #:</b>	2307753-202302-M1	<b>Issue Date:</b>	17/02/2023
<b>Due Date:</b>	16/05/2023	<b>Date of Closure:</b>	17/04/2023
<b>Area/Process:</b>	Genting Sri Gading Estate, Genting Tanah Merah Estate, Genting Sg Rayat Estate	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 3: 4.4.4.2 b, c Major
<b>Requirements:</b>	The occupational safety and health plan shall cover the following: b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices; and ii. all precautions attached to products shall be properly observed and applied.		
<b>Statement of Nonconformity:</b>	Found occupational safety and health plan inadequately implemented.		
<b>Objective Evidence:</b>	In GTME, found 1 worker was not wearing earplug during driving the tractor, as per verification the driver (shanker) was one of 3 person who is affected with hearing loss as per audiometric test report dated 8/3/2022. The management already conducted the hearing conservation training on 8/3/2022, however 3 persons		

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	<p>included the affected (shanker) was not attend the training. This was not followed as per NRA dated 15/5/2021.</p> <p>In GSGE, the management already send the workers for audiometric test at Poliklinik Intan (RZ Intan Medicare Sdn Bhd) with total workers 26 peoples. However, found workers under workshop and small tractor was not sent for audiometric test not followed as per Noise Risk Assessment (NRA) dated 8/6/2021 (Reg. Report: JH/05/04/116) by Allied Chemists.</p> <p>Found in all estate, The JKPP 7 record was not included in the JKPP 8 during submission. The JKPP 8 that been review was:</p> <p>GTME: JKPP8/132849/2022          GSGE: JKPP8/127650/2023          GSRE: JKPP8/127415/2022</p> <p>Record JKPP 7 review:</p> <p>GTME: 03/06/2022 &amp; 08/03/2022          GSGE: 03/02/2022          GSRE: 10/02/2022</p>
<p><b>Corrections:</b></p>	<ul style="list-style-type: none"> <li>(i) Immediately conduct the training to all workers to attend the Hearing Conservation Training.</li> <li>(ii) To send the workshop attendants and all the drivers to attend the baseline and annual audiometric test according to the NRA assessment.</li> <li>(iii) To notify/update/re-submit to DOSH on the correct figure by including JKPP 7 into JKPP 8 declarations.</li> </ul>
<p><b>Root cause analysis:</b></p>	<ul style="list-style-type: none"> <li>(i) (GTME) On the day of the training, the workers were absent for work despite reminders one day before the training.</li> <li>(ii) (GSGE) Internal assessment does not show noise level above 85db and the above workers (workshop workers &amp; small tractor drivers) not exposed continuously to 8 hours of work. In view of this, we delayed the audiometric test and re-scheduled them for the test in 2023.  This is the first time we are doing noise regulation and we don't have enough knowledge on the noise regulation.</li> <li>(iii) (GTME, GSGE, GSRE)             <ul style="list-style-type: none"> <li>- Lack of knowledge by the person in-charge (PIC)</li> <li>- The PIC didn't include JKPP 7 into the JKPP 8 due to first time doing the compilation coupled with new requirement of NRA implementation.</li> </ul> </li> </ul>
<p><b>Corrective Actions:</b></p>	<ul style="list-style-type: none"> <li>(i) To ensure all participants must attend the training by checking the workers name list based on their job before starting the training; if any workers unable to attend due to absent/ sick leave etc, to conduct re-training as soon as possible.</li> <li>(ii) To train and brief management team on this audiometric test requirement that all workers as per the Noise Risk Assessment (NRA) shall be sent for the audiometric test, and to consult the Safety and Health Officer (SHO) accordingly if any doubt/ change in decision making.</li> <li>(iii) Training and briefing (including refresher training) to the PIC on requirements of data submission/ declaration to DOSH.</li> </ul>



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	Submit JKPP 6, 7 and 8 to Safety and Health Officer (SHO) for his review and endorsement before submitting to DOSH.
<b>Assessment Conclusion:</b>	<p>Based on the evidence provided, it is verified that training on 'Noise Risk at Workplace' to all workers (including the above mentioned 3 workers) has been conducted.</p> <p>List of workers to be send for the audiometric test is available.</p> <p>Training records (training to the management team) is available.</p> <p>Verified on JKPP 8 resubmission:</p> <p>GTME (submission dated 18/02/23 to DOSH, and JKPP 8 - before and after resubmission)</p> <p>GSGE (submission dated 16/02/23 to DOSH)</p> <p>GSRE (Emailed dated 10/02/23, to DOSH Putrajaya to amend the JKPP 8 data which to include JKPP 7 also in the reports.</p> <p>The evidence found adequate to close the Major NC. Thus, the Major NC is effectively closed on 17/04/2023. Further verification will be conducted in the next surveillance audit.</p>

<b>Non-Conformity Report</b>			
<b>NCR Ref #:</b>	2307753-202302-M2	<b>Issue Date:</b>	17/02/2023
<b>Due Date:</b>	16/05/2023	<b>Date of Closure:</b>	17/04/2023
<b>Area/Process:</b>	Genting Sg Rayat Estate	<b>Clause &amp; Category (Major / Minor)</b>	MSPO 2530 Part 3: 4.5.3.3 Major
<b>Requirements:</b>	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.		
<b>Statement of Nonconformity:</b>	The SOP in relation to the Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations(Scheduled Waste) 2005 was not effectively implemented.		
<b>Objective Evidence:</b>	Sg Rayat Estate 16/02/2023 - Visit to the workshop area discovered presence of empty lubricants containers and used rags being disposed into a dustbin and not stored at the designated containers.		
<b>Corrections:</b>	(i) The empty lubricant containers and rags were removed from the dustbin and disposed at scheduled waste store. (ii) Training and briefing to the welder on the Scheduled Waste Management including its categories, disposal, inventory update etc.		
<b>Root cause analysis:</b>	Inadequate training to the newly appointed workshop welder, and poor supervision by the workshop foreman.		
<b>Corrective Actions:</b>	Training and regular inspection (on daily basis) by the workshop foreman upon engaging any new workers at workshop until the new workers complies fully with the scheduled waste requirements.		
<b>Assessment Conclusion:</b>	Based on evidence verification on training done on 23/02/2023, evaluation and inspection record. The evidence found adequate to close the Major NC. Thus, the		

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	Major NC is effectively closed on 17/04/2023. Further verification will be conducted in the next surveillance audit.
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Non-Conformity Report			
<b>NCR Ref #:</b>	2307753-202302-N1	<b>Issue Date:</b>	17/02/2023
<b>Due Date:</b>	Next Surveillance	<b>Date of Closure:</b>	Open
<b>Area/Process:</b>	Genting Sg Rayat Estate	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO Part 3: 4.3.1.4 Minor
<b>Requirements:</b>	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.		
<b>Statement of Nonconformity:</b>	The monitoring of machinery CF renewal is not effective.		
<b>Objective Evidence:</b>	There were 2 units of air compressor (PMT 14835 and PMT 15784) in Genting Sg Rayat Estate having an expired CF dated 10/11/2022. Renewal bDOSH was made dated 16/11/2022.		
<b>Corrections:</b>	Training and briefing to the PIC to renew permits before the expiry dates and follow up accordingly, and training on Sustainability Management Procedure (SMP-GPB-22; FMA Act1967; Act 139; Section 19; Certificate of Fitness). To follow up with DOSH on the submission for renewal of the 2 units air compressor done in 16/11/22.		
<b>Root cause analysis:</b>	Inadequate training to the person-in-charge on the monitoring of the permits.		
<b>Corrective Actions:</b>	Latest appointment letter issued (to Pn. Siti and Pn. Amira) as person in-charge to monitor the legal requirements.		
<b>Assessment Conclusion:</b>	CAP has been reviewed and satisfied. Effectiveness of the implementation will be review during the next ASA.		

Opportunity For Improvement			
<b>Ref:</b>	Nil	<b>Clause:</b>	MSPO Part __: N/A
<b>Area/Process:</b>	N/A		
<b>Objective Evidence:</b>	N/A		

Noteworthy Positive Comments	
1	Good planning on management unit operations
2	Positive comments by most external stakeholders
3	Good commitment given by all personnel involved

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

Non-Conformity Report			
<b>NCR Ref #:</b>	2167146-202202-N1	<b>Issue Date:</b>	17/02/2022
<b>Due Date:</b>	Next Surveillance	<b>Date of Closure:</b>	17/02/2023
<b>Area/Process:</b>	Genting Kulai Besar Estate	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 3: 4.4.2.2 Minor
<b>Requirements:</b>	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.		
<b>Statement of Nonconformity:</b>	Complaint that received has not been recorded in the complaint book.		
<b>Objective Evidence:</b>	Union meeting has been conducted for Genting Kulai Besar Estate on 23/12/2021 with attendance of workers representative and 2 observers from management. Some issues have been raised during the meeting such as some toilet for labour quarters is damage and to repair main road at the entrance. However, input from the meeting and progress of action taken has not been translated and recorded in the complaint book.		
<b>Corrections:</b>	The complaints (from the meeting) had been recorded in the 'Complaints & Grievances Book' and relevant actions had been taken to solve the toilets and main road repair issues.		
<b>Root cause analysis:</b>	'Workers Committee Procedure (SMP-GPB-32)' did not require the complaints raised during the Worker Committee meeting to be recorded in the 'Complaints & Grievances Book'. This is to avoid double entry (i.e. at both minutes of meeting and Complaints & Grievances Book')		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>SD to update the 'Workers Committee Procedure (SMP-GPB-32)' accordingly.</li> <li>Estate Manager to brief all executives and staffs to ensure every complaint raised during any meetings (i.e. Workers Committee Meeting, Gender Committee Meeting etc), shall be recorded in the Complaints &amp; Grievances Book'.</li> <li>Management team must ensure the 'Complaints &amp; Grievances Book' available during every meeting.</li> </ol>		
<b>Assessment Conclusion:</b>	CAP has been reviewed and satisfied. Effectiveness of the implementation will be review during the next ASA.		
<b>Assessment Verification:</b>	Sustainability Department had updated the Workers Committee Procedure, document no: SMP-GPB-32, revision no: 02, effective on June 2022. Sighted record of training on Complaint & Grievances Procedure was conducted on 23/09/2022. Verification on issue and minute meeting of union the issue has been solved on timely manner. No recurrence issue was sighted thus Minor NC was close on 17/02/2023.		

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Non-Conformity Report			
<b>NCR Ref #:</b>	2167146-202202-N2	<b>Issue Date:</b>	17/02/2022
<b>Due Date:</b>	Next Surveillance	<b>Date of Closure:</b>	17/02/2023
<b>Area/Process:</b>	Genting Ayer Item POM	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 4: 4.4.2.2 Minor
<b>Requirements:</b>	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.		
<b>Statement of Nonconformity:</b>	Complaint received has not been responded in timely manner.		
<b>Objective Evidence:</b>	Genting Plantations Berhad has established SOP for dealing with complaints and documented in Sustainability Management Procedure Manual, Complaints and Grievances. Refer doc. no. SMP-GPB-19, rev. 04/03/2020. Stated in the procedure, timeframe to settle any complaint depending of the seriousness of the issues and the limit is within 1 month of complaint received. One complaint has been received by the management on 08/12/2021 from the canteen requested to change main cable at the canteen. However, there is no evidence that the complaint has been responded as per stated in the procedure (within 1 month).		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Management had recorded the response (to the complainant) in the 'Complaints and Grievances Book'.</li> <li>2. Electrical team to list down the required materials (to change the main cable) before proceed to obtain top management's approval.</li> </ol>		
<b>Root cause analysis:</b>	<p>Management had responded 'verbally' on the status/action to be taken to the complainant. Therefore, the response was not recorded in the 'Complaint and Grievances Book'.</p> <p>The above was due to inadequate awareness by the Management team.</p>		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Re-train management team (admin staffs/ executives/ section heads) on the 'Complaints and Grievances Procedure'.</li> <li>2. Monthly verification/follow up on all complaints received.</li> </ol>		
<b>Assessment Conclusion:</b>	CAP has been reviewed and satisfied. Effectiveness of the implementation will be review during the next ASA.		
<b>Assessment Verification:</b>	Genting Plantations Berhad had revised the Workers Committee Procedure, document no: SMP-GPB-32, revision: 02, effective on June 2022. Audit team reviewed the training on the Complaint & Grievances Procedure was conducted to section head on 17/09/2022. Briefing on the procedure to all employees made during the muster call. Verification on the record of grievance, no reoccurrence issue has been sighted and verified also with interview with the workers. Thus, Minor Nc was close on 17/02/2023.		

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Non-Conformity Report																								
<b>NCR Ref #:</b>	2167146-202202-N3	<b>Issue Date:</b>	17/02/2022																					
<b>Due Date:</b>	Next Surveillance	<b>Date of Closure:</b>	17/02/2023																					
<b>Area/Process:</b>	Genting Tebong Estate	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 3: 4.5.3.5 Minor																					
<b>Requirements:</b>	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.																							
<b>Statement of Nonconformity:</b>	Waste management at line site has not been properly monitored.																							
<b>Objective Evidence:</b>	During site visit at line site area at Kelemak Division, Genting Tebong Estate, sighted that domestic waste has been dumped behind of the labour quarters/inside the drain and cause blocked drainage.																							
<b>Corrections:</b>	All the domestic wastes were removed and disposed at landfill area. The blocked drain was cleared to allow proper water flow.																							
<b>Root cause analysis:</b>	Lack of awareness among workers, and inadequate monitoring & inspection by the management on the waste management.																							
<b>Corrective Actions:</b>	Re-train workers on waste management i.e. to dispose all domestic waste into the rubbish bin, so that it can be collected and disposed at landfill area. Re-train management staff to pay attention on the waste management during the weekly line site inspection and continue monitor the compliance.																							
<b>Assessment Conclusion:</b>	CAP has been reviewed and satisfied. Effectiveness of the implementation will be review during the next ASA.																							
<b>Assessment Verification:</b>	<p>Closure of NCR raised during the audit - Findings at as audit 13-17/2/23.</p> <p>a) Site visit to the staff/workers housing and entire complexes revealed domestic wastes were satisfactorily managed with proper disposal to the designated landfill.</p> <p>b) Visits to the 3 estates landfill concluded that the site were properly managed and followed the SOP established. There, no foreign containers / objects disposed at the landfills.</p> <p>c) Employees were trained during musters and also at site on adhoc basis. Records among others as shown below:</p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th></th> <th>Subject</th> <th>GTME</th> <th>GSGE</th> <th>GSRE</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Company Policies Briefing</td> <td>22/02/22</td> <td>19/12/22</td> <td>01/02/23</td> </tr> <tr> <td>2</td> <td>MSPO Briefing to Contractors</td> <td>13/10/22</td> <td>27/06/22</td> <td>28/11/22</td> </tr> <tr> <td>3</td> <td>Waste Management</td> <td>22/02/22</td> <td>20/12/22</td> <td>23/06/22</td> </tr> </tbody> </table> <p>As such the NCR raised is closed on 17/02/2023 and concluded.</p>					Subject	GTME	GSGE	GSRE	1	Company Policies Briefing	22/02/22	19/12/22	01/02/23	2	MSPO Briefing to Contractors	13/10/22	27/06/22	28/11/22	3	Waste Management	22/02/22	20/12/22	23/06/22
	Subject	GTME	GSGE	GSRE																				
1	Company Policies Briefing	22/02/22	19/12/22	01/02/23																				
2	MSPO Briefing to Contractors	13/10/22	27/06/22	28/11/22																				
3	Waste Management	22/02/22	20/12/22	23/06/22																				

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<b>Non-Conformity Report</b>			
<b>NCR Ref #:</b>	2167146-202202-N4	<b>Issue Date:</b>	17/02/2022
<b>Due Date:</b>	Next Surveillance	<b>Date of Closure:</b>	17/02/2023
<b>Area/Process:</b>	Genting Tebong, Genting Sungei Rayat Estate	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 3: 4.4.4.2 Minor
<b>Requirements:</b>	<p>The occupational safety and health plan shall cover the following:</p> <p>b) The risks of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <p style="margin-left: 20px;">i. all employees involved shall be adequately trained on safe working practices</p> <p style="margin-left: 20px;">ii. all precautions attached to products shall 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 identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p>		
<b>Statement of Nonconformity:</b>	Found occupational safety and health plan inadequately implemented.		
<b>Objective Evidence:</b>	<p>a) Verification sample on HIRARC for Tractor -FFB/Worker/Chemical (HIRARCGTME-06). Sighted the HIRARC was not included NRA recommendation on ear plug for tractor driver and also Hazard category was not completed in Genting Tebong Estate.</p> <p>b) Sighted during site visit in Tebong Estate safety helmet was not been wearing by tractor driver and not complying with the internal Standard operating procedure Doc no; OM-GPB-02, Ref. No: 01 dated 19/1/2016. As per below: PPE:- Safety Shoes, long sleeves, N95 Particulate mask and Safety helmet.</p> <p>c) Found 3 drivers from Sungei Rayat Estate still not attend hearing conservation training, this was not followed as per Noise Risk Assessment recommendation dated 22/6/2021.</p>		
<b>Corrections:</b>	<p>a) Reviewed the HIRARC accordingly (on ear plug and hazard category) for tractor drivers based on the NRA recommendation.</p> <p>b) Personal coaching given to the Tractor driver to ensure he wears the Safety Helmet, on the next day onwards.</p> <p>c) Immediately provided training to the 3 workers - on 17/02/2022.</p>		
<b>Root cause analysis:</b>	<p>a) Inadequate awareness and negligence by the PIC to update the HIRARC in timely manner.</p> <p>b) Lack of awareness by the tractor driver due to no accident happened which caused by not wearing safety helmet.</p> <p>c) Negligence by management, and improper follow-up on list of workers need to be trained.</p>		

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<b>Corrective Actions:</b>	<p>a) Briefing to PIC to ensure all HIRARC are reviewed accordingly upon new regulations enforced.</p> <p>b) All tractor drivers to be given refresher training on the importance use of safety helmet and other PPE. Tractor driver who are unable to follow instruction will be given warning letter by the management.</p> <p>c) Assistant Manager in charge shall maintain a proper listing on the name of workers (in &amp; out) who should involve in such of training in future, for better monitoring records.</p>
<b>Assessment Conclusion:</b>	CAP has been reviewed and satisfied. Effectiveness of the implementation will be review during the next ASA.
<b>Recert Verification</b>	As per verification on implementation of HIRARC on site visit and interview with workers found that all implementation was accordance to NRA, CHRA and HIRARC. Sample in GSRE, based on CHRA, JKKPHQ/12/ASS/00/309-2022/006 from QMSPRO Sdn Bhd the medical surveillance to be conduct, verification on Medical surveillance conducted in GSRE for Trunk Injection workers. Latest record was on 28/01/2022 for 4 workers at Klinik Moi. The result showed that all trunk injection was fit to work with chemical. Based on verification the Minor NC was close on 17/02/2023.

<b>Non-Conformity Report</b>			
<b>NCR Ref #:</b>	2167146-202202-N5	<b>Issue Date:</b>	17/02/2022
<b>Due Date:</b>	17/02/2023	<b>Date of Closure:</b>	17/02/2023
<b>Area/Process:</b>	Genting Ayer Item POM	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 4: 4.5.1.2 Minor
<b>Requirements:</b>	<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>		
<b>Statement of Nonconformity:</b>	The aspect and impact analysis were not covered all operations.		
<b>Objective Evidence:</b>	Sighted environmental aspect and impact (Doc No; SP-MGR-02-F01-0 rev: 02) reviewed on 7/11/2018. Found electrostatic precipitators already been operate since 2019 however no record of aspect and impact analysis for this machine.		
<b>Corrections:</b>	Updated the Environmental Aspect and Impact (EAI) for Electrostatic Precipitators (ESP) accordingly.		
<b>Root cause analysis:</b>	Lack of monitoring on the Environmental Aspect and Impact (EAI) requirements.		
<b>Corrective Actions:</b>	<p>Review the EAI at least yearly, and/or upon new projects, new machines, new devices are installed.</p> <p>Training on EAI requirements to the admin staffs and executives.</p>		



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<b>Assessment Conclusion:</b>	CAP has been reviewed and satisfied. Effectiveness of the implementation will be review during the next ASA.
<b>Assessment Verification:</b>	The Environmental Aspect and Impact (EAI) Assessment was revised dated 18/02/2022 - to include operations of ESP electrostatic precipitator. Training was made dated 23/09/2022 titled Environmental Aspects & Impacts attended by 14 participants. All documents were sighted and verified thus the NC was close on 17/02/2023.

Opportunity For Improvement			
<b>Ref:</b>	2167146-202202-I1	<b>Clause:</b>	MSPO 2530 Part 3 and 4: 4.4.5.12
<b>Area/Process:</b>	Genting Ayer Item POM and supply bases		
<b>Objective Evidence:</b>	Gender committee has been established by the management of each operating and has been verified based on organization chart, minutes meeting and interview with female workers. It can be further improved to include all female workers, female offices staff and female resident and dependent since it is one of the channels to communicate company policy and procedure.		
<b>Assessment Verification:</b>	Gender Committee minute meetings were made available to the audit team together with attendance form. Verification was made with the committee chairperson regarding on the committee members.		

### 3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
2307753-202302-M1	4.4.4.2 Part 3 Major	17/02/2023	Closed On 17/04/2023
2307753-202302-M2	4.5.3.3 Part 3 Major	17/02/2023	Closed On 17/04/2023
2307753-202302-N1	4.3.1.4 Part 3 Minor	17/02/2023	Open

### 3.5 Issues Raised by Stakeholders

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks:</b> <b>NUPW representative</b> They informed that no pending issue during the time of audit. They will discuss with the management if there is any issue reported. Workers are paying in accordance with Minimum Wage Order 2022.</p> <p><b>Management Response:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b></p>



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	Management has a good relationship with NUPW. No pending issues raised by both parties. No further issue.
2	<p><b>Feedbacks:</b>  <b>Worker’s representative</b></p> <p>The workers are satisfied with the management, and they informed that their wages have achieved Minimum Wage Order 2020. They are aware of the complaint procedure. No discrimination from the management.</p>
	<p><b>Management Response:</b>  Noted on the information.</p>
	<p><b>Audit Team Findings:</b>  No further issue.</p>
3	<p><b>Feedbacks:</b>  <b>Local Community Head (Kg Paya Mas)</b></p> <p>No issue raised by the community head. The community head admit they have a good relationship with the estate management.</p>
	<p><b>Management Response:</b>  Noted on the information.</p>
	<p><b>Audit Team verification and response:</b>  No further issue.</p>
4	<p><b>Feedbacks:</b>  <b>Contractors</b></p> <p>There is no late payment issue from estate to contractors. Agreement is valid and signed by both parties. Contractor workers’ pay slip were kept in office.</p>
	<p><b>Management Response:</b>  Noted on the information.</p>
	<p><b>Audit Team verification and response:</b>  No further issue.</p>
5	<p><b>Feedbacks:</b>  <b>Cattle owner</b></p> <p>The owner is aware of the estate condition and won’t let their cattle grazing at the replanting area. The management was maintaining a good relationship with the local community surrounding the estate compound.</p>
	<p><b>Management Response:</b>  Noted on the information.</p>
	<p><b>Audit Team verification and response:</b>  No further issue.</p>
6	<p><b>Feedbacks:</b>  <b>Contractors &amp; Supplier representative</b></p> <p>Both contractors and suppliers have a good relationship with the mill management. Both aware how to channel their complaint or grievances. No issue on late payment from the mill management.</p>

	<p><b>Management Response:</b> Noted on the information.</p> <p><b>Audit Team verification and response:</b> No further issue.</p>
<b>7</b>	<p><b>Feedbacks:</b>  <b>Local community (Head of Kg Sri Maju Jaya)</b>            No issues raised by the Ketua Kampung. He admitted that the mill management often invite local community for discussion.</p> <p><b>Management Response:</b> Noted on the information.</p> <p><b>Audit Team verification and response:</b> No further issue.</p>
<b>8</b>	<p><b>Feedbacks:</b>  <b>Villager (Kg Sri Maju Jaya)</b>            No issue from the villager towards the mill management. Everything is well managed.</p> <p><b>Management Response:</b> Noted on the information.</p> <p><b>Audit Team verification and response:</b> No further issue.</p>

### 3.6 List of Stakeholders Contacted

<p><b>Government Officer:</b> Nil</p>	<p><b>Community/neighbouring village:</b>            Representative from:            Kg Sri Maju Jaya            Kg Paya Mas            Cattle Owner</p>
<p><b>Suppliers/Contractors/Vendors:</b>            Ganes A/L Karuppanan            SRGD Enterprise</p>	<p><b>Worker's Representative/Gender Committee:</b>            Workers Representative            Gender Representative            Harvesters            Sprayers            Mill Operators</p>

**Section 4: Assessment Conclusion and Recommendation**

<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>		
<p>Based on the findings during the assessment Genting Plantations Berhad, Genting Ayer Item POM Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Genting Plantations Berhad, Genting Ayer Item POM Certification Unit is certified.</p>		
<b>Acknowledgement of Assessment Findings</b>	<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<p><b>Name:</b> Arunan Kandasamy</p>	<p><b>Name:</b> James Chung Khim Hon</p>	<p><b>Name:</b> Muhamad Naquiuddin Mazeli</p>
<p><b>Company name:</b> Genting Plantations Berhad</p>	<p><b>Company name:</b> Genting Plantations Berhad</p>	<p><b>Company name:</b> BSI Services (Malaysia) Sdn Bhd</p>
<p><b>Title:</b> Senior Vice President - Plantation (Malaysia)</p>	<p><b>Title:</b> Senior Vice President - Group Processing</p>	<p><b>Title:</b> Lead Auditor</p>
<p><b>Signature:</b>  <b>Date:</b> 19/04/2023</p>	<p><b>Signature:</b>  <b>Date:</b> 19/04/2023</p>	<p><b>Signature:</b>  <b>Date:</b> 19/04/2023</p>

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

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

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	A policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	Genting Plantations Berhad has established MSPO Policy signed by the President and Chief Operating Officer, Mr Yong Chee Kong dated 01/07/2015. Stated in the policy that management is committed to the 3 pillars of sustainable development which are people, planet and profit. The management also endeavor to established and maintain an effective sustainability management system and to ensure compliance with MSPO and MPOB code of practices requirement.  The policy was communicated to the employee through training, briefing and displayed on notice board at several strategic places in the operating unit. For Genting Sri Gading Estate, communication on the policy has been done on 15/01/2022 during the muster call briefing by Mr Murali.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. <b>- Major compliance -</b>	Stated in the MSPO policy that has been established that the management is committed to continue to assess and develop new and innovative techniques, approaches and practices with the objective of continuous improvement in our journey towards achieving sustainable palm oil.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	Internal audit already been planned by the HQ level and conducted accordingly. Record for Genting Tanah Merah Estate was available dated 27 – 28/12/2022 by P. Sivaji Raja (Sr. Manager – Sustainability). There 1 OFI been raised under 4.4.3.5. In GSGE, Internal audit conducted on 12-13/01/2023 by P.Sivaji. There are 1 finding been raised. GSRE, conducted internal audit dated 21-23/12/2022 by P.Sivaji Raja. Genting Plantations Berhad has established SOP for Sustainability Internal Audit documented in Sustainability Management Procedure Manual, Sustainability Internal Audit. Refer doc. no. SMP-GPB-03, rev. 05 dated 09/2020. Internal audit results for all operating units has been documented in the document title "RSPO, MSPO & ISCC Internal audit report" and has been made available for each operating unit.	Complied
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. <b>- Major compliance -</b>	Genting Plantations Berhad has established SOP for Sustainability Internal Audit documented in Sustainability Management Procedure Manual, Sustainability Internal Audit. Refer doc. no. SMP-GPB-03, rev. 05 dated 09/2020.	Complied
<b>4.1.2.3</b>	Report shall be made available to the management for their review. <b>- Major compliance -</b>	Internal audit results for all operating units has been documented in the document title "RSPO, MSPO & ISCC Internal audit report" and has been made available for each operating unit.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for	Management review has been done for all operating units under southern region on 16/01/2023 at Genting Sri Gading Estate. Agenda	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>effective implementation of MSPO and decide on any changes, improvement and modification.</p> <p><b>- Major compliance -</b></p>	<p>that has been discussed during the meeting any previous or outstanding issues, changes and improvement on sustainability management systems, complaint and grievances, etc. Meeting minutes was available where the agenda that discussed as below:</p> <ol style="list-style-type: none"> <li>1. Results of internal audits covering RSPO, MSPO &amp; SCCS</li> <li>2. Process performance and product conformity</li> <li>3. Customer feedback</li> <li>4. Status of preventive and corrective actions</li> <li>5. Follow-up actions from management reviews</li> <li>6. Changes that could affect the management system</li> <li>7. Recommendations for improvement</li> <li>8. Improvement of the effectiveness of the management system and processes</li> <li>9. Complaint and grievances</li> <li>10. Resources needs</li> </ol>	
<p><b>Criterion 4.1.4 – Continual Improvement</b></p>			

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><b>- Major compliance -</b></p>	<p>The estates had established management plan for the continuous improvement among others as described below compiled based on the social and environmental concerns. Review date made in Jan and Feb annually subject to estates requirement and need.</p> <p>a) Reduction in use of pesticides</p> <p>The estate adopted several continuous improvements in reducing of pesticides i.e. increasing planting of beneficial plants mainly <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i>.</p> <ul style="list-style-type: none"> <li>- The estate also adopted planting of <i>Leguminious</i> Cover Crop mainly <i>Pueraria Javanica</i> and <i>Calopogonium Mucunoides</i> at replanting area to minimize circle and selective weeding.</li> <li>- Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced encouraging soft grasses in inter row and frond stacking area.</li> <li>- Mills wastes such as EFB were used as fertilizer in the selected fields where the application is economically viable.</li> </ul> <p>b) Environmental impacts</p> <p>Environmental impact assessment, management action plans and continuous improvement plans for the estate has been updated and monitored by management. Among others the improvement actions:</p> <ul style="list-style-type: none"> <li>- Construction of sump at chemical and workshop to prevent ground or water contamination.</li> <li>- Collect back chemicals bags and allocate store for control of misused.</li> <li>- Use of tray for tractor parking to prevent ground contamination.</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																				
		<p>c) Waste reduction                      The management had planned to reduce emission by daily inspection and monitoring for their farm tractors/ lorries to prevent any leakage and problem which can impact on smoke emission.</p> <p>d) Pollution and greenhouse gas (GHG) emissions                      The management of the estate had plan to reduce emission by daily inspection and monitoring for their farm tractors/ lorries to prevent any leakage and problem which can impact on smoke emission.</p> <p>e) Optimising the yield of the supply base.                      The yield performance has always been the top priority in ensuring long-term economic and financial viability. In general, various efforts to optimise the yield of the plantation among others</p> <ul style="list-style-type: none"> <li>- Maximizing crop recovery,</li> <li>- Optimum ripeness standard (harvest ripe bunches only and 100% loose fruit collection),</li> <li>- The soil fertility was maintained and planting only high yielding planting material</li> </ul> <p>Others improvement and enhancement program as shown below.</p> <table border="1"> <thead> <tr> <th></th> <th>OU</th> <th>Section</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>GSRE</td> <td>Social</td> <td>Multi-Purpose Hall Upgrading 2023 RM 20K</td> </tr> <tr> <td>2</td> <td>GSRE</td> <td>Social</td> <td>Upgrading workers quarters 2023 RM100K</td> </tr> <tr> <td>3</td> <td>GSRE</td> <td>Environmental</td> <td>Solar street light estate complex 2023 RM6K</td> </tr> <tr> <td>4</td> <td>GSRE</td> <td>Operation</td> <td>Motorized cutter 3 units 2023 RM12K</td> </tr> </tbody> </table>		OU	Section	Details	1	GSRE	Social	Multi-Purpose Hall Upgrading 2023 RM 20K	2	GSRE	Social	Upgrading workers quarters 2023 RM100K	3	GSRE	Environmental	Solar street light estate complex 2023 RM6K	4	GSRE	Operation	Motorized cutter 3 units 2023 RM12K	
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Criterion / Indicator		Assessment Findings				Compliance	
		5	GSRE	Operation	Road Grading/ Compacting 2023 - RM100K		
		1	GTME	Social	Multi Purpose Hall 2023 RM 25K		
		2	GTME	Social	Upgrading workers quarters 2 years RM200K		
		3	GTME	Social	Induction centre hall workers RM15K		
		4	GTME	Social	Upgrading surau 2023 RM25K		
		5	GTME	Environmental	Solar street light for complex 2023 RM15K		
		6	GTME	Operation	Motorized cutter 2 units 2023 RM10K		
		7	GTME	Social	2 new shop upgrading 2024 - RM100K		
		1	GSGE	Social	Upgrading workers quarters 4 years RM100K		
		2	GSGE	Environmental	Solar street light estate complex 2023 RM8K		
		3	GSGE	Operation	Motorized cutter 5 units 2023 RM15K		
		4	GSGE	Operation	Road Grading/ Compacting 2023 - RM50K		
		5	GSGE	Operation	Flood mitigation project 2023 - RM500K		
<b>4.1.4.2</b>	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. <b>- Major compliance -</b>	This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the GM and higher Head Of Department are transacted during the monthly Managers meetings					Complied

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Criterion / Indicator		Assessment Findings	Compliance
		and emails. Provision of machine and other major requirement are made in CAPEX budget.	
<b>4.1.4.3</b>	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. <b>- Major compliance -</b>	Where introduction of new machines and new work method, all level of employees will be trained to handle /implement the new techniques and work changes. Monitoring is made by the Estate Managers and Assistants throughout the on-the-job training and familiarization.	Complied
<b>4.2 Principle 2: Transparency</b>			
<b>Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements</b>			
<b>4.2.1.1</b>	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. <b>- Major compliance -</b>	Genting Plantations Berhad has developed a Procedure on Requests & Response, document no: SMP-GPB-25, rev no: 00, dated 14/08/2014 where the objective of the procedure is to define management responsibilities to respond constructively and promptly to the information requested by the stakeholders with sufficient objective evidence.  Stakeholders will have the information available in appropriate forms and to allow stakeholders participation in decision making in these areas. Estate manager shall seek approval from Head of Sustainability Department or his HOD prior releasing any confidential or sensitive information.	Complied
<b>4.2.1.2</b>	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. <b>- Major compliance -</b>	The management of Genting Plantations Berhad has established internal procedure for transparency and has been documented in the document title "Transparency" document number SQD/SMS/1.0 dated 01/08/2020. The procedure has outlined the person responsible for transparency, types of information/documents that can be request, and the mechanism to request any information or document.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Among the information allowed to be made available to the public are as follow:</p> <ul style="list-style-type: none"> <li>a. Land grant</li> <li>b. Policies</li> <li>c. Reports; Environmental Aspect Impact Report, Social Impact Assessment, stakeholder minute meeting, HCV report</li> <li>d. Management Plan; Pollution Prevention Plan, Continual Improvement Plan, Safety &amp; Health Plan</li> <li>e. Procedure: Complaint &amp; Grievances, Negotiation &amp; Compensation Procedure, Sexual Harassment Procedure.</li> </ul>	
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has developed a Procedure on Complaint &amp; Communication, document no: SMP-GPB-17, rev no: 02, dated 23/02/2018 where the objective of the procedure is to ensure internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties.</p>	Complied
<b>4.2.2.2</b>	<p>A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.</p> <p><b>- Minor compliance -</b></p>	<p>Chief clerk of each operating units was appointed as the person in charge for communication and grievances.</p>	Complied
<b>4.2.2.3</b>	<p>List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.</p> <p><b>- Major compliance -</b></p>	<p>List of stakeholders has been maintained by each operating unit and has been classified into 2 categories which are external and internal stakeholders. For internal stakeholders, listed such as contractor, grocery store, workers representative and supplier while for external,</p>	Complied

	Criterion / Indicator	Assessment Findings	Compliance
		it has been listed smallholders, NGOs, government bodies and local communities.	
<b>Criterion 4.2.3 – Traceability</b>			

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<p><b>4.2.3.1</b></p>	<p>The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). <b>- Major compliance -</b></p>	<p>An SOP has been established SOP for traceability and documented in Genting Plantations Berhad, Sustainable Management Procedure Manual SMP-GPB-33 revision 00 dated Sept 2020: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability. Therein describing information of FFB flow chart from harvesting designated block to mill weighbridge (tickets). Extracted samples of the weighbridge records as follows.</p> <table border="1"> <thead> <tr> <th></th> <th></th> <th>Date</th> <th>Pass No</th> <th>Quantity</th> <th>Destination</th> </tr> </thead> <tbody> <tr><td>1</td><td>GTME</td><td>13/11/22</td><td>10337</td><td>19.300</td><td>GAIPOM</td></tr> <tr><td>2</td><td>GTME</td><td>14/11/22</td><td>10345</td><td>22.910</td><td>GAIPOM</td></tr> <tr><td>3</td><td>GTME</td><td>02/12/22</td><td>10407</td><td>21.630</td><td>GAIPOM</td></tr> <tr><td>4</td><td>GTME</td><td>26/09/22</td><td>10140</td><td>28.710</td><td>GAIPOM</td></tr> <tr><td>5</td><td>GTME</td><td>04/01/22</td><td>8928</td><td>31.720</td><td>GAIPOM</td></tr> <tr><td colspan="6"> </td></tr> <tr><td>1</td><td>GSGE</td><td>30/06/22</td><td>2189</td><td>13.310</td><td>GAIPOM</td></tr> <tr><td>2</td><td>GSGE</td><td>31/07/22</td><td>2621</td><td>16.670</td><td>GAIPOM</td></tr> <tr><td>3</td><td>GSGE</td><td>31/08/22</td><td>3032</td><td>11.850</td><td>GAIPOM</td></tr> <tr><td>4</td><td>GSGE</td><td>30/09/22</td><td>3427</td><td>12.429</td><td>GAIPOM</td></tr> <tr><td>5</td><td>GSGE</td><td>31/10/22</td><td>3885</td><td>10.280</td><td>GAIPOM</td></tr> <tr><td>6</td><td>GSGE</td><td>30/11/22</td><td>4280</td><td>12.800</td><td>GAIPOM</td></tr> <tr><td>7</td><td>GSRE</td><td>31/12/22</td><td>4627</td><td>12.970</td><td>GAIPOM</td></tr> <tr><td colspan="6"> </td></tr> <tr><td>1</td><td>GSRE</td><td>07/02/23</td><td>0183</td><td>13.970</td><td>GAIPOM</td></tr> <tr><td>2</td><td>GSRE</td><td>07/02/23</td><td>0182</td><td>14.230</td><td>GAIPOM</td></tr> <tr><td>3</td><td>GSRE</td><td>31/01/23</td><td>0148</td><td>12.870</td><td>GAIPOM</td></tr> <tr><td>4</td><td>GSRE</td><td>31/01/23</td><td>0150</td><td>14.460</td><td>GAIPOM</td></tr> <tr><td>5</td><td>GSRE</td><td>28/01/23</td><td>0126</td><td>14.830</td><td>GAIPOM</td></tr> <tr><td>6</td><td>GSRE</td><td>28/01/23</td><td>0128</td><td>14.990</td><td>GAIPOM</td></tr> <tr><td>7</td><td>GSRE</td><td>26/12/22</td><td>2467</td><td>14.820</td><td>GAIPOM</td></tr> </tbody> </table>			Date	Pass No	Quantity	Destination	1	GTME	13/11/22	10337	19.300	GAIPOM	2	GTME	14/11/22	10345	22.910	GAIPOM	3	GTME	02/12/22	10407	21.630	GAIPOM	4	GTME	26/09/22	10140	28.710	GAIPOM	5	GTME	04/01/22	8928	31.720	GAIPOM							1	GSGE	30/06/22	2189	13.310	GAIPOM	2	GSGE	31/07/22	2621	16.670	GAIPOM	3	GSGE	31/08/22	3032	11.850	GAIPOM	4	GSGE	30/09/22	3427	12.429	GAIPOM	5	GSGE	31/10/22	3885	10.280	GAIPOM	6	GSGE	30/11/22	4280	12.800	GAIPOM	7	GSRE	31/12/22	4627	12.970	GAIPOM							1	GSRE	07/02/23	0183	13.970	GAIPOM	2	GSRE	07/02/23	0182	14.230	GAIPOM	3	GSRE	31/01/23	0148	12.870	GAIPOM	4	GSRE	31/01/23	0150	14.460	GAIPOM	5	GSRE	28/01/23	0126	14.830	GAIPOM	6	GSRE	28/01/23	0128	14.990	GAIPOM	7	GSRE	26/12/22	2467	14.820	GAIPOM	<p>Complied</p>
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4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	The estates monitor 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. Other records include daily FFB harvested and dispatched and summary in the monthly yield statistics. The daily despatch to the mill is checked vs the received with the monitoring of the weight differences.	Complied																																				
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. <b>- Minor compliance -</b>	<p>The PIC for traceability management is appointed as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>PIC M/s</th> <th>Position</th> <th>Date</th> <th>Issued by</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>GTME</td> <td>Md Faizal Abu</td> <td>Asst Manager</td> <td>02/02/23</td> <td>Manager</td> </tr> <tr> <td>2</td> <td>GTME</td> <td>N Nabila Abidin</td> <td>WB clerk</td> <td>02/02/23</td> <td>Manager</td> </tr> <tr> <td>3</td> <td>GSRE</td> <td>Murali Manikam</td> <td>Asst Manager</td> <td>01/01/23</td> <td>Sr Manager</td> </tr> <tr> <td>4</td> <td>GSGE</td> <td>Syuhaidah Kaasim</td> <td>WB clerk</td> <td>01/01/23</td> <td>Sr Manager</td> </tr> <tr> <td>5</td> <td>GSRE</td> <td>Faiz Zulkiflee</td> <td>Sr Asst Mgr</td> <td>08/01/22</td> <td>Sr Manager</td> </tr> </tbody> </table> <p>Duties among others include the following:</p> <ul style="list-style-type: none"> <li>a) To ensure quality and environmental systems</li> <li>b) To ensure test equipment is in order and functional</li> <li>c) To ensure products meet customers targets and quality</li> <li>d) To ensure all requirement in SCCS are complied with.</li> </ul> <p>All appointed letters were sighted and verified.</p>		Estate	PIC M/s	Position	Date	Issued by	1	GTME	Md Faizal Abu	Asst Manager	02/02/23	Manager	2	GTME	N Nabila Abidin	WB clerk	02/02/23	Manager	3	GSRE	Murali Manikam	Asst Manager	01/01/23	Sr Manager	4	GSGE	Syuhaidah Kaasim	WB clerk	01/01/23	Sr Manager	5	GSRE	Faiz Zulkiflee	Sr Asst Mgr	08/01/22	Sr Manager	Complied
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4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. <b>- Major compliance -</b>	The FFB weighbridge ticket/despatch notes are produced for all transaction to Ayer Item Palm Oil Mill. The set of document consists of the following information among others. As per sample in 4.2.3.1 the record of sales and delivery was available as per below information was verified:	Complied																																				

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		<ul style="list-style-type: none"> <li>- Date/ D/O no/ Quantity/ w/bridge operator name</li> <li>- Total Bunches/ Quality/ field no</li> <li>b) Despatch chit               <ul style="list-style-type: none"> <li>- Serial no/ field no/ no of bunches/ tractor no.</li> </ul> </li> <li>c) Delivery Note               <ul style="list-style-type: none"> <li>- Date/ weight/ w/bridge operator/ MPOB licence no.</li> </ul> </li> <li>d) Grading report for the FFB consignment.</li> </ul>																																		
<b>4.3 Principle 3: Compliance to legal requirements</b>																																				
<b>Criterion 4.3.1 – Regulatory requirements</b>																																				
<b>4.3.1.1</b>	<p>All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p><b>- Major compliance -</b></p>	<p>The estates continued to comply with legal requirements. Compliance to each applicable law and regulation is monitored by estate management, Regional Office and Sustainability Department. The licenses and permits governed by the Local, State and Federal authorities among others as shown below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>License / Permits</th> <th>Validity/ref</th> </tr> </thead> <tbody> <tr> <td></td> <td>Genting Tanah Merah Estate</td> <td></td> </tr> <tr> <td>1</td> <td>CF DOSH air compressor-JH PMT 17439</td> <td>Pending</td> </tr> <tr> <td>2</td> <td>KPDNKK ref J005032 - diesel 13650 L</td> <td>10/10/24</td> </tr> <tr> <td>2</td> <td>KPDNKK ref 39/20/PD - diesel 8000 L</td> <td>26/08/23</td> </tr> <tr> <td>3</td> <td>JTK Permit Potongan Gaji Pekerja TKNJU-21</td> <td>Eff 9/3/21</td> </tr> <tr> <td>4</td> <td>Meteorology Corporation A 15226290 60 mt</td> <td>10/06/23</td> </tr> <tr> <td>5</td> <td>Meteorology Corporation A 15226290 50 mt</td> <td>23/05/23</td> </tr> <tr> <td>6</td> <td>Lesen utk Menggaji Pekerja Bkn Pemastautin</td> <td>Eff 31/1/23</td> </tr> <tr> <td>7</td> <td>MPOB License 61177300-2000</td> <td>31/05/23</td> </tr> <tr> <td>8</td> <td>MPOB License 60912200-2000</td> <td>29/04/24</td> </tr> </tbody> </table>		License / Permits	Validity/ref		Genting Tanah Merah Estate		1	CF DOSH air compressor-JH PMT 17439	Pending	2	KPDNKK ref J005032 - diesel 13650 L	10/10/24	2	KPDNKK ref 39/20/PD - diesel 8000 L	26/08/23	3	JTK Permit Potongan Gaji Pekerja TKNJU-21	Eff 9/3/21	4	Meteorology Corporation A 15226290 60 mt	10/06/23	5	Meteorology Corporation A 15226290 50 mt	23/05/23	6	Lesen utk Menggaji Pekerja Bkn Pemastautin	Eff 31/1/23	7	MPOB License 61177300-2000	31/05/23	8	MPOB License 60912200-2000	29/04/24	Complied
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		9	MPOB License 55991670-1000	28/02/26	
		10	MPOB License 51381400-2000	30/06/23	
		11	MPOB License 53806501-1000 - Nursery	31/03/23	
			Genting Sg Rayat Estate		
		1	Permit Potongan Daripada Gaji pekerja, Sek 24	Eff 10/01/18	
		2	MPOB License 508590202000	30/04/23	
		3	MPOB License 501298102000	31/03/23	
		4	Meteorology Corporation B 1742942 50 mt	19/09/23	
		5	KPDNKK 10000 L ref J 005602	14/11/24	
		6	KPDNKK 10000 L ref J 003055	18/08/23	
			Genting Sri Gading Estate		
		1	CF DOSH air compressor-JH PMT 187478	07/12/23	
		2	Permit Potongan Daripada Gaji pekerja, Seksyen	Ref 07/02/35/	
		3	MPOB License 524435102000	31/10/23	
		4	MPOB License 50859292000	30/04/23	
		5	MPOB License 508842111000	30/06/23	
		6	Meteorology Corporation B 1742941 60 mt	19/09/23	
		7	KPDNKK ref PJ000319 Diesel 36000L	27/03/24	
<b>4.3.1.2</b>	The management shall list all laws applicable to their operations in a legal requirements register. <b>- Major compliance -</b>	The Legal Requirements Register (LRR) covers all the necessary regulatory requirements. The LRR for was reviewed annually. The list of applicable legal and other requirements was made available during the assessment and complied in the Sustainability Management Procedure Manual SMP-GPB-22 having revision no. 6. The list comprises of the following sections a) Environment/ Safety & Health/ Social		Complied	



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		b) Best practices & other requirements c) International Standards Requirement Among others the identified applicable laws and regulations relevant to its operations included the. a) Environmental Quality Act 1974 and its Regulations b) Factories and Machinery Act 1967 and its Regulations c) Occupational Safety and Health Act 1994 and its Regulations d) Pesticides Act, 1974 e) Worker’s Minimum Standards Housing & Amenities Act, 1990 f) Wildlife conservation Act 2010 g) Malaysian Palm Oil Board 1998 h) Holiday Act 1951 i) Land Ordinance (Amended Ordinance) j) Forest Enactment 1968 (Sabah No 2 of 1968) k) Native Courts Ordinance 1992 l) Passport Act 1966 / Workers Union Act 1959 m) Estate Hospital Assistants (Registration) Act 1965 n) Petroleum (safety Measures) Act 1984 o) Fire Services Act 1984 p) Uniform Building By Laws 1986 q) Weights And Measures Act 1972 (Act 71) (Amendment 1981) r) Minimum Wages Order 2020 s) Drainage and Irrigation Ordinance 1956 t) EIA Order 2005 / Wildlife Conservation Enactment 1997	

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Criterion / Indicator		Assessment Findings	Compliance												
		<ul style="list-style-type: none"> <li>u) Employment Insurance Scheme Act 2017</li> <li>v) Windfall Profit Levy OP Amendment Order 2021</li> <li>w) Employment (Amendment) Act 2022</li> <li>x) Min Wages Order 2022</li> </ul>													
<b>4.3.1.3</b>	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p><b>- Major compliance -</b></p>	<p>The Sustainability Department (SD), based at Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills. SD which is based in <i>Wisma Genting</i> is responsible for tracking any changes to the Acts and Regulations. In addition, the SVP Processing (Malaysia) also played a role in disseminating new Acts &amp; Regulations to all the estates in the Group.</p> <ul style="list-style-type: none"> <li>a) This was made via communication with the publisher of the documents.</li> <li>b) This mechanism was outlined in the procedure.</li> <li>c) The updating of the legal register is made on a periodical basis.</li> <li>d) Changes in the legal register if any are communicated to the respective regions.</li> <li>e) The mill had entirely adopted the GPB established documented system for identifying, tracking, accessing and updating the legal requirements. It had ensured that all applicable legal requirements pertaining to MSPO are established, implemented and maintained. The latest revision on the LRR was made dated 27/05/2022 on the following changes;</li> </ul> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Rev date</th> <th>Title</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>27/05/22</td> <td>Min Wages Order 2022</td> <td>Newly added</td> </tr> <tr> <td>2</td> <td>27/05/22</td> <td>Employment (Amendment) Act 2022</td> <td>Revision</td> </tr> </tbody> </table>		Rev date	Title	Remarks	1	27/05/22	Min Wages Order 2022	Newly added	2	27/05/22	Employment (Amendment) Act 2022	Revision	Complied
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		3	27/05/22	Windfall Profit Levy OP Amendment Order 2021	Revision																	
<b>4.3.1.4</b>	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p><b>- Minor compliance -</b></p>	<p>The Estate Managers appoint the Chief Clerks as the PIC for updating changes in laws at the estates. Respective letters as follows were sighted and verified.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>PIC</th> <th>Date of appointment</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>GPB Tanah Merah</td> <td>Chief Clerk</td> <td>08/01/2021</td> </tr> <tr> <td>2</td> <td>GPB Sg Rayat</td> <td>Chief Clerk</td> <td>01/01/2023</td> </tr> <tr> <td>3</td> <td>GPB Sri Gading</td> <td>Chief Clerk</td> <td>08/01/2022</td> </tr> </tbody> </table> <p>There were 2 units of air compressor (PMT 14835 and PMT 15784) in GPB Sg Rayat Estate having the CF expired on 10/11/22. Renewal to DOSH was made dated 16/11/22. The monitoring of compliance was not effective hence an NCR have been raised.</p>					Estate	PIC	Date of appointment	1	GPB Tanah Merah	Chief Clerk	08/01/2021	2	GPB Sg Rayat	Chief Clerk	01/01/2023	3	GPB Sri Gading	Chief Clerk	08/01/2022	Minor Non compliance
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<b>Criterion 4.3.2 – Lands use rights</b>																						
<b>4.3.2.1</b>	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p><b>- Major compliance -</b></p>	<p>The management ensure that their oil palm cultivation activities do not diminish the land use rights of other users by ensuring the legal boundary is correct through land survey during the development. There is no land dispute raised by any stakeholder at the point of this assessment.</p>				Complied																
<b>4.3.2.2</b>	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p><b>- Major compliance -</b></p>	<p>Quit rent paid by the estate management to the government authority as below:</p> <p>Quit rent for Tanah Merah Estate was paid to Pejabat Tanah Tangkak, dated on 17/01/2022 amounted RM298,936. For year 2023, the payment was yet processed.</p>				Complied																

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		<p>Quit rent for Sri Gading Estate was paid to Pejabat Tanah Batu Pahat, dated on 01/05/2022 amounted RM111,315. For year 2023, the payment was yet processed.</p> <p>Quit rent for Sungei Rayat Estate was paid to Pejabat Tanah Batu Pahat, dated on 18/05/2022 amounted RM416,204. For year 2023, the payment was yet processed.</p>																																																																					
<b>4.3.2.3</b>	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p><b>- Major compliance -</b></p>	<p>The estates have installed boundary markers/trenches/signage as sighted during the visit to the fields. This confirmed that they have visibly maintained and demarcated the boundary markers via installing the red/white pole and signage.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Estate</th> <th>Location</th> <th>Boundary neighbours</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>GPB Sri Gading</td> <td>OP99B/04B</td> <td>Kg Rahmat</td> </tr> <tr> <td>2</td> <td>GPB Sri Gading</td> <td>OP2018B</td> <td>Hutan Bkt Soga</td> </tr> <tr> <td>3</td> <td>GPB Sri Gading</td> <td>OP19C/21E</td> <td>Smallholder</td> </tr> <tr> <td colspan="4"> </td> </tr> <tr> <td>4</td> <td>GPB Tanah Merah</td> <td>OP00A</td> <td>Sri Maha Temple</td> </tr> <tr> <td>5</td> <td>GPB Tanah Merah</td> <td>OPR22D</td> <td>Kg Orang Asli</td> </tr> <tr> <td>6</td> <td>GPB Tanah Merah</td> <td>OPR21B</td> <td>Bandar Baru Tangkak</td> </tr> <tr> <td>7</td> <td>GPB Tanah Merah</td> <td>OP95A</td> <td>Ldg Ang Kee</td> </tr> <tr> <td>8</td> <td>GPB Tanah Merah</td> <td>OP21B</td> <td>Ldg Tangkah</td> </tr> <tr> <td colspan="4"> </td> </tr> <tr> <td>9</td> <td>GPB Sg Rayat</td> <td>OP19C</td> <td>Kg Sri Wangi</td> </tr> <tr> <td>10</td> <td>GPB Sg Rayat</td> <td>OP19A</td> <td>FELCRA Sg Wangi</td> </tr> <tr> <td>11</td> <td>GPB Sg Rayat</td> <td>OP18C</td> <td>Bindu Recerve Forest</td> </tr> <tr> <td>12</td> <td>GPB Sg Rayat</td> <td>OP15A</td> <td>Kg Parit Yaani</td> </tr> <tr> <td>13</td> <td>GPB Sg Rayat SMD</td> <td>OP98B</td> <td>Smallholder</td> </tr> <tr> <td>14</td> <td>GPB Sg Rayat SMD</td> <td>OP19A</td> <td>Smallholder</td> </tr> </tbody> </table>		Estate	Location	Boundary neighbours	1	GPB Sri Gading	OP99B/04B	Kg Rahmat	2	GPB Sri Gading	OP2018B	Hutan Bkt Soga	3	GPB Sri Gading	OP19C/21E	Smallholder					4	GPB Tanah Merah	OP00A	Sri Maha Temple	5	GPB Tanah Merah	OPR22D	Kg Orang Asli	6	GPB Tanah Merah	OPR21B	Bandar Baru Tangkak	7	GPB Tanah Merah	OP95A	Ldg Ang Kee	8	GPB Tanah Merah	OP21B	Ldg Tangkah					9	GPB Sg Rayat	OP19C	Kg Sri Wangi	10	GPB Sg Rayat	OP19A	FELCRA Sg Wangi	11	GPB Sg Rayat	OP18C	Bindu Recerve Forest	12	GPB Sg Rayat	OP15A	Kg Parit Yaani	13	GPB Sg Rayat SMD	OP98B	Smallholder	14	GPB Sg Rayat SMD	OP19A	Smallholder	Complied
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<b>4.3.2.4</b>	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - <b>Minor compliance</b> -	There is no land dispute in sampled estates at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified. Verified there was no land disputes during phone call interview with the stakeholders.	Not applicable
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - <b>Major compliance</b> -	There is no customary land or negotiated agreements at all the sampled estates.	Not applicable
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - <b>Minor compliance</b> -	There is no customary land or negotiated agreements at all the sampled estates.	Not applicable
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - <b>Major compliance</b> -	There is no customary land or negotiated agreements at all the sampled estates.	Not applicable
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - <b>Minor compliance</b> -	SIA was made available to the audit team. The assessment was conducted by Sustainability Department, dated on 28/01/2020 and will be revised every 5 years. The objectives of the assessment were; a. To assess change in social and environmental conditions, which	Complied

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		<p>subsequently have impacts on people.</p> <p>b. To access compliance on human rights against company policy and RSPO requirement.</p> <p>SIA was conducted every 5 year and reviewed on annual basis. It can be further improved to capture any new changes in social and environmental conditions which subsequently have impacts or risks on surrounding communities.</p>	
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p><b>- Major compliance -</b></p>	<p>SOP for complaint and grievances was developed and revised on 13/05/2022, document no: SMP-GPB-19. The SOP outlined the system for dealing with complaint and grievances.</p>	Complied
<b>4.4.2.2</b>	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p><b>- Major compliance -</b></p>	<p>The estates are having a format to record complaints or requests from the stakeholders. Based on the records, all the complaints were lodged by internal stakeholders and generally about defects of housing facility, and request of facility (e.g. transport to town, extension of electricity supply). Latest complaint was recorded on 10/02/2023, resolved on the same day.</p>	Complied
<b>4.4.2.3</b>	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p><b>- Minor compliance -</b></p>	<p>The complaint forms were available at the operating unit's office, where the stakeholders can easily access should it be needed. Among the information available in the form is name of requestor/ complainant, date of request, details of complaint/ grievance, details of action taken including dates and acknowledgement signature of the requestor.</p>	Complied
<b>4.4.2.4</b>	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p>	<p>Interview with internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure,</p>	Complied

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	- <b>Minor compliance</b> -	and they had been briefed by the management during stakeholder meeting.	
<b>4.4.2.5</b>	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - <b>Major compliance</b> -	The complaints and resolutions for the past 24 months (i.e. from January 2020) were well maintained by the sampled estates and available upon request.	Complied
<b>Criterion 4.4.3:</b> Commitment to contribute to local sustainable development			
<b>4.4.3.1</b>	Growers should contribute to local development in consultation with the local communities. - <b>Minor compliance</b> -	Operating unit has actively engaged with the stakeholders by inviting them to participate any social activities such as festival celebration. This has verified by interview with the stakeholders. The stakeholders informed that they have seek advice from the management regarding some of the operation issue.	Complied
<b>Criterion 4.4.4:</b> Employees safety and health			
<b>4.4.4.1</b>	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - <b>Major compliance</b> -	The Occupational Safety and Health Policy was established, signed by President and Chief Operating Officer on 01/07/2015. The policy was communicated during Policy briefing from time to time. The policy was displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH personnel from Head Office. 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. In interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the policy. The latest briefing was on 02/12/2022 by Mr P. Sivaji.	Complied

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<p><b>4.4.4.2</b> The occupational safety and health plan shall cover the following:</p> <ul style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risks of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</li> <li>d) all employees involved shall be adequately trained on safe working practices</li> <li>e) all precautions attached to products shall be properly observed and applied</li> <li>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).</li> <li>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.</li> <li>h) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of</li> </ul>	<ul style="list-style-type: none"> <li>a) The safety and health policy have been communicated and implemented as per below record training :- GTME: 02/12/2022 GSGE: 06/01/2023 GSRE: 01/02/2023</li> <li>b) In GTME, the assessment of Noise Risk Assessment already conducted 15/05/2021 by Allied Chemists Laboratory Sdn Bhd. The result show that tractor driver, blower and grabber. In HIRARC dated 08/02/2023 also already updated the risk and hazard and action to be taken recommendation from NRA.  For GSGE, the chemical hazard risk assessment (CHRA) conducted by QMSPRO Sdn Bhd as per report JKKPHQ/12/ASS/00/309-2022/005 dated 16/3/2022. Another risk was Noise Risk Assessment (NRA) dated 8/6/2021 (Reg. Report: JH/05/04/116) by Allied Chemists. From the NRA recommendation the management need to conducted hearing conservation training once a year and to submit workers for audiometric test yearly base. The workers that need use haring protection was: <ul style="list-style-type: none"> <li>• Workers operating motorized cutter</li> <li>• Farm Tractor driver</li> <li>• Mini tractor driver</li> <li>• workshop</li> </ul> </li> </ul> <p>For GSRE, the noise already been taking assessment as part of risk. The NRA conducted by Allied Chemist Laboratory Sdn Bhd (JH0504166) dated 22/06/2021. The result showed that all tractor and workshop attendant need to send for audiometric test yearly</p>	<p>Major Non compliance</p>



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<p>trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>i) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee’s health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>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><b>- Major compliance -</b></p>	<p>basis. There also CHRA, JKKPHQ/12/ASS/00/309-2022/006 from QMSPRO Sdn Bhd.</p> <p>Medical surveillance conducted in GSRE for Trunk Injection workers. Latest record was on 28/01/2022 for 4 workers at Klinik Moi. The result showed that all trunk injection was fit to work with chemical.</p> <p>In GTME, found 1 worker was not wearing earplug during driving the tractor, as per verification the driver (shanker) was one of 3 person who is affected with hearing loss as per audiometric test report dated 8/3/2022. The management already conducted the hearing conservation training on 8/3/2022, however 3 persons included the affected (shanker) was not attend the training. This was not followed as per NRA dated 15/5/2021.</p> <p>In GSGE, the management already send the workers for audiometric test at Poliklinik Intan (RZ Intan Medicare Sdn Bhd) with total workers 26 peoples. However, found workers under workshop and small tractor was not sent for audiometric test not followed as per Noise Risk Assessment (NRA) dated 8/6/2021 (Reg. Report: JH/05/04/116) by Allied Chemists.</p> <p>Found in all estate, The JKKP 7 record was not included in the JKKP 8 during submission. The JKPP 8 that been review was:</p> <p>GTME: JKKP8/132849/2022  GSGE: JKKP8/127650/2023  GSRE: JKKP8/127415/2022</p> <p>Record JKKP 7 review:-  GTME: 03/06/2022 &amp; 08/03/2022</p>	

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		<p>GSGE: 03/02/2022 GSRE: 10/02/2022 Thus, Major NC has been raised.</p> <p>c) The awareness training has been conducted based on the training need and analysis 2022/23. The training for safety have been conducted as per below:</p> <p><u>GTME</u> Hearing conservation training conducted on 08/03/2022 Safety and Health Policy training dated on 02/12/2022 First Aid training dated on 26/3/2022 Fire drill training dated 10/2/2022 Basic Occupational First aid, CPR, &amp; AED training dated 29/09/2021</p> <p><u>GSGE</u> Fire drill training dated 29/12/2022 Hearing conservation training dated 08/11/2022 Safety training on harvesting activity dated 03/11/2022 Accident investigation training dated 26/10/2022 Workshop safety training dated 11/10/2022 First aid training dated 11/08/2022</p> <p><u>GSRE</u> Hearing conservation training dated 9/2/2023</p>	

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	<p>Chemical calibration, maintenance and usage of interump dated 08/02/2023</p> <p>First Aid training dated 08/02/2023</p> <p>d) The estates provide PPE to the employees relevant to the work handled by the workers. The list of PPE that were provided by the estates are as below:</p> <p>GTME</p> <table border="1" data-bbox="1072 730 1792 967"> <thead> <tr> <th>Type of work</th> <th>Type of PPE</th> <th>Dated</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Driver (Sangar)</td> <td>Earplug</td> <td>23/2/22</td> </tr> <tr> <td>Safety goggle</td> <td>12/1/22</td> </tr> <tr> <td>Organic catridge</td> <td>16/12/22</td> </tr> <tr> <td rowspan="3">Sprayer (Sujit)</td> <td>Safety harness</td> <td>22/08/22</td> </tr> <tr> <td>Respirator</td> <td>26/2/22</td> </tr> <tr> <td>Apron</td> <td>26/5/22</td> </tr> </tbody> </table> <p>GSGE</p> <table border="1" data-bbox="1072 1058 1792 1259"> <thead> <tr> <th>Type of work</th> <th>Type of PPE</th> <th>Dated</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Premixer (Ashis)</td> <td>Nitril glove</td> <td>26/12/2022</td> </tr> <tr> <td>Apron</td> <td>12/9/2022</td> </tr> <tr> <td>Rubber boot</td> <td>17/2/2022</td> </tr> <tr> <td rowspan="2">Small tractor (Sancit Kumar)</td> <td>Safety helmet</td> <td>11/10/2022</td> </tr> <tr> <td>Rubber Boot</td> <td>26/02/2022</td> </tr> </tbody> </table> <p>e) SOP for chemical management SMP-GPB-28 (Rev 04), Dated July 2018) was established. Register of Chemical was sighted to include</p>	Type of work	Type of PPE	Dated	Driver (Sangar)	Earplug	23/2/22	Safety goggle	12/1/22	Organic catridge	16/12/22	Sprayer (Sujit)	Safety harness	22/08/22	Respirator	26/2/22	Apron	26/5/22	Type of work	Type of PPE	Dated	Premixer (Ashis)	Nitril glove	26/12/2022	Apron	12/9/2022	Rubber boot	17/2/2022	Small tractor (Sancit Kumar)	Safety helmet	11/10/2022	Rubber Boot	26/02/2022	
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		<p>the entire chemical used in the estate. Sighted evidence of chemical register for samples unit has been updated on January 2022.</p> <p>f) Verification sample on HIRARC for Tractor -FFB/Worker/Chemical (HIRARCGTME-06). Sighted the HIRARC already included the NRA recommendation on ear plug for tractor driver and also Hazard category was not completed in Genting Tebong Estate. All sample estate HIRARC have been verified and updated on January 2023.</p> <p>g) The estates provide PPE to the employees relevant to the work handled by the workers. The list of PPE that were provided by the estates are as below:</p> <ul style="list-style-type: none"> <li>i. Harvester - Safety Helmet, Sickle Cover, Hand Glove, Wellington Boots</li> <li>ii. Sprayers - Respirator, Nitrile Glove (Chemical Resistant), Goggles, Wellington Boots, Apron.</li> <li>iii. Manuring - Apron, Wellington Boots, Dust Mask</li> </ul> <p>h) The responsible person(s) for workers' safety and health was Mr Murali a/l Manikam as per appointment letter dated 01/11/2021 in GSGE. In GSRE, En Mohamad Bin Sahat have been appointed as person responsible for safety dated 18/08/2022.</p> <p>i) OSH meeting record was available in GSGE as per verification, the record latest was 16/12/2022. This meeting conducted 3 monthly basis and previously record was available dated 22/03/2022, 21/06/2022 and 27/09/2022. This meeting to discuss employee's health, safety and welfare.</p> <p>In GSRE, OSH meeting conducted on 17/12/2022 and previously conducted on 27/08/2022, 20/06/2022 &amp; 14/03/2022.</p>	

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		<p>j) The Estates has site specific Plans in the OSH Manual (OM-GPB-04, Rev:0, Dated 1/1/10) including ERP for accident, ERP for Fire, ERP for chemical spillage, maps showing assembly areas and up to date lists of emergency contacts with training conducted to communicate the Plan. There also standard operating procedure for Fire Fighting as per SOP-PD-12 rev: 00 issue date: Oct 2020. This also included fire control system.</p> <p>k) The accident and incident record were available. Record JKKP 8/127650/2023 dated 12/01/2023, and also 1 record of JKKP 7 dated 03/02/2022 for hearing loss in GSGE.            GTME, JKKP8/132849/2022 dated 18/1/2023 and 6 record of JKKP 7 was available in estate.</p> <p>l) First aid box in GSGE have 26 box that included post AP, Klinik, workshop, office and mandora. This First aid box will be check monthly basis and latest check as per verification was on 25/01/2023. Training for First aid already been conducted on 11/08/2022.</p>	
<b>Criterion 4.4.5: Employment conditions</b>			
<b>4.4.5.1</b>	<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><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad had developed Social Policy, endorsed by President &amp; Chief Operating Officer, dated on 14/09/2020. The company stated their commitment to ensure their workers are treated fairly, equally and with respect according to local, national and ratified international laws. The company shall:</p> <ul style="list-style-type: none"> <li>• Respect human rights and support international human rights law.</li> <li>• Provide safe and healthy working environment.</li> <li>• Respect the right of workers to join or form legal trade unions.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Not use forced or trafficked labor in their operating units.</li> <li>• Not use any child labor.</li> <li>• No discrimination in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.</li> <li>• Not commit any physical abuse, threatened, harassment or verbal abuse towards the employees.</li> </ul>	
<b>4.4.5.2</b>	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p><b>- Major compliance -</b></p>	<p>The company is committed to ensure all the employees are treated equally regardless of race, nationality religion, gender, age, and other political opinions in line with their policy. Stated the company's commitment as above. There was no evidence of any form of discriminatory practice.</p>	Complied
<b>4.4.5.3</b>	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad's employment contracts for workers were available for verification. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the workers.</p> <p>Based on sampled pay slips, it was found that the wages were paid in line with the Minimum Wage Order 2022. Sampled workers ID number whose pay slips for the months of February, June, September and December 2022 were verified.</p>	Complied
<b>4.4.5.4</b>	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p>	<p>To ensure employees of contractors are paid based on legal or industry minimum standards, the management requests pay slips from the contractors. Pay slips of employees from several contractors of the sampled estates were available for verification. Generally, the salary</p>	Complied

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	- <b>Minor compliance</b> -	was found to meet the minimum standard requirements.	
<b>4.4.5.5</b>	The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.  - <b>Major compliance</b> -	Employee data base is kept and maintained in a computer software. All the required information such as names, gender, date of birth, date of entry, job description, and ID number was available in the data base.	Complied
<b>4.4.5.6</b>	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.  - <b>Major compliance</b> -	Offer letters were issued and acceptance of offer were acknowledged, and copies were kept by the employees. This has been verified through interview with the workers. The terms and conditions such as job scope, salary, termination of employment, annual leave entitlement, were clearly stated in the contract agreement.	Complied
<b>4.4.5.7</b>	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.  - <b>Major compliance</b> -	Estates established a time recording system using Check Roll Book for all employees at different station. The working hours for all employees have been clearly documented in the Check Roll Book as well as their pay slip under OT section to ensure transparent for both employees and employer.  Time recording system has been carried out manually on daily basis for field and office staff & executives. For office staff & executives, the working hours are recorded in the Executives & Staff Attendance List. For field workers, they record the working hours in the Daily Time Record. The overtime working hours always approved by the assistant manager. The documented working hours available in the daily check roll records.	Complied
<b>4.4.5.8</b>	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	The working hours and break time have been clearly stated in the Employment Contract. Sighted in the Contract Agreement the rate of overtime which is agreed by both parties. There is no complaint	Complied

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	mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. <b>- Major compliance -</b>	received regarding payment or forced to work on overtime during site interview. Working hours: <ul style="list-style-type: none"> <li>Daily rated worker: Monday to Saturday (6.30 am – 2.00 pm), no lunch break but have half hour for refreshment in field.</li> <li>Piece rated worker: Monday to Saturday (6.30 am – 4.30 pm), 2.5 hours break in between.</li> </ul>	
<b>4.4.5.9</b>	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. <b>- Major compliance -</b>	Based on records of sample employees’ the pay slips found in compliance with employees’ terms and conditions of MAPA Circular No. 4/2020; The Malayan Agricultural Producers Association; Date: 30/1/2020; MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019. This also in-line with Malaysia Employment Act 1955.	Complied
<b>4.4.5.10</b>	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. <b>- Minor compliance -</b>	All local employees are provided with the mandatory Employee Provident Fund (EPF) contributions while both local and foreign employees contributed with Social Security Organization (SOCSO). Additionally, other benefits offered by the company including the following: <ul style="list-style-type: none"> <li>- Productivity incentive</li> <li>- Out-turn incentive</li> <li>- Transport allowance</li> <li>- Telephone allowance</li> <li>- Motorcycle allowance</li> </ul>	Complied
<b>4.4.5.11</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards	Residents at all estate housing have access to facilities established by the company, such as health clinic, sports field, community hall,	Complied



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	Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. <b>- Major compliance -</b>	crèche, and places of worship. The estates provide electricity and water to all workers for free. The Medical Assistant conducts weekly Line-site and Housing Inspection at the Workers Quarters to ensure that the area is maintained at an acceptable standard. Sighted the weekly Line-site and Housing Inspection Records in respective estates.	
<b>4.4.5.12</b>	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. <b>- Major compliance -</b>	Sexual Harassment Policy was established and endorsed by the Chief Operating Officer, dated on 03/08/2009. The committed to strive for a harassment-free environment and avoid behavior that may create an atmosphere of hostility and intimidation of any kind at the workplace. No one should be subjected to any form of sexual harassment while carrying out their duties. Procedure on Prevention and Eradication of Sexual Harassment at Workplace was established on 11/10/03 and revised on 11/10/13. Gender Committee meeting was conducted on regular basis. Among the agenda discussed were previous matter, chairman briefing, briefing on sexual harassment policy & guidelines and others.	Complied
<b>4.4.5.13</b>	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.	Genting Plantations Berhad had developed Social Policy, endorsed by President & Chief Operating Officer, dated on 14/09/2020. The company stated their commitment to ensure their workers are treated fairly, equally and with respect according to local, national and ratified international laws. The company shall: <ul style="list-style-type: none"> <li>• Respect human rights and support international human rights law.</li> <li>• Provide safe and healthy working environment.</li> <li>• Respect the right of workers to join or form legal trade unions.</li> <li>• Not use forced or trafficked labor in their operating units.</li> </ul>	Complied

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	- Major compliance -	<ul style="list-style-type: none"> <li>• Not use any child labor</li> <li>• No discrimination in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.</li> <li>• Not commit any physical abuse, threatened, harassment or verbal abuse towards the employees.</li> </ul>	
<b>4.4.5.14</b>	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not expose to hazardous working conditions.</p> <p>- Major compliance -</p>	<p>Based on verification of the employees' data base extracted from the data system, there was no evidence that children and young persons have been recruited. This is also in-line with the Social Policy signed by the President and Chief Operating Officer dated 14/09/2020. In the policy stated that the company shall not use any child labour. The children's right is respected. The policy was communicated to all the employee and stakeholders through briefing, training, and meeting and displayed at notice boards in the operating units.</p>	Complied
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	<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>All employees and contractors are appropriately trained. Training matrix and training programme for 2022/23 was established by the estates' management.</p> <p><u>GTME</u></p> <p>Hearing conservation training conducted on 08/03/2022</p> <p>Safety and Health Policy training dated on 02/12/2022</p> <p>First Aid training dated on 26/3/2022</p> <p>Fire drill training dated 10/2/2022</p> <p>Basic Occupational First aid, CPR, &amp; AED training dated 29/09/2021</p>	Complied

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		<p><u>GSGE</u>            Fire drill training dated 29/12/2022            Hearing conservation training dated 08/11/2022            Safety training on harvesting activity dated 03/11/2022            Accident investigation training dated 26/10/2022            Workshop safety training dated 11/10/2022            First aid training dated 11/08/2022</p> <p><u>GSRE</u>            Trunk injection training dated 24/8/2022            Tractor driving and safety dated 10/9/2022            PPE using and calibration of chemical training dated 20/10/2022            Manuring and PPE training dated 18/08/2022            Pest and Disease training dated 24/08/2022            Spraying training dated 20/10/2022</p>	
<b>4.4.6.2</b>	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p><b>- Major compliance -</b></p>	<p>The estate has established the training program for the mill executive, workers and contractors base on training need analysis conducted. The training need analysis was documented in Training Matrix analysis. The analysis was based on job designation and type of training needs for the employee. The training type was divided into 3 type, Core training, non-core training – theoretical training and non-core training – theoretical and hands on training. The training has been identified and already put for planning. Verification on training record for year 2022 as per below:</p>	Complied

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		Chemical handling training dated 4/2/2022 PPE training dated 4/2/2022 Chemical register update training dated 28/07/2022 Spill kit and emergency training dated 16/12/2022 Tractor driving training dated 17/02/2022 Manuring and safety training dated 18/07/2022 Motorized cutter for harvesting training dated 03/11/2022	
<b>4.4.6.3</b>	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure. <b>- Minor compliance -</b>	The estate has training program which updated annually based on training need analysis. The training identified were programmed throughout the year dated Jan 2023.	Complied
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
<b>4.5.1.1</b>	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. <b>- Major compliance -</b>	The Group Environmental Policy had been established and implemented for all Mills and Estates. The policy was signed by the President / Chief Operating Officer of Genting Plantations Berhad dated 05/10/2009 and displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented along with other Policies through the OSH activities by the on-site Safety Officers and monitored by OSH/Sustainability Unit from Head Office. Included in the Policy among others are the following commitment. a) Commitment and protection of the environment according to the applicable laws.	Complied

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		<p>b) Establishment of environmental management plan developed from results of aspect and impact analysis, mitigation, monitoring plans and records of implementation with timelines.</p> <p>c) Continual improvement program</p> <p>d) Awareness through training/ briefing program &amp; session to all employees and stakeholders.</p> <p>During interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the basic objectives and intention of the Policy.</p>	
<b>4.5.1.2</b>	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations.</p> <p><b>- Major compliance -</b></p>	<p>The Environmental Policy was established, signed by President and Chief Operating Officer on 5/10/2009. Therein the policy among others has stated that the Company is committed to protecting the environment and conserving biodiversity through sustainable development. This is policy is prominently displayed in the office along with other Company's Policies.</p> <p>The policy was communicated to the employees through the briefing during muster and training ad hoc basis.</p> <p>The aspects and impacts had been provided in the Environmental Aspects and Impacts And Evaluation Of Significance 2022 Document no GSPE/EAI/5.1 reviewed in Feb 2022 compiled internally by the Sustainability Department The analysis among others had covered the following activities;</p> <p>a) Harvesting/ weeding/ fertilizer application</p> <p>b) Mulching/ road upkeep/ ramp</p> <p>c) Workshop/ chemical store</p> <p>d) Lubricant store/ fertilizer store</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance								
		e) Oil palm thinning f) Building construction g) Drainage/ nursery/ replanting h) EFB mulching i) Impact of field operations activities towards environmental j) Identification of riparian zone k) All the relevant positive/ negative impact & mitigation plan									
<b>4.5.1.3</b>	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. <b>- Major compliance -</b>	The Environmental improvement and management plan was established at all the estates in the CU to include surface water runoff, water quality, chemical application, air quality, zero burning, fertilizer application and waste management.  All the mitigation plans/objectives were established to mitigate the pollution identified. Among others, construction of terraces, planting of leguminous cover crop, construction of road site pit, clear marking for buffer one area, chemical reduction, zero burning policy, avoid fertilizer application close to waterways, proper landfill site and recyclable waste.	Complied								
<b>4.5.1.4</b>	A programme to promote the positive impacts should be included in the continual improvement plan. <b>- Minor compliance -</b>	The environmental improvement plans are identified the Environmental Impact Assessment After Planting 2022 having details of mitigation of the negative impacts. They are summarized and shown below. <table border="1" data-bbox="1025 1209 1848 1372"> <thead> <tr> <th></th> <th>Activities</th> <th>Impacts</th> <th>Mitigation plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Harvesting</td> <td>Promote positive impact to soil structure through biomass frond &amp; EFB mulching.</td> <td>Practice proper frond stacking. EFB applied to improve nutrient &amp; biomass</td> </tr> </tbody> </table>		Activities	Impacts	Mitigation plan	1	Harvesting	Promote positive impact to soil structure through biomass frond & EFB mulching.	Practice proper frond stacking. EFB applied to improve nutrient & biomass	Complied
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		2	Weeding	Negative impact as polluting the soil with usage of chemicals.	Dosage of chemicals is monitored & calibrated. Cattle integration introduced to reduce reliance of chemical.	
		3	Manuring	Over usage of chemical & fertilizer affecting soil toxicity causing leaching/ wash off.	Identify buffer zones and to prevent leaching of fertilizer and chemicals. Application along frond stacking rows.	
		4	Road upkeep	Damages through grading and chambering	Water collected at drain pits is collected to maximize moisture of nearest palm.	
		5	Loading Bay	FFB transportation of lorries in minimizing leakages of fuel	Education to drivers and monitoring of vehicles movements.	
		6	Workshop	Spillage to prevent pollution	Availability of spill kit and health surveillance for welding personnel.	
<b>4.5.1.5</b>	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.  - <b>Major compliance</b> -	The 2023 training program has included the following subject in relation to the environmental education and awareness.			Complied	
			(Estate) subject	Schedule		
				1-4	5-9	9-12
		1	Requirement MSPO	/		
		2	ESH policy objective, target & program	/		
		3	ESH role & function	/		
		4	ERP procedure and evacuation		/	

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Criterion / Indicator		Assessment Findings					Compliance																																	
		5	Legal & other requirement		/																																			
		6	HIRARC & EAI		/																																			
		7	Scheduled waste management		/																																			
<b>4.5.1.6</b>	<p>Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.</p> <p><b>- Major compliance -</b></p>	<p>Discussions on environmental issues were discussed at the following forums:</p> <ul style="list-style-type: none"> <li>a) Stakeholder meetings</li> <li>b) ESH meeting on environmental issue if arises.</li> <li>c) Monthly management meeting should there be issues raised.</li> <li>d) Daily briefing during muster</li> </ul> <p>The respective stakeholder meetings for all the estates were held at the respective estates. Mainly the discussion focused on the scheduled waste and domestic waste handling. Minutes of meeting was sighted and verified.</p>					Complied																																	
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>																																								
<b>4.5.2.1</b>	<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><b>- Major compliance -</b></p>	<p>The estates record the following range data and tabulated the ratio against the FFB produced to determine the efficiency of their operations;</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Estate</th> <th colspan="5">Diesel L / FFB mt</th> </tr> <tr> <th>Baseline</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>GTME</td> <td>3.00</td> <td>3.45</td> <td>4.84</td> <td>2.42</td> <td>2.43</td> </tr> <tr> <td>2</td> <td>GSGE</td> <td>5.50</td> <td>4.28</td> <td>3.97</td> <td>5.82</td> <td>3.82</td> </tr> <tr> <td>3</td> <td>GSRE</td> <td>1.30</td> <td>1.20</td> <td>1.07</td> <td>1.22</td> <td>1.51</td> </tr> </tbody> </table> <p>There has been initiative by the management in reducing the diesoline consumption through the following:</p> <ul style="list-style-type: none"> <li>a) Manual grass cutting reducing the tractor running hours.</li> </ul>						Estate	Diesel L / FFB mt					Baseline	2019	2020	2021	2022	1	GTME	3.00	3.45	4.84	2.42	2.43	2	GSGE	5.50	4.28	3.97	5.82	3.82	3	GSRE	1.30	1.20	1.07	1.22	1.51	Complied
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Criterion / Indicator		Assessment Findings	Compliance																					
		b) Optimum running hours of tractors. c) Scheduled maintenance of tractors.																						
<b>4.5.2.2</b>	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. <b>- Major compliance -</b>	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets. Refer details as per indicator 4.5.2.1 above. Figures were extracted from the diesel issuance of estate diesel tank.	Complied																					
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible. <b>- Minor compliance -</b>	There was no opportunity to use renewable energy (shell/fibre/EFB) in the estate with the present technology and facilities within the industry.	Complied																					
<b>Criterion 4.5.3: Waste management and disposal</b>																								
<b>4.5.3.1</b>	All waste products and sources of pollution shall be identified and documented. <b>- Major compliance -</b>	All waste and pollution are identified and documented in the Waste Management Action Plan. The compilation for 2023 was made at by the Sustainability Department applicable to the estates. Details of waste generated from the estates operations among others as shown below: <table border="1" data-bbox="1034 1125 1848 1393"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste rubbish</td> <td>Line sites, office, workshop, store</td> </tr> <tr> <td>2</td> <td>Industrial waste-fertilizer bags</td> <td>Empty bags store</td> </tr> <tr> <td>3</td> <td>Scrap metal</td> <td>Workshop</td> </tr> <tr> <td>4</td> <td>SW 404 Clinical waste</td> <td>Clinic</td> </tr> <tr> <td>5</td> <td>SW rags, plastics, filters</td> <td>Workshop</td> </tr> <tr> <td>6</td> <td>Spent lubricant &amp; hydraulic oil</td> <td>Workshop</td> </tr> </tbody> </table>		Type of waste	Location	1	Domestic waste rubbish	Line sites, office, workshop, store	2	Industrial waste-fertilizer bags	Empty bags store	3	Scrap metal	Workshop	4	SW 404 Clinical waste	Clinic	5	SW rags, plastics, filters	Workshop	6	Spent lubricant & hydraulic oil	Workshop	Complied
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Criterion / Indicator		Assessment Findings	Compliance			
		<table border="1"> <tr> <td>7</td> <td>Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW</td> <td>Scheduled waste store</td> </tr> </table> <p>The requirement is established, and the procedure documented under this subject titled:</p> <ul style="list-style-type: none"> <li>a) Landfill/ domestic waste management GBP 12 dated 01/12/14</li> <li>b) Scheduled waste management GBP 11 dated 11/08/20</li> <li>c) Recyclable waste management GBP 13 dated 11/10/13</li> </ul> <p>The procedure has detailed the definition of solid waste. The types of solid wastes have been categorized as follows:</p> <ul style="list-style-type: none"> <li>a) Sisa pepejal komersial/ pembinaan</li> <li>b) Sisa pepejal isi rumah/ perindustrian</li> <li>c) Sisa pepejal keinstitusian</li> <li>d) Sisa pepejal import/ awam</li> </ul> <p>In addition, there are 'Pelan Pengurusan Domestik Dan Bahan Buangan Tahun 2023. In this plan activities as scheduled are monitored with the date/month recorded. This was sighted and verified. All landfill sites have 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 estates map.</p> <p>The estates also identified the types of domestic waste:</p> <ul style="list-style-type: none"> <li>a) Sisa baki (Home domestic)</li> <li>b) Sisa pukal e.g. old furnitures, electrical appliances</li> <li>c) Sisa kitar semula (Recycled)</li> </ul>	7	Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW	Scheduled waste store	
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Criterion / Indicator		Assessment Findings	Compliance																		
		<p>Inside the Management Plan the estate has included among others.</p> <p>a) Identification of scheduled waste/ domestic waste.</p> <p>b) Process disposes domestic waste to the estate landfill.</p> <p>The estates also maintained records of source identification source and type of scheduled waste.</p>																			
<b>4.5.3.2</b>	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p><b>- Major compliance -</b></p>	<p>The disposal/recycling of waste generated by the estates are made as follows:</p> <table border="1"> <thead> <tr> <th>Type of waste</th> <th>Location</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>Domestic waste rubbish</td> <td>Line sites, office, workshop, store,</td> <td>Collection/ disposal 2x/ week to the estate designated landfill.</td> </tr> <tr> <td>Industrial waste-fertilizer bags</td> <td>Empty bags store</td> <td>Inventory of bags, reuse for LF collection, sell to appointed contractor for surplus quantity.</td> </tr> <tr> <td>Scrap metal</td> <td>Workshop</td> <td>Inventory maintained, tender at Regional level for sale to licensed contractors</td> </tr> <tr> <td>SW 404 Clinical waste</td> <td>Clinic</td> <td>Inventory maintained. Storage in sharp bin in clinic. Disposal to Kualiti Alam Sdn Bhd.</td> </tr> <tr> <td>SW rags, plastics, filters,</td> <td>Workshop</td> <td>Inventory maintained. Storage in scheduled waste store. Disposal to Southern Strength Sdn Bhd.</td> </tr> </tbody> </table>	Type of waste	Location	Action to be taken	Domestic waste rubbish	Line sites, office, workshop, store,	Collection/ disposal 2x/ week to the estate designated landfill.	Industrial waste-fertilizer bags	Empty bags store	Inventory of bags, reuse for LF collection, sell to appointed contractor for surplus quantity.	Scrap metal	Workshop	Inventory maintained, tender at Regional level for sale to licensed contractors	SW 404 Clinical waste	Clinic	Inventory maintained. Storage in sharp bin in clinic. Disposal to Kualiti Alam Sdn Bhd.	SW rags, plastics, filters,	Workshop	Inventory maintained. Storage in scheduled waste store. Disposal to Southern Strength Sdn Bhd.	Complied
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		Spent lubricant & hydraulic oil	Workshop	Inventory maintained. Storage in scheduled waste store. Disposal to Southern Strength Sdn Bhd	
		Disposed containers, bags, equipment contaminated with chemicals, pesticides,	Scheduled waste store	Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by G Planter authorized vendor by Jabatan Pertanian via letter dated 04/1/2014.	
<b>4.5.3.3</b>	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p><b>- Major compliance -</b></p>	<p>The procedures for handling used chemicals classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by Head Office personnel and implemented in all estates and mills for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows:</p> <ul style="list-style-type: none"> <li>a) Management of class 2 (and higher) chemical containers.</li> <li>b) Management of fertilizer bags</li> </ul> <p>These documents were established on 13/8/2009 (OSH Manual) and 01/8/2013 (Sustainability Manual) and remained effective for practice in all estates and mills. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The estates scheduled waste is disposed to Southern Strength (M) Sdn Bhd. The estates compiled to the maximum 180 days retention days. All units in mt otherwise stated.</p>			Major Non-compliance

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		Estate	Date	SW 305	SW 306	SW 110	SW 410	SW 409	SW 408		
		GTME	09/02/23	0.0900	0.2970	0.0154	0.2799	0.0433	-		
		GTME	12/07/22	0.0900	0.0450	0.0100	0.1400	-	0.0280		
		Estate	Date	SW 305	SW 306	SW 408	SW 410	SW 409	SW 312		
		GSGE	08/02/22	1.097	0.2500	0.0480	0.1280	0.0620	0.1870		
		GSGE	07/07/22	-	0.1670	0.0820	0.0980	0.1840	0.2260		
		Estate	Date	SW 305	SW 306	SW 312	SW 410	SW 409	SW 110		
		GSRE	08/02/23	0.0766	-	0.0020	0.0575	-	0.0400		
		GSRE	06/07/22	0.1053	0.0382	-	0.0740	-	0.0200		
		Clinical waste SW404 is despatched to Kualiti Alam Sdn Bhd.									
			Estate	27/10/22	Quantity						
		1	GPTME	0.0067 mt	0.0067						
		2	GSGE	16/07/22	0.0010						
		3	GSRE	31/12/22	0.0005						
		Sg Rayat Estate 16/02/2023 - Visit to the workshop area discovered presence of empty lubricants containers being disposed into a dustbin and not stored at the designated containers. Thus, 2307753-202302-M2 Major NC was issued.									
<b>4.5.3.4</b>	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	The guidelines and practice for handling empty pesticides containers are as established in the operational control procedure established as given in 4.5.3.3.						Complied			
		a) All class 2 and above containers are tripled rinsed and holes									

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	<p>national programme on recycling of used HDPE pesticide containers.</p> <p><b>- Major compliance -</b></p>	<p>punctured at the bottom only if the waste generator is to dispose as non-scheduled waste.</p> <p>b) Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process.</p> <p>These guidelines are based on Department of Agriculture ref 91/120/038/014 dated 7/11/2002. During the site visit this has been adhered mainly containers are tripled rinsed and holes punctured at the container base. Empty containers were despatched to licensed buyer namely G Planter. Letter dated 04/1/2014 from Jabatan Pertanian refers. Records sighted as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Date</th> <th>Chemical containers</th> <th>Ally Bottle</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>GTME</td> <td>12/01/23</td> <td>118 units</td> <td>39 units</td> </tr> <tr> <td>2</td> <td>GSGE</td> <td>31/01/23</td> <td>698 units</td> <td>184 units</td> </tr> <tr> <td>3</td> <td>GSRE</td> <td>01/02/23</td> <td>344 units</td> <td>69 units</td> </tr> </tbody> </table>		Estate	Date	Chemical containers	Ally Bottle	1	GTME	12/01/23	118 units	39 units	2	GSGE	31/01/23	698 units	184 units	3	GSRE	01/02/23	344 units	69 units	
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<b>4.5.3.5</b>	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p><b>- Minor compliance -</b></p>	<p>The domestic waste was disposed as per SOP Landfill and domestic waste management, SMP-GPB-12, Rev:01, Dated 1/12/2014). The locations of the landfill areas are at the respective estates shown below. All locations were adequately distanced from watercourses and housing complex minimum of 50 meters.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Landfill site</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>GPTME</td> <td>P96</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>2</td> <td>GPSRE</td> <td>P10A</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>3</td> <td>GPSGE</td> <td>P95</td> <td>Collection 2/3 x week</td> </tr> </tbody> </table>		Estate	Landfill site	Remarks	1	GPTME	P96	Collection 2/3 x week	2	GPSRE	P10A	Collection 2/3 x week	3	GPSGE	P95	Collection 2/3 x week	Complied				
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4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	<p>The Environmental Improvement and Management plan was established at estates and reviewed annually. The following issues and mitigation program among others have been identified.</p> <table border="1"> <thead> <tr> <th></th> <th>Issues</th> <th>Mitigation program</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Surface water runoff</td> <td>Construction of terraces</td> </tr> <tr> <td>2</td> <td>Water quality</td> <td>Avoid fertilizer application close to waterways Clear marking for buffer one area</td> </tr> <tr> <td>3</td> <td>Chemical application</td> <td>Planting of leguminous cover crop Chemical reduction</td> </tr> <tr> <td>4</td> <td>Air quality</td> <td>Zero burning policy</td> </tr> <tr> <td>5</td> <td>Zero burning</td> <td>Zero burning policy, landfill site &amp; recyclable waste</td> </tr> <tr> <td>6</td> <td>Fertilizer application</td> <td>Fertilizer application close to waterways</td> </tr> <tr> <td>7</td> <td>Waste management</td> <td>Proper landfill site and recyclable waste</td> </tr> </tbody> </table> <p>The GHG emissions due to the operations is identified and recorded in the palm GHG version 3.01. These GHG calculations were made as per certification unit basics.</p>		Issues	Mitigation program	1	Surface water runoff	Construction of terraces	2	Water quality	Avoid fertilizer application close to waterways Clear marking for buffer one area	3	Chemical application	Planting of leguminous cover crop Chemical reduction	4	Air quality	Zero burning policy	5	Zero burning	Zero burning policy, landfill site & recyclable waste	6	Fertilizer application	Fertilizer application close to waterways	7	Waste management	Proper landfill site and recyclable waste	Complied
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4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. <b>- Major compliance -</b>	The action plan has been elaborated in 4.5.4.1 above.	Complied																								
<b>Criterion 4.5.5: Natural water resources</b>																											
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:	<p>The Water Management Plan for the estates has been established. with latest review made on Jan 2023. The plan emphasized on the following areas.</p> <p>a) Water source</p>	Complied																								

Criterion / Indicator	Assessment Findings	Compliance															
<p>a. Assessment of water usage and sources of supply.</p> <p>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities.</p> <p>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.).</p> <p>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> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p><b>- Major compliance -</b></p>	<p>b) Efficient use of water</p> <p>c) Renewability of water source</p> <p>d) Avoidance of surface and ground water contamination</p> <p>Effort developed in order to maintain the quality and availability of natural water resources by practicing efficient water consumption through various methods such as</p> <p>a) Implementation of rainwater harvest, construction of water gate for effective management of collection/main drain,</p> <p>b) Establishment of <i>mucuna bracteata</i> to prevent erosion, side drain at field road to control water, frond stacking,</p> <p>c) Enhancement of ground vegetation at bare ground area.</p> <p>All estates received supply of piped treated water from SAJ for the domestic consumption. There was rain harvest being practiced in the estates/mill. Water from triple rinsing of pesticide containers was reused for spraying. Records of rainfall data to assist in the water management plans were sighted from 2008. The estates adopted the following management plan in relation to water management. Details of the action plan and monitoring among others are tabled as follows:</p> <table border="1" data-bbox="1032 1118 1850 1382"> <thead> <tr> <th></th> <th colspan="2">Areas of concerns</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water source</td> <td>Water from catchment pond</td> <td>Supply to residential areas/ complex for all divisions Use in nursery and irrigation projects</td> </tr> <tr> <td>2</td> <td rowspan="2">Efficient use of water</td> <td>Residential areas</td> <td>Monitoring of pipes leakages</td> </tr> <tr> <td></td> <td>Optimize usage &amp; reduce wastage</td> <td>Spraying pump maintenance</td> </tr> </tbody> </table>		Areas of concerns		Action Plan	1	Water source	Water from catchment pond	Supply to residential areas/ complex for all divisions Use in nursery and irrigation projects	2	Efficient use of water	Residential areas	Monitoring of pipes leakages		Optimize usage & reduce wastage	Spraying pump maintenance	
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Criterion / Indicator		Assessment Findings		Compliance
			Education/training	Promote water conservation & awareness among employees
	3	Renewability water source	Rainwater capture at catchment	Monitoring of pond level
			Rainwater harvest	Collection and usage at workshop
	4	Avoidance of surface/ ground water contamination	Sewage and septic tank	To ensure no leakage of sewage/ septic tank functioning properly/ cover available
			Rubbish collection at line site	Collection 2x/week Landfill located 50m from residential areas. Recycling practices
			Drainage system	Free flow drains & scheduled maintenance
			Water pollution	Wash from chemical bays collected in sump for recycling Trap for oil constructed
			Water quality	Sampling of water samples at various fields identified for river water sample. Establishment of riparian zone along natural water ways. Maintain the riparian buffer zone during replanting

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Criterion / Indicator		Assessment Findings		Compliance																											
		5	Others Flood/ water logging areas	Monitoring of rainfall, Desilting drain program Monitoring of water level using yard stick Construction of MCP																											
<p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Genting Plantations Bhd and DID guidelines in 2001). The buffer zones established are as following:</p> <table border="1"> <thead> <tr> <th>1</th> <th>River width (Meters)</th> <th>Buffer Zone (Meters)</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>&gt;40</td> <td>50</td> </tr> <tr> <td>3</td> <td>20-40</td> <td>40</td> </tr> <tr> <td>4</td> <td>10-20</td> <td>20</td> </tr> <tr> <td>5</td> <td>5-10</td> <td>10</td> </tr> <tr> <td>6</td> <td>&lt;5</td> <td>5</td> </tr> </tbody> </table> <table border="1"> <tbody> <tr> <td>1</td> <td>GPB Tanah Merah</td> <td>Sg Tengkah</td> </tr> <tr> <td>2</td> <td>GPB Sg Rayat</td> <td>OP16B Waterways</td> </tr> <tr> <td>3</td> <td>GPB Sri Gading</td> <td>Sg Sengkuang</td> </tr> </tbody> </table> <p>All the estates in the CU continues to protect the water courses and wetlands including maintaining and restoring appropriate riparian buffer zones at or before replanting along all natural waterways within the estates.</p> <p>Samples are taken from the estates for detection of any pollution arising from the estate's activities. Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer</p>					1	River width (Meters)	Buffer Zone (Meters)	2	>40	50	3	20-40	40	4	10-20	20	5	5-10	10	6	<5	5	1	GPB Tanah Merah	Sg Tengkah	2	GPB Sg Rayat	OP16B Waterways	3	GPB Sri Gading	Sg Sengkuang
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Criterion / Indicator		Assessment Findings	Compliance																								
		<p>application effect to the water courses. Extracted record of both the estates with details below:</p> <p>Among others management plan taken:</p> <ul style="list-style-type: none"> <li>a) Regular inspection at buffer/ HCV areas</li> <li>b) Monitor water from surrounding areas</li> <li>c) Track, measure and report all activities around river</li> <li>d) Train and educate workers.</li> </ul> <p>Among others parameters as shown below:</p> <table border="1"> <thead> <tr> <th></th> <th>Parameter</th> <th>Standard</th> <th></th> <th>Parameter</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>5-6</td> <td>4</td> <td>S Solids</td> <td>50-150</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>3-6</td> <td>5</td> <td>A nitrogen</td> <td>0.3-0.9</td> </tr> <tr> <td>3</td> <td>COD</td> <td>23-30</td> <td>6</td> <td>Phosporus</td> <td>-</td> </tr> </tbody> </table> <p>The management concludes that the water quality is acceptable and does not create major impact to the water system.</p>		Parameter	Standard		Parameter	Standard	1	PH	5-6	4	S Solids	50-150	2	BOD	3-6	5	A nitrogen	0.3-0.9	3	COD	23-30	6	Phosporus	-	
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<b>4.5.5.2</b>	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p><b>- Minor compliance -</b></p>	<p>This is in compliance by the estates. This requirement is also audited internally by the Sustainability Department personnel. During the field visit no construction of such was observed.</p>	Complied																								
<b>4.5.5.3</b>	<p>Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).</p> <p><b>- Minor compliance -</b></p>	<p>During the site visit practices of water harvesting are noted mainly constructed on flat areas in both estates. There was construction of Water Conservation Pit (WCP) ratio of 1 ha to 34 points. Roadside pits were also available at every 3 palm rows, to divert in event of water overflowing and also to benefit the nearest palm at the pit end to obtain additional moisture. This is part of the common practices introduced within the Group Agriculture Procedures.</p>	Complied																								

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<b>Criterion 4.5.6:</b> Status of rare, threatened, or endangered species and high biodiversity value																																																								
<p><b>4.5.6.1</b> 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"> <li>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</li> <li>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.</li> </ul> <p><b>- Major compliance -</b></p>	<p>The CU had re-assessed to collate information relating to HCV. The assessment contained information of both planted area and relevant wider landscape-level, and result HCV identified. There were 2 separate reports prepared by the HCV assessors 1 each for the Southern region and central region covering among others the estates GTME, GSRE, and GSGE respectively. The HCV identified in the CU is as follows. Data in ha otherwise stated:</p> <table border="1" data-bbox="1032 743 1854 1078"> <thead> <tr> <th></th> <th>Estate</th> <th>Description</th> <th>HCV 1.4</th> <th>HCV 4.2</th> <th>HCV 6</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>G T Merah</td> <td>Pokok Ara heritage OP9A</td> <td>0.5</td> <td>-</td> <td>-</td> </tr> <tr> <td>2</td> <td>G T Merah</td> <td>Riparian Buffer Zone</td> <td>-</td> <td>4.0</td> <td>-</td> </tr> <tr> <td>3</td> <td>G T Merah</td> <td>Temple - 00A / Surau 02A</td> <td>-</td> <td>1.0</td> <td>-</td> </tr> <tr> <td>4</td> <td>G Sri Gading</td> <td>Riparian Buffer Zone</td> <td>-</td> <td>4.11</td> <td>-</td> </tr> <tr> <td>5</td> <td>G Sri Gading</td> <td>Temple /Cemeteries</td> <td>-</td> <td>-</td> <td>1.0</td> </tr> <tr> <td>6</td> <td>G Sg Rayat</td> <td>Muslim Cemetery OP98A</td> <td>-</td> <td>-</td> <td>0.05</td> </tr> <tr> <td>7</td> <td>G Sg Rayat</td> <td>Chinese Cemetery OP18D</td> <td>-</td> <td>-</td> <td>0.05</td> </tr> <tr> <td>8</td> <td>G Sg Rayat</td> <td>Temple - OP 02A</td> <td>-</td> <td>-</td> <td>0.08</td> </tr> </tbody> </table> <p>The HCV assessment for both the estates was made by an appointed qualified assessors M/S S.K. Yap Forestry and Landscape Advisory Services on Oct 2009 – July 2010. The Malaysian Nature Society Dec 2014 for assigned estates in the CU. The reports were sighted and verified. The following aspects areas were assessed as to their state and management.</p> <ul style="list-style-type: none"> <li>a) Area of HCV-Shared management of forest reserve and boundary areas/buffer zones.</li> </ul>		Estate	Description	HCV 1.4	HCV 4.2	HCV 6	1	G T Merah	Pokok Ara heritage OP9A	0.5	-	-	2	G T Merah	Riparian Buffer Zone	-	4.0	-	3	G T Merah	Temple - 00A / Surau 02A	-	1.0	-	4	G Sri Gading	Riparian Buffer Zone	-	4.11	-	5	G Sri Gading	Temple /Cemeteries	-	-	1.0	6	G Sg Rayat	Muslim Cemetery OP98A	-	-	0.05	7	G Sg Rayat	Chinese Cemetery OP18D	-	-	0.05	8	G Sg Rayat	Temple - OP 02A	-	-	0.08	<p>Complied</p>
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		<ul style="list-style-type: none"> <li>b) The presence of large mammals and birds and how they are protected from poaches.</li> <li>c) IPM: use of plants to attract <i>parasitoids</i> to control bagworms &amp; barn owls for rats management and success</li> <li>d) Drainage and the conditions. Determining the presence of fishes as a bio-indicator of water health</li> </ul> <p>The reports detail the findings of a rapid appraisal of the biodiversity in the estates and addresses the MSPO relevancy to biodiversity conservation and HCV. Therein being provided details relating to the following:</p> <ul style="list-style-type: none"> <li>a) General biodiversity issues</li> <li>b) Watercourses and drainage</li> <li>c) Habitats natural and man-made</li> <li>d) Wildlife</li> <li>e) Ponds and reservoirs</li> <li>f) Wetlands/ watercourses</li> <li>g) Legal aspects</li> <li>h) Immediate and long-term effect.</li> </ul> <p>There were also presence of rivers and burial grounds (Muslim &amp; Chinese) for local communities within the estates.</p>	
<b>4.5.6.2</b>	<p>If rare, threatened or endangered species or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <ul style="list-style-type: none"> <li>a) Ensuring that any legal requirements relating to the</li> </ul>	<p>There is no RTE or high biodiversity value at CU complexes except for reported presence of snakes, monkeys and wild boars. The management and monitoring plan for HCV areas was established and reviewed annually. There were displays of signage made at site i.e.</p>	Complied

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	<p>protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p><b>- Major compliance -</b></p>	<p>a) No fishing, no manuring/ no spraying</p> <p>b) No spraying/ no hunting/ no swimming</p> <p>c) Muslim &amp; Christian cemetery signage</p> <p>There were programs held by the estates to all employees in pertaining to the awareness of HCV areas and RTE species. Interview with the employees concluded that training and briefing made during the ad-hoc session and morning muster. This is also emphasized during the training held by the Sustainability Unit programs. Employees are aware of the following reminders:</p> <p>a) An offence to capture, harm, kills any wildlife.</p> <p>b) Disciplinary measures shall be taken if found violating company rules.</p> <p>c) Riparian buffer zone to be free from any chemicals application/ pollution</p> <p>d) Relevant signs <i>NO HUNTING NO FELLING ALLOWED</i></p> <p>Training in relation to the HCV management is shown below:</p> <table border="1"> <thead> <tr> <th></th> <th>Subject</th> <th>GTME</th> <th>GSGE</th> <th>GSRE</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Company Policies Briefing</td> <td>22/2/22</td> <td>19/12/22</td> <td>01/02/23</td> </tr> <tr> <td>2</td> <td>MSPO Briefing to Contractors</td> <td>13/10/22</td> <td>27/06/22</td> <td>28/11/22</td> </tr> <tr> <td>3</td> <td>Waste Management</td> <td>13/10/22</td> <td>20/12/22</td> <td>23/06/22</td> </tr> <tr> <td>4</td> <td>Protection of HCV riparian zone</td> <td>22/4/22</td> <td>20/12/22</td> <td>17/11/22</td> </tr> <tr> <td>5</td> <td>Water Management /sampling</td> <td>12/5/12</td> <td>20/12/22</td> <td>17/11/22</td> </tr> </tbody> </table>		Subject	GTME	GSGE	GSRE	1	Company Policies Briefing	22/2/22	19/12/22	01/02/23	2	MSPO Briefing to Contractors	13/10/22	27/06/22	28/11/22	3	Waste Management	13/10/22	20/12/22	23/06/22	4	Protection of HCV riparian zone	22/4/22	20/12/22	17/11/22	5	Water Management /sampling	12/5/12	20/12/22	17/11/22	
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<b>4.5.6.3</b>	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p><b>- Major compliance -</b></p>	<p>The RTE assessment was incorporated in the HCV report and evaluation. Therein providing wildlife database categories of:</p> <p>a) Birds/ Mammals</p> <p>b) <i>Herpetofauna</i>/ Conservation status</p>	Complied																														

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		<p>c) Offence and penalties under Wildlife Conservation Act 2010  d) Provocation of wildlife.</p> <p>In records there is no RTE species observed/ spotted within the member estates in CU. Relevant action plans had been established and implemented concerning protection of the riparian, such as identification on map and ground, restriction of no chemical's activities, awareness training to workers and patrolling by Auxiliary Police. The estates reviewed the HCV management plan annually in -Jan/Feb 2023.</p> <table border="1"> <thead> <tr> <th></th> <th>HCV area</th> <th>Management &amp; Monitoring</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Protected areas</td> <td>Boundary markers estate/ forest reserve Signage on no illegal hunting/collecting &amp; no authorised entry</td> </tr> <tr> <td>2</td> <td>RTE</td> <td>Patrol the boundary area Inform all stakeholders on HCV assessment and protection Education &amp; awareness for workers Ensure no agrochemicals activities at bordering water bodies</td> </tr> <tr> <td>3</td> <td>Sacred sites</td> <td>Clear demarcation and proper fencing at identified HCV Inform community concerning utilisation of site To maintain cleanliness/ upkeep of areas Maintain a buffer in order to secure the areas from fire and other disturbances To include areas in HCV map</td> </tr> </tbody> </table>		HCV area	Management & Monitoring	1	Protected areas	Boundary markers estate/ forest reserve Signage on no illegal hunting/collecting & no authorised entry	2	RTE	Patrol the boundary area Inform all stakeholders on HCV assessment and protection Education & awareness for workers Ensure no agrochemicals activities at bordering water bodies	3	Sacred sites	Clear demarcation and proper fencing at identified HCV Inform community concerning utilisation of site To maintain cleanliness/ upkeep of areas Maintain a buffer in order to secure the areas from fire and other disturbances To include areas in HCV map	
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		4	Ecosystem Place clear boundary markers between estate and forest reserve. Place signage on no illegal activities Patrol boundary areas within forest reserve regularly Socialise the HCV assessment consisting of identification management and monitoring to all employees Information to stakeholders on the HCV	
<b>Criterion 4.5.7: Zero burning practices</b>				
<b>4.5.7.1</b>	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. <b>- Major compliance -</b>		There was no land preparation in the Estates CU by burning ever since Genting Plantations practice zero burning as per the policy in the Zero Burning Policy dated 10/8/11 signed by the President & Chief Operating Officer. Therein stating a) No open burning of any kind in all OU b) All types of waste products disposed appropriately c) Limited open burning allowed for cooking and religious purposes under appropriate supervision.  In the 2020, 2021 and 2022 replants visited during the audit in CU it was evident that all palms were felled, shredded, windrowed and left to decompose.	Complied
<b>4.5.7.2</b>	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. <b>- Major compliance -</b>		N/A. Details in 4.5.7.1 above.	Not Applicable



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<b>4.5.7.3</b>	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - <b>Major compliance</b> -	N/A. Details in 4.5.7.1 above.	Not Applicable
<b>4.5.7.4</b>	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - <b>Minor compliance</b> -	This is included in the specification of work orders in event of land preparation during a replanting. It is a standard practice in Genting Group and within the industry. However, there are variations of practices between inland and coastal estates. Trunks are felled and chipped without having to shred and windrowed in certain conditions. Adjustment of work if any are finalized from the directive of the Regional Office/ Head Office.	Complied
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Site Management</b>			
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - <b>Major compliance</b> -	The estates operations are guided by the following manuals. a) Genting Plantations Oil Palm Manual OPM issued on 9/11/99 updated June 2013. - Land preparation/ nursery/ planting/ soil conservation - Pest & Disease/ weeding/ fertilizer application/ harvesting - Managing difficult soils/ crop forecast b) Sustainability Management Procedure Manual 1/8/13 revised in 7/2/19. c) OSH Manual dated 1/1/2010. d) Environmental Control Procedure – 01/9/2018	Complied

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	<p>e) Store Operating Manual – 2014                      f) Standard Operating Procedure Malaysia Estates rev 2 (Dec 10) rev 3 (Oct 13)                      g) Jobs description - 2012</p> <p>The soil fertility and yield enhancement are described in detail in the Oil Palm Manual under the following sections                      a) OPM No 7. Manuring of oil palm                      b) OPM no 13. Managing difficult soils</p> <p>The procedures as documented in the manuals and SOPs were disseminated to the staff/workers through morning briefings and training. The manuals are kept in the main office for references of employees particularly for the supervisory personnel. Field inspection and interviews with the workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs. The SOPs included the operation activities from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt.</p> <p>Sg Rayat Estate at Sing Mah Division had a total of 338.91 ha. The site was visited and adopted the GPB guidelines of peat soil management ref OPM 13 dated April 2021 among others including the following:                      a) Water management to retain the desired water level 55cm-60 cm                      b) Peat subsidence level annual recording</p> <p>The monitoring of peat soil subsidence was guided by the following:</p>	

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		<p>a) Item 3.1 – Optimal Water Levels for Coastal/Peat Soil and                      b) Item 6.0 – Peat Soil Subsidence installation / monitoring.</p> <p>The estate monitored water levels using water level markers in drains and water tubes for ground water levels. Records relating to peat management as sampled verified for the estate are as follows:</p> <p>a) Map showing location of peat subsidence pole PSP                      b) Peat Subsidence Monitoring - measurement in cm</p> <table border="1"> <thead> <tr> <th></th> <th>Month</th> <th>Pt A OP19A</th> <th>Pt B OP20A</th> <th>Pt C OP08A</th> </tr> </thead> <tbody> <tr><td>1</td><td>05/10/16</td><td>8.2</td><td>3.3</td><td>3.4</td></tr> <tr><td>2</td><td>05/10/17</td><td>0.0</td><td>0.0</td><td>1.5</td></tr> <tr><td>3</td><td>05/10/18</td><td>0.0</td><td>0.0</td><td>1.5</td></tr> <tr><td>4</td><td>05/10/19</td><td>5.0</td><td>0.0</td><td>4.0</td></tr> <tr><td>5</td><td>05/12/20</td><td>7.8</td><td>8.5</td><td>2.1</td></tr> <tr><td>6</td><td>05/12/21</td><td>9.0</td><td>2.0</td><td>2.5</td></tr> <tr><td>7</td><td>05/12/22</td><td>2.0</td><td>2.5</td><td>2.5</td></tr> </tbody> </table> <p>c) Weekly water level/pH checklist - 2023 - All figures in cm.</p> <table border="1"> <thead> <tr> <th></th> <th>Field no</th> <th>02/1</th> <th>09/1</th> <th>16/1</th> <th>23/1</th> <th>30/1</th> </tr> </thead> <tbody> <tr><td>1</td><td>OP08A</td><td>35</td><td>33</td><td>34</td><td>35</td><td>28</td></tr> <tr><td>2</td><td>OP97C</td><td>59</td><td>61</td><td>62</td><td>50</td><td>44</td></tr> <tr><td>3</td><td>OP17B</td><td>69</td><td>67</td><td>68</td><td>60</td><td>63</td></tr> <tr><td>4</td><td>OP08B</td><td>48</td><td>48</td><td>49</td><td>41</td><td>43</td></tr> <tr><td>5</td><td>OP19A</td><td>47</td><td>46</td><td>47</td><td>32</td><td>36</td></tr> <tr><td>6</td><td>OP10A</td><td>65</td><td>64</td><td>65</td><td>64</td><td>64</td></tr> <tr><td>7</td><td>OP17A</td><td>76</td><td>74</td><td>76</td><td>74</td><td>71</td></tr> <tr><td>8</td><td>OP20A</td><td>51</td><td>49</td><td>51</td><td>51</td><td>50</td></tr> </tbody> </table>		Month	Pt A OP19A	Pt B OP20A	Pt C OP08A	1	05/10/16	8.2	3.3	3.4	2	05/10/17	0.0	0.0	1.5	3	05/10/18	0.0	0.0	1.5	4	05/10/19	5.0	0.0	4.0	5	05/12/20	7.8	8.5	2.1	6	05/12/21	9.0	2.0	2.5	7	05/12/22	2.0	2.5	2.5		Field no	02/1	09/1	16/1	23/1	30/1	1	OP08A	35	33	34	35	28	2	OP97C	59	61	62	50	44	3	OP17B	69	67	68	60	63	4	OP08B	48	48	49	41	43	5	OP19A	47	46	47	32	36	6	OP10A	65	64	65	64	64	7	OP17A	76	74	76	74	71	8	OP20A	51	49	51	51	50	
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1	05/10/16	8.2	3.3	3.4																																																																																																						
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3	05/10/18	0.0	0.0	1.5																																																																																																						
4	05/10/19	5.0	0.0	4.0																																																																																																						
5	05/12/20	7.8	8.5	2.1																																																																																																						
6	05/12/21	9.0	2.0	2.5																																																																																																						
7	05/12/22	2.0	2.5	2.5																																																																																																						
	Field no	02/1	09/1	16/1	23/1	30/1																																																																																																				
1	OP08A	35	33	34	35	28																																																																																																				
2	OP97C	59	61	62	50	44																																																																																																				
3	OP17B	69	67	68	60	63																																																																																																				
4	OP08B	48	48	49	41	43																																																																																																				
5	OP19A	47	46	47	32	36																																																																																																				
6	OP10A	65	64	65	64	64																																																																																																				
7	OP17A	76	74	76	74	71																																																																																																				
8	OP20A	51	49	51	51	50																																																																																																				

Criterion / Indicator		Assessment Findings	Compliance																								
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. <b>- Major compliance -</b>	The estates construct terraces at slope area of more than 6 degree if any. Planting of cover crop are made to retain the soil structure and conservation. Roadside pits are made to divert water at slope areas to prevent road erosion and surface damage. Terraces are constructed inclined towards the terrace wall. All the 3 estates visited had land terrain of flat to undulating category.	Complied																								
4.6.1.3	A visual identification or reference system shall be established for each field. <b>- Major compliance -</b>	All fields are marked and identified. Information among others i.e. a) Block number b) Year of planting (field no) c) Type of clone d) And the total hectare is shown in all markers.  There are both stenciled at the palm trees and also displayed in signage at the boundary/corners of every field. This is observed during the field visit. Block numbers were also identified in series. <table border="1"> <thead> <tr> <th>Estate</th> <th colspan="5">Locations of field markers visited</th> </tr> </thead> <tbody> <tr> <td>GTME</td> <td>OP15B</td> <td>OP15C</td> <td>OP16A</td> <td>OP18C</td> <td>OP95F</td> </tr> <tr> <td>GSRE</td> <td>OP19B</td> <td>OP15C</td> <td>OP17B</td> <td>OP17D</td> <td>OP19A</td> </tr> <tr> <td>GSGE</td> <td>P95</td> <td>P09C</td> <td>P15D</td> <td>P01C</td> <td>P13A</td> </tr> </tbody> </table>	Estate	Locations of field markers visited					GTME	OP15B	OP15C	OP16A	OP18C	OP95F	GSRE	OP19B	OP15C	OP17B	OP17D	OP19A	GSGE	P95	P09C	P15D	P01C	P13A	Complied
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<b>Criterion 4.6.2: Economic and financial viability plan</b>																											
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.	The estates audited possessed a similar budget format to the mill. Inclusive there is also a 5-year budget/forecast financial plan 2022-2026 allocating categories among others:	Complied																								

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<p><b>- Major compliance -</b></p>	<ul style="list-style-type: none"> <li>a) Hectarage statement and crop production</li> <li>b) Total planted area mature &amp; immature</li> <li>c) Crop yielding area</li> <li>d) Mature cost               <ul style="list-style-type: none"> <li>- Weeding/ drainage/ pest</li> <li>- Supplying/ roads/ bridges/ paths/ road</li> <li>- Terracing/ pruning/ sanitation</li> </ul> </li> <li>e) Manuring/ harvesting &amp; Collection/ Weeding</li> <li>f) Transportation/ depreciation/ General Charges</li> <li>g) Cost/ha &amp; cost/ mt FFB</li> <li>h) CAPEX</li> </ul> <p>Separately the cost of immature areas is also shown which among others comprises of the following items:</p> <ul style="list-style-type: none"> <li>a) Labour statement/ Allocation of wages/ Labour benefit summary</li> <li>b) Yield statement oil palm</li> <li>c) Summary of vehicle and running schedule/ Job allocation for vehicles</li> <li>d) Summary of workshop running schedule</li> <li>e) Summary of budget</li> <li>f) Summary of general charges</li> <li>g) CAPEX</li> </ul> <p>The five years planning horizon 2022-2026 is available.</p>	

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><b>- Major compliance -</b></p>	<p>The replanting programs for the estates are compiled as follows. The programs are reviewed on an annual basis which is subject to amendment. All figures in hectares otherwise stated.</p> <table border="1"> <thead> <tr> <th></th> <th>Year</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>GTME</td> <td>129.87</td> <td>174.50</td> <td>138.42</td> <td>57.58</td> <td>-</td> </tr> <tr> <td>2</td> <td>GSGE</td> <td>240.20</td> <td>147.10</td> <td>0.00</td> <td>0.00</td> <td>253.29</td> </tr> <tr> <td>3</td> <td>GSRE</td> <td>76.27</td> <td>157.12</td> <td>132.47</td> <td>69.26</td> <td>-</td> </tr> </tbody> </table> <p>Sizes of fields identified for replanting varies subject to factors i.e. hilly, yield etc. All replanting program and planning in all the Group Estates are monitored by the Head Office. Assistance and visits are performed by GM for the approval of hectares, stand per ha etc.</p>		Year	2022	2023	2024	2025	2026	1	GTME	129.87	174.50	138.42	57.58	-	2	GSGE	240.20	147.10	0.00	0.00	253.29	3	GSRE	76.27	157.12	132.47	69.26	-	Complied
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4.6.2.3	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> <li>a) Attention to quality of planting materials and FFB</li> <li>b) Crop projection: site yield potential, age profile, FFB yield trends</li> <li>c) Cost of production: cost per tonne of FFB</li> <li>d) Price forecast</li> <li>e) Financial indicators: cost benefit, discounted cash flow, return on investment</li> </ul> <p><b>- Major compliance -</b></p>	<p>This requirement i.e. crop material, crop projection, yield, production cost are available. It is provided in the business management plan shown in item 4.6.2.1 above. The financial indicators: cost benefits, discounted cash flow, return on investment details are managed and kept in confidentiality at the Head Office level. The estates managed the financial elements through guidance of the approved budget. Deviations are sought to the higher superior level for any additional vote and projects if necessary.</p> <p>The estates possessed a 5-year budget/forecast financial plan 2022-2026 allocating categories among others:</p> <ul style="list-style-type: none"> <li>a) Crop yielding area</li> <li>b) Mature cost</li> <li>c) General charges/ upkeep/ collection/ depreciation</li> <li>d) Cost/ha &amp; cost/ mt FFB</li> <li>e) CAPEX</li> </ul>	Complied																												

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Criterion / Indicator	Assessment Findings	Compliance																																																						
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		Total Planted Ha	2300.78	2300.78	2300.78	2300.78	2300.78	
		FFB Tons GTME	38840	34442	34544	36259	37552	
		FFB Tons GSGE	58758	66516	62288	62565	64108	
		FFB Tons GSRE	52125	51500	49000	48500	50000	
		Yield/ Ha GTME	21.58	21.20	21.40	21.50	21.80	
		Yield/ Ha GSGE	23.66	25.58	25.00	25.00	25.00	
		Yield/ Ha GSRE	26.30	25.40	24.80	25.10	25.70	
		RM/mt FFB	x	x	x	x	x	
		The five years planning horizon 2022-2026 is available.						
<b>4.6.2.4</b>	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. <b>- Major compliance -</b>	<p>The estates performance are recorded in the monthly progress report. Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein.</p> <p>a) The management also provides variance report on the performance and reviewed on a monthly basis.</p> <p>b) The supervisory personnel maintained a daily cost for the field operations.</p> <p>c) The Regional meeting involving the Managers sits monthly with the Head Office, higher management for the performance review.</p>					Complied	
<b>Criterion 4.6.3:</b> Transparent and fair price dealing								



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<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. <b>- Major compliance -</b>	This is available in the guidelines LOA (limit of authority) and revised sourcing method for plantation procurement. All tender and pricing exercises are handled by the HQ management. Projects are tendered from the approved vendors registered with HQ. Payments are processed and made by HQ through system named LINTRAMAX. This is made upon job verification by the mill personnel. To date no complaints were received from the vendor/supplier on issues relating to pricing and timing of payment.	Complied																																													
<b>4.6.3.2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	<p>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 estates. Sighted contract for the following work/project engaged between estates and vendors.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Vendor</th> <th>Works /projects</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>GTME</td> <td>S Tiren Sdn Bhd</td> <td>FFB transportation to mill</td> <td>31/12/23</td> </tr> <tr> <td>2</td> <td>GTME</td> <td>VJC Enterprise</td> <td>Rental/Services of JCB</td> <td>31/12/23</td> </tr> <tr> <td>3</td> <td>GSGE</td> <td>Hiap Soon Trading</td> <td>FFB transportation to mill</td> <td>31/12/23</td> </tr> <tr> <td>4</td> <td>GSGE</td> <td>SRGD Enterprise</td> <td>FFB Harvesting</td> <td>31/12/23</td> </tr> <tr> <td>5</td> <td>GSGE</td> <td>LL Piow Enterprise</td> <td>FFB Harvesting</td> <td>31/12/23</td> </tr> <tr> <td>6</td> <td>GSRE</td> <td>Bengkil Harapan</td> <td>FFB transportation to mill</td> <td>31/12/23</td> </tr> <tr> <td>7</td> <td>GSRE</td> <td>GJS Agrotech Ent</td> <td>FFB Harvesting</td> <td>31/12/23</td> </tr> <tr> <td>8</td> <td>GSRE</td> <td>SRGD Enterprise</td> <td>FFB Harvesting</td> <td>31/12/23</td> </tr> </tbody> </table> <p>Inclusive in the MOA (Memorandum of Agreement) contract among others are:</p> <ul style="list-style-type: none"> <li>a) Clause 2.3 a - 2.3d - Contractors to comply with laws</li> <li>b) Clause 2.2 - Payment term and condition.</li> </ul>		Estate	Vendor	Works /projects	Validity	1	GTME	S Tiren Sdn Bhd	FFB transportation to mill	31/12/23	2	GTME	VJC Enterprise	Rental/Services of JCB	31/12/23	3	GSGE	Hiap Soon Trading	FFB transportation to mill	31/12/23	4	GSGE	SRGD Enterprise	FFB Harvesting	31/12/23	5	GSGE	LL Piow Enterprise	FFB Harvesting	31/12/23	6	GSRE	Bengkil Harapan	FFB transportation to mill	31/12/23	7	GSRE	GJS Agrotech Ent	FFB Harvesting	31/12/23	8	GSRE	SRGD Enterprise	FFB Harvesting	31/12/23	Complied
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<b>Criterion 4.6.4:</b> Contractor																																																

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4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. <b>- Major compliance -</b>	The management conducted the training for contractor to give awareness regarding to MSPO requirement, latest training was 25/07/2022 and sighted all contractor was attend the training.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	<p>For GSGE, there is 2 contractors have been appointed for loading and transporting of fresh fruit bunch (FFB) and loose fruits which are Sin Huat Membaiki Kereta and Hiap Soon Trading Co. Details of sampling contract agreement as per below:</p> <p>GSGE/TC/23/01/02 The agreement was available dated valid from 1/1/2023 until 31/12/2023. The agreement between Sin Huat Membaiki Kereta &amp; Motor and Genting Sri Gading estate. This contract regarding to Loading and transporting of fresh fruit Bunch (FFB) and loose fruit agreement.</p> <p>For GTME, sampling on contractor that transporting FFB and loose fruit. The agreement as per below:</p> <p>GTME- GTME/TF23/06GME between Ganes a/l Karuppannan and GTME dated 1/1/2023. This contract regarding to FFB transport from estate to Mill.</p> <p>GSRE, there are 3 contractors, 2 contractors for harvesting and 1 for transporting FFB to GAIPOM. Sampling as per below:</p> <p>GSRE/TC/23/01/01 between Bengkil Harapan and GSRE dated 1/1/2023 valid for 1 year. This contract regarding to FFB transportation.</p> <p>And another one was, contract GSRE/HA/23/01/02 between SRGD Enterprise dated 1/1/2023 valid for 1 year. This contract pertaining to FFB harvesting. All contracts have been verified and evidence was available at sample estate.</p>	Complied

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<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. <b>- Minor compliance -</b>	All estates contractor under Genting Plantations Berhad has no objection to allow BSI auditors to verify the assessment through physical inspection if required. Verified as per interview and document reviewed.	Complied
<b>4.6.4.4</b>	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. <b>- Major compliance -</b>	In GSGE, From the invoice T0524 dated 31/12/2022 have been sent by contractor to GSGE and payment been made on 17/01/2023 as per transaction record 531072240100001 with total RM 31,733.18. In GSRE, invoice BH23/0108 dated 31/01/2023 from Bengkil Harapan and payment been made on 8/2/2023.	Complied
<b>4.7 Principle 7: Development of new planting (Not Applicable because no new planting in Sampling estate)</b>			
<b>Criterion 4.7.1: High biodiversity value</b>			
<b>4.7.1.1</b>	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. <b>- Major compliance -</b>	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
<b>4.7.1.2</b>	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia’s National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. <b>- Major compliance -</b>	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable

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<b>Criterion 4.7.2: Peat Land</b>			
<b>4.7.2.1</b>	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. <b>- Major compliance -</b>	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
<b>Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)</b>			
<b>4.7.3.1</b>	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. <b>- Major compliance -</b>	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
<b>4.7.3.2</b>	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. <b>- Major compliance -</b>	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
<b>4.7.3.3</b>	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. <b>- Major compliance -</b>	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
<b>4.7.3.4</b>	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.	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

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- Minor compliance -			
<b>Criterion 4.7.4:</b> Soil and topographic information			
<b>4.7.4.1</b>	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
<b>4.7.4.2</b>	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
<b>Criterion 4.7.5:</b> Planting on steep terrain, marginal and fragile soils			
<b>4.7.5.1</b>	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
<b>4.7.5.2</b>	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
<b>4.7.5.3</b>	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 / Indicator		Assessment Findings	Compliance
<b>Criterion 4.7.6:</b> Customary land			
<b>4.7.6.1</b>	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. <b>- Major compliance -</b>	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
<b>4.7.6.2</b>	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. <b>- Minor compliance -</b>	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
<b>4.7.6.3</b>	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. <b>- Major compliance -</b>	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
<b>4.7.6.4</b>	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. <b>- Major compliance -</b>	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
<b>4.7.6.5</b>	Identification and assessment of legal and recognised customary rights shall be documented. <b>- Major compliance -</b>	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
<b>4.7.6.6</b>	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. <b>- Major compliance -</b>	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
<b>4.7.6.7</b>	The process and outcome of any compensation claims shall be documented and made publicly available. <b>- Major compliance -</b>	No new planting was observed or planned by the management. Thus, this principle is not applicable.	Not Applicable
<b>4.7.6.8</b>	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. <b>- Minor compliance -</b>	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
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	Policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	Genting Plantations Berhad has established MSPO Policy signed by the President and Chief Operating Officer, Mr Yong Chee Kong dated 01/07/2015. Stated in the policy that management is committed to the 3 pillars of sustainable development which are people, planet and profit. The management also endeavor to established and maintain an effective sustainability management system and to ensure compliance with MSPO and MPOB code of practices requirement.  The policy was communicated to the employee through training, briefing and displayed on notice board at several strategic places in the operating unit. Latest briefing to all workers was on 10/01/2022.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. <b>- Major compliance -</b>	Stated in the MSPO policy that has been established that the management is committed to continue to assess and develop new and innovative techniques, approaches and practices with the objective of continuous improvement in our journey towards achieving sustainable palm oil.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			



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<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	Internal audit already been planned by the HQ level and conducted accordingly. Record for Genting Ayer Item POM was available dated 5-6/12/2022 by P. Sivaji Raja (Sr. Manager – Sustainability). There 1 OFI been raised under 4.1.4.1.	Complied
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. <b>- Major compliance -</b>	Genting Plantations Berhad has established SOP for Sustainability Internal Audit documented in Sustainability Management Procedure Manual, Sustainability Internal Audit. Refer doc. no. SMP-GPB-03, rev. 05 dated 09/2020.	Complied
<b>4.1.2.3</b>	Reports shall be made available to the management for their review. <b>- Major compliance -</b>	Internal audit results for all operating units have been documented in the document title “RSPO, MSPO & ISCC Internal audit report”.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. <b>- Major compliance -</b>	Management review has been done for all operating units under southern region on 16/01/2023 through online platform MS Teams. Meeting minutes was available where the agenda that discussed as below: <ol style="list-style-type: none"> <li>1. Results of internal audits covering RSPO, MSPO &amp; SCCS</li> <li>2. Process performance and product conformity</li> <li>3. Customer feedback</li> <li>4. Status of preventive and corrective actions</li> <li>5. Follow-up actions from management reviews</li> <li>6. Changes that could affect the management system</li> <li>7. Recommendations for improvement</li> </ol>	Complied

Criterion / Indicator		Assessment Findings	Compliance																								
		8. Improvement of the effectiveness of the management system and processes 9. Complaint and grievances 10. Resources needs																									
<b>Criterion 4.1.4 – Continual Improvement</b>																											
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. <b>- Major compliance -</b>	<p>The mill had the following projects in the forthcoming 5 years in the CAPEX as part of the process continuous plan.</p> <table border="1"> <thead> <tr> <th></th> <th>Section</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Social</td> <td>Rehabilitation workers quarters 24 units RM100K</td> </tr> <tr> <td>2</td> <td>Social</td> <td>Mill circuit road 2023 - RM100K - 04KM</td> </tr> <tr> <td>3</td> <td>Operations</td> <td>New Sterilizer 3 units &amp; EFB Plant RM1.35M</td> </tr> <tr> <td>4</td> <td>Operations</td> <td>EFB Press 3 units RM900K</td> </tr> <tr> <td>5</td> <td>Safety</td> <td>Upgrading mill complex roofing 2024 RM400K</td> </tr> <tr> <td>6</td> <td>Operations</td> <td>New Water treatment Plant 2024 - RM1.5M</td> </tr> <tr> <td>7</td> <td>Social</td> <td>SAJ Water Supply Project 2024 - RM1M</td> </tr> </tbody> </table> <p>The mil has established the continuous improvement plan in consideration of environmental and social impacts. Among the sampled continuous improvement plan as follows</p> <ul style="list-style-type: none"> <li>a) To receive and act on any environmental complaints through internal and external communications</li> <li>b) Reuse production waste for process stability</li> <li>c) Supply biomass waste as fertilizer for estate/mill</li> <li>d) Recycling of bunch ash as fertilizer</li> <li>e) To build up and maintain good relation with stakeholder and surrounding communities via program conducted by oil mill</li> </ul>		Section	Details	1	Social	Rehabilitation workers quarters 24 units RM100K	2	Social	Mill circuit road 2023 - RM100K - 04KM	3	Operations	New Sterilizer 3 units & EFB Plant RM1.35M	4	Operations	EFB Press 3 units RM900K	5	Safety	Upgrading mill complex roofing 2024 RM400K	6	Operations	New Water treatment Plant 2024 - RM1.5M	7	Social	SAJ Water Supply Project 2024 - RM1M	Complied
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<b>4.1.4.2</b>	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. <b>- Major compliance -</b>	This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the GM and higher Head of Department are transacted during the monthly Managers meetings and emails. Provision of machine and other major requirement are made in CAPEX budget.		Complied																					
<b>4.2 Principle 2: Transparency</b>																									

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements</b>			
<b>4.2.1.1</b>	<p>The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad has developed a Procedure on Requests &amp; Response, document no: SMP-GPB-25, rev no: 00, dated 14/08/2014 where the objective of the procedure is to define management responsibilities to respond constructively and promptly to the information requested by the stakeholders with sufficient objective evidence.</p> <p>Stakeholders will have the information available in appropriate forms and to allow stakeholders participation in decision making in these areas. Estate manager shall seek approval from Head of Sustainability Department or his HOD prior releasing any confidential or sensitive information.</p>	Complied
<b>4.2.1.2</b>	<p>The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p><b>- Major compliance -</b></p>	<p>The management of Genting Plantations Berhad has established internal procedure for transparency and has been documented in the document title "Transparency" document no SMP-GPB-25, revision: 00, dated on 14/08/2014. The objective of this procedure is to define management responsibility to respond constructively and promptly to the information requested by the stakeholders with sufficient objective evidence.</p> <p>Among the information allowed to be made available to the public are as follow:</p> <ul style="list-style-type: none"> <li>a. Land grant</li> <li>b. Policies</li> <li>c. Reports; Environmental Aspect Impact Report, Social Impact Assessment, stakeholder minute meeting, HCV report.</li> <li>d. Management Plan; Pollution Prevention Plan, Continual</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Improvement Plan, Safety & Health Plan. e. Procedure: Complaint & Grievances, Negotiation & Compensation Procedure, Sexual Harassment Procedure.	
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication with the relevant stakeholders. <b>- Major compliance -</b>	Genting Plantations Berhad has developed a Procedure on Complaint & Communication, document no: SMP-GPB-17, rev no: 02, dated 23/02/2018 where the objective of the procedure is to ensure internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties.	Complied
<b>4.2.2.2</b>	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . <b>- Minor compliance -</b>	Chief clerk of each operating units was appointed as the person in charge for communication and grievances.	Complied
<b>4.2.2.3</b>	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. <b>- Major compliance -</b>	List of stakeholders has been maintained by each operating unit and has been classified into 2 categories which are external and internal stakeholders. For internal stakeholders, listed such as contractor, grocery store, workers representative and supplier while for external, it has been listed smallholders, NGOs, government bodies and local communities.	Complied
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. <b>- Major compliance -</b>	An SOP has been established SOP for traceability and documented in Genting Plantations Berhad, Sustainable Management Procedure Manual SMP-GPB-33 revision 00 dated Sept 2020: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability. Therein describing information of FFB flow chart from	Complied

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		<p>harvesting designated block to mill weighbridge (tickets). Extracted samples of the weighbridge records as follows.</p> <ul style="list-style-type: none"> <li>a) 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.</li> <li>b) 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.</li> <li>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. All records of CPO tank sounding are recorded during the 2 shifts operations.</li> </ul>	
<b>4.2.3.2</b>	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p><b>- Major compliance -</b></p>	<p>The mill maintained daily production records as described in 4.2.3.1 above in compliance to the procedure established by the mill. FFB flow chart from the 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.</p> <p>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. All records of CPO tank sounding are recorded during the 2 shifts operations. All records are maintained in the daily production report authorized by the Mill Manager.</p>	Complied
<b>4.2.3.3</b>	<p>The management shall identified and assign suitable employees to</p>	<p>The mill appointed the Sr Assistant Manager Mr Bryan Bong person responsible to implement the traceability system as per</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance																																																															
	implement and maintain traceability system. <b>- Minor compliance -</b>	appointment letter dated 01/07/22 signed by the Mill Manager. The letter was sighted and verified.																																																																
<b>4.2.3.4</b>	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. <b>- Major compliance -</b>	<p>The CPO/CPK weighbridge ticket/despatch note is produced for all transaction to respective buyers. The set of document consists of the following information. Other dispatches of mill produce possess similar information.</p> <p>a) Weighbridge ticket</p> <ul style="list-style-type: none"> <li>- Date / D/O no / Quantity / w/bridge operator name</li> <li>- Date/ weight / FFA / MPOB licence no.</li> <li>- Vehicle no</li> </ul> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>D/O</th> <th>Type</th> <th>Qty/mt</th> <th>Vehicle No</th> <th>Buyer</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>03/02/23</td> <td>34772</td> <td>CPO</td> <td>40.960</td> <td>NBM 1878</td> <td>Mewah Oleo</td> </tr> <tr> <td>2</td> <td>10/01/23</td> <td>09671</td> <td>CPO</td> <td>42.690</td> <td>NBD 6697</td> <td>ISF Sdn Bhd</td> </tr> <tr> <td>3</td> <td>06/01/23</td> <td>04309</td> <td>CPO</td> <td>41.210</td> <td>NCU 5908</td> <td>Carotino SB</td> </tr> <tr> <td>4</td> <td>29/12/22</td> <td>91155</td> <td>CPO</td> <td>44.790</td> <td>JTF 398</td> <td>KLKEO SB</td> </tr> <tr> <td>5</td> <td>27/12/22</td> <td>00281</td> <td>CPK</td> <td>41.190</td> <td>VGJ 1189</td> <td>Unitata SB</td> </tr> <tr> <td>6</td> <td>23/11/22</td> <td>00255</td> <td>CPK</td> <td>40.090</td> <td>JKT 2223</td> <td>PGEO SB</td> </tr> <tr> <td>7</td> <td>17/01/23</td> <td>00006</td> <td>CPK</td> <td>41.150</td> <td>PPH 1689</td> <td>Unitata SB</td> </tr> <tr> <td>8</td> <td>13/02/23</td> <td>00023</td> <td>CPK</td> <td>31.060</td> <td>JML 3222</td> <td>Jin Lee OM</td> </tr> </tbody> </table>		Date	D/O	Type	Qty/mt	Vehicle No	Buyer	1	03/02/23	34772	CPO	40.960	NBM 1878	Mewah Oleo	2	10/01/23	09671	CPO	42.690	NBD 6697	ISF Sdn Bhd	3	06/01/23	04309	CPO	41.210	NCU 5908	Carotino SB	4	29/12/22	91155	CPO	44.790	JTF 398	KLKEO SB	5	27/12/22	00281	CPK	41.190	VGJ 1189	Unitata SB	6	23/11/22	00255	CPK	40.090	JKT 2223	PGEO SB	7	17/01/23	00006	CPK	41.150	PPH 1689	Unitata SB	8	13/02/23	00023	CPK	31.060	JML 3222	Jin Lee OM	Complied
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<b>4.3.1.1</b>	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. <b>- Major compliance -</b>	A mechanism to ensure compliance to legal and other requirement has been documented in Sustainability Management Procedure Manual SMP-GPB-2.	Complied																																																															

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	<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 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" data-bbox="1106 754 1868 1393"> <thead> <tr> <th></th> <th>License/ permit</th> <th>Validity</th> </tr> </thead> <tbody> <tr><td>1</td><td>MPOB license no 500056-704000</td><td>31/01/2024</td></tr> <tr><td>2</td><td>Jabatan Alam Sekitar no 003866</td><td>30/06/2023</td></tr> <tr><td>4</td><td>Meterology Corporation - W/bridge No 01</td><td>07/06/2023</td></tr> <tr><td>4</td><td>Meterology Corporation - W/bridge No 02</td><td>27/07/2023</td></tr> <tr><td>5</td><td>Back Pressure steam receiver PMT 15032</td><td>03/04/2023</td></tr> <tr><td>6</td><td>Boiler No 03 PMD JH 965</td><td>10/07/2023</td></tr> <tr><td>7</td><td>Boiler No 04 PMD JH 80902</td><td>03/04/2023</td></tr> <tr><td>8</td><td>Sterilizer No 01 JH PMT 47883</td><td>11/10/2023</td></tr> <tr><td>9</td><td>Sterilizer No 01 JH PMT 60989</td><td>07/09/2023</td></tr> <tr><td>10</td><td>Sterilizer No 01 JH PMT 63743</td><td>03/04/2023</td></tr> <tr><td>11</td><td>Sterilizer No 01 JH PMT 101</td><td>03/04/2023</td></tr> <tr><td>12</td><td>Air Compressor No 04 PMT 101855</td><td>10/07/2023</td></tr> <tr><td>13</td><td>Air Compressor No 04 PMT 15975</td><td>03/04/2023</td></tr> <tr><td>14</td><td>Steam Receiver PMT 27600</td><td>03/04/2023</td></tr> <tr><td>15</td><td>Air Receiver JH PMT 88211</td><td>03/04/2023</td></tr> <tr><td>16</td><td>KPDNHEP - Diesoline 18200 L</td><td>05/12/2024</td></tr> <tr><td>17</td><td>Lesen Pemasangan Persendirian ref 01574</td><td>11/06/2023</td></tr> <tr><td>18</td><td>BAKAJ - Abstraction of river water ref 034</td><td>31/12/2023</td></tr> </tbody> </table>		License/ permit	Validity	1	MPOB license no 500056-704000	31/01/2024	2	Jabatan Alam Sekitar no 003866	30/06/2023	4	Meterology Corporation - W/bridge No 01	07/06/2023	4	Meterology Corporation - W/bridge No 02	27/07/2023	5	Back Pressure steam receiver PMT 15032	03/04/2023	6	Boiler No 03 PMD JH 965	10/07/2023	7	Boiler No 04 PMD JH 80902	03/04/2023	8	Sterilizer No 01 JH PMT 47883	11/10/2023	9	Sterilizer No 01 JH PMT 60989	07/09/2023	10	Sterilizer No 01 JH PMT 63743	03/04/2023	11	Sterilizer No 01 JH PMT 101	03/04/2023	12	Air Compressor No 04 PMT 101855	10/07/2023	13	Air Compressor No 04 PMT 15975	03/04/2023	14	Steam Receiver PMT 27600	03/04/2023	15	Air Receiver JH PMT 88211	03/04/2023	16	KPDNHEP - Diesoline 18200 L	05/12/2024	17	Lesen Pemasangan Persendirian ref 01574	11/06/2023	18	BAKAJ - Abstraction of river water ref 034	31/12/2023	
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Criterion / Indicator		Assessment Findings		Compliance
		19	BAKAJ - Abstraction of river water ref 064 31/12/2023	
4.3.1.2	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>The Legal Requirements Register (LRR) covers all the necessary regulatory requirements. The LRR for was reviewed annually. The list of applicable legal and other requirements was made available during the assessment and complied in the Sustainability Management Procedure Manual SMP-GPB-22 having revision no. 6. The list comprises of the following sections</p> <ul style="list-style-type: none"> <li>a) Environment/ Safety &amp; Health/ Social</li> <li>b) Best practices &amp; other requirements</li> <li>c) International Standards Requirement</li> </ul> <p>Among others the identified applicable laws and regulations relevant to its operations included the:</p> <ul style="list-style-type: none"> <li>a) Environmental Quality Act 1974 and its Regulations</li> <li>b) Factories and Machinery Act 1967 and its Regulations</li> <li>c) Occupational Safety and Health Act 1994 and its Regulations</li> <li>d) Pesticides Act, 1974</li> <li>e) Worker’s Minimum Standards Housing &amp; Amenities Act, 1990</li> <li>f) Wildlife conservation Act 2010</li> <li>g) Malaysian Palm Oil Board 1998</li> <li>h) Holiday Act 1951</li> <li>i) Land Ordinance (Amended Ordinance)</li> <li>j) Forest Enactment 1968 (Sabah No 2 of 1968)</li> <li>k) Native Courts Ordinance 1992</li> <li>l) Passport Act 1966/ Workers Union Act 1959</li> </ul>		Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>m) Estate Hospital Assistants (Registration) Act 1965</li> <li>n) Petroleum (safety Measures) Act 1984</li> <li>o) Fire Services Act 1984</li> <li>p) Sales Tax Act 1972 – Sabah No 9 of 1972</li> <li>q) Uniform Building By Laws 1986</li> <li>r) Weights And Measures Act 1972 (Act 71) (Amendment 1981)</li> <li>s) Minimum Wages Order 2018</li> <li>t) Drainage and Irrigation Ordinance 1956</li> <li>u) EIA Order 2005/ Wildlife Conservation Enactment 1997</li> <li>v) Employment Insurance Scheme Act 2017</li> <li>w) Movement Control Order 2020</li> <li>x) Windfall Profit Levy OP Amendment Order 2021</li> <li>y) Employment (Amendment) Act 2022</li> <li>z) Min Wages Order 2022</li> </ul>	
<b>4.3.1.3</b>	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p><b>- Major compliance -</b></p>	<p>The Sustainability Department SD, based Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills. SD which is based in <i>Wisma Genting</i> is responsible for tracking any changes to the Acts and Regulations. In addition, the SVP Processing (Malaysia) also played a role in disseminating new Acts &amp; Regulations to all the estates in the Group.</p> <ul style="list-style-type: none"> <li>a) This was made via communication with the publisher of the documents.</li> <li>b) This mechanism was outlined in the procedure.</li> <li>c) The updating of the legal register is made on a periodical basis.</li> </ul>	Complied

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		<p>d) Changes in the legal register if any are communicated to the respective regions.</p> <p>e) The mill had entirely adopted the GPB established documented system for identifying, tracking, accessing and updating the legal requirements. It had ensured that all applicable legal requirements pertaining to MSPO are established, implemented and maintained. The latest revision on the LRR was made dated 27/05/2022 on the following changes:</p> <table border="1"> <thead> <tr> <th></th> <th>Rev date</th> <th>Title</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>27/05/22</td> <td>Min Wages Order 2022</td> <td>Newly added</td> </tr> <tr> <td>2</td> <td>27/05/22</td> <td>Employment (Amendment) Act 2022</td> <td>Revision</td> </tr> <tr> <td>3</td> <td>27/05/22</td> <td>Windfall Profit Levy OP Amendment Order 2021</td> <td>Revision</td> </tr> </tbody> </table>		Rev date	Title	Remarks	1	27/05/22	Min Wages Order 2022	Newly added	2	27/05/22	Employment (Amendment) Act 2022	Revision	3	27/05/22	Windfall Profit Levy OP Amendment Order 2021	Revision	
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3	27/05/22	Windfall Profit Levy OP Amendment Order 2021	Revision																
<b>4.3.1.4</b>	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p><b>- Minor compliance -</b></p>	<p>The Mill Manager appoints the Chief Clerk as the PIC for updating changes in laws at GAIPOM. Respective letter was sighted and verified.</p> <table border="1"> <thead> <tr> <th></th> <th>PIC</th> <th>Designation</th> <th>Date of appointment</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Mohd Isa Karjah</td> <td>Chief Clerk</td> <td>01/01/2020</td> </tr> </tbody> </table>		PIC	Designation	Date of appointment	1	Mohd Isa Karjah	Chief Clerk	01/01/2020	Complied								
	PIC	Designation	Date of appointment																
1	Mohd Isa Karjah	Chief Clerk	01/01/2020																
<b>Criterion 4.3.2 – Lands use rights</b>																			
<b>4.3.2.1</b>	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p><b>- Major compliance -</b></p>	<p>The mill is located in the Genting Sungei Rayat Estate, Sing Mah Division land title under lot no. 227 and 228 with land title no. 96424 The mill complex is 88.7 acres and has been verified base on the estate map.</p>	Complied																

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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. - <b>Major compliance</b> -	The land ownership of the land was reviewed during audit program at Genting Sungei Rayat Estate. Sighted the quit rent paid to Pejabat Tanah Daerah Batu Pahat.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - <b>Major compliance</b> -	Fencing parameters established around the mill building complex to separate the management boundary of GAIE and the mill. The housing and other recreational facilities are located within the same vicinity for ease of employees' management.	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). - <b>Minor compliance</b> -	Mill is situated in the Genting Sungei Rayat Estate, Sing Mah Division, not diminishing any other users' rights. There is no land dispute in the mill compound at the time of audit verified through interviewed with the smallholders and local communities.	Complied
<b>Criterion 4.3.3 – Customary rights</b>			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - <b>Major compliance</b> -	There is no customary land or negotiated agreements 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. - <b>Minor compliance</b> -	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. - <b>Major compliance</b> -	There is no customary land or negotiated agreements at all the sampled estates.	Not applicable

Criterion / Indicator	Assessment Findings	Compliance	
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. <b>- Minor compliance -</b>	SIA was made available to the audit team. The assessment was conducted by Sustainability Department, dated on 28/01/2020 and will be revised every 5 years. The objectives of the assessment were: a. To assess change in social and environmental conditions, which subsequently have impacts on people. b. To access compliance on human rights against company policy and RSPO requirement.  SIA was conducted every 5 year and reviewed on annual basis. It can be further improved to capture any new changes in social and environmental conditions which subsequently have impacts or risks on surrounding communities.	Complied
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented. <b>- Major compliance -</b>	SOP for complaint and grievances was developed and revised on 13/05/2022, document no: SMP-GPB-19. The SOP outlined the system for dealing with complaint and grievances.	Complied
<b>4.4.2.2</b>	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. <b>- Major compliance -</b>	The estates are having a format to record complaints or requests from the stakeholders. Based on the records, all the complaints were lodged by internal stakeholders and generally about defects of housing facility, and request of facility (e.g., transport to town, extension of electricity supply)	Complied

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		Latest complaint was recorded on 10/02/2023, resolved on the same day.	
<b>4.4.2.3</b>	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. <b>- Minor compliance -</b>	The complaint forms were available at the operating unit's office, where the stakeholders can easily access should it be needed. Among the information available in the form is name of requestor/complainant, date of request, details of complaint/grievance, details of action taken including dates and acknowledgement signature of the requestor.	Complied
<b>4.4.2.4</b>	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. <b>- Minor compliance -</b>	Interview with internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure and they had been briefed by the management during stakeholder meeting.	Complied
<b>4.4.2.5</b>	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. <b>- Major compliance -</b>	Record review found that previous complaints and requests including the resolution for the past 24 months were still available to affected stakeholders upon request.	Complied
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
<b>4.4.3.1</b>	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. <b>- Minor compliance -</b>	Operating unit has actively engaged with the stakeholders by inviting them to participate any social activities such as festival celebration. This has verified by interview with the stakeholders. The stakeholders informed that they have seek advice from the management regarding some of the operation issue.	Complied
<b>Criterion 4.4.4: Employees safety and health</b>			

Criterion / Indicator		Assessment Findings	Compliance
<b>4.4.4.1</b>	<p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>The Occupational Safety and Health Policy was established, signed by President and Chief Operating Officer on 01/07/2015. The policy was communicated during Policy briefing from time to time. The policy was displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH personnel from Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees &amp; contractors &amp; visitors. In interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the policy. The latest briefing was on 10/01/2022 by Mr P. Sivaji.</p>	Complied
<b>4.4.4.2</b>	<p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risk of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ul style="list-style-type: none"> <li>i. All employees involved are adequately trained on safe working practices;</li> <li>ii. All precautions attached to products should be properly observed and applied;</li> </ul> </li> <li>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</li> </ul>	<ul style="list-style-type: none"> <li>a) The safety and health policy have been communicated and implemented as per below record training dated 10/01/2022.</li> <li>b) HIRARC was available as per referred SP-MGR-01-F01-0 Rev 02, Issue date 18/2/2022. This HIRARC already included all activity such as steriliser, weighbridge, FFB grading, Loading ramp, Kernel plant, etc.</li> </ul> <p>Noise Risk Assessment Report (NRA(J)/21-01/02) conducted on 26-27/1/2021 and 29/1/2021 by Nur Izzati Binti Salleh (HQ/16/PEB/00/158). The management already conducted audiometric test dated 13/2/2022 with total 87 workers phase by phase until 27/05/2022. The result there are 3 new cases JKKP 7 and already reported 27/07/2022.</p> <p>CHRA also have been conducted on 28/10/2021 as per report JKKP HQ/12/ASS/00/309-2021/003 by QMSPRO Sdn Bhd. Found the implementation the medical surveillance programme 2022 (MS 2022/Genting Oil Mill Sdn Bhd/MS-OCT-NOV 2022) at</p>	Complied

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<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><b>- Major compliance -</b></p>	<p>Poliklinik Intan (RZ Intan Medicare Sdn Bhd). The total workers that involve was 12 workers.</p> <p>c) The training and awareness programme was base on training need analysis conducted by the management team. Each training already been decide through training needs and plan (refer PM-MGR-05-F01-0) dated 2023. The record below was training have been conducted base on their work: Noise awareness conducted on 12/01/2022 Working at height training dated 08/04/2022 Boiler Operation training dated 23/06/2022 POME over flow emergency training dated 23/11/2022 Chemical handling training dated 25/03/2022</p> <p>d) The mill has provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC requirements. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>e) The following manuals contained SOP for chemical handling and used as a procedure in handling chemicals. SOP (safety working instruction) SOP-PRD-14 dated 30 June 2019, to handle the chemical for water testing must be handle by competent person with proper PPE and the test must be conduct at specific area as per requirement. Both were issued from Head Office and used in all operating units within the Group. SDS were kept in the file and workplace through verification during interview.</p> <p>f) The responsible person(s) for workers' safety and health was En Muhamad Izwan as per letter dated 2/1/2023. There also</p>	



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		<p>committee that mill manager already appointed with total 14 person. This included employer representative and employee representative.</p> <p>g) The management already conducted 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. Latest record in GAIOM was 29/11/2022 and previously was on 27/09/2022.</p> <p>h) Genting Ayer Item POM has site specific Plans in the OSH Manual (OM-GPB-04, Rev:0, Dated 1/1/10) including ERP for accident, ERP for Fire, ERP for chemical spillage, maps showing assembly areas and up to date lists of emergency contacts with training conducted to communicate the Plan.</p> <p>i) First aid Training been given by CERT Academy dated 19-20/11/2019. This course title was BOFA-C. attended by 15 person and valid for 3 year as per certificate of each person attended. Another training for First Aid training conducted on 19 - 20/12/2022.</p> <p>j) JKPP 8 was available dated 20/01/2023 under document name JKPP8/98022/2022 with LTA 30.00.</p>	
<b>Criterion 4.4.5: Employment conditions</b>			
<b>4.4.5.1</b>	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad had developed Social Policy, endorsed by President &amp; Chief Operating Officer, dated on 14/09/2020. The company stated their commitment to ensure their workers are treated fairly, equally and with respect according to local, national and ratified international laws. The company shall:</p> <ul style="list-style-type: none"> <li>Respect human rights and support international human rights</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>law.</p> <ul style="list-style-type: none"> <li>• Provide safe and healthy working environment.</li> <li>• Respect the right of workers to join or form legal trade unions.</li> <li>• Not use forced or trafficked labor in their operating units.</li> <li>• Not use any child labor</li> <li>• No discrimination in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.</li> <li>• Not commit any physical abuse, threatened, harassment or verbal abuse towards the employees.</li> </ul>	
<b>4.4.5.2</b>	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad had stated their commitment not to engage in or support discriminatory practice in their Social Policy. Details of the policy is recorded under indicator 4.4.5.1.</p>	Complied
<b>4.4.5.3</b>	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>Genting Plantations Berhad had developed a template for the contract agreement between the company and the employees including foreign employees. The pay and conditions are documented and in accordance with the industry minimum standard. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. During the document verification and interview with the employees, it was confirmed that they were paid in accordance with the legal and industry standards.</p>	Complied

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4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p><b>- Minor compliance -</b></p>	<p>Each operating unit is responsible for arranging contracts for the purpose of goods and services. The contract clearly stated that the contractor must strictly follow all applicable national and ratified international laws.</p> <p>Verification of the payslips confirmed that the employees of contractors were paid in accordance to minimum standard including contribution of EPF and SOCSO.</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><b>- Major compliance -</b></p>	<p>Each operating unit have established workers master list including the contractor workers. The list includes information on the workers name, gender, nationality, identification (passport, permit and Malaysian identify card) and age.</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><b>- Major compliance -</b></p>	<p>Offer letters were issued and acceptance of offer were acknowledged, and copies were kept by the employees. This has been verified through interview with the workers. The terms and conditions such as job scope, salary, termination of employment, annual leave entitlement, were clearly stated in the contract agreement.</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><b>- Major compliance -</b></p>	<p>Estates established a time recording system using Check Roll Book for all employees at different station. The working hours for all employees have been clearly documented in the Check Roll Book as well as their pay slip under OT section to ensure transparent for both employees and employer.</p> <p>Time recording system has been carried out manually on daily basis for field and office staff &amp; executives. For office staff &amp; executives, the working hours are recorded in the Executives &amp; Staff</p>	Complied

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		Attendance List. For field workers, they record the working hours in the Daily Time Record. The overtime working hours always approved by the assistant manager. The documented working hours available in the daily check roll records	
<b>4.4.5.8</b>	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. <b>- Major compliance -</b>	The working hours and break time have been clearly stated in the Employment Contract. Sighted in the Contract Agreement the rate of overtime which is agreed by both parties. There is no complaint received regarding payment or forced to work on overtime during site interview. Working hours: a. Daily rated worker: Monday to Saturday (6.30 am – 2.00 pm), no lunch break but have half hour for refreshment in field. b. Piece rated worker: Monday to Saturday (6.30 am – 4.30 pm), 2.5 hours break in between.	Complied
<b>4.4.5.9</b>	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. <b>- Major compliance -</b>	The overtime rate after 7.5 hours daily rated in (General Work): a. Normal day: 7.5 hours x 1.5 b. Rest day: 7.5 hours x 2.0 c. Public holiday: 7.5 hours x 3.0	Complied
<b>4.4.5.10</b>	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. <b>- Minor compliance -</b>	Each operating unit provides facilities and basic amenities to their employees such as free accommodation, supply of electric & water, free – medical treatment, worshipping facilities, sports facilities, transport allowances for mandora and staff.	Complied

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<b>4.4.5.11</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. <b>- Major compliance -</b>	Residents at all estate housing have access to facilities established by the company, such as health clinic, sports field, community hall, crèche, and places of worship. The mill provides electricity and water to all workers for free.  The mill executive conducts weekly Line-site and Housing Inspection at the Workers Quarters to ensure that the area is maintained at an acceptable standard. Sighted the weekly Line-site and Housing Inspection.	Complied
<b>4.4.5.12</b>	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. <b>- Major compliance -</b>	Sexual Harassment Policy was established and endorsed by the Chief Operating Officer, dated on 03/08/2009.  The committed to strive for a harassment-free environment and avoid behavior that may create an atmosphere of hostility and intimidation of any kind at the workplace. No one should be subjected to any form of sexual harassment while carrying out their duties.  Procedure on Prevention and Eradication of Sexual Harassment at Workplace was established on 11/10/03 and revised on 11/10/13.  Gender Committee meeting was conducted on regular basis. Among the agenda discussed were; previous matter, chairman briefing, briefing on sexual harassment policy & guidelines and others.	Complied
<b>4.4.5.13</b>	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and	Genting Plantations Berhad had developed Social Policy, endorsed by President & Chief Operating Officer, dated on 14/09/2020. The company stated their commitment to ensure their workers are treated fairly, equally and with respect according to local, national and ratified international laws. The company shall: <ul style="list-style-type: none"> <li>• Respect human rights and support international human rights</li> </ul>	Complied

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	negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. <b>- Major compliance -</b>	<p>law.</p> <ul style="list-style-type: none"> <li>• Provide safe and healthy working environment.</li> <li>• Respect the right of workers to join or form legal trade unions.</li> <li>• Not use forced or trafficked labor in their operating units.</li> <li>• Not use any child labor</li> <li>• No discrimination in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.</li> <li>• Not commit any physical abuse, threatened, harassment or verbal abuse towards the employees.</li> </ul>	
<b>4.4.5.14</b>	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. <b>- Major compliance -</b>	Based on verification of the employees' data base extracted from the data system, there was no evidence that children and young persons have been recruited. This is also in-line with the company's SOP.	Complied
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. <b>- Major compliance -</b>	The training programme included the various types of training such as firefighting and fire drill, understanding SDS, first aid training, proper wearing of PPE at high noise level areas and confined spaces. All employees and contractors are appropriately trained. Training matrix and training programme for 2022/23 was established by the Mill management. Training sample as per below: SOM/SOP/ECP for Loading Ramp training dated 12/01/2022 MSPO & RSPO Awareness Training dated 14/02/2022 SOM Training workshop training dated 25/03/2022	Complied

Criterion / Indicator		Assessment Findings	Compliance
		SOP – Rotating machine training 23/03/2022 Scheduled waste training dated 27/06/2022 Domestic waste handling and safety dated 09/06/2022 LOTO system training dated 21/10/2022 Compliant and Grivances dated 23/09/2022 Store management training dated 23/10/2022	
<b>4.4.6.2</b>	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. <b>- Major compliance -</b>	The estate has established the training program for the mill executive, workers and contractors base on training need analysis conducted. The training need analysis was documented in Training Matrix analysis. The analysis was based on job designation and type of training needs for the employee. The training type was divided into 3 type, Core training, Non-core training – theoretical training and non-core training – theoretical and hands on training. The training have been identified and already put for planning.	Complied
<b>4.4.6.3</b>	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure. <b>- Minor compliance -</b>	The POM has training program which updated annually based on training need analysis. The training identified were programmed throughout the year dated Jan 2023.	Complied
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
<b>4.5.1.1</b>	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.	The Group Environmental Policy had been established and implemented for all Mills and Estates. The policy was signed by the President / Chief Operating Officer of Genting Plantations Bhd dated	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>21/12/2009 and displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented along with other Policies through the OSH activities by the on-site Safety Officers and monitored by OSH/Sustainability Unit from Head Office. Included in the Policy among others are the following commitment.</p> <ul style="list-style-type: none"> <li>a) Commitment and protection of the environment according to the applicable laws.</li> <li>b) Establishment of environmental management plan developed from results of aspect and impact analysis, mitigation, monitoring plans and records of implementation with timelines.</li> <li>c) Continual improvement program.</li> <li>d) Awareness through training/ briefing program &amp; session to all employees and stakeholders.</li> </ul> <p>During interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the basic objectives and intention of the Policy.</p>	
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> <li>a) An environmental policy and objectives;</li> <li>b) The aspects and impacts analysis of all operations</li> </ul> <p>- Major compliance -</p>	<p>The mill has identified the environmental objectives for implementation in 2023 among others;</p> <ul style="list-style-type: none"> <li>a) BOD level &lt; 250 ppm.</li> <li>b) Reduce water consumption not more 1.4 m3/mt FFB</li> <li>c) Black smoke not more than 20%</li> </ul> <p>Interviews with the workers and staff during the site visit revealed that the employees had been briefed and understood on the environmental protection in the mill.</p>	Complied



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Criterion / Indicator		Assessment Findings	Compliance																																	
		<p>The aspects and impacts of all operations have been identified and formalized among others as described in the following environment improvement and management plan. It is being reviewed on yearly basis.</p> <table border="1"> <thead> <tr> <th></th> <th>Source</th> <th>Negative Impacts</th> </tr> </thead> <tbody> <tr> <td colspan="3"><b>A Water</b></td> </tr> <tr> <td>1</td> <td>Consumption of water for mill operation/ residence</td> <td>Water wastage</td> </tr> <tr> <td>2</td> <td>Contamination of water with chemical &amp; organic matter</td> <td>Loss of habitat, food resources &amp; breeding</td> </tr> <tr> <td>3</td> <td>into ground water</td> <td>Poor water quality for consumption</td> </tr> <tr> <td>4</td> <td>Pollution from mill operations &amp; effluent</td> <td>Mill waste by product bunch ash/ boiler ash.</td> </tr> <tr> <td>5</td> <td></td> <td>Mill effluent/ POME</td> </tr> <tr> <td colspan="3"><b>B Noise Pollution</b></td> </tr> <tr> <td>1</td> <td>Noise pollution from mill operations</td> <td>Hearing impairment to employees</td> </tr> <tr> <td>2</td> <td colspan="2">GHG Emission</td> </tr> <tr> <td>3</td> <td>Contributions to greenhouse gas emission</td> <td>Emission of methane from POME</td> </tr> </tbody> </table>		Source	Negative Impacts	<b>A Water</b>			1	Consumption of water for mill operation/ residence	Water wastage	2	Contamination of water with chemical & organic matter	Loss of habitat, food resources & breeding	3	into ground water	Poor water quality for consumption	4	Pollution from mill operations & effluent	Mill waste by product bunch ash/ boiler ash.	5		Mill effluent/ POME	<b>B Noise Pollution</b>			1	Noise pollution from mill operations	Hearing impairment to employees	2	GHG Emission		3	Contributions to greenhouse gas emission	Emission of methane from POME	
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<b>4.5.1.3</b>	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>The improvement and mitigation plan as initiated are given in the following table.</p> <table border="1"> <thead> <tr> <th></th> <th>Negative Impact</th> <th>Improvement/Mitigation Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water wastage</td> <td>Optimise usage &amp; reduce wastage</td> </tr> </tbody> </table>		Negative Impact	Improvement/Mitigation Plan	1	Water wastage	Optimise usage & reduce wastage	Complied																											
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		2	Loss of habitat, food resources & breeding	Isolate the treated & contaminated water from discharge to monsoon drain	
		3	Poor water quality for consumption	To ensure the water usage used as necessary to prevent depletion of clean water sources.	
		4	Mill effluent/ POME	To reduce BOD level at final discharge <250 ppm. To prevent overflowing during pumping into flatbeds	
		5	Flooding due to exposure surface for soil erosion by construction	To ensure the surface exposed being covered & well maintained	
		7	Hearing impairment to employees	To control noise generated from mil operation through audiometric monitoring	
				All actions are to be monitored on the indicated frequency shown in the plan.	
<b>4.5.1.4</b>	A programme to promote the positive impacts should be included in the continual improvement plan. <b>- Minor compliance -</b>	This is available and compiled and incorporated in the details as provided in 4.5.1.3 above.		Complied	
<b>4.5.1.5</b>	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. <b>- Major compliance -</b>	A training program is available in the Mill Training Plan 2023 updated on yearly basis and revised as per the management requirement. Included in this plan is the internal and external program. Subjects among others identified related to environment are:		Complied	

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Criterion / Indicator		Assessment Findings				Compliance																																		
			(Mill) subject	Schedule																																				
				1-4	5-9	9-12																																		
		1	Requirement MSPO RSPO	/																																				
		2	ESH policy objective, target & program	/																																				
		3	ESH role & function	/																																				
		4	Legal & other requirement		/																																			
		5	HIRARC & EAI		/																																			
		6	Scheduled waste management			/																																		
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<b>4.5.1.6</b>	<p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p><b>- Major compliance -</b></p>	<p>Environmental issues are also discussed during the weekly briefing &amp; also during the EPMC meetings stakeholders &amp; ESH meetings. Minutes (EPMC dated 30/12/22and 25/11/22) and ESH (25/01/22 and 28/04/22) were sighted and verified.</p>				Complied																																		

Criterion / Indicator		Assessment Findings	Compliance																																				
<b>Criterion 4.5.2:</b> Efficiency of energy use and use of renewable energy																																							
<b>4.5.2.1</b> Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period <b>- Major compliance -</b>	Monthly and annual records on energy consumption for non-renewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Sighted tabulation of data maintained by the mill. <table border="1" data-bbox="1086 678 1809 845"> <thead> <tr> <th></th> <th>Year</th> <th>FFB processed</th> <th>Diesel /mt FFB</th> <th>Ratio</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2019</td> <td>181126</td> <td>53430</td> <td>1.42</td> </tr> <tr> <td>2</td> <td>2020</td> <td>197148</td> <td>56944</td> <td>1.43</td> </tr> <tr> <td>3</td> <td>2021</td> <td>195679</td> <td>26045</td> <td>0.66</td> </tr> <tr> <td>4</td> <td>2022</td> <td>216966</td> <td>27189</td> <td>0.63</td> </tr> </tbody> </table> <p>Performance of /mt FFB above vary from lowest 0.63 to highest 1.43 over span of 4 years. There were variation in baseline figures between the mills in the Group attributed by factors i.e. mill throughput, design, machine line up and technology input, no of diesel engine etc. The Mill had management plan dated Jan 2023 to improve the efficiency of diesel usage and to optimize renewable energy details of which are shown below:</p> <table border="1" data-bbox="1086 1093 1870 1380"> <thead> <tr> <th></th> <th colspan="2">Specific Concerns</th> <th>Management Plan objectives &amp; targets</th> </tr> </thead> <tbody> <tr> <td>1</td> <td rowspan="2">Diesel usage</td> <td>Continuous running engine by tractors/ lorries</td> <td>Drivers to OFF engine where parking is &gt;3 min.</td> </tr> <tr> <td></td> <td>Diesel consumption by gen-set during unstable</td> <td>Maintain operations 3 presses for stable fiber supply to boiler.</td> </tr> </tbody> </table>			Year	FFB processed	Diesel /mt FFB	Ratio	1	2019	181126	53430	1.42	2	2020	197148	56944	1.43	3	2021	195679	26045	0.66	4	2022	216966	27189	0.63		Specific Concerns		Management Plan objectives & targets	1	Diesel usage	Continuous running engine by tractors/ lorries	Drivers to OFF engine where parking is >3 min.		Diesel consumption by gen-set during unstable	Maintain operations 3 presses for stable fiber supply to boiler.	Complied
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				operations/ insufficient fiber supply to boiler	To carry out preventive maintenance to prevent high b/down hrs. To make scheduled boiler inspection.	
		2	GHG Emission (diesel)	Optimum diesel consumption by diesel gen set & mill vehicles	Operating diesel gen set only during non-processing hours. Regular checking on vehicle condition & maintenance upon diesel leaking.	
		3	Internal mill vehicle	FFB cages push in & out	To use winch for FFB cages push in & out from sterilizer & unloading ramp.	
		4	Diesel usage/year	To maintain and reduce diesel consumption	Change diesel gen set to SEB during non-processing hours.	
<b>4.5.2.2</b>	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. <b>- Major compliance -</b>	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel used by contractors, including all transport and machinery operations are available in the mill annual budget. This was sighted in the 2022 annual estimate.				Complied
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible. <b>- Minor compliance -</b>	The fibre and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fibre are delivered to estates for multi-purpose or sold to outside buyers. EFB is used in the estates for mulching. The quantum of fibre and shell produced				Complied

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		from the mill processing is calculated based on the mass ratio i.e. shell and fibre approx. at 6% and 13 % of the FFB respectively. The ratio of fibre/shell utilized in the boiler is recorded as follows:					
			Year	2019	2020	2021	2022
		1	FFB/ mt	181126	197148	195679	216966
		2	Fibre used/mt	36106	27870	36787	40789
		3	Fibre/ shell/ FFB	0.199	0.141	0.188	0.188
<b>Criterion 4.5.3: Waste management and disposal</b>							
<b>4.5.3.1</b>	All waste products and sources of pollution shall be identified and documented. <b>- Major compliance -</b>	All waste and pollution are identified and documented in the Waste Management. The compilation for 2023 was guided by the Sustainability Department applicable to both estates and mills. Details of waste generated and the source arising from the mill operations/activities among others are shown below:					Complied
			Type of waste	Location/Source			
		1	Domestic waste - rubbish	Line sites, office, workshop, store			
		2	Industrial Waste - scrap metal	Workshop operations			
		3	Recyclable Waste - plastic, glass, paper	Line site, office, residential complex			
		4	Scheduled Waste 404 Clinical waste	Clinic			
		5	Scheduled Waste rags, plastics, filters	Mill processing activities Workshop			
		6	Scheduled Waste Spent lubricant & hydraulic oil	Workshop			
		7	Scheduled Waste	Mill processing activities, scheduled waste store.			

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			Disposed containers, bags, equipment contaminated with chemicals (Boiler Treatment)																									
		8	Biomass Waste-Fiber/ Shell Waste from extraction of oil and kernel																									
<b>4.5.3.2</b>	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p><b>- Major compliance -</b></p>	<p>The waste management plan for 2023 was compiled and reviewed annually and has been implemented. Details as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste rubbish</td> <td>Collection/ disposal 2x/week to the MDSR designated landfill.</td> </tr> <tr> <td>2</td> <td>Industrial Waste -Scrap metal</td> <td>Inventory maintained, tender at zone level for sale to licensed contractors.</td> </tr> <tr> <td>3</td> <td>Recyclable Waste -Plastic, glass, paper</td> <td>Storage and later for sale to licensed buyers every quarterly.</td> </tr> <tr> <td>4</td> <td>SW 404 Clinical waste</td> <td>Inventory maintained in the estate. Storage in sharp bin in clinic. Disposal through via the estate.</td> </tr> <tr> <td>5</td> <td>SW rags, plastics, filters</td> <td>Inventory maintained. Storage in scheduled waste store. Disposal to licensed contractor Southern Strength Sdn Bhd.</td> </tr> <tr> <td>6</td> <td>SW Spent lubricant &amp; hydraulic oil</td> <td>Inventory maintained. Storage in scheduled waste store. Disposal to licensed contractor Southern Strength Sdn Bhd.</td> </tr> <tr> <td>7</td> <td>SW Disposed containers, bags, equipment contaminated with</td> <td>Inventory maintained. Storage in SW store. All containers are labeled. Empty containers</td> </tr> </tbody> </table>			Type of waste	Action to be taken	1	Domestic waste rubbish	Collection/ disposal 2x/week to the MDSR designated landfill.	2	Industrial Waste -Scrap metal	Inventory maintained, tender at zone level for sale to licensed contractors.	3	Recyclable Waste -Plastic, glass, paper	Storage and later for sale to licensed buyers every quarterly.	4	SW 404 Clinical waste	Inventory maintained in the estate. Storage in sharp bin in clinic. Disposal through via the estate.	5	SW rags, plastics, filters	Inventory maintained. Storage in scheduled waste store. Disposal to licensed contractor Southern Strength Sdn Bhd.	6	SW Spent lubricant & hydraulic oil	Inventory maintained. Storage in scheduled waste store. Disposal to licensed contractor Southern Strength Sdn Bhd.	7	SW Disposed containers, bags, equipment contaminated with	Inventory maintained. Storage in SW store. All containers are labeled. Empty containers	Complied
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		8	Biomass Waste Fiber/ Shell	Reuse as fuel in the boiler combustion.																																				
		The above initiative and management plan is also a common practice within the industry elsewhere.																																						
<b>4.5.3.3</b>	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005 <b>- Major compliance -</b>	<p>The procedures for handling used chemicals classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by Head Office personnel and implemented in all estates and mills for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows:</p> <p>a) Management of class 2 (and higher) chemical containers. b) Management of fertilizer bags</p> <p>These documents were established on 13/8/2009 (OSH Manual) and 01/8/2013 (Sustainability Manual) and remained effective for practice in all estates and mills. The mill despatched the scheduled waste to Southern Strength Sdn Bhd. with details as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>SW 305</th> <th>SW 322</th> <th>SW 110</th> <th>SW 410</th> <th>SW 409</th> <th>SW 430</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>13/2/22</td> <td>-</td> <td>-</td> <td>0.0174</td> <td>-</td> <td>-</td> <td>0.2015</td> </tr> <tr> <td>2</td> <td>31/1/23</td> <td>0.5706</td> <td>0.0828</td> <td>0.1197</td> <td>-</td> <td>0.1367</td> <td>-</td> </tr> <tr> <td>3</td> <td>15/11/22</td> <td>0.7361</td> <td>0.1246</td> <td>0.0146</td> <td>0.2862</td> <td>0.1456</td> <td>-</td> </tr> </tbody> </table>							Date	SW 305	SW 322	SW 110	SW 410	SW 409	SW 430	1	13/2/22	-	-	0.0174	-	-	0.2015	2	31/1/23	0.5706	0.0828	0.1197	-	0.1367	-	3	15/11/22	0.7361	0.1246	0.0146	0.2862	0.1456	-	Complied
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<b>4.5.3.4</b>	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. <b>- Minor compliance -</b>	Both the estates/mill disposed their domestic waste to the designated landfill located in the host estate. All domestic waste are collected 2x/week by the MDSR management.						Complied																																



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<b>Criterion 4.5.4:</b> Reduction of pollution and emission																										
<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	<p>This is available in the Mill Pollution Prevention Plan 2023. Among others the mill has identified activities producing pollution in the following in the 2023 plan.</p> <table border="1"> <thead> <tr> <th></th> <th>Pollution Source</th> <th>Specific Concern</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1</td> <td rowspan="2">FFB Receiving</td> <td>Air Pollution</td> </tr> <tr> <td>Noise Pollution</td> </tr> <tr> <td rowspan="2">2</td> <td rowspan="2">Vehicle parking area</td> <td>Water &amp; soil pollution due to leakages from vehicles</td> </tr> <tr> <td>Generation of scheduled waste</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">FFB sterilisation</td> <td>Water pollution</td> </tr> <tr> <td>Generation of scheduled waste</td> </tr> <tr> <td rowspan="2">4</td> <td rowspan="2">CPO Clarification</td> <td>Water pollution</td> </tr> <tr> <td>Risk of contaminated CPO with oil</td> </tr> <tr> <td rowspan="2">5</td> <td rowspan="2">Nut cracking &amp; CPK Production</td> <td>Air Pollution</td> </tr> <tr> <td>Water pollution</td> </tr> </tbody> </table> <p>Mainly the mill identified source of pollution from their processing activities at the identified stations.</p>		Pollution Source	Specific Concern	1	FFB Receiving	Air Pollution	Noise Pollution	2	Vehicle parking area	Water & soil pollution due to leakages from vehicles	Generation of scheduled waste	3	FFB sterilisation	Water pollution	Generation of scheduled waste	4	CPO Clarification	Water pollution	Risk of contaminated CPO with oil	5	Nut cracking & CPK Production	Air Pollution	Water pollution	Complied
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<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. <b>- Major compliance -</b>	<p>The action plan/ mitigation measures taken to reduce the identified pollutants are described in the following:</p> <table border="1"> <thead> <tr> <th></th> <th>Pollution Source</th> <th>Action Plan/Mitigation Measures</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>FFB Receiving</td> <td>Regular servicing maintenance of vehicles/ machinery Engine OFF while awaiting entrance to the ramp</td> </tr> </tbody> </table>		Pollution Source	Action Plan/Mitigation Measures	1	FFB Receiving	Regular servicing maintenance of vehicles/ machinery Engine OFF while awaiting entrance to the ramp	Complied																	
	Pollution Source	Action Plan/Mitigation Measures																								
1	FFB Receiving	Regular servicing maintenance of vehicles/ machinery Engine OFF while awaiting entrance to the ramp																								

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Criterion / Indicator		Assessment Findings		Compliance	
			Ensure major traffic areas are away from residential complex, signage on speed limit,		
		2	Vehicle parking area		Tray provided for the drivers to be used underneath their vehicle during stationary. Used gloves & contaminated fibre to treat as scheduled waste.
		3	FFB sterilisation		Install & maintain oil trap at monsoon drains if steriliser condensate is leaking. Discharge steriliser condensate into sludge pit for recovery purposes Used glove & contaminated fibre to treat as scheduled waste.
		4	CPO Clarification		Install & maintain high level siren at sludge tank, hot water tank & CPO tank Channel all spillages to sludge pit for recovery purposes. Recover oil from sludge pit to oil room for reprocessed. Regular service & maintenance of machinery Containment via bunds for machinery/gearbox
		5	Nut cracking & CPK Production		Install cover plate at particular machine e.g. cracker mixture. Reduce the frequency of floor washing.
<b>4.5.4.3</b>	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME	The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal		Complied	

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Criterion / Indicator		Assessment Findings				Compliance																		
	<p>discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p><b>- Major compliance -</b></p>	<p>requirements. No overflow was observed, and flow meter reading was recorded daily. GAIPOM records the effluent monitoring for DOE submission in the '<i>Borang Penyata Suku Tahunan</i>'. (License no 003866) Details as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Parameter</th> <th>Standard</th> <th>04/10/22</th> <th>01/11/22</th> <th>01/12/22</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>5.0-9.0</td> <td>9.00</td> <td>8.50</td> <td>9.20</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>500.00</td> <td>70.00</td> <td>35.00</td> <td>65.00</td> </tr> </tbody> </table> <p>The Mill license was for land application and the requirement is for the BOD to be less than 20mg/l. Effluent samples are analysed in Envilab Sdn Bhd Johor.</p>					Parameter	Standard	04/10/22	01/11/22	01/12/22	1	PH	5.0-9.0	9.00	8.50	9.20	2	BOD	500.00	70.00	35.00	65.00	
	Parameter	Standard	04/10/22	01/11/22	01/12/22																			
1	PH	5.0-9.0	9.00	8.50	9.20																			
2	BOD	500.00	70.00	35.00	65.00																			
<b>Criterion 4.5.5: Natural water resources</b>																								
<b>4.5.5.1</b>	<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> <p>a) Assessment of water usage and sources.</p> <p>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</p> <p>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> <p><b>- Major compliance -</b></p>	<p>The Water Management Plan 2023 for the mill has been established with latest review on Jan 2023. The plan emphasized on the following areas.</p> <p>a) Water source/ Efficient use of water</p> <p>b) Renew-ability of water source</p> <p>c) Avoidance of surface and ground water contamination</p> <p>Details of the action plan and monitoring among others are tabled as follows:</p> <table border="1"> <thead> <tr> <th></th> <th colspan="2">Areas of concerns</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td rowspan="2">Water source</td> <td>Water from catchment pond</td> <td>Supply to residential areas/ complex for all divisions. Use for mill processing and washing.</td> </tr> <tr> <td></td> <td>Rain Harvest</td> <td>Use for general compound and washing.</td> </tr> </tbody> </table>					Areas of concerns		Action Plan	1	Water source	Water from catchment pond	Supply to residential areas/ complex for all divisions. Use for mill processing and washing.		Rain Harvest	Use for general compound and washing.	Complied							
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Criterion / Indicator		Assessment Findings		Compliance	
		2	Efficient use of water	Residential areas	Monitoring of pipes leakages.
				Optimize usage & reduce wastage	Recycle coolant water from engine room back to water system. Reduce floor washing by sweeping.
				Education/training	Promote water conservation/awareness among employees.
		3	Renewability water source	Rainwater capture at catchment	Monitoring of pond level and daily rainfall.
				Rainwater harvest	Collection through gutter and usage for floor cleaning.
		4	Avoidance of surface/ground water contamination	Contamination of surface and ground water through run-off soil, nutrients or chemicals, disposal of POME	Inspection of bund/secondary compartment for CPO, chemical storage area including SW store & machinery.
					Proper arrangement of EFB to estate.
					Land irrigation application for POME discharge
					Educate ERPT during event of spillages.
					To monitor water quality
					To monitor BOD of POME
		Outgoing water into main natural	To maintain good condition of sewage system.		

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Criterion / Indicator		Assessment Findings		Compliance
			<p>waterways be monitored activities with possible negative impact.</p> <p>Drainage system</p> <p>Water pollution control</p>	<p>To ensure landfill &gt;50 m from river/water source to prevent contamination.</p> <p>Maintenance of flatbed/furrow for proper flow.</p> <p>Free flow drains &amp; scheduled maintenance</p> <p>To monitor the water quality for drinking water upstream/ downstream water, boundary water, mill discharge water.</p>
		5	Others	<p>To ensure plantations activities do not cause adverse impacts to water source of local communities, employees &amp; families.</p> <p>To monitor water quality through analysis of hulu/ hilir, boundary &amp; outlet.</p> <p>Monitoring of chemical consumption used for water treatment plant.</p> <p>rainfall,</p> <p>Monitoring of chemical consumption used for water treatment plant.</p> <p>rainfall</p>
<p>Water samples are taken monthly from Sg Linau to trace conformity of indication of being non-polluted. Parameters checked as follows.</p>				

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Criterion / Indicator		Assessment Findings						Compliance																																																								
			Parameter	INQWS limit		Parameter	INQWS limit																																																									
		1	pH	5-9	5	SS	ND																																																									
		2	COD	<100	6	TS	-																																																									
		3	BOD	<12	7	VFA	-																																																									
		4	AN	<2.7	-	-	-																																																									
		<p>The water consumption 2022 used in the mill is recorded and checked against the optimum level. Reasons for the irregularities usage were remarked accordingly. All results were confirmed within the regulatory requirement.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB/mt</th> <th>Water process/L</th> <th>Water L/ mt FFB</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>13300</td><td>27830</td><td>1.55</td></tr> <tr><td>Feb</td><td>15945</td><td>27923</td><td>1.48</td></tr> <tr><td>Mac</td><td>19194</td><td>33790</td><td>1.46</td></tr> <tr><td>April</td><td>18574</td><td>31386</td><td>1.43</td></tr> <tr><td>May</td><td>17862</td><td>29282</td><td>1.32</td></tr> <tr><td>June</td><td>18150</td><td>29321</td><td>1.35</td></tr> <tr><td>July</td><td>18930</td><td>32168</td><td>1.42</td></tr> <tr><td>Aug</td><td>20035</td><td>32757</td><td>1.41</td></tr> <tr><td>Sept</td><td>20222</td><td>34842</td><td>1.52</td></tr> <tr><td>Oct</td><td>19858</td><td>34606</td><td>1.52</td></tr> <tr><td>Nov</td><td>18219</td><td>32235</td><td>1.61</td></tr> <tr><td>Dec</td><td>17574</td><td>34352</td><td>1.71</td></tr> <tr><td>Total</td><td>216967</td><td>380492</td><td>1.48</td></tr> </tbody> </table>						Month	FFB/mt	Water process/L	Water L/ mt FFB	Jan	13300	27830	1.55	Feb	15945	27923	1.48	Mac	19194	33790	1.46	April	18574	31386	1.43	May	17862	29282	1.32	June	18150	29321	1.35	July	18930	32168	1.42	Aug	20035	32757	1.41	Sept	20222	34842	1.52	Oct	19858	34606	1.52	Nov	18219	32235	1.61	Dec	17574	34352	1.71	Total	216967	380492	1.48	
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<b>4.5.5.2</b>	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.	The mill adopts a land application system on furrows. Area of application as stipulated in the DOE <i>Jadual Pematuhan</i> .						Complied																																																								

Criterion / Indicator		Assessment Findings	Compliance				
- Major compliance -							
<b>4.6 Principle 6: Best Practices</b>							
<b>Criterion 4.6.1: Mill Management</b>							
<b>4.6.1.1</b>	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>The SOP for the estates and mill operations are available which is prepared on Group basis. There are levels/types of the documentation identified as follows:</p> <ul style="list-style-type: none"> <li>a. Quality, Environmental, Safety &amp; Health &amp; Sustainability Manual – 01/7/17</li> <li>b. System Procedure – 01/1/2012</li> <li>c. Procedure Manual – 02/1/2018</li> <li>d. SOM Standard Operating Manual – 2013</li> <li>e. Safe Operating Procedure – 01/1/2011</li> <li>f. Environmental Control Procedure – 01/9/2018</li> <li>g. Store Operating Manual – 2014</li> <li>h. Jobs description - 2012</li> </ul> <p>The mill operations are supervised by the staff, Engineers of the Mill. The record of monitoring as per below:</p> <p>Online Environmental Report (OER) Fourth Quarter to DOE dated 1/10/2022 – 31/12/2022 referred JAS.JKL.600-3/1/11</p> <p>Another sampling of implementation was on procedure SMP-GPB-15 Rev: 01 Issue date: 12/11/2014 Title water sampling and analysis monitoring. The record of monitoring was available dated 09/12/2022 Report No: POM11257(A&amp;B).</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">Parameter</td> <td style="width: 25%;">Unit</td> <td style="width: 25%;">Point A</td> <td style="width: 25%;">Point B</td> </tr> </table>	Parameter	Unit	Point A	Point B	Complied
Parameter	Unit	Point A	Point B				

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Criterion / Indicator		Assessment Findings				Compliance
		BOD	mg/L	6	6	
		COD	mg/L	222	224	
		SS	mg/L	44	46	
		AN	mg/L	2.4	2.4	
		Phosphorus	mg/L	3.8	4.1	
<b>4.6.1.2</b>	All palm oil mills shall implement best practices. <b>- Major compliance -</b>	The monitoring of the mill process is made through the shift supervision headed by an Engineer/Executives. All process parameters are documented and summarized in a daily report. The external monitoring is made through visits i.e. SVP and the mill management team.				Complied
<b>Criterion 4.6.2:</b> Economic and financial viability plan						
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. <b>- Major compliance -</b>	<p>The business plan for the mill is presented in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, PK and, operational &amp; maintenance cost and CAPEX.</p> <p>The business or management plan for the estates were presented in the form of annual budget with 5 years projection. The annual budget contains the crop projection and the finance allocation for field operation &amp; administrations and CAPEX.</p> <p>The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p>				Complied
<b>Criterion 4.6.3:</b> Transparent and fair price dealing						
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented.	The business plan for the mill is presented in the form of annual budget and the projection for 5 years prepared as guidance for				Complied



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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>future planning. The business plan contains production CPO, PK and, operational &amp; maintenance cost and CAPEX.</p> <p>The business or management plan for the estates were presented in the form of annual budget with 5 years projection. The annual budget contains the crop projection and the finance allocation for field operation &amp; administrations and CAPEX.</p> <p>1. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p>	
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>The business plan for the mill is presented in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, PK and, operational &amp; maintenance cost and CAPEX.</p> <p>The business or management plan for the estates were presented in the form of annual budget with 5 years projection. The annual budget contains the crop projection and the finance allocation for field operation &amp; administrations and CAPEX.</p> <p>The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p>	Complied
<b>Criterion 4.6.4: Contractor</b>			
4.6.4.1	<p>In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p>	<p>The management conducted the training for contractor to give awareness regarding to MSPO requirement, latest training was 09/06/2022 and sighted all contractor was attend the training.</p>	Complied

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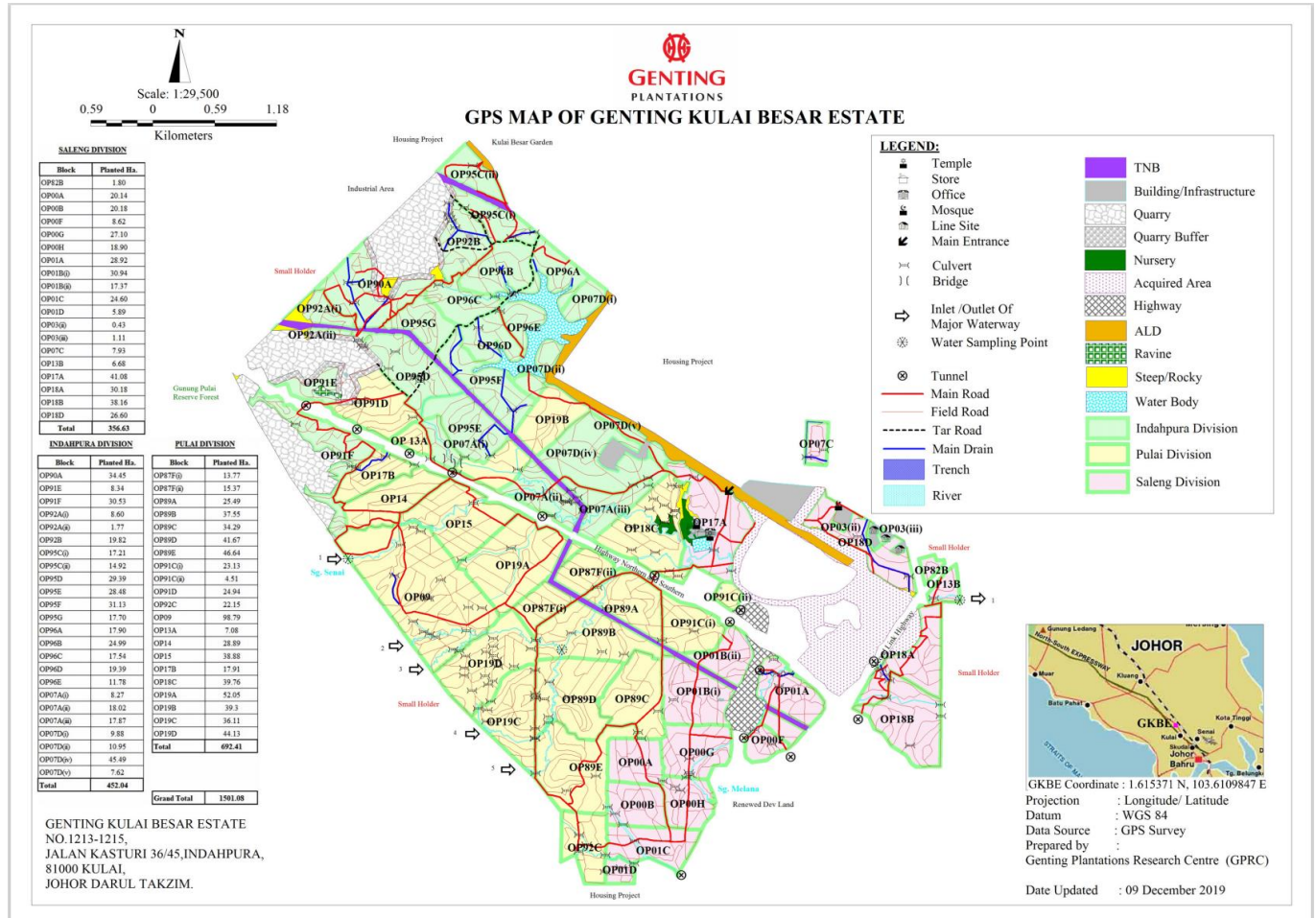
Criterion / Indicator		Assessment Findings	Compliance
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	The contractor for GAIOM is transporter for CPO only. There are 2 contractors. The contract was sighted with agreed and approval contract from both parties. Sighted sampled contract between: 1. Makmur Transport Sdn. Bhd. and Genting Oil Mill Sdn. Bhd. dated 01/03/2021 until 28/02/2023. 2. Teo Tuan Kwee Sdn. Bhd. and Genting Oil Mill Sdn. Bhd. dated 01/11/2021 until 30/10/2023.	Complied
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. <b>- Minor compliance -</b>	All contractor was aware and no objection to allow BSI auditors to verify the assessment through physical inspection if required.	Complied



**Appendix C: Location and Field Map**

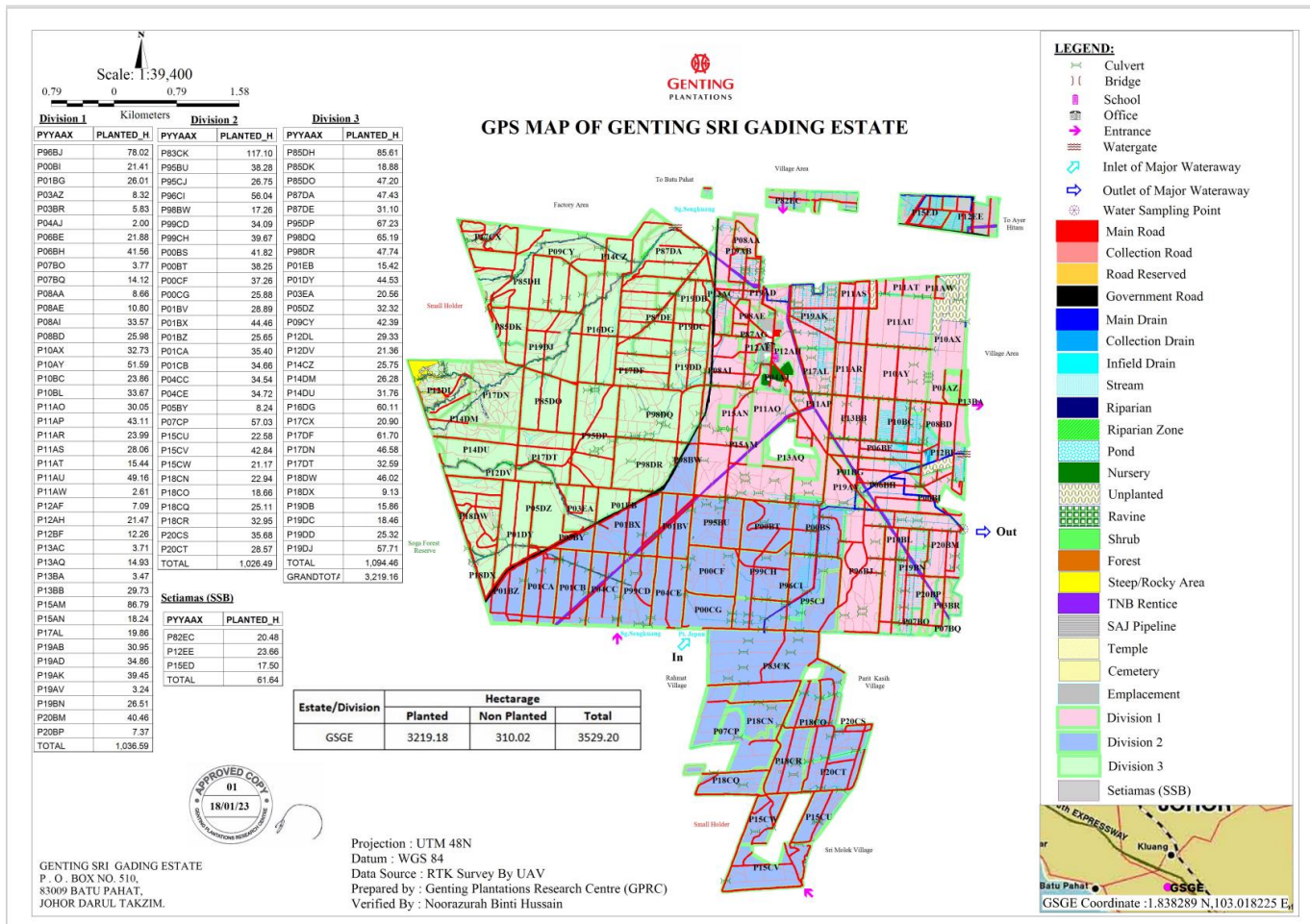


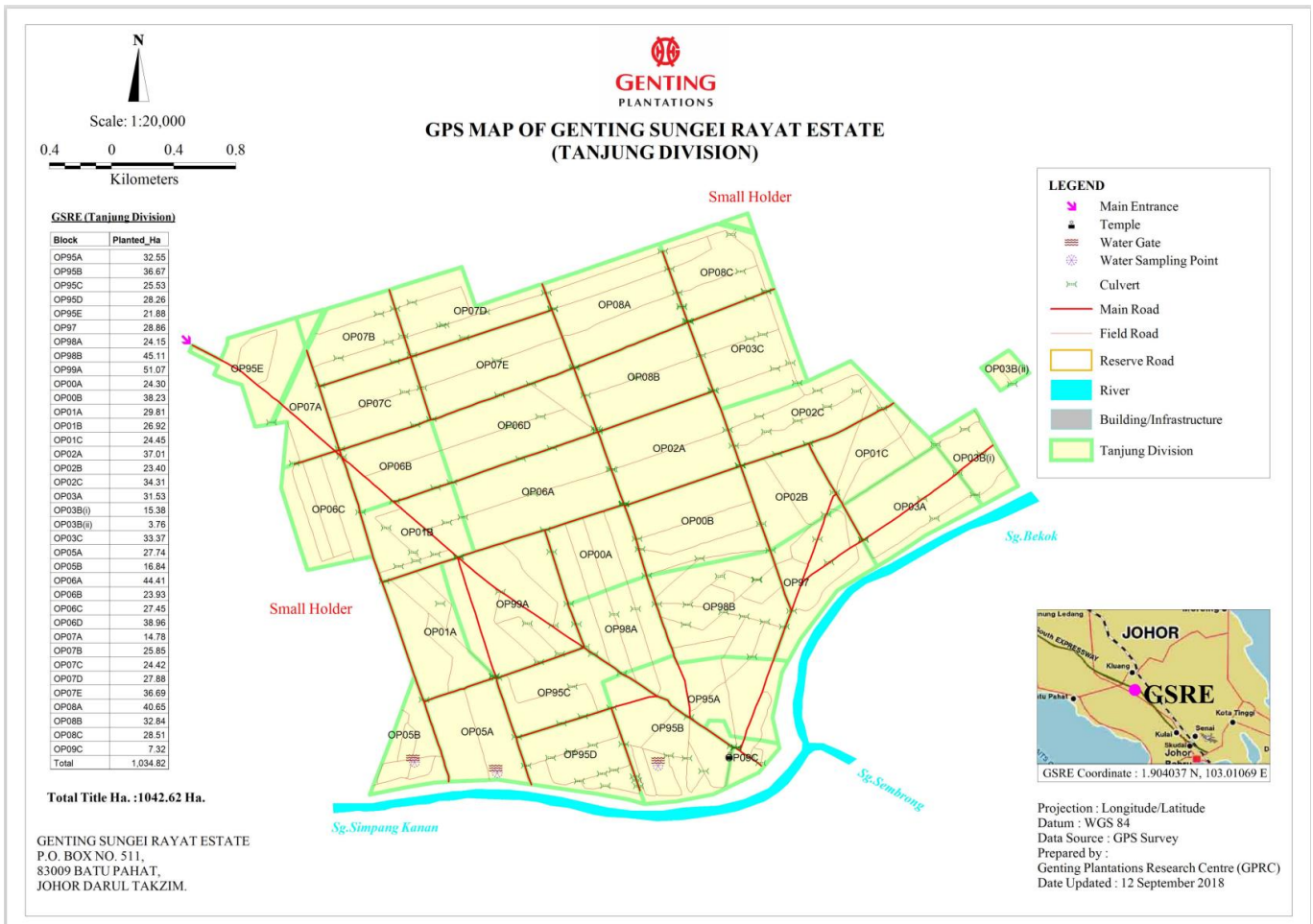
**Estate Map**

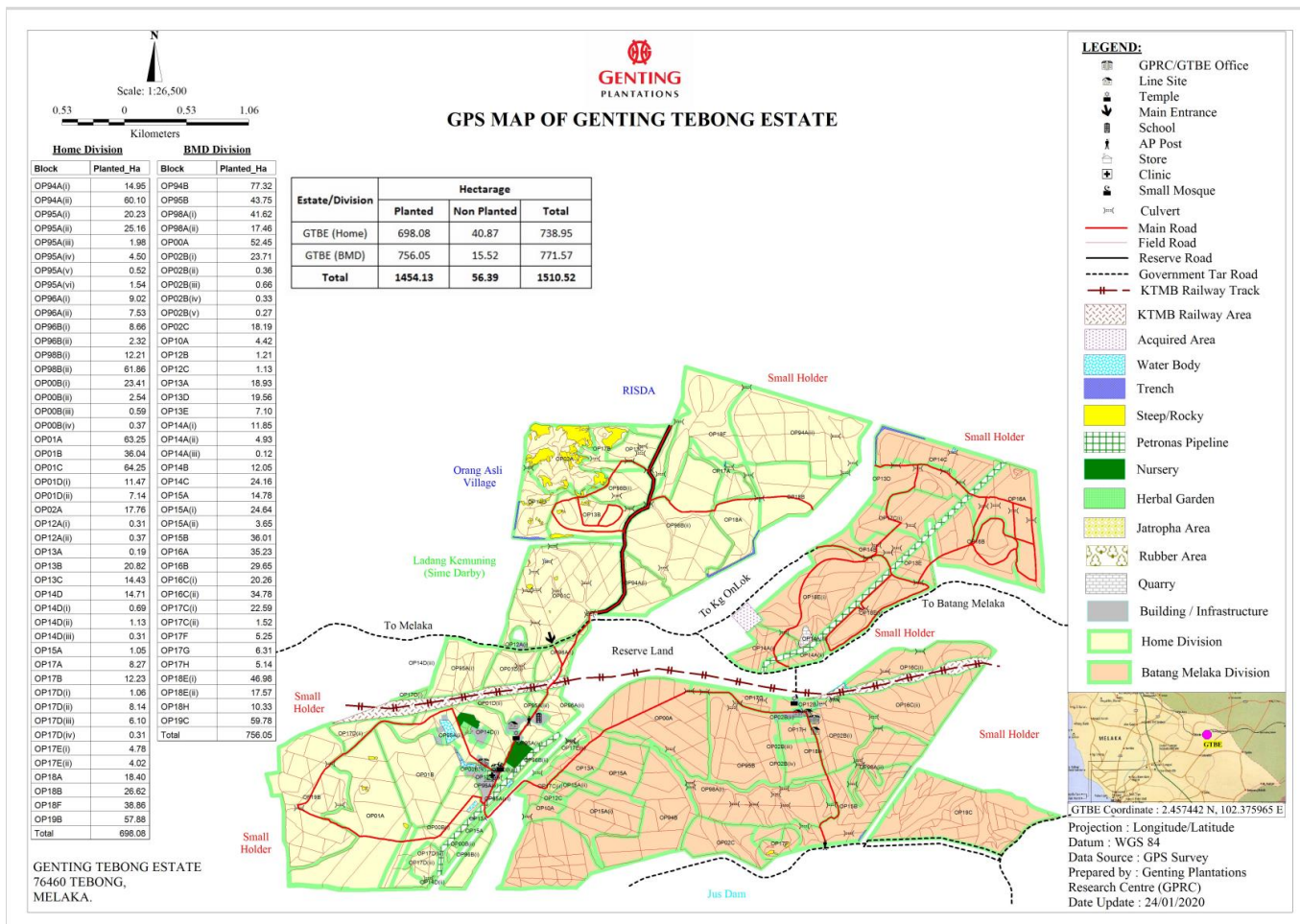




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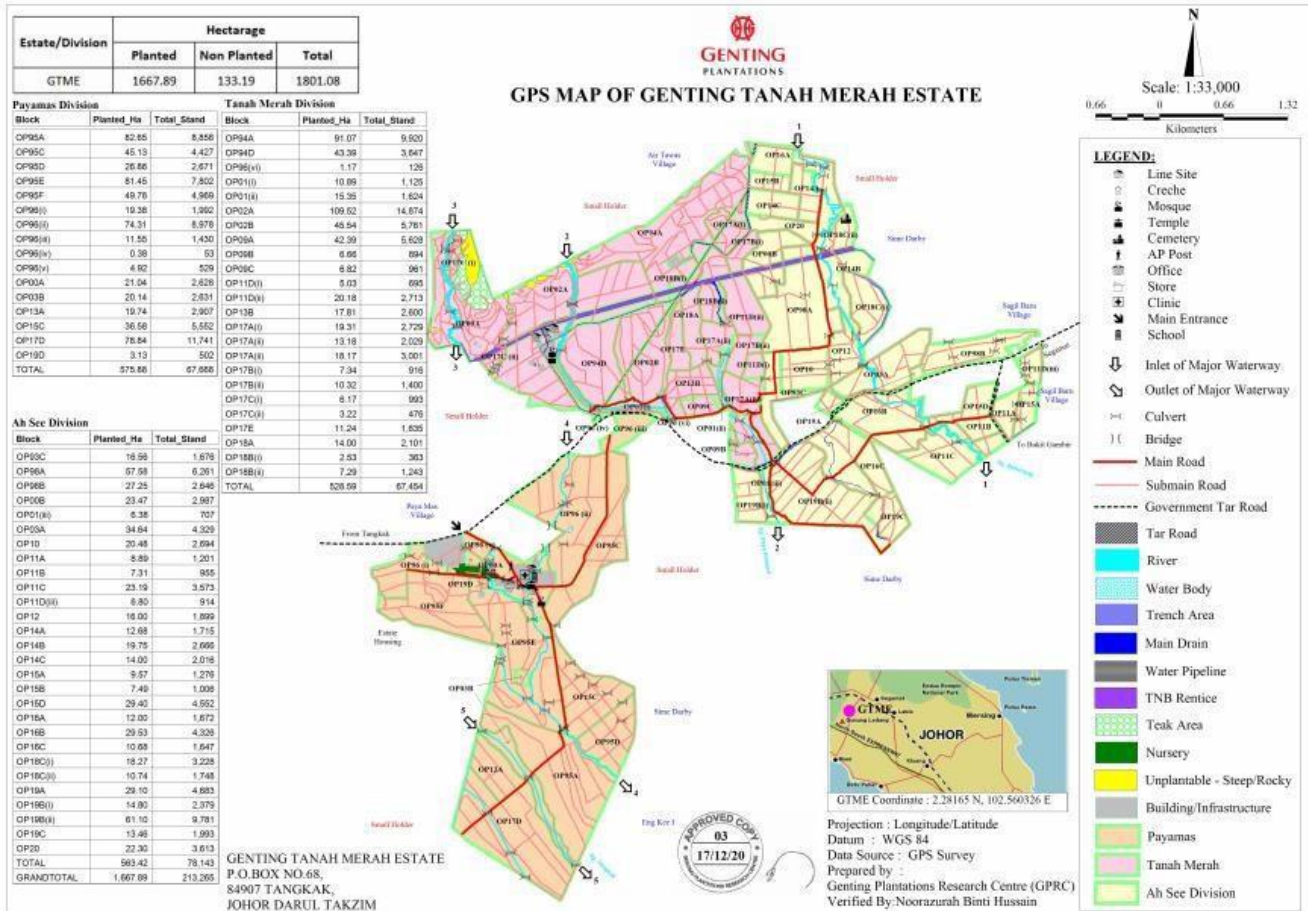








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**Appendix D: List of Abbreviations**

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