

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

- Initial Assessment
- Annual Surveillance Assessment (4)
- Recertification Assessment (Choose an item.)
- Extension of Scope

<b>FGV HOLDINGS BERHAD</b>
Client Company (HQ) Address: Plantation Sustainability Department Level 20 (W), Wisma FGV Jalan Raja Laut, 50350 Kuala Lumpur, Malaysia
Certification Unit: FGV Palm Industries Sdn Bhd - Keratong 3 Palm Oil Mill & FGV Plantations (Malaysia) Sdn Bhd - Keratong 11 Estate
Date of Final Report: 10/01/2023

**Report prepared by:**  
**Nor Halis Abu Zar** (Lead Auditor)

**Report Number: 3511535**

**Assessment Conducted by:**  
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### Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
<b>Company Name</b>	FGV Holdings Berhad		
<b>Mill/Estate</b>	<b>Certification Unit</b>	<b>MPOB License No.</b>	<b>Expiry Date</b>
	FGVPISB Keratong 3 POM	500194604000	31/03/2023
	FGVPM Keratong 11 Estate	558962002000	28/02/2023
<b>Address</b>	Plantation Sustainability Department, Level 20 (W), Wisma FGV, Jalan Raja Laut, 50350 Kuala Lumpur, Malaysia		
<b>Management Representative</b>	Mr Ameer Izyanif Bin Hamzah		
<b>Website</b>	www.feldaglobal.com	<b>E-mail</b>	ameer.h@fgvholdings.com
<b>Telephone</b>	+603-2789 1338	<b>Facsimile</b>	+603-2789 0001

1.2 Certification Information			
<b>Certificate Number</b>	Mill: MSPO 693214 Estate: MSPO 693216	<b>Certificate Start Date</b>	06/12/2018
<b>Date of First Certification</b>	06/12/2018	<b>Certificate Expiry Date</b>	05/12/2023
<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>	<p>The objective of the assessment was to conduct an Annual Surveillance Assessment - ASA 4 and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organisation's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.</p>		
<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>Stage 1 Date</b>	22/05/2018		
<b>Stage 2 / Initial Assessment Visit Date (IAV)</b>	20-21/09/2018		
<b>Continuous Assessment Visit Date (CAV) 1</b>	03-04/12/2019		
<b>Continuous Assessment Visit Date (CAV) 2</b>	03-04/12/2020		
<b>Continuous Assessment Visit Date (CAV) 3</b>	02-03/12/2021		

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<b>Continuous Assessment Visit Date (CAV) 4</b>	29/11 - 02/12/2022
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<b>1.3 Other Certifications</b>			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
RSPO 693213	RSPO Principles & Criteria for Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019.	BSI Services Malaysia Sdn Bhd	24/03/2024
MSPO SCCS - TCI -031-2020	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018.	Trans Certification International Sdn. Bhd.	26/03/2025

<b>1.4 Location of Certification Unit</b>			
<b>Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)</b>	<b>Site Address</b>	<b>GPS Reference of the site office</b>	
		<b>Latitude</b>	<b>Longitude</b>
FGVPISB Keratong 3 POM	Kilang Sawit Keratong 3, 26900 Muadzam Shah, Pahang, Malaysia	2° 55' 41.20" N	102° 56' 02.90" E
FGVPM Keratong 11 Estate	Gugusan Felda Keratong, Ladang FGVPM Keratong 11, 26700 Muadzam Shah, Pahang, Malaysia	2° 53' 08.20" N	103° 01' 06.60" E

<b>1.5 Certified Area</b>					
<b>Estate</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
FGVPM Keratong 11 Estate	984.24	0.00	212.16	1,196.40	82.27
<b>Total (ha)</b>	<b>984.24</b>	<b>0.00</b>	<b>212.16</b>	<b>1,196.40</b>	<b>82.27</b>

<b>1.6 Plantings &amp; Cycle</b>							
<b>Estate</b>	<b>Age (Years)</b>					<b>Mature</b>	<b>Immature</b>
	<b>0 - 3</b>	<b>4 - 10</b>	<b>11 - 20</b>	<b>21 - 25</b>	<b>26 - 30</b>		
FGVPM Keratong 11 Estate	467.20	287.28	129.50	100.26	-	517.04	467.20
<b>Total (ha)</b>	<b>467.20</b>	<b>287.28</b>	<b>129.50</b>	<b>100.26</b>	<b>-</b>	<b>517.04</b>	<b>467.20</b>

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1.7 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Dec 2021 - Nov 2022)	Actual (Nov 2021 - Nov 2022)	Forecast (Dec 2022 - Nov 2023)
FGVPM Keratong 11 Estate	10,350.00	4,460.00	7,450.00
<b>Total (mt)</b>	<b>10,350.00</b>	<b>4,460.00</b>	<b>7,450.00</b>

Note: Low FFB Production due to shortage of Harvester and High Harvesting round resulting from Pandemic.

1.8 Uncertified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Dec 2021 - Nov 2022)	Actual (Nov 2021 - Nov 2022)	Forecast (Dec 2022 - Nov 2023)
FELDA & FTP	174,650.00	199,323.52	207,150.00
Private Supplier	60,000.00	14,244.72	7,700.00
<b>Total (mt)</b>	<b>234,650.00</b>	<b>213,568.24</b>	<b>214,850.00</b>

1.9 Certified Tonnage			
Mill Capacity: 40 MT/hr  SCC Model: MB	Estimated (Dec 2021 - Nov 2022)	Actual (Nov 2021 - Nov 2022)	Forecast (Dec 2022 - Nov 2023)
	<b>FFB</b>	<b>FFB</b>	<b>FFB</b>
	10,350.00	4,460.00	7,450.00
	<b>CPO (OER: 21.00%)</b>	<b>CPO (OER: 20.37%)</b>	<b>CPO (OER: 21.66%)</b>
	2,173.00	908.50	1,538.87
	<b>PK (KER: 5.30%)</b>	<b>PK (KER: 5.10%)</b>	<b>PK (KER: 5.25%)</b>
	548.55	227.46	391.12

1.10 Actual Sold Volume (CPO)					
CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
908.50	-	-	-	908.50	908.50

1.11 Actual Sold Volume (PK)					
PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
227.46	-	-	-	227.46	227.46

## Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

### Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 29/11/2022 to 02/12/2022. The audit programme is included as Section 2.3. The approach to the audit was to treat the FGVPISB Keratong 3 POM and FGVPK Keratong 11 Estate as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

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

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.6.

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

All the previous nonconformities are remains closed. The assessment findings from the initial assessment are detailed in Section 4.2. Major non-conformity been closed off-site, and all evidence were sufficient.

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.

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

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

**Tentative Date of Next Visit: November 27, 2023 - November 30, 2023**

**Total No. of Mandays: 7 Mandays**

**2.1 BSI Assessment Team**

Team Member Name	Role	Qualifications
Nor Halis Abu Zar (NHA)	Team Leader	<p><b>Education:</b> Bachelor of Science, Plantation Technology and Management, graduated from Universiti Teknologi Mara in 2012.</p> <p><b>Work Experience:</b> He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day-to-day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for MS 2530:2013 and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p><b>Training attended:</b> He has completed ISO IMS 9001 and 14001 Lead Auditor Course in January 2019, MSPO 2530:2013 Lead Auditor Course in February 2019, Endorsed RSP0 Lead Auditor Course in October 2020, CQI and IRCA Certified ISO 45001 Lead Auditor Course in June 2021, ISO 9001:2015 Lead Auditor Course in April 2019, MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training on May 2021.</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of policy, legal, social issue and financial development.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Malaysia and English language.</p>
Yusof Khairan Nizar (YKN)	Team Member	<p><b>Education:</b> Diploma in Public Administration-ITM (1991), Certificate of Safety and Health Officer-MII (2003). Bachelor of Corporate Administration (Hons)-</p>

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		<p>UiTM (2003), Master of Science (Occupational Safety and Health) Management-UUM (2011).</p> <p><b>Work Experience:</b> 17 years experiences working Japanese MNC in Manufacturing Silicone, Rubber and plastic products and components. Registered SHO with DOSH Malaysia. 16 years experiences working as Consultants, Trainers and Auditors with local, international CBs. 4 years experiences as HSE Advisors with Telco Company. Contract Trainer of OSH &amp; Environment, HSE Legal &amp; Other Requirements, Lead Auditors course for STS &amp; NIOSH Cert. Approved (HRDF) Trainer. Assessor for Prime Minister’s Hibiscus Award.</p> <p><b>Training attended:</b> Successfully attended course ISO 9001 IRCA/IATC A Lead Auditor Training-IMTL (Kuala Lumpur), ISO 14001 IEMA Approved EMS Advanced Lead Auditor Training Course-Aspects Moody Certification Ltd (UK). OH&amp;SMS IRCA Certified Lead Auditor Training Course-Moody International (KL). MS 1722 Lead Auditor Training NIOSH Cert. (KL), MSPO Auditing – SGS (Malaysia). RSPO P&amp;C 2018 Refresher Lead Auditor Course – Checkmark Training. Also attended the Quality &amp; Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment – For Bodied Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality Malaysia, ISO/IEC 17021. MSPO Peer Reviewer Training (MPOCC). HCV-HCS Integrated Concept &amp; Brief Method and Social Knowledge for Assessing High Carbon Stock (Aiknow) and PT Remark Asia, SMETA Audit Training-BSI, Registered Environmental Audit Training (IEMAS). Capacity Development for MSPO MS2530:2022 (Part 1-4) &amp; Scheme Documents Workshop-MPOCC.</p> <p><b>Aspect covered in this audit:</b> Traceability, Continuous Improvement, Occupational, Health &amp; Safety, Environment and Best Practices.</p> <p><b>Language proficiency:</b> He is fluent in English, Bahasa Malaysia.</p>
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**2.2 Impartiality and conflict of interest**

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

**2.3 Accompanying Persons**

No.	Name	Role
	N/A	



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**2.4 Assessment Plan**

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

Date	Time	Subjects	NHA	YKN
Monday, 28/11/2022	-	Travelling from Kuala Lumpur to Segamat	√	√
Tuesday, 29/11/2022 Keratong 11 Estate	08:30 - 09:00	Opening Meeting <ul style="list-style-type: none"> <li>• Presentation by BSI Lead Auditor - introduction of team member and assessment agenda</li> <li>• Confirmation of assessment scope and finalizing audit scope</li> </ul>	√	√
	09:00 - 12:30	Estate assessment: 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.	√	√
	12:30 - 13:30	Lunch break	√	√
	13:30 - 16:30	Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices P7: Development of New Planting	√	√
	16:30 - 17:00	Interim closing meeting	√	√
Wednesday, 30/11/2022 Keratong 11 Estate	09:00 - 12:30	Estate assessment: 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.	√	√
	10:00 - 12:00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-
	12:30 - 13:30	Lunch break	√	√
	13:30 - 16:30	Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting	√	√
	16:30 - 17:00	Interim closing meeting	√	√

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Date	Time	Subjects	NHA	YKN
Thursday, 01/12/2022 Keratong 3 POM	09:00 - 12:30	Mill Assessment: Plant visit, FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√
	12:30 - 13:30	Lunch break	√	√
	13:30 - 16:30	Document review (MS 2530:2013 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.	√	√
	16:30 - 17:00	Interim closing meeting	√	√
Friday, 02/12/2022 Keratong 3 POM	09:00 - 12:00	Continue: Document review (MS 2530:2013 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,	√	√
	12:00 - 13:00	Assessment team discussion and preparation and 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 assessment there were one (1) Major & one (1) Minor nonconformities and two OFI (2) raised. The FGVPSB Keratong 3 POM and FGVPK Keratong 11 Estate certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Non-conformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-Conformity Report			
<b>NCR Ref #:</b>	2282733-202211-M1	<b>Issue Date:</b>	02/12/2022
<b>Due Date:</b>	01/03/2022	<b>Date of Closure:</b>	29/12/2022
<b>Area/Process:</b>	FGVPM Keratong Estate	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 3: 4.4.5.11 Major
<b>Requirements:</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.		
<b>Statement of Nonconformity:</b>	Line site inspection was not effectively monitored.		
<b>Objective Evidence:</b>	During site visit at line site, it was found the blockage of the perimeter drain with sand from erosion and grassy with weed. As per latest Line site inspection (Senarai Semak Aktiviti Naziran Penginapan Ladang Mingguan) dated 31/10/2022, no issue on the perimeter drain. The result shows not reflective from the current condition. As per regulation Employees Minimum Standards Of Housing, Accommodation and Amenities Act 1990 (February 2021) 23. (1) It shall be the duty of the employer of a place of employment where employees and their dependents are provided with housing accommodation to ensure that - (b) the perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water.		

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<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Letter of instruction to the officer in charge of monitoring cleanliness dormitory issued dated 09/12/2022.</li> <li>2. Give training to dormitory inspectors.</li> </ol>
<b>Root cause analysis:</b>	<ol style="list-style-type: none"> <li>1. HEP Clerks do not receive training on new guidelines 'Garis panduan Kemudahan Asas Pekerja Unit Operasi 2021'.</li> <li>2. Housing checklist does not include the back of the hostel and the overall drainage.</li> </ol>
<b>Corrective Actions:</b>	In the monitoring form (Senarai Semak Aktiviti Naziran Penginapan Ladang Mingguan) add item for inspection drains around the hostel.
<b>Assessment Conclusion:</b>	<p>Major NC Close out</p> <ol style="list-style-type: none"> <li>1. Refer Senarai Semak Aktiviti Naziran Penginapan Ladang (Mingguan) dated December 2022 Item no 2 "Saliran perparitan di persekitaran berada dalam keadaan berfungsi".</li> <li>2. Repairing of perimeter drain has been conducted as per photo evidence dated 01/12/2022.</li> <li>3. Person in charge to monitor the perimeter drain condition has been appointed to Mr Hairul Bin Khamisan as per letter evidence dated 09/12/2022.</li> <li>4. Training on monitoring of line site inspection has been conducted on 08/12/2022. Refer Training material and photo evidence.</li> </ol> <p>The evidence found satisfactory implemented; thus, Major NC was effectively closed on 29/12/2022.</p>

<b>Non-Conformity Report</b>			
<b>NCR Ref #:</b>	2282733-202211-N1	<b>Issue Date:</b>	02/12/2022
<b>Due Date:</b>	Next Surveillance	<b>Date of Closure:</b>	Open
<b>Area/Process:</b>	FGVPISB Keratong 3 POM	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 4: 4.3.1.1 Minor
<b>Requirements:</b>	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.		
<b>Statement of Nonconformity:</b>	The operation of Fume Hood and Two Units of Genset found non-compliance to applicable subsidiary legal requirements under Environmental Quality Act 1974.		
<b>Objective Evidence:</b>	<ol style="list-style-type: none"> <li>1. One units of Fume Hood in Laboratory found not having Written Approval or Notified to DOE under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 as required.</li> <li>2. Two units of genset with capacity of 150 kVA and 250 kVA using diesel fuel which having License (Form F) No. 2022/02132, however both fuel burning equipment found not yet notified to DOE under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 as required.</li> </ol>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Apply for Written Notification on Installation of Exhaust/Vent Under Regulation 5 of the Environmental Quality (Clean Air) Regulations 2014.</li> <li>2. Save or response on any feedback from the DOE.</li> </ol>		

<b>Root cause analysis:</b>	<ol style="list-style-type: none"> <li>1. The Jabatan Khidmat Teknik HQ and the contractor for Genset and the Fume Hood did not provide any notification letter from DOE / written approval to the mill.</li> <li>2. No PIC that knowing and responsible to review and collect related document during handing over.</li> </ol>
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Ensure the machine and tools that is related in compliance with regulation have written approval included during handing over process.</li> <li>2. Appoint PIC to handle related to regulation that involve tendering or receive item (budgeted) from HQ.</li> </ol>
<b>Assessment Conclusion:</b>	The CAP has been reviewed and accepted. The effectiveness of the implementation will be verified during next assessment.

Opportunity for Improvement			
<b>Ref:</b>	2282733-202211-I1	<b>Clause:</b>	MSPO 2530 Part 4: 4.4.4.2 (b) (h)
<b>Area/Process:</b>	FGVPISB Keratong 3 POM		
<b>Objective Evidence:</b>	<p>Monitoring and implementation can be improved for fencing and guarding mechanism as per HIRARC for Kernel Plant process under operating of polishing drum.</p> <p>Mill currently excluded from Fire Certificate requirements. Existing quantity and provision of portable fire extinguishers can be further allocated for preparedness purpose.</p>		

Opportunity for Improvement			
<b>Ref:</b>	2282733-202211-I2	<b>Clause:</b>	MSPO 2530 Part 4: 4.5.5.1
<b>Area/Process:</b>	FGVPISB Keratong 3 POM		
<b>Objective Evidence:</b>	<p>Mill can further enhance monitoring and identification of water leakage from piping system and water pump to preserve water resources and complying to Water Management Plan established.</p>		

Noteworthy Positive Comments	
1	Positive comments from all stakeholders interviewed
2	All personnel were cooperative during the assessment process

### 3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
<b>NCR Ref #:</b>	2140066-202111-N1	<b>Issue Date:</b>	03/12/2022
<b>Due Date:</b>	02/12/2022	<b>Date of Closure:</b>	02/12/2022
<b>Area/Process:</b>	FGVPISB Keratong 3 POM	<b>Clause &amp; Category: (Major / Minor)</b>	MSPO 2530 Part 4: 4.5.3.2 Minor

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<b>Clause:</b>	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products
<b>Requirements:</b>	The implementation of waste material storage is ineffectively demonstrated.
<b>Statement of Nonconformity:</b>	The implementation of waste material storage is ineffectively demonstrated.
<b>Objective Evidence:</b>	Keratong 3 POM - During the site visit to the mill compound/ processing plant it was observed that presence of residual materials, scrap materials and maintenance parts were evident without proper storage and segregation.
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Appoint contractor to transfer the shredded fiber from scrap materials storage area and shell bay area</li> <li>2. Perform cleaning work to segregate all the residual materials, scrap materials and maintenance part to the designated area</li> <li>3. Build or make proper signage</li> </ol>
<b>Root cause analysis:</b>	<ol style="list-style-type: none"> <li>1. Not enough space for proper storage and segregation due to the high stock of shredded fiber.</li> <li>2. No signage of designated area for storage material part and scrap materials.</li> </ol>
<b>Corrective Actions:</b>	Contact with by product department HQ to find new buyer or increase the pickup of shredded fiber from existing buyer to reduce the current stock and overproduction.
<b>Assessment Conclusion:</b>	The correction and corrective action are accepted. The effectiveness of the implementation will be verified during next assessment.
<b>Verification Statement:</b>	Proper designated area has been constructed to store the scrap iron with signages and warning tapes. It was verified through site visit. Fibre was collected by contractors and sent to neighbouring estates for field application. Based on document verification and site visit, it was concluded that Minor NC was closed.

<b>Opportunity for Improvement</b>			
<b>Ref:</b>	N/A	<b>Clause:</b>	<b>MSP0 Part __:</b> N/A
<b>Area/Process:</b>	N/A		
<b>Objective Evidence:</b>	N/A		
<b>Verification Statement:</b>	N/A		

**3.4 Summary of the Nonconformities and Status**

<b>CAR Ref.</b>	<b>Clause &amp; Category (Major / Minor)</b>	<b>Issued Date</b>	<b>Status &amp; Date (Closure)</b>
1682567-201804-M1	4.3.1.1 Part 3 Major	21/09/2018	Closed on 20/12/2018
1682567-201804-M2	4.3.1.1 Part 4 Major	21/09/2018	Closed on 20/12/2018

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1682567-201804-N1	4.4.6.3 Part 4 Minor	21/09/2018	Closed on 20/12/2018
1859638-201911-M1	4.4.4.2(d) Part 4 Major	03/12/2019	Closed on 02/02/2020
1859638-201911-N1	4.5.3.5 Part 3 Minor	03/12/2019	Closed on 04/12/2020
1993322-202011-M1	4.6.1.1 Part 3 Major	04/12/2020	Closed on 26/02/2021
1993322-202011-M2	4.3.1.1 Part 4 Major	04/12/2020	Closed on 26/02/2021
1993322-202011-N1	4.4.1.1 Part 3 Minor	04/12/2020	Closed on 03/12/2021
1993322-202011-N2	4.5.3.2 Part 4 Minor	04/12/2020	Closed on 03/12/2021
2140066-202111-N1	4.5.3.2 Part 4 Minor	03/12/2021	Closed on 02/12/2022
2282733-202211-M1	4.4.5.11 Part 3 Major	02/12/2022	Closed on 29/12/2022
2282733-202211-N1	4.3.1.1 Part 4 Minor	02/12/2022	Open

**3.5 Issues Raised by Stakeholders**

IS #	Description
1	<p><b>Issues:</b> <u>Contractors, (Representative from Perniagaan Maju Bera Sdn Bhd &amp; Wazer Jaya Enterprise, S.M Perusahaan Jaya Sdn Bhd)</u></p> <p>2 contractors have been contacted and interviewed which are Perniagaan Maju Bera Sdn Bhd &amp; Wazer Jaya Enterprise (FFB transporter), S.M Perusahaan Jaya Sdn Bhd (hardware supplier). Based on interview, the contractor agreed good relationship has been established between management and contractors. The contractor also mentioned that the payment paid within 30 days as per terms and conditions. Contractor was being briefed regarding RSPO &amp; MSP0 during stakeholders meeting. All workers recruited is local workers and SOCSO and EPF contribution made by the contractors itself.</p> <p><b>Management Responses:</b></p> <p>The estate management noted with the comment and will try to improve communication and relationship with all contractors. Payment for contractor will be made by Muadzam Region Office and all documents for payment prepared by the estate.</p> <p><b>Audit Team Findings:</b></p> <p>No further verification required.</p>
2	<p><b>Issues:</b> <u>FFB supplier (Mohd Ridzuan Ismail, Manager for FELDA Keratong 05)</u></p> <p>As per interview with the manager for FELDA Keratong 05, he mentioned there is 2 types of FFB supplier from FELDA which is under the management of FELDA, managed by the FELDA but sent under FELDA Keratong 05. Payment for FFB will be done by FGVPI Keratong 03 POM on weekly basis through FELDA and payment will be made by FELDA to settler. He also mentioned that explanation of for FFB pricing has been by the management during Communication of the FFB pricing has been done during Jawatankuasa permuafakatan, produktiviti dan kualiti (JPPK).</p> <p><b>Management Responses:</b></p> <p>The management noted with the comment and committed to maintain good relationship with neighbouring estate and to maintain good condition of boundaries.</p> <p><b>Audit Team Findings:</b></p> <p>No further issue.</p>

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<p><b>3</b></p>	<p><b>Issues:</b> <u>Headmaster of Sekolah (LKTP) Keratong 03</u>                  Sekolah (LKTP) Keratong 03 located around 3km from FGVPI Keratong 03 POM and some kids from FGVPI Keratong 03 POM and travel by van to school. He also mentioned good relationship has been maintained between both parties and he also mentioned that he aware about consultation and communication procedure and know who need to be contacted for any communication/consultation. He also hopes that there will be activities together with FGVPI Keratong 03 POM and school.</p> <p><b>Management Responses:</b>                  The management noted with the comment and committed to maintain good relationship with the school and will try to identify any potential contribution to school. Any activities will be planned in early year 2023.</p> <p><b>Audit Team Findings:</b>                  No other issue.</p>
<p><b>4</b></p>	<p><b>Issues:</b> <u>FGVPI Keratong 03 POM workers representative</u>                  Mr Mohammad Rohaizad has been appointed as president for workers union in FGVPI Keratong 03 POM. He mentioned he has been elected through election that has been conducted without interference of the management. He said all workers and staff can join the workers union except executive. For now, there is no request from the workers union and routine meeting will be conducted at least once a year. Responded to question on promotion, he said that all promotion is based on the recommendation by the section lead, appraisal approval by the management. If there is grievance/appeal on the promotion, it can be communicated with representative from workers union and the issues will be forwarded to the management.</p> <p><b>Management Responses:</b>                  The management noted with the comment.</p> <p><b>Audit Team Findings:</b>                  No other issue.</p>

**3.6 List of Stakeholders Contacted**

<p><b>Government Officer:</b>                  SK LKTP Keratong 03</p>	<p><b>Community/neighbouring village:</b>                  Manager FELDA Keratong 05</p>
<p><b>Suppliers/Contractors/Vendors:</b>                  Perniagaan Maju Bera Sdn Bhd                  Wazer Jaya Enterprise                  S.M. Perusahaan Jaya Sdn Bhd</p>	<p><b>Worker’s Representative/Gender Committee:</b>                  Worker’s representative</p>



**Section 4: Assessment Conclusion and Recommendation**

<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>	
Based on the findings during the assessment FGVPISB Keratong 3 POM and FGVPK Keratong 11 Estate Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of FGVPISB Keratong 3 POM and FGVPK Keratong 11 Estate Certification Unit is continued.	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<b>Name:</b> NOROLSAIFUL HAZRI BIN HAMID	<b>Name:</b> NOR HALIS ABU ZAR
<b>Company name:</b> FGV HOLDINGS BERHAD	<b>Company name:</b> BSI SERVICES MALAYSIA SDN BHD
<b>Title:</b> Sustainability Manager	<b>Title:</b> CLIENT MANAGER
<b>Signature:</b> 	<b>Signature:</b> 
<b>Date:</b> 06 JAN. 2023	<b>Date:</b> 29/12/2022

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

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

Criterion / Indicator		Assessment Findings	Compliance
<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> -	<p>FGV Holdings Berhad has established Group Sustainability Policy, approved by the Board of Directors dated 17/11/2020. Refer policy no. FGV/SED/POL/001, rev. 4.0.</p> <p>The policy covers all sustainability aspects as stated under section 5. Policy as follows:</p> <ul style="list-style-type: none"> <li>5. Promoting economic growth               <ul style="list-style-type: none"> <li>5.1. Enhancing livelihood</li> <li>5.2. Profitability and efficient use of resource</li> <li>5.3. Obligation of value chain partners</li> </ul> </li> <li>6. Respecting human rights               <ul style="list-style-type: none"> <li>6.1. Equality and non-discrimination</li> <li>6.2. Upholding labour standard</li> <li>6.3. Respecting rights of indigenous peoples and local communities</li> <li>6.4. Health and safety</li> <li>6.5. Preventing harassment and abuse</li> </ul> </li> <li>7. Protecting the environment               <ul style="list-style-type: none"> <li>7.1. Efficient use of natural resource</li> </ul> </li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		7.2. Managing environmental impacts 7.3. No deforestation and planting on peat 7.4. Protect high biodiversity value (HBV) and High Conservation Value (HCV) areas 7.5. Limitations on the use of hazardous chemicals and agrochemicals 7.6. No open burning/use of fire 7.7. Water management 7.8. Waste management 7.9. Addressing climate change 8. Monitoring and implementation' 8.1. Transparency and reporting 8.2. Grievances management 8.3. Traceability and supply chain	
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. <b>- Major compliance -</b>	Sighted under Group Sustainability Policy stated FGV Group is committed to continuously improve its products and services by adopting the best possible approaches to enhance productivity and profitability by optimising resources and operational efficiencies, while minimising negative impacts on people, social and environmental.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.	FGV Holdings Berhad has established SOP for Internal Audit and documented in Internal Audit Procedure, document no. FGV/GSD-SCCD/SOP/04 Version: 0.0, dated 03/09/2020.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	As stated in the SOP established, the internal audit was scheduled at minimum of once a year. <u>FGVPM Keratong 11 Estate</u> Latest internal audit was conducted on 05/06/2022 by 2 internal auditors from Sustainability Compliance and Certification Department. The audit has been conducted remotely. 6 NCR's has been raised during the internal audit. Sighted Root Cause, Corrective Action and Correction plan has been recorded in the "Pelan Tindakan Untuk Ketidakpatuhan Integrasi Audit Dalaman 2022".	
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Internal Audit Procedure (Doc. No.: FGV/ML-1A/L2-Pr11, Rev. 0 dated 01/06/2016) was developed to ensure the internal audit is carried out for the implementation of RSPO, ISCC and MSPO. The internal audit will be carried out on yearly basis. Internal audit was planned as per the procedure. <u>FGVPM Keratong 11 Estate</u> Latest internal audit was conducted on 05/06/2022 by 2 internal auditors from Sustainability Compliance and Certification Department. The audit has been conducted remotely. 6 NCR's has been raised during the internal audit. Sighted Root Cause, Corrective Action and Correction plan has been recorded in the "Pelan Tindakan Untuk Ketidakpatuhan Integrasi Audit Dalaman 2022".	Complied
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	The internal audit report was documented and made available for management review. As evidence, all findings from internal audit were responded by Mill Management within the timeframe stipulated in the Audit Procedure.	Complied

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Criterion / Indicator		Assessment Findings	Compliance												
<b>Criterion 4.1.3 – Management Review</b>															
<b>4.1.3.1</b>	<p>The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.</p> <p><b>- Major compliance -</b></p>	<p>Sighted SOP of Management Review Meeting. Refer SOP: FGV/GSD-SCCD/SOP/06 Ver 0.0 dated 03/09/2020. Management review was conducted at minimum of once a year. Latest management review was conducted in 11/10/2022. Agenda of the meeting as below:</p> <ol style="list-style-type: none"> <li>1. Introduction</li> <li>2. Audit Result</li> <li>3. Customer Feedback</li> <li>4. Production</li> <li>5. Environment</li> <li>6. Social</li> <li>7. Replanting</li> <li>8. Management Review</li> <li>9. Continuous Improvement.</li> </ol>	Complied												
<b>Criterion 4.1.4 – Continual Improvement</b>															
<b>4.1.4.1</b>	<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>Continual Improvement Plan based on environmental and social impact considered as sampled. Plan segregated into short, mid and long terms. Among others as sighted:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tbody> <tr> <td style="width: 5%;">1</td> <td style="width: 25%;">Environmental</td> <td>New fertilizer storage RM 120K - 2023</td> </tr> <tr> <td>2</td> <td>Operation</td> <td>New garage 6 bay for tractor parking RM 27K - 2023</td> </tr> <tr> <td>3</td> <td>Operation</td> <td>Loading Ramp RM160K -2023</td> </tr> <tr> <td>4</td> <td>Operation</td> <td>1 new lorry 5 mt RM195K - 2023</td> </tr> </tbody> </table>	1	Environmental	New fertilizer storage RM 120K - 2023	2	Operation	New garage 6 bay for tractor parking RM 27K - 2023	3	Operation	Loading Ramp RM160K -2023	4	Operation	1 new lorry 5 mt RM195K - 2023	Complied
1	Environmental	New fertilizer storage RM 120K - 2023													
2	Operation	New garage 6 bay for tractor parking RM 27K - 2023													
3	Operation	Loading Ramp RM160K -2023													
4	Operation	1 new lorry 5 mt RM195K - 2023													

Criterion / Indicator		Assessment Findings			Compliance
		5	Safety	Memastikan kemalangan sifar di dalam ladang tahun 2022	
		6	Operation	Beneficial Plant enhancement - SOP ratio	
		7	Social	Yasin Reading Ceremony to instil spiritual values among the community.	
		8	Operation	Target YPH 14.39mt/ha	
		9	Operation	Target cost /FFB mt RM200	
		10	Environmental	Zero open burning / chemical reduction	
<b>4.1.4.2</b>	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. <b>- Major compliance -</b>	The current practices continued and guide by Standard Operation Procedure (SOP). 5'S to improve housekeeping and layout implemented so far. The estate management will implement and monitor any new technologies being implemented and the training of other personnel such as mechanisation programme.			Complied
<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>	As no new technology is in place thus far. Currently, FGVPM Keratong 11 Estate has carried out the training based on the estate's current practices. 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 5'S activity and briefing found implemented in the estate as observed.			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	Adequate information covering on environmental, social and legal issues which are relevant to stakeholders is shared for effective participation and decision making. Handbook of RSPO Certification for FELDA and FGV were distributed to all the stakeholders.			Complied

Criterion / Indicator		Assessment Findings	Compliance
	disclosure that could result in negative environmental or social outcomes. <b>- Major compliance -</b>	Explanation of RSPO, MSPO, ISCC and all the policies were clearly stated in the handbook. Besides, process of complaints and grievances were included in the handbook and also published at the main office notice board.	
<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>	FGVPM Keratong 11 Estate holds copies of each of the management documents that are required to be publicly available. Last communication was on 24/08/2022 to all stakeholder regarding to document that publicly available. Refer MEMO "Penyediaan Rujukan Dokumen umum Di Pejabat FGVAS and FGVPM" document reference (01) MEMO-RSPO/MSPO2021. Besides, all the information such as annual report, sustainability news and policies were found available in the company's website: <a href="http://www.fgvholdings.com">www.fgvholdings.com</a>	Complied
<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>	FGV Holdings Berhad has developed SOP on "Komunikasi, Penglibatan dan Rundingan" procedure (Doc Number: FGV/ML-IA/L2-Pr12) where the procedure has stated the information that provided to the stakeholders such as policies, social impact assessment and environment aspects. FGVPM Keratong 11 Estate has conducted stakeholder meeting on 24/08/2022. Refer "Program Perundangan Dengan Pihak Bekpentingan Bagi Pengurusan Sawit Lestari Kumpulan Felda/FGV Kompleks Keratong". Sighted involvement of Government Agencies, Contractors, Villagers and Neighbouring estates. During the meeting, the management has explained the requirements of sustainable palm oil certification to all the	Complied

Criterion / Indicator		Assessment Findings	Compliance
		stakeholders. Mostly topic covered were Transparency, Safety and Environment topic.	
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. <b>- Minor compliance -</b>	Management has appointed person in charge on communication and social matters. Refer Appointment letter as below: FGVPM Keratong 11 Estate: M M Kamla Yasin Abdul Rashid dated 11/01/2022	Complied
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. <b>- Major compliance -</b>	Stakeholder lists were last updated on 05/10/2022 for both estate where internal and external stakeholders have been included. Consultation and communication record as stated in the 4.2.2.1. There is no complaint and grievances recorded by the stakeholders.	Complied
<b>Criterion 4.2.3 – Traceability</b>			
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). <b>- Major compliance -</b>	SOP on traceability titled Standard Operating Procedure for Traceability in estate has been established with ref no SOP: FGVPM/TRACEABILITY/LDG/01 effective date 01/09/2019. The procedure clearly explains the traceability requirements and practices and clear roles and responsibilities.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	The estate monitors the despatch to the mill on daily basis to tally and tracking the volume harvesting and tonnage despatch to the mill. Factors on the FFB balances in the fields are accounted for in the process.	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. <b>- Minor compliance -</b>	FGVPM Keratong 11 Estate has appointed Mr Kamal Yassin b. Abdul Rashid (Asst Manager) responsible for Traceability of Product/FFB as Appointment Letter dated 11/01/2022 approved by Estate Manager.	Complied



Criterion / Indicator	Assessment Findings	Compliance
<p><b>4.2.3.4</b> Records of sales, delivery or transportation of FFB shall be maintained.</p> <p><b>- Major compliance -</b></p>	<p>Record of sales and delivery of FFB was maintained and kept as sampled FFB weighbridge ticket/despatch note is produced for all transaction to FGVPIB Keratong 3 POM. The set of documents among others consists of the following information:</p> <p>Weighbridge ticket –  Date: 28/11/2022  D/O no: 0008150  Lorry No.: VEN8956 (Driver-Hairolnizam)  MPOB License No: 558962002000  Quantity Nett Weight: 3.74 MT</p> <p>Weighbridge ticket –  Date: 26/11/2022  D/O no: 0008142  Lorry No.: NDP9833 (Driver-Azhar)  MPOB License No: 558962002000  Quantity Nett Weight: 6.37 MT</p> <p>The Monthly Report of FFB Received from FGVPM Keratong Estate for month of September 2022 was sampled with details shown below:</p> <ul style="list-style-type: none"> <li>• Block No</li> <li>• Nett weight</li> <li>• Deduction</li> <li>• Price Per MT</li> <li>• Total Amount</li> </ul>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance	
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
<b>4.3.1.1</b>	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. <b>- Major compliance -</b>	The legal compliance lists of permits & licenses are available and being monitored and updated periodically by person in- charge of Legal Requirements. Details as below: - FGVPM Keratong 11 Estate 1. MPOB License #58962002000 valid from 01/03/2022 to 28/02/2023 2. Diesel permit #PHG/RPN/045/98 SK(D) for 10,920 liters valid from 27/07/2021 to 26/07/2024 3. LEVI permit #KE. WB (07)009/20/0124 dated 26/01/2022 4. Weighbridge Inspection by Metrology Corporation Malaysia Sdn Bhd #JMU-ATN-146117 inspected 22/04/2022 5. Wages Deduction Permit # (22)dIm BHG.PU/9/129 Jld 23.	Complied
<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 applicable laws identified were listed in Register of Legal and Other Requirements, [FGV/GSD-SR/LR001]. The sample of Act and Legal at FGVPM Keratong 11 Estate reviewed on 01/11/2022 as listed herein: 1. OSHA 1994 2. Pesticides Act 1974 and Regulations, 3. Environmental Quality Act and Regulations 1974 4. Factories and Machinery Act and Regulations, 1967 5. Weights and Measures Regulations 1981	Complied

Criterion / Indicator		Assessment Findings	Compliance
		6. Electricity Regulations 1994 7. Immigration Act 1959 8. Employee Provident Fund 1991 9. Minimum Wages Order 2022 10. Peraturan – Peraturan Perkhidmatan BOMBA (Amendment) 2022	
<b>4.3.1.3</b>	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. <b>- Major compliance -</b>	FGV Holdings Berhad have centralised system for tracking any changes in the law as per “Panduan: Sistem Pengesanan Perubahan Undang-undang” dated 23/06/2015, Version:04. Any changes in the relevant regulations are through Plantation and Sustainability Department and the Manager, who are sole responsible.	Complied
<b>4.3.1.4</b>	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. <b>- Minor compliance -</b>	The person in -charge for FGVPM Keratong 11 Estate, Mr M Kamal Yasin Abdul Rashid as the person in charge of Legal Requirement vide letter dated 11/01/2022 approved by Manager.	Complied
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. <b>- Major compliance -</b>	The oil palm cultivation activities for the sampled estates do not diminish the land use rights of other users. The conditions stipulated in the land title was adhered to.	Complied
<b>4.3.2.2</b>	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. <b>- Major compliance -</b>	FGVPM Keratong 11 Estate was leased to FGV for Oil Palm Plantation activities from FELDA. Tenancy Agreement dated 06/01/2012 and 21/01/2012. which commenced on 01/01/2012 between FELDA and FGV and the agreement will further renew every 3 years up to total 99 years was sighted for FGVPM Keratong 11 Estate. Seen the land titles as below:	Complied

Criterion / Indicator		Assessment Findings	Compliance
		1. Land title# 3648, Lot No.: PT 8141, 567.70 ha 2. Land title# 3649, Lot No.: PT 8142, 628.70 ha	
<b>4.3.2.3</b>	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. <b>- Major compliance -</b>	The estate identified boundaries through means of markers and trenches. This confirmed that they have maintained boundary at the visited following points. 1. PR 22F/Block 5 boundary with Ladang DSK 2. PM 00A/Block 3 boundary with Hutan Simpan Lesung 3. PR 21E/Block 6 boundary with Smallholders	Complied
<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 was no land dispute at all the sampled estates. The company has the legal ownership documents as demonstrated by possessing a land title.	Complied
<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 land encumbered by customary rights under FGV Keratong certification unit.	N/A
<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 land encumbered by customary rights under FGV Keratong certification unit.	N/A
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.	There is no land encumbered by customary rights under FGV Keratong certification unit.	N/A

Criterion / Indicator		Assessment Findings	Compliance
- Major 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>	<p>Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.</p> <p>- Minor compliance -</p>	<p>SIA was conducted on 08/03/2021 by Sustainability Compliance and Certification Department, Group Sustainability Division, FGV Holdings Bhd for FGVPISB Keratong 3 POM and FGVPK Keratong 11 Estate. Internal and external stakeholders were involved during the assessment.</p> <p>SIA Management Plan has been established dated 29/11/2021. Topics covered were:</p> <ol style="list-style-type: none"> <li>1. Issue</li> <li>2. Outcome</li> <li>3. Person In charge</li> <li>4. Timeframe</li> <li>5. Evidence of action taken and status.</li> </ol>	Complied
<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>- Major compliance -</p>	<p>FGV Holdings Berhad has developed procedure of dealing with complaint and grievances. Refer SOP: FGV/ML-1A/L2-Pr13 Issue No. 2 Rev. 02 dated 01/04/2019. The objectives of the procedure are to provide a channel for the internal stakeholders and external stakeholders to lodge any complains to the management. Mechanism to handle complaints was clearly described in the procedure. The</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		time frame for investigation of the issue should be done within 14 working days. Refer Section 9 Carta Alir Proses Aduan.	
<b>4.4.2.2</b>	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. <b>- Major compliance -</b>	The estates are using Complaint Form for external stakeholder and Complaint Book to record complaints and requests reported by the internal workers. There was no complaint received from external stakeholders for FGVPK Keratong 11 Estate.	Complied
<b>4.4.2.3</b>	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. <b>- Minor compliance -</b>	The estates are using Complaint Form for external stakeholder and Complaint Book to record complaints and requests reported by the internal workers. Sample of complaint record were: 1. 18/10/2021 from M.Hazmi, Issue: Water source interruption, Issue has been solved the issue on 10/10/2021 2. 15/01/2022 from Hamdani, Issue: No clean water for drinking. Issue has been solved the issue on 25/01/2022.	Complied
<b>4.4.2.4</b>	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. <b>- Minor compliance -</b>	Awareness training has been conducted on 24/08/2022 at FGVPK Keratong 11 Estate. Refer training material "Penerangan Komunikasi (Aduan & Rungutan), Ikrar Anti Rasuah, Has Asasi Manusia, Kebebasan Bersuara Dan Menganggotai Kesatuan". Training has been given by Mr Mohd Firdaus and attended by 14 participants. Interview with the internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure, and they were briefed by the management during stakeholder meeting.	Complied
<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 estates are using a form "Borang Permohonan Pembaikan Asrama and Borang Kerosakan & Pembaikan Rumah Kakitangan/Pejabat/ Asrama/ Stor". The past 24 months records of complaint were still available for verification.	Complied

Criterion / Indicator		Assessment Findings	Compliance
<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>	Sighted CSR record for 2021: FGVPM Keratong 11 Estate 1. Donation of chicken during Hari Raya festival	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>	Sighted Group Occupational Safety & Health Management Policy established, documented and implemented as follows: 'Pernyataan Polisi Kesehatan Dan Keselamatan Keselamatan signed by CEO (Mohd Nazrul Izam Mansor) dated 05/11/21". Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors. The Policy is implemented among others through the OSH activities stated in OSH Programmes 2022.	Complied
<b>4.4.4.2</b>	The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied	a) Briefings to employees are made through weekly briefing and ad-hoc basis through the field staff/Executives. b) Masterlist of HIRARC identified for 26 activities in FGVPM Keratong 11 Estate last reviewed and updated 15/01/2021 that included Harvesting, Pruning, Transportation, Manuring, Loose Fruits Collection, Store Operation, Replanting, Chemical Storage, Spraying and etc. CHRA was conducted by Dr. Yasriza Yahaya (JKKP HIE 127/171/2(8) on 13/02/2018 from Occumed Consultancy & Services Sdn Bhd. Medical Surveillance Programme conducted by Dr. Ling Kay Kwong (HQ/08/DOC/00/545) from Klinik Segamat for 7 Sprayers, Supervisor and Storekeeper. Recommended	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>Annual Medical Surveillance. NRA was conducted by Mohd Syukri b. Jamluddin (HQ/14/PEB/00/136) on 02/08/2021 from Handstech Solution Services Sdn. Bhd. Mapping conducted for Tractor, Mini Tractor, Mist Blower and Grass Cutter machine. Annual Baseline Audiometric was conducted on 01/04/2022 on 7 workers by Klinik Syed Badaruddin where results show 7 workers with Abnormal Audiogram where 5 is new case of hearing impairment recorded but none required retest.</p> <p>c) Spraying and PPE Training was conducted on 17/02/22 at PM10C Block 13 and attended by 9 Sprayers. Others sample of training detail up in the 4.4.6.1.</p> <p>d) Available and documented PPE Matrix (FGVPM) approved by Estate Manager. As stated a guidance of PPE used such as: Harvester: Helmet, cotton gloves (carrier), Rubber boots. Sprayer: Safety helmet, Goggles, Earmuff (mist blower), respirator c/w cartridge, nitrile gloves, rubber boots and apron. Manurer: Safety helmet, Particle Mask, Nitrile gloves, rubber boots, (Apron not included).</p> <p>e) SOP Chemical Handling established such as Chemical Mixing (FGVPM/L3/GPK-007), Management of Chemicals and Pesticides &amp; Fertilizer (FGVPM/L3/GPK-006) Rev.00 Effective Date 01/02/2020. Another Guideline for Spraying (FGVPM/L3/GPK-010) Rev.00 Effective Date 01/02/2020. which explain process of handling chemical and spraying activity.</p> <p>f) PIC for Safety and Health as sighted Appointment Letter of Kadarusman Tumin (Estate Manager) as SHC Chairman by Mohd Nasir Majid (Regional Controller) dated 10/01/2022. M.M Kamal Yassin Abd Rashid (Asst Manager) was appointed as Secretary of</p>	



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		<p>SHC by Estate Manager as Appointment Letter dated 11/01/2021. All roles and responsibility as secretary and PIC of OSH clearly defined.</p> <p>g) Meeting of Safety and Health Committee was regularly conducted as minutes of meeting dated 10/11/2022, 24/08/2022, 19/05/2022, 22/02/2022. OSH issues discussed in the meetings as sighted, and information recorded.</p> <p>h) SOP Emergency SOP (FGV/FGVPM/II/IMS/15/013 Ver.02 dated 01/11/21 to explain process of determining emergency, emergency preparedness and response for handling scenarios such as fire, chemical spillage, earthquake, flood, terrorist threat, pandemic and etc.</p> <p>i) First Aid SOP (FGVPM/L3/GPK-003) Rev.00 Effective Date 01/02/2020 established and documented consist of requirement to maintain First Aid Box at estate and operation area. A revision was made for the requirements on content of first aid box and checklist which now having 13 items.</p> <p>j) JKPP 8 was submitted to DOSH on 13/01/2022 where 2 accident cases involving Bangladeshi Manurer Mahmudul Islam, legs dislocated (MC 41 days) and Malaysian worker Tractor Driver Mohd Hishamuddin, finger injury (MC 6 days). Accident statistics found recorded and discussed in a quarterly meeting of SHC as verified.</p>	
<b>Criterion 4.4.5: Employment conditions</b>			
<b>4.4.5.1</b>	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The	FGV Holdings Berhad has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision:	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>policy shall be signed by the top management and effectively communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>4.0 dated 17/11/2020 section 5.0 (B). Respecting Human Right. FGV is committed and support human rights. Communication to the employees was done in various methods such as briefing during morning muster, display on notice boards at workers' hostel and training. Interview with workers showed that they have a good understanding on human rights. Latest awareness on the policies has been conducted on 24/08/2022.</p>	
<b>4.4.5.2</b>	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p><b>- Major compliance -</b></p>	<p>FGV Holdings Berhad has established Equal Opportunity Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.2.1 Equality and Non-Discrimination. The company is committed to ensure all the employees are treated equally regardless of race, nationality religion, gender, age and other political opinions. Interview with the workers showed that no discrimination is being practiced. Latest awareness on the policies has been conducted on 24/08/2022.</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>FGVPM Keratong 11 Estate has an employment contract for its foreign workers. Pay and conditions are documented and are above the Minimum Wage Order 2022. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker.</p> <p>Sampled of the agreement and pay slips for the months of Mar 2022, June 2022 and September 2022 as below:</p> <p>FGVPM Keratong 11 Estate</p> <ol style="list-style-type: none"> <li>1. Employee ID: FW04830614</li> <li>2. Employee ID: FW04830592</li> <li>3. Employee ID: FW04830069</li> </ol>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		4. Employee ID: FW04830418 5. Employee ID: FW04830505 6. Employee ID: FW04830522 7. Employee ID: FW04830450 8. Employee ID: LW04830035	
<b>4.4.5.4</b>	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.  <b>- Minor compliance -</b>	Sighted availability of contractors at estate. Contractors were submitting the copy of workers agreements to the office. Payslip were verified for the month of June 2022 and September 2022. Sample of employees of contractors as below: Perniagaan Maju Bera, contract number: 5300006608 dated 01/10/2022. 1. Employee NRIC = 820712-XX-XXXX 2. Employee NRIC = 820908-XX-XXXX Wazer Jaya Enterprise, contract number: 5300006806 dated 01/07/2022 1. Employee NRIC = 860102-XX-XXXX	Complied
<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>	All the recruited workers will be registered in the Online Plantation Management System (OPMS) where personal details such as name, nationality, date of employed, job description, wage rate, date of birth, gender and years of service was stated in the system.	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	Employment Contracts were issued and acceptance of copied of employment contract were acknowledged by the workers. The terms and conditions were clearly stated in the employment contract such	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>as annual leave entitlement, benefits and medical leave. The sampled employment contracts are as follows:</p> <p>Sampled of the agreement and pay slips for the months of Mar 2022, June 2022 and September 2022 as below:</p> <p>FGVPM Keratong 11 Estate</p> <ol style="list-style-type: none"> <li>1. Employee ID: FW04830614</li> <li>2. Employee ID: FW04830592</li> <li>3. Employee ID: FW04830069</li> <li>4. Employee ID: FW04830418</li> <li>5. Employee ID: FW04830505</li> <li>6. Employee ID: FW04830522</li> <li>7. Employee ID: FW04830450</li> <li>8. Employee ID: LW04830035</li> </ol>	
<b>4.4.5.7</b>	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p><b>- Major compliance -</b></p>	<p>Both Estate is using Pocket Check roll Book where the attendance of workers is recorded on daily basis. Overtime is recorded in which is acknowledged by the workers and staff. The raw data will be key in in the system as 4.4.5.5.</p>	Complied
<b>4.4.5.8</b>	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p> <p><b>- Major compliance -</b></p>	<p>Records reviewed on the Check roll Book of sampled workers found that the enter time and exit time was clearly stated in the timecard. The sampled workers above have recorded overtime not exceeding 104 hours per month.</p>	Complied
<b>4.4.5.9</b>	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective</p>	<p>Documented pay slip was distributed to individual workers on the day of payment. All of them above have achieved the Minimum Wage</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>agreements.</p> <p><b>- Major compliance -</b></p>	<p>Order 2022. Hours of overtime has recorded in the pay slip as well. Sampled of the agreement and pay slips for the months of Mar 2022, June 2022 and September 2022 as below:</p> <p><u>FGVPM Keratong 11 Estate</u></p> <ol style="list-style-type: none"> <li>1. Employee ID: FW04830614</li> <li>2. Employee ID: FW04830592</li> <li>3. Employee ID: FW04830069</li> <li>4. Employee ID: FW04830418</li> <li>5. Employee ID: FW04830505</li> <li>6. Employee ID: FW04830522</li> <li>7. Employee ID: FW04830450</li> <li>8. Employee ID: LW04830035</li> </ol>	
<b>4.4.5.10</b>	<p>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.</p> <p><b>- Minor compliance -</b></p>	<p>The management has provided facilities such as mosque, recreational facilities such as futsal field, badminton court and volleyball court to the workers and dependents. Government clinic was available in the complex. The workers will be awarded with bonus once a year based on performance. Various incentive and allowance were also given to the workers.</p>	Complied
<b>4.4.5.11</b>	<p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p><b>- Major compliance -</b></p>	<p>The workers in the estates have been provided with basic facilities such as government clinic, football field, mosque, sundry shops and other amenities such as electricity and water supply from government with subsidize. Weekly inspection was recorded in "Borang Pemeriksaan Asrama Pekerja". Last inspection on 31/10/2022.</p> <p>Line site inspection was not effectively monitored. During site visit at line site, it was found the blockage of the perimeter drain with sand</p>	Major Non-Conformities

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		from erosion and grassy with weed. As per latest Line site inspection (Senarai Semak Aktiviti Naziran Penginapan Ladang Mingguan) dated 31/10/2022, no issue on the drain. The result shows not reflective from the current condition. As per regulation Employees Minimum Standards Of Housing, Accommodation and Amenities Act 1990 (February 2021) 23. (1) It shall be the duty of the employer of a place of employment where employees and their dependents are provided with housing accommodation to ensure that— (b) the perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water; Thus, Major NC was raised.	
<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>	FGV Holdings Berhad has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.2.5 Preventing Harassment and Abuse. The company is committed to protect the rights of women on the reproductive and family planning. Gender Committee was developed at FGVPM Keratong 11 Estate to provide a system to channel the complaint regarding sexual harassment and violence. Latest Gender Committee Meeting was conducted on 25/01/2022.	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	FGV Holdings Berhad has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.2.2 Upholding Labour Standard. The company allows the employees to join any legal association and get approval from the management. There is no union form at estate. Verified through Interview found that workers aware on no restriction	Complied

Criterion / Indicator		Assessment Findings	Compliance
	discriminated against or suffer repercussions. <b>- Major compliance -</b>	to form and join union. Latest awareness on the policies has been conducted at FGVM Keratong 11 Estate on 24/08/2022.	
<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. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions. <b>- Major compliance -</b>	FGV Holdings Berhad has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.2.2 Upholding Labour Standard where the company will not recruit any individual who less than 18 years old to work in plantations. Document reviewed on the list of workers confirmed that all the employees were above 18 years old. Latest awareness on the policies has been conducted at FGVM Keratong 11 Estate on 24/08/2022.	Complied
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept. <b>- Major compliance -</b>	Training recorded and maintained as below sampled: <ul style="list-style-type: none"> <li>• Manuring and subsoil training was conducted on 19/01/2022 at Block PM00A (Manual) and PM08b (Subsoil) and attended by 10 manurer &amp; mandores.</li> <li>• First Aid Box training during rollcall conducted on 21/10/2022 by MA and attended by 40 workers.</li> <li>• Harvesting safety training conducted on 14/02/2022 attended by 10 persons trained by assistant.</li> <li>• HCV and sustainability training dated 09/08/2022</li> <li>• Company Policy and procedure training dated 31/03/2022</li> <li>• Spraying training conducted by management dated 17/02/2022</li> <li>• Firefighting and drill training conducted by the management dated 14/10/2022</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>Recycle programme and triple rinsing dated 26/01/2022.</li> </ul>	
<b>4.4.6.2</b>	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. <b>- Major compliance -</b>	Training needs of individual employees had been identified prior to the planning and implementation of the training programmes to provide the specific skill and competency required to all employees based on their job description. The training matrix for 2022 "Training Needs Analysis (TNA) 2021/2022".	Complied
<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>	It was evident that from the training matrix, all trainings had been planned and implemented to ensure that all employees are well trained in their job function and responsibility.	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>	There is a Group Policy titled Statement of Environmental Policy for FGV Holdings Berhad" dated 05/11/2021 signed by the Group CEO (Mohd Nazrul Izam Mansor) mainly in relation to environmental protection. Therein the policy among others contained commitment towards. <ul style="list-style-type: none"> <li>To protecting the environment and conserving biodiversity through sustainable development.</li> <li>Abide by all legislative requirement</li> <li>Manages environmental risk and providing reasonable resources to minimise risk and pollution to environment</li> </ul>	Complied



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		<ul style="list-style-type: none"> <li>Continuing and improving efficiency towards enhancing environment.</li> </ul>	
<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>Environmental Aspect and Impact Assessment (FGV/FGVPM/IV/IMS/15/1.6 Pind 1) for FGVP Keratong 11 Estate was reviewed and dated 03/02/2022. The environmental aspects identified from chemical store, Block (PMOOA, PM08B, PM10C &amp; PM18D), Office and Hostel, Landfill, Replanting field (PR21E &amp; PR22F), Buffer zone and etc. The decision either significant and not significant based on assessment of Frequency X Severity X Number of Cases and Legal factor.</p>	Complied
<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, effectively implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>The aspect and impact analysis for estate operations are documented on Jan 2022 and revised annually. In the comprehensive report, the study of aspect and impact action plan to:</p> <p>a) Plan to avoid negative impact and to promote positive impacts.</p> <p>b) Reduction disposal of waste taking into consideration of social responsibilities.</p> <p>c) Plan to reduce pollution and release of GHG.</p> <p>d) Development and implementations.</p>	Complied
<b>4.5.1.4</b>	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p><b>- Minor compliance -</b></p>	<p>The Pollution Prevention Plan and Waste Management Action Plan 2022” – is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly. Among other actions taken by the CU were:</p> <p>a) Scheduled wastes – disposed to Kualiti Alam Sdn Bhd.</p> <p>b) Domestic wastes are disposed to landfill.</p> <p>c) Full compliance to zero burning practices.</p> <p>d) Installation of ESP Vorsep System commissioned in Dec 2018.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. <b>- Major compliance -</b>	Awareness training program is available in the Training Program updated on a yearly basis or revised as per the management requirement. Included in this programme are subjects related to environment e.g., environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training FY 2022.	Complied
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. <b>- Major compliance -</b>	Environmental meeting was conducted on Meeting of Safety and Health Committee was regularly conducted as minutes of meeting dated 10/11/2022, 24/08/2022, 19/05/2022, 22/02/2022. The agenda discussed among others as follows. <ul style="list-style-type: none"> <li>• Matters arising</li> <li>• Performance of environment compliance</li> <li>• Report on environmental pollution</li> <li>• Self-compliance checklist performance</li> <li>• Effluent treatment /clean air / scheduled waste</li> <li>• Audit report on RSPO/MSPO</li> <li>• Domestic waste issues</li> </ul>	Complied
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>			
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. <b>- Major compliance -</b>	The plan to assess the usage of non-renewable energy including fossil fuel, electricity, and energy efficiency in the operations of FGVPK Keratong 11 Estate over the base period such as monthly record on energy consumption for both renewable and non-renewable sources were maintained and documented. It is monitored to optimize use of renewable energy. The data is compiled for	Complied

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Criterion / Indicator		Assessment Findings	Compliance																																												
		comparison and control for future improvement with aim of gradual reduction particularly diesel.																																													
4.5.2.2	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p><b>- Major compliance -</b></p>	<p>Below are data of Diesel Usage for operation in estate that included diesel fuel used by contractor:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB Produced (MT)</th> <th>Monthly Diesel Usage (Lit)</th> <th>Diesel/FFB</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>2,393</td> <td>366.3</td> <td>6.53</td> </tr> <tr> <td>February</td> <td>1,478</td> <td>330.9</td> <td>4.47</td> </tr> <tr> <td>March</td> <td>2,983</td> <td>424.2</td> <td>7.03</td> </tr> <tr> <td>April</td> <td>2,921</td> <td>370.4</td> <td>7.89</td> </tr> <tr> <td>May</td> <td>2,356</td> <td>385.9</td> <td>6.11</td> </tr> <tr> <td>June</td> <td>2,241</td> <td>338.7</td> <td>6.62</td> </tr> <tr> <td>July</td> <td>2,461</td> <td>359.2</td> <td>6.85</td> </tr> <tr> <td>August</td> <td>2,440</td> <td>394.8</td> <td>6.18</td> </tr> <tr> <td>September</td> <td>2,589</td> <td>466.7</td> <td>5.55</td> </tr> <tr> <td>October</td> <td>2,381</td> <td>574.3</td> <td>4.15</td> </tr> </tbody> </table>	Month	FFB Produced (MT)	Monthly Diesel Usage (Lit)	Diesel/FFB	January	2,393	366.3	6.53	February	1,478	330.9	4.47	March	2,983	424.2	7.03	April	2,921	370.4	7.89	May	2,356	385.9	6.11	June	2,241	338.7	6.62	July	2,461	359.2	6.85	August	2,440	394.8	6.18	September	2,589	466.7	5.55	October	2,381	574.3	4.15	Complied
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4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p><b>- Minor compliance -</b></p>	Sighted a solar panel lighting used in estate at office area and store.	Complied																																												
<b>Criterion 4.5.3: Waste management and disposal</b>																																															
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p><b>- Major compliance -</b></p>	<p>Available waste identification for Year 2022. Divided into 2 categories:</p> <ul style="list-style-type: none"> <li>• Field/Operation: Fertilizer bags, Tyres, Scrap metal and woods.</li> <li>• Office/Housing: <ul style="list-style-type: none"> <li>Paper/plastics/cloths</li> <li>Electrical equipment</li> </ul> </li> </ul>	Complied																																												

Criterion / Indicator		Assessment Findings	Compliance
		Domestic waste (food waste/kitchen waste)	
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <ul style="list-style-type: none"> <li>a) Identifying and monitoring sources of waste and pollution</li> <li>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</li> </ul> <p><b>- Major compliance -</b></p>	<p>Waste Management Plan documented and established covering wastes identified earlier and Action Plan with activities to be conducted from January-December 2022. Responsible PIC clearly stated with status and progress indicated in the action plan. As mentioned, identification and monitoring sources of waste and pollution (Fertilizer bag) considered and improvement on efficiency such as reduction and recycling mentioned and stated clearly.</p>	Complied
4.5.3.3	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p><b>- Major compliance -</b></p>	<p>SOP for Handling Scheduled Waste (FGVPM/L2/PAS-04) Rev. 01, Effective Date 23/01/2020 as reference to handle, storage, labelling and disposal of Scheduled Waste.</p>	Complied
4.5.3.4	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer’s labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p><b>- Major compliance -</b></p>	<p>Available a guideline based on Department of Agriculture ref 91/120/038/014 dated 7/11/2002. A Pictorial guideline on the methods of triple rinsing is also shown in the document. Under the operational control procedure established as given in the guideline and practice for handling empty pesticides. Empty pesticides containers were triple rinsed, holes punched and stored separately in the SW store. Thereafter disposal arrangement will follow accordingly as per procedure in Sustainability Manual procedure ref ML/-1A/L4 2016 and SOP ref HSE/SOP/SW/1. The current practice for both mill (Kualiti Alam Sdn Bhd) and estate (centralized in Selendang Estate) is delivery as SW 410 to the licensed buyer. No containers being used for other purpose in the estates with the exception that some empty</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance				
		chemical containers were recycled for premixing pesticides for onward delivery to field.					
<b>4.5.3.5</b>	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. <b>- Minor compliance -</b>	Domestic waste for the estate was disposed at Landfill at Block 06 PM00A. A collection of domestic waste scheduled at 2 or 3 times a week The sites were sighted and verified. The area is sufficiently distant from habitation and water contamination. No open burning sighted at landfill.	Complied				
<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, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	<p>Assessment of Polluting Activities and Action Plan to Reduce Pollution for FGVP M Keratong 11 Estate conducted and documented. Polluting activities covering:</p> <ul style="list-style-type: none"> <li>• Transportation of FFB from estate to mill</li> <li>• Spraying chemicals/pesticides</li> <li>• Manuring with chemical base fertilizer</li> <li>• Disposal of waste to landfill.</li> </ul> <p>FGVP M Keratong 11 Estate has assessed greenhouse gas emission with seen on document titled Basic Data GHG 2021 (Jan-Dec 2021). Available GHG Reduction and Monitoring Plan year 2022 established for FGVP M Keratong 11 Estate. Among in the plan included:</p> <table border="1"> <tr> <td>Diesel usage</td> <td>Recording, monitoring and reducing diesel consumption for FFB transportation. Training related staff</td> </tr> <tr> <td>Chemical/pesticides usage</td> <td>Recording, monitoring and reducing chemical/pesticides consumption. Training related staff, worker and stakeholders.</td> </tr> </table>	Diesel usage	Recording, monitoring and reducing diesel consumption for FFB transportation. Training related staff	Chemical/pesticides usage	Recording, monitoring and reducing chemical/pesticides consumption. Training related staff, worker and stakeholders.	Complied
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Criterion / Indicator		Assessment Findings		Compliance
		Chemical base fertilizer usage	Increase use of organic fertilizer of composting materials. Reduce use of chemical base fertilizer	
		Domestic waste (organic)	Monitoring domestic waste collection and landfill and no burning.	
		Promoting recycling and reuse of waste	Reduce paper consumption Recording wastepaper collection and recycling Recycling training and awareness	
<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>	Impact of pollutions with action plan to reduce the polluting activities found clearly stated. Among sighted action plan included among others: <ul style="list-style-type: none"> <li>• Regular inspection at PUSPAKOM as schedule for dark smoke emission.</li> <li>• Switch off engine when not moving to reduce diesel consumption.</li> <li>• Banning spraying at buffer zone area to preserve riparian.</li> <li>• Triple rinse activity and reuse empty chemicals containers.</li> <li>• Empty fertilizer bag collected and use back for loose fruits.</li> </ul>		Complied
<b>Criterion 4.5.5: Natural water resources</b>				
<b>4.5.5.1</b>	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: <ul style="list-style-type: none"> <li>a. Assessment of water usage and sources of supply.</li> </ul>	FGVPM Keratong 11 Estate has established and maintained a Water Management Plan year 2022. Also sighted SOP for Water Management in Estate (FGV/FGVPM/SOP/PAS-09) Rev.02 Effective Date 30/08/2021. The SOP also providing ways to manage water in estate operation and optimize water usage.		Complied

Criterion / Indicator	Assessment Findings	Compliance
<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>a. Water sources: trenching and drainage along the field, pond, rain water for operation, Pengurusan Air Pahang (PAIP) for domestic consumption/housing.</p> <p>b. FGVPM Keratong 11 Estate has conducted any monitoring or sampling as no outgoing water to water way at Sg. Kemabai annually. Estate used water supply form PAIP hence does not require an internal water treatment for the domestic consumption.</p> <p>c. Optimization mentioned by proper maintenance, additional culvert, monitoring premixing activity to prevent pollution, maintaining cover crop to avoid soil erosion, rain water harvesting activities promoted and practices.</p> <p>d. Buffer zones were protected. Areas visited for the estates as tabled below: Estate Field no PM00A/PR182 at Sg Kemabai.</p> <p>e. No natural vegetation in riparian areas has been removed, this verified as per site visit.</p> <p>f. No bore well is being use for water supply, verified as per site visit and interview with workers and management.</p>	
<p><b>4.5.5.2</b> No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p><b>- Minor compliance -</b></p>	<p>During the site visit and as feedback from estate management no construction of such was observed. This was further supported through facts obtained from interviews among the employees.</p>	<p>Complied</p>
<p><b>4.5.5.3</b> 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>Rainwater harvesting practiced as sighted mention on Water Management Plan and implemented in hostel.</p>	<p>Complied</p>

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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> <p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</p> <p><b>- Major compliance -</b></p>	<p>HCV and Biodiversity Assessment Report for FGVPM Keratong 11 Estate was conducted by Group Sustainability Division, August 2022. As in justification mentioned no RTE mamals recorded and seen in estate. Wildlife such as monkey, tapir, wild cat originated from Forest Reserve Sg, Merong adjescent to estate and from surrounding area.</p> <table border="1" data-bbox="1048 678 1854 1284"> <thead> <tr> <th>Name of Species</th> <th>Scientific Name</th> <th>IUCN Status</th> </tr> </thead> <tbody> <tr><td>Babi Hutan</td><td>Sus scrofa</td><td>LC</td></tr> <tr><td>Monyet/Kera</td><td>Macaca fascicularis</td><td>EN</td></tr> <tr><td>Beruk</td><td>Macaca nemestrina</td><td>EN</td></tr> <tr><td>Tupai</td><td>Tupaia glis</td><td>LC</td></tr> <tr><td>Tapir</td><td>Tapirus indicus</td><td>EN</td></tr> <tr><td>Kucing batu</td><td>Prionailurus bengalensis</td><td>LC</td></tr> <tr><td>Musang</td><td>Paradoxurus hermaphroditus</td><td>LC</td></tr> <tr><td>Biawak Air</td><td>Veranus salvator</td><td>LC</td></tr> <tr><td>Tedung Selar</td><td>Ophiophagus hannah</td><td>VU</td></tr> <tr><td>Tedung Hitam</td><td>Naja naja</td><td>LC</td></tr> <tr><td>Sawa Batik</td><td>Malayopyhton reticulatus</td><td>LC</td></tr> <tr><td>Pipe Hornbill/Rangkong</td><td>Bysanister fistulator</td><td>LC</td></tr> <tr><td>Burung Hantu</td><td>Tyto alba javanica</td><td>LC</td></tr> <tr><td>Helang Hitam</td><td>Ictinaetus malayensis</td><td>LC</td></tr> <tr><td>Crest Sepent Eagle</td><td>Spilornis cheela</td><td>LC</td></tr> <tr><td>Burung Tiong</td><td>Gracula religiosa</td><td>LC</td></tr> </tbody> </table> <p>Status of assessment:</p> <table border="1" data-bbox="1048 1332 1854 1375"> <tr> <td>Indicator of Present</td> <td>Status</td> </tr> </table>	Name of Species	Scientific Name	IUCN Status	Babi Hutan	Sus scrofa	LC	Monyet/Kera	Macaca fascicularis	EN	Beruk	Macaca nemestrina	EN	Tupai	Tupaia glis	LC	Tapir	Tapirus indicus	EN	Kucing batu	Prionailurus bengalensis	LC	Musang	Paradoxurus hermaphroditus	LC	Biawak Air	Veranus salvator	LC	Tedung Selar	Ophiophagus hannah	VU	Tedung Hitam	Naja naja	LC	Sawa Batik	Malayopyhton reticulatus	LC	Pipe Hornbill/Rangkong	Bysanister fistulator	LC	Burung Hantu	Tyto alba javanica	LC	Helang Hitam	Ictinaetus malayensis	LC	Crest Sepent Eagle	Spilornis cheela	LC	Burung Tiong	Gracula religiosa	LC	Indicator of Present	Status	<p>Complied</p>
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		High population of RTE species	No	
		Important population or existence of RTE and endemic species	No	
		Availability of recognized UNISCO, Ramsar site and equivalent	No	
		Environmental Sensitive area (ESA)	No	
<b>4.5.6.2</b>	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p><b>- Major compliance -</b></p>	<p>Relevant programme to workers pertaining awareness of HCV areas and RTE observed conducted. Interview with employees noted that awareness programme had been conducted. Employees were aware of:</p> <ul style="list-style-type: none"> <li>• Not to capture, harm, kill any wildlife.</li> <li>• Disciplinary measures shall be taken if found violating company rules.</li> <li>• Not to chemicals in riparian buffer zone.</li> </ul>	Complied	
<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>FGV Bukit Keratong 11 Estate observed and implemented the established action plans, including monitoring (patrolling) of the conservation areas by Auxiliary Police. Record of monitoring (patrolling) observed maintained. Observed no monitoring outcomes that requires changed of practices or action plan.</p>	Complied	
<b>Criterion 4.5.7: Zero burning practices</b>				
<b>4.5.7.1</b>	<p>Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.</p> <p><b>- Major compliance -</b></p>	<p>FGV Bukit Keratong 11 Estate adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates.</p>	Complied	

Criterion / Indicator		Assessment Findings	Compliance
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. <b>- Major compliance -</b>	Not applicable because no evidence of any open burning activities on site.	N/A
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. <b>- Major compliance -</b>	Not applicable because no evidence of any open burning implementation on site.	N/A
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. <b>- Minor compliance -</b>	This is included in the specification of work orders in event of land preparation during a replanting. It is a standard practice in Felda Agricultural Services/FGV. The organisation excluded stages relating to shredding, pulverized and ploughing in the land preparations.	Complied
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Site Management</b>			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. <b>- Major compliance -</b>	Manual Sustainable Oil Palm Estate (Matured) Edition II replacing previous MOLSL October 2007. <ul style="list-style-type: none"> <li>• Rat Baiting - MLSL (Ed.2)-Sec.4 (1.0) E/Date 01/06/2012</li> <li>• Spraying – MLSB (Ed.2)-Sec.4 (2.0) E/Date 01/01/2012</li> <li>• Pruning – MLSB (Ed.2)-Sect (3.0) E/Date 01/06/2012</li> <li>• Circle Racking – MLSB (Ed.2)-Sect.4 (4.0) E/Date 01/06/2012</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>Harvesting and Collection at Ramp – MLSB (Ed.2) Sect 4(5.0) E/Date 01/06/2012 till Selective Spraying for Wild trees – MLSB (Ed.2)-Sect 4) E/Date 01/06/2012.</li> </ul> <p>Another Manual Sustainable Oil Palm Estate (Pre-Matured) Edition II replacing previous MOLSLS October 2007.</p> <ul style="list-style-type: none"> <li>Embroider Palm Seedling – MLSL (Ed.2)-Sect.3 (1-0) till Beneficial Plant Planting MLSL (Ed.2)-Sect.3 (11.0).</li> </ul>	
<b>4.6.1.2</b>	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. <b>- Major compliance -</b>	As in Sustainability Manual (MLSL (Ed.3) Sec 2(11.0) Dated 01/09/17 explain conservation such as terracing, planting cover crop such as Mucuna Bracteata, Calopogonium Mucunoides and Pueraria Javanica. Sighted Policy for Protection of Slopes and Riparian under FGV Plantation where statement of protecting and prevention soil erosion with cover crop, terrencing and maintain area with slope of 25 degree.	Complied
<b>4.6.1.3</b>	A visual identification or reference system shall be established for each field. <b>- Major compliance -</b>	All fields are marked and identified. Information like year planting (field number) and the total hectare is shown in all markers. There are both stencilled at the palm trees and also displayed in signages at the boundary/corners of every fields. This was observed during the field visit in both estates.	Complied
<b>Criterion 4.6.2: Economic and financial viability plan</b>			
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. <b>- Major compliance -</b>	FGVPM Keratong 11 Estate established a Budget Summary Year 2022, 2023, 2024, 2025. Among included forecasting and projected. A Management Plan including crop forecast, capital expenditure, operational expenditure, general charges, profit and loss covering the period of 2021 to 2025 had been prepared for the estate was made available to the audit team. This plan had also included mature	Complied

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		area and also for the forecasted FFB production per hectare for the period 2021 to 202. The management of FGVPM Keratong 11 Estate has a standard budgeting format. The records were reviewed during the audit. The Business Plan also included a 5-year budget/forecast financial plan.						
<b>4.6.2.2</b>	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. <b>- Major compliance -</b>	Long term annual replanting programme for FGVPM Keratong 11 Estate established and documented and reviewed annually.						Complied
		Area	2022	2023	2024	2025	2026	
		PM00A Block 6 & 7	567.56	222.17	-	-	-	
		Block 4 & 5	-	-	245.03	-	-	
		Block 3	-	-		100.26	-	
<b>4.6.2.3</b>	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment <b>- Major compliance -</b>	FGVPM Keratong 11 Estate established a Budget Summary Year 2022, 2023, 2024, 2025. Among included forecasting and projected: <ul style="list-style-type: none"> <li>• Crop production.</li> <li>• Activities: Matured-maintenance and supervising, collection, general expenses, financial cost.</li> <li>• Activities: Replanting-Main replanting work, Upkeep and maintenance, General Expenses, financial cost, collection.</li> </ul>						Complied
<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>	The meeting involving the Estate Managers on monthly basis with the Regional Zone Head for the performance review. Among presented included details on the actual vs budget i.e. crop production, fixed and direct cost, variance report on the performance						Complied

Criterion / Indicator		Assessment Findings	Compliance
		and supervisory personnel maintained a daily cost for the field operations.	
<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. <b>- Major compliance -</b>	Pricing mechanism was clearly stated in the agreement. Payments are processed and paid by the estates. Seen the payment vouchers that have been made promptly. Sampled of the Surat Perintah Kerja of contractors as below: 1. Perniagaan Maju Bera, contract number: 5300006608 dated 01/10/2022. Refer invoice number: KKT-1031 dated 30/09/2022 and Payment was conducted on 06/10/2022. 2. Wazer Jaya Enterprise, contract number: 5300006806 dated 01/07/2022. Refer invoice number: K11-1135 dated 30/06/2022 and Payment was conducted on 07/07/2022.	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>	The contracts agreements have the details about the pricing and terms & conditions. Payment was made promptly by verified the payment vouchers and interviewed with the contractors. Sample of contract agreement for contractors as per sample in 4.6.3.1.	Complied
<b>Criterion 4.6.4:</b> Contractor			
<b>4.6.4.1</b>	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. <b>- Major compliance -</b>	Clauses for the contractor to adhere the MSPO and legal requirements are spelled out in Letter dated 03/01/2022. Among details in the letter were: 1. "Telah Di maklumkan oleh Pihak Pengurusan Ladang tentang Program Pensijilan MSPO/RSPO".	Complied

Criterion / Indicator		Assessment Findings	Compliance
		2. "Memahami Keperluan yang terjangung dalam Program Pensijilan MSPO/RSPO". 3. "Sentiasa Mematuhi segala keperluan Pematuhan MSPO". 4. "Membenarkan Auditor dari Badan Pensijilan menyemak dokumen berkaitan, memeriksa operasi dan menemuramah para petugas dan pekerja kontraktor".	
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	Management has agreement with the contractors. The contract were awarded by Head Quarters and sign by both parties. Sampled of the Surat Perintah Kerja of contractors as below: 1. Perniagaan Maju Bera, contract number: 5300006608 dated 01/10/2022. Refer invoice number: KKT-1031 dated 30/09/2022 and Payment was conducted on 06/10/2022. 2. Wazer Jaya Enterprise, contract number: 5300006806 dated 01/07/2022. Refer invoice number: K11-1135 dated 30/06/2022 and Payment was conducted on 07/07/2022.	Complied
<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>	FGV Holdings Berhad has agreed for BSI auditors to verify the assessment through a physical inspection if required. This stated in the contract agreement between estate management and each contractor. Clauses for the contractor to adhere the MSPO and legal requirements are spelled out in Letter dated 03/01/2022: "Membenarkan Auditor dari Badan Pensijilan menyemak dokumen berkaitan, memeriksa operasi dan menemuramah para petugas dan pekerja kontraktor".	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	The estates will key in the Progress of Work done by the contractors into the system and Progress of Work Records will be generated. Work Completion certificate will be acknowledged by the Manager to	Complied

Criterion / Indicator		Assessment Findings	Compliance
	contractor, by checking and signing the assessment of the contractor for each task and season contracted. <b>- Major compliance -</b>	accept the works done by contractor and payment will be made according to the certificate. Verified the contract payment slip for the payment of works done by contractor.	
<b>4.7 Principle 7: Development of new planting</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>	There is no development of new planting at both visited estates.	N/A
<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>	There is no development of new planting at both visited estates.	N/A
<b>Criterion 4.7.2: Peat Land</b>			
<b>4.7.2.1</b>	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. <b>- Major compliance -</b>	There is no development of new planting at both visited estates.	N/A

Criterion / Indicator		Assessment Findings	Compliance
<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 development of new planting at both visited estates.	N/A
<b>4.7.3.2</b>	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. <b>- Major compliance -</b>	There is no development of new planting at both visited estates.	N/A
<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 development of new planting at both visited estates.	N/A
<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. <b>- Minor compliance -</b>	There is no development of new planting at both visited estates.	N/A
<b>Criterion 4.7.4: Soil and topographic information</b>			
<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. <b>- Major compliance -</b>	There is no development of new planting at both visited estates.	N/A



Criterion / Indicator		Assessment Findings	Compliance
<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. <b>- Major compliance -</b>	There is no development of new planting at both visited estates.	N/A
<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. <b>- Major compliance -</b>	There is no development of new planting at both visited estates.	N/A
<b>4.7.5.2</b>	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. <b>- Major compliance -</b>	There is no development of new planting at both visited estates.	N/A
<b>4.7.5.3</b>	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. <b>- Major compliance -</b>	There is no development of new planting at both visited estates.	N/A
<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.	There is no development of new planting at both visited estates.	N/A

Criterion / Indicator		Assessment Findings	Compliance
	- <b>Major compliance</b> -		
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - <b>Minor compliance</b> -	There is no development of new planting at both visited estates.	N/A
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - <b>Major compliance</b> -	There is no development of new planting at both visited estates.	N/A
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - <b>Major compliance</b> -	There is no development of new planting at both visited estates.	N/A
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - <b>Major compliance</b> -	There is no development of new planting at both visited estates.	N/A
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - <b>Major compliance</b> -	There is no development of new planting at both visited estates.	N/A
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - <b>Major compliance</b> -	There is no development of new planting at both visited estates.	N/A

Criterion / Indicator		Assessment Findings	Compliance
<b>4.7.6.8</b>	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. <b>- Minor compliance -</b>	There is no development of new planting at both visited estates.	N/A

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

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	Policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	<p>FGV Holdings Berhad has established Group Sustainability Policy, approved by the Board of Directors dated 17/11/2020. Refer policy no. FGV/SED/POL/001, rev. 4.0.</p> <p>The policy covers all sustainability aspects as stated under section 5. Policy as follows:</p> <ul style="list-style-type: none"> <li>5. Promoting economic growth               <ul style="list-style-type: none"> <li>5.1. Enhancing livelihood</li> <li>5.2. Profitability and efficient use of resource</li> <li>5.3. Obligation of value chain partners</li> </ul> </li> <li>6. Respecting human rights               <ul style="list-style-type: none"> <li>6.1. Equality and non-discrimination</li> <li>6.2. Upholding labour standard</li> <li>6.3. Respecting rights of indigenous peoples and local communities</li> <li>6.4. Health and safety</li> <li>6.5. Preventing harassment and abuse</li> </ul> </li> <li>7. Protecting the environment               <ul style="list-style-type: none"> <li>7.1. Efficient use of natural resource</li> <li>7.2. Managing environmental impacts</li> <li>7.3. No deforestation and planting on peat</li> </ul> </li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		7.4. Protect high biodiversity value (HBV) and High Conservation Value (HCV) areas 7.5. Limitations on the use of hazardous chemicals and agrochemicals 7.6. No open burning/use of fire 7.7. Water management 7.8. Waste management 7.9. Addressing climate change 8. Monitoring and implementation' 8.1. Transparency and reporting 8.2. Grievances management 8.3. Traceability and supply chain	
<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>	Sighted under Group Sustainability Policy stated FGV Holdings Berhad is committed to continuously improve its products and services by adopting the best possible approaches to enhance productivity and profitability by optimising resources and operational efficiencies, while minimising negative impacts on people, social and environmental. Policy briefing has been conducted on 13/01/2022.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	FGV Holdings Berhad has established SOP for Internal Audit and documented in Internal Audit Procedure, document no. FGV/GSD-SCCD/SOP/04 Version: 0.0, dated 03/09/2020. As stated in the SOP established, the internal audit was scheduled at minimum of once a year. Latest internal audit was conducted on 03-04/10/2022 by 1 internal auditor from Sustainability Compliance and Certification Department.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. <b>- Major compliance -</b>	Latest internal audit was conducted on 03-04/10/2022 by 1 internal auditor from Sustainability Compliance and Certification Department. There was 6 NCR raised during the internal audit. Notification of audit has been sent through email. Refer subject "Program Audit Dalam RSPO & MSPO 2022 Kompleks Keratong. The root cause, correction and corrective action has been recorded and accepted by the internal auditor.	Complied
4.1.2.3	Reports shall be made available to the management for their review. <b>- Major compliance -</b>	The internal audit report was documented and made available for management review. As evidence, all findings from internal audit were responded by Mill Management within the timeframe stipulated in the Audit Procedure.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. <b>- Major compliance -</b>	Sighted SOP of Management Review Meeting. Refer SOP: FGV/GSD-SCCD/SOP/06 Ver 0.0 dated 03/09/2020. Management review was conducted at minimum of once a year. Latest management review was conducted in 07/10/2022. Agenda of the meeting as below: <ol style="list-style-type: none"> <li>1. Introduction</li> <li>2. Audit Result</li> <li>3. Environment</li> <li>4. Social</li> <li>5. Management Review</li> <li>6. Health</li> <li>7. Safety</li> <li>8. Continuous Improvement</li> <li>9. Matters arising</li> </ol>	Complied

Criterion / Indicator		Assessment Findings	Compliance																																				
<b>Criterion 4.1.4 – Continual Improvement</b>																																							
<b>4.1.4.1</b>	<p>The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.</p> <p><b>- Major compliance -</b></p>	<p>Continual Improvement Action established by FGVPISB Keratong 3 POM as under main objective to maximise recycling and reducing waste of generation of by-product. Activities listed as stated included:</p> <table border="1"> <thead> <tr> <th></th> <th>Projects</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Operation</td> <td>Transfer 1 unit decanter from Triang POM to commission in Dec 2022 at RM 30K. Reduce BOD before treatment in ETP.</td> </tr> <tr> <td>2</td> <td>Environmental</td> <td>Expand width and height of Effluent Pond bund at RM 62K. This is to improve retention with possible overflowing. To complete Dec 2022 for 6 units</td> </tr> <tr> <td>4</td> <td>Environmental</td> <td>VORSEP installation in Dec 2018 to improve dust particulate RM 2M</td> </tr> <tr> <td>5</td> <td>Environmental</td> <td>Bio-Polishing Plant in 2022. Reduce BOD in final discharge</td> </tr> <tr> <td>6</td> <td>Environmental</td> <td>Upgrading of perimeter drain RM50K in July 2023</td> </tr> <tr> <td>7</td> <td>Environmental</td> <td>Operations of shredder plant to produce shredded fibre at reduced 55% moisture</td> </tr> <tr> <td>8</td> <td>Safety</td> <td>Roofing upgrading RM100K Mac 2023.</td> </tr> <tr> <td>9</td> <td>Social</td> <td>Annual Raya Celebration for employees</td> </tr> <tr> <td>10</td> <td>Social</td> <td>Yasin Reading Ceremony to instil spiritual values among the community.</td> </tr> <tr> <td>11</td> <td>Social</td> <td>Farewell Celebration</td> </tr> <tr> <td>12</td> <td>Social</td> <td>Children education performance incentive</td> </tr> </tbody> </table>		Projects	Details	1	Operation	Transfer 1 unit decanter from Triang POM to commission in Dec 2022 at RM 30K. Reduce BOD before treatment in ETP.	2	Environmental	Expand width and height of Effluent Pond bund at RM 62K. This is to improve retention with possible overflowing. To complete Dec 2022 for 6 units	4	Environmental	VORSEP installation in Dec 2018 to improve dust particulate RM 2M	5	Environmental	Bio-Polishing Plant in 2022. Reduce BOD in final discharge	6	Environmental	Upgrading of perimeter drain RM50K in July 2023	7	Environmental	Operations of shredder plant to produce shredded fibre at reduced 55% moisture	8	Safety	Roofing upgrading RM100K Mac 2023.	9	Social	Annual Raya Celebration for employees	10	Social	Yasin Reading Ceremony to instil spiritual values among the community.	11	Social	Farewell Celebration	12	Social	Children education performance incentive	Complied
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Criterion / Indicator		Assessment Findings	Compliance
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. <b>- Major compliance -</b>	FGVPISB Keratong 03 POM has conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS during the audit. The system was found to be in functional condition. Data from the stack is connected online to DOE office. Boiler smoke emission data are within the DOE limit. An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. Installation of ESP Vorsep System commissioned in Dec 2018.	Complied
<b>4.2 Principle 2: Transparency</b>			
<b>Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements</b>			
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. <b>- Major compliance -</b>	Adequate information covering on environmental, social and legal issues which are relevant to stakeholders is shared for effective participation and decision making. Handbook of RSPO Certification for FELDA and FGV were distributed to all the stakeholders. Explanation of RSPO, MSPO, ISCC and all the policies were clearly stated in the handbook. Besides, process of complaints and grievances were included in the handbook. Sampling the records of inspections and visits by the authorities were maintained such as inspection of electricity by competent engineer, DOE visits and DOSH visits.	Complied
4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.	FGVPISB Keratong 3 POM holds copies of each of the management documents that are required to be publicly available referred letter 05/12/2020. Besides, all the information such as annual report, sustainability news and policies were found available in the company's website: <a href="http://www.fgvholdings.com">www.fgvholdings.com</a>	Complied



Criterion / Indicator		Assessment Findings	Compliance
- Major compliance -			
<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. - Major compliance -	FGV Holdings Berhad has developed “Menangani Aduan dan Rungutan” procedure (Doc. No.FGV/ML-1A/L2-Pr13) issue no: 1 dated 01/06/2016) where the procedure has stated the information that provided to the stakeholders such as policies, social impact assessment and environment aspects. Stakeholder meeting has been conducted on 21/02/2022.	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> . - Minor compliance -	Admin Executive in the mill has been appointed as management official to communicate any social matters in the mill reported by stakeholders. Appointment letter dated 02/08/2022 to Mohd Amid Bedol by Manager. Refer Letter (06)4028/Ktg3/840A/RSPO/MSPO.	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. - Major compliance -	The stakeholder list was last updated on 02/01/2022 where internal and external stakeholders have been included in the list. Stakeholder meeting has been conducted on 21/02/2022.	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. - Major compliance -	FGVPISB Keratong 3 POM committed to implement and maintain traceability requirements and SOP established and documented titled: <ul style="list-style-type: none"> <li>SOP on traceability titled Standard Operating Procedure for Mill - Traceability has been established with ref no SOP: MLSL(Ed2)-Sec 4(8) dated 01/06/2012. Therein describing information of FFB flow chart from estate harvesting designated block to mill weighbridge (tickets). The mill processing records the total FFB processed for the day and the storage tank no being stored. The records include</li> </ul>	Complied

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		<p>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. 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.</p> <ul style="list-style-type: none"> <li>MSPO Supply Chain Certification (FGV/GSD-SCCD/SOP/006) Ver.01, Effective date 07/01/2021 also established and documented to track movement and traceability of FFB to mill and selling products to buyers.</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 Weighbridge Clerk monitors the despatch to the mill on daily basis to tally and tracking the volume harvesting and tonnage FFB delivered to the mill. Factors on the FFB balances in the fields are accounted for in the process and monthly summary checked by Mill Assistant Manager as PIC for Traceability.</p>	Complied
<b>4.2.3.3</b>	<p>The management shall identified and assign suitable employees to implement and maintain traceability system.</p> <p><b>- Minor compliance -</b></p>	<p>Mill Manager has appointed Mill Assistant Manager as PIC for Traceability and Supply Chain as Appointment Letter dated 12/11/2022.</p>	Complied
<b>4.2.3.4</b>	<p>Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.</p> <p><b>- Major compliance -</b></p>	<p>As sampled in FGVPISB Keratong 3 POM the transaction properly recorded for storage, sales, delivery and transportation. The FFB weighbridge ticket/despatch note is produced for all transaction to FGVPISB Keratong 3 POM. The set of documents among others consists of the following information:</p> <ul style="list-style-type: none"> <li>Weighbridge ticket - Date / D/O no / Quantity / w/bridge operator name - Total Bunches / Quality / field no.</li> <li>Despatch chit - Serial no / field no / no of bunches / tractor no.</li> <li>Delivery Note - Date/ weight / w/bridge operator / MPOB licence no.</li> </ul>	Complied

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	<ul style="list-style-type: none"> <li>Grading report for the FFB consignment</li> </ul> <p>The mill is implementing Supply Chain Management System (SCCS). Sampled for month of October 2022. A report and Summary of FFB received from Suppliers was sampled:</p> <table border="1" data-bbox="1032 576 1868 879"> <thead> <tr> <th>Supplier</th> <th>Weight (MT)</th> </tr> </thead> <tbody> <tr> <td>Felda Keratong 3</td> <td>1,107.47+1,888.75+362.37</td> </tr> <tr> <td>Felda Keratong 4</td> <td>930.56+3,484.46+1,418.04</td> </tr> <tr> <td>Felda Keratong 5</td> <td>994.29+3,033.96+2,346.61</td> </tr> <tr> <td>Felda Keratong 6</td> <td>1,311.68+3,533.53+342.16</td> </tr> <tr> <td>Felda Keratong 7</td> <td>752.30+4,393.19+118.07</td> </tr> <tr> <td>FGVPM Keratong 11</td> <td>574.31</td> </tr> <tr> <td>Eng Huat Latex Concentrate</td> <td>75.56</td> </tr> <tr> <td>Total</td> <td>26,667.31</td> </tr> </tbody> </table> <p>Kernel sold for Month of October 2022:</p> <table border="1" data-bbox="1032 930 1868 1066"> <thead> <tr> <th>Buyer</th> <th>Quantity (MT)</th> </tr> </thead> <tbody> <tr> <td>Wilmar Kuantan Edible Oil</td> <td>351.02</td> </tr> <tr> <td>FGV Kernel Semambu</td> <td>819.30</td> </tr> <tr> <td>Total</td> <td>1,170.32</td> </tr> </tbody> </table> <p>CPO sold for the month of October 2022:</p> <table border="1" data-bbox="1032 1114 1868 1249"> <thead> <tr> <th>Buyer</th> <th>Quantity (MT)</th> </tr> </thead> <tbody> <tr> <td>Delima Oil Product</td> <td>3,109.25</td> </tr> <tr> <td>FGV Bulkiers-FOD P. Gudang</td> <td>1,399.63</td> </tr> <tr> <td>Total</td> <td>4,508.88</td> </tr> </tbody> </table>	Supplier	Weight (MT)	Felda Keratong 3	1,107.47+1,888.75+362.37	Felda Keratong 4	930.56+3,484.46+1,418.04	Felda Keratong 5	994.29+3,033.96+2,346.61	Felda Keratong 6	1,311.68+3,533.53+342.16	Felda Keratong 7	752.30+4,393.19+118.07	FGVPM Keratong 11	574.31	Eng Huat Latex Concentrate	75.56	Total	26,667.31	Buyer	Quantity (MT)	Wilmar Kuantan Edible Oil	351.02	FGV Kernel Semambu	819.30	Total	1,170.32	Buyer	Quantity (MT)	Delima Oil Product	3,109.25	FGV Bulkiers-FOD P. Gudang	1,399.63	Total	4,508.88	
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<p><b>Criterion 4.3.1 – Regulatory requirements</b></p>																																				

Criterion / Indicator	Assessment Findings	Compliance
<p><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></p>	<p>FGVPISB Keratong 3 POM, the lists of permits/licenses which has to be monitored and updated periodically include;</p> <ol style="list-style-type: none"> <li>1. MPOB Licence #5001946604000 valid from 01/04/2022 to 31/03/2023</li> <li>2. Diesel Permit #PHG/RPN/020/96 SK(D) for 15,000 Liters valid from 17/12/2021 to 16/12/2024</li> <li>3. Approval for working overtime not more than 130 hours from JTK #BHG.PU/9/134Jld37(6) dated 11/03/2021</li> <li>4. Weighbridge inspection by Metrology Sdn Bhd #0021516-6BK dated 08/12/2021</li> <li>5. Lesen Bagi Pemasangan Persendirian #2022/02132 valid from 14/07/2022 to 13/07/2023</li> <li>6. Jadual Pematuhan #005103 valid from 01/07/2022 to 30/06/2023</li> <li>7. Air Receiver #PH PMT 3677 valid until 11/10/2023</li> <li>8. Boiler #PH PMD 699 valid until 11/10/2023</li> <li>9. Competence person for CePSWaM to Asst Engineer NRIC 960130-XX-XXXX #CePSWaM/2216128 valid until 28/07/2022</li> <li>10. Competence person for CePPOME to Asst Engineer NRIC 911103-XX-XXXX #CePPOME/00197 dated 30/10/2020</li> </ol> <p>The operation of Fume Hood and Two Units of Genset found non-compliance to applicable subsidiary legal requirements under Environmental Quality Act 1974.</p> <ol style="list-style-type: none"> <li>1. One units of Fume Hood in Laboratory found not having Written Approval or Notified to DOE under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 as required.</li> </ol>	<p>Minor Non-Conformities</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p>2. Two units of genset with capacity of 150 kVA and 250 kVA using diesel fuel which having License (Form F) No. 2022/02132, however both fuel burning equipment found not yet notified to DOE under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 as required.</p> <p>Thus, Minor NC was raised.</p>	
<b>4.3.1.2</b>	<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 applicable laws identified were listed in Register of Legal and Other Requirements (Daftar Perundangan dan Lain-lain Keperluan), document no. FGV/GSD-SR/LR001. Latest review was conducted on 17/05/2022. The sample of Act and Legal as listed as follows:</p> <ol style="list-style-type: none"> <li>1. OSHA 1994</li> <li>2. Pesticides Act 1974 and Regulations,</li> <li>3. Environmental Quality Act and Regulations 1974</li> <li>4. Factories and Machinery Act and Regulations, 1967</li> <li>5. Weights and Measures Regulations 1981</li> <li>6. Electricity Regulations 1994</li> <li>7. Immigration Act 1959</li> <li>8. Employee Provident Fund 1991</li> <li>9. Minimum Wages Order 2022</li> <li>10. Peraturan – Peraturan Perkhidmatan BOMBA (Amendment) 2022</li> </ol>	Complied
<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>FGV Holdings Berhad have centralised system for tracking any changes in the law as per "Panduan: Sistem Pengesanan Perubahan Undang-undang" dated 23/6/2015, Version:04. Any changes in the relevant regulations are through Plantation and Sustainability Department and the Manager, who are sole responsible.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
<b>4.3.1.4</b>	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. <b>- Minor compliance -</b>	The Assistant manager is the person in charge of Compliance to Law and Regulation as per appointment letter dated 07/03/2022 with reference letter (01)4028/Ktg3/840A/RSPO/MSPO.	Complied
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. <b>- Major compliance -</b>	FGVPISB Keratong POM has the legal land use rights, and the land is belonged to FGV Palm Industries Sdn Bhd. This has verified through the land title # 3693, Lot No.: PT 8122 for the usage of palm oil factory. This has confirmed with the local communities that no land dispute was reported.	Complied
<b>4.3.2.2</b>	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. <b>- Major compliance -</b>	FGVPISB Keratong POM has the legal land use rights, and the land is belonged to FGV Palm Industries Sdn Bhd. This has verified through the land title # 3693, Lot No.: PT 8122 for the usage of palm oil factory. This has confirmed with the local communities that no land dispute was reported.	Complied
<b>4.3.2.3</b>	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. <b>- Major compliance -</b>	The mill is located in the host estate FELDA Keratong 3. It is separated by means of fencing and effluent. The mill operates under land title detailed as follows: <ul style="list-style-type: none"> <li>Hak milik 03/PN - 0009860 - total area 61860 cubic meters.</li> <li>Lot No 0013469 /lot 13469 - Mukim Keratong.</li> </ul>	Complied
<b>4.3.2.4</b>	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).	There is not land dispute recorded. This verified as per stakeholder meeting record dated 21/02/2022 and complaint/ grievances record.	Complied

Criterion / Indicator		Assessment Findings	Compliance
- Minor compliance -			
<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>	The mill land is legally owned by Felda Palm Industries Sdn Bhd as verified the land title record. The existing land is not encumbered by any customary land rights.	N/A
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. <b>- Minor compliance -</b>	The mill land is legally owned by Felda Palm Industries Sdn Bhd as verified the land title record. The existing land is not encumbered by any customary land rights.	N/A
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. <b>- Major compliance -</b>	The mill land is legally owned by Felda Palm Industries Sdn Bhd as verified the land title record. The existing land is not encumbered by any customary land rights.	N/A
<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 conducted on 08/03/2021 by Sustainability Compliance and Certification Department, Group Sustainability Division, FGV Holdings Bhd for FGVPISB Keratong 3 POM and FGVPK Keratong 11 Estate. Internal and external stakeholders were involved during the assessment. SIA Management Plan has been established dated 29/11/2021. Topics covered were: 1. Issue 2. Outcome	Complied

Criterion / Indicator		Assessment Findings	Compliance
		3. Person In charge 4. Timeframe 5. Evidence of action taken and status.	
<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>	FGV Holdings Berhad has developed procedure of dealing with complaint and grievances. Refer SOP: FGV/ML-1A/L2-Pr13 Issue No. 2 Rev. 02 dated 01/04/2019. The objectives of the procedure are to provide a channel for the internal stakeholders and external stakeholders to lodge any complains to the management. Mechanism to handle complaints was clearly described in the procedure. The time frame for investigation of the issue should be done within 14 working days. Refer Section 9 Carta Alir Proses Aduan.	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>	FGVPISB Keratong POM has implemented Complaint and Response Form/ Book to record complaints or requests from the stakeholders. Most of the complaints were about defects of housing facilities. Based on the records of complaints lodged, the actions taken by the management were appropriate and timely manner. Sample s below: <ol style="list-style-type: none"> <li>1. Complainant: Mr Zamrul Haizan, Felda Keratong 4, Issue: Sliding gate damage dated 25/08/2022. Issue has been solved on 07/09/2022</li> <li>2. Complainant: Mr Saifol Izhar, Felda Keratong 5, Issue: FFB Price Signage not clear dated 20/09/2022. Issue has been solved on 03/10/2022</li> </ol>	Complied



Criterion / Indicator		Assessment Findings	Compliance
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. <b>- Minor compliance -</b>	The complaint record book was available in the office area where the stakeholders can easily access to lodge their complaint.	Complied
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. <b>- Minor compliance -</b>	From the interview with internal and external stakeholder during stakeholder consultation found that they were aware of the complaint procedure and were briefed by the management during stakeholder meeting. The record of complaint record was as available in Mill record.	Complied
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. <b>- Major compliance -</b>	The records of complaint for the past 24 months (since Dec 2019) were available in the complaint's records book.	Complied
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. <b>- Minor compliance -</b>	FGVPISB Keratong 3 POM has contribute to local communities. Sighted record of CSR activities for the year of 2022: 1. Transport (Van) for Student Sekolah Agama Rakyat KAFA (F) Keratong 3 dated 04/10/2022 2. Iftar at Mill dated 15/04/2022 3. Donation to Palestine dated 11/06/2021 4. Transport (Van) for Student Kelab Hoki Keratong 3 dated 21/02/2022	Complied
<b>Criterion 4.4.4: Employees safety and health</b>			

Criterion / Indicator		Assessment Findings	Compliance
<b>4.4.4.1</b>	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. <b>- Major compliance -</b>	Sighted Group Occupational Safety & Health Management Policy established, documented and implemented as follows: 'Pernyataan Polisi Kesihatan Dan Kesihatan Keselamatan signed by CEO (Mohd Nazrul Izam Mansor) dated 05/11/21". Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors. The Policy is implemented among others through the OSH activities stated in OSH Programmes 2022.	Complied
<b>4.4.4.2</b>	The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).	a) The Safety and Health Policy was communicated to employee as posted in office, mill area for reference and awareness. Morning rollcall meeting used to brief employee on policies and Safety and health Plan. Policy training conducted by management to stakeholder dated 10/11/2022. b) HIRARC was conducted and reviewed on 15/03/2022 as sampled form no FGV/PUC-OSH/F1.2 Pind.0 for all mill activities. Further sampling on Kernel Plant process under operating of polishing drum found exposure to rotating parts with risk score 2 (LOW) but Recommended Control Measure: to install cover for drive chain and cover at front drum hole. Monitoring and implementation can be improved for fencing and guarding mechanism as per HIRARC for Kernel Plant process under operating of polishing drum. Thus, OFI was raised.  A revise Chemical health Risk Assessment was conducted by Yellow Tulip Resources as sighted Post CHRA Briefing for FGV PISB Keratong 3 POM. Assessment done on Laboratory, water treatment plant, scheduled waste, workshop, oil room/diesel tank and boiler. Initial Noise Risk Assessment was conducted by MZ EnviroTesting & Consulting by Azri Mohamed Ali (HQ/11/PEB/00/116) On	OFI

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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>14/05/2020. Audiometric test to be conducted to employees at Boiler House, Engine Room, Oil Room, Sterilizer, Press Station and Kernel Plant. Annual Audiometric Report conducted on 03/06/2022 by Dr. Ahmad Ikhwan Shah b. AkhtarAli (JKKP/HQ/12/DOC/00/258). A total of 50 employees tested on 03/06/2022, 6 on 09/06/2022, 1 on 21/06/2022. Result: 11 under Normal Audiograms, 5 under Hearing Impairment, 18 with Standard Threshold Shift, 0 Retest, 23 under Hearing Loss. Total 57 employees at risk (with variable risk rating). Audiometry Retest results conducted on 22-23/09/2022: 2 (11.11%) under Normal Hearing, 3 (16.67%) Hearing Loss, 1 (5.56%) Hearing Impairment, 12 (66.67%) Permanent Standard Threshold Shift.</p> <p>c) The awareness training program for employee exposed to chemicals has been included in the training program established. Training has been conducted that relates on safety and health. Detail of training as per indicator 4.4.6.1.</p> <p>d) PPE Matrix for FGVPISB Keratong 2 POM sighted and among required PPEs: Workshop: Leather gloves, Safety helmet, Safety Boots. Lab: Nitrile glove, Safety Goggle, Lab coat, Lab shoes. Boiler: Leather gloves, Face shield, Heat assistant apron/suit, Safety helmet, Safety boots. Available PPE Issuance record (Mohd Jasman (Shift B /General), Mohd Akhyar (Lab), Mohd Redzuan (General), Azman (Lab), Mohd Fairus (Supervisor) as sampled. In 2022 a list of safety shoes issued to 84 workers issued in August 2022.</p> <p>e) Safe Operating Procedure for Chemical Management (FPI-PK-036), Issued 14/05/2022. Purpose to ensure safe and healthy practice for</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>chemical handling and management in mill. Medical Surveillance was conducted on 21/11/2022 by Dr. Khairul Fahmi (HQ/19/DOC/00/00506) from MZ Enviro Testing &amp; Consulting.</p> <p>f) Available SHC Organization Chart dated 12/11/2022 where Chairman is Mohd Nazri Ab Rahman (Mill Manager), Umar Abdul Aziz B. Rahman (Asst Manager) as Secretary, Employees Representatives and Employer Representatives. Appointment Letter for members dated 02/08/2022 approved by Mill Managers.</p> <p>g) Safety and Health Committee (SHC) meeting was conducted regularly on 19/09/2022, 20/06/2022, 28/03/2022. The status of accident and statistics discussed and documented in the minute of meeting conducted quarterly.</p> <p>h) Fire Drill, Emergency Response and Fire Fighting was conducted on 11/06/22. Emergency Preparedness and Response Procedure (FPI/L2/QOHSE-14.0) Rev.02 dated 15/09/14 established and documented. Type of emergency situation, preparation and action plan including evacuation clearly defined as sampled in the procedure. During site visit found mill not maintaining the condition of pump room and water tank for firefighting system as Fire Certificate requirements is currently not applicable. Mill currently excluded from Fire Certificate requirements. Existing quantity and provision of portable fire extinguishers can be further allocated for preparedness purpose. Thus, OFI was raised.</p> <p>i) Available Checklist of 1<sup>st</sup> Aid Box (Office) dated 20/11/2022 by Abd Samad Yusop where 16 items listed as the document. (Lampiran 1). Available list of 1<sup>st</sup> Aider naming 13 employees such as Zarina bt. Abdullah, Mohd Zainol b. Shuib, Firdaus b. Che Rasid and ect.</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		j) Accident report has been submitted via JKPP 8 report. There is no accident recorded.	
<b>Criterion 4.4.5:</b> Employment conditions			
<b>4.4.5.1</b>	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. <b>- Major compliance -</b>	FGV Holdings Berhad has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.0 (B). Respecting Human Right. FGV is committed and support human rights. Communication to the employees was done in various methods such as briefing during morning muster, display on notice boards at workers' hostel and training. Interview with workers showed that they have a good understanding on human rights.	Complied
<b>4.4.5.2</b>	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. <b>- Major compliance -</b>	FGV Holdings Berhad has established Equal Opportunity Policy Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.2.1 Equality and Non-Discrimination. The company is committed to ensure all the employees are treated equally regardless of race, nationality religion, gender, age and other political opinions. Interview with the workers showed that no discrimination is being practiced.	Complied
<b>4.4.5.3</b>	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. <b>- Major compliance -</b>	FGV Holdings Berhad has established an employment contract for workers. Pay and conditions are documented and are above the Minimum Wage Order 2020. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Based on the document verification confirmed that the workers were paid in accordance with Minimum Wage Order 2022. Sample contract	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>agreement and payslip month of March 2022, June 2022 and September 2022 as below:</p> <ol style="list-style-type: none"> <li>1. Employee ID: 1207165</li> <li>2. Employee ID: 1205819</li> <li>3. Employee ID: 1204037</li> <li>4. Employee ID: 1207147</li> <li>5. Employee ID: 1208643</li> <li>6. Employee ID: 1211895</li> <li>7. Employee ID: 1202747</li> <li>8. Employee ID: 1212680</li> </ol>	
<b>4.4.5.4</b>	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p><b>- Minor compliance -</b></p>	<p>There was no permanent contractor engaged by the mill. FFB transport were conducted by parent company which is FGV Transport. Sample of upkeep work contract which is (Mohd Nur Aliff Bin Kidam). Offer letters were issued and acceptance of offer were acknowledged, and copies were kept by the workers. This has been verified through interview with contractor. The terms and conditions such as salary, termination of employment, annual leave entitlement and probation period were clearly stated in the Contract Agreement dated 14/07/2021. Refer SPK 3301529553 dated 31/12/2021. Sighted evidence of contribution of EPF, SOCSO and EIS by both employer and employee in the monthly payslip. Sample of contract agreement and payslip month of September 2022 and October 2022 as below:</p> <ol style="list-style-type: none"> <li>1. NRIC: 830724-XX-XXXX</li> <li>2. NRIC: 990121-XX-XXXX</li> </ol>	Complied
<b>4.4.5.5</b>	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers</p>	<p>All the recruited workers will be registered in the Human Resource Management System (HRMS) where personal details such as name,</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	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>	nationality, date of employed, job description, wage rate, date of birth, gender and entitlement of public holiday was stated in the biodata form.	
<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 shall be made available for each and every employee indicated in the employment records. <b>- Major compliance -</b>	The record Offer letters were issued, and acceptance of offer were acknowledged, and copies were kept by the workers. This has been verified through interview with workers. The terms and conditions such as salary, termination of employment, annual leave entitlement and probation period were clearly stated in the Contract Agreement. Sample contract agreement and payslip month of March 2022, June 2022 and September 2022 as below: 1. Employee ID: 1207165 2. Employee ID: 1205819 3. Employee ID: 1204037 4. Employee ID: 1207147 5. Employee ID: 1208643 6. Employee ID: 1211895 7. Employee ID: 1202747 8. Employee ID: 1212680	Complied
<b>4.4.5.7</b>	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. <b>- Major compliance -</b>	The working hours are recorded using punch card system where the attendance can be verified through the punch card of individual workers. The time enter, break time and exit of work were also clearly stated in the punch card. Sample contract agreement and payslip month of March 2022, June 2022 and September 2022 as below: 1. Employee ID: 1207165 2. Employee ID: 1205819	Complied

Criterion / Indicator		Assessment Findings	Compliance
		3. Employee ID: 1204037 4. Employee ID: 1207147 5. Employee ID: 1208643 6. Employee ID: 1211895 7. Employee ID: 1202747 8. Employee ID: 1212680	
<b>4.4.5.8</b>	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p><b>- Major compliance -</b></p>	<p>Based on the records review of the Punch card of sampled workers it was found that the entry time and exit time which were clearly stated in the punch card, conformed to the terms and conditions stipulated in the collective agreement. Refer Perjanjian Bersama antara FGV Palm Industries Sdn Bhd dengan Kesatuan Pekerja-pekerja FGV Palm Industries Sdn Bhd Semenanjung.</p>	Complied
<b>4.4.5.9</b>	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p><b>- Major compliance -</b></p>	<p>Documented payslip was distributed to individual workers on the day of payment. Wages and overtime were paid according to the "Punch Card". Total hours of overtime and daily attendance has recorded in the timecard. Sample contract agreement and payslip month of March 2022, June 2022 and September 2022 as below:</p> 1. Employee ID: 1207165 2. Employee ID: 1205819 3. Employee ID: 1204037 4. Employee ID: 1207147 5. Employee ID: 1208643 6. Employee ID: 1211895 7. Employee ID: 1202747 8. Employee ID: 1212680	Complied



Criterion / Indicator	Assessment Findings	Compliance
<p><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.</p> <p><b>- Minor compliance -</b></p>	<p>The management has provided facilities such as mosque, recreational facilities such as futsal field, badminton court and volleyball court to the workers and dependents. Government clinic was available in the complex. The workers will be granted bonus once a year based on performance of the workers. Incentive and allowance were given to the workers as well.</p>	<p>Complied</p>
<p><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.</p> <p><b>- Major compliance -</b></p>	<p>The mill workers housing is provided with basic facilities such as government clinic, football field, mosque, sundry shops and other amenities such as electricity and water supply from government. Line site inspection was carried out in FGVPISB Keratong 3 POM workers housing. Refer Rekod Pemantauan Perumahan dated 04/11/2022.</p>	<p>Complied</p>
<p><b>4.4.5.12</b> The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p><b>- Major compliance -</b></p>	<p>FGV Holdings Berhad has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.2.5 Preventing Harassment and Abuse. The company is committed to protect the rights of women on the reproductive and family planning. Gender Committee was developed to provide a system to channel the complaint regarding sexual harassment and violence. The last meeting was conducted on 18/08/2022. There was no issue regarding sexual harassment and violence reported. Awareness training on sexual harassment has been conducted on 26/09/2022</p>	<p>Complied</p>
<p><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</p>	<p>FGV Holdings Berhad has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.2.2 Upholding Labour Standard. The company allows the employees to join any legal association and get approval from</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
	<p>organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p><b>- Major compliance -</b></p>	<p>the management. Workers' Committee Kesatuan Pekerja-Pekerja Felda Palm Industries Sdn Bhd was established to discuss issues among the workers. Meeting minutes dated 09/06/2022 was sighted. No issue was raised. Awareness training on union has been conducted on 26/09/2022</p>	
<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.</p> <p><b>- Major compliance -</b></p>	<p>FGV Holdings Berhad has developed Human Rights Policy under Group Sustainability Policy dated 17/11/2020 and signed and Approved by Board of Directors. Refer FGV/SED/POL/001 Revision: 4.0 dated 17/11/2020 section 5.2.2 Upholding Labour Standard where the company will not recruit any individual who less than 18 years old to work in plantations. Document reviewed on the list of workers confirmed that all the employees were above 18 years old. Awareness training on no child labour has been conducted on 26/09/2022</p>	Complied
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	<p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p><b>- Major compliance -</b></p>	<p>Sighted training record that has been conducted:</p> <ul style="list-style-type: none"> <li>• Chemical handling training and scheduled waste management conducted by safety and health officer dated 10/08/2022</li> <li>• Policy training conducted by management to stakeholder dated 10/11/2022</li> <li>• Firefighting and fire drill conducted by Bomba Muadzam dated 10/06/2022</li> <li>• RSPO and MSPO Supply Chain Certification Scheme training by Sustainability executive to Stakeholder dated 22/02/2022</li> <li>• No open burning training conducted by management dated 17/10/2022</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>Sexual harassment awareness training dated 26/09/2022</li> <li>Procedure on Safety work dated 05/09/2022 at Press area.</li> <li>Complaint and grievance training dated 04/10/2022</li> <li>Training on Scheduled waste dated 22/08/2022</li> <li>HCV and RTE management training dated 08/08/2022</li> <li>Audiometric and hearing conservation training dated 29/05/2022</li> </ul>	
<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>	The training needs for the FGVPISB Keratong POM for the 2022 program has been established. The details of the training needs include categories of job descriptions, sections, and employees' group. Included in this program are subjects covering competency requirements and MSPO related to all employees based on their job description.	Complied
<b>4.4.6.3</b>	<p>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.</p> <p><b>- Minor compliance -</b></p>	Training details are planned and summarised in the OSH program 2022. This is in compliance and detailed in 4.4.6.1 above. Training program are made on annual basis. In addition, it is subject for a review during the financial year should need arises.	Complied
<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>	<p>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.</p> <p><b>- Major compliance -</b></p>	There is a Group Policy titled Statement of Environmental Policy for FGV Holdings Berhad" dated 05/11/2021 signed by the Group CEO (Mohd Nazrul Izam Mansor) mainly in relation to environmental protection. Therein the policy among others contained commitment towards.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>• To protecting the environment and conserving biodiversity through sustainable development.</li> <li>• Abide by all legislative requirement</li> <li>• Manages environmental risk and providing reasonable resources to minimise risk and pollution to environment</li> <li>• Continuing and improving efficiency towards enhancing environment.</li> </ul>	
<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>Environmental Policy for FGV Holdings Berhad” dated 05/11/2021 signed by the Group CEO (Mohd Nazrul Izam Mansor)</p> <p>Environmental Aspect and Impact Assessment (FPI/L4/QOHSE-1.7 Rev.0) dated 2/02/2022. Available Criteria for Aspect &amp; Impact Rev.0. as Assessment guidance</p> <p>Frequency: 4 (daily), 3 (weekly), 2 (monthly), 1 (Yearly)</p> <p>Severity:</p> <p>4 (court case, Damage to ecosystem, Covered by media</p> <p>3: Warning from authority, Water and air pollution</p> <p>2: Related to legal, complaint from community</p> <p>1: Not legal related, no damage to ecosystem, no complaint</p> <p>Previous Pollution case:</p> <p>4: &gt;2 time happened</p> <p>3: 2 times happened</p> <p>2: 1 time happened</p> <p>1: Never happen before</p> <p>Sighted and found List of Environmental Impact:</p> <p>1) Ozone layer depletion</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		2) Land cantamination 3) Global warming 4) Unpleasant working environment 5) Acid rain 6) Depletion of natural resources 7) Air Pollution and etc.	
<b>4.5.1.3</b>	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. <b>- Major compliance -</b>	The Social/Environmental Management Plan (Pelan Pengurusan (Management Plan) to reduce environmental impact to mill operation was established and documented for 2022 The Social/Environmental Management Plan (Pelan Pengurusan (Management Plan). The plan among others incorporated the objectives, category, action, frequency, person in charge and monitoring period. Among other issues related as extracted below: a) Domestic waste disposal b) To maximize recycling program at mill/estate c) To enhance sale of excessive shell to licensed buyer	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>	Continual Improvement Action established by FGVPIB Keratong 3 POM as under main objective to maximise recycling and reducing waste of generation of by-product. Activities listed as stated included: <ul style="list-style-type: none"> <li>• Use of EFB at field</li> <li>• Selling old scrap metal</li> <li>• Reuse back paper in office</li> <li>• Refilling back used ink printer cartridge</li> <li>• Operating of Shredder Plant to increase selling of shredded fiber.</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance															
		<p>The mill in the interim has made the following initiative for the BOD reduction among others as stated below.</p> <table border="1"> <thead> <tr> <th></th> <th>Projects</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Operation</td> <td>Transfer 1 unit decanter from Triang POM to commission in Dec 2022 at RM 30K. Reduce BOD before treatment in ETP.</td> </tr> <tr> <td>2</td> <td>Environmental</td> <td>Expand width and height of Effluent Pond bund at RM 62K. This is to improve retention with possible overflowing. To complete Dec 2022 for 6 units</td> </tr> <tr> <td>3</td> <td>Environmental</td> <td>Bio-Polishing Plant in 2022. Reduce BOD in final discharge</td> </tr> <tr> <td>4</td> <td>Environmental</td> <td>Operations of shredder plant to produce shredded fibre at reduced 55% moisture</td> </tr> </tbody> </table>		Projects	Details	1	Operation	Transfer 1 unit decanter from Triang POM to commission in Dec 2022 at RM 30K. Reduce BOD before treatment in ETP.	2	Environmental	Expand width and height of Effluent Pond bund at RM 62K. This is to improve retention with possible overflowing. To complete Dec 2022 for 6 units	3	Environmental	Bio-Polishing Plant in 2022. Reduce BOD in final discharge	4	Environmental	Operations of shredder plant to produce shredded fibre at reduced 55% moisture	
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<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>	Policy training was conducted by management to stakeholder dated 10/11/2022 in addition to briefing conducted to employee during morning meeting roll call.	Complied															
<b>4.5.1.6</b>	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. <b>- Major compliance -</b>	Environmental Performance Monitoring Committee Meeting was conducted regularly on 29/09/2022, 20/06/2022, 20/03/2022 in FGVPIB Keratong 3 POM as minute documents sampled. Member of the community included Mill Manager, Asst. Mill Manager, Lab Staff, Operation Supervisor, Storekeeper, BHC, Effluent Operator and Foreman.	Complied															
<b>Criterion 4.5.2:</b> Efficiency of energy use and use of renewable energy																		

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4.5.2.1	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period</p> <p><b>- Major compliance -</b></p>	<p>The plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations of FGVPIB Keratong 3 POM over the base period such as monthly record on energy consumption for both renewable and non-renewable sources were maintained and documented. It is monitored to optimize use of renewable energy. The data is compiled for comparison and control for future improvement with aim of gradual reduction particularly diesel. Baseline is 0.84.</p>	Complied																																												
4.5.2.2	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p><b>- Major compliance -</b></p>	<p>The utilization of fossil fuel in 2022 is being monitored with records shown below: The mill diesel utilization in 2021 is 75,643 liters. This tally's with the GHG data declaration.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB</th> <th>Diesel</th> <th>Diesel/FFB</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>17,790</td><td>8,032</td><td>0.45</td></tr> <tr><td>Feb</td><td>18,100</td><td>5,336</td><td>0.29</td></tr> <tr><td>Mac</td><td>23,860</td><td>7,073</td><td>0.30</td></tr> <tr><td>Apr</td><td>20,270</td><td>7,940</td><td>0.39</td></tr> <tr><td>May</td><td>19,350</td><td>6,552</td><td>0.34</td></tr> <tr><td>June</td><td>10,180</td><td>5,265</td><td>0.52</td></tr> <tr><td>July</td><td>20,950</td><td>7,956</td><td>0.38</td></tr> <tr><td>Aug</td><td>23,350</td><td>9,256</td><td>0.40</td></tr> <tr><td>Sept</td><td>22,640</td><td>7,387</td><td>0.33</td></tr> <tr><td>Oct</td><td>25,530</td><td>10,314</td><td>0.40</td></tr> </tbody> </table> <p>The mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running.</p> <p>Performance variation in view of several factors i.e.</p> <ul style="list-style-type: none"> <li>a) Infrastructure of estates</li> <li>b) Community size / no of gen-sets</li> </ul>	Month	FFB	Diesel	Diesel/FFB	Jan	17,790	8,032	0.45	Feb	18,100	5,336	0.29	Mac	23,860	7,073	0.30	Apr	20,270	7,940	0.39	May	19,350	6,552	0.34	June	10,180	5,265	0.52	July	20,950	7,956	0.38	Aug	23,350	9,256	0.40	Sept	22,640	7,387	0.33	Oct	25,530	10,314	0.40	Complied
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		c) No. of vehicles / age of machine d) Weather interference / crop production volume									
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible. <b>- Minor compliance -</b>	Currently the fibre and shell generated are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fibre are delivered to estates for multi purposes or sold to outside buyers. EFB is used in the estates for mulching.	Complied								
<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>	FGVPISB Keratong 3 POM has identified all wastes and sources of pollution. Sampled Waste Management Action Plan 2022 that was established to mitigate and control the identified wastes and source of pollution.	Complied								
<b>4.5.3.2</b>	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for: a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. <b>- Major compliance -</b>	Waste Management Plan documented and established covering wastes identified earlier and Action Plan with activities to be conducted from January-December 2022. Responsible PIC clearly stated with status and progress indicated in the action plan. In the plan clearly identified the sources of waste such as under: <table border="1" data-bbox="1025 1054 1865 1289"> <thead> <tr> <th>Source</th> <th>Type of Waste</th> </tr> </thead> <tbody> <tr> <td>Mill Operation</td> <td>POME, EFB, Kernel, Dark Ash, Tyres, Scrap metal, broken woods.</td> </tr> <tr> <td></td> <td>Scheduled waste-SW 102, SW 305, SW 408, SW 409, SW 410</td> </tr> <tr> <td>Office and housing</td> <td>Paper, plastic, domestic waste, sewage and etc.</td> </tr> </tbody> </table>	Source	Type of Waste	Mill Operation	POME, EFB, Kernel, Dark Ash, Tyres, Scrap metal, broken woods.		Scheduled waste-SW 102, SW 305, SW 408, SW 409, SW 410	Office and housing	Paper, plastic, domestic waste, sewage and etc.	Complied
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<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	Types of Scheduled Waste generated SW102, SW 305, SW 408, SW 409, SW410. Last Scheduled waste disposal on 17/12/2021. As reported inventory of Scheduled Waste Sampled for January-June 2022, found no	Complied								



Criterion / Indicator		Assessment Findings	Compliance												
	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>	new generation. Only on 5/07/2022 mill has started generated SW 305, SW410. As Consignment Note No. 100122008 dated 17/12/2021, SW408 (Contaminated Soil) disposed to Kualiti Alam Sdn Bhd using Lorry No. JPF 5939. Quantity for 0.023 MT. Consignment Note No 100122006 dated 17/12/2021, SW 410 (Used Filters & Cotton Rags) to Kualiti Alam using Lorry No JPF 5939 for 0.013 MT. Consignment Note No. 100122R01, SW305 (Lubricating Oil) to Kualiti Alam using Lorry No. JPF 5939 with quantity 1 Drum.													
<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>	The domestic waste was collected by the estate twice a week and dump at designated area before collected by the municipal collectors. Sighted the records of rubbish collection in Estate Vehicle Work Distribution. Sighted a letter from Mill Manager dated 02/01/2022 to all employees of FGVPIB Bukit Keratong 3 POM prohibited open burning practices including domestic waste.	Complied												
<b>Criterion 4.5.4: Reduction of pollution and emission</b>															
<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	Available Identification of Source of GHG Gas and Reduction of GHG Emission 2022. Among included: <table border="1" data-bbox="1032 1061 1870 1321"> <thead> <tr> <th>Activity Produced GHG</th> <th>Action to Reduce Impact</th> <th>PIC</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>Use of vehicle for transport FFB, EFB, Shell, Fibre push cages,</td> <td>Switch off engine</td> <td>Driver</td> <td>Recording diesel usage</td> </tr> <tr> <td>Diesel use for genset</td> <td>Reduce use of genset</td> <td>BHC</td> <td>Recording diesel usage</td> </tr> </tbody> </table>	Activity Produced GHG	Action to Reduce Impact	PIC	Status	Use of vehicle for transport FFB, EFB, Shell, Fibre push cages,	Switch off engine	Driver	Recording diesel usage	Diesel use for genset	Reduce use of genset	BHC	Recording diesel usage	Complied
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		Produce POME	Install decanter	MM	To request decanter from Triang POM	
		Boiler operation	Increase Boiler efficiency	BHC	Weekly maintenance	
		Waste disposal and landfill	Only Organic waste dispose	MM	No open burning and disposal of plastic containers	
		Mill found monitored and maintained records on Palm GHG as reported using RSPO Calculator. Inclusive in the report are the plantation/field emission data from field emission and sinks (tCO2e/t FFB) and mill emission from mill emission and credits (tCO2e/t FFB).				
<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>	Available and established an Action Plan to Reduce Significant Impact to Environment signed by Mohd Nazri b. Ab Rahman (Mill Manager) dated 29/01/2020. Among in the plan included: <ul style="list-style-type: none"> <li>• Disposal of Empty Fruit Brunch (EFB): Operational of Shredded Plant</li> <li>• Control of GHG gas emission: Reduce diesel consumption</li> <li>• Reduce Environmental impact: Disposal of scheduled waste</li> <li>• Maximizing recycling: Selling of scrap metal.</li> </ul>				Complied
<b>4.5.4.3</b>	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.	The POME was treated, and sampling was done annual at Final Discharge Point and submitted to DOE through Quarterly Statement Form. Observed no overflowing, by-pass and flow meter recording on daily basis. Below are data of sampled and monitored by Chemist from FGV Palm Industries Sdn. Bhd. submitted on 3 <sup>rd</sup> Quarter of 2022:				Complied

Criterion / Indicator		Assessment Findings	Compliance																																													
	- Major compliance -	<p>No overflow was observed, and flow meter reading was recorded daily. The mill monitors the effluent and submits to DOE through 'Borang Penyata Suku Tahunan'.</p> <table border="1"> <thead> <tr> <th>Sample date</th> <th>Std</th> <th>05/7/22</th> <th>30/8/22</th> <th>20/9/22</th> </tr> </thead> <tbody> <tr> <td>PH</td> <td>5.-9.</td> <td>8.25</td> <td>8.35</td> <td>8.44</td> </tr> <tr> <td>BOD</td> <td>100</td> <td>65</td> <td>81</td> <td>77</td> </tr> <tr> <td>COD</td> <td>-</td> <td>452</td> <td>614</td> <td>401</td> </tr> <tr> <td>Total solids</td> <td>-</td> <td>5354</td> <td>2694</td> <td>2832</td> </tr> <tr> <td>S Solids</td> <td>200</td> <td>152</td> <td>298</td> <td>116</td> </tr> <tr> <td>Oil &amp; grease</td> <td>5.0</td> <td>11</td> <td>11</td> <td>2</td> </tr> <tr> <td>A Nitrogen</td> <td>20</td> <td>66</td> <td>66</td> <td>58</td> </tr> <tr> <td>Total N</td> <td>200</td> <td>82</td> <td>81</td> <td>90</td> </tr> </tbody> </table>	Sample date	Std	05/7/22	30/8/22	20/9/22	PH	5.-9.	8.25	8.35	8.44	BOD	100	65	81	77	COD	-	452	614	401	Total solids	-	5354	2694	2832	S Solids	200	152	298	116	Oil & grease	5.0	11	11	2	A Nitrogen	20	66	66	58	Total N	200	82	81	90	
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<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> <ol style="list-style-type: none"> <li>Assessment of water usage and sources.</li> <li>Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</li> <li>Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> </ol> <p>- Major compliance -</p>	<p>The mill established a Water Management Plan has been reviewed in 06/06/2022. Among others the plan therein emphasized;</p> <ol style="list-style-type: none"> <li>Sources of water: <ul style="list-style-type: none"> <li>Drinking water from government treated facility</li> <li>Rainwater harvesting for cleaning purposes.</li> <li>Water from the reservoir/catchment for the mill operations.</li> <li>Monitoring and sampling water quality: <ul style="list-style-type: none"> <li>Sampling at final water discharge point</li> </ul> </li> </ul> </li> <li>The mill made an annually water samples at 2 points in the river nearby i.e hulu &amp; hilir Sg Keratong on monthly basis. Similar sampling for the estate was made in Sg Kemabai results as shown below. No major issues were noted/recorded.</li> </ol>	OFI																																													

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Criterion / Indicator		Assessment Findings				Compliance
					Awareness on water usage efficiency. Outsource from neighboring estates.	
		4	Drain upkeep	Interruption water flow at drainage system.	Periodic desilting Building of sand bags at specific points to contain water (weirs)	
		5		Water pollution	Prohibit workers from activities at water source Drinking water analysis. Monitor condition of septic tank Adhere SW management procedure to avoid pollution caused by SW.	
		Mill can further enhance monitoring and identification of water leakage from piping system and water pump to preserve water resources and complying to Water Management Plan established. Thus, OFI was raised.				
<b>4.5.5.2</b>	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations. <b>- Major compliance -</b>	In presentation meeting with CEO of FGVSIB, the Mill Manager has made a presentation for Mill Improvement-Effluent Treatment Plant as sampled from slide, Land irrigation 80-100 Ha to Felda Keratong 3 Estate. A discussion with independent smallholder with Quality Unit HQ will be organized to explain the benefit and provide clear understanding on the system to their fields.				Complied

Criterion / Indicator	Assessment Findings	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><b>- Major compliance -</b></p>	<p>FGVPISB Keratong 3 POM processing system is documented in the following documents among others:</p> <ul style="list-style-type: none"> <li>• The Mill Lestari Processing Manual</li> <li>• Mill Standard Operating Procedure</li> <li>• The Mill Quality Management Manual</li> <li>• Sustainability Safety Procedure</li> </ul> <p>These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from:</p> <p>The reception, sterilization, threshing, pressing, Clarification, depericarping (nut polishing) station, Effluent, laboratory, workshop, dispatches etc.</p>	Complied
<b>4.6.1.2</b>	<p>All palm oil mills shall implement best practices.</p> <p><b>- Major compliance -</b></p>	<p>The mill maintained all records of monitoring and available for review. There are several levels of records beginning from the field/mill supervisors to executives and the Managers. The Regional Controller (RC) are accountable to monitor the estates compliance towards the SOP, budget and productivity among others. Estates / Mill performances are reviewed during the monthly meeting with RC/ZH.</p>	Complied
<b>Criterion 4.6.2: Economic and financial viability plan</b>			

Criterion / Indicator		Assessment Findings	Compliance
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p><b>- Major compliance -</b></p>	<p>The annual business plan 2022-2027 is available. The document is in the form of annual budget and the projection for 6 years prepared as guidance for future planning. The business plan contains FFB processed, production of CPO &amp; CPK. The Component of operating expenditure among others includes:</p> <ul style="list-style-type: none"> <li>• Process labour,</li> <li>• Maintenance external, maintenance parts,</li> <li>• Consumable, EVIT,</li> <li>• Admin cost,</li> <li>• Labour overhead.</li> </ul> <p>Estimation of General and Nett Income clearly forecasted as seen with estimation of FFB pricing.</p>	Complied
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
4.6.3.1	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p><b>- Major compliance -</b></p>	<p>There was no permanent contractor engaged by the mill. FFB transport were conducted by parent company which is FGV Transport. Sample of upkeep work contract which is (Mohd Nur Aliff Bin Kidam). Refer SPK 3301529553 dated 31/12/2021.</p>	Complied
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p><b>- Major compliance -</b></p>	<p>The contracts have been detailed out the pricing and the conditions of the FFB to be supplied to the mill. Payment was made promptly by verified the payment vouchers.</p> <p>There was no permanent contractor engaged by the mill. FFB transport were conducted by parent company which is FGV Transport. Sample of upkeep work contract which is (Mohd Nur Aliff Bin Kidam). Refer SPK 3301529553 dated 31/12/2021.</p>	Complied

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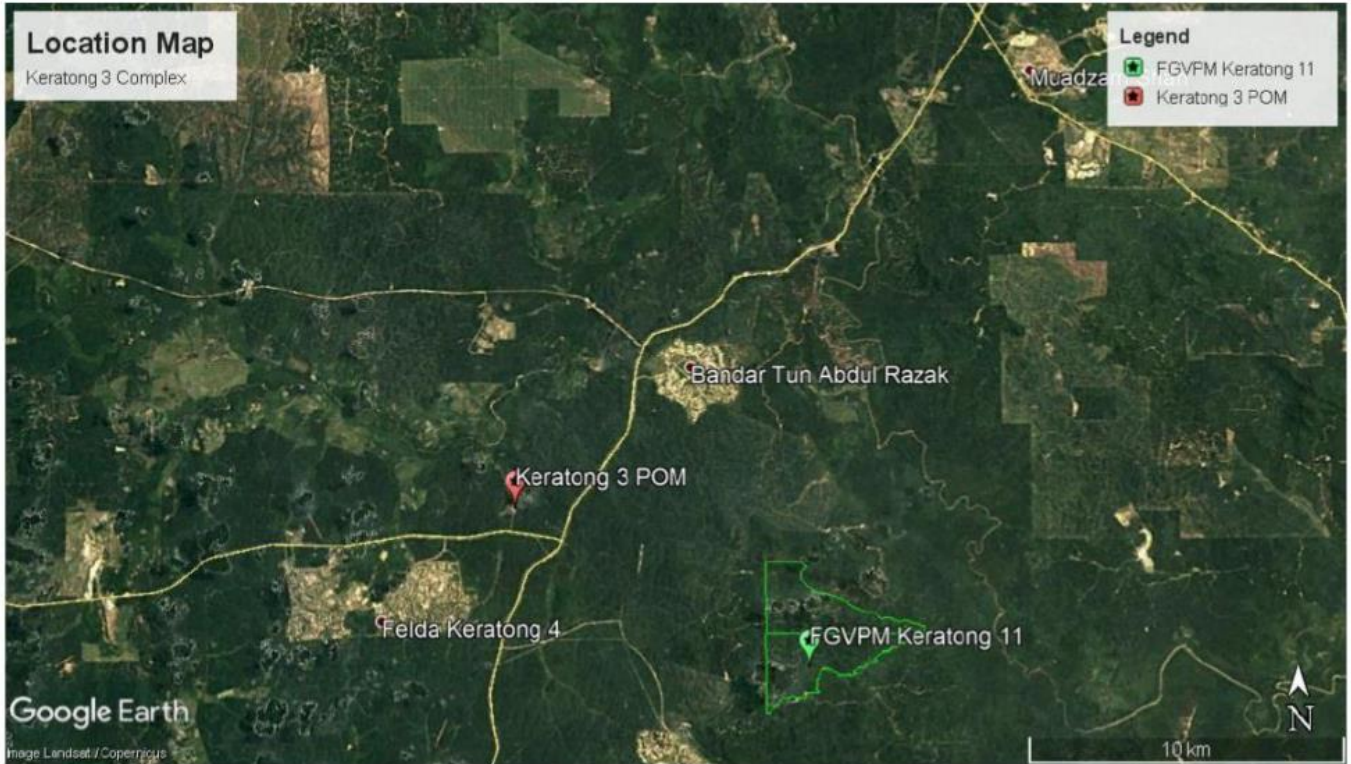
Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.6.4:</b> Contractor			
<b>4.6.4.1</b>	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. <b>- Major compliance -</b>	The contractors have acknowledged on a letter regarding the compliance of MSPO requirements and allowed the auditors to inspect relevant documents, operations and interview the workers whenever necessary. They were also briefed by the management regarding the MSPO requirements.	Complied
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	Sample of upkeep work contract which is (Mohd Nur Aliff Bin Kidam). Refer SPK 3301529553 dated 31/12/2021.	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>	Sample of upkeep work contract which is (Mohd Nur Aliff Bin Kidam). Refer SPK 3301529553 dated 31/12/2021. Refer Supplier Code Of Conduct, FGV Holdings Berhad stated on the contractor was accept MSPO approved auditors to verify the assessments through a physical inspection.	Complied



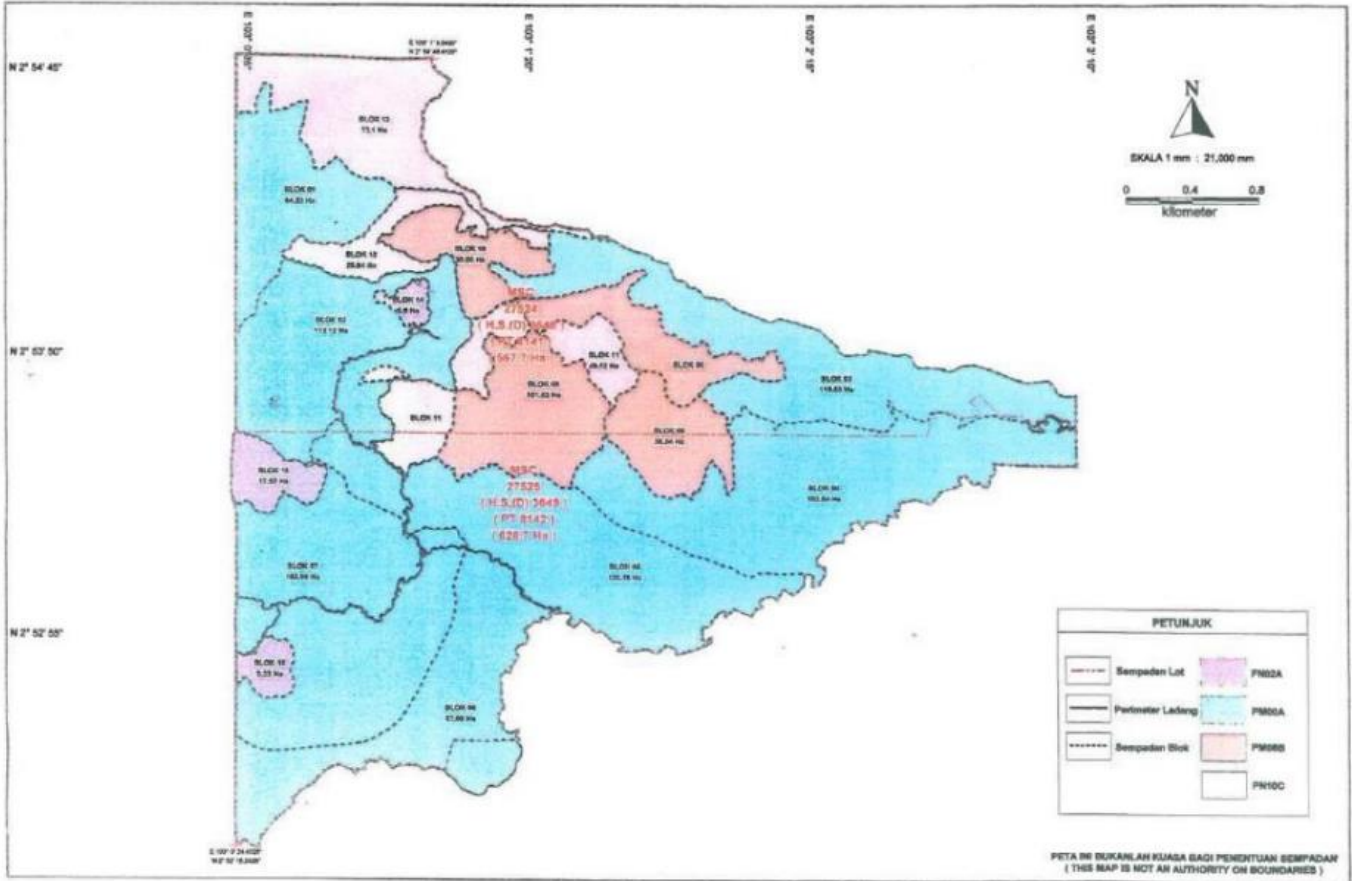


**Appendix C: Location and Field Map**

**FGVPISB Keratong 3 POM**



**FGVPM Keratong 11 Estate**



**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