

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

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

GENTING OIL MILLS (SABAH) SDN BHD
Client Company (HQ) Address: 10th Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
Certification Unit: Genting Jambongan Oil Mill and Genting Jambongan Estate
Date of Final Report: 17/8/2023

Report prepared by:
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Report Number: 3717736

Assessment Conducted by:
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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	Genting Oil Mills (Sabah) Sdn Bhd		
Mill/Estate	Certification Unit	MPOB License No.	Expiry Date
	Genting Jambongan Oil Mill	620052004000	28/02/2024
	Genting Jambongan Estate	509406502000	30/11/2023
Address	10th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia		
Management Representative	Mr. Arunan Kandasamy – Senior Vice President – Plantation (Malaysia) Mr. James Chung Khim Hon – Senior Vice President – Group Processing Ms. Erika Jesham – Sustainability Executive		
Website	http://www.gentingplantations.com	E-mail	arunan.kandasamy@genting.com james.chung@genting.com erika.jesham@genting.com
Telephone	+603 2333 6510 (Head office) +089 858350 (GJOM)	Facsimile	+603 2333 6575

1.2 Certification Information			
Certificate Number	Mill: MSPO 709462 Estate: MSPO 709464	Certificate Start Date	09/08/2019
Date of First Certification	09/08/2019	Certificate Expiry Date	08/08/2024
Scope of Certification	<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		
Visit Objectives	1. Determination of the conformity of the client's management system, or parts of it, with audit criteria. 2. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory, and contractual requirements.		
Standard	<input type="checkbox"/> MSPO MS 2530-2:2013 – General Principles for Independent Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		
Stage 1 Date	13 – 14/05/2019		
Stage 2 / Initial Assessment Visit Date (IAV)	15 – 16/05/2019		
Continuous Assessment Visit Date (CAV) 1	27 – 28/08/2020		
Continuous Assessment Visit Date (CAV) 2	22 – 23/06/2021: Remote Audit		

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Continuous Assessment Visit Date (CAV) 3	20 – 22/06/2022
Continuous Assessment Visit Date (CAV) 4	12 – 15/06/2023

1.3 Other Certifications

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 709622	RSPO Principles & Criteria of Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019	BSI Services (Malaysia) Sdn Bhd	25/08/2024
MSPO 715401	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018.	BSI Services (Malaysia) Sdn Bhd	26/08/2024
EU-ISCC-Cert-DE119-60214826	International Sustainability & Carbon Certification (EU)	ASG Certification	30/11/2022

1.4 Location of Certification Unit

Name of the Certification Unit (Palm Oil Mill/ Estate)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Genting Jambongan Oil Mill	Jambongan Island, 90100 Beluran District, Sabah, Malaysia	6° 39' 06.00" N	117° 26' 43.08" E
Genting Jambongan Estate	Jambongan Island, 90100 Beluran District, Sabah, Malaysia	6° 39' 06.00" N	117° 26' 43.08" E

1.5 Certified Area

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Jambongan Estate	3,790.14	24.36	247.80	4,062.30	93.30
Total (ha)	3,790.14	24.36	247.80	4,062.30	

1.6 Plantings & Cycle

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Jambongan Estate	0	506.27	3,283.87	0	0	3,790.14	0
Total (ha)	0	506.27	3,283.87	0	0	3,790.14	0

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1.7 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Aug 22 - Jul 23)	Actual (Jun 22 - May 23)	Forecast (Aug 23 - Jul 24)
Genting Jambongan Estate	68,300.00	82,795.70	85,700.00
Bahagia Jaya	7,990.00	9,391.00	9,500.00
Joyland Sdn Bhd	-	742.19	800.00
Roziah Hariri	69.00	27.74	30.00
Koh Shuk Kien	490.00	1,139.85	1,200.00
Mohd Najjar Bin Abdul Razak	-	132.06	150.00
Shamsul Bin Abang	-	31.28	32.00
Yazid Bin Sarip Rahman	-	18.72	20.00
Total (mt)	76,849.00	94,278.54	97,432.00

1.8 Uncertified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Aug 22 - Jul 23)	Actual (Jun 22 - May 23)	Forecast (Aug 23 - Jul 24)
Abdul Rauf Bin Jalil	15.00	37.91	45.00
Norlia Binti Abdul Wahid	10.00	1.80	2.50
Yazid Sarip Rahman	30.00	-	-
Mohd Najjar Bin Abdul Razak	25.00	-	-
Total (mt)	80.00	39.71	47.50

1.9 Certified Tonnage			
	Estimated (Aug 22 - Jul 23)	Actual (Jun 22 - May 23)	Forecast (Aug 23 - Jul 24)
	Mill Capacity: 20 MT/hr	FFB	FFB
	76,849.00	94,278.54	97,432.00
SCC Model: MB	CPO (OER: 22.70%)	CPO (OER: 20.38%)	CPO (OER: 20.48%)
	17,250.00	19,213.23	19,954.07
	PK (KER: 3.34%)	PK (KER: 4.35%)	PK (KER: 4.26%)
	2,535.00	4,098.80	4,150.60

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1.10 Actual Sold Volume (CPO)					
CPO (mt)	MSP0 Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
19,213.23	-	9,350.52	7,664.20	2,225.05	19,239.77
Note: Carry Forward CPO: 1,066.66 Mt					

1.11 Actual Sold Volume (PK)					
PK (mt)	MSP0 Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
4,098.80	-	-	3,362.69	683.48	4,046.17
Note: Carry Forward PK: 157.31 Mt					

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 12/06/2023 – 15/06/2023. The audit programme is included as Section 2.4. The approach to the audit was to treat the mill and plantations as a MSP0 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 MSP0 certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSP0 Logo and related claims.

The estates or smallholders sample were determined based on formula $S = r\sqrt{n}$ where n is the number of estates while when applicable, the smallholders sample were determined following the MSP0 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 MSP0 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.

The Major NC close out assessment was conducted offsite on 02/08/2023. Based on the NC's correction and corrective action plan, it was justified that documented evidence were sufficient as evidence of closure to address the raised NC. Documented and Pictorial Evidence was provided by the management and reviewed by the assessment team and found to have successfully address the raised NC.

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

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

Assessment Program					
Name (Mill / Plantation)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Genting Jambongan Oil Mill	✓	✓	✓	✓	✓
Genting Jambongan Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: June 10, 2024 - June 13, 2024

Total No. of Mandays: 7 Mandays

a. BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Vijay Kanna Pakirisamy (VKP)	Team Leader	<p>Education: Bachelor’s Degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010.</p> <p>Work Experience: He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad prior to joining BSI as a Client Manager.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, Endorsed RSPO P&C Lead Auditor Course in October 2019, Endorsed RSPO SCCS Lead Auditor Course in August 2020, Endorsed MSPO Lead Auditor Course in November 2019 and attended SMETA Requirements Training in April 2021.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of Occupational, Health & Safety, Estate Best Practises, Economic management plan, environmental and biodiversity conservation, Waste management and HCV Management Plans.</p>

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		<p>Language proficiency: He is fluent in English and Bahasa Malaysia languages.</p>
Nor Halis Abu Zar (NHA)	Team Member	<p>Education: Bachelor of Science, Plantation Technology and Management, graduated from UiTM in 2012 and Diploma in Plantation and Industry Management from UiTM in 2009.</p> <p>Work Experience: He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day-to-day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for MS2530:2013 and RSPO Auditor for ENV and OSH and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p>Training attended: He has completed RSPO P&C Lead Auditor Course in Oct 2020, Refresher RSPO P&C Lead Auditor Course in May 2022, RSPO ISH Standard 2019 in December 2021, RSPO SCC 2020 in September 2022, QMS 9001:2015 Lead Auditor Course in April 2019, OSH 45001:2018 Lead Auditor Course in June 2021, IMS (ISO 9001:2015 & ISO 14001:2015) Lead Auditor Course, HCV & HCS Training in August 2022, MSPO 2530:2013 Lead Auditor Course in February 2019, , MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training on May 2021.</p> <p>Aspect covered in this audit: Legal requirements, Complaints and Grievances, Employee conditions, Best Practices and Financial Management.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English Language.</p>

b. 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.

c. Accompanying Persons

No.	Name	Role
-	-	-

2.4 Assessment Plan

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

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Date	Time	Subjects	VKP	NHA
11/06/2023 Sunday	-	Auditors travel to Jambongan Island.	✓	✓
12/06/2023 Monday	0900 - 0930	Opening meeting - Opening presentation by audit team leader - Confirmation of assessment scope and finalize audit plan	✓	✓
	0930 - 1230	Jambongan Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, workers housing, clinic, Landfill, etc.	✓	✓
	1230 - 1330	Lunch break	✓	✓
	1330 - 1630	Document review P1 – P7 (MSPO Part 3): General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP, and implementation etc.	✓	✓
	1630 - 1700	Interim closing meeting	✓	✓
13/06/2023 Tuesday	0900 - 1230	Jambongan Estate Continue Document review P1 – P7 (MSPO Part 3): General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓
	1000 - 1200	Stakeholder consultation – Government Agencies, NGO, Surrounding Communities, and Contractors/Vendors. (Jambongan Oil Mill Office)	-	✓
	1230 - 1330	Lunch break	✓	✓
	1330 - 1630	Continue Document review P1 – P7 (MSPO Part 3): General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓

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Date	Time	Subjects	VKP	NHA
	1630 - 1700	Interim closing meeting	✓	✓
14/06/2023 Wednesday	0900 - 1230	Jambongan Oil Mill Site visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc	✓	✓
	1230 - 1330	Lunch break	✓	✓
	1330 - 1630	Document Review P1 – P6 (MSPO Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓-	✓
	1630 - 1700	Interim closing meeting	✓	✓
15/06/2023 Thursday	0900 - 1200	Jambongan Oil Mill Document Review P1 – P6 (MSPO Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓
	1200 - 1230	Assessment team discussion and preparation	✓	✓
	1230 - 1300	Closing Meeting	✓	✓
16/06/2023 Friday	-	Audit team travel to Kuala Lumpur	✓	✓

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, Two (2) Minor nonconformities and Zero (0) OFI raised. The Genting Jambongan Oil Mill 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			
NCR Ref #:	2357551-202306-M1	Issue Date:	15/06/2023
Due Date:	14/09/2023	Date of Closure:	02/08/2023
Area/Process:	Genting Jambongan Oil Mill	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.4.5.11 Major
Requirements:	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.		
Statement of Nonconformity:	The line site inspection was not effectively implemented.		
Objective Evidence:	During the site visit to the Mill linesite compound (Temporary Contractor House and House no. F1), it was observed that 3 units of empty lubricant containers were used for domestic purpose and 2 unit of containers were stored with petrol in the container without adequate label. Linesite inspection was conducted on a weekly basis by the Hospital Assistant, however reference done with "Rekod Pemeriksaan Mingguan Perumahan" dated 07/06/2023 and 29/05/2023 stated as "no issue" at Section 6 "Bahan Buangan Terjadual" and not reflected with actual condition. Since this is a reoccurrence of previously raised minor nonconformity, it is escalated to Major Nonconformity for this assessment.		

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Corrections:	All the containers will be cleared immediately from the house and stored in the scheduled waste store.
Root cause analysis:	The weekly housing inspection is not thoroughly done as the PIC (HA) did not fully cover the entire block and area during conducting the inspection.
Corrective Actions:	The PIC will be re-brief to conduct the inspection covering entire block and housing area including entering each the workers housing. Any findings will be recorded in the "Rekod Pemeriksaan Mingguan Perumahan" for immediate action by mill management. Workers will be re-brief on Scheduled Waste Management and Procedure so that re-use of containers that is scheduled waste will not be repeated.
Assessment Conclusion:	<ol style="list-style-type: none"> 1. All containers have been cleared by the management and stored in the Scheduled Waste Store in accordance with the Waste Management Plan. The inventory records of the chemical containers dated 16/06/2023 was verified. 2. A briefing has been conducted on the MSPO Non-conformity that has been raised at the mill. The MA, who was among the attendees, has been briefed on the requirement to conduct housing inspection covering the entire block and housing area. The briefing record dated 18/07/2023 was available for verification. 3. Scheduled Waste Refresher Training was conducted for Genting Jambongan Oil Mill workers on 01/07/2023. Scheduled Waste Refresher Training was conducted for the contractors and contractor's workers on 29/06/2023. Records of training were available for verification. 4. Line Site Inspection was conducted covering entire block and housing area including entering each individual house. Records of <i>Rekod Pemeriksaan Mingguan Perumahan</i> were verified dated 21/06/2023. <p>The implementation of the correction and corrective action plan was deemed to be able to address the raised non-conformity. Hence, the Major Non-conformity was closed on 02/08/2023.</p>

Non-Conformity Report			
NCR Ref #:	2357551-202306-N1	Issue Date:	15/06/2023
Due Date:	Next Surveillance Assessment	Date of Closure:	"Open"
Area/Process:	Genting Jambongan Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.5.4 Minor
Requirements:	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.		
Statement of Nonconformity:	Wages paid to contractor worker was not according with Minimum Wages Order 2022.		

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Objective Evidence:	Based on record verification for contractor workers for SXXXXXXX CX workers with passport AU411XXX found not paid with minimum wages salary (rate per day RM57.69). Evidence as below:					
	Month	Working days	Wages, (RM)	Rate/Day (RM)	Wages as per Rate RM 57.69/day	Diff, RM
	Jan 2023	26	1,300.58	50.02	1,499.94	-199.36
	Feb 2023	25	1,349.97	51.92	1,442.25	-92.28
	Apr 2023	27	1,314.82	50.57	1,557.63	-242.81
Corrections:	The contractor will reimburse the different amount to their worker in June 2023 salary payment.					
Root cause analysis:	No top-up being made by the contractor to ensure the worker’s salary meet the current MWO requirements because there is no monitoring done by the estate management to ensure that MWO 2022 requirement is comply by the contractors.					
Corrective Actions:	<p>Sustainability Dept. will conduct a refresh briefing regarding MWO 2022 requirement to the estate management so that the monitoring will be done in monthly basis without any misses.</p> <p>Estate will conduct briefing on MWO 2022 requirement to all contractors. All contractors will be advised to top up their workers salary if their have full working days for the month.</p> <p>The CC will monitor this compliance in monthly basis and ensure the contractor to top up their workers salary if their have full working days for the month.</p> <p>Sustainability Dept. will monitor this compliance during each follow up visit and in the next MSPO Internal audit.</p>					
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the raised minor nonconformity, based on the root cause identified were reviewed and deemed to be appropriate. Thus, the effectiveness of the CAP will be verified during the next surveillance assessment.					

Non-Conformity Report			
NCR Ref #:	2357551-202306-N2	Issue Date:	15/06/2023
Due Date:	Next Surveillance Assessment	Date of Closure:	“Open”
Area/Process:	Genting Jambongan Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.6.1.1 Minor
Requirements:	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.		
Statement of Nonconformity:	The SOP for Water Sampling and Analysis was not effectively implemented.		
Objective Evidence:	Based on the Genting Plantations Berhad Sustainability Management Procedure Manual – Water Sampling and Analysis; Doc Number SMP-GPB-15; Issued Date: Jan 2023; 5.2 Management plan/action plan shall be prepared, implemented & monitored when any abnormal results are observed. Based on the Surface Water		

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	Quality Report carried out on 31/01/2023 which indicates (DO) did not comply with Class III of NWQSM, there were no evidence that an action plan has been prepared, implemented, or monitored. Hence a Minor Non-Conformity was raised.
Corrections:	Estate will come out with action plan for the abnormal water analysis result for Dissolved Oxygen (DO).
Root cause analysis:	The water analysis result in the Environment Compliance Report (ECR) monitoring was not review by the estate management upon receiving the full report.
Corrective Actions:	Sustainability Department will brief and guide estate in reviewing the water analysis result from the ECR and come out with action plan should it be needed. The Sustainability Co-ordinator will monitor this compliance when New ECR report is available and ensure action is plan and taken if an abnormal result is detected in the water analysis sampling result. Sustainability Department will monitor this compliance during each follow up visit and in the next MSPO Internal audit.
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the raised minor nonconformity, based on the root cause identified were reviewed and deemed to be appropriate. Thus, the effectiveness of the CAP will be verified during the next surveillance assessment.

Opportunity For Improvement			
Ref:	-	Clause:	-
Area/Process:	-		
Objective Evidence:	-		

Noteworthy Positive Comments	
1	Excellent Housekeeping at Genting Jambongan Oil Mill and Estate.
2	Good document retrieval.
3	Generally good application of GAP and Agronomic Practices at all estates.
4	Good implementation of Company's Procedures.
5	Generally good understanding on OSH and Environmental Conservations by workers and stakeholders.

3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
NCR Ref #:	2214234-202206-M1	Issue Date:	22/06/2022
Due Date:	19/09/2022	Date of Closure:	19/09/2022
Area/Process:	Genting Jambongan Oil Mill	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.5.1.1 Major
Requirements:	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.		

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Statement of Nonconformity:	An environmental management plan in line with the relevant environmental laws established, was ineffectively implemented.
Objective Evidence:	Evidence of implementation on compliance to legal requirements for: <ol style="list-style-type: none"> 1. There was no Written Notification made to Department of Environment under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 for one unit of Fume Cupboard located in Laboratory of Genting Jambongan POM. 2. Genting Jambongan POM has not appointed any Competent Person for Scheduled Waste Management (CepSWAM) as required by License No. 005264, valid from 01/07/21-30/06/22. 3. Environmental Audit as required by License No. 005264 valid from 01/07/21-30/06/22 (No. 21. to be conducted 2 times a year). Currently only conducted once conducted as Environmental Audit Report dated 21/04/22.
Corrections:	<ol style="list-style-type: none"> 1. As the submission requires professional endorsement on the design, GJOM will proceed to obtain quotation and approval on the submission. 2. The current Acting Mill Manager will be registered for CePSWaM course in this year 2022. Scheduled class is available in October 2022. 3. Proceed with approval after obtaining another quotation and proceed to engage The Best Solution as our third-party auditor.
Root cause analysis:	<ol style="list-style-type: none"> 1. The requirement for Fume Hood Notification to DOE not complied due to the requirement was not stated at the mill Legal Register. The mill PIC also not checking the requirements with DOE. 2. Since the previous Mill Manager is transferred to other OU, there is no competent person for CePSWaM in this mill. 3. Late in obtaining another quotation besides R & K consultancy as company required minimum 2 quotations.
Corrective Actions:	<ol style="list-style-type: none"> 1. To update the LRR by add in requirement for Fume Hood Notification to DOE. 2. In future, mill will proceed to register a PIC for CePSWaM if the current active PIC is transferred to other OU or replaced. 3. To prepare schedule for the Environmental Audit as monitoring tools together with other environmental compliance requirements.
Assessment Conclusion:	<p>CAP has been accepted with evidence verified as following:</p> <ol style="list-style-type: none"> 1. Request Unbudgeted Capex Approval; Ref. GENP/Processing/Evaluation – To purchase 1-unit Fume Hood for Laboratory; Date: 25/07/2022 for Quotations by Dynakey Laboratories Sdn. Bhd.; Ref. DL/SDK/0622/125; Date: 22/6/2022 and by Maju Perkasa Sdn. Bhd.; Ref. MP3025_2205QTN; Date: 11/6/2022. 2. Competent Environmental Personnel of Scheduled Waste Management (CePSWAM) training enrolment for Mr. Yee Chee Fui, Acting Mill Manager; Date: 10-14/10/2022; Training provider: Airwastewater Management Sdn. Bhd. 3. Submission form prepared for Notification to DOE for Fume Hood on date upon completion of Lab Fume Hood installation. 4. Updated GJOM List of Licenses, Written Approvals and Permits, Competency & Legal Monitoring; Date: 11/8/2022 with evaluation of compliance monitoring. 5. Appointment of The Best Solution Management Sdn. Bhd. as consultant for Environmental Compliance Audit Service as per quotation ref. SB2022/QUO/023; Date: 17/2/2022.

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	<p>The evidence of corrections and corrective actions were found to be effective to address the non-conformity. Hence, Major NC is closed on 19/09/2022. Continuous effective implementation of the corrective action shall be verified in the next assessment visit.</p>
Verification Statement:	<ol style="list-style-type: none"> 1. The Environmental Plan have been established in line with the current and applicable legal requirements. Sampled the action plan stated in the environmental management plan has been effectively implemented. 2. The LRR has been updated with recent applicable legal requirements. The register is reviewed regularly and updated as and when there are new or amended legal requirements that are applicable to the mill operations. 3. As verified during the visit to the Mill Laboratory, the fume hood has been successfully installed. Dynakey Laboratory Sdn Bhd has conducted the Examination, Inspection and Testing of Local Exhaust Ventilation System dated 17/05/2023 and the report was available for verification. The Written Notification to Department of Environment under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 is currently in progress. 4. Competent Person - Certified Environmental Professional in Scheduled Waste Management (CePSWAM) has been awarded to Mr. Yee Chee Fui, Acting Mill Manager for successfully undergoing the training by Institute Alam Sekitar Malaysia, Jabatan Alam Sekitar (Validity: 16/06/2023 – 15/06/2024). The certificate was available for verification. 5. Environmental Audit has been conducted twice for each license period. Sighted the Environmental Audit Report dated 14/05/2023 and 14/12/2022 for the license period July 2022 – June 2023. <p>The established corrective action plans have been verified and confirmed that the continuous implementation of the corrective actions has ensured that the critical non-conformity was addressed adequately. Thus, the critical non-conformity remains closed.</p>

Non-Conformity Report			
NCR Ref #:	2214234-202206-M2	Issue Date:	22/06/2022
Due Date:	19/09/2022	Date of Closure:	19/09/2022
Area/Process:	Genting Jambongan Oil Mill	Clause & Category: (Major / Minor)	MSP0 2530 Part 4: 4.6.1.1 Major
Requirements:	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.		
Statement of Nonconformity:	Standard Operating Procedures at Diesel Tank and Workshop were not effectively implemented.		
Objective Evidence:	<p>Diesel was stored in the drinking water bottle. During site visit at Diesel Tank, it was found 1 unit of empty drinking water bottle were stored with diesel oil. It was not in line with SOP Handling on Chemicals and Oils with reference No: GJOM-SOP-STO-02 dated 01/05/2014 Section 3.6 "Gunakan Bekas yang sesuai yang dilabel digunakan jika hendak mengambil bahan kimia/minyak"</p> <p>During site visit at workshop area, it was found flash back arrestor was install only for Acetylene but not at Oxy gas tank. It was against SOP Kerja Penggunaan Oxy –</p>		

	Acetylene with reference No: GJOM-SOP-MNT-03 dated 25/10/2016 Section 2.2 (e) Pastikan "Flash Back Arrestor telah dipasang dan ianya berfungsi dengan baik".
Corrections:	<ol style="list-style-type: none"> The use of drinking water bottle for diesel storage will be stop immediately. Immediately install a Flash Back Arrestor on the said Acetylene Tank.
Root cause analysis:	There is no monitoring done by the Mill management on SOP requirements.
Corrective Actions:	<ol style="list-style-type: none"> Re-briefing to all the workers on both of the SOP's. This briefing will be done, defaulted every 6 months as per stated in the Mill annual training program. Mill will provide a dedicated diesel gallon and workers will be brief to use the dedicated diesel gallon for small amount of diesel transit within the mill premises. Workshop personnel will be brief regarding Flash Back Arrestor must be installed on both Acetylene and Oxygen Tank before putting to used.
Assessment Conclusion:	<ol style="list-style-type: none"> CAP has been accepted with evidence verified as following: Replacement of all unauthorized water bottle for diesel storage with diesel gallon container for small amount of diesel transit use. Installation of flashback arrestor of acetylene tank upon received of purchase dated on 23/8/2022 Re-briefing to store attendant on Handling of Chemicals and Oils SOP (GJOM-SOP-STO-02) on 23/8/2022 by mill management and sustainability team. Re-briefing to all mill workshop personnel on Oxy-Acetylene Usage SOP (GJOM-SOP-MNT-03) on 23/8/2022 by mill management and sustainability team. <p>The evidence of corrections and corrective actions were found to be effective to address the non-conformity. Hence, Major NC is closed on 19/09/2022. Continuous effective implementation of the corrective action shall be verified in the next assessment visit.</p>
Verification Statement:	During the visit to Genting Jambongan Oil Mill's workshop and diesel tank. It was noticed that diesel and other fossil fuels were stored in well labelled appropriate containers. The Flashback arrestors were available at all oxygen and acetylene tanks. Interview with the workshop attendance indicated they are aware and have been trained on the SOPs of the workshop and diesel tanks. Therefore, the major non-conformity remains closed.

Non-Conformity Report			
NCR Ref #:	2214234-202206-M3	Issue Date:	22/06/2022
Due Date:	19/09/2022	Date of Closure:	19/09/2022
Area/Process:	Genting Jambongan Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3:4.4.4.2(d) Major
Requirements:	<p>The occupational safety and health plan shall cover the following:</p> <p>d. The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p>		
Statement of Nonconformity:	HIRARC risk control was not accordance to Standard Operating Procedure and PPE usage at manuring area was not effectively implemented.		

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<p>Objective Evidence:</p>	<p>Document verification found that HIRARC for Workshop dated 08/02/2018 – Cutting and Bending Machine stated on Risk Control – SOP, Training and PPE (Goggle, Nitrile Glove, Wellington Boots, Approved Respirator and Apron) however it was not in line SOP Revision 3 dated 11/10/2013, “Langkah-Langkah Perlu Di Patuhi Di Bengkel” section 2.0 PPE - "Leather Gloves, Safety Boots"</p> <p>During site visit at Block 45, Manuring application were conducted by 13 female workers. Fertilizer type was Mixture NK Mix. Based on site verification found PPE used were Nitrile Gloves, Apron, and Shoes however none of them were wear chemical goggles for eye protection as required by Safety Data Sheet Mixture NK 10.5-30 section 8.2, SOP Revision 3 dated 11/10/2013 section 2.0 (Langkah-Langkah Penaburan Baja – PPE) and HIRARC Manual Fertilizer Application dated 08/02/2018.</p>
<p>Corrections:</p>	<ol style="list-style-type: none"> 1. The HIRARC for cutting and bending machine will be review against the SOP so that both will be parallel. 2. The manuring gang will be provided with the chemical goggle and will be re-training on usage of PPE in manuring application as per the SOP, HIRARC and SDS.
<p>Root cause analysis:</p>	<ol style="list-style-type: none"> 1. The HIRARC for cutting and bending machine was not properly reviewed. 2. PPE training given to manuring gang was not effective.
<p>Corrective Actions:</p>	<ol style="list-style-type: none"> 1. A review will be done to the SOP once there is a significant change of risk in the HIRARC. 2. Field supervisor and head gang will be making sure each manuring worker will be fully equipped with PPE as per SOP, HIRARC and SDS before start work.
<p>Assessment Conclusion:</p>	<p>CAP has been accepted with evidence verified as following:</p> <ol style="list-style-type: none"> 1. Records of HIRARC review for cutting and bending machine dated on 12/8/2022. 2. Records of relevant PPE issuance to all manuring gang workers dated on 16/8/2022. 3. Re-briefing all manuring gang workers on SOP and HIRARC for Manual Fertilizer Application by estate management and sustainability team dated on 17/8/2022. 4. Records of daily PPE monitoring of all manuring gang workers latest dated on 17/8/2022. <p>The evidence of corrections and corrective actions were found to be effective to address the non-conformity. Hence, Major NC is closed on 19/09/2022. Continuous effective implementation of the corrective action shall be verified in the next assessment visit.</p>
<p>Verification Statement:</p>	<ol style="list-style-type: none"> 1. HIRARC for workshop – cutting and bending was available for verification. Appropriate PPEs that need to be used have been identified and listed under Current Controls. During the field visit to the Genting Jambongan Estate – Workshop, it was sighted that workers were wearing all appropriate PPEs, in accordance with the HIRARC. Interview with the sampled workers indicated that they have been trained by the management on the HIRARC and the importance of wearing the appropriate PPEs during operation. 2. During the field visit to the Genting Jambongan Estate – Manuring team, it was sighted that workers were wearing all appropriate PPEs, including safety goggles in accordance with the HIRARC for manuring. Interview with the sampled workers indicated that they have been trained by the management on

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	<p>the HIRARC and the importance of wearing the appropriate PPEs during manuring operation.</p> <p>Therefore, the major non-conformity remains closed.</p>
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Non-Conformity Report																											
NCR Ref #:	2214234-202206-N1	Issue Date:	22/06/2022																								
Due Date:	15/06/2023	Date of Closure:	Closed on 15/06/2023																								
Area/Process:	Genting Jambongan Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.5.11 Minor																								
Requirements:	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.																										
Statement of Nonconformity:	The frequency of analysis of the treated water was not carried out according to the procedure.																										
Objective Evidence:	The treated water analysis for the labour quarters at Block 4, Jambongan Estate was only carried out twice in 2021 [report ref.: #W210225/10 (dated 25/02/2021) and #W211111/01B (dated 11/11/2021)]. This is not in compliance with Clause 4.3 of the GPB's SMPM Water Sampling and Analysis (doc. no.: SMP-GPB-15, rev. 01, dated 12/11/2014) which requires the analysis to be carried out on a quarterly basis.																										
Corrections:	Estate will conduct the drinking water analysis on quarterly basis as per SMPM.																										
Root cause analysis:	There is no monitoring done by the estate management on the requirements.																										
Corrective Actions:	Monitoring will be done based on sustainability annual programme plan which is samples for water source will be twice a year and sample for treated water will be every quarterly. This scheduled will be covering all water treatment that available in the estate.																										
Assessment Conclusion:	CAP has been accepted. Evidence of accepted CAP implementation will be verified its effectiveness during next assessment.																										
Verification Statement:	<p>Monitoring of drinking water analysis has been conducted on quarterly basis as per plan. Analysis was conducted by appointed lab DYNAKEY Laboratories Sdn Bhd. Refer details below 2022 and 2023:</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 10px;"> <thead> <tr> <th>Quarter</th> <th>Date</th> <th>Ref. No.</th> <th>Lab Ref. No.</th> </tr> </thead> <tbody> <tr> <td>Q1 2022</td> <td>16/03/2022</td> <td>GJBE/DYK/23/03/020</td> <td>W230316/03</td> </tr> <tr> <td>Q2 2022</td> <td>25/07/2022</td> <td>GJBE/DYK/22/06/035</td> <td>W220630/07</td> </tr> <tr> <td>Q3 2022</td> <td>27/09/2022</td> <td>GJBE/DYK/22/09/011</td> <td>W220907/07</td> </tr> <tr> <td>Q4 2022</td> <td>30/12/2022</td> <td>GJBE/DYK/22/12/020</td> <td>W221215/07</td> </tr> <tr> <td>Q1 2023</td> <td>16/03/2023</td> <td>GJBE/DYK/23/03/020</td> <td>W230316/04</td> </tr> </tbody> </table> <p>The corrective action found implemented accordingly, thus, minor NC was effectively closed on 14/06/2023.</p>			Quarter	Date	Ref. No.	Lab Ref. No.	Q1 2022	16/03/2022	GJBE/DYK/23/03/020	W230316/03	Q2 2022	25/07/2022	GJBE/DYK/22/06/035	W220630/07	Q3 2022	27/09/2022	GJBE/DYK/22/09/011	W220907/07	Q4 2022	30/12/2022	GJBE/DYK/22/12/020	W221215/07	Q1 2023	16/03/2023	GJBE/DYK/23/03/020	W230316/04
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Q1 2023	16/03/2023	GJBE/DYK/23/03/020	W230316/04																								

Non-Conformity Report			
NCR Ref #:	2214234-202206-N2	Issue Date:	22/06/2022

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Due Date:	15/06/2023	Date of Closure:	Escalated to Major																				
Area/Process:	Genting Jambongan Oil Mill	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.4.5.11 Minor																				
Requirements:	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.																						
Statement of Nonconformity:	The frequency of analysis of the treated water was not carried out according to the procedure.																						
Objective Evidence:	The treated water analysis for the mill's labour quarters was only carried out three times in 2021 [report ref.: #W210121/04 (dated 21/01/2021), #W210527/01 (dated 27/05/2021) and #W211028/01 (dated 28/10/2021)]. This is not in compliance with Clause 4.3 of the GPB's SMPM Water Sampling and Analysis (doc. no.: SMP-GPB-15, rev. 01, dated 12/11/2014) which requires the analysis to be carried out on a quarterly basis.																						
Corrections:	Mill will conduct the drinking water analysis on quarterly basis as per SMPM.																						
Root cause analysis:	There is no monitoring done by the mill management on the requirements.																						
Corrective Actions:	Monitoring will be done based on sustainability annual programme plan which is samples for water source will be twice a year and sample for treated water will be every quarterly.																						
Assessment Conclusion:	CAP has been accepted. Evidence of accepted CAP implementation will be verified its effectiveness during next assessment.																						
Verification Statement:	<p>Monitoring of drinking water analysis has been conducted on quarterly basis as per plan. Analysis was conducted by appointed lab DYNAKEY Laboratories Sdn Bhd. Refer details below 2022:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Quarter</th> <th>Date</th> <th>Ref. No.</th> <th>Lab Ref. No.</th> </tr> </thead> <tbody> <tr> <td>Q1 2022</td> <td>22/02/2022</td> <td>GJOM/DYK/22/01/001</td> <td>W220120/01</td> </tr> <tr> <td>Q2 2022</td> <td>28/05/2022</td> <td>GJOM/2022/04/04</td> <td>W220426/03</td> </tr> <tr> <td>Q3 2022</td> <td>23/08/2022</td> <td>GJOM/DYK/22/07/003</td> <td>W220719/01</td> </tr> <tr> <td>Q4 2022</td> <td>07/11/2022</td> <td>GJOM/DYK/22/10/004</td> <td>W221017/01</td> </tr> </tbody> </table> <p>The corrective action for the previously identified issue found implemented accordingly, however, Minor NC was escalated to Major NC due to found other non-conformity in the same indicator.</p>			Quarter	Date	Ref. No.	Lab Ref. No.	Q1 2022	22/02/2022	GJOM/DYK/22/01/001	W220120/01	Q2 2022	28/05/2022	GJOM/2022/04/04	W220426/03	Q3 2022	23/08/2022	GJOM/DYK/22/07/003	W220719/01	Q4 2022	07/11/2022	GJOM/DYK/22/10/004	W221017/01
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Q4 2022	07/11/2022	GJOM/DYK/22/10/004	W221017/01																				

Opportunity For Improvement			
Ref:	2214234-202206-I1	Clause:	MSPO 2530 Part 3: 4.5.3.2
Area/Process:	Genting Jambongan Estate		
Objective Evidence:	Improving the efficiency of resource utilization and recycling of wastes or converting them into value-added by-products for used drum in Jambongan Estate could be improved further.		
Verification Statement:	Genting Jambongan Estate have opted to reuse the drums as rubbish bin at the linesite. The additional bins were then stored and disposed as Scheduled Waste in accordance with the national legal standards. Verified the consignment note (Consignment Note Number: 2022092410AHL52) of disposal of used drums SW 409, disposed on 21/09/2022 via Legenda Bumimas Sdn Bhd amounting to 2.1920 Mt.		

3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
1777443-201904-N1	MSPO Part 4: 4.3.1.1 Minor	16/05/2019	Closed on 28/08/2020
1777443-201904-N2	MSPO Part 4: 4.4.4.2 Minor	16/05/2019	Closed on 28/08/2020
1777443-201904-N3	MSPO Part 3: 4.4.5.6 Minor	16/05/2019	Closed on 28/08/2020
1777443-201904-N4	MSPO Part 3: 4.4.5.11 Minor	16/05/2019	Closed on 28/08/2020
1945766-202002-N1	MSPO Part 3: 4.4.5.4 Minor	28/08/2020	Escalated to Major
1945766-202002-N2	MSPO Part 4: 4.4.5.4 Minor	28/08/2020	Closed on 23/06/2021
2071425-202106-M1	MSPO Part 4: 4.4.4.1 Major	23/06/2021	Closed on 21/09/2021
2071425-202106-M2	MSPO Part 4: 4.4.5.4 Major	23/06/2021	Closed on 21/09/2021
2214234-202206-M1	MSPO Part 4: 4.5.1.1 Major	22/06/2022	Closed on 19/09/2022
2214234-202206-M2	MSPO Part 4: 4.6.1.1 Major	22/06/2022	Closed on 19/09/2022
2214234-202206-M3	MSPO Part 3: 4.4.4.2 (d) Major	22/06/2022	Closed on 19/09/2022
2214234-202206-N1	MSPO Part 3: 4.4.5.11 Minor	22/06/2022	Closed on 15/06/2023
2214234-202206-N2	MSPO Part 4: 4.4.5.11 Minor	22/06/2022	Escalated to Major
2357551-202306-M1	MSPO Part 4: 4.4.5.11 Major	15/06/2023	Closed on 02/08/2023
2357551-202306-N1	MSPO Part 3: 4.4.5.4 (Minor)	15/06/2023	"Open"
2357551-202306-N2	MSPO Part 3: 4.6.1.1 (Minor)	15/06/2023	"Open"

3.5 Issues Raised by Stakeholders

IS #	Description
1	<p>Issues: Worker’s representative, Genting Jambongan POM and Genting Jambongan Estate Siti Hawa Mohd Miasin has been elected as one of the workers representatives at Genting Jambongan POM. While for Genting Jambongan Estate Mr Ferdianus, Ms. Rostina, has been elected. Worker’s representative mentioned that they have been elected through election that has been conducted without interference of the management. He said all workers and staff can join the workers union if available. As per interview, all workers representatives can demonstrate their understanding on their roles and responsibilities and as part of mechanism to workers grievance.</p> <p>As per interview, the workers representative mentioned that during the workers representative meeting last year, they requested for HUMANA inside the estate and has been responded by the management to include in the management plan.</p> <p>Management Responses: As per interview with the management, the request will only proceed once there are a minimum number of kids in the estate.</p> <p>Audit Team Findings: Sighted workers representative minutes meeting documented in document “Mesyuarat Jawatankuasa wakil pekerja pertama 2022” dated 11/08/2022 and there is evidence workers representative for each division and the management responded that the request will be included in the management plan.</p>

<p>2</p>	<p>Issues: MXXXXXX EXXXXXXXXX, Canteen operator 2 canteen operators have been interviewed during the site visit to the canteen which the canteen provide cook food to all staff and workers during the operations time. They said that they have been operating the canteen more than 10 years and tenancy agreement will be renewed annually based on the performance. All food handler has been sent for typhoid vaccine and for food handler course. There is no issues in term of communication with the management where they aware PIC to be contacted if any issues or grievances.</p> <p>Management Responses: The management noted with the respond and will try to improve in the future.</p> <p>Audit Team Findings: No further verification required</p>
<p>3</p>	<p>Issues: Local communities (Muhammad Fekri bin Osin/head village Kampung Bahanan, Barjahun Hujah/head village Kampung Hujung, Jainol bin Mutong/head village Kampung Limau Limau). Head of village for 3 village has been interviewed which Kampung Bahanan, Kampung Hujung and Kampung Limau-limau. Most of the villagers works as fisherman, village works and own their own oil palms farm and with Genting Plantations Berhad. Based on the on the interview, it has been confirmed that good relationships have been between both parties. They also mentioned that there are no operation/ activities in estates and POM that give adverse effect to the local communities. Any vacancies in estate/POM will be posted at notice board and nearby coffee shops at the village area. As per interview, some villagers work in the estate and POM. There are no cases of pollution has happened and identified by the villagers. There are also no issues of land dispute/ customary right land in Genting Jambongan Estate/ POM which has been confirmed by Mr Barjahun who already reside at that area since kids. There are a lot of contribution has been made by the estate/POM to the local communities such as roads repair, supplying water.</p> <p>Management Responses: The management noted with the respond and will try to improve in the future.</p> <p>Audit Team Findings: No further verification required.</p>
<p>4</p>	<p>Issues: Jandah@Hassan bin Kasui, Headmaster SK Malalin SK Malalin is located around 10km from the Genting Jambongan POM and estate and There are no kids who parents working in the Genting Jambongan certification units. The headmaster of S.K Malalin confirm that good relationships has been maintained by both parties where estate has provided contribution in term of manpower and expenses for any school activities. Complaint procedure and consultation procedure has been communicated to them during the stakeholders meeting.</p> <p>Management Responses: The management noted with the respond and will try to improve in the future.</p> <p>Audit Team Findings: No further verification required.</p>
<p>5</p>	<p>Issues: Neighbouring estate, Bahagia Jaya Plantations/ Kho Shek Kein Bahagia Jaya Plantations is neighbouring to Genting Jambongan Estate where all staff/workers are using Genting Jambongan Estate to access around the Jambongan island. There is clear demarcation of boundaries for Bahagia Jaya Plantations with Genting Jambongan Estate. There is no land dispute which both estates have their own legal ownership from Sabah state government. Good relationships have been maintained and issues will be discussed through meeting and phone call. He also aware method/mechanism of communication if there are any issues related to land</p> <p>Management Responses: The management noted with the respond and will try to improve in the future.</p> <p>Audit Team Findings: No further verification required.</p>

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6	<p>Issues: TXXXX SXXXXX EXXXXXXXXXX, FFB transport contractor</p> <p>Based on interview, the contractor agreed good relationship has been established between management and contractors. The contractor also mentioned that the payment paid before 15 days of invoices received as per terms and conditions. Contractor was being briefed regarding RSPO & MSPO during stakeholders meeting. All workers recruited is local workers and SOCSO and EPF contribution made by the contractors itself.</p>
	<p>Management Responses: The management noted with the respond and will try to improve in the future.</p>
	<p>Audit Team Findings: No further verification required.</p>
7	<p>Issues: FFB supplier, Jalaluddin Mizam and Roziah Hariri, smallholders</p> <p>As per interview with FFB supplier, there is evidence FFB pricing has been communicate and explain to all FFB supplier and has been posted at the weighbridge stations. Payment will be paid through bank transaction before 7th every month and there are no issues of payment raised and been paid as per weighbridge tickets. There is deduction will be made for unripe bunches and will be taken back by the FFB supplier. The management of Genting Jambongan Estate also has communicated on certification and will support if there is any technical assistance required.</p>
	<p>Management Responses: The management noted with the respond and will try to improve in the future.</p>
	<p>Audit Team Findings: No further verification required.</p>
8	<p>Issues: Gender committee</p> <p>6 gender representatives for each operating have been interviewed. Based on the interview, there is evidence that all female workers can participate in gender committee and has been invited for meeting that will be conducted every 6 months. As per interview, it has been confirmed that grievance procedure for any harassment has been communicated and all representatives can demonstrate their understanding on the procedure. Other than that, pregnancy test has not been conducted for female workers but only self-assessment on pregnant symptom such as period delay will be submitted online on monthly basis. Representative also has been asked on discrimination and has been confirmed there is no discrimination has been practiced. All female workers received same benefits, leave and others. New mother assessment has been conducted for each operating units and has been confirmed by one of representative which also new mother.</p>
	<p>Management Responses: The management noted with the respond and will try to improve in the future.</p>
	<p>Audit Team Findings: No further verification required.</p>

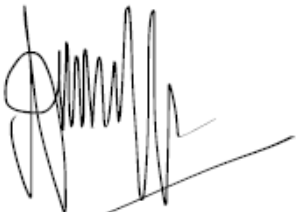


3.6 List of Stakeholders Contacted

<p>Government Officer:</p> <p>1. Jandah@Hassan bin Kasui, Headmaster SK Malalin</p>	<p>Community/neighbouring village:</p> <p>1. Bahagia Jaya Plantations/ Kho Shek Kein</p> <p>2. Muhammad Fekri bin Osin/Village Head Kampung Bahanan</p> <p>3. Barjahun Hujah/Head village Kampung Hujung</p> <p>4. Jainol bin Mutong/Head village Kampung Limau Limau</p>
<p>Suppliers/Contractors/Vendors:</p>	<p>Worker's Representative/Gender Committee:</p>

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<ul style="list-style-type: none"> 1. FFB supplier, Jalaluddin Mizam 2. Roziah Hariri, smallholders 3. TXXXX SXXXXX EXXXXXXXXXX, FFB Transport contractor 4. MXXXXXX EXXXXXXXXXX, Canteen operator 	<ul style="list-style-type: none"> 1. Gender committee 2. Worker’s representative, Genting Jambongan POM and Genting Jambongan Estate
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Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings		
<p>Based on the findings during the assessment Genting Oil Mills (Sabah) Sdn Bhd – Genting Jambongan Oil Mill Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Genting Oil Mills (Sabah) Sdn Bhd – Genting Jambongan Oil Mill Certification Unit is approved and continued.</p>		
Acknowledgement of Assessment Findings	Acknowledgement of Assessment Findings	Report Prepared by
Name: ARUNAN KANDASAMY	Name: JAMES CHUNG KHIM HON	Name: VIJAY KANNA PAKIRISAMY
Company name: GENTING PLANTATIONS BERHAD	Company name: GENTING PLANTATIONS BERHAD	Company name: BSI SERVICES (MALAYSIA) SDN BHD
Title: SVP - PLANTATION (MALAYSIA)	Title: SVP - GROUP PROCESSING	Title: CLIENT MANAGER
Signature:  Date: 14/08/2023	Signature:  Date: 14/08/2023	Signature:  Date: 05/08/2023

Appendix A: Summary of the findings by Principles and Criteria

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	Genting Oil Mills (Sabah) Sdn Bhd have established the policy “Genting Plantations – Sustainability Policy” signed by the Chief Operating Officer, dated 03/08/2009. The implementation of MSPO has been incorporated in the policy.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	Genting Oil Mills (Sabah) Sdn Bhd have established the policy “Genting Plantations – Sustainability Policy” signed by the Chief Operating Officer, dated 03/08/2009. The policy covers commitment to: <ul style="list-style-type: none"> – Ensure that all operations are managed efficiently with the highest possible level of transparency, integrity, and accountability. – Ensure that all operations comply with all applicable legal requirements. – Continue to invest in and develop human capital. – Provide a safe and healthy environment for all employees, contractors, suppliers, and visitors. – Strive to achieve long term economic and financial viability. – Adopt effective and practical best management practices in all operations. – Strive to conserve and protect any valuable natural resources and biodiversity within the landholdings. 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Genting Plantations Berhad has established internal audit procedures documented in Genting Plantations Berhad; Sustainability Management Procedure Manual; Sustainability Internal Audit; Doc Number: SMP-GDB-03; Revision: 07; Issue Date: June 2022. Based on the procedure, the internal audit is to be conducted annually as per Sustainability Internal Audit Procedure. Verified that the mill has conducted the internal audit on a yearly basis. MSPO Internal Audit was conducted on 07 - 08/03/2023 by Sustainability Department at Genting Jambongan Estate. The Internal Audit Report was available for verification.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Genting Plantations Berhad has established internal audit procedures documented in Genting Plantations Berhad; Sustainability Management Procedure Manual; Doc Number: SMP-GDB-03; Revision: 07; Issue Date: June 2022. MSPO Internal Audit was conducted on 07 - 08/03/2023 by Sustainability Department at Genting Jambongan Estate. The Internal Audit Report was available for verification. During the assessment, the internal audit team raised 1 Minor Non-Conformities, and 5 Observation raised in regard to MSPO Standard.	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 acknowledged by Mill Management. Report details as below. MSPO Internal Audit was conducted on 07 - 08/03/2023 by Sustainability Department at Genting Jambongan Estate. The Internal Audit Report was available for verification.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.1.3 – Management Review			
<p>4.1.3.1</p>	<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>- Major compliance -</p>	<p>Genting Plantations Berhad has established SOP for Management Review documented in Genting Plantations Berhad; Sustainability Management Procedure manual; Management Review; Doc Number: SMP-GPB-06; Issue date: September 2020. Based on the SOP established, the frequency for management review needs to be carried out at least once a year.</p> <p>– Management Review Meeting conducted on 29/05/2023 at Genting Jambongan Estate.</p> <p>The agenda discussed during the meeting as follows, among others:</p> <ol style="list-style-type: none"> 1. Status of outstanding issues from previous meetings. 2. Changes, improvement, or modification of the Sustainability management System. 3. Internal and external audit findings on Sustainability Management System. 4. Complaints, grievances and Enquiry Book/Record. 5. Review Continual Improvement status & its recommendations. 6. Review of Sustainability Policy and its objectives status. 7. Compliance status and legal requirements. 8. Preventive and Corrective Actions. 9. Follow up actions from management review. 10. Changes that could affect the management review. 11. Customer feedback. 12. Recommendations for improvement. 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -	Genting Jambangan Estate has established the continuous Improvement plan, documented in the GJE Continuous Improvement Plan dated 06/06/2023. Among the action plan for continuous improvements were: 1. To use alternative pesticides that are safe and less toxic. 2. Monthly pesticide issue record. 3. Planting cover crop at immature fields. Strive to plan and establish cover cop before planting. 4. Increase beneficial plants planting points. 5. Regular monitoring of water quality, soil erosion and HCV. 6. Continue to create awareness on recycling. 7. To hold regular meetings with stakeholders to further enhance the communication and feedback. 8. Carry out interior and exterior painting for workers quarters.	Complied
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. - Major compliance -	This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the Top Management are transacted during the Managers meetings and emails.	Complied
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	Where introduction of new machines and new work method, all level of employees will be trained to handle /implement the new techniques and work changes. Monitoring is made by the Estate Managers and Assistants throughout the on-the-job training and familiarization.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	<p>The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>Management unit has established Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 23/02/2018 for the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties.</p> <p>Meeting shall be carried out at least six monthly and annually for internal and external stakeholders. The topics to be discussed such as complaint & grievances, environmental and biodiversity concerns, social issue and suggestions for improvement.</p> <p>The procedure has been briefed to the internal and external stakeholders. Briefing to the external stakeholders was conducted during the stakeholder meeting conducted on 09/05/2023. Issues raised and actions taken during the stakeholders meeting were well recorded in a management plan and made available for verification.</p>	<p>Complied</p>
4.2.1.2	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>Management unit has established Requests and Responses with Doc. No.: SMP-GPB-25, Rev. 0 dated 14/08/2014 to define the responsibilities to respond constructively and promptly to the information requested by stakeholders.</p> <p>Based on the procedure, the list of documents which are publicly available as follows:</p> <ol style="list-style-type: none"> 1. Company annual report 2. Group policies 3. Reports related to environment such as EIA, EAI 	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		4. RSPO external audit reports 5. Pollution prevention plan 6. Continuous improvement plan 7. Complaints and grievances book and its procedure 8. Negotiation and compensation procedure 9. Sexual harassment procedure Management unit has issued the list of documents that could be requested by the stakeholders to all the relevant stakeholders of the mill. The stakeholders are required to register in Enquiry Register Book prior to access to the documents. The list of documents not limited to: 1. Land title 2. Policies 3. Reports – EAI, SIA, HCV, and audit reports 4. Management plans 5. Procedures The stakeholders were briefed on the request and response during the stakeholder meeting conducted on 11/05/2023.	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	Management unit has established Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 23/02/2018 for the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties. Meeting shall be carried out at least six monthly and annually for internal and external stakeholders. The topics to be discussed such as complaint &	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		grievances, environmental and biodiversity concerns, social issue, and suggestions for improvement.	
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance -	The estate Manager has been appointed by Senior Manager Operations to be the representative for ISCC, RSPO and MSPO related matters. Appointment letter dated 15/02/2023 was made available for verification.	Complied
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	Refer Stakeholders List dated 26/05/2023. The stakeholders such as contractors, suppliers, local communities, and government authorities were included into the list. A combined stakeholder meeting was conducted on 11/05/2023 in Genting Jambongan Estate. Stakeholders such as local communities, local authorities, contractors, and suppliers were invited and attended the meeting. Seen the meeting minutes and requests from the stakeholders were recorded in the minutes.	Complied
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance -	Genting Plantations Berhad has established the documented SOP on Traceability in the Genting plantations Berhad Sustainability Management Procedure Manual – Traceability (Estate); Document Number: SMP-GPB-09; Revision: 07; Issue Date: Jan 2023. Genting Jambongan Estate sends their FFB to Genting Jambongan Oil Mill. Weighbridge tickets were available for verification and maintained for traceability of all FFBs sent to the mill. Weighbridge tickets were sampled for the estate.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Inspection on the compliance of the traceability system were made on daily basis. The estate management monitors the harvesting process where the FFB are collected from the platforms in the estate and	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		transported to the mill. Sighted the weighbridge records and FFB delivery notes for FFB sent to the mill. The Sustainability Department – Sustainability Internal Audit conducted on a yearly basis to monitor compliance towards traceability at the mill. Verified the latest MSPO Internal Audit Report dated 07 - 08/03/2023.	
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	Genting Jambongan Estate has appointed the Clerk of Genting Jambongan Estate as the Person In-Charge for Traceability requirements of RSPO, ISCC and MSPO Sustainability Standards, dated 04/01/2023, undersigned by the Manager - GJBE.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	Delivery of FFB from Genting Jambongan Estate from field to Genting Jambongan Oil Mill was monitored closely by the estate management. Sighted the records of delivery or transportation of FFB. These records are maintained, and the documents are kept by the estate and mill. Sampled FFB Despatch Advice produced by the estate to monitor the traceability of FFB to the mill, Sample as below. 1. From: Genting Jambongan Estate 2. Date: 31/05/2023 3. Product: FFB 4. Ticket no: A 017489 5. Nett Weight: 4.40 Mt 6. Vehicle no: LD20 - 22	Complied
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			

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Criterion / Indicator		Assessment Findings	Compliance
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	Genting Jambangan Estate continues to demonstrate their commitment towards compliance with legal requirements. Among the evidence of compliance verified were: <ol style="list-style-type: none"> 1. MPOB License; License Number: 509406502000; License Validity Period: 01/12/2022 – 30/11/2023. 2. Permit for Controlled Items (Diesel); License Number: PPDBKK.SDK.09/2005 (SK); Serial Number: S 003513; License Validity Period: 09/06/2021 – 08/06/2024. 3. Permit for Controlled Items (Petrol); License Number KPDNHEP.SDK.68/2021(PK); Serial Number: PK S00646; License Validity Period: 21/09/2022 – 20/09/2023. 4. License to Employ Non-Residential Workers; License Number: JTK.H.SDK.600-4/1/1/01261/005606; License Validity Period: 14/09/2022 – 01/10/2023 	Complied
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	Genting Plantations Berhad have established Genting Plantations Berhad Sustainability Management Procedure Manual – Legal Requirement Register (LRR); Doc Number: SMP-GPB-22' Revision: 11; Issue Date: Jan 2023. All legal requirements were documented in Legal Requirement Register available at the estate. The register is reviewed regularly and updated as and when there are new or amended legal requirements that are applicable to the estate operations.	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	All legal requirements were documented in Legal Requirement Register available at the estate. The register is reviewed regularly and updated as and when there are new or amended legal requirements that are applicable to the estate operations.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.</p> <p>On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Tracking system on any changes in the law is well implemented.</p> <p>Genting Jambongan Estate have appointed the Acting Chief Clerk as the PIC for Updating Changes in laws at Genting Jambongan Estate as stated in the appointment letter dated 03/05/2022, undersigned by the Estate Manager.</p>	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>The estate activities do not diminish the land use rights of other users. Refer Genting Jambongan Estate, Title No. Country Lease 08XXXXXXX. The land is belonging to Genting Oil Mills (Sabah) Sdn Bhd. Sighted the copy of the land title. There is no issue on land use claims evidence during the audit. Interviewed with the local communities confirmed that no land encroachment or land dispute reported.</p>	Complied
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p>- Major compliance -</p>	<p>The estate has 597 land titles, and they were summarised in a list which has the information about title no., area size (in Ac and Ha), lease period, and term of use. Copies of the titles were made available for verification. Based on the land titles, the total area is 4,602.30 Ha.</p>	Complied
4.3.2.3	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	<p>Legal perimeter boundary has been maintained by the management. During the site visit to Block 45 – Division and Block 19 – Division 3 of Genting Jambongan Estate, it was verified that there were boundary packs (Red Poled) available along the perimeter boundary. There was</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		no evidence of plantings beyond the perimeter boundary as verified during the site visit.	
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute in the estate at the time of audit. This has been verified through interview with the local community. The land belongs to Genting Oil Mills (Sabah) Sdn Bhd and land ownership documents were verified.	NA
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land or negotiated agreements within the Genting Jambongan Estate land area.	NA
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. - Minor compliance -	There is no customary land or negotiated agreements within the Genting Jambongan Estate land area.	NA
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There is no customary land or negotiated agreements within the Genting Jambongan Estate land area.	NA
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			

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Criterion / Indicator		Assessment Findings	Compliance
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance –	Social Impact Assessment (SIA) & Human Rights Impact Assessment (HRIM) Report was reviewed in April 2021 for both Genting Jambongan Oil Mill and Genting Jambongan Estate by Sustainability Department. The assessment has involved relevant stakeholders such as schools' representatives, local authorities, and workers. No negative impact was identified during the assessment through interview. Social Management and Monitoring Plan of Genting Jambongan Mill was reviewed and last updated on 26/05/2023.	Complied
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	Management unit has established Complaints and Grievances procedure with Doc. No.: SMP-GPB-19, Rev. 05 dated 13/05/2022 to provide guidelines on handling complaints & grievances involved internal and external stakeholders. All the written confidential complaints shall be dealt by Manager. The timeframe for the action to be taken depends on seriousness of the complaints or grievance. The accepted timeframe to acknowledge and respond to the complaint or grievances is within 1 month upon receipt.	Complied
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	The mill has implemented Complaints/ Grievances Record Book to record any complaint or grievance received. Most of the complaints were of road conditions by the local communities and maintenance of housing facilities. Based on verification of the complaints/grievance records, all the issues were resolved in appropriate manner. Sample of complaint record as below: 1. Complainant: Rostina, Date: 12/03/2023, Issue: Fan was faulty, Issue has been solved on 14/03/2023 and initialed by the complainant.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		2. Complainant: Rosmiati, Date: 11/08/2022, Issue: Request for window glass replacement, Issue has been solved on 11/08/2023 and initialed by the complainant.	
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	A complaint form was available at the premises. The Complaints/Grievances Record Book serves as complaint forms and made available in the office. Apart from that, complaints can also be lodged through a complaint box which was available at the labour quarters and security post. Interview with the workers and stakeholders confirmed that they are aware of both mechanisms.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	Employees and stakeholders were aware on the complaint's procedure. Training and briefing were given to them on 11/05/2023 during the stakeholder meeting. Interviewed with the external stakeholders confirmed that they are aware of the complaint procedure.	Complied
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	Compliant record for the past 24 month was kept by the management unit. The document was available for affected stakeholders upon request. Records of complaint or grievance for June 2020 were available for review during the audit.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	Management unit was located in an island and surrounded by several villages. The company and the local community, including schools, have established good relationship between them ever since the setup of the estate in the island. Among the contributions provided by the company are road maintenance, distribution of clean water to local communities, and monetary donations to the schools. The existence of the company has also provided a good job opportunity to the locals	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>and many of them are currently working for the company. Latest sample of CSR was:</p> <ol style="list-style-type: none"> 1. Water supply to village (Kampung Tanjung Batu) dated 08/03/2023. 2. Backhoe assist to Kampung Bahanan dated 22/05/2023. 3. Road repair at SK Jambongan dated 07/06/2023. 	
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Genting Plantations Berhad have established the "<i>Dasar Keselamatan Dan Kesehatan Pekerjaan</i>" (Occupational Safety and Health Policy) signed by the President and CEO dated 01/07/2018. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the estate. Latest policy briefing dated 12/02/2023 was verified.</p> <p>The Sustainability Department team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition.</p> <p>The estate has established Safety and Health Management Plan 2023. The management plan includes the ESH Risk Management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring, Health monitoring.</p>	Complied
4.4.4.2	<p>The occupational safety and health plan shall cover the following:</p> <ol style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. 	<p>The occupational safety and health plan cover the following:</p> <ol style="list-style-type: none"> a. Genting Plantations Berhad have established the "<i>Dasar Keselamatan Dan Kesehatan Pekerjaan</i>" (Occupational Safety and Health Policy) signed by the President and CEO dated 01/07/2018. The policy has been communicated to the staffs and workers through induction training for new workers, morning briefing and 	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the 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>displayed at various notice boards within the estate. The policy has been briefed to all workers on 09/05/2023.</p> <p>b. Genting Plantations Berhad have established Standard Operating Procedure documented in Genting Plantations Berhad Sustainability Management Procedure Manual – Risk Management and Risk Assessment; Doc Number: SMP-GPB-08; Revision: 00; Issue Date: 11/10/2013. Genting Jambongan Estate have conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment covers all main operations and support operations. Among the activities verified in the HIRARC were, among others, Genset, Landscaping, Chainsaw, Loading FFB (Grabber) rat baiting, excavator works, etc. HIRARC is reviewed on annually and as and when there are any accidents that occur in the estate.</p> <p>Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate.</p> <ul style="list-style-type: none"> – The Chemical Health Risk Assessment Report (Report Number: JKPP HQ/07/ASS/00/236-2019/157) conducted by QMSPRO Sdn Bhd in October 2019 was available for verification. A supplementary CHRA Report was available dated February 2021 for changes in chemical used in the estate (Report number: JKPP HQ/03/ASS/00/154-2021/034). 	

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Criterion / Indicator	Assessment Findings	Compliance
<p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>Medical Surveillance was not necessary as the estate does not use organophosphate in its operations. Nevertheless, the estate conducted regular health Checkup for its chemical handlers.</p> <ul style="list-style-type: none"> - The health checkup was conducted to monitor the level of exposure on the workers towards the chemicals and fumes. Verified the latest health checkup for the month of May conducted for all exposed workers. Results indicated all but 1 worker were fit to work. The one worker was declared unfit due to being pregnant and has been transferred to non-chemical related works. Records were available for verification. <p>Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the estates.</p> <ul style="list-style-type: none"> - The Initial Noise Risk Assessment was conducted on 19 – 24/06/2021 by Chemclass Sdn Bhd. The assessment report (Ref. No: CC/0621/061) was available for verification. <p>Audiometric Test was done for workers exposed to excess noise at the workplace in compliance with the Noise Risk Assessment.</p> <p>Audiometric Test was conducted on 14/03/2023 for total 32 workers by DAB OH Sdn Bhd and the Audiometric Report was available for verification. The report stated that there were 29 workers with normal hearing, 2 workers with abnormal results, to be examined by OHD and 1 worker with STS, to be conducted retest within 3 months. The retest was conducted on 05/04/2023.</p> <p>c. The estate management has established a training program for employees exposed to chemicals used at the estate to ensure continuous awareness to the employees. The training was</p>	

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	<p>conducted by the Manager, Asst. Manager, and representative from the chemical suppliers to the supervisors and operators. Sighted the training records as follows:</p> <ul style="list-style-type: none"> • Chemical Safety, PPE, Calibration, Premixing and Triple Rinse Training on 06/06/2023 conducted by Ancom Crop Care Sdn Bhd. • Sprayer and Buffer Zone Training conducted on 09/05/2023 • Sprayer and Spraying Re-entry period Training conducted on 24/05/2023. <p>d. The estate has provided appropriate PPE to all workers according to the job type and requirements. All PPE were provided in accordance with the risk assessment and recommendations as per legal documents such as CHRA, NRA and SDS. All PPEs are provided free of charge by the management to the workers.</p> <p>Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>e. Standard Operating Procedures for Handling of Chemicals were available in several documents such as:</p> <ul style="list-style-type: none"> - Genting Plantations Berhad – Keselamatan Dan Kesihatan Pekerjaan; Prosedur Kerja Selamat – Menyembur Racun; Document Number: GENP/SOP/00/002; Date Issued: 11/10/2022. - Genting Plantations Berhad – Keselamatan Dan Kesihatan Pekerjaan; Prosedur Kerja Selamat – Membancuh Racun; Document Number: GENP/SOP/01/003; Date Issued: 11/10/2022. 	

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	<p>f. Estate management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate Manager. The Estate Manager was appointed to be the Chairman of OSH Committee at the mill as stated in the appointment letter dated 03/01/2022 undersigned by the General Manager (R2).</p> <p>g. The management conducted regular OSH committee meetings on quarterly basis and when necessary due to accidents that occur. The meeting discussed issues on employees' safety, health, and welfare such as operational risks and health achievement report, estate security, safety compliance by contractors, workplace inspection, legal compliance, safety and health training.</p> <p>Sighted the OSH Meeting Minutes dated 12/05/2023 (02/2023), 10/02/2023 (01/2023), 12/08/2022 (03/2022) and 11/11/2022 (04/2022).</p> <p>h. Accident and Emergency procedures were available in the Genting Plantations Berhad – Manual Keselamatan Dan Kesihatan Pekerjaan; Emergency Response Procedure; Document Number: OM-GPB-04; Issue Date: 01/01/2010. The estate has established Emergency Response Team lead by the Estate Manager. The "Carta Organisasi Ahli Jawatankuasa Pasukan Tindakan Kecemasan (ERT) – GJE" was available for verification. Emergency Response Plans were available for incidents such as pesticides spillages, Fire, Explosions, Diesel Spillage and Accidents. The ERT chart and Fire Extinguisher Map was also available and verified.</p> <p>Emergency Response Training was conducted as below:</p> <ul style="list-style-type: none"> – Fire Extinguisher Training – 07/02/2023 	

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		<p>i. First aiders were assigned to various workstation at the estate. The supervisors and staffs were responsible for first aid boxes at each workstation assigned to them by the management. The first aid box was recently replenished with all stated items available in the box. First Aid trainings were conducted regularly at the estate and documents of trainings were verified as below:</p> <ul style="list-style-type: none"> - First Aid and First Aid Box Training was conducted on 05/05/2023. <p>j. The estate recorded all accidents reports and reported to HQ using the GJE – Accident Statistic Report Monthly update form. The accident occurred was reviewed on quarterly basis during OSH committee meeting.</p> <p>There were 2 accident (4 Days LTA) case for the year 2022 reported in the estate. The JKPP 8 form has been submitted to DOSH for the year ending 2022 on 06/01/2023 and documents available for verification. For the year 2023 there were no accident cases reported as of to date.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees. - Major compliance -	Management unit has established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company respect human rights and support international human rights law. Briefing of the policy was conducted on 16/02/2023 to the workers during morning muster. Seen the training attendance list.	Complied
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion,	Management unit has established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company shall not discriminate in terms of hiring, compensation, access to training,	Complied

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	nationality, social origin or any other distinguishing characteristics. - Major compliance -	promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.	
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	There were employment contracts for staffs and workers. Pay and conditions are documented and achieved the Minimum Wage Order 2022. Sampled of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Sabah Ordinance which have been signed by the worker. Sample of contact agreement and payslip (Month of Sept 2022, Nov 2022, and Mar 2023) was verified as below: <ol style="list-style-type: none"> 1. Employee No: E18106 2. Employee No: E18042 3. Employee No: E18042 4. Employee No: E00121 5. Employee No: E01515 6. Employee No: E01520 7. Employee No: E01515 8. Employee No: E18199 	Complied
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance -	The management has ensured the employees of the contractors were paid based on legal and employment agreement through obtaining the pay slips of the employees on monthly basis. Among the elements checked by the management are wages, EPF and SOCSO. Sample of contractor agreement, contract agreement of workers and payslip month of Mar 2023 and May 2023 were verified as below: <ol style="list-style-type: none"> 1. Contractor; SXXXXXXX CX, Type of work: FFB Transport dated 01/01/2023 with reference number: GJBE/FFB/23/01/01. 	Minor Nonconformity

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Criterion / Indicator		Assessment Findings	Compliance																								
		<p>Workers: Passport No: AU411XXX</p> <p>2. Contractor; PXXXXXXXXXX YXX KXXX, Type of work: FFB Transport dated 01/01/2023 with reference number: GJBE/FFB/23/01/03.</p> <p>Workers: NRIC: 770511-XX-XXXX</p> <p>The EPF and SOCSO were also correctly contributed according to the legal requirements.</p> <p>Nevertheless, the wages paid to contractor worker was not according with Minimum Wages Order 2022.</p> <p>Based on record verification for contractor workers for SXXXXXX CX. workers with passport AU411XXX found not paid with minimum wages salary (rate per day RM57.69). Evidence as below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Month</th> <th>Working days</th> <th>Wages, RM</th> <th>Rate/Day, RM</th> <th>Wages as per Rate RM 57.69/day</th> <th>Diff, RM</th> </tr> </thead> <tbody> <tr> <td>Jan 2023</td> <td>26</td> <td>1300.58</td> <td>50.02</td> <td>1499.94</td> <td>-199.36</td> </tr> <tr> <td>Feb 2023</td> <td>25</td> <td>1349.97</td> <td>51.92</td> <td>1442.25</td> <td>-92.28</td> </tr> <tr> <td>Apr 2023</td> <td>27</td> <td>1314.82</td> <td>50.57</td> <td>1557.63</td> <td>-242.81</td> </tr> </tbody> </table>	Month	Working days	Wages, RM	Rate/Day, RM	Wages as per Rate RM 57.69/day	Diff, RM	Jan 2023	26	1300.58	50.02	1499.94	-199.36	Feb 2023	25	1349.97	51.92	1442.25	-92.28	Apr 2023	27	1314.82	50.57	1557.63	-242.81	
Month	Working days	Wages, RM	Rate/Day, RM	Wages as per Rate RM 57.69/day	Diff, RM																						
Jan 2023	26	1300.58	50.02	1499.94	-199.36																						
Feb 2023	25	1349.97	51.92	1442.25	-92.28																						
Apr 2023	27	1314.82	50.57	1557.63	-242.81																						
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The estate has key in the personal biodata into Lintramax Plantation Director system to record of full name, employee no., date joined, gender, date of birth and type of work were clearly stated in the list. Sample of contact agreement and payslip (Month of Sept 2022, Nov 2022, and Mar 2023) was verified as below:</p> <ol style="list-style-type: none"> 1. Employee No: E18106 2. Employee No: E18042 3. Employee No: E18042 	Complied																								

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Criterion / Indicator		Assessment Findings	Compliance
		4. Employee No: E00121 5. Employee No: E01515 6. Employee No: E01520 7. Employee No: E01515 8. Employee No: E18199	
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>All the workers are employed under direct employment. 2 employment contracts were sampled and found that terms and conditions of the employment were clearly stated in the contract and signed by the workers. Sample of contact agreement and payslip (Month of Sept 2022, Nov 2022, and Mar 2023) was verified as below:</p> 1. Employee No: E18106 2. Employee No: E18042 3. Employee No: E18042 4. Employee No: E00121 5. Employee No: E01515 6. Employee No: E01520 7. Employee No: E01515 8. Employee No: E18199	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	<p>The estate management monitor the attendance and working time through checkroll book. Overtimes will be recorded in Overtime Form which is transparent to workers and the number of overtimes will be shown in the payslips.</p>	Complied
4.4.5.8	<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</p>	<p>Interview with the workers confirmed that they have rest time in between of the working hours. Overtimes were paid according to the rate stated in the agreement and regulatory requirements. The</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance -	overtime offered upon mutually agreement. Overtimes will be recorded in Overtime Form. Sample of contact agreement and payslip (Month of Sept 2022, Nov 2022, and Mar 2023) was verified as below: 1. Employee No: E18106 2. Employee No: E18042 3. Employee No: E18042 4. Employee No: E00121 5. Employee No: E01515 6. Employee No: E01520 7. Employee No: E01515 8. Employee No: E18199	
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Wages and overtime were paid according to Sabah Ordinance and Overtime Form of the workers. Total hours of overtime and daily attendance has recorded in the Lintramix system and the payslips. Refer to indicator 4.4.5.3.	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - Minor compliance -	All the workers are provided with free medical facilities. Free housing facilities were provided to all the workers and their families. Free transport to send the children of the workers to school. Place of worship was available for all the workers and their family members.	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. - Major compliance -	The mill management has provided free housing facilities to all the workers. Basic amenities such as water and electricity were provided to the workers. Line-site inspection was carried out on weekly basis by the Estate Hospital Assistant. Based on verification of the inspection records, any issues identified were recorded and appropriate actions	Complied

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Criterion / Indicator		Assessment Findings	Compliance																								
		<p>were taken accordingly. Latest inspection record sighted on 08/06/2023, 07/06/2023 and 06/06/2023.</p> <p>Monitoring of drinking water analysis has been conducted on quarterly basis as per plan. Analysis was conducted by appointed lab DYNAKEY Laboratories Sdn Bhd. Refer details below 2022 and 2023:</p> <table border="1"> <thead> <tr> <th>Quarter</th> <th>Date</th> <th>Ref. No.</th> <th>Lab Ref. No.</th> </tr> </thead> <tbody> <tr> <td>Q1 2022</td> <td>16/03/2022</td> <td>GJBE/DYK/23/03/020</td> <td>W230316/03</td> </tr> <tr> <td>Q2 2022</td> <td>25/07/2022</td> <td>GJBE/DYK/22/06/035</td> <td>W220630/07</td> </tr> <tr> <td>Q3 2022</td> <td>27/09/2022</td> <td>GJBE/DYK/22/09/011</td> <td>W220907/07</td> </tr> <tr> <td>Q4 2022</td> <td>30/12/2022</td> <td>GJBE/DYK/22/12/020</td> <td>W221215/07</td> </tr> <tr> <td>Q1 2023</td> <td>16/03/2023</td> <td>GJBE/DYK/23/03/020</td> <td>W230316/04</td> </tr> </tbody> </table>	Quarter	Date	Ref. No.	Lab Ref. No.	Q1 2022	16/03/2022	GJBE/DYK/23/03/020	W230316/03	Q2 2022	25/07/2022	GJBE/DYK/22/06/035	W220630/07	Q3 2022	27/09/2022	GJBE/DYK/22/09/011	W220907/07	Q4 2022	30/12/2022	GJBE/DYK/22/12/020	W221215/07	Q1 2023	16/03/2023	GJBE/DYK/23/03/020	W230316/04	
Quarter	Date	Ref. No.	Lab Ref. No.																								
Q1 2022	16/03/2022	GJBE/DYK/23/03/020	W230316/03																								
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4.4.5.12	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>Management unit established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited. Reproductive rights are protected. Briefing of the policy was conducted on 09/05/2023 to the workers during morning muster. Seen the training attendance list. Procedure on Prevention and Eradication of Sexual Harassment at the Workplace was established with Doc. No.: SMP-GPB-20, Rev. 0 dated 11/10/2013. Process of handling sexual harassment complaint was outlined in the procedure. Gender Committee was established in the estate and seen the last meeting was conducted on 18/02/2023. There was no case of sexual harassment and violence reported. Training for Sexual Harassment has been given 07/02/2023.</p>	Complied																								
4.4.5.13	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees</p>	<p>There is no trade union in any of the visited estates. Nonetheless, there is also no restriction for them to join any trade union. This is recognized by the employer though establishment of people Policy dated 03/08/2009. However, there is a meeting conducted for workers on</p>	Complied																								

Criterion / Indicator		Assessment Findings	Compliance																
	shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	quarterly basis to discuss if there is any issue related to them. Refer "Mesyuarat Jawatankuasa Wakil Pekerja" dated 13/02/2023.																	
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions. - Major compliance -	Children and young person were not employed or exploited. Based on the records in the employee's data base system, which has the information about date of birth and date join, there was no children and young person being employed.	Complied																
Criterion 4.4.6: Training and competency																			
4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept. - Major compliance -	Genting Jambongan Estate have established a training program for all workers based on the training need analysis conducted on a yearly basis. Records of trainings were maintained by the estates as below: - <table border="1" data-bbox="1048 1114 1816 1385"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Traceability Training</td> <td>06/06/2023</td> </tr> <tr> <td>Buffer Zone (Sprayers) Training</td> <td>09/05/2023</td> </tr> <tr> <td>Buffer Zone (Manurers) Training</td> <td>24/05/2023</td> </tr> <tr> <td>Scheduled Waste Training</td> <td>13/05/2023</td> </tr> <tr> <td>Store Management Training</td> <td>09/05/2023</td> </tr> <tr> <td>IPM Training</td> <td>11/04/2023</td> </tr> <tr> <td>Harvesting Training</td> <td>09/02/2023</td> </tr> </tbody> </table>	Training	Date	Traceability Training	06/06/2023	Buffer Zone (Sprayers) Training	09/05/2023	Buffer Zone (Manurers) Training	24/05/2023	Scheduled Waste Training	13/05/2023	Store Management Training	09/05/2023	IPM Training	11/04/2023	Harvesting Training	09/02/2023	Complied
Training	Date																		
Traceability Training	06/06/2023																		
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IPM Training	11/04/2023																		
Harvesting Training	09/02/2023																		

Criterion / Indicator		Assessment Findings	Compliance
		Compost Application Training	04/02/2023
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	Genting Jambongan Estate has developed a training need analysis and documented in the (Executive/Staff/Workers) Training Needs, Analysis and Plan for year 2023. The trainings were sighted to have also included Safety, Environment and Sustainability requirements.	Complied
4.4.6.3	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure. - Minor compliance -	A training programme has been developed and available in the Genting Jambongan Estate – Monthly Programme Training Year 2023. The trainings were sighted to have been categorised based on operation SOP, OSH training & wellness, sustainability training & awareness.	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	Genting Plantations Berhad have established the Environmental Policy signed by the President and CEO dated 20/07/2017. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the mill. Latest policy briefing dated 09/05/2023 was verified. The Sustainability Department team is also committed in establishing various working standards through procedures or pictorial method to ensure environmental preservations in the operational practises.	Complied
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations.	The estate has established the environmental management plan and documented in Environment Improvement & Management Plan. The plan identifies the source of pollution, its negative impacts,	Complied

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	- Major compliance -	improvement and mitigation plans, data required, monitoring and action plan, PIC, timeline, and its status. Among the pollution identified are loss of HCV areas and RTE species, soil erosion, water pollution (soil, agrochemicals, and fertilisers), Noise pollution, soil pollution, greenhouse gas emissions, waste management and water usage from workplace and housing. The mill has conducted the aspects and impacts analysis of all operations and documented in Environmental Compliance Report for Proposed Oil Palm Plantation on Jambongan Island, conducted by Chemsain Konsultant Sdn Bhd dated 05/05/2023.	
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance -	The estate has established the Environmental Improvement & Management Plan which was available for verification. Sighted the implementation of the management plan as follows: <ol style="list-style-type: none"> 1. Protection and demarcation of HCV areas within estate at sensitive areas. 2. Ensure plans are in place to enhance natural areas or built-up landscapes within the estate. 3. Avoid land clearing in high-risk erosion areas. 4. Ensure that phased developments are considered ensuring smaller land areas are exposed at any one time. 5. Ensure reduction plans are in place to reduce air particulate emissions. 6. Enforce no burning policy. 7. Avoid fertilizer application close to water bodies or on rainy days. 8. Proper scheduled waste management as per procedure. 	Complied

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4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	The estate has established program to promote the positive impacts and documented in Environmental Improvement & Management Plan as mentioned under indicator 4.5.1.3.	Complied												
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	The estate continuously provided awareness training to all employee on environmental policy, objectives, and management plan as per training plan established. Training record verified as stated in 4.4.6.1.	Complied												
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	Regular meetings between the management and workers mainly done during daily morning muster rollcall to discuss any issue related to estate operations including environmental issue. Specific environmental issues were discussed during periodical Genting Jambongan Estate – Sustainability Management Team (RSPO/MSPO/ISCC) which was latest conducted on 10/02/2023.	Complied												
Criterion 4.5.2: Efficiency of energy use and use of renewable energy															
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance -	<p>The estate maintains records of energy usage, which is reported monthly to head office. The monitoring of non-renewable energy usage is done monthly.:</p> <p>Sighted the sampled monitoring records for diesel and water per mt FFB usage at Genting Jambongan Estate for 2023 as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Diesel (L/FFB)</th> <th>Water (m³/FFB)</th> </tr> </thead> <tbody> <tr> <td>Jun 2022</td> <td>3.25</td> <td>1.40</td> </tr> <tr> <td>Jul 2022</td> <td>2.15</td> <td>1.23</td> </tr> <tr> <td>Aug 2022</td> <td>1.74</td> <td>0.99</td> </tr> </tbody> </table>	Month	Diesel (L/FFB)	Water (m ³ /FFB)	Jun 2022	3.25	1.40	Jul 2022	2.15	1.23	Aug 2022	1.74	0.99	Complied
Month	Diesel (L/FFB)	Water (m ³ /FFB)													
Jun 2022	3.25	1.40													
Jul 2022	2.15	1.23													
Aug 2022	1.74	0.99													

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		Sep 2022	1.33	0.98												
		Oct 2022	0.84	0.73												
		Nov 2022	0.96	0.50												
		Dec 2022	0.92	0.43												
		Jan 2023	1.34	1.19												
		Feb 2023	1.31	1.13												
		Mar 2023	1.21	1.02												
		Apr 2023	1.28	1.20												
		May 2023	1.31	1.03												
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estate estimates the usage of non-renewable energy (diesel) for genset and mobile machineries in annual budget as sighted in Genting Jambongan Estate Annual Budget FY 2023. The Estimation Diesel for 4 Years was available as below: Fossil Fuel Consumption Plan (L). <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>313,446</td> <td>320,672</td> <td>321,878</td> <td>329,363</td> <td>332,357</td> </tr> </tbody> </table>				2023	2024	2025	2026	2027	313,446	320,672	321,878	329,363	332,357	Complied
2023	2024	2025	2026	2027												
313,446	320,672	321,878	329,363	332,357												
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	No opportunity for renewable energy to be used at the estate visited.				Complied										
Criterion 4.5.3: Waste management and disposal																
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	All waste products and sources of pollution was identified and documented in the Waste Management Plan – Genting Jambongan Estate dated 19/05/2023 and Identification, Segregation and Storage of Waste – Genting Jambongan Estate dated 04/03/2023. The waste has been identified as follows: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Source</th> <th>Types of Waste</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>				Source	Types of Waste			Complied						
Source	Types of Waste															

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Criterion / Indicator		Assessment Findings		Compliance
		Workshop & Welding Shop	Filters, Lubricants, Battery, Rags & Gloves	
		Linesite	Recyclable and Domestic Waste	
		Office	Domestic and Recyclable Paper	
		Diesel tank	Scheduled Waste	
		Chemical Store	Container Boxes	
		Lubricant Store	Scheduled Waste	
		Scheduled Waste Store	Scheduled 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"> a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products <p>- Major compliance -</p>	<p>SOP for scheduled waste management was established and available in the Genting Plantations Berhad Procedure Manual – Scheduled Waste Management; Doc Number: SMP-GPB-11; Revision: 02; Issue Date: September 2020.</p> <p>For scheduled wastes, the handling was done according to the legal requirement where a scheduled waste store was constructed in each operating unit for storage.</p> <p>The estate also has a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>Sighted the sampled of Scheduled Waste Disposal as below:</p> <ol style="list-style-type: none"> 1. SW 102 – Used Battery; Date: 24/05/2023; Consignment Note Number: 2023052411SQV2IU; SW Contractor: Legenda Bumimas Sdn Bhd; Quantity: 0.3510 Mt. 2. SW 404 – Clinical Waste; Date: 09/05/2023; Consignment Note Number: 20230500; SW Contractor: Sedafiat Sdn Bhd; Quantity: 4.3 Kg. 		Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>3. SW 305 – Spent Lubricating Oil; Date: 24/05/2023; Consignment Note Number: 2023052411F2UQSB; SW Contractor: Legenda Bumimas Sdn Bhd; Quantity: 0.5500 Mt.</p> <p>4. SW 410 – Contaminated Cotton Rag and Used Filter; Date: 24/05/2023; Consignment Note Number: 2023052411D52BJA; SW Contractor: Legenda Bumimas Sdn Bhd; Quantity: 0.0360 Mt.</p>	
4.5.3.3	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>SOP for scheduled waste management was established and available in the Genting Plantations Berhad Procedure Manual – Scheduled Waste Management; Doc Number: SMP-GPB-11; Revision: 02; Issue Date: September 2020.</p> <p>The estate also has a proper Scheduled Waste Store for storing use chemical drums until time of disposal by DOE authorized waste disposal contractor. Disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>Sighted the sampled of Chemical Container Disposal as below: SW 409 – Used Lubricant Drum; Date: 24/05/2023; Consignment Note Number: 2023052411J0Z2CS; SW Contractor: Legenda Bumimas Sdn Bhd; Quantity: 0.1620 Mt.</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>- Major compliance -</p>	<p>Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through recycle waste contractor. Sighted the sampled of Chemical Container Disposal as below: SW 409 – Used Lubricant Drum; Date: 24/05/2023; Consignment Note Number: 2023052411J0Z2CS; SW Contractor: Legenda Bumimas Sdn Bhd; Quantity: 0.1620 Mt.</p>	Complied
4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk</p>	<p>Method of handling the domestic/general wastes is segregation at the collection point from offices and housing area before being disposed</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	of contamination of the environment and watercourses. - Minor compliance -	through Genting Jambongan Estate landfill. Verified during the visit to the landfill that there were no disposal of Scheduled Waste or Recyclable Waste items.	
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	An assessment plan for all identified polluting activities was established based on the Environment Aspect and Impact assessment. Polluting activities were monitored and monitors as per the established Environment Management Plan which include scheduled waste storage and disposal record, Green House Gas emission and recyclable waste.	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The estate has conducted assessment of all polluting activities in the Environmental Aspect Impact analysis. A management plan has been established based on the significant aspect, documented in the Pollution Prevention Plan dated 04/03/2023. The plan was reviewed on annual basis.	Complied
Criterion 4.5.5: Natural water resources			
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application,	Genting Jambongan Estate has developed its Water Management Plan latest review on 22/05/2023. It monitored water quality of outgoing waters to identify any adverse effect from the mill and estate activities. The plan considers the efficient use of resources, ensure amongst others that the use of water did not impact on other users, avoid contamination of ground and surface water. Sighted the implementation of the management plan as follows: a. The mill monitors the water consumption on monthly basis. Water consumption monitored include domestic usage and estate	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<p>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>- Major compliance -</p>	<p>operation. The water consumption has been detailed out under indicator 4.5.2.1</p> <p>b. Water for Domestic use is monitored on a quarterly basis in accordance with the Drinking Water Quality Standards. The latest domestic water sampling was conducted by Dynakey Laboratories Sdn Bhd on 16/03/2023 which indicated that all the parameters were within the stipulated limits. The certificate of analysis (Lab No: W230316/04, W230316/05 and W230316/06) was available for verification.</p> <p>c. The estates have maintained their allocated riparian zones in accordance with their established guideline. Records of Riparian Zone monitoring for the estate were available for verification. Interview with the sampled workers showed that the workers understand the restriction and the consequence of agrochemicals application in the riparian zones.</p> <p>d. The estates continuously monitor the river water quality. There were 4 water Sampling Points identified for Water Quality Monitoring. Latest report available was for the month of January 2023. The Water Quality Analysis Results indicated the pH, TSS, Ammonical Nitrogen except for Dissolved Oxygen (DO) complied with respective NWQSM class III.</p>	
4.5.5.2	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p>- Minor compliance -</p>	<p>There were no construction of bunds, weirs and dams across main rivers or waterways passing through an estate</p>	Complied
4.5.5.3	<p>Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).</p>	<p>Water management plan includes rainwater harvesting, desilting of roadside drains etc. For housing complex, the rainwater harvesting was used for cleaning housing compound etc.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance	
- Minor compliance -			
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			
4.5.6.1	<p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <ul style="list-style-type: none"> a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. <p>- Major compliance -</p>	<p>Genting Jambongan Estate has conducted HCV Assessment documented in Determination and Management of High Conservation Value (HCV) Sites and Social and Environmental Impact Assessment within the New Planting Sites of Genting Jambongan Estate, Jambongan Island, Sabah and Inventory on HCV Sites Within Genting Plantations Berhad Group of Estates (Sabah Region).</p> <p>Identified high biodiversity value habitats expressed as High Conservation Value (HCV) as following:</p> <ul style="list-style-type: none"> - HCV 1.2: Threatened and Endangered Species – Proboscis Monkey and False Gharial - HCV 4.2: Erosion Control – portion of Blocks 51, 55 and 56 were too steep for planting. - HCV 5: Basic Needs to Local Communities. 	Complied
4.5.6.2	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <ul style="list-style-type: none"> a. Ensuring that any legal requirements relating to the protection of the species are met. b. Discouraging any illegal or inappropriate hunting, fishing, or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. <p>- Major compliance -</p>	<p>Based on the recommendation from HCV assessment, Genting Jambongan Estate has established the management plan as documented in Management and Monitoring Plan for HCV areas within Genting Jambongan Estate. The plan was latest reviewed in 04/03/2023. Among the management action established are:</p> <ol style="list-style-type: none"> 1. Install signage on riparian and buffer zone with no illegal hunting and collecting and no unauthorized entry. 2. Regular patrol to all riparian, buffer zone and boundary area 3. Socialize the HCV assessment which consist of identification, management, and monitoring to all employees. 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		4. Inform all stakeholders on the HCV assessment and monitoring during stakeholder’s consultation meeting	
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. - Major compliance -	The estate has established Management and Monitoring Plan for HCV areas within Genting Jambongan Estate as per recommendation by HCV assessment report. Sighted the implementation of the management plan as follows: 1. Signage on illegal hunting and collecting was erected. 2. Regular patrolling was done at HCV areas. 3. Signage informing HCV areas has been established. 4. HCV Awareness Training conducted to create awareness among workers dated 09/05/2023 for Sprayers and 29/05/2023 for manurers. 5. HCV Awareness conducted for stakeholders during the Stakeholders Meeting dated 11/05/2023.	Complied
Criterion 4.5.7: Zero burning practices			
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -	Genting Jambongan Estate adopted Genting Plantations Berhad’s Zero Burning Policy as published in company’s website via link as following: https://www.gentingplantations.com/wp-content/uploads/2022/05/GENP-Zero-Burning-Policy.pdf It was verified during the field visit that there is no use of fire for planting preparation. No fire for domestic wastes too as it was disposed through designated landfill.	Complied
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where	No open burning noted based on the records on the land clearing and felling for the replanting at the estate. Method of land clearing and	NA

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Criterion / Indicator		Assessment Findings	Compliance
	there is a significant risk of disease spread or continuation into the next crop. - Major compliance -	preparation was used such as felling & chipping, cambering/land forming and path construction.	
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	No open burning noted based on the records on the land clearing and felling for the replanting at the estate. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	NA
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	No open burning noted based on the records on the land clearing and felling for the replanting at the estate. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Standard Operating procedure has been addressed in the Sustainability Management Procedure Manual Update June 2022, Standard Operating Procedures (SOP) dated 11/01/2023 and The Oil Palm Manual. The manual covering the activity for future replanting, oil palm nursery practices, planting techniques, soil conservation and terracing, pest, and diseases, weed management, manuring of oil palm, immaturity, harvesting, crop forecasting and managing difficult soils. All the activities have been described comprehensively in the Standard operating procedure (SOP) and pictorial SOP. The estate implemented the SOPs through its daily operations. Based on the Genting Plantations Berhad Sustainability Management Procedure Manual – Water Sampling and Analysis; Doc Number SMP-	Minor Nonconformity

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Criterion / Indicator		Assessment Findings	Compliance
		GPB-15; Issued Date: Jan 2023; 5.2 Management plan/action plan shall be prepared, implemented & monitored when any abnormal results are observed. Based on the Surface Water Quality Report carried out on 31/01/2023 which indicates (DO) did not comply with Class III of NWQSM, there were no evidence that an action plan has been prepared, implemented, or monitored. Hence a Minor Non-Conformity was raised.	
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. - Major compliance -	The soil conservation measures implemented at the sloping areas are construction of terrace, establishment of cover crop and construction of roadside drain. This is guided by the SOP Steep Slopes Management Doc No. SMP-GPB-10 dated 18/03/2021. The objective was to ensure soil conservation, prevention, control of erosion and safety at steep slopes.	Complied
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	Visual identification has been established for each field and divided into division and blocks. Each block is named by visual identification (field marker) erected for reference. Cross checked with the records and the pictorial evidence provided found to be consistent.	Complied
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	Annual business plan is addressed in the form of annual budget and the projection for 5 years (2023-2027). It has the information about projected FFB production, finance allocations for operations such as harvesting and field upkeep, administration, and capital expenditure.	Complied
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5	Annual Replanting Program has been established for the estate. There was no replanting planned for the next 5 years as the oldest palm is only 19 years old planted in 2004.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	years. - Major compliance -		
4.6.2.3	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment - Major compliance -	Verification of the 2023 budget showed that the information such as crop projection, cost of production and return of investment was available.	Complied
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	Monitoring of actual expenses against the allocated budget for the field operation is reported monthly and justification of underspent or overspent can be seen in the monthly expenditure and progress report.	Complied
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Pricing mechanism for product and services was normally done through opened tender or comparison of quotations. Opened tender is guided by Tender Procedure (doc. no.: PLA-02, rev. 2, dated 17/12/2020) and comparison of quotations is guided by Capital Expenditure, rev. 1, dated 31/05/2013, which has the details about request of quotations and limit of approval by designations. To-date, there has been no complaint lodge by suppliers or service providers with regards to the pricing mechanism.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>Verification of payment advice for transporting FFB showed that the payments were made in timely manner (agreed timing is within 30 days from the date the transportation work is carried out) and amount is in accordance with the contract agreements.</p> <p>Sample of contactor agreement were verified as below:</p> <ol style="list-style-type: none"> 1. Contractor; SXXXXXXXX CX, Type of work: FFB Transport dated 01/01/2023 with reference number: GJBE/FFB/23/01/01. <ul style="list-style-type: none"> • Latest payment checked: 30/04/2023 with reference I000969. 2. Contractor; PXXXXXXXXXXXX YXX KXXX, Type of work: FFB Transport dated 01/01/2023 with reference number: GJBE/FFB/23/01/03. <ul style="list-style-type: none"> • Latest payment checked: 31/03/2023 with reference number T0789. <p>Interview with contractors also confirmed that payment was made promptly.</p>	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	<p>Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p>	<p>Sample of contractor for FFB transport was verified. The contractors engaged by the estate management has signed agreement prior to provide services. There were clauses where the contractors shall ensure compliance with the requirements of RSPO, ISCC, MSPO and OSHA 1994. Interview with the contractor confirmed that MSPO requirements were briefed by the management and has a good understanding with the requirements.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	The management has provided contract agreements that have been mutually agreed by the contractors. Sample of contractor agreement were verified as below: 1. Contractor; SXXXXXXXX CX, Type of work: FFB Transport dated 01/01/2023 with reference number: GJBE/FFB/23/01/01. 2. Contractor; PXXXXXXXXXXXX YXX KXXX, Type of work: FFB Transport dated 01/01/2023 with reference number: GJBE/FFB/23/01/03	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	Genting Jambongan Estate certification unit has no objection to allow BSI auditors to verify the assessment through physical inspection if required. The contractors have signed an addendum of their contract agreement that requires them to provide cooperation and relevant access to appointed CB into their respective operations, systems and all information when this is announced in advance.	Complied
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	Delivery of task is verified by the estates before proceeding for payment. Evaluation of task was normally done through utilisation of the company's "Schedule of Work Completed" (SOWC) – General Work Order. Verification of the forms showed that checking of tasks were done and acknowledged by the contractors.	Complied
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation.	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia’s National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA
Criterion 4.7.2: Peat Land			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA

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Criterion / Indicator		Assessment Findings	Compliance
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA
Criterion 4.7.4: Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA

Criterion / Indicator		Assessment Findings	Compliance
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA
Criterion 4.7.6: Customary land			
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA

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Criterion / Indicator		Assessment Findings	Compliance
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - Major compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	This indicator is not applicable as there were no new planting at Genting Jambongan Estate.	NA

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	Genting Oil Mills (Sabah) Sdn Bhd have established the policy "Genting Plantations – Sustainability Policy" signed by the Chief Operating Officer, dated 03/08/2009. The implementation of MSPO has been incorporated in the policy.	Complied
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	Genting Oil Mills (Sabah) Sdn Bhd have established the policy "Genting Plantations – Sustainability Policy" signed by the Chief Operating Officer, dated 03/08/2009. The policy covers commitment to: <ul style="list-style-type: none"> - Ensure that all operations are managed efficiently with the highest possible level of transparency, integrity, and accountability. - Ensure that all operations comply with all applicable legal requirements. - Continue to invest in and develop human capital. - Provide a safe and healthy environment for all employees, contractors, suppliers, and visitors. - Strive to achieve long term economic and financial viability. - Adopt effective and practical best management practices in all operations. - Strive to conserve and protect any valuable natural resources and biodiversity within the landholdings. 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Genting Plantations Berhad has established internal audit procedures documented in Genting Plantations Berhad; Sustainability Management Procedure Manual; Sustainability Internal Audit; Doc Number: SMP-GDB-03; Revision: 07; Issue Date: June 2022. Based on the procedure, the internal audit is to be conducted annually as per Sustainability Internal Audit Procedure. Verified that the mill has conducted the internal audit on a yearly basis. MSPO Internal Audit was conducted on 09 – 10/03/2023 by Sustainability Department at Genting Jambongan Oil Mill. The Internal Audit Report was available for verification.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Genting Plantations Berhad has established internal audit procedures documented in Genting Plantations Berhad; Sustainability Management Procedure Manual; Doc Number: SMP-GDB-03; Revision: 07; Issue Date: June 2022. MSPO Internal Audit was conducted on 09 – 10/03/2023 by Sustainability Department. The Internal Audit Report was available for verification. During the assessment, the internal audit team raised 0 Major and 0 Minor Non-Conformities, and 4 observations raised in regard to MSPO Standard.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The internal audit report was documented and made available for management review. As evidence, all findings from internal audit were acknowledged by Mill Management. Report details as below.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		MSPO Internal Audit was conducted on 09 – 10/03/2023 by Sustainability Department. The Internal Audit Report was available for verification.	
Criterion 4.1.3 – Management Review			
4.1.3.1	<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>- Major compliance -</p>	<p>Genting Plantations Berhad has established SOP for Management Review documented in Genting Plantations Berhad; Sustainability Management Procedure manual; Management Review; Doc Number: SMP-GPB-06; Issue date: September 2020. Based on the SOP established, the frequency for management review needs to be carried out at least once a year.</p> <ul style="list-style-type: none"> – Management Review Meeting conducted on 29/05/2023 at Genting Jambongan Oil Mill <p>The agenda discussed during the meeting as follows, among others:</p> <ol style="list-style-type: none"> 1. Status of outstanding issues from previous meetings 2. Changes, improvement, or modification of the Sustainability management System 3. Internal and external audit findings on Sustainability Management System 4. Complaints, grievances and Enquiry Book/Record. 5. Review Continual Improvement status & its recommendations 6. Review of Sustainability Policy and its objectives status 7. Compliance status and legal requirements 8. Preventive and Corrective Actions 9. Follow up actions from management review 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		10. Changes that could affect the management review 11. Customer feedback 12. Recommendations for improvement.	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	Genting Jambongan Oil Mill has established the continuous Improvement plan, documented in the GJOM Continuous Improvement Plan dated 26/05/2023. Among the action plan for continuous improvements were, <ol style="list-style-type: none"> 1. To improve on environmental aspects and impacts risk assessment and risk control. 2. Conserve HCV areas and riparian buffer zones. 3. To receive and act on any environmental complaints through internal and external communication. 4. Maximizing recycling and minimizing waste or by-products generation. 5. Continue to make full use of the biomass wastage. 6. Pollution prevention/ mitigation plan drawn up based on identified waste and pollutants. 7. Improve condition of tractors. 8. To maintain and improve interior and exterior of workers quarters. 9. Record keeping of performances and expenditures. 10. To install good Health and Safety culture in the community. 	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.1.4.2	<p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.</p> <p>- Major compliance -</p>	<p>This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the Top Management are transacted during the Managers meetings and emails.</p>	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	<p>The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.</p> <p>- Major compliance -</p>	<p>Management unit has established Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 23/02/2018 for the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties.</p> <p>Meeting shall be carried out at least six monthly and annually for internal and external stakeholders. The topics to be discussed such as complaint & grievances, environmental and biodiversity concerns, social issue and suggestions for improvement.</p> <p>The procedure has been briefed to the internal and external stakeholders. Briefing to the external stakeholders was conducted during the stakeholder meeting conducted on 11/05/2023. Issues raised and actions taken during the stakeholders meeting were well recorded in a management plan and made available for verification.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>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.</p> <p>- Major compliance -</p>	<p>Management unit has established Requests and Responses with Doc. No.: SMP-GPB-25, Rev. 0 dated 14/08/2014 to define the responsibilities to respond constructively and promptly to the information requested by stakeholders.</p> <p>Based on the procedure, the list of documents which are publicly available as follows:</p> <ol style="list-style-type: none"> 1. Company annual report 2. Group policies 3. Reports related to environment such as EIA, EAI 4. RSPO external audit reports 5. Pollution prevention plan 6. Continuous improvement plan 7. Complaints and grievances book and its procedure 8. Negotiation and compensation procedure 9. Sexual harassment procedure <p>Management unit has issued the list of documents that could be requested by the stakeholders to all the relevant stakeholders of the mill. The stakeholders are required to register in Enquiry Register Book prior to access to the documents. The list of documents not limited to:</p> <ol style="list-style-type: none"> 1. Land title 2. Policies 3. Reports – EAI, SIA, HCV and audit reports 4. Management plans 5. Procedures 	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		The stakeholders were briefed on the request and response during the stakeholder meeting conducted on 11/05/2023.	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	Management unit has established Procedures for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 23/02/2018 for the effective internal and external communication of sustainability requirements and responding to communications from local communities and other affected or interested parties. Meeting shall be carried out at least six monthly and annually for internal and external stakeholders. The topics to be discussed such as complaint & grievances, environmental and biodiversity concerns, social issue and suggestions for improvement.	Complied
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	The Mill Manager has been appointed by Senior Manager Operations to be the representative for ISCC, RSPO and MSPO related matters. Appointment letter dated 15/02/2023 was made available for verification.	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance -	Refer Stakeholders List dated 26/05/2023. The stakeholders such as contractors, suppliers, local communities and government authorities were included into the list. A combined stakeholder meeting was conducted on 11/05/2023 in Genting Jambangan Estate. Stakeholders such as local communities, local authorities, contractors and suppliers were invited and attended the meeting. Seen the meeting minutes and requests from the stakeholders were recorded in the minutes.	Complied
Criterion 4.2.3 – Traceability			

Criterion / Indicator		Assessment Findings	Compliance
4.2.3.1	<p>The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.</p> <p>- Major compliance -</p>	<p>Genting Plantations Berhad has developed the Genting Plantations Berhad Sustainability Management Procedure Manual – Supply Chain and Traceability (Palm Oil Mill); Doc Number: SMP-GPB-23; Revision: 14; Issue Date: June 2022. The objective of the procedure is as below.</p> <ul style="list-style-type: none"> - To ensure that handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. - To ensure appropriate controls are in place to manage various types of certified and non-certified products according to ISCC EU, MSPO and RSPO requirements. 	Complied
4.2.3.2	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p>- Major compliance -</p>	<p>Inspection on the compliance of the traceability system were made on daily basis. The weighbridge operator key in all the related data into the system and verified by the executive at the end of the day. Sighted the weighbridge records and FFB delivery notes for incoming FFB and outgoing CPO and PK from the mill.</p> <p>The Sustainability Department – Sustainability Internal Audit conducted on a yearly basis to monitor compliance towards traceability at the mill. Verified the latest MSPO Internal Audit Report dated 09 – 10/03/2023.</p>	Complied
4.2.3.3	<p>The management shall identified and assign suitable employees to implement and maintain traceability system.</p> <p>- Minor compliance -</p>	<p>Genting Jambongan Oil Mill has appointed the Acting Clerk of Genting Jambongan Oil Mill as the Person In-Charge for Supply Chain, Traceability and Mass Balance requirements of RSPO, ISCC and MSPO Sustainability Standards, dated 03/01/2022, undersigned by the Mill Acting Manager.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																								
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	<p>Genting Plantations Berhad has developed the Genting Plantations Berhad Sustainability Management Procedure Manual – Supply Chain and Traceability (Palm Oil Mill); Doc Number: SMP-GPB-23; Revision: 14; Issue Date: June 2022.</p> <p>The procedure states that records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained by the mill.</p> <p>Reviewed the sampled records of FFB, CPO and PK as follows:</p> <table border="1"> <thead> <tr> <th>Details</th> <th>FFB</th> <th>CPO</th> <th>PK</th> </tr> </thead> <tbody> <tr> <td>Customer</td> <td>Genting Jambongan Estate</td> <td>XXX</td> <td>XXX</td> </tr> <tr> <td>Product</td> <td>FFB</td> <td>CPO</td> <td>PK</td> </tr> <tr> <td>Date</td> <td>02/02/2023</td> <td>02/04/2023</td> <td>07/02/2023</td> </tr> <tr> <td>Weighbridge Ticket Number</td> <td>FFB23000766 W</td> <td>CPOEU23000 053W</td> <td>PKMB230000 28W</td> </tr> <tr> <td>Nett Weight</td> <td>9,830 KG</td> <td>36,470 KG</td> <td>11.770 KG</td> </tr> </tbody> </table>	Details	FFB	CPO	PK	Customer	Genting Jambongan Estate	XXX	XXX	Product	FFB	CPO	PK	Date	02/02/2023	02/04/2023	07/02/2023	Weighbridge Ticket Number	FFB23000766 W	CPOEU23000 053W	PKMB230000 28W	Nett Weight	9,830 KG	36,470 KG	11.770 KG	Complied
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4.3 Principle 3: Compliance to legal requirements																											
Criterion 4.3.1 – Regulatory requirements																											
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	<p>Genting Jambongan Oil Mill continues to demonstrate their commitment towards compliance with legal requirements. Among the evidence of compliance verified were:</p> <p>1. MPOB License; License Number: 620052004000; License Validity Period: 01/03/2023 – 28/02/2024.</p>	Complied																								

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Criterion / Indicator		Assessment Findings	Compliance
		2. License to Store Diesel, Petrol and Kerosene; License Number: PPDBKK.SDK.25/2005 (SK); Serial Number: S 0022548; License Validity Period: 03/08/2021 – 02/08/2024. 3. Energy Commission License – Private Installation; License Number: ST(SSD)L/SBH/02980; License Validity Period” 27/04/2023 – 26/04/2024. 4. Fire Certificate; Certificate Number: JBPM: SB/7/168/2022. License Validity Period: 18/10/2022 – 17/10/2023. 5. DOE License; License Number 005264; License Validity Period: 01/07/2022 – 31/06/2023. 6. License to Employ Non-Residential Workers; License Number: JTK.H.SDK.600-4/1/1/10401/0007217; License Validity Period: 13/09/2022 – 12/09/2023.	
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -	Genting Plantations Berhad have established Genting Plantations Berhad Sustainability Management Procedure Manual – Legal Requirement Register (LRR); Doc Number: SMP-GPB-22’ Revision: 11; Issue Date: Jan 2023. All legal requirements were documented in Legal Requirement Register available at the mill. The register is reviewed regularly and updated as and when there are new or amended legal requirements that are applicable to the mill operations.	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	All legal requirements were documented in Legal Requirement Register available at the mill. The register is reviewed regularly and updated as and when there are new or amended legal requirements that are applicable to the mill operations.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.</p> <p>On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Tracking system on any changes in the law is well implemented.</p> <p>Genting Jambongan Oil Mill have appointed the Chief Clerk as the PIC for Updating Changes in laws at Genting Jambongan Oil Mill as stated in the appointment letter dated 03/01/2022, undersigned by the Mill Acting Manager.</p>	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>The Oil Palm Milling activities does not diminish the land use rights of other users. Genting Jambongan Oil Mill was located inside of the land of Genting Jambongan Estate, Title No. Country Lease 08XXXXXXX. The land is belonging to Genting Oil Mills (Sabah) Sdn Bhd. Sighted the copy of the land title. There is no issue on land use claims evidence during the audit. Interviewed with the local communities confirmed that no land encroachment or land dispute reported.</p>	Complied
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.</p> <p>- Major compliance -</p>	<p>Management unit has provided documents showing legal lease document. Genting Jambongan Oil Mill was located inside of the land of Genting Jambongan Estate, Title No. Country Lease 08XXXXXXX. The land is belonging to Genting Oil Mills (Sabah) Sdn Bhd. Sighted the copy of the land title. There is no issue on land use claims evidence during the audit. Interviewed with the</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		local communities confirmed that no land encroachment or land dispute reported.	
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Genting Jambongan Oil Mill is located within the Genting Jambongan Estate land title. Fencing parameters established around the mill building complex to separate the management boundary of estate and the mill. The housing and other recreational facilities are located within the same vicinity for ease of employees' management.	Complied
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute in the Genting Jambongan Oil Mill at the time of audit. The land belongs to Genting Oil Mills (Sabah) Sdn Bhd and land ownership documents verified. Interview with the local communities confirmed that no land encroachment or land dispute reported.	NA
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land or negotiated agreements within the Genting Jambongan Oil Mill land area.	NA
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	There is no customary land or negotiated agreements within the Genting Jambongan Oil Mill land area.	NA
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	There is no customary land or negotiated agreements within the Genting Jambongan Oil Mill land area.	NA

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Criterion / Indicator	Assessment Findings	Compliance	
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Social Impact Assessment (SIA) & Human Rights Impact Assessment (HRIM) Report was reviewed on April 2021 for both Genting Jambongan Oil Mill and Genting Jambongan Estate by Sustainability Department. The assessment has involved relevant stakeholders such as schools' representatives, local authorities and workers. No negative impact was identified during the assessment through interview. Social Management and Monitoring Plan of Genting Jambongan Mill was reviewed and last updated on 26/05/2023.	Complied
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	Management unit has established Complaints and Grievances procedure with Doc. No.: SMP-GPB-19, Rev. 05 dated 13/05/2022 to provide guidelines on handling complaints & grievances involved internal and external stakeholders. All the written confidential complaints shall be dealt by Manager. The timeframe for the action to be taken depends on seriousness of the complaints or grievance. The accepted timeframe to acknowledge and respond to the complaint or grievances is within 1 month upon receipt.	Complied
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	The mill has implemented Complaints/ Grievances Record Book to record any complaint or grievance received. Most of the complaints were of road conditions by the local communities and maintenance of housing facilities. Based on verification of the	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>complaints/grievance records, all the issues were resolved in appropriate manner. Sample of complaint record as below:</p> <ol style="list-style-type: none"> 1. Complainant: Yatie/Yusri, Date: 25/04/2023, Issue: Grass growth at the roof guard, Issue has been solved on 20/05/2023 and initialed by the complainant. 2. Complainant: Junardin Ibrahim, Date: 10/02/2023, Issue: Request for lamp replacement, Issue has been solved on 16/03/2023 (Due to late receiving of lamp from supplier) and initialed by the complainant. 	
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.</p> <p>- Minor compliance -</p>	<p>A complaint form was available at the premises. The Complaints/Grievances Record Book serves as complaint forms and made available in the office. Apart from that, complaints can also be lodged through a complaint box which was available at the labour quarters and security post. Interview with the workers and stakeholders confirmed that they are aware of both mechanisms.</p>	Complied
4.4.2.4	<p>Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.</p> <p>- Minor compliance -</p>	<p>Employees and stakeholders were aware on the complaint's procedure. Training and briefing were given to them on 11/05/2023 during the stakeholder meeting. Interviewed with the external stakeholders confirmed that they are aware of the complaint procedure.</p>	Complied
4.4.2.5	<p>Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.</p> <p>- Major compliance -</p>	<p>Compliant record for the past 24 month was kept by the management unit. The document was available for affected stakeholders upon request. Records of complaint or grievance for June 2020 were available for review during the audit.</p>	Complied
<p>Criterion 4.4.3: Commitment to contribute to local sustainable development</p>			

Criterion / Indicator		Assessment Findings	Compliance
4.4.3.1	<p>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.</p> <p>- Minor compliance -</p>	<p>Management unit is located in an island and surrounded by several villages. The company and the local communities, including schools, have established good relationship between themselves ever since the setup of the estate in the island. Among the contributions provided by the company are road maintenance, distribution of clean water to local communities, and monetary donations to the schools. The existence of the company has also provided a good job opportunity to the locals and many of them are currently working for the company. Latest sample of CSR includes:</p> <ol style="list-style-type: none"> 1. Providing transport for worker’s children from village to nearby school. 2. Annual Mill Feast with involvement from villagers on yearly basis. 3. Water assistance to villagers during dry seasons. 	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Genting Plantations Berhad have established the "<i>Dasar Keselamatan Dan Kesihatan Pekerjaan</i>" (Occupational Safety and Health Policy) signed by the President and CEO dated 01/07/2018. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the mill. Latest policy briefing dated 12/02/2023 was verified.</p> <p>The Sustainability Department team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		The mill has established Safety and Health Management Plan 2023. The management plan includes the ESH Risk Management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring, Health monitoring.	
4.4.4.2	<p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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). 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. f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust 	<p>The occupational safety and health plan cover the following:</p> <ul style="list-style-type: none"> a. Genting Plantations Berhad have established the "<i>Dasar Keselamatan Dan Kesihatan Pekerjaan</i>" (Occupational Safety and Health Policy) signed by the President and CEO dated 01/07/2018. The policy has been communicated to the staffs and workers through induction training for new workers, morning briefing and displayed at various notice boards within the mill. The policy has been briefed to all workers on 12/02/2023. b. Genting Plantations Berhad have established Standard Operating Procedure documented in Genting Plantations Berhad Sustainability Management Procedure Manual – Risk Management and Risk Assessment; Doc Number: SMP-GPB-08; Revision: 00; Issue Date: 11/10/2013. Genting Jambongan Oil Mill have conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment covers all main operations and support operations. Among the activities verified in the HIRARC included Weighbridge, Grading, Sterilizer, Electrical, Heavy Vehicle and Sludge Pit. HIRARC is reviewed on annually and as and when there are any accidents that occur in the mill. <p>Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard</p>	Complied

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	<p>shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the mill.</p> <ul style="list-style-type: none"> - The Chemical Health Risk Assessment Report (Report Number: RSSB/CHRA/2019-156) conducted by Rehpro Scientific Sdn Bhd (DOSH Registration: HQ/11/ASS/00/290) on 10/12/2019 was available for verification. <p>Medical Surveillance was conducted for workers exposed to chemicals and welding fumes in the mill as recommended in the CHRA. The medical surveillance was conducted to monitor the level of exposure on the workers towards the chemicals and fumes.</p> <ul style="list-style-type: none"> - Medical Surveillance was conducted on 22/07/2022 at Mabello Group of Clinics for 11 mill workers exposed to chemicals in the mill laboratory and workshop. The results indicated that all workers were safe to work. <p>Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the mill.</p> <ul style="list-style-type: none"> - The assessment was conducted on 19 – 20/04/2021 by Sherman Services & Supply. The assessment report (Ref. No: SSS/NOISE – 302/21) was available for verification. <p>Audiometric Test was done for workers exposed to excess noise at the workplace in compliance with the Noise Risk Assessment.</p> <p>Audiometric Test was conducted on 15/03/2023 for total 30 workers by DAB OH Sdn Bhd and the Audiometric Report was</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>available for verification. The report stated that there were 28 workers with normal hearing and 2 workers with abnormal results, to be examined by OHD.</p> <p>c. The mill has established a training program for employees exposed to chemicals used at the oil mill to ensure continuous awareness to the employees. The training was conducted by the Manager, Asst. Manager, and representative from the chemical suppliers to the supervisors and operators. Sighted the training records as follows:</p> <ul style="list-style-type: none"> • Chemical Handling Training dated 01/06/2023 <p>d. The mill has provided appropriate PPE to all workers according to the job type and requirements. All PPE were provided in accordance with the risk assessment and recommendations as per legal documents such as CHRA, NRA and SDS. All PPEs are provided free of charge by the management to the workers.</p> <p>Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>e. Standard Operating Procedures for Handling of Chemicals were available in several documents such as:</p> <ul style="list-style-type: none"> – Genting Jambongan Oil Mill – Store SOP; Title: Handling on Chemicals and Oils; Document Number: GJOM-SOP-STOR-02; Effective Date: 01/05/2014. <p>f. Mill management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Mill Acting Manager. The Mill Acting</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Manager was appointed to be the Chairman of OSH Committee at the mill as stated in the appointment letter dated 08/12/2021 undersigned by the Senior Manager – Processing (Sabah).</p> <p>g. The management conducted regular OSH committee meetings on quarterly basis and when necessary due to accidents that occur. The meeting discussed issues on employees’ safety, health and welfare such as operational risks and health achievement report, mill security, safety compliance by contractors, workplace inspection, legal compliance, safety and health training.</p> <p>Sighted the OSH Meeting Minutes dated 28/04/2023 (02/2023), 24/01/2023 (01/2023), 25/10/2022 (04/2022) and 23/07/2022 (03/2022).</p> <p>h. Accident and Emergency procedures were available in the Genting Plantations Berhad – Genting Jambongan Oil Mill System Procedure; Emergency Response Procedure; Document Number: SP-MGR-04; Issue Date: 01/08/2017. The mill has established Emergency Response Team lead by the Mill Acting Manager. The "<i>Carta Organisasi Ahli Jawatankuasa Pasukan Tindakan Kecemasan (ERT) – GJOM</i>" was available for verification. Emergency Response Plans were available for incidents such as pesticides spillages, Fire, Explosions, Diesel Spillage and Accidents. The ERT chart and Fire Extinguisher Map was also available and verified.</p> <p>Emergency Response Training was conducted as below:</p> <ul style="list-style-type: none"> - Fire Drill and Fire Fighting Training – 16/04/2023. - Emergency Equipment & Action – Spillage (Compost 	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Plant) Training dated 07/06/2023.</p> <p>i. First aiders were assigned to various workstation at the mill. The supervisors and staffs were responsible for first aid boxes at each workstation assigned to them by the management. The first aid box was recently replenished with all stated items available in the box. First Aid trainings were conducted regularly at the mill and documents of trainings were verified as below:</p> <ul style="list-style-type: none"> - First Aider Training was conducted on 22/05/2023. <p>j. The mill recorded all accidents reports and reported to HQ using the GJOM – Accident Statistic Report Monthly update form. The accident occurred was reviewed on quarterly basis during OSH committee meeting.</p> <p>There were 1 accident (2 Days LTA) case for the year 2022 reported in the mill. The JKPP 8 form has been submitted to DOSH for the year ending 2022 on 12/01/2023 and documents available for verification. For the year 2023 there were no accident cases reported as of to date.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees. - Major compliance -	Management unit has established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company respect human rights and support international human rights law. Briefing of the policy was conducted on 16/02/2023 to the workers during morning muster. Seen the training attendance list.	Complied
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment	Management unit has established Social Policy dated 14/09/2020 signed by President & Chief Operating Officer. The company shall	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.	
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	There were employment contracts for staffs and workers. Pay and conditions are documented and achieved the Minimum Wage Order 2022. Sampled of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Sabah Ordinance which have been signed by the worker. Sample of contact agreement and payslip (Month of Sept 2022, Nov 2022 and Mar 2023) was verified as below: 1. Employee No: E00066 2. Employee No: E00160 3. Employee No: E00002 4. Employee No: E00156 5. Employee No: E00127	Complied
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance -	The mill did not engage any permanent contractor to work in the mill. Only based on project basis and there were no permanent workers engaged by the contractor. The only contractor involved was Hai Heng Enterprise but handled under Genting Oil Mills (Sabah) Sdn Bhd, Kuala Lumpur. All records were kept at the HQ, KL. Detail of agreement as per 4.6.4.	Complied
4.4.5.5	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain	The mill has registered all the workers into the system Lintramix where record of full name, employee no., date joined, gender, date of birth, wages and type of work were clearly stated in the	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<p>full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>list. Sample of contact agreement and payslip (Month of Sept 2022, Nov 2022 and Mar 2023) was verified as below:</p> <ol style="list-style-type: none"> 1. Employee No: E00066 2. Employee No: E00160 3. Employee No: E00002 4. Employee No: E00156 Employee No: E00127 	
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>All the workers are employed under direct employment. 7 employment contracts were sampled and found that terms and conditions of the employment were clearly stated in the contract and signed by the workers. Sample of contact agreement and payslip (Month of Sept 2022, Nov 2022 and Mar 2023) was verified as below:</p> <ol style="list-style-type: none"> 1. Employee No: E00066 2. Employee No: E00160 3. Employee No: E00002 4. Employee No: E00156 5. Employee No: E00127 	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p>- Major compliance -</p>	<p>The mill management has implemented punch card system to monitor the working hours and overtime of the workers. All the records were transparent to the workers. The workers were paid as per Sabah Ordinance for the overtime carried out. This has confirmed through interview with the workers. Sample of contact agreement and payslip (Month of Sept 2022, Nov 2022 and Mar 2023) was verified as below:</p> <ol style="list-style-type: none"> 1. Employee No: E00066 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		2. Employee No: E00160 3. Employee No: E00002 4. Employee No: E00156 5. Employee No: E00127	
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. - Major compliance -	Interview with the workers confirmed that they have rest time in between of the working hours. Overtimes were paid according to the rate stated in the agreement and regulatory requirements. The overtime offered upon mutually agreement.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Wages and overtime were paid according to Sabah Ordinance and punch card of the workers. Total hours of overtime and daily attendance has recorded in the Lintramix System and the pay slips. Refer to indicator 4.4.5.3.	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. - Minor compliance -	All the workers are provided with free medical facilities. Free housing facilities were provided to all the workers and their families. Free transport to send the children of the workers to school. Place of worship was available in the compound of estate for all the workers and their family members.	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	The mill management has provided free housing facilities to all the workers. Basic amenities such as water and electricity were provided to the workers. Line-site inspection was carried out on weekly basis by the Estate Hospital Assistant. Based on verification of the inspection records, any issues identified were recorded and appropriate actions were taken accordingly. Latest	Major Nonconformity

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Criterion / Indicator	Assessment Findings	Compliance																				
	<p>inspection record sighted on 29/05/2023, 22/05/2023, 16/05/2023 and 08/05/2023.</p> <p>Monitoring of drinking water analysis has been conducted on quarterly basis as per plan. Analysis was conducted by appointed lab DYNAKEY Laboratories Sdn Bhd. Refer details below 2022:</p> <table border="1" data-bbox="1088 608 1848 906"> <thead> <tr> <th>Quarter</th> <th>Date</th> <th>Ref. No.</th> <th>Lab Ref. No.</th> </tr> </thead> <tbody> <tr> <td>Q1 2022</td> <td>22/02/2022</td> <td>GJOM/DYK/2 2/01/001</td> <td>W220120/01</td> </tr> <tr> <td>Q2 2022</td> <td>28/05/2022</td> <td>GJOM/2022/ 04/04</td> <td>W220426/03</td> </tr> <tr> <td>Q3 2022</td> <td>23/08/2022</td> <td>GJOM/DYK/2 2/07/003</td> <td>W220719/01</td> </tr> <tr> <td>Q4 2022</td> <td>07/11/2022</td> <td>GJOM/DYK/2 2/10/004</td> <td>W221017/01</td> </tr> </tbody> </table> <p>Nevertheless, the line site inspection was not effectively implemented. Evidence as verified below.</p> <p>During site visit at Mill Linesite compound it was observed at (Temporarily Contractor House and House no. F1) that 3 units of empty lubricant containers were used for domestic purpose, 2 unit of petrol was stored in the container without label. Linesite inspection was conducted on weekly basis by Hospital Assistant however reference with "Rekod Pemeriksaan Mingguan Perumahan" dated 07/06/2023 and 29/05/2023 stated as no issue at Section 6 "Bahan Buangan Terjadual" and not reflected with actual condition. Due to reoccurrence of previous minor nonconformity in the same indicator, it has been escalated to Major Nonconformity.</p>	Quarter	Date	Ref. No.	Lab Ref. No.	Q1 2022	22/02/2022	GJOM/DYK/2 2/01/001	W220120/01	Q2 2022	28/05/2022	GJOM/2022/ 04/04	W220426/03	Q3 2022	23/08/2022	GJOM/DYK/2 2/07/003	W220719/01	Q4 2022	07/11/2022	GJOM/DYK/2 2/10/004	W221017/01	
Quarter	Date	Ref. No.	Lab Ref. No.																			
Q1 2022	22/02/2022	GJOM/DYK/2 2/01/001	W220120/01																			
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Q3 2022	23/08/2022	GJOM/DYK/2 2/07/003	W220719/01																			
Q4 2022	07/11/2022	GJOM/DYK/2 2/10/004	W221017/01																			

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.5.12 The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>Management unit established Social Policy dated 14/09/2020 and People Policy dated 03/08/2009 where physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited. Reproductive rights are protected. Briefing of the policy was conducted on 16/02/2023 to the workers during morning muster. Seen the training attendance list. Procedure on Prevention and Eradication of Sexual Harassment at the Workplace was established with Doc. No.: SMP-GPB-20, Rev. 0 dated 11/10/2013. Process of handling sexual harassment complaint was outlined in the procedure. Gender Committee was established in the estate and seen the last meeting was conducted on 20/01/2023. There was no case of sexual harassment and violence reported. Training for Sexual Harassment has been given 07/03/2023.</p>	<p>Complied</p>
<p>4.4.5.13 The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>There is no trade union in any of the visited estates. Nonetheless, there is also no restriction for them to join any trade union. This is recognized by the employer through establishment of people Policy dated 03/08/2009. However, there is a meeting conducted for workers on quarterly basis to discuss if there is any issue related to them. Refer "Minit Mesyuarat Ahli Jawatankuasa Kebajikan Genting Jambongan Oil Mill Bilangan 2" on 25/04/2023.</p>	<p>Complied</p>
<p>4.4.5.14 Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p>- Major compliance -</p>	<p>Children and young person were not employed or exploited. Based on the records in the employee's data base system, which has the information about date of birth and date join, there was no children and young person being employed.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance																					
Criterion 4.4.6: Training and competency																							
4.4.6.1	<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>- Major compliance -</p>	<p>Genting Jambongan Oil Mill have established a training program for all workers based on the training need analysis conducted on a yearly basis.</p> <p>Records of trainings were maintained by the mill as below: -</p> <table border="1" data-bbox="1088 651 1850 1054"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Grading Training</td> <td>15/03/2023</td> </tr> <tr> <td>Lab Compost Plant Training</td> <td>15/03/2023</td> </tr> <tr> <td>HIRARC Training</td> <td>16/03/2023</td> </tr> <tr> <td>Work at Confined Space Training</td> <td>02/06/2023</td> </tr> <tr> <td>Working at Height Training</td> <td>03/06/2023</td> </tr> <tr> <td>Hearing Conservation Training</td> <td>03/06/2023</td> </tr> <tr> <td>Store, FFB Reception, Engine Room and Compost Plant SOP Training</td> <td>16/03/2023</td> </tr> <tr> <td>Environmental Control procedures – Water Treatment Training</td> <td>16/03/2023</td> </tr> <tr> <td>Scheduled Waste Training</td> <td>13/07/2023</td> </tr> </tbody> </table>	Training	Date	Grading Training	15/03/2023	Lab Compost Plant Training	15/03/2023	HIRARC Training	16/03/2023	Work at Confined Space Training	02/06/2023	Working at Height Training	03/06/2023	Hearing Conservation Training	03/06/2023	Store, FFB Reception, Engine Room and Compost Plant SOP Training	16/03/2023	Environmental Control procedures – Water Treatment Training	16/03/2023	Scheduled Waste Training	13/07/2023	<p>Complied</p>
Training	Date																						
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Scheduled Waste Training	13/07/2023																						
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>Genting Jambongan Oil Mill have conducted a meeting dated 27/12/2022 to discuss on the training needs of all workers for the year 2023. A training programme has been developed and available in the Training Need Analysis for 2023. The trainings were sighted to have also included Safety, Environment and Sustainability requirements.</p>	<p>Complied</p>																				
4.4.6.3	<p>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function</p>	<p>A training programme has been developed and available in the Genting Jambongan Oil Mill – ISCC/RSP0/MSPO Training Plan 2023, ESH Training Plan (Jan – Dec 2023) and QMS Training Plan</p>	<p>Complied</p>																				

Criterion / Indicator		Assessment Findings	Compliance
	and responsibility in accordance to the documented training procedure. - Minor compliance -	2023. The trainings were sighted to have also included Proposed person to attend, designations, intended scope of training, rationale of training planned, date, trainer and venue.	
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	Genting Plantations Berhad have established the Environmental Policy signed by the President and CEO dated 20/07/2017. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the mill. Latest policy briefing dated 12/02/2023 was verified. The Sustainability Department team is also committed in establishing various working standards through procedures or pictorial method to ensure environmental preservations in the operational practises.	Complied
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations - Major compliance -	The mill has established the environmental management plan and documented in Environment Improvement & Management Plan. The plan identifies the source of pollution, its negative impacts, improvement and mitigation plans, data required, monitoring and action plan, PIC, timeline, and its status. Among the pollution identified are air pollution (air particulate & Open Burning), Water pollution (Mill Operations and effluent & Ground water pollution from wastewater, septic tanks, or landfill), Noise pollution (traffic of machinery, mill operations), Soil Pollution (Oil Spillage and Leakage).	Complied

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		The mill has conducted the aspects and impacts analysis of all operations and documented in Genting Jambongan Oil Mill – Environmental Aspect and Impact Register (Doc Number: SP-MGR-02-F01-1) latest updated dated 03/05/2023.	
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -	The mill has established the Environmental Improvement & Management Plan which was available for verification. Sighted the implementation of the management plan as follows: <ol style="list-style-type: none"> 1. Reduction plans are in place to reduce air particulate emissions. 2. No burning policy has been established. 3. Location of major sources of water pollution are not within 1km of sensitive areas such as waterways, conservation areas or settlements. 4. Pollution control devices (PCD) are maintained and monitored regularly. 5. Safe temporary storage for mill waste by product are provided. 6. Measures to contained mill effluent are in place. 7. Desilting and desludging on land application area are done continuously. 	Complied
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	The mill has established program to promote the positive impacts and documented in Environmental Improvement & Management Plan as mentioned under indicator 4.5.1.3.	Complied
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards	The mill continuously provided awareness training to all employee on environmental policy, objectives, and management plan as per	Complied

Criterion / Indicator		Assessment Findings	Compliance																					
	achieving objectives. - Major compliance -	training plan established. Training record verified as stated in 4.4.6.1.																						
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	Regular meetings between the management and workers mainly done during daily morning muster rollcall to discuss any issue related to mill operations including environmental issue. Specific environmental issues were discussed during periodical Genting Jambongan Oil Mill – Environment Committee Meeting which was latest conducted on 28/04/2023.	Complied																					
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																								
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period. - Major compliance -	<p>The Mill maintains records of energy usage, which is reported monthly to head office. The use of the steam turbine for electricity generation has been optimized in order to reduce the dependence on diesel fossil fuel.</p> <p>Genting Jambongan Oil Mill has established baseline for non-renewable energy base on average of last 3 years usage/FFB produce. The monitoring of non-renewable energy usage was conducted annually.</p> <p>Sighted the sampled monitoring records for diesel and water per mt FFB usage at Genting Jambongan Oil Mill for 2023 as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Diesel (L/FFB)</th> <th>Water (m³/FFB)</th> </tr> </thead> <tbody> <tr> <td>Jun 2022</td> <td></td> <td>1.40</td> </tr> <tr> <td>Jul 2022</td> <td>21,994</td> <td>1.23</td> </tr> <tr> <td>Aug 2022</td> <td>25,076</td> <td>0.99</td> </tr> <tr> <td>Sep 2022</td> <td>24,388</td> <td>0.98</td> </tr> <tr> <td>Oct 2022</td> <td>23,363</td> <td>0.73</td> </tr> <tr> <td>Nov 2022</td> <td>24,204</td> <td>0.50</td> </tr> </tbody> </table>	Month	Diesel (L/FFB)	Water (m ³ /FFB)	Jun 2022		1.40	Jul 2022	21,994	1.23	Aug 2022	25,076	0.99	Sep 2022	24,388	0.98	Oct 2022	23,363	0.73	Nov 2022	24,204	0.50	Complied
Month	Diesel (L/FFB)	Water (m ³ /FFB)																						
Jun 2022		1.40																						
Jul 2022	21,994	1.23																						
Aug 2022	25,076	0.99																						
Sep 2022	24,388	0.98																						
Oct 2022	23,363	0.73																						
Nov 2022	24,204	0.50																						

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Criterion / Indicator		Assessment Findings				Compliance								
		Dec 2022	24,493	0.43										
		Jan 2023	25,036	1.19										
		Feb 2023	22,986	1.13										
		Mar 2023	26,247	1.02										
		Apr 2023	24,586	1.20										
		May 2023	27,408	1.03										
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>- Major compliance -</p>	<p>The mill estimates the usage of non-renewable energy (diesel) for genset and mobile machineries in annual budget as sighted in Genteng Jambongan Oil Mill Annual Budget FY 2023.</p> <p>The Estimation Diesel for 4 Years was available as below: Fossil Fuel Consumption Plan (L).</p> <table border="1"> <thead> <tr> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>306,700</td> <td>308,100</td> <td>308,993</td> <td>305,500</td> </tr> </tbody> </table>				2023	2024	2025	2026	306,700	308,100	308,993	305,500	Complied
2023	2024	2025	2026											
306,700	308,100	308,993	305,500											
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p>	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Apart from use of diesel for electricity, palm fiber and shells were also used to generate electricity through steam turbine and boiler.</p> <p>The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through steam turbine and boiler where Palm fibre and PK shells were used as renewable energy/fuel. Monthly records of energy consumption of non-renewable and renewable fuel per metric ton of palm product at the Mill were available.</p> <p><u>Monitoring of Renewable Energy Use (Fibre) 2023</u></p>				Complied								

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Criterion / Indicator		Assessment Findings			Compliance																				
		Month	Fibre (mt)	Shell (mt)																					
		Jan 2022	1,363.75	215.33																					
		Feb 2022	1,210.73	191.17																					
		Mar 2022	1,394.20	220.14																					
		Apr 2022	1,242.36	196.16																					
		May 2022	1,312.71	207.27																					
Criterion 4.5.3: Waste management and disposal																									
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>All waste products and sources of pollution was identified and documented in the Waste Management Plan dated 15/02/2023. The waste has been identified as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Source</th> <th>Types of Waste</th> </tr> </thead> <tbody> <tr> <td>Mill Processing</td> <td>Shredded Fibre, Slurry (DC), Boiler Ash, Boiler Clinker</td> </tr> <tr> <td>Workshop & Welding Shop</td> <td>Filters, Lubricants, Battery, Rags & Gloves</td> </tr> <tr> <td>Linesite</td> <td>Recyclable and Domestic Waste</td> </tr> <tr> <td>Vehicles</td> <td>Hydraulic Hose, Cylinders, Dismantled Equipments</td> </tr> <tr> <td>Office and Weighbridge</td> <td>Domestic and Recyclable Paper</td> </tr> <tr> <td>Diesel tank</td> <td>Scheduled Waste</td> </tr> <tr> <td>Chemical Store</td> <td>Container Boxes</td> </tr> <tr> <td>Lubricant Store</td> <td>Scheduled Waste</td> </tr> <tr> <td>Scheduled Waste Store</td> <td>Scheduled Waste</td> </tr> </tbody> </table>			Source	Types of Waste	Mill Processing	Shredded Fibre, Slurry (DC), Boiler Ash, Boiler Clinker	Workshop & Welding Shop	Filters, Lubricants, Battery, Rags & Gloves	Linesite	Recyclable and Domestic Waste	Vehicles	Hydraulic Hose, Cylinders, Dismantled Equipments	Office and Weighbridge	Domestic and Recyclable Paper	Diesel tank	Scheduled Waste	Chemical Store	Container Boxes	Lubricant Store	Scheduled Waste	Scheduled Waste Store	Scheduled Waste	Complied
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Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.3.2 A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <ul style="list-style-type: none"> 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. <p>- Major compliance -</p>	<p>SOP for scheduled waste management was established and available in the Genting Plantations Berhad Procedure Manual – Scheduled Waste Management; Doc Number: SMP-GPB-11; Revision: 02; Issue Date: September 2020.</p> <p>For scheduled wastes, the handling was done according to the legal requirement where a scheduled waste store was constructed in each operating unit for storage.</p> <p>The mill also has a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>Sighted the sampled of Scheduled Waste Disposal as below:</p> <ol style="list-style-type: none"> 1. SW 102 – Used Battery; Date: 12/06/2023; Consignment Note Number: 20230612168MLOZP; SW Contractor: Legenda Bumimas Sdn Bhd; Quantity: 0.0490 Mt. 2. SW 305 – Spent Lubricant Oil; Date: 12/06/2023; Consignment Note Number: 2023061216H7G6L4; SW Contractor: Legenda Bumimas Sdn Bhd; Quantity: 0.9000 Mt. 3. SW 306 – Spent Hydraulic Oil; Date: 12/06/2023; Consignment Note Number: 2023061216MVDJQL; SW Contractor: Legenda Bumimas Sdn Bhd; Quantity: 0.0940 Mt. 4. SW 322 – Waste of Non-Halogenated Organic Solvent; Date: 06/06/2023; Consignment Note Number: 2023060609AY6RSJ; SW Contractor: Legenda Bumimas Sdn Bhd; Quantity: 0.0125 Mt. 	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		5. SW 410 – Used Filter; Date: 06/06/2023; Consignment Note Number: 2023060609C5VJSD; SW Contractor: Legenda Bumimas Sdn Bhd; Quantity: 0.1810 Mt.	
4.5.3.3	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005 - Major compliance -	SOP for scheduled waste management was established and available in the Genting Plantations Berhad Procedure Manual – Scheduled Waste Management; Doc Number: SMP-GPB-11; Revision: 02; Issue Date: September 2020. The mill also has a proper Scheduled Waste Store for storing use chemical drums until time of disposal by DOE authorized waste disposal contractor. Disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. Sighted the sampled of Chemical Container Disposal as below: SW 409 – Container Contaminated with Scheduled Waste; Date: 06/06/2023; Consignment Note Number: 2023060609NOA9Q4; SW Contractor: Legenda Bumimas Sdn Bhd; Quantity: 0.0140 Mt.	Complied
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	Method of handling the domestic/general wastes is segregation at the collection point from offices and housing area before being disposed through Genting Jambongan Estate landfill.	Complied
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	An assessment plan for all identified polluting activities was established based on the Environment Aspect and Impact assessment. Polluting activities were monitored based on DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler	Complied

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Criterion / Indicator		Assessment Findings	Compliance												
		<p>stack sampling. Besides that, the mill also monitors the Green House Gas emission and recyclable waste.</p> <p>Observed the dust emission monitoring report conducted by Multi-Serve Sdn Bhd. as follows:</p> <table border="1"> <thead> <tr> <th>Descriptions</th> <th>Boiler No.1</th> <th>Boiler No.1</th> </tr> </thead> <tbody> <tr> <td>Date of Measurement</td> <td>26/07/2022</td> <td>23/12/2022</td> </tr> <tr> <td>Reference Number</td> <td>MS/GJOM/2022/ BOILER NO.1(S1) – 1ST HALF</td> <td>MS/GJOM/2022/ BOILER NO.1(S1) – 2ND HALF</td> </tr> <tr> <td>Dust Emission Load (mg/Nm³, dry, @ 12% CO₂)</td> <td>119.2 mg/m³</td> <td>108.0 mg/m³</td> </tr> </tbody> </table> <p>The emission level of Total Particulate matter @ 12% CO₂ for the boilers monitored were within the Standard limit based on DOE License (Ref: 005264)</p>	Descriptions	Boiler No.1	Boiler No.1	Date of Measurement	26/07/2022	23/12/2022	Reference Number	MS/GJOM/2022/ BOILER NO.1(S1) – 1ST HALF	MS/GJOM/2022/ BOILER NO.1(S1) – 2ND HALF	Dust Emission Load (mg/Nm ³ , dry, @ 12% CO ₂)	119.2 mg/m ³	108.0 mg/m ³	
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Dust Emission Load (mg/Nm ³ , dry, @ 12% CO ₂)	119.2 mg/m ³	108.0 mg/m ³													
4.5.4.2	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p>	<p>The mill has conducted assessment of all polluting activities in the Environmental Aspect Impact analysis. A management plan has been established based on the significant aspect and DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling. The plan was reviewed on annual basis.</p> <p>Verified the Pollutants and Greenhouse Gas (GHG) Emission – Reduction/Minimization Plan, dated 26/05/2023 as follows:</p> <ol style="list-style-type: none"> Air Pollution & GHG Emission – Running of Genset, Shovels, Tractors and Backhus Turner. GHG Emission (Diesel) – Fuel Consumption by Genset 	Complied												

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Criterion / Indicator		Assessment Findings	Compliance
		3. GHG Emission – POME 4. GHG Emission (Lubricants) – Lubricant Consumption 5. GHG Emission (Chemicals) – Chemical Usage by Mill	
4.5.4.3	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p>- Major compliance -</p>	<p>BOD of effluent is not regulated for Genting Jambongan Oil Mill. The mill is practicing zero discharge with conditions stipulated in its DOE license.</p> <p>Mill effluent is processed with EFB in a Compost Plant to produce compost where eventually applied in the field as fertiliser.</p>	Complied
Criterion 4.5.5: Natural water resources			
4.5.5.1	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill’s current activities. c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>Genting Jambongan Oil Mill has established and documented the water management plan in GJOM Water Management Plan for Raw Water and Drinking Water dated 15/02/2023.</p> <p>Sighted the implementation of the management plan as follows:</p> <ul style="list-style-type: none"> a. The mill monitors the water consumption on monthly basis. Water consumption monitored include firefighting, housing, boiler, and mill operation. The water consumption has been detailed out under indicator 4.5.2.1 b. Water for Domestic use is monitored on a quarterly basis in accordance with the Drinking Water Quality Standards. The latest domestic water sampling was conducted by Dynakey Laboratories Sdn Bhd on 20/01/2022 which indicated that all the parameters were within the stipulated limits. 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		c. Rainwater Harvesting is implemented in the mill housing complex where the rainwater is channelled to a drum for use of cleaning bathing especially during drought periods.	
4.5.5.2	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations. - Major compliance -	Not applicable as the mill does not discharge its POME into water course.	NA
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Mill Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Genting Jambongan Oil Mill has incorporated the established SOP of Genting Plantations Berhad as a guidance on the daily mill operations. Refer Genting Plantations Berhad – Sustainability Management Procedure Manual. The SOP covers all stations and operations in the mill.	Complied
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	Sustainability Department inspect and report on the operations on annual basis. The on-site managers develop Action Plans from the management plans for improvement of the operations. Review of Action Plans and site inspections confirmed consistent records of implementation of SOPs. This to ensure that performance is on track and best practices being consistently implemented.	Complied
Criterion 4.6.2: Economic and financial viability plan			

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4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	Business plan for 5 years has been established. Annual business plan is addressed in the form of annual budget and the projection for 5 years (2023-2027). It has the information about projected FFB received, CPO & PK production, finance allocations for processing, administration, maintenance, and capital expenditure.	Complied
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Pricing mechanisms for the products and other services were clearly written in the contract and purchase order. For CPO and PK transporter, fees of services are mentioned under Third Schedule under the contract agreement. For supplier, specific terms and conditions are mentioned under notes and conditions on the transport and payment documentation. For FFB suppliers, there is a policy agreement that shows the price calculation formula which is signed by the buyer and the seller. Based on the formula, among the factors taken into consideration are OER, MPOB average price (for CPO & PK), MPOB cess, Sabah's CPO sales tax and processing fees.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Payments to the contractors were found to be fair, legal, transparent, and made in a timely manner in accordance with the established contract agreements. So far there has been no complaints with regards to payments. Further confirmation was also obtained during stakeholders' consultation. The payments for FFB suppliers were also found to be made in timely manner i.e., not later than the 15 th day of the subsequent month.	Complied
Criterion 4.6.4: Contractor			

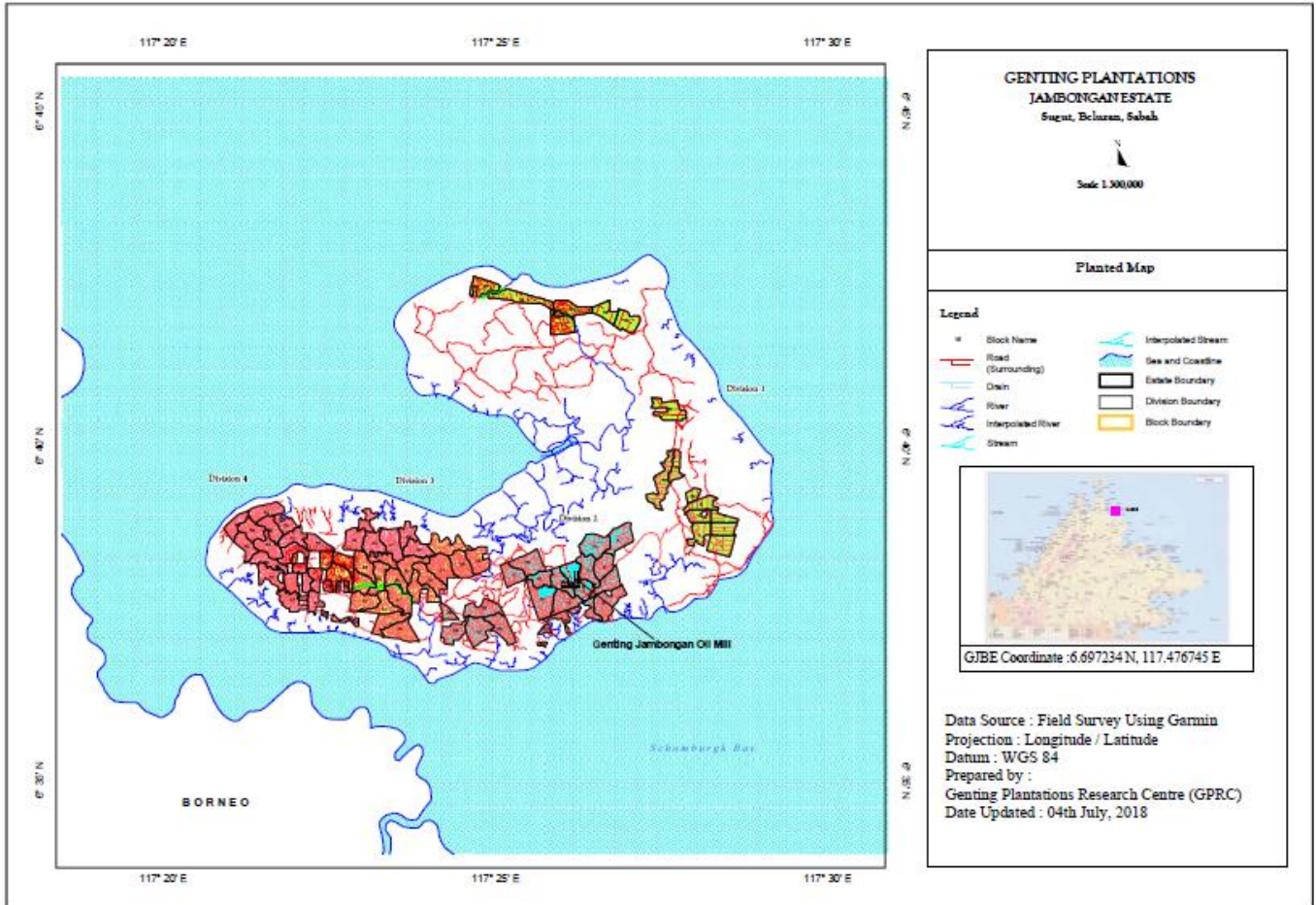
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4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	The mill did not engage any permanent contractor to work in the mill. Only based on project basis and there were no permanent workers engaged by the contractor. The only contractor involved was HXX HXXX EXXXXXXXXXX but handled under Genting Oil Mills (Sabah) Sdn Bhd, Kuala Lumpur for transport CPO and PK via barge. The contractor's engaged has signed agreement prior to providing services. There were clauses that state the contractors shall ensure compliance with the requirements of RSPO, ISCC, MSPO and OSHA 1994. The contractors have been briefed on MSPO management policies during stakeholder consultation training records were available for verification.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Sighted evidence of contract agreement HXX HXXX EXXXXXXXXXX for CPO & PK transport which is valid until 30/04/2025. The copy of agreement was kept by the mill management and verified during the assessment.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	Management unit has no objection to allow BSI auditors to verify the assessment through physical inspection if required. Clause 38 (e) of the agreement above has clearly mentioned that the transporter shall ensure to provide cooperation and relevant access to the appointed CB into their respective operations, systems and any all information, when this is announced in advance. The contractor has acknowledged on the addendum.	Complied

Appendix B: Smallholder Member Details

NA

Appendix C: Location and Field Map



Appendix D: List of Abbreviations

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