

MALAYSIAN SUSTAINABLE PALM OIL
MSPO OPMC Public Summary Report

- Initial Assessment
- Annual Surveillance Assessment (1_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 Sabapalm Oil Mill & Genting Sabapalm Estate
Date of Final Report: 04/12/2023

Report prepared by:
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Report Number: 3717734

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 Sabapalm Oil Mill	620051004000	29/02/2024
	Genting Sabapalm Estate	523495002000	30/09/2023
Address	Headquarter 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		
Website	https://www.gentingplantations.com	E-mail	arunan.kandasamy@genting.com
			james.chung@genting.com
Telephone	+603 2333 6510	Facsimile	+603 2333 6575

1.2 Certification Information			
Certificate Number	Mill: MSPO 689067 Estate: MSPO 689068	Certificate Start Date	04/07/2019
Date of First Certification	04/07/2014	Certificate Expiry Date	03/07/2024
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	<ul style="list-style-type: none"> Determination of the conformity of the client's management system, or parts of it, with audit criteria. 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	N/A (The certification unit is RSPO certified)		
Recertification Assessment Visit Date (RAV 1)	13 - 15/03/2019		
Continuous Assessment Visit Date (CAV) 1	09 - 10/07/2020		
Continuous Assessment Visit Date (CAV) 2	03 - 04/06/2021		
Continuous Assessment Visit Date (CAV) 3	11 - 14/04/2022		
Continuous Assessment Visit Date (CAV) 4	10 - 13/07/2023		

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1.3 Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE119-60223799	International Sustainability and Carbon Certification (EU)	ASG Cert GmbH	31/12/2023
MSPO 716641	MSPO Supply Chain Certification Standard	BSI Services Malaysia Sdn Bhd	07/10/2024
RSPO 653477	RSPO P&C 2018 for the Production of Sustainable Palm Oil; Malaysia National Interpretation 2019	BSI Services Malaysia Sdn Bhd	27/09/2027

1.4 Location of Certification Unit			
Name of the Certification Unit (Palm Oil Mill/Estate/Smallholder/Independent Smallholder)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Genting Sabapalm Oil Mill	KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia	5° 57' 54.29" N	117° 22' 26.98" E
Genting Sabapalm Estate	KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia	5° 57' 54.29" N	117° 22' 26.98" E

1.5 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Sabapalm Estate	3,947.20	8.91	402.47	4,358.58	90.56
Total (ha)	3,947.20	8.91	402.47	4,358.58	

1.6 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Sabapalm Estate	942.08	892.62	1,616.59	495.91	0	3,005.12	942.08
Total (ha)	942.08	892.62	1,616.59	495.91	0	3,005.12	942.08

1.7 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Aug 22 - Jul 23)	Actual (Apr 22 - Jun 23)	Forecast (Aug 23 - Jul 24)

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Genting Sabapalm Estate	104,527.00	103,832.61	97,833.00
Smallholder	0	25,894.97	27,188.00
Total (mt)	104,527.00	129,727.58	125,021.00

1.8 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Aug 22 - Jul 23)	Actual (Apr 22 - Jun 23)	Forecast (Aug 23 - Jul 24)
Smallholders	23,000.00	2,149.51	2,256.00
Total (mt)	23,000.00	2,149.51	2,256.00

1.9 Certified Tonnage

	Estimated (Aug 22 - Jul 23)	Actual (Apr 22 - Jun 23)	Forecast (Aug 23 - Jul 24)
	FFB	FFB	FFB
Mill Capacity: 20 MT/hr	104,527.00	129,727.58	125,021.00
	CPO (OER: 21.00%)	CPO (OER: 20.34%)	CPO (OER: 20.80%)
SCC Model: MB	21,950.00	26,389.85	26,000.00
	PK (KER: 4.10%)	PK (KER: 3.90%)	PK (KER: 4.00%)
	4,285.00	5,055.33	5,000.00

1.10 Actual Sold Volume (CPO)

CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
26,389.85	0	13,958.93	5,187.90	1,929.31	21,076.14

1.11 Actual Sold Volume (PK)

PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
5,055.33	0	0	3,846.57	124.16	3,970.73

Section 2: Assessment Process

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

Assessment Methodology, Programme, Site Visits

This on-site reassessment was conducted from 10-13/07/2023. An approval has been received by MPOCC on audit extension dated on 29/3/2023. The audit programme is included as Section 2.4. The approach to the audit was to treat the Genting Sabapalm Oil Mill and Sabapalm Estate as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-2:2013, 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 was not using MSPO certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSPO Logo and related claims.

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

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

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

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

All the previous nonconformities are remains closed. The assessment findings from the reassessment is detailed in Section 4.2. The Major NC were close out offsite due to evidence submitted were sufficient.

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

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

Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Genting Sabapalm Oil Mill	✓	✓	✓	✓	✓
Genting Sabapalm Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: July 8, 2024 - July 11, 2024

Total No. of Mandays: 7.0

2.1 BSI Assessment Team

Team Member Name	Role	Qualifications
Valence Shem (VSH)	Team Leader	<p>Education: BTech (Hons) Bachelor’s Degree in Industrial Technology, University of Science Malaysia.</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1) 9 years working experience in oil palm plantation industry. 2) Management system auditing since 2009 for various standards such as ISO 14001, RSPO P&C, RSPO SCCS, MSPO and SMETA. <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 14001 Lead Auditor Course 2) ISO 9001 Lead Auditor Course 3) Endorsed RSPO P&C Lead Auditor Course 4) Endorsed RSPO SCCS Lead Assessor Course 5) MSPO Awareness Training 6) ISO 45000 Lead Auditor Course 7) SMETA Auditor training 8) HCV-HCS training 9) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course <p>Aspect covered in this audit:</p>

		<p>Legal, social aspects, employees' welfare, and stakeholders' consultations & communications.</p> <p>Language proficiency: English and Bahasa Malaysia.</p>
Muhamad Naquiddin Mazeli (MNM)	Team Member	<p>Education: Bachelor of Science Horticulture at University Putra Malaysia.</p> <p>Work Experience: 11 years working experience in oil palm plantation industry as sustainability team – managing, implementing and monitoring of RSPO, ISCC, MSPO and ISO9001 and ISO 18001 certification requirements for estates, mills, refineries and smallholders. He also supports in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company. He is a trained as, ISO 9001, ISO 45001 and already attend HCV training with Proforest.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1) Safety and Health Officer 2) Food Safety System (FSSC and ISO 22000) for mill and refineries 3) ISO 9001 Lead Auditor Course 4) ISO 45000 Lead Auditor Course 5) Endorsed RSPO P&C Lead Auditor Course 6) Endorsed RSPO SCCS Lead Assessor Course 7) MSPO Awareness Training 8) SMETA Auditor training 9) HCV-HCS training 10) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course <p>Aspect covered in this audit: Legal, mill and estates best practices, OHS, long-term economic viability, traceability, biodiversity, wastes management, and environment.</p> <p>Language proficiency: English and Bahasa Malaysia.</p>

2.2 Impartiality and conflict of interest

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

2.3 Accompanying Persons

No.	Name	Role
1	Faridah Shahidin	Representing the Department of Standards Malaysia (DSM) to witness the process of the assessment.
2	Nor Faizah Azizan	Representing BSI to observe the process of the assessment.

2.4 Assessment Plan

The assessment plan was sent to the client prior to the assessment.

Date	Time	Subjects	VSH	MNM
Monday 10/07/2023	0830-0900	Opening meeting: <ul style="list-style-type: none"> Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation). 	✓	✓
	0900-1300	<u>Genting Sabapalm Estate</u> 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, wastes management, workers housing, clinic, Landfill, etc. and stakeholder consultation.	✓	✓
	1300-1400	Lunch break	✓	✓
	1400-1630	<u>Genting Sabapalm Estate</u> Document review P1 – P7 (MSPO Part 3): 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 briefing	✓	✓
Tuesday 11/07/2023	0900-1300	<u>Genting Sabapalm Estate</u> Continue with field visit and stakeholder consultation	✓	✓
	1300-1400	Lunch break	✓	✓
	1400-1630	<u>Genting Sabapalm Estate</u> Continue with document review P1 – P7 (MSPO Part 3)	✓	✓
	1630-1700	Interim closing briefing	✓	✓
Wednesday 12/07/2023	0900-1300	<u>Genting Sabapalm Oil Mill</u> 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. and stakeholder consultation.	✓	✓
	1300-1400	Lunch break	✓	✓
	1400-1630	<u>Genting Sabapalm Oil Mill</u> 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 briefing	✓	✓

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Date	Time	Subjects	VSH	MNM
Thursday 13/07/2023	0900-1100	<u>Genting Sabapalm Oil Mill</u> Continue with outstanding elements.	✓	✓
	1100-1200	Audit team discussion & preparation for closing meeting.	✓	✓
	1200-1300	Closing meeting	✓	✓

Section 3: Assessment Findings

3.1 Details of audit results

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

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

3.2 Details of Nonconformities and Opportunity for improvement

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

During the reassessment there were five (5) Major & zero (0) Minor nonconformities and five (5) OFI raised. The 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 #:	2366501-202307-M1	Issue Date:	13/07/2023
Due Date:	11/10/2023	Date of Closure:	11/10/2023
Area/Process:	Genting Sabapalm Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3 - 4.3.1.4 Major Escalation from previous Minor NC #2188014-202204-N1
Requirements:	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.		
Statement of Nonconformity:	The monitoring of compliance to applicable legal requirement by a supplier was not effectively implemented.		
Objective Evidence:	1) During the site verification at the estate's sundry shop (Kedai Runcit Nuryani) in Bangkawat Division, it was found that the shop is storing and selling LPG without any permit/approval from the respective authority. 2) GSPE has established an application form for opening a stall during night market ("tamu") organised inside the premise and the application must be approved by the management. Based on the security gate's registration logbook of visitors, there were 32 sellers allowed to come in and set up their stalls during the latest "tamu" on 07/07/2023. However, only 2 of them had the documented approval from the management, but there was no evidence to show that the 2 sellers are holding valid trading license. This is not in-line with GSPE's documented "Syarat Kebenaran Berniaga" (Terms to Trade), Clause no. 1 which		

	reads " <i>Hendaklah mempunyai lesen berniaga yang sah</i> " (Must possess a valid trading license).
Corrections:	<ol style="list-style-type: none"> 1. Immediate meeting with sundry shop operators has been held on 13/7/2023. All of them has been given written reminder to settle their cylinder gas (LPG) permit within one (1) month from the date of the letter issued. They also required to submit their copy of valid selling cylinder gas (LPG) permits to estate management for physical verification on 14/8/2023. They will not be allowed to continue operating their business if their cylinder gas (LPG) permit not complied as per Tenancy Agreement after verification. 2. Estate to review the terms stated in application form for opening a stall during night market organised inside the estate for the next month 'tamu'.
Root cause analysis:	<ol style="list-style-type: none"> 1. Even though awareness briefing and meeting with sundry shop operator has been conducted since last year 2022, no thoroughly physical inspection has been conducted to monitor the compliance of legal requirement of all sundry shop operator. 2. The term to trade in the application form for opening a stall during night market organised inside the estate was not reviewed since the tamu 'reopened' after covid19 pandemic.
Corrective Actions:	<ol style="list-style-type: none"> 1. By maintaining a record checklist, The PIC (Estate CC) will monitor the sundry shop operator tenancy agreement compliance on a yearly basis during the renewal of contract. If the sundry shop found not complied with the legal requirements and tenancy agreement, the contract will not renew and new tender issued. 2. Estate to conduct awareness briefing to sundry shop operators on the current requirements or any update of Tenancy Agreement. 3. Estate to ensure only relevance terms to be included in the revised application form for opening stall inside estate. Every time sellers enter the estate they will be required to read and sign the terms of agreement for opening a stall, if they accept the terms then they will be allowed to operate. Auxiliary Police will be provided with the name list of sellers who have agreed and signed the terms of agreement for monitoring purposes.
Assessment Conclusion:	<p>Evidence verified:</p> <ol style="list-style-type: none"> 1) Checklist template entitled "<i>Borang pemeriksaan Kawasan premis keda!</i>" (Tenancy Agreement Checklist) that shows the tenants compliance with legal and tenancy agreement is checked by the PIC. Possession of trading license and selling of petrol & gas permit are among the criteria included in the checklist. Based on the completed checklist dated 23/08/2023 for Kedai Runcit Nuryani, the shop is no longer selling LPG. Thus, permit to store and sell LPG is no longer required. 2) Attendance record dated 13/07/2023 that shows the tenants have been briefed on the needs to comply with the tenancy agreement requirements. 3) Latest version of the company's Terms to Trade where the requirement for a trader to possess trading license has been repealed. 4) Latest version of the "Borang Kebenaran Berniaga" where the acknowledgement by the applicant is included that they understand about the terms to trade at the night market.

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	The evidence of correction and corrective actions implementation was found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment.
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Non-Conformity Report			
NCR Ref #:	2366501-202307-M2	Issue Date:	13/07/2023
Due Date:	11/10/2023	Date of Closure:	11/10/2023
Area/Process:	Genting Sabapalm Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3 - 4.4.4.2 Major
Requirements:	<p>The occupational safety and health plan shall cover the following:</p> <ul style="list-style-type: none"> 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. 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. 		
Statement of Nonconformity:	Found the occupational safety and health plan was not properly implemented.		
Objective Evidence:	<ul style="list-style-type: none"> 1) Store Upkeep Standard Procedure (GENP/SOP/00/005) dated 11/10/2022 under 6.3.3 stated to ensure all Safety Data Sheet is available at storage and updated. However, verification on site at water treatment plant area, there was no Safety data sheet for all chemicals such as chlorin, alum, and lubricant oil that been stored. It was also found that the bund system for water treatment plant chemical storage was not available. 2) Sighted during site verification a yellow lotion in 1st Aid box at water treatment plant area was expired on 04/23. 		
Corrections:	<ul style="list-style-type: none"> 1. To conduct periodically inspection to ensure all SDS is available and other safety requirement are in place as per SOP at water treatment plant area at all times. 2. To provide a proper spillage container for each chemical inside the plant. 3. To ensure the PIC of the water treatment plant are well briefed and aware of the expiry date of all material inside the 1st Aid Box. 		
Root cause analysis:	<ul style="list-style-type: none"> 1. The SDS was kept by the water treatment plant operator instead of properly displayed the SDS inside the water treatment plant. 2. Lack of knowledge of PIC to ensure all chemical is provided with proper spillage container, estate management had a lack of knowledge on the requirement of the bund system for the water treatment plant. 3. Lack of awareness of PIC to inspect the expiry date of the material inside the 1st Aid Box. 		
Corrective Actions:	<ul style="list-style-type: none"> 1. Estate will include the water treatment plant as an area of inspection during the coming OSH inspection (2nd and 3rd OSH Committee Meeting) on respective area as well as training to the estate PIC regarding on the SOP of the water treatment plant to ensure PIC understand the requirements. 2. Estate Clinic personnel (HA) to include awareness briefing to all 1st Aid Box personnel while conducting 1st Aid Box monthly inspection. 		

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Assessment Conclusion:	<p>Evidence verified:</p> <ol style="list-style-type: none"> 1) Pictorial workplace inspection report dated 23/08/2023 that shows the SDS and secondary containment for chemical have been made available at the water treatment plant. 2) Training record dated 25/07/2023 that shows the PIC of the water treatment plant have been retrained on the SOP. 3) Training record dated 08/09/2023 that shows all the PIC of first aid kit have been retrained about the type of items in the first aid kit including their use and expiry dates. 4) Pictures that show the expired yellow lotion has been replaced. The expiry date of the new one is 06/24. <p>The evidence of correction and corrective actions implementation was found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment.</p>
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Non-Conformity Report			
NCR Ref #:	2366501-202307-M3	Issue Date:	13/07/2023
Due Date:	11/10/2023	Date of Closure:	11/10/2023
Area/Process:	Genting Sabapalm Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3 - 4.4.5.3 Major
Requirements:	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.		
Statement of Nonconformity:	The wage of a worker was found to be not meeting the MWO 2022.		
Objective Evidence:	Based on the pay slip of a worker (employee's ID: E00859) for the month of June 2023, it was found that the average earning per day was RM55.07/day which did not meet the MWO 2022 i.e., RM57.69/day.		
Corrections:	The wages of respective worker will be top up in July 2023 according to MWO 2022.		
Root cause analysis:	Lack of monitoring and documentation of the productivity of the respective worker on daily basis.		
Corrective Actions:	Estate management will ensure all productivity of farm tractor driver to be monitored efficiently by proper work arrangement especially during low crops as well as recording on a daily basis in a "Daily Minimum Wages Form" that will be created by the estate management team.		
Assessment Conclusion:	<p>Evidence verified:</p> <ol style="list-style-type: none"> 1) Pay slip for the month of July 2023 that shows the wage has been topped up. 2) The "Daily Productivity Monitoring & Top Up Eligibility Form" for the month of August 2023, which has been utilised to monitor the daily productivity. The form has the information about the daily targeted productivity, achieved productivity, and justification if top-up wage is not eligible. 		

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	The evidence of correction and corrective actions implementation was found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment.
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Non-Conformity Report			
NCR Ref #:	2366501-202307-M4	Issue Date:	13/07/2023
Due Date:	11/10/2023	Date of Closure:	11/10/2023
Area/Process:	Genting Sabapalm Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3 - 4.5.3.3 Major
Requirements:	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.		
Statement of Nonconformity:	Waste generated from the plantation operation was not appropriately disposed as per Sustainability Management Procedure Manual (Scheduled waste).		
Objective Evidence:	<p>The management already establish the standard procedure for Scheduled waste as per Doc no: SMP-GPB-11 rev: 2 dated September 2020. However, the during verification of the implementation, sighted:</p> <ul style="list-style-type: none"> a) Scheduled waste items empty lubricant oil container being disposed at landfill area at Block 93. b) Contaminated rags in the dustbin at workshop area. c) The oil trap at Scheduled waste area, sighted contaminated soil from oil trap was disposed on an open ground at the side of the oil trap and not disposed as scheduled waste procedure. 		
Corrections:	<ul style="list-style-type: none"> 1. Immediate action has been taken to collect and segregate the waste from the landfill area. 2. Immediate training to the estate PIC and collectors has been conducted to improve their awareness on domestic waste management. 3. Immediate training to the estate PIC and workers working in workshop and schedule waste area on the schedule waste management. 4. The contaminated rags in the dustbin at workshop area has been collected and sent to schedule waste store. 5. The contaminated soil from oil trap which was disposed on the open ground at the side of the oil trap has been contained with sand, collected and sent to schedule waste store as per procedure. 		
Root cause analysis:	<ul style="list-style-type: none"> 1. No proper monitoring from estate management and lack of awareness of the waste collector regarding the landfill management. 2. Lack of knowledge of the workshop and schedule waste store personnel on the schedule waste management. 		
Corrective Actions:	<ul style="list-style-type: none"> 1. The Landfill will be included as 1 of workplace inspection during estate OSH committee meeting to ensure the compliance. 2. Training regarding schedule waste management to the workshop and schedule waste personnel will be conducted on twice a year to increase the awareness of the workers on the SOP. 		

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	3. Training regarding domestic waste management also will be conducted to all workers to improve their knowledge of the landfill management.
Assessment Conclusion:	<p>Evidence verified:</p> <ol style="list-style-type: none"> 1) Before & after pictorial workplace inspection report that shows the lubricant container has been removed from the landfill. 2) Attendance record dated 12/07/2023 that shows training on wastes (domestic, recyclable and scheduled) management has been given to the relevant employees. <p>The evidence of correction and corrective actions implementation was found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment.</p>

Non-Conformity Report			
NCR Ref #:	2366501-202307-M5	Issue Date:	13/07/2023
Due Date:	11/10/2023	Date of Closure:	11/10/2023
Area/Process:	Genting Sabapalm Palm Oil Mill	Clause & Category: (Major / Minor)	MSPO 2530 Part 4 - 4.3.1.1 Major
Requirements:	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.		
Statement of Nonconformity:	Sighted the operation was not in compliance with the legal and other requirement.		
Objective Evidence:	<ol style="list-style-type: none"> 1) As per Industrial Code of Practice for Safe Working in a Confined Space 2010 under clause 11: Health requirement of persons working in confined space stated that, "The employer shall ensure that his authorised entrant intending to work in confined space are certified physically and mentally fit determined by an occupational health doctor". However, it was found that no record of health declaration for two workers that had been assigned to enter the confined space (Kernel Bunker) as per PTW implementation dated 05/02/2023 Kernel bunker cleaning. 2) As per Jadual Pematuhan under No 005261 under clause 16, stated that "Pengawasan kualiti air sungai yang terletak berhampiran dengan kilang hendaklah dijalankan dengan mengadakan 2 takat percontohan (dipersetujui oleh Jabatan Alam Sekitar) iaitu di hulu dan di hilir takat pelepasan efluen pada setiap bulan bagi pelepasan alur air". However, the sampling points has yet to be endorsed by the DOE as per requirement. 		
Corrections:	<ol style="list-style-type: none"> 1) Appoint the OHD to do a health check on all the trained AESP & AGTES. 2) Send a letter seeking approval on the sampling points to DOE. 		
Root cause analysis:	<ol style="list-style-type: none"> 1) Management was aware of the health declaration by the workers entering the Confined Space but was not aware of the health declaration by OHD. 2) Management was not aware of the requirement of the sampling points to be approved by DOE. 		
Corrective Actions:	<ol style="list-style-type: none"> 1) Due to frequent changes in the mill management team, dedicated PIC at regional office have been appointed to monitor mills permits, legal requirements as well as KB compliance and update any changes if any. 		

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	2) To check on the new Jadual Pematuhan and log the requirements onto the legal register for monitoring.
Assessment Conclusion:	<p>Evidence verified:</p> <ol style="list-style-type: none"> 1) Summary Report Health Examination for Confined Space by an OHD (reg. #HQ/19/DOC/00/003999) dated 11/08/2023 that shows all the AESP & AGTES have been examined. The report has the information about the results of spirometry and ECG status. Should there be any unfit condition of the employees, the OHD will state his recommendation for the next course of action. 2) A letter dated 13/07/2023 to the Dept. of Environment (DOE) to seek approval for the upstream and downstream sampling points. A map to show the sampling points was also attached to the letter. 3) Pictorial records that show the DOE personnel has paid a visit to the sampling points locations on 02/08/2023. 4) The updated Job Description document, dated 07/07/2023 for ESH Supervisor that shows the ESH Supervisor is the dedicated PIC to monitor the regulatory compliance for the mill. 5) The updated legal register that shows the new Jadual Pematuhan conditions have been included. <p>The evidence of correction and corrective actions implementation was found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment.</p>

Opportunity For Improvement			
Ref:	2366501-202307-I1	Clause:	MSPO 2530 Part 3 - 4.4.5.6
Area/Process:	Genting Sabapalm Estate		
Objective Evidence:	The effective date stated in the employment contract of foreign workers can be further improved to harmonise with the work pass effective date.		

Opportunity For Improvement			
Ref:	2366501-202307-I2	Clause:	MSPO 2530 Part 4 - 4.4.2.2
Area/Process:	Genting Sabapalm Palm Oil Mill		
Objective Evidence:	The recording of complaints which were received through verbal can be further improved by registering them in the "Complaints/Grievance and Enquiry Record Book", therefore the progress of action taken can be effectively monitored and followed up.		

Opportunity For Improvement			
Ref:	2366501-202307-I3	Clause:	MSPO 2530 Part 4 - 4.4.4.2
Area/Process:	Genting Sabapalm Palm Oil Mill		
Objective Evidence:	To enhance the training for first aid box and ensure all first aider was competent to handle the emergency and first aid box properly.		

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Opportunity For Improvement			
Ref:	2366501-202307-I4	Clause:	MSPO 2530 Part 4 - 4.4.5.8
Area/Process:	Genting Sabapalm Palm Oil Mill		
Objective Evidence:	The written agreement between the mill and the female employees with regards to working at night can be further improved by stating more details such as the time defined under "working at night" and date of agreement signed.		

Opportunity For Improvement			
Ref:	2366501-202307-I5	Clause:	MSPO 2530 Part 4 - 4.4.5.11
Area/Process:	Genting Sabapalm Palm Oil Mill		
Objective Evidence:	The availability of the fire extinguishers at the workers quarters can be further improved especially during the period they are handed over to the service provider (vendor) for maintenance.		

Noteworthy Positive Comments	
1	Good cooperation by management team/staff/sustainability team.
2	Good documentation upkeep and retrieval.
3	Good housekeeping at working places e.g., workshop, storage, mill operation areas, etc.

3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
NCR Ref #:	2188014-202204-M1	Issue Date:	14/04/2022
Due Date:	13/07/2022	Date of Closure:	16/06/2022
Area/Process:	Genting Sabapalm Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3 - 4.4.4.2 Major
Requirements:	The occupational safety and health plan shall cover the following: b. The risks of all operations shall be assessed and documented.		
Statement of Nonconformity:	Safety Work Procedure established was not effectively implemented.		
Objective Evidence:	During site verification at Bengkawat Complex, the air compressor store was unlocked and without any safety procedures and measures. This aspect has not been identified and evaluated in the HIRARC dated 25/01/2022 for the necessary action and mitigation plan.		
Corrections:	To allocate the current store as dedicated air compressor store with proper safety measure such as locked all time, display SOP and the person in-charge train regarding the air compressor operation SOP. This site will be included into workplace inspection area prior to OSH committee meeting.		

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Root cause analysis:	The estate management was not conducting Safety and Health inspection during the workplace inspection at this site resulting lack of awareness and competency to the appointed person.
Corrective Actions:	Estate to ensure training programme for the air compressor usage & maintenance included into the estate annual training programme.
Assessment Conclusion:	<p>Verified on the evidence submitted as below:</p> <ol style="list-style-type: none"> 1) Training on Air Compressor was conducted on 28/5/2022 at Bengkawat Division, Parking Bay attended by 40 personnel comprising Executives, Staffs, Drivers and Workshop apprentice. Seen the training attendance and photo evident. 2) Sighted in 2022 Workers Training Programme that Air Compressor Training is one of the topics in the listing. 3) Standard Operation Procedure on handling of Air Compressor has been established, documented and display at the store. Seen, the SOP as evidence. 4) The new air compressor was seen locked, display with safety signages and Standard Operating Procedure. <p>All the corrective action and evidence of implementation were found to be adequate. The Major NC closed on 16/06/2022.</p>
Verification Statement	HIRARC dated 12/11/2022 already included air compressor in the risk assessment with the action control for each hazard. Referred HIRARC GENP/HIRARC/01/007. The management also produce new SOP for HIRARC review as referred OM-GPB-07 dated 01/12/2022.

Non-Conformity Report														
NCR Ref #:	2188014-202204-M2	Issue Date:	14/04/2022											
Due Date:	13/07/2022	Date of Closure:	16/06/2022											
Area/Process:	Genting Sabapalm Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3 - 4.4.5.8 Major											
Requirements:	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.													
Statement of Nonconformity:	The working hours for woman workers were not as per Section 75, Sabah Labour Ordinance													
Objective Evidence:	<p>Sabah Labour Department as per requirement in Section 75, Sabah Labour Ordinance.</p> <p>Reviewed the punch card records, work overtime form and workers request overtime form for the month of August 2021, November 2021 and February 2022 for workers with employment no E00606 and E11334 found that the woman workers were working at night more than 10.00 pm for date as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Employment no.</th> <th>Date</th> <th>Time off work</th> </tr> </thead> <tbody> <tr> <td rowspan="2">E00606</td> <td>09/08/2021</td> <td>23.52</td> </tr> <tr> <td>15/08/2021</td> <td>00.28</td> </tr> <tr> <td>E11334</td> <td>13/08/2021</td> <td>23.28</td> </tr> </tbody> </table>			Employment no.	Date	Time off work	E00606	09/08/2021	23.52	15/08/2021	00.28	E11334	13/08/2021	23.28
Employment no.	Date	Time off work												
E00606	09/08/2021	23.52												
	15/08/2021	00.28												
E11334	13/08/2021	23.28												

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		16/08/2021	23.02	
		13/02/2022	23.03	
Corrections:	The estate FFB dispatch clerk will be transfer from estate check-roll to the mill check-roll effective April 2022. Estate will reimburse the dispatch clerk based on the current rate paid by the mill for women working at night.			
Root cause analysis:	No monitoring conducted by the estate.			
Corrective Actions:	Estate will notify the mill if there is new recruitments for the FFB dispatch clerk in the future.			
Assessment Conclusion:	<p>Verified on the evidence submitted as below:</p> <p>The woman FFB dispatch Clerk has been transferred to Sabahan Palm Oil Mill as per letter with ref. no. GSPE/2022/04/056/THY/HS dated 14/04/2022.</p> <p>All the corrective action and evidence of implementation were found to be adequate.</p> <p>The Major NC closed on 16/06/2022.</p>			
Verification Statement	The mill is still maintaining its permit [ref.: JTKSBH/PMT/75/2022/0028, validity 23/09/2022 to 22/09/2024] to allow female workers to work after 10 p.m. Records of working hours of the two female dispatch clerks can be seen in the punch cards. The records since the last assessment were made available for verification. Thus, the Major non-conformity remains closed.			

Non-Conformity Report			
NCR Ref #:	2188014-202204-M3	Issue Date:	14/04/2022
Due Date:	13/07/2022	Date of Closure:	16/06/2022
Area/Process:	Genting Sabapalm Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3 - 4.5.3.2 Major
Requirements:	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for: a) Identifying and monitoring sources of waste and pollution.		
Statement of Nonconformity:	Waste generated from the plantation operation was not appropriately disposed.		
Objective Evidence:	Sighted during site verification, scheduled waste and non – scheduled waste items being disposed at non designated landfill area at Block 7, Thus, non-compliance to the Waste Management Plan dated 11/1/2022.		
Corrections:	<p>The following is the immediate action to rectify the issue.</p> <ol style="list-style-type: none"> 1) To collect and segregate the waste from the illegal landfill. 2) To close the illegal landfill. 3) To conduct training to the estate PIC and the appointed farm tractor driver regarding domestic waste management. 4) To erect signage to prohibit illegal waste dumping site along the boundary at prominent location. 5) To prepare landfill map for monitoring and for future references during replanting period. 		

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Root cause analysis:	No proper monitoring from the estate management and no training to the driver appointed as waster collector regarding the landfill management.
Corrective Actions:	Training regarding waste management to the staff and assistant will include the farm tractor driver as they are directly involved to ensure proper disposal implemented. Estate to conduct inspection and included the landfill management status into the estate environmental committee meeting.
Assessment Conclusion:	Verified on the evidence submitted as below: 1) Training on Domestic Waste Management was conducted on 14/4/2022 attended by 8 personnel comprising Executives, Staffs and Drivers. Seen the training attendance and photo evident. 2) Sighted the Minutes of Meeting, "Mesyuarat Khas Komiti Alam Sekitar Tahun 2022 – Audit Finding MSPO" dated 16/5/2022 attended by 8 personnel. The meeting discussed on action plan and mitigation plan on the non-conformity raised. 3) Evidence, Landfill or Solution Source map was established and indicate the landfill area. 4) Based on photo, the waste from illegal landfill being segregated and the said landfill being closed. Signboard being erected to prohibit illegal waste dumping site along the boundary. All the corrective action and evidence of implementation were found to be adequate. The Major NC closed on 16/06/2022.
Verification Statement	Sample in estate in Block 7 no sighted of non-designated landfill as per verification at field. The designated landfill was available at field 93. The Major NC was closed accordingly.

Non-Conformity Report			
NCR Ref #:	2188014-202204-M4	Issue Date:	14/04/2022
Due Date:	13/07/2022	Date of Closure:	16/06/2022
Area/Process:	Genting Sabapalm Oil Mill	Clause & Category: (Major / Minor)	MSPO 2530 Part 4 - 4.3.1.1 Major
Requirements:	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.		
Statement of Nonconformity:	The requirement in the Compliance Schedule for DOE license was not effectively implemented.		
Objective Evidence:	Environmental Audit was not conducted as per requirement by Department of Environmental under clause No 22 in the Schedule of Compliance, ASSH(B)31/152/000/014, License No; 005261.		
Corrections:	Proceed with approval after obtaining another quotation, approval obtain on 16th April and proceed to engage the best solution as our third-party auditor. The 1st audit done on 16th April and the 2nd audit schedule in Oct 2022.		
Root cause analysis:	Late in obtaining another quotation besides R X X consultancy as company required minimum 2 quotations.		

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Corrective Actions:	The auditor has been appointed to audit twice in 2022. This 3rd party audit will be listed in list of permit and licensing monitoring and new auditor will be appointed for 2023 if required.
Assessment Conclusion:	<p>Verified on the evidence submitted as below:</p> <ol style="list-style-type: none"> 1) Sighted, the Compliance Environmental Audit Report (1/2022) was conducted on 16/4/2022 by The Best Solution. 2) The Compliance Environmental Audit Report (1/2022) have been updated in the legal register. <p>All the corrective action and evidence of implementation were found to be adequate. The Major NC closed on 16/06/2022.</p>
Verification Statement	<p>(1/2023) – Environmental Compliance Audit Report by The Best Solution Management Sdn Bhd. Dated 16/05/2023. Report referred ASSH(B)31/152/000/014/Audit2023/1(005261)</p> <p>(2/2022) - Environmental Compliance Audit Report by The Best Solution Management Sdn Bhd. Dated 06/12/2022. Report referred ASSH(B)31/152/000/014/Audit2022/2(005261)</p> <p>However, found as per Industrial Code of Practice for Safe Working in a Confined Space 2010 under clause 11. Health requirement of persons working in confined space stated that the employer shall ensure that his authorised entrant intending to work in confined space are certified physically and mentally fit determined by an occupational health doctor. However, found no record of health declaration for 2 worker that enter the confined space (Kernel Bunker) as per PTW implementation dated 05/02/2023 Kernel bunker cleaning thus Major NC was raise during this audit.</p> <p>As per Jadual Pematuhan under No 005261 under clause 16. Stated Pengawasan kualiti air sungai yang terletak berhampiran dengan kilang hendaklah dijalankan dengan mengadakan 2 takat percontohan (dipersetujui oleh Jabatan Alam Sekitar) iaitu di hulu dan di hilir takat pelepasan efluen pada setiap bulan bagi pelepasan alur air. However, the sampling point for mill has yet to be endorsed by the DOE as per requirement thus noncompliance have been raised.</p>

Non-Conformity Report			
NCR Ref #:	2188014-202204-M5	Issue Date:	14/04/2022
Due Date:	13/07/2022	Date of Closure:	16/06/2022
Area/Process:	Genting Sabapalm Oil Mill	Clause & Category: (Major / Minor)	MSPO 2530 Part 4 - 4.4.4.2 Major
Requirements:	<p>The occupational safety and health plan should cover the following:</p> <ol style="list-style-type: none"> b) The risk of all operations shall be assessed and documented. 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 Labelling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. 		

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	h) Accident and emergency procedures shall exist, and instructions shall be clearly understood by all employees.
Statement of Nonconformity:	Safety Work Procedure and Safety and Health Management Plan established was not effectively communicated and implemented.
Objective Evidence:	<ul style="list-style-type: none"> b) No HIRARC being established on construction of 1 x 4 units elevated workers quarters. e) During site verification at Laboratory, the used Hexane was seen improper handling as per SOP (Safe work procedure) Document No: GSOM-SOP-LAB- 04, Reference No: 0 Dated 3/11/2010. f) Seen, water from Emergency shower at laboratory flowing into the monsoon drain and will be contaminated instead of being barricaded.
Corrections:	<ul style="list-style-type: none"> a) Establish a HIRARC and distribute and train construction workers on the HIRARC. b) Replace collection of used Hexane container from a 40-liter container to a 4 liter container so that it cannot contain too much amount of SW and is the risk is more manageable. c) Relocate the emergency shower and build a barricade for containment.
Root cause analysis:	<ul style="list-style-type: none"> a) Lack of monitoring and enforce before starting construction. b) Lab personnel did not follow SOP and collected used Hexane into a big quantity before sending to Schedule waste store. c) The emergency shower location is not appropriate as the wastewater directly flow into the monsoon drain.
Corrective Actions:	<ul style="list-style-type: none"> a) Prepare SOP for construction, not allow contractor to start construction if SOP not fulfilled. b) Retrain workers on the SOP. Change practice to collect used Hexane and send to SW store daily. c) To conduct training to the laboratory personnel regarding the emergency shower and its maintenance.
Assessment Conclusion:	<p>Verified on the evidence submitted as below:</p> <ul style="list-style-type: none"> 1) Training on Handling Used Chemical and Emergency Shower was conducted on 17/5/2022 attended by 3 personnel. Seen the training attendance and photo evident. 2) Evidence through photo, the barricade was built by Management at Emergency Shower area as containment. <p>All the corrective action and evidence of implementation were found to be adequate. The Major NC closed on 16/06/2022.</p>
Verification Statement	From the verification with document and on site, the HIRARC was updated with all activities in Mill included with construction for workers housing and EFB yard. The used hexane has been properly stored and available at scheduled waste store accordingly to SOP (Safe work procedure) Document No: GSOM-SOP-LAB- 04, Reference No: 0 Dated 3/11/2010. At lab verification on Lab found that the water was been barricade and collected. No recurrence issue found, and NC was close accordingly.

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Non-Conformity Report			
NCR Ref #:	2188014-202204-N1	Issue Date:	14/04/2022
Due Date:	13/07/2022	Date of Closure:	13/07/2023
Area/Process:	Genting Sabapalm Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3 - 4.3.1.4 Minor
Requirements:	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.		
Statement of Nonconformity:	The monitoring of implementation of applicable legal requirement by the supplier was not effectively implemented.		
Objective Evidence:	During site verification, sighted the sundry shop have a storage of cylinder gas and diesoline without any permit/approval from respective authorities. Furthermore, it also against the Tenancy Agreement dated 1/1/2022, GSPE/Tenancy/22/01/01 under clause J.		
Corrections:	1) To conduct awareness briefing regarding the Tenancy Agreement. 2) To request the sundry shop to obtain permit to keep and sell cylinder gas as it is fall under Akta Barang Kawalan.		
Root cause analysis:	No briefing was conducted to sundry shop owners about the compliances to the Tenancy Agreement. Checking on the sundry shop compliance to the applicable and legal requirements were also not conducted.		
Corrective Actions:	Estate to conduct briefing to the sundry shop owner on a yearly basis to ensure all requirements as per Tenancy Agreement complied and the sundry shop to submit to the estate office all relevant and valid licenses and permits for monitoring.		
Assessment Conclusion:	The effectiveness of corrective action plan implementation will be assessed during next assessment.		
Verification Statement	The NC was not effectively closed due to the tenant has yet to obtain the permit from the authority. Thus, this Minor NC is escalated to Major. See NCR #2366501-202307-M1.		

Non-Conformity Report			
NCR Ref #:	2188014-202204-N2	Issue Date:	14/04/2022
Due Date:	13/07/2022	Date of Closure:	13/07/2023
Area/Process:	Genting Sabapalm Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3 - 4.5.5.1 Minor
Requirements:	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: Assessment of water usage and sources of supply.		
Statement of Nonconformity:	Mitigation plan for water quality issue was not identified and documented.		
Objective Evidence:	No mitigation measure was sighted in the Water Management Plan on issue related to off spec on Fecal Coliform and Total Coliform Count. Reference is made to water quality analyzed by Dynakey Laboratories Sdn Bhd for Genting Sabapalm Estate		

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	sample received on 19/2/2022, sampling date 18/2/2022 from Labour Quarter – Air Terawat.									
Corrections:	<p>To reviewed and revised the current water management plan by including the action plan.</p> <ol style="list-style-type: none"> 1) To prepare mitigation plan for the Off-spec parameter from the water sample report dated 19/02/2022 from Labour Quarter – Air Terawat. 2) To revise the SMP-GPB-15 and water management and including the requirements to conduct investigation and prepare action plan to mitigate the off-spec parameter. 									
Root cause analysis:	<p>Estate management not aware the requirement of including the water analysis report action plan into estate water management plan as estate management assume it is sufficient.</p> <p>There is no statement mentioning the requirements to conduct investigation and preparing action plan regarding the off-spec parameter once water analysis report receive from the appointed Laboratory.</p>									
Corrective Actions:	<p>Estate Senior Assistant Manager will review and acknowledge the water management plan every quarterly and to be approved by the Senior Estate Manager before filling.</p> <p>Training to the estate PIC regarding the revised SMPM – (Sustainability Management Procedure Manual) to ensure PIC understand the requirements.</p>									
Assessment Conclusion:	The effectiveness of corrective action plan implementation will be assessed during next assessment.									
Verification Statement	<p>Water management plan have been establish dated 01/03/2023. Training for water treatment plant operator and sampling have been conducted by management base on SMPM dated 07/06/2023. Attended by operator and staff.</p> <p>The latest record of water sampling for Domestic used was available and complied with legal. The test conducted by DYNAKEY Laboratories Sdn Bhd dated 21/02/2023 as per test report W230221/01. The result as per below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Parameter</th> <th style="width: 33%;">Result</th> <th style="width: 33%;">Drinking water quality standard</th> </tr> </thead> <tbody> <tr> <td>Fecal coliform</td> <td>ND(<1.8)</td> <td>ND in 100 ml</td> </tr> <tr> <td>Total coliform</td> <td>ND(<1.8)</td> <td>ND in 100 ml</td> </tr> </tbody> </table>	Parameter	Result	Drinking water quality standard	Fecal coliform	ND(<1.8)	ND in 100 ml	Total coliform	ND(<1.8)	ND in 100 ml
Parameter	Result	Drinking water quality standard								
Fecal coliform	ND(<1.8)	ND in 100 ml								
Total coliform	ND(<1.8)	ND in 100 ml								

Opportunity For Improvement			
Ref:	2188014-202204-I1	Clause:	MSPO 2530 Part 3 - 4.4.5.4
Area/Process:	Genting Sabapalm Estate		
Objective Evidence:	The details stated in the contracts workers’ pay slip could be further improve.		
Verification Statement	<p><u>ASA1 4 Verification Statement:</u></p> <p>Based on verification of the sampled latest pay slips of the contractors’ workers, compared to the previous version, the information about total outturn days had been included. Thus, the average earning per day can be calculated. The average earning was found to be meeting the MWO 2022.</p>		

Opportunity For Improvement			
Ref:	2188014-202204-I2	Clause:	MSPO 2530 Part 4: 4.5.5.1

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Area/Process:	Genting Sabapalm Oil Mill
Objective Evidence:	Need to improve on Safety measures for instance fencing at the Water treatment Plant as the water being used for domestic consumption.
Verification Statement	<u>ASA1</u> 4 Verification Statement: From the site verification the water treatment plant fencing was in good condition and maintain accordingly. The OFI was close accordingly.

3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
1750088-201903-M1	Part 4: 4.6.3.2 - Major	15/03/2019	Closed on 21/05/2019
1750088-201903-M2	Part 4: 4.5.3.3 - Major	15/03/2019	Closed on 21/05/2019
1750088-201903-M3	Part 3: 4.4.5.9 - Major	15/03/2019	Closed on 21/05/2019
1750088-201903-M4	Part 3: 4.5.3.3 - Major	15/03/2019	Closed on 21/05/2019
1750088-201903-N1	Part 4: 4.3.1.4 - Minor	15/03/2019	Closed on 10/07/2020
1750088-201903-N2	Part 4: 4.4.6.3 - Minor	15/03/2019	Closed on 10/07/2020
1750088-201903-N3	Part 3: 4.4.5.4 - Minor	15/03/2019	Closed on 10/07/2020
1750088-201903-N4	Part 3: 4.4.6.3 - Minor	15/03/2019	Closed on 10/07/2020
1932021-202007-M1	Part 3: 4.2.2.3 - Major	10/07/2020	Closed on 05/10/2020
1932021-202007-M2	Part 3: 4.4.5.3 - Major	10/07/2020	Closed on 05/10/2020
1932021-202007-M3	Part 3: 4.6.1.1 - Major	10/07/2020	Closed on 05/10/2020
1932021-202007-M4	Part 4: 4.2.2.3 - Major	10/07/2020	Closed on 05/10/2020
1932021-202007-M5	Part 4: 4.4.5.8 - Major	10/07/2020	Closed on 05/10/2020
1932021-202007-M6	Part 4: 4.6.1.1 - Major	10/07/2020	Closed on 05/10/2020
2188014-202204-M1	Part 3: 4.4.4.2 - Major	14/04/2022	Closed on 16/06/2022
2188014-202204-M2	Part 3: 4.4.5.8 - Major	14/04/2022	Closed on 16/06/2022
2188014-202204-M3	Part 3: 4.5.3.2 - Major	14/04/2022	Closed on 16/06/2022
2188014-202204-M4	Part 4: 4.3.1.1 - Major	14/04/2022	Closed on 16/06/2022
2188014-202204-M5	Part 4: 4.4.4.2 - Major	14/04/2022	Closed on 16/06/2022
2188014-202204-N1	Part 3: 4.3.1.4 - Minor	14/04/2022	Escalated to Major
2188014-202204-N2	Part 3: 4.5.5.1 - Minor	14/04/2022	Closed on 11/10/2023
2366501-202307-M1	Part 3: 4.3.1.4 - Major	13/07/2023	Closed on 11/10/2023
2366501-202307-M2	Part 3: 4.4.4.2 - Major	13/07/2023	Closed on 11/10/2023
2366501-202307-M3	Part 3: 4.4.5.3 - Major	13/07/2023	Closed on 11/10/2023
2366501-202307-M4	Part 3: 4.5.5.3 - Major	13/07/2023	Closed on 11/10/2023

2366501-202307-M5	Part 4: 4.3.1.1 - Major	13/07/2023	Closed on 11/10/2023
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3.5 Issues Raised by Stakeholders


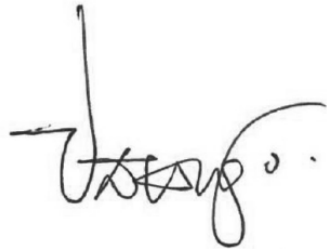
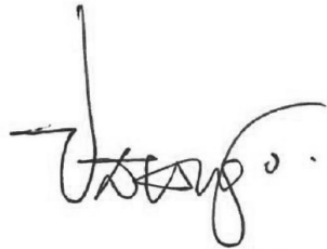
IS #	Description
1	<p>Issues: <u>Local communities (Kg Klagan Baru) representatives</u> The surrounding communities have a very good relationship with the company and has been transparent to them should there be any issues of concern. There has been no undissolved issue so far nor land dispute. So far, the activities of the certification unit did not adversely impact the surrounding communities. The company has also always invited their representatives to attend meetings as a channel to discuss any social issues. They were also made to understand the mechanism to lodge complaint or grievance should there be any. In term of contribution, occasionally the company has provided their machinery and manpower to repair or maintain roads and drainage in the village. There are also several villagers who are working for the company.</p>
	<p>Management Responses: No further issue.</p>
	<p>Audit Team Findings: No further issue.</p>
2	<p>Issues: <u>Local communities (SMK Pamol)</u> SMK Pamol is located around 10 km from the Genting Sabapalm POM and estate. Most of the children in Genting Sabapalm Certification Unit are going to SMK Pamol. The management of SMK Pamol confirm that good relationship has been maintained by both parties. The CU has also regularly contributed in term of manpower and expenses for many of the school activities. Complaint procedure and consultation procedure has been communicated to them during the stakeholders meeting.</p>
	<p>Management Responses: No further issue.</p>
	<p>Audit Team Findings: No further issue.</p>
3	<p>Issues: <u>Vendors/Contractors/smallholders (FFB suppliers)</u> The vendors and contractors have a good relationship with the company where they have been providing the service for many years. The contractors also mentioned that the award of contract was done through fair and unbiased tendering process. The smallholders confirmed that pricing mechanism was clearly explained to them and there has been no issue so far in term of timing of payment. The management and staff of the operating units have also been very accommodating should there be any issues of concern. The company has also always invited the vendor to attend the stakeholder meetings as a channel to discuss any social issues. They were also made to understand the mechanism to lodge complaint or grievance should there be any.</p>
	<p>Management Responses: No further issue.</p>
	<p>Audit Team Findings:</p>



	No further issue.
4	<p>Issues: <u>Gender committee representatives</u> Among the main objectives of the committee are:</p> <ul style="list-style-type: none"> - To raise awareness, identify and address issues of concerns, opportunities, and areas for improvement for workers especially women. - To create a safe community within operations where women can raise issues and concerns at work and in their lives with a focus on zero tolerance to sexual harassment and gender-biased violence. <p>The committee is required to plan annual activities to achieve the objectives. Among the important activity planned were briefing/training to female workers/employees on understanding the meaning of sexual harassment and domestic violence and method of reporting should it happen. The management has also been very supportive with the programmes in term of financial, facilities and other resources. Since the last audit, there was no sexual harassment case reported.</p>
	<p>Management Responses: No further issue.</p>
	<p>Audit Team Findings: No further issue.</p>
5	<p>Issues: <u>Field workers (estate and mill)</u> The management has been very accommodative to the workers in term of welfare. Safety at the workplace is a top priority imposed by the management. Adequate trainings and free PPE were among the main needs given by the management. With regards to welfare, housing facilities, water & electricity supply were always maintained in good conditions. Workers were also made to understand the mechanism to lodge complaint or grievance should there be any. There has been no issue with regards to delivering the terms & conditions stipulated in the employment contract so far.</p>
	<p>Management Responses: No further issue.</p>
	<p>Audit Team Findings: No further issue.</p>

3.6 List of Stakeholders Contacted

<p>Government Officer: -</p>	<p>Community/neighbouring village: Kampung Klagan Baru SMK Pamol</p>
<p>Suppliers/Contractors/Vendors: Smallholders Contractors – undisclosed names</p>	<p>Worker’s Representative/Gender Committee: Estate and mill workers Gender representative</p>

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings		
Based on the findings during the assessment, Genting Sabapalm Oil Mill and Estate Certification Unit complies with the MS 2530-2:2013 or MS 2530-3:2013 or MS 2530-4:2013. It is recommended that the certification of Genting Sabapalm Oil Mill and Estate Certification Unit is continued.		
Acknowledgement of Assessment Findings		Report Prepared by
Name: Abdul Rahim Wilson Abdullah	Name: James Chung Khim Hon	Name: Valence Shem
Company name: Genting Plantations Berhad	Company name: Genting Oil Mills(Sabah) Sdn Bhd	Company name: BSI Services (Malaysia) Sdn Bhd
Title: Senior Vice President - Plantation (Malaysia)	Title: Senior Vice President- Group Processing	Title: Lead Auditor
Signature: 	Signature: 	Signature: 
Date: 16/11/2023	Date: 16/11/2023	Date: 08/11/2023

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Signature: 	Signature:	Signature: 
Date: 16/11/2023	Date: 16/11/2023	Date: 08/11/2023

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 Plantations Berhad has developed Malaysian Sustainable Palm Oil (MSPO) Policy, version dated 18/03/2014 signed by President & Chief Operating Officer, Mr. Yong Chee Kong. The company ensure compliance with MSPO and the MPOB Code of Practice requirements. The policy was communicated to internal and external stakeholders through various means such as briefing during morning muster, display on notice boards, and stakeholder’s consultation meetings, to name a few.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	In the above-mentioned policy, the company is committed to continue to assess and develop new and innovative techniques, approaches and practices with the objective of continuous improvement in the journey towards achieving sustainable palm oil.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Based on procedure, the internal audit was planned to be conducted at least once a year. The last internal audit was conducted on 22, 27, and 28/06/2023 by two internal auditors sourced from the Sustainability Dept. Based on the internal audit report and checklist, the internal audit had sufficiently covered all the requirements of the standard.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Internal audit process is guided by Sustainability Internal Audit procedure [SMP-GBP-03, rev. 7, dated 13/06/2022]. There were 2 major NCRs, 2 minor NCRs, and 3 observations raised as a result of the internal audit. The operating unit has identified the root-cause to establish the appropriate correction and corrective actions.	Complied
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	The internal audit report was well maintained at the office and made available for verification. The results and status of corrective action were also one of the agenda of the management review meeting.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	A combined management review meeting between the mill and estate was last conducted on 07/07/2023. It was chaired by the VP Plantations – R2, Abdul Rahim Wilson and attended by 11 key personnel such as SEM, MM, SAM, AM, ME, doc controller, CC, Sustainability Manager & Executive. Among the agenda discussed and recorded in the minutes were: 1) Status of outstanding issues from previous meeting 2) Changes, improvement, or modification of the sustainability management system 3) Internal and external audit findings on sustainability mgt sys 4) Complaints, grievances, and enquiry book/record 5) Stakeholder meeting report/minutes 6) Greenhouse value (specific to ISCC, RSPO, MSPO) 7) Review continual improvement status & its recommendations. 8) Review on resource & training requirements	Complied

Criterion / Indicator		Assessment Findings	Compliance
		9) Review on sustainability policy and its objective status 10) Review of effectiveness in achieving quality, environmental, social, safety, and health 11) Compliance status on legal and other requirements 12) Preventive and corrective actions 13) Follow up actions from management review 14) Changes that could affect the management system 15) Customer feedback 16) Recommendations for improvement 17) Any other matters	
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 -	The estate had established management plan for the continuous improvement among others as described below compiled based on the social and environmental concerns. Review date made in Jan and Feb annually subject to estates requirement and need. a) Reduction in use of pesticides The estate adopted several continuous improvements in reducing of pesticides i.e., increasing planting of beneficial plants mainly <i>Tunera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> . - The estate also adopted planting of <i>Legominious</i> Cover Crop mainly <i>Pueraria Javanica</i> and <i>Calopogonium Mucunoides</i> at replanting area to minimize circle and selective weeding.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced encouraging soft grasses in inter row and frond stacking area. - Mills wastes such as EFB were used as fertilizer in the selected fields where the application is economically viable. <p>b) Environmental impacts Environmental impact assessment, management action plans and continuous improvement plan for the estate has been updated and monitored by management. Among others the improvement actions:</p> <ul style="list-style-type: none"> - Construction of sump at chemical and workshop to prevent ground or water contamination. - Collect back chemicals bags and allocate store for control of misused. - use of tray for tractor parking to prevent ground contamination. <p>c) Waste reduction The management had planned to reduce emission by daily inspection and monitoring for their farm tractors / lorries to prevent any leakage and problem which can impact on smoke emission.</p> <p>d) Pollution and greenhouse gas (GHG) emissions The management of the estate had plan to reduce emission by daily inspection and monitoring for their farm tractors/ lorries to prevent any leakage and problem which can impact on smoke emission.</p>	

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Criterion / Indicator		Assessment Findings	Compliance								
		<p>e) Optimising the yield of the supply base.</p> <p>The yield performance has always been the top priority in ensuring long-term economic and financial viability. In general, various efforts to optimise the yield of the plantation among others:</p> <ul style="list-style-type: none"> - maximizing crop recovery, - optimum ripeness standard (harvest ripe bunches only and 100% loose fruit collection), - the soil fertility was maintained and planting only high yielding planting material <p>Others improvement and enhancement program as shown below;</p> <table border="1"> <thead> <tr> <th></th> <th>OU</th> <th>Section</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>GSPE</td> <td>Social</td> <td>Multi-Purpose Hall Upgrading 2023 RM 20K</td> </tr> </tbody> </table>		OU	Section	Details	1	GSPE	Social	Multi-Purpose Hall Upgrading 2023 RM 20K	
	OU	Section	Details								
1	GSPE	Social	Multi-Purpose Hall Upgrading 2023 RM 20K								
4.1.4.2	<p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p>- Major compliance -</p>	<p>This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the GM and higher Head Of Department are transacted during the monthly Managers meetings and emails. Provision of machine and other major requirement are made in CAPEX budget.</p>	Complied								
4.1.4.3	<p>An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established.</p> <p>- Major compliance -</p>	<p>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.</p>	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>Genting Plantations Berhad has developed Procedure 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. The procedure has been briefed to the internal and external stakeholders. Briefing to the external stakeholders was conducted during the stakeholder meeting conducted on 11/04/2023. 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>Genting Plantations Berhad has developed Procedures on 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. Based on the procedure, the list of documents which are publicly available as follows:</p> <ul style="list-style-type: none"> • Company annual report • Group policies • Reports related to environment such as EIA, EAI • RSPO external audit reports 	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Pollution prevention plan • Continuous improvement plan • Complaints and grievances book and its procedure • Negotiation and compensation procedure • Sexual harassment procedure <p>Genting Sabapalm Estate 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> <ul style="list-style-type: none"> • Land title • Policies • Reports – EAI, SIA, HCV and audit reports • Management plans • Procedures <p>The stakeholders were briefed on the request and response during the stakeholder meeting conducted on 11/04/2023.</p>	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>Genting Plantations Berhad has developed Procedure 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 &</p>	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 -	Genting Plantations Berhad has appointed the Sr. Manager as management representative for ISCC, RSPO and MSPO related matters as per appointment letter dated 12/04/2021 signed by Vice President-Plantation.	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 -	Stakeholder list for Genting Sabapalm Estate was made available for verification. The stakeholders such as contractors, suppliers, local communities, and government authorities were included into the list. A stakeholder meeting was conducted on 14/04/2023. Stakeholders such as local communities, local authorities, contractors, and suppliers were invited and attended the meeting. Meeting minutes were made available for verification.	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 -	An SOP has been established SOP for traceability and documented in Genting Plantations Berhad, Sustainable Management Procedure Manual SMP-GPB-33 revision 00 dated Sept 2020: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability. Therein describing information of FFB flow chart from harvesting designated block to mill weighbridge (tickets).	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The estates monitor the despatch to the mill on daily basis to tally and tracking the volume harvesting and tonnage despatch to the mill. Factors on the FFB balances in the fields are accounted for in the process. Other records include daily FFB harvested and dispatched and summary in the monthly yield statistics. The daily despatch to the mill	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		is checked vs the received with the monitoring of the weight differences.	
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	Appointment letter was available for Floriana Stanley Kiming dated 03/01/2023. Appointed by Senior Estate Manager Genting Sabapalm Estate, Tan Yeong Huat. Duties among others include the following: a) To ensure quality and environmental systems. b) To ensure test equipment is in order and functional. c) To ensure products meet customers targets and quality. d) To ensure all requirement in SCCS are complied with. All appointed letters were sighted and verified.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	The FFB weighbridge ticket/despatch notes are produced for all transaction to Sabapalm Oil Mill. The set of document consists of the following information among others. As per sample in 4.2.3.1 the record of sales and delivery was available as per below information was verified: FFB Despatch No. A156544 Dated: 30/06/2023 Weighbridge Ticket: FFB230008552W Weight: 6260 kg Block: SSP1P99AW FFB Despatch No. A096500 Dated: 09/01/2023 Weighbridge Ticket: FFB23000240W	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Weight: 7310 kg Block: SSP1P99BC	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	<p>The estates continued to comply with legal requirements. Compliance to each applicable law and regulation is monitored by estate management, Regional Office and Sustainability Department. The licenses and permits governed by the Local, State and Federal authorities among others as shown below:</p> <ul style="list-style-type: none"> - JTK License for salary deduction was available for travelling document deduction, recreation club, sundry shop payment, electricity and phone and others. Referred license 11(0996)SDK dated 28/07/2017. - MPOB license 574439011000 was valid from 01/07/2022 until 30/06/2023 for Nursery. - MPOB license 523495002000 was valid from 01/10/2022 until 30/09/2023 valid for 4,358.58 ha - License installation for electricity from Suruhanjaya Tenaga referred License no 004285/2023 for ST(SSD)P/S/SBH/01472 dated 10/05/2023. - PMT License for Air Receiver tank (SB PMT 10434) was valid until 17/07/2023. - License for Petrol Ron 95 for 200 litre from KPDNKK as per refer KPDNHEP.SDK.100/2021(PK) valid from 21/09/2022 until 20/09/2023. 	Complied

Criterion / Indicator		Assessment Findings	Compliance												
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	The Legal Requirements Register (LRR) covers all the necessary regulatory requirements. The LRR for was reviewed annually. The list of applicable legal and other requirements was made available during the assessment and complied in the Sustainability Management Procedure Manual SMP-GPB-22 having revision no. 6.	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 -	<p>The Sustainability Department (SD) based Head Office is responsible to track changes in the law and the information was disseminated to all its plantations and mills. SD which is based in <i>Wisma Genting</i> is responsible for tracking any changes to the Acts and Regulations. In addition, the SVP Processing (Malaysia) also played a role in disseminating new Acts & Regulations to all the estates in the Group.</p> <p>a) This was made via communication with the publisher of the documents.</p> <p>b) This mechanism was outlined in the procedure.</p> <p>c) The updating of the legal register is made on a periodical basis.</p> <p>d) Changes in the legal register if any are communicated to the respective regions.</p> <p>e) The mill had entirely adopted the GPB established documented system for identifying, tracking, accessing and updating the legal requirements. It had ensured that all applicable legal requirements pertaining to MSPO are established, implemented and maintained. The latest revision on the LRR was made dated 27/05/2022 on the following changes;</p> <table border="1" data-bbox="1070 1289 1883 1393"> <thead> <tr> <th></th> <th>Rev date</th> <th>Title</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>27/05/22</td> <td>Min Wages Order 2022</td> <td>Newly added</td> </tr> <tr> <td>2</td> <td>27/05/22</td> <td>Employment (Amendment) Act 2022</td> <td>Revision</td> </tr> </tbody> </table>		Rev date	Title	Remarks	1	27/05/22	Min Wages Order 2022	Newly added	2	27/05/22	Employment (Amendment) Act 2022	Revision	Complied
	Rev date	Title	Remarks												
1	27/05/22	Min Wages Order 2022	Newly added												
2	27/05/22	Employment (Amendment) Act 2022	Revision												

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Criterion / Indicator		Assessment Findings		Compliance
		3	27/05/22 Windfall Profit Levy OP Amendment Order 2021	Revision
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>The Estate Managers appoint the Chief Clerks as the PIC for updating changes in laws at the estates. Respective letters as follows were sighted and verified.</p> <p>However, the monitoring of compliance to applicable legal requirement by a supplier was not effectively implemented as the following lapses were found:</p> <ol style="list-style-type: none"> 1) During the site verification at the estate’s sundry shop (Kedai Runcit Nuryani) in Bangkawat Division, it was found that the shop is storing and selling LPG without any permit/approval from the respective authority. 2) GSPE has established an application form for opening a stall during night market (“tamu”) organised inside the premise and the application must be approved by the management. Based on the security gate’s registration logbook of visitors, there were 32 sellers allowed to come in and set up their stalls during the latest “tamu” on 07/07/2023. However, only 2 of them had the documented approval from the management, but there was no evidence to show that the 2 sellers are holding valid trading license. This is not in-line with GSPE’s documented “<i>Syarat Kebenaran Berniaga</i>” (Terms to Trade), Clause no. 1 which reads “<i>Hendaklah mempunyai lesen berniaga yang sah</i>” (Must possess a valid trading license). <p>Due to the corrective action for the previous minor non-conformity for this indicator was not effectively implemented, it is now escalated to major during this assessment.</p>		Major Non-conformity

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	The was no evidence to show that oil palm cultivation activities Genting Sabapalm Estate had diminished the land use rights of others. Verified documents to show legal ownership of its land by Genting Plantations Berhad.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	The estate holds 3 land titles (#085109xxx, #085109xxx and #CL 085319xxx) as evidence that GPB has the right to use the land. Copies of the land titles were made available for verification.	Complied
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The estates have installed boundary markers/trenches/signage as sighted during the visit to the fields. This confirmed that they have visibly maintained and demarcated the boundary markers via installing the red/white pole and signage. Perimeter boundary have been verified between Genting Sabapalm Estate and Styland Sdn Bhd was verified as per coordinate below: 5°56'10" N 117°25'28" E	Complied
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute in the Genting Sabapalm Estate at the time of audit. This has been verified through interview with the local community. Genting Plantations Berhad has the right to use the land through possession of land titles. Thus, this Indicator is not applicable.	Not applicable
Criterion 4.3.3 – Customary rights			

Criterion / Indicator		Assessment Findings	Compliance
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	NA as there is no land encumbered by customary rights.	Not applicable
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. - Minor compliance -	NA as there is no land encumbered by customary rights.	Not applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	NA as there is no land encumbered by customary rights.	Not applicable
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Social Impact Assessment (SIA) & Human Rights Impact Assessment (HRIM) Report was last reviewed in August 2022 for both Genting Sabapalm Oil Mill and Genting Sabapalm 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 interviewed. Social Management and Monitoring Plan of Genting Sabapalm Estate was reviewed and last updated in April 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.	Genting Plantations Berhad has established Complaints and Grievances procedure with Doc. No.: SMP-GPB-19, Rev. 04 dated March 2020 to	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	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.	
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 estate has implemented Complaints/ Grievances Record Book to record any complaint or grievance received. Most of the complaints were of maintenance of housing facilities. Based on verification of the complaints/grievance records, all the issues were resolved in appropriate manner.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	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 suggestion 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 -	Briefing to the external communities was conducted on 11/04/2023 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 -	The records of complaint for the past 24 months i.e., since July 2021 were well maintained and made available for verification.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			

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Criterion / Indicator		Assessment Findings	Compliance
4.4.3.1	<p>Growers should contribute to local development in consultation with the local communities.</p> <p>- Minor compliance -</p>	<p>Among the notable contributions to local development given by the estates and mill are as follows:</p> <ul style="list-style-type: none"> - Providing manpower and machines for repairing and maintenance works at nearby communities such as schools, Klinik Desa, Police Station, villages, etc. - Miscellaneous donations to support schools' events 	Complied
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>The Occupational Safety and Health Policy was established, signed by President and Chief Operating Officer on 01/07/2018. The policy was communicated during Policy briefing from time to time. The policy was displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH personnel from Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors. In interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the policy. Communication to worker have been conducted yearly basis, latest policy has been communicated was on 01/03/2023.</p>	Complied
4.4.4.2	<p>The occupational safety and health plan shall cover the following:</p> <ul 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. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: 	<ul style="list-style-type: none"> a) The Occupational Safety and Health Policy was established, signed by President and Chief Operating Officer on 01/07/2018. The policy was communicated during Policy briefing from time to time. Latest communication was on 01/03/2023. b) The risk assessment has been conducted such as HIRARC dated 30/03/2023. There also other risk assessment such as CHRA 	Major Non-conformity

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Criterion / Indicator	Assessment Findings	Compliance
	<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 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 and 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 must have knowledge and access to latest national regulations and collective agreements. 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. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. 	<p>(Chemical Hazard Risk Assessment) as per report no. JKPP HQ/07/ASS/00/236-2019/158 dated 09/04/2019 – 31/10/2019. This report conducted by QMSPRO Sdn bhd. Another Assessment was on Noise, Noise Risk Assessment (NRA) referred report CC/0421/053 dated 01/04/2021. The record was available at estate.</p> <ul style="list-style-type: none"> c) The awareness training programme was available for FY 2023. As per programme sapling on latest record of Audiometric test was on 13/03/2023 with total workers involve 54 people included driver tractor, Superbull driver, wokshop, compactor and etc. This audiometric test conducted at DAB OH Sdn Bhd, result showed 46 with normal hearing, 7 abnormal audiogram and 1 Standard Threshold Shift. From the repeated record there was no NIHL (Noise Induce Hearing Loss) record in the estate. The training on Hearing conservation was available dated 30/06/20223. Medical surveillance conducted 13/01/2022 at Klinik Elopura Sdn Bhd with total 32 workers and all fit to work with chemical. d) The estates provide PPE to the employees relevant to the work handled by the workers. The estates provide PPE to the employees relevant to the work handled by the workers. The list of PPE that were provided by the estates are as below: <ul style="list-style-type: none"> i. Harvester- Safety Helmet, Sickle Cover, Hand Glove, Wellington Boots ii. Sprayers- Respirator, Nitrile Glove (Chemical Resistant), Goggles, Wellington Boots, Apron. iii. Manuring- Apron, Wellington Boots, Dust Mask e) SOP for chemical management SMP-GPB-28 (Rev 04), Dated July 2018) was established. Register of Chemical was sighted to include

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>the entire chemical used in the estate. Sighted evidence of chemical register for samples unit has been updated on January 2022. OSH committee appointment letter was available for Pn. Malini Bolokan Bansinai as secretary for OSH Committee dated 20/04/2013.</p> <p>f) OSH Meeting conducted on 24/05/2023 for 02/2023 attended on 19 persons. Previously conducted on 22/02/2023 and 29/11/2022.</p> <p>g) OSH accident and emergency procedure was available under document OM-GPB-01 dated 01/01/2010. The Estates has site specific Plans in the OSH Manual (OM-GPB-04, Rev:0, Dated 1/1/10) including ERP for accident, ERP for Fire, ERP for chemical spillage, maps showing assembly areas and up to date lists of emergency contacts with training conducted to communicate the Plan. There also standard operating procedure for Fire Fighting as per SOP-PD-12 rev: 00 issue date: Oct 2020. This also included fire control system.</p> <p>h) First aid Kit training have been conducted on 23/02/2023 attended by 38 persons (32 was the first aider). Trained by Hospital Assistant Malini Bolokan Bansinai.</p> <p>i) Accident reported was available, sampling on JKPP 8 as per report JKPP 8/119351/2022 dated 03/01/2023. There only 4 incidents have been reported under JKPP 8 where the MC was not more than 4 days. Total lost day was 3 days. The LTA was 9.39.</p> <p>However, during site visit sighted: Store Upkeep Standard Procedure (GENP/SOP/00/005) dated 11/10/2022 under 6.3.3 stated to ensure all Safety Data Sheet was available at storage and updated. However, verification on site at water treatment plant area, there was no Safety data sheet for all</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>chemical such as chlorin, alum, and also lubricant oil that been stored. There was also found that the bund system for water treatment plant chemical storage was not available.</p> <p>Sighted during site verification a yellow lotion in 1st Aid box at water treatment plant area was expired on 04/23.</p> <p>Thus, Major NC was raised during this assessment.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>Genting Plantations Berhad 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. Communication to the employees was done in various methods such as briefing during morning muster, display on notice boards and training. Interview with workers showed that they have a good understanding on human rights.</p>	Complied
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>The company is committed to ensure all the employees are treated equally regardless of race, nationality religion, gender, age, and other political opinions. Interview with the workers showed that no discrimination is being practiced.</p>	Complied
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p>	<p>There was no trade union at the estate. Nonetheless, workers were aware that there is no restriction for them to join any union. 10 workers were sampled for the appropriateness of their employment contract and pay slips. Based on verification of pay slips and interview with the workers, generally, the pay and conditions were found to be meeting</p>	Major Non-conformity

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	the legal minimum standard and in-line with the employment contracts. However, from the sampled pay slips, it was found that one of the workers (employee's ID: E00859), the average earning per day was RM55.07/day which did not meet the MWO 2022 i.e., RM57.69/day for the month of June 2023. Thus, a major non-conformity was assigned.	
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 is ensuring the employees of contractors are paid based on legal or industry minimum standards by verifying the payslips of the workers. Crosschecking of sampled of the payslips showed that the pay was delivered accordingly including the employer's contribution of EPF, SOCSO and EIS.	Complied
4.4.5.5	The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	The estate is maintaining the data base of all their registered workers in the Lintramax system. Among the information available in the system was name, employee no., date joined, gender, date of birth, and type of work, to name a few.	Complied
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records. - Major compliance -	Employment contract is provided for every worker which is signed by the employer and employees. Based on verification of the contract contents, the stipulated terms & conditions found to be fair. 10 samples of employment contracts verified, and based on interview, the workers had voluntarily signed the contracts and they were also made to understand the contents by the management. Nonetheless, the effective date stated in the employment contract of foreign workers can be further improved to harmonise with the work pass effective date (OFI).	Opportunity for improvement

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. - Major compliance -	The working hours are manually recorded during muster call and thereafter transferred to computerised wage payment system. Verification on the system and pay slips confirmed that the attendance was accurately recorded.	Complied
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance -	Working hours and breaks stated in the employment contract were found to be complied with the legal requirements. Based on interview with workers and document review, it was confirmed that overtimes offered and taken were based on mutual agreement. The rate calculation was also found to be in accordance with legal requirement. Based on sampled pay slips, there was no evidence that the total overtime in a month exceeded the legal requirement.	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 -	Documented payslips were given to each worker on pay day, which is not later than 7th of every month. Wages and overtime were paid according to the attendance record which includes the total hours of overtime and daily attendance. Among the information available in the payslip was name of workers, itemised details of income, itemised details of deduction, no. of turn-out days, no. of absent days, and nett income to name a few.	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 -	Among other benefits offered to the employees were outturn incentive, productivity incentive, and medical clinic. Quarters were also equipped with sport facilities and place of worship.	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	The estate management has provided free housing facilities to all the workers. Basic amenities such as water and subsidised electricity were provided to the workers. Housing inspection is carried out fortnightly by the Estate Hospital Assistant. Based on verification of the inspection	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. - Major compliance -	records, any issues identified were recorded and appropriate actions were taken accordingly.	
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Genting Plantations Berhad has 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. Procedure on Prevention and Eradication of Sexual Harassment at the Workplace was established with Doc. No.: SMP-GPB-20, Rev. 1 dated 11/01/2023. Process of handling sexual harassment complaint was outlined in the procedure. There was no case of sexual harassment and violence reported.	Complied
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	There was no trade union in the estate. 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.	Complied
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education	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 / Indicator		Assessment Findings	Compliance
	programmes. Children shall not exposed to hazardous working conditions. - Major compliance -		
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 -	All employees and contractors are appropriately trained. Training matrix and training programme for 2022/23 was established by the estates' management. First aid training conducted on 30/06/2023 Nursery training on P&D and transplanting dated 15/02/2023 Training for Crèche dated 23/02/2023 Training on working at height dated 15/06/2023 Air compressor training dated 31/03/2023 Sexual harassment training and mother consultation 13/14/2023 Training on recycle waste and policy dated 30/03/2023 Scheduled waste training conducted on 31/03/2023 Recycle waste training conducted on 15/03/2023 for all workers. HCV and riparian buffer zone training conducted on 14/03/2023.	
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 -	The estate has established the training program for the assistant, workers and contractors base on training need analysis conducted. The training need analysis was documented in Training Matrix analysis. The analysis was based on job designation and type of training needs for the employee. The training type was divided into 3 type, Core training, Non-core training – theoretical training and non-core training – theoretical and hands on training. The training has been identified and	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>already put for planning. Verification on training record for year 2023 as per below:</p> <p>Spraying technique and chemical handling training dated 10/13/2023</p> <p>Fertilizer training application dated 03/07/2023</p> <p>Harvesting training dated 15/02/2023</p> <p>FFB grading training dated 09/03/2023</p>	
4.4.6.3	<p>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.</p> <p>- Minor compliance -</p>	<p>The estate has training program which updated annually based on training need analysis. The training identified were programmed throughout the year dated Jan 2023.</p>	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	<p>An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>The Group Environmental Policy had been established and implemented for all Mills and Estates. The policy was signed by the President / Chief Operating Officer of Genting Plantations Bhd dated 05/10/2009 and displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented along with other Policies through the OSH activities by the on-site Safety Officers and monitored by OSH/Sustainability Unit from Head Office. Included in the Policy among others are the following commitment.</p> <p>a) Commitment and protection of the environment according to the applicable laws.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>b) Establishment of environmental management plan developed from results of aspect and impact analysis, mitigation, monitoring plans and records of implementation with timelines.</p> <p>c) Continual improvement program</p> <p>d) Awareness through training / briefing program & session to all employees and stakeholders.</p> <p>During interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the basic objectives and intention of the Policy.</p>	
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations.</p> <p>- Major compliance -</p>	<p>The Environmental Policy was established, signed by President and Chief Operating Officer on 05/10/2009. Therein the policy among others has stated that the Company is committed to protecting the environment and conserving biodiversity through sustainable development. This is policy is prominently displayed in the office along with other Company's Policies.</p> <p>The policy was communicated to the employees through the briefing during muster and training ad hoc basis.</p> <p>The aspects and impacts had been provided in the Environmental Aspects and Impacts and Evaluation Of Significance 2023 Document reviewed in 01/03/2023 compiled internally by the Sustainability Department The analysis among others had covered the following activities;</p> <p>a) Harvesting / weeding / fertilizer application</p> <p>b) Mulching / road upkeep / ramp</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>c) Workshop / chemical store d) Lubricant store / fertilizer store e) Oil palm thinning f) Building construction g) Drainage/nursery/replanting h) EFB mulching i) Impact of field operations activities towards environmental j) Identification of riparian zone k) All the relevant positive/negative impact & mitigation plan.</p> <p>For replanting in Sabah, there was Environmental Compliance Report (ECR) conducted by Chemsain Konsultant Sdn Bhd referred report ref; CK/MO411/1379-1/23 dated 24/03/2023. The EIA report was under JPAS/PP/BLN/600-1/11/1/352(25) dated 25/02/2020 covering 2,026.58 ha.</p>	
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>The Environmental improvement and management plan was established at all the estates in the CU to include surface water runoff, water quality, chemical application, air quality, zero burning, fertilizer application and waste management.</p> <p>All the mitigation plans/objectives were established to mitigate the pollution identified. Among others, construction of terraces, planting of leguminous cover crop, construction of road site pit, clear marking for buffer one area, chemical reduction, zero burning policy, avoid fertilizer application close to waterways, proper landfill site and recyclable waste.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance														
		For the replanting area, the management need to build up the silt trap pit for drainage from the replanting area for ensure no pollution into the main river. From the latest report of ECR the management was comply with the requirement.															
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	<p>The environmental improvement plans are identified the Environmental Impact Assessment After Planting 2023 having details of mitigation of the negative impacts. They are summarized and shown below:</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Impact</th> <th>Mitigation</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Pesticide spraying</td> <td>Chemical residue to water course</td> <td>Riparian to mark 7 meters from river bank.</td> </tr> <tr> <td>Negative impact as polluting the soil with usage of chemicals.</td> <td>Dosage of chemicals is monitored & calibrated. Cattle integration introduced to reduce reliance of chemical.</td> </tr> <tr> <td>EFB bunch & ash application</td> <td>Leachate into soil</td> <td>Bins shall be emptied completely and broadcast at field quickly after receiving from mill</td> </tr> <tr> <td>Scheduled waste</td> <td>Fire/explosion - leakage, Spillage, poisonous</td> <td>To identify incompatibility of the sw and segregate.</td> </tr> </tbody> </table>	Activity	Impact	Mitigation	Pesticide spraying	Chemical residue to water course	Riparian to mark 7 meters from river bank.	Negative impact as polluting the soil with usage of chemicals.	Dosage of chemicals is monitored & calibrated. Cattle integration introduced to reduce reliance of chemical.	EFB bunch & ash application	Leachate into soil	Bins shall be emptied completely and broadcast at field quickly after receiving from mill	Scheduled waste	Fire/explosion - leakage, Spillage, poisonous	To identify incompatibility of the sw and segregate.	Complied
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Criterion / Indicator		Assessment Findings	Compliance
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	The estates continuously provide training to the workers to create awareness regarding the environmental policy and management plan established. The 2023 training program has included the following subject in relation to the environmental education and awareness. Scheduled waste training conducted on 31/03/2023 HCV and riparian buffer zone training conducted on 14/03/2023 Recycle waste training conducted on 15/03/2023 for all workers. Based on the samples taken, all training related to the process were found to be continuously improve the estate.	Complied
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	Discussions on environmental issues were discussed at the following forums: a) Stakeholder meetings b) ESH meeting on environmental issue if arises. c) Monthly management meeting should there be issues raised. d) Daily briefing during muster The respective stakeholder meetings for all the estates were held at the respective estates. Mainly the discussion focused on the scheduled waste and domestic waste handling. Minutes of meeting was sighted and verified. Sample on environmental meeting dated 10/02/2023. Based on the samples taken, the meeting related to the process were found to be discuss their concerns about environmental quality.	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	The estates record the following range data and tabulate the ratio against the FFB produced to determine the efficiency of their operations:	Complied

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Criterion / Indicator		Assessment Findings					Compliance																				
	<p>be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p>- Major compliance -</p>	<table border="1"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="6">Diesel L/FFB mt</th> </tr> <tr> <th>Baseline</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>GSPE</td> <td>1.40</td> <td>1.02</td> <td>1.04</td> <td>1.39</td> <td>1.38</td> <td>1.30</td> </tr> </tbody> </table> <p>There has been initiative by the management in reducing the diesel consumption through the following:</p> <p>a) Manual grass cutting reducing the tractor running hours. b) Optimum running hours of tractors. c) Scheduled maintenance of tractors.</p>	Estate	Diesel L/FFB mt						Baseline	2019	2020	2021	2022	2023	GSPE	1.40	1.02	1.04	1.39	1.38	1.30					
Estate	Diesel L/FFB mt																										
	Baseline	2019	2020	2021	2022	2023																					
GSPE	1.40	1.02	1.04	1.39	1.38	1.30																					
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 estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets. Refer details as per indicator 4.5.2.1 above. Figures were extracted from the diesel issuance of estate diesel tank.</p>	Complied																								
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p>	<p>There was no opportunity to use renewable energy (shell/fibre/EFB) in the estate with the present technology and facilities within the industry.</p>	Complied																								
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 and pollution are identified and documented in the Waste Management Action Plan. The compilation for 2023 was made at by the Sustainability Department applicable to the estates. Details of waste generated from the estates operations among others as shown below;</p> <table border="1"> <thead> <tr> <th>Type of waste</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Type of waste	Location			Complied																				
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Criterion / Indicator		Assessment Findings		Compliance	
		1	Domestic waste rubbish	Line sites, office, workshop, store,	
		2	Industrial waste-fertilizer bags	Empty bags store	
		3	Scrap metal	Workshop	
		4	SW 404 Clinical waste	clinic	
		5	SW rags, plastics, filters	Workshop	
		6	Spent lubricant & hydraulic oil	Workshop	
		7	Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW	Scheduled waste store	
		<p>The requirement is established, and the procedure documented under this subject titled;</p> <p>a) Landfill/domestic waste management GBP 12 dated 01/12/14 b) Scheduled waste management GBP 11 dated 11/08/20 c) Recyclable waste management GBP 13 dated 11/10/13</p> <p>The procedure has detailed the definition of solid waste. The types of solid wastes has been categorized as follows;</p> <p>a) Sisa pepejal komersial / pembinaan b) Sisa pepejal isi rumah / perindustrian c) Sisa pepejal keinstitusian d) Sisa pepejal import / awam</p> <p>in addition, there are Waste management 2023. In this plan activities as scheduled are monitored with the date/month recorded. This was sighted and verified. All landfill sites have signboard displayed and</p>			

Criterion / Indicator		Assessment Findings	Compliance												
		<p>properly demarcated. The area is sufficiently distant from habitation and water contamination. The site disposal area (landfill area) is shown and marked in the estates map.</p> <p>The estates also identified the types of domestic waste;</p> <ul style="list-style-type: none"> a) Sisa baki (Home domestic) b) Sisa pukal e.g., old furniture, electrical appliances. c) Sisa kitar semula (Recycled). <p>Inside the Management Plan the estate has included among others.</p> <ul style="list-style-type: none"> a) Identification of scheduled waste/ domestic waste. b) Process disposed domestic waste to the estate landfill. 													
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>The disposal/recycling of waste generated by the estates are made as follows:</p> <table border="1"> <thead> <tr> <th>Type of waste</th> <th>Location</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>Domestic waste rubbish</td> <td>Line sites, office, workshop, store</td> <td>Collection/disposal 2x/week to the estate designated landfill.</td> </tr> <tr> <td>Industrial waste-fertilizer bags</td> <td>Empty bags store</td> <td>Inventory of bags, reuse for LF collection, sell to appointed contractor for surplus quantity.</td> </tr> <tr> <td>Scrap metal</td> <td>Workshop</td> <td>Inventory maintained, tender at Regional level for sale to licensed contractors</td> </tr> </tbody> </table>	Type of waste	Location	Action to be taken	Domestic waste rubbish	Line sites, office, workshop, store	Collection/disposal 2x/week to the estate designated landfill.	Industrial waste-fertilizer bags	Empty bags store	Inventory of bags, reuse for LF collection, sell to appointed contractor for surplus quantity.	Scrap metal	Workshop	Inventory maintained, tender at Regional level for sale to licensed contractors	Complied
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Criterion / Indicator		Assessment Findings			Compliance
		SW 404 Clinical waste	Clinic	Inventory maintained. Storage in sharp bin in clinic. Disposal to Sedafiat Sdn Bhd	
		SW rags, plastics, filters,	Workshop	Inventory maintained. Storage in scheduled waste store. Disposal to Lagenda Bumimas Sdn Bhd	
		Spent lubricant & hydraulic oil	Workshop	Inventory maintained. Storage in scheduled waste store. Disposal to Lagenda Bumimas Sdn Bhd	
		Disposed containers, bags, equipment contaminated with chemicals, pesticides,	Scheduled waste store	Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by G Planter authorized vendor by Jabatan Pertanian via letter dated 04/1/2014.	
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>The procedures for handling used chemicals classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by Head Office personnel and implemented in all estates and mills for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows.</p> <p>a) Management of class 2 (and higher) chemical containers. b) Management of fertilizer bags.</p>			Major Non-conformity

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Criterion / Indicator	Assessment Findings	Compliance
	<p>The latest disposal of scheduled waste was conducted on 21/06/2023, the record as per below:-</p> <p>Consignment note 2023062110042PZI for SW 404 with total 0.002 mt at Sedafiat Sdn Bhd</p> <p>Consignment note 2023062112B6LWJN for SW 410 with total 0.08 mt at Lagenda Bumimas Sdn Bhd</p> <p>Consignment note 2023062112YAL594 for SW 408 with total 0.08 mt at Lagenda Bumimas Sdn Bhd</p> <p>Consignment note 20230621125HJGCL for SW 102 with total 0.03 mt at Lagenda Bumimas Sdn Bhd</p> <p>Consignment note 2023062110K6RJX3 for SW 305 with total 1 mt at Lagenda Bumimas Sdn Bhd</p> <p>As per inventory record for SW 305, date of generate was 20/11/2022 with total 50 liter</p> <p>As per inventory record for SW 408, date of generate was 29/11/2022 with total 10 kg</p> <p>The management already establish the standard procedure for Scheduled waste as per Doc no: SMP-GPB-11 rev: 2 dated September 2020. However, the during verification of the implementation sighted:</p> <ul style="list-style-type: none"> a) Scheduled waste items empty lubricant oil container being disposed at landfill area at Block 93. b) Sighted contaminated rags in the dustbin at workshop area. 	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>c) The oil trap at Scheduled waste area, sighted contaminated soil from oil trap been disposed at side of the oil trap and not disposed as scheduled waste.</p> <p>Thus, Major NC was raised during this assessment.</p>	
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>The guidelines and practice for handling empty pesticides containers are as established in the operational control procedure established as given in 4.5.3.3.</p> <p>a) All class 2 and above containers are tripled rinsed and holes punctured at the bottom only if the waste generator is to dispose as non-scheduled waste.</p> <p>b) Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process.</p> <p>These guidelines are based on Department of Agriculture ref 91/120/038/014 dated 7/11/2002. During the site visit this has been adhered mainly containers are tripled rinsed, and holes punctured at the container base. Empty containers were despatched to licensed buyer namely G Planter. Letter dated 04/1/2014 from Jabatan Pertanian refers.</p> <p>Latest disposal empty container was on 06/07/2023 at G-Planter as per latest UPPCR Collection Form. Total disposal was 315 empty containers.</p>	Complied
4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p>	<p>The domestic waste was disposed as per SOP Landfill and domestic waste management, SMP-GPB-12, Rev:01, Dated 1/12/2014). The locations of the landfill areas are at the respective estates shown below. All locations were adequately distanced from watercourses and housing complex minimum of 50 meters. Sample in Sabapalm estate</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																								
		the land was at block 93 where is far from housing and water source area.																									
Criterion 4.5.4: Reduction of pollution and emission																											
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	<p>The Environmental Improvement and Management plan was established at estates and reviewed annually. The following issues and mitigation program among others have been identified.</p> <table border="1"> <thead> <tr> <th></th> <th>Issues</th> <th>Mitigation program</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Surface water runoff</td> <td>Construction of terraces</td> </tr> <tr> <td>2</td> <td>Water quality</td> <td>Avoid fertilizer application close to waterways. Clear marking for buffer one area</td> </tr> <tr> <td>3</td> <td>Chemical application</td> <td>Planting of leguminous cover crop chemical reduction</td> </tr> <tr> <td>4</td> <td>Air quality</td> <td>Zero burning policy</td> </tr> <tr> <td>5</td> <td>Zero burning</td> <td>Zero burning policy, landfill site & recyclable waste</td> </tr> <tr> <td>6</td> <td>Fertilizer application</td> <td>Fertilizer application close to waterways</td> </tr> <tr> <td>7</td> <td>Waste management</td> <td>Proper landfill site and recyclable waste</td> </tr> </tbody> </table> <p>The GHG emissions due to the operations is identified and recorded in the RSPO palm GHG version 3.01. The GHG calculations were made as per certification unit basics.</p>		Issues	Mitigation program	1	Surface water runoff	Construction of terraces	2	Water quality	Avoid fertilizer application close to waterways. Clear marking for buffer one area	3	Chemical application	Planting of leguminous cover crop chemical reduction	4	Air quality	Zero burning policy	5	Zero burning	Zero burning policy, landfill site & recyclable waste	6	Fertilizer application	Fertilizer application close to waterways	7	Waste management	Proper landfill site and recyclable waste	Complied
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4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The action plan has been elaborated in 4.5.4.1 above.	Complied																								

Criterion / Indicator	Assessment Findings	Compliance															
Criterion 4.5.5: Natural water resources																	
<p>4.5.5.1 The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate. e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. <p>- Major compliance -</p>	<p>a) The Water Management Plan for the estates has been established. with latest review made on Jan 2023. The plan emphasized on the following areas.</p> <ul style="list-style-type: none"> - Water source - Efficient use of water - Renewability of water source - Avoidance of surface and ground water contamination <p>b) The monitoring of outgoing water was available conducted by Chemsain Konsultant Sdn Bhd dated 28/03/2023 as per Lab report no. CK/ML405/1510/23. The result as per below:-</p> <table border="1" data-bbox="1093 879 1868 1110"> <thead> <tr> <th>Parameter</th> <th>W1 (Sg labuk)</th> <th>W2 (Sg labuk)</th> <th>W3 (Sg labuk)</th> <th>Standard Limit</th> </tr> </thead> <tbody> <tr> <td>Total Coliform count</td> <td>23</td> <td>79</td> <td>13</td> <td>50,000</td> </tr> <tr> <td>Faecal coliform</td> <td><1.8</td> <td>13</td> <td><1.8</td> <td>5,000</td> </tr> </tbody> </table> <p>c) The management have establish the water management plan to optimize the water usage and nutrient usage. The plan to optimize or reduce the usage of water as per below:-</p> <ul style="list-style-type: none"> i) Take shorter showers ii) Check for and repair toilet leaks iii) install water saving shower heads 	Parameter	W1 (Sg labuk)	W2 (Sg labuk)	W3 (Sg labuk)	Standard Limit	Total Coliform count	23	79	13	50,000	Faecal coliform	<1.8	13	<1.8	5,000	<p>Complied</p>
Parameter	W1 (Sg labuk)	W2 (Sg labuk)	W3 (Sg labuk)	Standard Limit													
Total Coliform count	23	79	13	50,000													
Faecal coliform	<1.8	13	<1.8	5,000													

Criterion / Indicator		Assessment Findings	Compliance																		
		iv) Don't use the toilet as a wastebasket v) Fix dripping faucets d) Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Genting Plantations Bhd and DID guidelines in 2001). The buffer zones established are as following: <table border="1" data-bbox="1093 683 1753 884"> <thead> <tr> <th>1</th> <th>River width (Meters)</th> <th>Buffer Zone (Meters)</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>>40</td> <td>50</td> </tr> <tr> <td>3</td> <td>20-40</td> <td>40</td> </tr> <tr> <td>4</td> <td>10-20</td> <td>20</td> </tr> <tr> <td>5</td> <td>5-10</td> <td>10</td> </tr> <tr> <td>6</td> <td><5</td> <td>5</td> </tr> </tbody> </table> e) There was no natural vegetation in the riparian areas that has been removed. f) No bore well was using in estate sample.	1	River width (Meters)	Buffer Zone (Meters)	2	>40	50	3	20-40	40	4	10-20	20	5	5-10	10	6	<5	5	
1	River width (Meters)	Buffer Zone (Meters)																			
2	>40	50																			
3	20-40	40																			
4	10-20	20																			
5	5-10	10																			
6	<5	5																			
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	This is in compliance by the estates. This requirement is also audited internally by the Sustainability Department personnel. During the field visit no construction of such was observed.	Complied																		
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). - Minor compliance -	During the site visit practices of water harvesting are noted mainly constructed on flat areas in both estates. There was construction of WCP = Water Conservation Pit ratio of 1 ha to 34 points. Roadside pits were also available at every 3 palm rows, to divert in event of water overflowing and also to benefit the nearest palm at the pit end to obtain additional moisture. This is part of the common practices introduced within the Group Agriculture Procedures.	Complied																		

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			
<p>4.5.6.1</p>	<p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <ul style="list-style-type: none"> a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. <p>- Major compliance -</p>	<p>The assessment namely, "Inventory on HCV sites within Genting Plantations Berhad group estates (Sabah Region 1)" by S.K. Yap Forestry and Landscape Advisory Services on Oct 2009 – July 2010. Only HCV 4.2 and HCV 6 were identified at GSPE. Eg: Labuk and Bangkawat Rivers and burial grounds for local communities within estates. The reports were sighted and verified. The following aspects areas were assessed as to their state and management.</p> <ul style="list-style-type: none"> a) Area of HCV-Shared management of forest reserve and boundary areas/buffer zones. b) The presence of large mammals and birds and how they are protected from poaches. c) IPM: use of plants to attract <i>parasitoids</i> to control bagworms & barn owls for rats management and success d) Drainage and the conditions. Determining the presence of fishes as a bio-indicator of water health <p>The reports detail the findings of a rapid appraisal of the biodiversity in the estates and addresses the MSPO relevancy to biodiversity conservation and HCV. Therein being provided details relating to the following;</p> <ul style="list-style-type: none"> a) General biodiversity issues b) Watercourses and drainage c) Habitats natural and man-made d) Wildlife 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		e) Ponds and reservoirs f) Wetlands /watercourses g) Legal aspects h) Immediate and long-term effect.	
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> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p>- Major compliance -</p>	<p>There is no RTE or high biodiversity value at CU complexes except for reported presence of snakes, monkeys and wild boars. The management and monitoring plan for HCV areas was established and reviewed annually. There were displays of signage made at site i.e.</p> <p>a) No fishing, no manuring /no spraying, b) no spraying/ no hunting / no swimming c) Muslim & Christian cemetery signage).</p> <p>There were programs held by the estates to all employees in pertaining to the awareness of HCV areas and RTE species. Interview with the employees concluded that training and briefing made during the ad-hoc session and morning muster. This is also emphasized during the training held by the Sustainability Unit programs. Employees are aware of the following reminders;</p> <p>a) An offence to capture, harm, kills any wildlife. b) Disciplinary measures shall be taken if found violating company rules. c) Riparian buffer zone to be free from any chemicals application/pollution d) Relevant signs NO HUNTING NO FELLING ALLOWED</p>	Complied

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		Latest monitoring on HCV 4.2 and HCV 6 was available in Sabapalm estate, latest monitoring record was on 12/6/2023 and previously was on 10/03/2023 and 10/01/2023.										
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>The RTE assessment was incorporated in the HCV report and evaluation. Therein providing wildlife database categories of;</p> <ul style="list-style-type: none"> a) Birds / Mammals b) <i>Herpetofauna</i> / Conservation status c) Offence and penalties under Wildlife Conservation Act 2010. d) Provocation of wildlife. <p>In records there is no RTE species observed/spotted within the member estates in CU. Relevant action plans had been established and implemented concerning protection of the riparian, such as identification on map and ground, restriction of no chemical's activities, awareness training to workers and patrolling by Auxiliary Police. The estates reviewed the HCV management plan annually in -Jan/Feb 2023.</p> <table border="1"> <thead> <tr> <th></th> <th>HCV area</th> <th>Management & Monitoring</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Protected areas</td> <td>Boundary markers estate/forest reserve Signage on no illegal hunting/collecting & no authorised entry</td> </tr> <tr> <td>2</td> <td>RTE</td> <td>Patrol the boundary area Inform all stakeholders on HCV assessment and protection Education & awareness for workers Ensure no agrochemicals activities at bordering water bodies</td> </tr> </tbody> </table>		HCV area	Management & Monitoring	1	Protected areas	Boundary markers estate/forest reserve Signage on no illegal hunting/collecting & no authorised entry	2	RTE	Patrol the boundary area Inform all stakeholders on HCV assessment and protection Education & awareness for workers Ensure no agrochemicals activities at bordering water bodies	Complied
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Criterion / Indicator		Assessment Findings		Compliance
		3	<p>Sacred sites</p> <p>Clear demarcation and proper fencing at identified HCV Inform community concerning utilisation of site To maintain cleanliness / upkeep of areas Maintain a buffer in order to secure the areas from fire and other disturbances To include areas in HCV map</p>	
		4	<p>Ecosystem</p> <p>Place clear boundary markers between estate and forest reserve. Place signage on no illegal activities Patrol boundary areas within forest reserve regularly Socialise the HCV assessment consisting of identification management and monitoring to all employees Information to stakeholders on the HCV</p>	
Criterion 4.5.7: Zero burning practices				
4.5.7.1	<p>Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.</p> <p>- Major compliance -</p>	<p>There was no land preparation in the Estates CU by burning ever since Genting Plantations practice zero burning as per the policy in the Zero Burning Policy dated 10/8/11 signed by the President & Chief Operating Officer. Therein stating</p> <p>a) No open burning of any kind in all OU b) All types of waste products disposed appropriately c) Limited open burning allowed for cooking and religious purposes under appropriate supervision.</p>		Complied

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Criterion / Indicator		Assessment Findings	Compliance
		In the 2020, 2021 and 2022 replants visited during the audit in CU it was evident that all palms were felled, shredded, windrowed and left to decompose.	
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance -	N/A. Details in 4.5.7.1 above	Not applicable
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	N/A. Details in 4.5.7.1 above	Not applicable
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	This is included in the specification of work orders in event of land preparation during a replanting. It is a standard practice in Genting Group and within the industry. However, there are variations of practices between inland and coastal estates. Trunks are felled and chipped without having to shred and windrowed in certain conditions. Adjustment of work if any are finalized from the directive of the Regional Office/Head Office.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	The estates operations are guided by the following manuals. a) Genting Plantations Oil Palm Manual OPM issued on 9/11/99 updated June 2013.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Land preparation/nursery/planting/soil conservation/ - Pest & Disease/weeding/fertilizer application/harvesting - Managing difficult soils/crop forecast <p>b) Sustainability Management Procedure Manual 1/8/13 revised in 7/2/19.</p> <p>c) OSH Manual dated 1/1/2010.</p> <p>d) Environmental Control Procedure – 01/9/2018</p> <p>e) Store Operating Manual – 2014</p> <p>f) Standard Operating Procedure Malaysia Estates rev 2 (Dec 10) rev 3 (Oct 13)</p> <p>g) Jobs description - 2012</p> <p>The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections</p> <ul style="list-style-type: none"> a) OPM No 7. Manuring of oil palm b) OPM no 13. Managing difficult soils <p>The procedures as documented in the manuals and SOPs were disseminated to the staff/workers through morning briefings and training. The manuals are kept in the main office for references of employees particularly for the supervisory personnel. Field inspection and interviews with the workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs. The SOPs included the operation activities from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt.</p> <p>Sabapalm Estate at Klagan and Kwan Division had a total of 1334.30 ha. The site was visited and adopted the GPB guidelines of peat soil</p>	

Criterion / Indicator		Assessment Findings	Compliance																																																		
		<p>management ref OPM 13 dated April 2021 among others including the following;</p> <p>a) Water management to retain the desired water level 55cm-60 cm b) Peat subsidence level annual recording</p> <p>The monitoring of peat soil subsidence was guided by the following;</p> <p>a) Item 3.1 – Optimal Water Levels for Coastal/Peat Soil and b) Item 6.0 – Peat Soil Subsidence installation / monitoring.</p> <p>The estate monitored water levels using water level markers in drains and water tubes for ground water levels. Records relating to peat management as sampled verified for the estate are as follows;</p> <p>a) Map showing location of peat subsidence pole PSP b) Peat Subsidence Monitoring - measurement in cm</p> <table border="1"> <thead> <tr> <th></th> <th>Month</th> <th>Point no 2 (Field 68A)</th> <th>Point No 5 (Field 95)</th> <th>Point no 4 (Field 83)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>27/09/2022</td> <td>0</td> <td>-</td> <td>-</td> </tr> <tr> <td>2</td> <td>27/07/2022</td> <td>-</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p>Piezometer monitoring record</p> <table border="1"> <thead> <tr> <th></th> <th>Field no</th> <th>24/06</th> <th>01/06</th> <th>08/06</th> <th>15/06</th> <th>22/06</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Field 67</td> <td>55</td> <td>65</td> <td>65</td> <td>65</td> <td>65</td> </tr> <tr> <td>2</td> <td>Field 68A</td> <td>55</td> <td>60</td> <td>60</td> <td>60</td> <td>60</td> </tr> <tr> <td>3</td> <td>Field 95</td> <td>50</td> <td>50</td> <td>55</td> <td>55</td> <td>55</td> </tr> <tr> <td>4</td> <td>Field 83</td> <td>50</td> <td>50</td> <td>55</td> <td>55</td> <td>55</td> </tr> </tbody> </table>		Month	Point no 2 (Field 68A)	Point No 5 (Field 95)	Point no 4 (Field 83)	1	27/09/2022	0	-	-	2	27/07/2022	-	0	0		Field no	24/06	01/06	08/06	15/06	22/06	1	Field 67	55	65	65	65	65	2	Field 68A	55	60	60	60	60	3	Field 95	50	50	55	55	55	4	Field 83	50	50	55	55	55	
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2	Field 68A	55	60	60	60	60																																															
3	Field 95	50	50	55	55	55																																															
4	Field 83	50	50	55	55	55																																															
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to	The estates construct terraces at slope area of more than 6 degree if any. Planting of cover crop are made to retain the soil structure and	Complied																																																		

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Criterion / Indicator		Assessment Findings	Compliance
	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 -	conservation. Road side pit are made to divert water at slope areas to prevent road erosion and surface damage. Terraces are constructed inclined towards the terrace wall. All the 3 estates visited had land terrain of flat to undulating category.	
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	All fields are marked and identified. Information among others i.e. a) Block number b) Year of planting (field no) c) Type of clone d) And the total hectare is shown in all markers. There are both stencilled at the palm trees and also displayed in signage at the boundary/corners of every field. This is observed during the field visit.	Complied
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	The estates audited possessed a similar budget format to the mill. Inclusive there is also a 5-year budget/forecast financial plan 2022-2026 allocating categories among others; a) Hectarage statement and crop production b) Total planted area mature & immature c) Crop yielding area d) Mature cost - Weeding/drainage/pest - Supplying/roads/bridges/paths/road - Terracing/pruning/sanitation	Complied

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Criterion / Indicator		Assessment Findings	Compliance														
		e) Manuring/harvesting & Collection/Weeding f) Transportation /depreciation/General Charges g) Cost/ha & cost /mt FFB h) CAPEX Separately the cost of immature areas is also shown which among others comprises of the following items; a) Labour statement / Allocation of wages / Labour benefit summary b) Yield statement oil palm c) Summary of vehicle and running schedule / Job allocation for vehicles d) Summary of workshop running schedule e) Summary of budget f) Summary of general charges g) CAPEX The five years planning horizon 2023-2027 is available.															
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance -	The replanting programs for the estates are compiled as follows. The programs are reviewed on an annual basis which is subject to amendment. All figures in hectares otherwise stated. <table border="1" style="margin-top: 10px;"> <thead> <tr> <th></th> <th>Year</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>GSPE</td> <td>227.07</td> <td>238.28</td> <td>231.22</td> <td>160.17</td> <td>-</td> </tr> </tbody> </table> Sizes of fields identified for replanting varies subject to factors i.e. hilly, yield etc. All replanting program and planning in all the Group Estates are monitored by the Head Office. Assistance and visits are performed by GM for the approval of hectares, stand per ha etc.		Year	2023	2024	2025	2026	2027	1	GSPE	227.07	238.28	231.22	160.17	-	Complied
	Year	2023	2024	2025	2026	2027											
1	GSPE	227.07	238.28	231.22	160.17	-											

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.2.3 The business or management plan may contain:</p> <ul style="list-style-type: none"> a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment <p>- Major compliance -</p>	<p>This requirement i.e., crop material, crop projection, yield, production cost is available. It is provided in the business management plan shown in item 4.6.2.1 above. The financial indicators: cost benefits, discounted cash flow, return on investment details are managed and kept in confidentiality at the Head Office level. The estates managed the financial elements through guidance of the approved budget. Deviations are sought to the higher superior level for any additional vote and projects if necessary.</p> <p>The estates possessed a 5-year budget/forecast financial plan 2022-2026 allocating categories among others:</p> <ul style="list-style-type: none"> a) Crop yielding area b) Mature cost c) General charges/upkeep/collection/depreciation d) Cost/ha & cost /mt FFB e) CAPEX <p>Separately the cost of immature areas is also shown which among others comprises of the following items:</p> <ul style="list-style-type: none"> a) Labour statement / Allocation of wages / Labour benefit summary b) Yield statement oil palm c) Summary of vehicle and running schedule / Job allocation for vehicles d) Summary of workshop running schedule e) Summary of budget/CAPEX f) Summary of general charges 	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
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 -	The estates performance are recorded in the monthly progress report. Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein. a) The management also provides variance report on the performance and reviewed on a monthly basis. b) The supervisory personnel maintained a daily cost for the field operations. c) The Regional meeting involving the Managers sits monthly with the Head Office, higher management for the performance review.	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 lodged by any suppliers or service providers with regards to the pricing mechanism.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Verification of payment advice for he sampled contractors 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. Interview with contractors also confirmed that payment was made promptly.	Complied
Criterion 4.6.4: Contractor			

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Criterion / Indicator		Assessment Findings	Compliance
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	The contractors engaged by the estate management have 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.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Signed contract agreements between the company and the contractors were available for verification. All the agreements were still valid at the point of this assessment.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	The company 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 estate 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			

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Criterion / Indicator		Assessment Findings	Compliance
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance -	Not applicable as no development of new planting.	Not applicable
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia’s National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance -	Not applicable as no development of new planting.	Not applicable
Criterion 4.7.2: Peat Land			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	Not applicable as no development of new planting.	Not applicable
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	Not applicable as no development of new planting.	Not applicable
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations,	Not applicable as no development of new planting.	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
	via participatory methodology which includes external stakeholders. - Major compliance -		
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	Not applicable as no development of new planting.	Not applicable
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -	Not applicable as no development of new planting.	Not applicable
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 -	Not applicable as no development of new planting.	Not applicable
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	Not applicable as no development of new planting.	Not applicable
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	Not applicable as no development of new planting.	Not applicable

Criterion / Indicator		Assessment Findings	Compliance
	shall be avoided unless permitted by local, state and national laws. - Major compliance -		
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	Not applicable as no development of new planting.	Not applicable
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	Not applicable as no development of new planting.	Not applicable
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 -	Not applicable as no development of new planting.	Not applicable
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	Not applicable as no development of new planting.	Not applicable
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made	Not applicable as no development of new planting.	Not applicable

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

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

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 Plantations Berhad has developed Malaysian Sustainable Palm Oil (MSPO) Policy, version dated 18/03/2014 signed by President & Chief Operating Officer, Mr. Yong Chee Kong. The company ensure compliance with MSPO and the MPOB Code of Practice requirements. The policy was communicated to internal and external stakeholders through various means such as briefing during morning muster, display on notice boards, and stakeholder’s consultation meetings, to name a few.	Complied
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	In the above-mentioned policy, the company is committed to continue to assess and develop new and innovative techniques, approaches and practices with the objective of continuous improvement in the journey towards achieving sustainable palm oil.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Based on procedure, the internal audit was planned to be conducted at least once a year. The last internal audit was conducted on 19-21/06/2023 by two internal auditors sourced from the Sustainability Dept. Based on the internal audit report and checklist, the internal audit had sufficiently covered all the requirements of the standard.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of	Internal audit process is guided by Sustainability Internal Audit procedure [SMP-GBP-03, rev. 7, dated 13/06/2022]. There were 3	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	major NCRs, 1 minor NCRs, and 4 observations raised as a result of the internal audit. The operating unit has identified the root-cause to establish the appropriate correction and corrective actions.	
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The internal audit report was well maintained at the office and made available for verification. The results and status of corrective action were also one of the agenda of the management review meeting.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	A combined management review meeting between the mill and estate was last conducted on 07/07/2023. It was chaired by the VP Plantations – R2, Abdul Rahim Wilson and attended by 11 key personnel such as SEM, MM, SAM, AM, ME, doc controller, CC, Sustainability Manager & Executive. Among the agenda discussed and recorded in the minutes were: 1) Status of outstanding issues from previous meeting 2) Changes, improvement, or modification of the sustainability management system 3) Internal and external audit findings on sustainability mgt sys 4) Complaints, grievances, and enquiry book/record 5) Stakeholder meeting report/minutes 6) Greenhouse value (specific to ISCC, RSPO, MSPO) 7) Review continual improvement status & its recommendations 8) Review on resource & training requirements 9) Review on sustainability policy and its objective status	Complied

Criterion / Indicator		Assessment Findings	Compliance																		
		10) Review of effectiveness in achieving quality, environmental, social, safety, and health 11) Compliance status on legal and other requirements 12) Preventive and corrective actions 13) Follow up actions from management review 14) Changes that could affect the management system 15) Customer feedback 16) Recommendations for improvement 17) Any other matters																			
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 -	The mill had the following projects in the forthcoming 5 years in the CAPEX as part of the process continuous plan. <table border="1" data-bbox="1048 938 1809 1141"> <thead> <tr> <th></th> <th>Section</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Social</td> <td>1/5 Block of 1x4 staff quarters - New</td> </tr> <tr> <td>2</td> <td>Social</td> <td>14 New block of Labour quarters</td> </tr> <tr> <td>3</td> <td>Operations</td> <td>Replaced 6/16 units 1.5mt FFB cages</td> </tr> <tr> <td>4</td> <td>Operations</td> <td>One unit vibrating screen motor</td> </tr> <tr> <td>5</td> <td>Safety</td> <td>Replacement -workshop & Store roofing</td> </tr> </tbody> </table> The mil has established the continuous improvement plan in consideration of environmental and social impacts. Among the sampled continuous improvement plan as follows a) To receive and act on any environmental complaints through internal and external communications b) Reuse production waste for process stability		Section	Details	1	Social	1/5 Block of 1x4 staff quarters - New	2	Social	14 New block of Labour quarters	3	Operations	Replaced 6/16 units 1.5mt FFB cages	4	Operations	One unit vibrating screen motor	5	Safety	Replacement -workshop & Store roofing	Complied
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5	Safety	Replacement -workshop & Store roofing																			

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Criterion / Indicator		Assessment Findings	Compliance
		c) Supply biomass waste as fertilizer for estate/mill d) Recycling of bunch ash as fertilizer e) To build up and maintain good relationship with stakeholder and surrounding communities via program conducted by oil mill	
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the GM and higher Head of Department are transacted during the monthly Managers meetings and emails. Provision of machine and other major requirement are made in CAPEX budget.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	Genting Plantations Berhad has developed Procedure for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 08/01/2018 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. The procedure has been briefed to the internal and external stakeholders. Briefing to the external stakeholders was conducted during the stakeholder meeting conducted on 27/05/2023. Issues raised and actions taken during the	Complied

Criterion / Indicator		Assessment Findings	Compliance
		stakeholders meeting were well recorded in a management plan and made available for verification.	
4.2.1.2	<p>The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>Genting Plantations Berhad has developed Procedures on 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. Based on the procedure, the list of documents which are publicly available as follows:</p> <ul style="list-style-type: none"> • Company annual report • Group policies • Reports related to environment such as EIA, EAI • RSPO external audit reports • Pollution prevention plan • Continuous improvement plan • Complaints and grievances book and its procedure • Negotiation and compensation procedure • Sexual harassment procedure <p>Genting Sabapalm Estate 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> <ul style="list-style-type: none"> • Land title • Policies • Reports – EAI, SIA, HCV and audit reports • Management plans 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> Procedures <p>The stakeholders were briefed on the request and response during the stakeholder meeting conducted on 27/05/2023.</p>	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>Genting Plantations Berhad has developed Procedure for Consultation and Communication with Doc. No.: SMP-GPB-17, Rev. 02 dated 08/01/2018 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.</p>	Complied
4.2.2.2	<p>The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i>.</p> <p>- Minor compliance -</p>	<p>Genting Plantations Berhad has appointed the Mill Manager as management representative for ISCC, RSPO and MSPO related matters as per appointment letter dated 03/01/2022 signed by Vice President-Mill.</p>	Complied
4.2.2.3	<p>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.</p> <p>- Major compliance -</p>	<p>Stakeholder list for Genting Sabapalm Oil Mill was made available for verification. The stakeholders such as contractors, suppliers, local communities, and government authorities were included into the list.</p> <p>A stakeholder meeting was conducted on 27/05/2023. Stakeholders such as local communities, local authorities, contractors, and suppliers were invited and attended the meeting. Meeting minutes were made available for verification.</p>	Complied
Criterion 4.2.3 – Traceability			

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Criterion / Indicator		Assessment Findings	Compliance
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance -	An SOP has been established SOP for traceability and documented in Genting Plantations Berhad, Sustainable Management Procedure Manual SMP-GPB-33 revision 00 dated Sept 2020: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability. Therein describing information of FFB flow chart from harvesting designated block to mill weighbridge (tickets).	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The estates monitor the despatch to the mill on daily basis to tally and tracking the volume harvesting and tonnage despatch to the mill. Factors on the FFB balances in the fields are accounted for in the process. Other records include daily FFB harvested and dispatched and summary in the monthly yield statistics. The daily despatch to the mill is checked vs the received with the monitoring of the weight differences. The latest record Self audit assessment on Sabah Mills Operational Visit program dated 23 -24/06/2023.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	Appointment letter was available for Nurul Aniza Samsudin dated 01/08/2020. Appointed by Sabapalm POM Manager Genting Sabapalm Yee Chee Fui. Duties among others include the following: a) To ensure quality and environmental systems. b) To ensure test equipment is in order and functional. c) To ensure products meet customers targets and quality. d) To ensure all requirement in SCCS are complied with. All appointed letters were sighted and verified.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	The FFB weighbridge ticket/despatch notes are produced for all transaction to Sabapalm Oil Mill. The set of document consists of the following information among others. As per sample in 4.2.3.1 the	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>record of sales and delivery was available as per below information was verified: -</p> <p>CPO Despatch Contract no.: SGOMS/CPO/2306/S03 Quantity: 550 mt Dated: 21/06/2023 Weighbridge Ticket: 080429 Weight: 27,340 kg Vehicle no: SAB4511N</p> <p>Kernel Despatch Contract no.: SGOMS/PK/2306/S01 Quantity: 150 mt Dated: 01/07/2023 Weighbridge Ticket: PK23000017W Weight: 3`,130 kg Vehicle no: SS4488X</p>	
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.	The Mill continued to comply with legal requirements. Compliance to each applicable law and regulation is monitored by estate management, Regional Office and Sustainability Department. The	Major Non-conformity

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Criterion / Indicator	Assessment Findings	Compliance
<p>- Major compliance -</p>	<p>licenses and permits governed by the Local, State and Federal authorities among others as shown below:</p> <ul style="list-style-type: none"> - License for MOPB license was available under 620051004000 for processing and transfer was valid from 09/02/2023 until 29/02/2024. - License from Suruhanjaya Tenaga for electricity installation with compliance to installation not more than 1810 kilowatt was valid from 22/03/2023 until 21/03/2024. - License for petrol storage (RON 95) from KPDNHEP for 200 liter was available as per KPDNHEP.SDK.38/2022(PK) valid until 24/04/2024. - License for Diesel storage (Euro 2M) from KPDNHEP for 36,400 liter was available as per KPDNHEP.SDN.18/2021(PK) valid until 29/09/2024. - License for salary deduction for Passport renewal (dependent) was available and valid until 29/06/2023. Already renewal the license as per record 19/04/2023 (JTK.H.SDK.600-14/1/5/509(20)) and still pending at JTK department. <p>However as per Industrial Code of Practice for Safe Working in a Confined Space 2010 under clause 11. Health requirement of persons working in confined space stated that the employer shall ensure that his authorised entrant intending to work in confined space are certified physically and mentally fit determined by an occupational health doctor. However, found no record of health declaration for 2 worker that enter the confined space (Kernel Bunker) as per PTW implementation dated 05/02/2023 Kernel bunker cleaning thus Major NC was raise during this audit.</p>	

Criterion / Indicator		Assessment Findings	Compliance
		As per Jadual Pematuhan under No 005261 under clause 16. Stated Pengawasan kualiti air sungai yang terletak berhampiran dengan kilang hendaklah dijalankan dengan mengadakan 2 takat percontohan (dipersetujui oleh Jabatan Alam Sekitar) iaitu di hulu dan di hilir takat pelepasan efluen pada setiap bulan bagi pelepasan alur air. However, the sampling point for mill has yet to be endorsed by the DOE as per requirement. Thus, major NC was raised during this assessment.	
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -	The Legal Requirements Register (LRR) covers all the necessary regulatory requirements. The LRR for was reviewed annually. The list of applicable legal and other requirements was made available during the assessment and complied in the Sustainability Management Procedure Manual SMP-GPB-22 having revision no. 6.	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 -	The Sustainability Department (SD) based Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills. SD which is based in <i>Wisma Genting</i> is responsible for tracking any changes to the Acts and Regulations. In addition, the SVP Processing (Malaysia) also played a role in disseminating new Acts & Regulations to all the estates in the Group. a) This was made via communication with the publisher of the documents. b) This mechanism was outlined in the procedure. c) The updating of the legal register is made on a periodical basis. d) Changes in the legal register if any are communicated to the respective regions. e) The mill had entirely adopted the GPB established documented system for identifying, tracking, accessing and updating the legal	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		requirements. It had ensured that all applicable legal requirements pertaining to MSPO are established, implemented and maintained.	
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - Minor compliance -	The Mill Manager appoints the Surianti Mayah have been appointed by the Mill Manager dated 01/02/2020. Respective letter was sighted and verified.	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	Genting Sabapalm Oil Mill is located inside of the land of Genting Sabapalm Estate, Title No. Country Lease 085319231. The land is belonged to Genting Plantations Berhad. The mill occupies about 27 Ac of the land and bound under a tenancy agreement between Genting Plantations Bhd and Genting Oil Mills (Sabah) Sdn Bhd dated 01/01/2022. The agreement is valid until 30/06/2024.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	Genting Sabapalm Oil Mill is located inside of the land of Genting Sabapalm Estate. The land is belonged to Genting Plantations Berhad.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The mill is located in the Sabapalm Estate. It is separated by means of fencing and effluent. The mill operates under Sabapalm Estate land title.	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).	There is no land dispute in the Genting Sabapalm Oil Mill at the time of audit. Genting Plantations Berhad has the right to use the land through possession of land titles. Interview with the local communities confirmed that no land encroachment or land dispute reported. Thus, this Indicator is not applicable.	Not applicable

Criterion / Indicator		Assessment Findings	Compliance
- Minor compliance -			
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	NA as there is no land encumbered by customary rights.	Not applicable
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	NA as there is no land encumbered by customary rights.	Not applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	NA as there is no land encumbered by customary rights.	Not applicable
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social 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 last reviewed in August 2022 for both Genting Sabapalm Oil Mill and Genting Sabapalm 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 interviewed. Social Management and Monitoring Plan of Genting Sabapalm Mill was reviewed and last updated in March 2023.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 -	Genting Plantations Berhad has established Complaints and Grievances procedure with Doc. No.: SMP-GPB-19, Rev. 04 dated March 2020 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 maintenance of housing facilities. Based on verification of the complaints/grievance records, all the issues were resolved in appropriate manner. Nonetheless, the recording of complaints which were received through verbal can be further improved by registering them in the "Complaints/Grievance and Enquiry Record Book", therefore the progress of action taken can be effectively monitored and followed up (OFI).	Opportunity for improvement
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	The Complaints/Grievances Record Book serves as complaint forms and made available in the office. Apart from that, complaints can also be lodged through a suggestion 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 surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.	Briefing to the external communities was conducted on 27/05/2023 during the stakeholder meeting. Interviewed with the external	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	stakeholders confirmed that they are aware of the complaint procedure.	
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	The records of complaint for the past 24 months i.e., since July 2021 were well maintained and made available for verification.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance -	Among the notable contributions to local development given by the estates and mill are as follows: - Providing manpower and machines for repairing and maintenance works at nearby communities such as schools, Klinik Desa, Police Station, villages, etc. - Miscellaneous donations to support schools' events	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. - Major compliance -	The Occupational Safety and Health Policy was established, signed by President and Chief Operating Officer on 01/07/2018. The policy was communicated during Policy briefing from time to time. The policy was displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH personnel from Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors. In interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the policy. Communication to worker have been	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		conducted yearly basis, latest policy has been communicated was on 01/03/2023.	
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 Labelling) 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 	<ul style="list-style-type: none"> a) The safety and health policy have been communicated and implemented as per below record training dated 11/03/2023. b) HIRARC was available as per referred SP-MGR-01-F01-0 Rev 02, Issue date 18/2/2022. This HIRARC already included all activity such as steriliser, weighbridge, FFB grading, Loading ramp, Kernel plant, etc. Noise Risk Assessment Report (SSS/NOISE-301/21) conducted on 15-16/04/2021 by Gabriel Sherman Zabala (HQ/14/PEB/00/125) from Sherman Services & Supply. The management already conducted audiometric test dated 17/04/2023 with total 41 workers phase by phase at DAB OH Sdn Bhd. The result there are 2 workers with abnormal audiogram. The management already repeated the abnormal on 24/06/2023. CHRA also have been conducted on 23/11/2020 as per report RSSB/CHRA/2020-038 by REHPRO Scientific Sdn Bhd. Found the implementation the medical surveillance programme 2022 at DAB OH Sdn Bhd dated 26/09/2022. The total workers that involve was 13 workers. All workers fit to work with chemical. c) The training and awareness programme was based on training need analysis conducted by the management team. Each training already been decided through training needs and plan (refer PM-MGR-05-F01-0) dated 2023. The record below was training have been conducted base on their work;- QESH Policy, RSPO, MSPO and awareness programme dated 20/01/2022 	<p>Opportunity for improvement</p>

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Criterion / Indicator	Assessment Findings	Compliance
<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>Handling of used chemical dated 17/05/2022</p> <p>Personal Protective Equipment dated 04/04/2022</p> <p>Handling of tools & Equipment/ PTW dated 04/04/2022</p> <p>Training using Emergency Shower dated 17/05/2022</p> <p>Tyre pump procedure safety training dated 29/10/2022</p> <p>Lock Out Tag Out Training dated 16/07/2022</p> <p>d) The mill has provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC requirements. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>e) The following manuals contained SOP for chemical handling and used as a procedure in handling chemicals. SOP (safety working instruction) SOP-PRD-14 dated 30/6/2019, to handle the chemical for water testing must be handle by competent person with proper PPE and the test must be conduct at specific area as per requirement. Both were issued from Head Office and used in all operating units within the Group. SDS were kept in the file and workplace through verification during interview.</p> <p>f) The responsible person(s) for workers' safety and health as per letter dated 01/04/2023. There also committee that mill manager already appointed with total 17 person. This included employer representative and employee representative.</p> <p>g) The management already conducted regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and</p>	

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		<p>welfare are discussed openly. Latest record in GSOM was 23/06/2023 and previously was on 17/03/2023.</p> <p>h) Genting Sabapalm POM has site specific Plans in the OSH Manual (OM-GPB-04, Rev:0, Dated 1/1/10) including ERP for accident, ERP for Fire, ERP for chemical spillage, maps showing assembly areas and up to date lists of emergency contacts with training conducted to communicate the Plan.</p> <p>i) First aid Training been given by DAB OH Sdn Bhd dated 19-25/02/2022. This course title Basic Life Support & 1st Aid Training attended by 3 person and valid for 3 years as per certificate of each person attended.</p> <p>j) JKPP 8 was available dated 07/01/2023 under document name JKPP8/121498/2022 with LTA 0.00.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p>- Major compliance -</p>	<p>Genting Plantations Berhad 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. Communication to the employees was done in various methods such as briefing during morning muster, display on notice boards and training. Interview with workers showed that they have a good understanding on human rights.</p>	Complied
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p>	<p>The company is committed to ensure all the employees are treated equally regardless of race, nationality religion, gender, age, and other political opinions. Interview with the workers showed that no discrimination is being practiced.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>There was no trade union at the mill. Nonetheless, workers were aware that there is no restriction for them to join any union. 10 workers were sampled for the appropriateness of their employment contract and pay slips. Based on verification of pay slips and interview with the workers, the pay and conditions were found to be meeting the legal minimum standard and in-line with the employment contracts.</p>	Complied
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>The contractors engaged by the mill were only on project basis. There were no contractors hired for routine operational or processing works.</p>	Complied
4.4.5.5	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The mill is maintaining the data base of all their registered workers in the Lintramax system. Among the information available in the system was name, employee no., date joined, gender, date of birth, and type of work, to name a few.</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>Employment contract is provided for every worker which is signed by the employer and employees. Based on verification of the contract contents, the stipulated terms & conditions found to be fair. 10 samples of employment contracts verified, and based on interview, the workers had voluntarily signed the contracts and they were also made to understand the contents by the management.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	The working hours are recorded using punch card system where the attendance can be verified through the punch card of individual workers. The time enter, break time and exit of work were also clearly stated in the punch card. Verification on the system and pay slips confirmed that the attendance was accurately recorded.	Complied
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. - Major compliance -	Based on the records review of the Punch card of sampled workers it was found that the entry time and exit time which were clearly stated in the punch card, conformed to the terms and conditions stipulated in the collective agreement. Nonetheless, the written agreement between the mill and the female employees with regards to working at night can be further improved by stating more details such as the time defined under "working at night" and date of agreement signed (OFI).	Opportunity for improvement
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 -	Documented payslips were given to each worker on pay day, which is not later than 7 th of every month. Wages and overtime were paid according to the attendance record which includes the total hours of overtime and daily attendance. Among the information available in the payslip was name of workers, itemised details of income, itemised details of deduction, no. of turn-out days, no. of absent days, and nett income to name a few.	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 -	Among other benefits offered to the employees were outturn incentive, productivity incentive, and medical clinic. Quarters were also equipped with sport facilities and place of worship.	Complied

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<p>4.4.5.11 In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p> <p>- Major compliance -</p>	<p>The estate management has provided free housing facilities to all the workers. Basic amenities such as water and subsidised electricity were provided to the workers. Housing inspection is carried out fortnightly by the Estate Hospital Assistant. Based on verification of the inspection records, any issues identified were recorded and appropriate actions were taken accordingly. Nonetheless, the availability of the fire extinguishers at the workers quarters can be further improved especially during the period they are handed over to the service provider (vendor) for maintenance (OFI).</p>	<p>Opportunity for improvement</p>
<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>Genting Plantations Berhad has 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.</p> <p>Procedure on Prevention and Eradication of Sexual Harassment at the Workplace was established with Doc. No.: SMP-GPB-20, Rev. 1 dated 11/01/2023. Process of handling sexual harassment complaint was outlined in the procedure. There was no case of sexual harassment and violence reported.</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 was no trade union in the mill. 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.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. - Major compliance -	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 and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance -	All employees and contractors are appropriately trained. Training matrix and training programme for 2022/23 was established by the estates’ management.	Complied
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	The Mill has established the training program for the engineer, workers and contractors base on training need analysis conducted. The training need analysis was documented in Training Matrix analysis. The analysis was based on job designation and type of training needs for the employee. The training type was divided into 3 types, Core training, non-core training – theoretical training and non-core training – theoretical and hands on training. The training has been identified and already put for planning. Verification on training record for year 2023 as per below: HIRARC New Risk Management Regulation dated 27/06/2023 Scheduled waste management dated 18/05/2023 Handling of tools & equipment, PTW and SOP on oxygen dated 17/04/2023 Procedure and induction of handling new worker contractor dated 17/03/2023	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.4.6.3	<p>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>The POM has training program which updated annually based on training need analysis. The training identified were programmed throughout the year dated Jan 2023. All workers involved in the operations have been adequately trained in safe working practice. The mill has a comprehensive annual training plan for its staffs and workers, and this was sighted in the training records file for each staff and workers.</p>	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	<p>An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>The Group Environmental Policy had been established and implemented for all Mills and Estates. The policy was signed by the President / Chief Operating Officer of Genting Plantations Bhd dated 21 Dec 2009 and displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented along with other Policies through the OSH activities by the on-site Safety Officers and monitored by OSH/Sustainability Unit from Head Office. Included in the Policy among others are the following commitment.</p> <ul style="list-style-type: none"> a) Commitment and protection of the environment according to the applicable laws. b) Establishment of environmental management plan developed from results of aspect and impact analysis, mitigation, monitoring plans and records of implementation with timelines. c) Continual improvement program. d) Awareness through training / briefing program & session to all employees and stakeholders. 	Complied

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Criterion / Indicator		Assessment Findings	Compliance																														
		During interviews with the workers and staff during the site visit revealed that the employees had been																															
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 identified the environmental objectives for implementation base on evaluation of aspect and impact of environment by the management. Latest review aspect and impact was on 15/05/2023 as per SP-MGR-02-F01-00.	Complied																														
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 -	<p>Stack emission Monitoring report for Lab Fume Hood (Chimney No 1) assess by DYNAKEY Laboratories Sdn Bhd dated 06/06/2023 referred report GSOM/ST-FMT/2023/1. Result as per below:-</p> <table border="1"> <thead> <tr> <th>Description</th> <th>Test result</th> <th>Limit as per 2nd Scheduled Regulations 13 of the EQA (Clean Air)</th> </tr> </thead> <tbody> <tr> <td>Emission Load</td> <td>0.0027 mg/m3</td> <td>150 mg/m3</td> </tr> </tbody> </table> <p>OER for license 001878 JAS.SSK.600-3/1/3 for 2nd Quarter (01/04/2022 – 31/06/2023). Result as per below;-</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>02/04/2023</th> <th>02/05/22023</th> <th>01/06/2023</th> </tr> </thead> <tbody> <tr> <td>pH value</td> <td>8.30</td> <td>8.10</td> <td>8.00</td> </tr> <tr> <td>BOD</td> <td>418</td> <td>293</td> <td>245</td> </tr> <tr> <td>COD</td> <td>1400</td> <td>1600</td> <td>2300</td> </tr> <tr> <td>Total Solid</td> <td>4940</td> <td>5395</td> <td>6285</td> </tr> <tr> <td>Oil and Grease</td> <td>9.80</td> <td>3.60</td> <td>12.40</td> </tr> </tbody> </table>	Description	Test result	Limit as per 2 nd Scheduled Regulations 13 of the EQA (Clean Air)	Emission Load	0.0027 mg/m3	150 mg/m3	Parameter	02/04/2023	02/05/22023	01/06/2023	pH value	8.30	8.10	8.00	BOD	418	293	245	COD	1400	1600	2300	Total Solid	4940	5395	6285	Oil and Grease	9.80	3.60	12.40	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 -	This is available and compiled and incorporated in the details as provided in 4.5.1.3 above.	Complied																														

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Criterion / Indicator		Assessment Findings	Compliance																																											
4.5.1.5	<p>An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives.</p> <p>- Major compliance -</p>	<p>A training program is available in the Mill Training Plan 2023 updated on yearly basis and revised as per the management requirement. Included in this plan is the internal and external program. Subjects among others identified related to environment are:</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">(Mill) subject</th> <th colspan="3">schedule</th> </tr> <tr> <th>1-4</th> <th>5-9</th> <th>9-12</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Requirement MSPO RSPO</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>2</td> <td>ESH policy objective, target & program</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>3</td> <td>ESH role & function</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>4</td> <td>Legal & other requirements</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>5</td> <td>HIRARC & EAI</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>6</td> <td>Scheduled waste management</td> <td></td> <td></td> <td>/</td> </tr> <tr> <td>6</td> <td>Noise training</td> <td></td> <td></td> <td>/</td> </tr> </tbody> </table>		(Mill) subject	schedule			1-4	5-9	9-12	1	Requirement MSPO RSPO	/			2	ESH policy objective, target & program	/			3	ESH role & function	/			4	Legal & other requirements		/		5	HIRARC & EAI		/		6	Scheduled waste management			/	6	Noise training			/	Complied
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4.5.1.6	<p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>Discussions on environmental issues were discussed at the following forums:</p> <ul style="list-style-type: none"> a) Stakeholder meetings b) ESH meeting on environmental issue if arises. c) Monthly management meeting should there be issues raised. d) Daily briefing during muster <p>The respective stakeholder meetings for all the estates were held at the respective estates. Mainly the discussion focused on the scheduled waste and domestic waste handling. Minutes of meeting was sighted and verified. Sample on environmental meeting dated 10/02/2023. Based on the samples taken, the meeting related to the process were found to be discuss their concerns about environmental quality.</p>	Complied																																											
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Criterion / Indicator		Assessment Findings	Compliance																				
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 -	Monthly and annual records on energy consumption for non-renewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Sighted tabulation of data maintained by the mill. <table border="1" data-bbox="1048 608 1870 710"> <thead> <tr> <th rowspan="2">Mill</th> <th colspan="6">Diesel L / FFB mt</th> </tr> <tr> <th>Baseline</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>GSOM</td> <td>1.40</td> <td>0.80</td> <td>0.63</td> <td>0.79</td> <td>0.58</td> <td>0.43</td> </tr> </tbody> </table>	Mill	Diesel L / FFB mt						Baseline	2019	2020	2021	2022	2023	GSOM	1.40	0.80	0.63	0.79	0.58	0.43	Complied
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4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel used by contractors, including all transport and machinery operations are available in the mill annual budget. This was sighted in the 2022 annual estimate.	Complied																				
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	The fibre and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fibre are delivered to estates for multi-purpose or sold to outside buyers. EFB is used in the estates for mulching. The quantum of fibre and shell produced from the mill processing is calculated based on the mass ratio i.e., shell and fibre approx. at 6% and 13 % of the FFB respectively.	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 and pollution are identified and documented in the Waste Management. The compilation for 2023 was guided by the Sustainability Department applicable to both estates and mills. Details of waste generated and the source arising from the mill operations/activities among others are shown below:	Complied																				

Criterion / Indicator		Assessment Findings			Compliance																										
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4.5.3.2	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p>- Major compliance -</p>	<p>The disposal/recycling of waste generated by the estates are made as follows:</p> <table border="1"> <thead> <tr> <th>Type of waste</th> <th>Location</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>Domestic waste rubbish</td> <td>Line sites, office, workshop, store,</td> <td>Collection/disposal 2x/week to the estate designated landfill.</td> </tr> </tbody> </table>	Type of waste	Location	Action to be taken	Domestic waste rubbish	Line sites, office, workshop, store,	Collection/disposal 2x/week to the estate designated landfill.		Complied																					
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Criterion / Indicator		Assessment Findings			Compliance
		Scrap metal	Workshop	Inventory maintained, tender at regional level for sale to licensed contractors	
		SW 404 Clinical waste	Clinic	Inventory maintained. Storage in sharp bin in clinic. Disposal to Sedafiat Sdn Bhd	
		SW rags, plastics, filters,	Workshop	Inventory maintained. Storage in scheduled waste store. Disposal to Lagenda Bumimas Sdn Bhd	
		Spent lubricant & hydraulic oil	Workshop	Inventory maintained. Storage in scheduled waste store. Disposal to Lagenda Bumimas Sdn Bhd	
4.5.3.3	<p>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</p> <p>- Major compliance -</p>	<p>The procedures for handling used chemicals classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by Head Office personnel and implemented in all estates and mills for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows:</p> <ul style="list-style-type: none"> a) Management of class 2 (and higher) chemical containers. b) Management of fertilizer bags <p>These documents were established on 13/8/2009 (OSH Manual) and 01/8/2013 (Sustainability Manual) and remained effective for practice in all estates and mills. The verification sampling as per below:</p> <p>20230526095VS1C4 – dated 26/05/2023 to Lagenda Bumimas Sdn Bhd – SW 323 – with total 0.2196mt</p>			Complied

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Criterion / Indicator		Assessment Findings	Compliance																		
		20230526096PXVI2 – dated 26/05/2023 to Lagenda Bumimas Sdn Bhd – SW410 – with total 0.056mt 2023052609N5VJD2 – dated 26/05/2023 to Lagenda Bumimas Sdn Bhd – SW 409 – with total 0.033 mt																			
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	Both the estates/mill disposed their domestic waste to the designated landfill located in the host estate. All domestic waste is collected 2x/week by the estate management.	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 -	<p>This is available in the Mill Pollution Prevention Plan 2023. Among others the mill has identified activities producing pollution in the following in the 2023 plan.</p> <table border="1"> <thead> <tr> <th></th> <th>Pollution Source</th> <th>Specific Concern</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>FFB Receiving</td> <td>Air Pollution Noise Pollution</td> </tr> <tr> <td>2</td> <td>Vehicle parking area</td> <td>Water & soil pollution due to leakages from vehicles Generation of scheduled waste</td> </tr> <tr> <td>3</td> <td>FFB sterilisation</td> <td>Water pollution Generation of scheduled waste</td> </tr> <tr> <td>4</td> <td>CPO Clarification</td> <td>Water pollution Risk of contaminated CPO with oil</td> </tr> <tr> <td>5</td> <td>Nut cracking & CPK Production</td> <td>Air Pollution Water pollution</td> </tr> </tbody> </table> <p>Mainly the mill identified source of pollution from their processing activities at the identified stations.</p>		Pollution Source	Specific Concern	1	FFB Receiving	Air Pollution Noise Pollution	2	Vehicle parking area	Water & soil pollution due to leakages from vehicles Generation of scheduled waste	3	FFB sterilisation	Water pollution Generation of scheduled waste	4	CPO Clarification	Water pollution Risk of contaminated CPO with oil	5	Nut cracking & CPK Production	Air Pollution Water pollution	Complied
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Criterion / Indicator		Assessment Findings		Compliance	
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The action plan/mitigation measures taken to reduce the identified pollutants are described in the following;		Complied	
			Pollution Source		Action Plan/Mitigation Measures
		1	FFB Receiving		Regular servicing maintenance of vehicles/machinery Engine OFF while awaiting entrance to the ramp Ensure major traffic areas are away from residential complex, signage on speed limit,
		2	Vehicle parking area		Tray provided for the drivers to be used underneath their vehicle during stationary. Used gloves & contaminated fibre to treat as scheduled waste.
		3	FFB sterilisation		Install & maintain oil trap at monsoon drains if steriliser condensate is leaking. Discharge steriliser condensate into sludge pit for recovery purposes Used glove & contaminated fibre to treat as scheduled waste.
4	CPO Clarification	Install & maintain high level siren at sludge tank, hot water tank & CPO tank Channel all spillages to sludge pit for recovery purposes. Recover oil from sludge pit to oil room for reprocessed. Regular service & maintenance of machinery Containment via bunds for machinery/gearbox			

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Criterion / Indicator		Assessment Findings				Compliance																								
		5	Nut cracking & CPK Production	Install cover plate at particular machine e.g. cracker mixture.	Reduce the frequency of floor washing																									
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>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No overflow was observed, and flow meter reading was recorded daily. GSPOM records the effluent monitoring for DOE submission OER for license 001878 JAS.SSK.600-3/1/3 for 2nd Quarter (01/04/2022 – 31/06/2023). Result as per below:</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>02/04/2023</th> <th>02/05/2023</th> <th>01/06/2023</th> </tr> </thead> <tbody> <tr> <td>pH value</td> <td>8.30</td> <td>8.10</td> <td>8.00</td> </tr> <tr> <td>BOD</td> <td>418</td> <td>293</td> <td>245</td> </tr> <tr> <td>COD</td> <td>1400</td> <td>1600</td> <td>2300</td> </tr> <tr> <td>Total Solid</td> <td>4940</td> <td>5395</td> <td>6285</td> </tr> <tr> <td>Oil and Grease</td> <td>9.80</td> <td>3.60</td> <td>12.40</td> </tr> </tbody> </table>				Parameter	02/04/2023	02/05/2023	01/06/2023	pH value	8.30	8.10	8.00	BOD	418	293	245	COD	1400	1600	2300	Total Solid	4940	5395	6285	Oil and Grease	9.80	3.60	12.40	Complied
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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. 	<p>The Water Management Plan 2023 for the mill has been established with latest review on Jan 2023. The plan emphasized on the following areas.</p> <ul style="list-style-type: none"> a) Water source/Efficient use of water b) Renew-ability of water source c) Avoidance of surface and ground water contamination <p>Details of the action plan and monitoring among others are tabled as follows:</p>				Complied																								

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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.). - Major compliance -			Areas of concerns		Action Plan		
		1	Water source	Water from catchment pond	Supply to residential areas /complex for all divisions		Use for mill processing and washing.
				Rain Harvest	Use for general compound and washing.		
		2	Efficient use of water	Residential areas	Monitoring of pipes leakages		
				Optimize usage & reduce wastage	Recycle coolant water from engine room back to water system.		Reduce floor washing by sweeping.
				Education/training	Promote water conservation/awareness among employees		
		3	Renewability water source	Rainwater capture at catchment	Monitoring of pond level and daily rainfall.		
				Rain water harvest	Collection through gutter and usage for floor cleaning.		
		4	Avoidance of surface/ground water contamination	Contamination of surface and ground water through run-off soil,	Inspection of bund/secondary compartment for CPO, chemical storage area including SW store & machinery.		Proper arrangement of EFB to estate.

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Criterion / Indicator		Assessment Findings		Compliance	
				nutrients or chemicals, disposal of POME	Land irrigation application for POME discharge Educate ERPT during event of spillages.
				Outgoing water into main natural waterways be monitored activities with possible negative impact.	To monitor water quality
					To monitor BOD of POME
					To maintain good condition of sewage system.
					To ensure landfill >50 m from river/water source to prevent contamination.
					Maintenance of flatbed/furrow for proper flow.
				Drainage system	Free flow drains & scheduled maintenance
Water pollution control	To monitor the water quality for drinking water upstream/downstream water, boundary water, mill discharge water.				
5	Others	To ensure plantations activities do not cause	To monitor water quality through analysis of hulu/hilir, boundary & outlet.		

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Criterion / Indicator		Assessment Findings				Compliance																												
				adverse impacts to water source of local communities, employees & families.	Monitoring of chemical consumption used for water treatment plant. rainfall, Monitoring of chemical consumption used for water treatment plant. rainfall																													
		Monitoring of Labuk river was available in Mill as per below:- Lab ref No: E230624/02A-02C Dated: 03/07/2023																																
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Parameter</th> <th style="width: 25%;">Upstream River</th> <th style="width: 25%;">Down Stream River</th> <th style="width: 25%;">Final discharge</th> </tr> </thead> <tbody> <tr> <td>pH value</td> <td>7.4</td> <td>7.3</td> <td>8.0</td> </tr> <tr> <td>BOD</td> <td>3.6</td> <td>3.8</td> <td>245</td> </tr> <tr> <td>COD</td> <td>22</td> <td>21</td> <td>2,300</td> </tr> <tr> <td>AN</td> <td>ND</td> <td>ND</td> <td>169.1</td> </tr> <tr> <td>TN</td> <td>ND</td> <td>ND</td> <td>189.5</td> </tr> <tr> <td>Oil & Grease</td> <td>ND</td> <td>ND</td> <td>12.4</td> </tr> </tbody> </table>				Parameter	Upstream River	Down Stream River	Final discharge	pH value	7.4	7.3	8.0	BOD	3.6	3.8	245	COD	22	21	2,300	AN	ND	ND	169.1	TN	ND	ND	189.5	Oil & Grease	ND	ND	12.4	
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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 -	The mill adopts a land application system on furrows. Area of application as stipulated in the DOE <i>Jadual Pematuhan</i> .				Complied																												
4.6 Principle 6: Best Practices																																		

Criterion / Indicator		Assessment Findings	Compliance										
Criterion 4.6.1: Mill Management													
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	<p>The SOP for the estates and mill operations are available which is prepared on Group basis. There are levels/types of the documentation identified as follows:</p> <ul style="list-style-type: none"> a. Quality, Environmental, Safety & Health & Sustainability Manual – 01/7/17 b. System Procedure – 01/1/2012 c. Procedure Manual – 02/1/2018 d. SOM Standard Operating Manual – 2013 e. Safe Operating Procedure – 01/1/2011 f. Environmental Control Procedure – 01/9/2018 g. Store Operating Manual – 2014 h. Jobs description - 2012 <p>The mill operations are supervised by the staff, Engineers of the Mill. The record of monitoring as per below:-</p> <p>Engineering Control Examination Report for LEV. Report Ref: HQ/20/JHII/00/00033-2022/031. This report assess by Hygiene technician II from DYNAKEY Laboratories Sdn Bhd dated 19/09/2022. Result as per below:-</p> <table border="1"> <thead> <tr> <th>Fume Hood I</th> <th>Face Velocity</th> <th>Recommended value</th> <th>Face flow rate</th> <th>Recommended value</th> </tr> </thead> <tbody> <tr> <td></td> <td>87</td> <td>80-125</td> <td>450</td> <td>411.89 -643.58</td> </tr> </tbody> </table>	Fume Hood I	Face Velocity	Recommended value	Face flow rate	Recommended value		87	80-125	450	411.89 -643.58	Complied
Fume Hood I	Face Velocity	Recommended value	Face flow rate	Recommended value									
	87	80-125	450	411.89 -643.58									

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Criterion / Indicator		Assessment Findings	Compliance
		Monthly inspection for LEV was conducted monthly basis. The latest record was on 01/07/2023, previously was conducted on 02/06/2023 and 02/05/2023.	
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	The monitoring of the mill process is made through the shift supervision headed by an Engineer/Executives. All process parameters are documented and summarized in a daily report. The external monitoring is made through visits i.e. SVP and the mill management team. The implementation verification as per indicator 4.6.1.1.	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 -	<p>The business plan for the mill is presented in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, PK and, operational & maintenance cost and CAPEX.</p> <p>The business or management plan for the estates were presented in the form of annual budget with 5 years projection. The annual budget contains the crop projection and the finance allocation for field operation & administrations and CAPEX.</p> <p>The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p> <p>Verification the budget was available as per below:-</p> <p>New blocks 14/16 for workers quarters CF 2021 – RM 56,250.00</p> <p>New housing for staff quarters – RM 75,000.00</p> <p>One Unit 300kW Diesel Generator Set – RM 250,000.00</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 to name a few.	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 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			
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	The contractors engaged by the mill management have 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.	Complied

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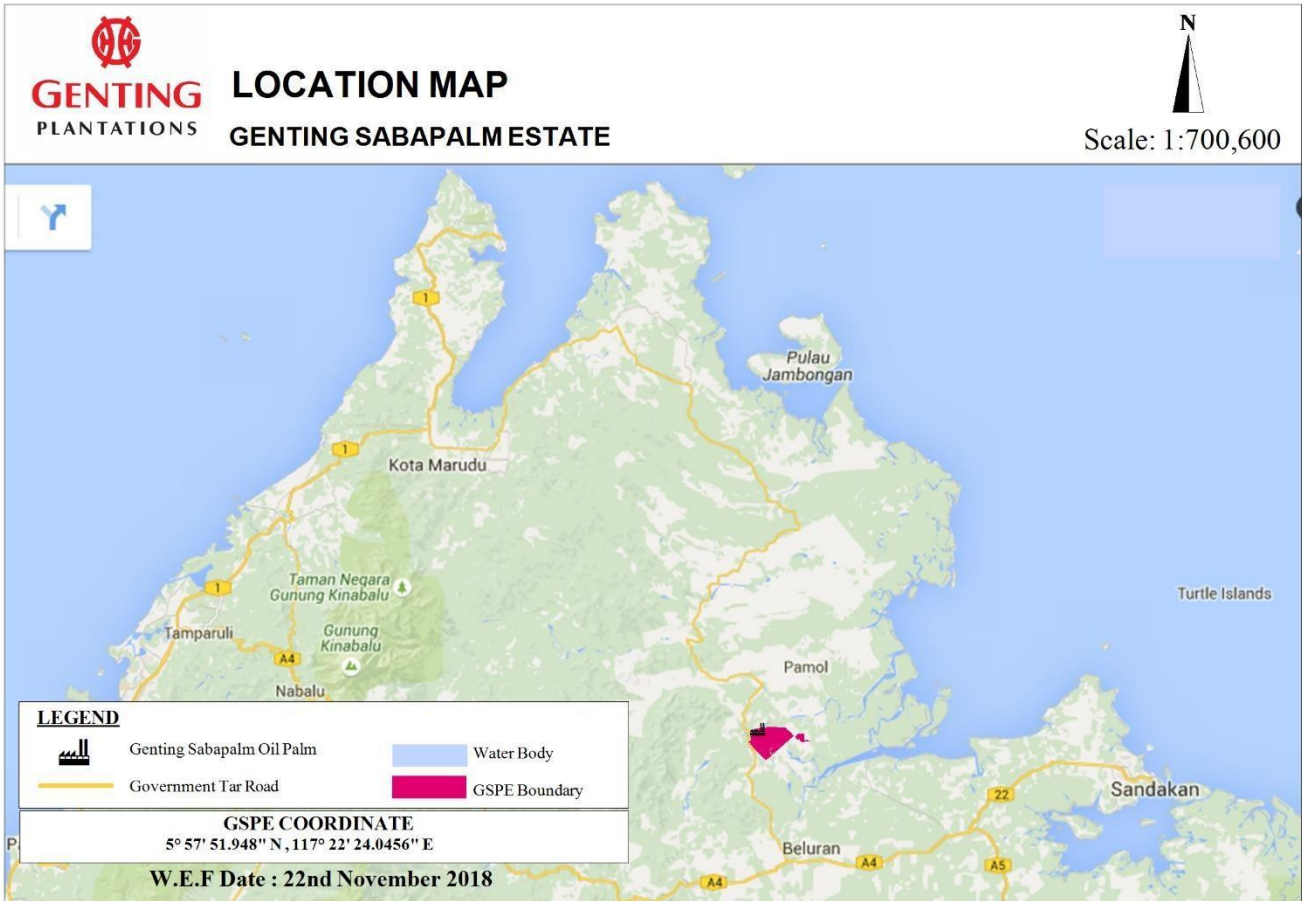
Criterion / Indicator		Assessment Findings	Compliance
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Signed contract agreements between the company and the contractors were available for verification. All the agreements were still valid at the point of this 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 -	The company 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

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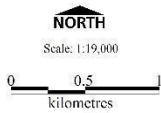
Appendix B: Smallholder Member Details

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

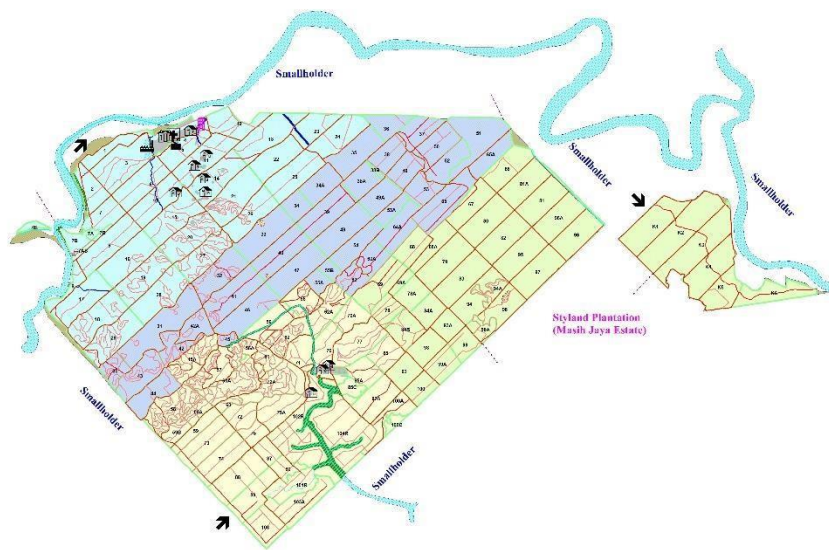
Appendix C: Location and Field Map



Genting Sabapalm Oil Mill and Genting Sabapalm Estate



GPS MAP OF GENTING SABAPALM ESTATE



LEGEND

- Boundary Stone
- Office
- Nursery
- Store
- Limestone
- Clinic
- Mill
- School/Humanus
- Mesquite
- Inlet of Major River
- Outlet of Major River
- Exit and Entrance
- Block Boundary
- Main Road
- Submain Road
- Stakeholder Boundary
- Water Body
- Riparian
- Stream
- Main Drain
- Building/Infrastructure
- Cattle Area
- Quarry
- Division Sapi
- Division Kwat
- Division Klgan
- Division Bangkawat
- Undeveloped Area



GSPL Coordinates : 5.965087 N, 117.374117 E.
 Projection : Longitude/Latitude
 Datum : WGS 84
 Data Source : FGM Survey Using Garmin
 Prepared by :
 Genting Plantations Research Centre Sabah(GPRCS)
 Date Updated : 15 July 2015

GENTING PLANTATIONS BERHAD

GENTING SABAPALM ESTATE
 P. O. BOX NO. 901,
 90701 SANDAKAN,
 SABAH.

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
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
SDS	Safety Data Sheet
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure