

**RSPO PRINCIPLE AND CRITERIA –  
2<sup>nd</sup> Annual Surveillance Assessment (ASA2)  
Public Summary Report**

<b>Genting Plantations Berhad</b>
Client company Address: 10 <sup>th</sup> Floor, Wisma Genting Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
Certification Unit: <b>Genting SDC Sdn Bhd</b> <b>Genting Tanjung Oil Mill</b> Mile 97, Sandakan-Lahad Datu Road Tenegang, Jalan Jeroco 90200 Kinabatangan Sabah, Malaysia

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**Section 1: Scope of the Certification Assessment**

1. Company Details			
<b>RSPO Membership Number</b>	1-0086-06-000-00	<b>Membership Approval Date</b>	14/11/2006
<b>Parent Company Name</b>	Genting Plantations Berhad		
<b>Address</b>	10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia		
<b>Subsidiary (Certification Unit Name)</b>	Genting Tanjung Oil Mill		
<b>Address</b>	Mile 97, Sandakan-Lahad Datu Road, Tenegang, Jalan Jeroco 90200 Kinabatangan, Sabah, Malaysia		
<b>Contact Name</b>	Mr Tan Cheng Huat (Senior Vice President – Plantation Division)		
<b>Website</b>	<a href="http://www.gentingplantations.com">http://www.gentingplantations.com</a>	<b>E-mail</b>	<a href="mailto:Chenghuat.tan@genting.com">Chenghuat.tan@genting.com</a>
<b>Telephone</b>	+603 2333 6510 (Head office) +089 567 091 (Genting Tanjung Oil Mill)	<b>Facsimile</b>	+603 2333 6575

2. Certification Information			
<b>Certificate Number</b>	RSPO 652320	<b>Date of First Certification</b>	11/01/2017
		<b>Certificate Start Date</b>	11/01/2017
		<b>Certificate Expiry Date</b>	10/01/2022
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production from Genting Tanjung Oil Mill and supply base (Genting Tanjung, Genting Tenegang, Genting Landworthy, Genting Layang & genting Bahagia Estate)		
<b>Applicable Standards</b>	RSPO P&C MY-NI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E Mass Balance)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
GTOM, GTJE, GLWE, GLYE, GBGE & GTGE: EU-ISCC-Cert-DE119-60153796 ISCC-Plus-Cert-60153796	ISCC EU & ISCC PLUS	ASG Cert GmbH	12/01/2018
GTOM: ISO 9001:2008 ISO 14001:2004	QMS EMS OHSAS	SIRIM QAS International Sdn Bhd	14/09/2018 14/09/2018 24/02/2018

OHSAS 18001:2007 MS1722	OHSMS		24/02/2018
MSPO 680512	MS 1500:MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	08/08/2023
MSPO 692777	MS 1500:MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3		

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Genting Tanjung Oil Mill	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road 90200 Kinabatangan, Sabah, Malaysia	5° 25' 22.8" N	118° 16' 23.9" E
Genting Tanjung Estate (GTJE)	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road 90200 Kinabatangan, Sabah, Malaysia	5° 26' 33.41" N	118° 10' 10.23" E
Genting Tenegang Estate (GTGE)	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road 90200 Kinabatangan, Sabah, Malaysia	5° 20' 46.02" N	118° 13' 32.2" E
Genting Landworthy Estate (GLWE)	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road 90200 Kinabatangan, Sabah, Malaysia	5° 25' 13.4" N	118° 18' 24.6" E
Genting Layang Estate (GLYE)	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road 90200 Kinabatangan, Sabah, Malaysia	5° 25' 21.90" N	118° 14' 3.35" E
Genting Bahagia Estate (GBGE)	Jalan Jeroco, Mile 97, Sandakan-Lahad Datu Road 90200 Kinabatangan, Sabah, Malaysia	5° 21' 49.5" N	118° 16' 33.7" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Tanjung Estate (GTJE)	3,798.16	156.90	511.01	4,466.07	85.04
Genting Tenegang Estate (GTGE)	3,430.25	85.6	136.69	3,652.54	93.91
Genting Landworthy Estate (GLWE)	3,706.61	89.70	241.49	4,037.80	91.80
Genting Layang Estate (GLYE)	1,818.87	172.05	86.49	2,077.41	87.55

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Genting Bahagia Estate (GBGE)	3,788.3	92.10	546.64	4,427.04	85.57
<b>Total</b>	<b>16,542.19</b>	<b>596.35</b>	<b>1,522.32</b>	<b>18,660.86</b>	<b>88.64</b>

<b>6. Plantings &amp; Cycle</b>							
<b>Estate</b>	<b>Age (Years)</b>					<b>Mature**</b>	<b>Immature</b>
	<b>0 - 3</b>	<b>4 - 10</b>	<b>11 - 20</b>	<b>21 - 25</b>	<b>26 - 30</b>		
Genting Tanjung Estate (GTJE)	1,049.06	272.90	198.28	0	2,277.92	2,749.10	1,049.06
Genting Tenegang Estate (GTGE)	770.36	0	605.42	0	2,054.47	2,659.89	770.36
Genting Landworthy Estate (GLWE)	0	0	0	3,706.61	0	3,706.61	0
Genting Layang Estate (GLYE)	0	267.08	1,367.93	183.86	0	1,818.87	0
Genting Bahagia Estate (GBGE)	669.38	0	0	0	3,118.92	3,118.92	669.38
<b>Total (ha)</b>	<b>2,488.8</b>	<b>539.98</b>	<b>2,171.63</b>	<b>3,890.47</b>	<b>7,451.31</b>	<b>14,053.39</b>	<b>2,488.8</b>

<b>7. Certified Tonnage of FFB (Own Certified Scope)</b>			
<b>Estate</b>	<b>Tonnage / year</b>		
	<b>Estimated (Jan 2018-Dec 2018)</b>	<b>Actual (Nov 2017- Oct 2018)</b>	<b>Forecast (Jan 2019-Dec 2019)</b>
Genting Tanjung Estate (GTJE)	69,656.00	62,724.58	69,024.00
Genting Tenegang Estate (GTGE)	61,040	58,291.55	59,088.00
Genting Landworthy Estate (GLWE)	75,513.93	69,148.96	82,515.00
Genting Layang Estate (GLYE)	36,505	31,380.13	35,236.00
Genting Bahagia Estate (GBGE)	63,722.77	69,019.87	68,767.00
<b>Total</b>	<b>306,437.7</b>	<b>290,565.09</b>	<b>314,630</b>

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8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (Jan 2018-Dec 2018)	Actual (Nov 2017- Oct 2018)	Forecast (Jan 2019-Dec 2019)
	N/A		N/A
<b>Total</b>			

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (Jan 2018-Dec 2018)	Actual (Nov 2017- Oct 2018)	Forecast (Jan 2019-Dec 2019)
Independent smallholders	41,473.34	58,445.54	62,000
Independent outgrowers	0	0	0
<b>Total</b>	41,473.34	58,445.54	62,000

10. Certified Tonnage			
	Estimated (Jan 2018-Dec 2018)	Actual (Nov 2017- Oct 2018)	Forecast (Jan 2019-Dec 2019)
	FFB	FFB	FFB
Mill Capacity: 60 MT/hr	306,437.70	290,625.09	314,630
SCC Model: MB	CPO (OER: 20.87 %)	CPO (OER: 20.79%)	CPO (OER: 21.06 %)
	63,938.46	60,413.27	66,261.08
	PK (KER: 5.20 %)	PK (KER: 5.45 %)	PK (KER: 5.37 %)
	18,825.58	15,832.81	16,895.63

\*Volume extension, sub license ID: CB 66203 [CPO: 0.1 mt, PK:2,900 mt] valid until 10/4/19

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	5,570.71	52,521.96	0	2,031.00	60,123.67

<b>12. Actual Sold Volume (PK)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>PK (MT)</b>	13,880.71	0	0	1,200	15,080.71

<b>13. Actual Group certification Claims</b>		
	Credit	Physical Volume (MT)
<b>IS-CSP0</b>	Nil	Nil
<b>IS-CSPK0</b>	Nil	Nil
<b>IS-CSPKE</b>	Nil	Nil



## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn Bhd,  
(ASI Accreditation Number: ASI-ACC-067)  
Unit 3, Level 10, Tower A  
The Vertical Business Suites, Bangsar South  
No. 8, Jalan Kerinchi  
59200 Kuala Lumpur  
Tel +603 2242 4211 Fax +603 2242 4218  
Nicholas Cheong: [Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com)  
[www.bsigroup.com](http://www.bsigroup.com)

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site annual surveillance assessment was conducted from 13-16/11/2018. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out on-site assessment was conducted on 15/02/2019. The audit programmes are included in Section 2.3.

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. RSPO Principles & Criterias 2013 (MY-NI 2014) and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (0.8\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula  $(0.8\sqrt{y}) \times (z)$ ; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each

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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 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

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

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

<b>Assessment Program</b>						
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Initial Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>	
Genting Tanjung Oil Mill	√	√	√	√	√	
Genting Tanjung Estate	√	-	√	-	√	
Genting Tenegang Estate	√	-	-	√	-	
Genting Landworthy Estate	-	-	√	-	-	
Genting Layang Estate	-	√	-	√	-	
Genting Bahagia Estate	-	√	-	-	√	

**Tentative Date of Next Visit:** October 21, 2019 – October 24, 2019

**Total No. of Mandays:** 10 mandays including 1.0 day SC for mill.

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**2. 2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Mohamed Hidhir Zainal Abidin	Team Leader	He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of supply chain, legal, mill best practices, safety and health, environmental and workers and stakeholders consultation
Hu Ning Shing	Team Member	She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages
Ragu Samy Erulappan	Team Member	Ragu Erulappan is a fulltime employee with BSI Services Malaysia. He graduated from University Technology Malaysia. He attended internal RSPO training in 22 December 2014. He has completed ISO 9001:2008 Quality Management System Lead Auditor training, ISO 14001, ISO 18001 Lead Auditor Training. Currently he is an ISO 9001:2008, ISO 14001, ISO 18001, C-TPAT (Supply Chain Security) and GDPMD (Good Distribution Practice for Medical Devices) Lead Auditor. He has more than 5 years of auditing experience since August 2010 covering Environment, Safety and Health, Legal aspects in various industries. He is involved as Environment, Safety and Health Auditor during the RSPO Assessment. For this assessment he assesses Mill and Estate OSH, Legal, and Environment aspects. He is able to speak and understand Bahasa Malaysia, English and Tamil.

**Accompanying Persons:**

<b>No.</b>	<b>Name</b>	<b>Role</b>
	Nil	

**2.3 Assessment Plan**

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

PRELIMINARY AGENDA					
Date	Time	Subjects	Hidhir	Ning Shing	Ragu
Monday 12/11/2018	PM	Audit Team travelling to Sandakan via AK5195 ETA 1630. Check-in at Pavilion Hotel.	√	√	√
Tuesday 13/11/2018  <b>Genting Tanjung Palm Oil Mill</b>	630 am	Audit team travelling to Genting Tenegang Complex.	√	√	√
	09.00 – 09.30	Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).</li> <li>• Verification on previous audit findings</li> </ul>			
	09.00 – 12.00	<b>Genting Tanjung Palm Oil Mill</b> Inspection: 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 etc.	√	√	√
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 16.30	<b>Genting Tanjung Palm Oil Mill:</b> Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√
	16.30-17.00	Interim Closing briefing.	√	√	√
Wednesday 14/11/2018  <b>Genting Tanjung Estate</b>	08.30 – 12.00	<b>Genting Tanjung Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
	10.00 – 12.00	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 16.30	<b>Genting Tanjung Estate</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16.30-17.00	Interim Closing Briefing	√	√	√

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PRELIMINARY AGENDA					
Date	Time	Subjects	Hidhir	Ning Shing	Ragu
Thursday 15/11/2018  <b>Genting Landworthy Estate</b>	8.30 – 13.00	<b>Genting Landworthy Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 16.30	<b>Genting Landworthy Estate</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16.30-17.00	Interim Closing Briefing	√	√	√
Friday 16/11/18  <b>Genting Tanjung Palm Oil Mill</b>	8.30 – 12.00	<b>Genting Tanjung Palm Oil Mill – RSPO SCC audit</b> General COC and module E. <ul style="list-style-type: none"> <li>- Documented procedure</li> <li>- Management review and internal audit</li> <li>- Purchasing goods in</li> <li>- Sales goods out</li> <li>- Register of transaction</li> <li>- Claims</li> </ul>	√	√	-
	12.00 – 12.30	Presentation of finding and closing meeting	√	√	√
	PM	Lunch and travel back to Sandakan. Audit team travel back to KL via AK5197 ETD 2100	√	√	√

### Section 3: Assessment Findings

#### 3.1 Normative requirement applied for this assessment:

- Genting Plantation Sdn Bhd / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

#### 3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
<b>Summary of the Time Bound Plan</b>		
Does the plan include all subsidiaries, estates and mills?	Yes	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	No. On 12 October 2017, RSPO issued a clarification on Criterion 2.1 ( <a href="http://mailchi.mp/rsपो/rsपोstatement-on-hak-guna-usaha-hgu-indonesia-805113?e=17587afb24">http://mailchi.mp/rsपो/rsपोstatement-on-hak-guna-usaha-hgu-indonesia-805113?e=17587afb24</a> ), which requires plantations and mills to comply with all applicable local, national and ratified international laws and regulations Pursuant to this, which was effective as of 12 October 2017, RSPO members must have a legitimate right to cultivate ( <i>Hak Guna Usaha</i> or a <b>HGU</b> ) and IUP in order to secure the RSPO certificates.  As of March 2019, only 3 PTs in Indonesia have obtained the HGU. The rest are in process of applying for the HGU. Due to the unpredictable timeline for the HGU process, the company will revise this TBP according to the issuance of the HGU.	Yes
Is the time bound plan challenging? <ul style="list-style-type: none"> <li>• Age of plantations.</li> <li>• Location.</li> <li>• POM development</li> <li>• Infrastructure.</li> <li>• Compliance with applicable law.</li> </ul>	The newest acquisition was done in 2017 ( PT KIU) and the target to certify PT KIU is 2019 ( ref TBP)	Yes
Have there been any changes since the last audit? Are they justified?	No changes in the Group commitment towards 100% certification of the operating units including plasma. Only updates are made.	Yes

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If there have been changes, what circumstances have occurred?	None.	N/A
Have there been any stakeholder comments?	None.	Yes
Have there been any newly acquired subsidiaries?	None.	Yes
If yes, have the newly acquisitions certified within a three-year timeframe?	N/A	N/A
Have there been any isolated lapses in implementation of the plan?	No isolated lapses observed.	Yes
<b>Un-Certified Units or Holdings</b>		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	<u>Sabah</u> 1. Genting Kencana Estate – LUCA passed, Concept Note under revision and to be re-submitted to the Panel in 1Q 2019. 2. Genting Jambongan Estate – Concept Note and Remediation Plan has been submitted to RSPO. RSPO allowed for Genting Jambongan to proceed with its certification programme.  <u>Indonesia</u> 1. PT SISM – LUCA passed. Concept Note and Remediation Plan submitted and approved by Panel. Action plan to be checked by auditor during the next audit. 2. PT GAL – LUCA under review by RSPO.	Yes
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	NPP for PT PALJ, PT AAC, PT UAI, PT SMA, PT KIU is in progress.	Yes
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.	<a href="http://www.rspo.org/members/complaints/status-of-complaints/view/38">http://www.rspo.org/members/complaints/status-of-complaints/view/38</a> (Complaints officially closed on 31 October 2016)	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labor dispute cases reported	Yes
Any Legal non-compliance is	Comply	Yes

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being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1		
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Yes. Internal audit carried out the sustainability team from each region.	Yes

**3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)**

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?	Not applicable	

**3.4 Details of findings**

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

During the Certification Assessment there were two (2) Major & four (4) Minor nonconformities raised. The Genting Tanjung Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for its effectiveness and closed accordingly.

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1707465-201808-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.2.1 Major
<b>Date Issued</b>	16/11/2018	<b>Due Date</b>	
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	15/02/2018
<b>Statement of Nonconformity:</b>	Consultation and communication procedure was not implemented effectively.		
<b>Requirement Reference:</b>	Consultation and communication procedures shall be documented.		
<b>Objective Evidence:</b>	Interviewed with the female workers who worked on night shift in GTOM and seen the meeting minutes for Gender Committee dated 14/8/2018 found that the workers were asking about the night shift allowance and the Chairman of the committee informed that allowance has agreed as per the memo dated 24/11/2017 issued by top management. Interviewed with the management confirmed that they		



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	had only paid 3 months of allowance to the female workers on December 2017, January 2018 and February 2018 and stopped paying the allowance on March 2018 due to they obtained approval from JTK Sabah for exclusion to comply with the terms stated in the permit obtain earlier. However, the workers are not aware that night shift allowance has been stopped for female workers and no evidence to show that management has communicated the issue to the workers.
<b>Corrections:</b>	The latest update on the night shift allowance will be communicated directly to all female workers and, documented.
<b>Root Cause Analysis:</b>	Way of communication to workers is not effective as the communication was done during morning master call and not documented.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) All communication involving workers and other stakeholders to be conducted as per procedure, documented, filed and to include notice of meeting, minutes, photo etc.</li> <li>ii) Refresher training to the management and section head regarding the requirement of Consultation and Communication Procedure SMP-GPB-17.</li> </ul>
<b>Assessment Conclusion:</b>	The major NC was closed effectively with sufficient evidence of implementation on 15/2/19. Continuous implementation will be further verified in the next assessment.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1707465-201808-M2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.7.1 Major
<b>Date Issued</b>	16/11/2018	<b>Due Date</b>	
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	15/02/2019
<b>Statement of Nonconformity:</b>	The implementation of social and people policy was not effective.		
<b>Requirement Reference:</b>	There shall be documentary evidence that minimum age requirements are met.		
<b>Objective Evidence:</b>	Site visit to crèche and interviewed with a teenager aged 14 years old told that she is working in the field with her mother to collect loose fruit together with another friend who aged 12 years old. She was not feeling well during the visit and rested at crèche. Field visit to the Block 21 and interviewed with the mandore and mother of the teenager confirmed that there were two teenagers working in the field with them to collect loose fruits. During field visit also found that the teenager with age of 12 years old was working in the field.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>I) To ensure their parents register their children accordingly at Humana school &amp; Continuous Learning Centre (CLC). Note: Humana school for children 7 – 12 yrs old CLC (Continuous Learning Centre) – for children 13 – 18 yrs old</li> <li>II) To conduct an awareness training immediately to all workers and management team on the social and people policy, that child below 18 years old is not allowed in the field even with their parents' presence during working hours.</li> </ul>		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>i) Inadequate ground verification and monitoring.</li> <li>ii) Inadequate workers awareness on the minimum age policy.</li> </ul>		
<b>Corrective Actions:</b>	To issue Internal Memo on the following:		

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	<ul style="list-style-type: none"> <li>- Continuous monitoring by the Field Supervisor and Assistant In-Charge.</li> <li>- In the event any children found in the field, the matter shall be reported immediately to the Estate manager.</li> <li>- Periodic check estates' register against attendance at Humana, CLC &amp; Creche.</li> <li>- Teachers also to alert management on frequent absent children.</li> <li>- Encourage parents to send their children to school.</li> <li>- Parents to be held responsible.</li> <li>- To include the policies training or awareness programme into the estate annual training plan</li> <li>- To erect awareness signboard at prominent location to create and enhance workers knowledge regarding the company policy</li> </ul>
<b>Assessment Conclusion:</b>	<p>Major NC close out evidence:</p> <ul style="list-style-type: none"> <li>i) Verified memo by VP Plantation Sabah on the exploitation of children below 18 years old in the estate dated 23/11/18. Memo issued to the other relevant stakeholders and to all estates under Genting Tanjung Palm Oil Mill.</li> <li>ii) Briefing to all workers with regards to prohibition of child was done on 26/11/18 during morning muster. Interview with workers shows that most of them are able to explain on prohibition of young/child labor. Child below 18 years old is not allowed in the field. All children must be sent to CLC and Humana during working hours. iii) Verified administrative control (signage) on site and visible at prominent location within estate (point of entry and rest area) The major NC was closed effectively with sufficient evidence of implementation on 15/2/19. Continuous implementation will be further verified in the next assessment.</li> </ul>

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1707465-201808-N1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.7.3 Minor
<b>Date Issued</b>	16/11/2018	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	PPE compliance and its monitoring effectiveness was not fully adequate.		
<b>Requirement Reference:</b>	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.		
<b>Objective Evidence:</b>	During the Genting Landworthy Estate site visit on spraying activities at block 40, noticed that the PPE maintenance for the workers was not adequate. Found one respirator without filter and the other 2 units with worn out filters.		
<b>Corrections:</b>	To provide full complete PPE to the said group of workers.		
<b>Root Cause Analysis:</b>	Lack of supervision for usage of PPE before execute the spraying work.		

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<b>Corrective Actions:</b>	Estate will monitor and inspect during muster call. All monitoring will be recorded.
<b>Assessment Conclusion:</b>	Correction action is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1707465-201808-N2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.1.2 Minor
<b>Date Issued</b>	16/11/2018	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	The medicine inventory control and its ordering process mechanism found to be not fully effective.		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures shall be in place.		
<b>Objective Evidence:</b>	Visit to the Genting Landworthy Estate in house clinic found that the fever medicine syrups for children has no stock and currently adult paracetamol tablets are used as temporary replacement. Further verification indicate that the Internal Pre-Order Form dated 27/10/18 was yet to be processed for approval of medicine purchase		
<b>Corrections:</b>	HA to follow up immediately for approval to purchase the medicine.		
<b>Root Cause Analysis:</b>	HA (Hospital Assistant) fails to follow up to expedite the approval process.		
<b>Corrective Actions:</b>	SOP/workflow chart to ensure HA monitor and follow up on medicine stock checking and pre-order form. Any delay to be reported to the Estate Manager. Medicine order to be done in advance to avoid shortage.		
<b>Assessment Conclusion:</b>	Correction action is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.		

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1707465-201808-N3	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.1.3 Minor
<b>Date Issued</b>	16/11/2018	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Mechanism of ensuring compliance of legal requirement (Immigration Act 1959/63 – Act 155, Section 15 (1) and Labor Ordinance Sabah (Cap 67) Section 108 were ineffective.		
<b>Requirement Reference:</b>	A mechanism for ensuring compliance shall be implemented.		
<b>Objective Evidence:</b>	In Genting Tanjung Oil Mill, Genting Tanjung Estate and Genting Landworthy Estate has found that workers' permits had expired and under process of renewal. Sampled of the work permits that expired as below:		

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	<p>a. Permit No.: PD 9134067 valid until 20/8/2018 (GTJE)  b. Permit No.: PD 9136744 valid until 8/11/2018 (GTJE)  c. Permit No.: PD 9136739 valid until 8/11/2018 (GTJE)  d. Permit No.: PD 9136740 valid until 8/11/2018 (GTJE)  e. Permit No.: PD 8903693 valid until 25/7/2018 (GTJE)  f. Permit No.: PD 9117270 valid until 20/8/2018 (GTJE)  g. Permit No.: PD 9139441 valid until 30/10/2018 (GTOM)  h. Permit No.: PD 9134231 valid until 28/9/2018 (GTOM)  i. Permit No.: PD 8914820 valid until 20/8/2018 (GLWE)  j. Permit No.: PD 7851415 valid until 6/5/2018 (GLWE)  k. Permit No.: PD 9574534 valid until 30/10/2018 (GLWE)  l. Permit No.: PD 7629758 valid until 6/3/2018 (GLWE)  m. Permit No.: PD 9136429 valid until 30/8/2018 (GLWE)  n. Permit No.: PD 7851445 valid until 5/6/2018 (GLWE)</p> <p>Besides, document reviewed found that there were dependents who were born in Indonesia who possessed passport and Visit Pass (Social). However, sampled of the Visit Pass found that the following passes below were expired:</p> <p>a. Permit No.: PD 6135428 valid until 20/8/2017 (GLWE)  b. Permit No.: PD 8291832 valid until 5/6/2018 (GLWE)  c. Permit No.: PD 8902545 valid until 18/8/2018 (GLWE)  d. Permit No.: PD 7848969 valid until 4/6/2018 (GLWE)  e. Permit No.: PD 6135494 valid until 18/6/2017 (GLWE)  f. Permit No.: PD 8902008 valid until 6/7/2018 (GTJE)  g. Permit No.: PD 8902011 valid until 6/7/2018 (GTJE)  h. Permit No.: PD 7330339 valid until 3/2/2018 (GTJE)  i. Permit No.: PD 8902006 valid until 18/6/2018 (GTJE)  j. Permit No.: PD 9136467 valid until 19/7/2018 (GTJE)  k. Permit No.: PD 8291657 valid until 28/6/2018 (GTJE)</p> <p>In additional, verified the name list of dependents (without passport and visit pass) found that total 115 children from Indonesia. Total 24 children were born in Indonesia and 91 children were born in Malaysia were without valid passport and valid pass to stay in Malaysia.</p> <p>Genting Tanjung Estate Based on permit issued by Labour Department, ref: JTK.H.KBN.600-4/1/01261/0378 validity period 28/3/18 -27/3/19, 391 Indonesian and 5 Philippines workers approved for the permit. The latest workers master list as at October 2018 reported with additional of 50 new workers (total of 441). No evidence of additional quota approval obtained for the said workers as to date.</p>
<p><b>Corrections:</b></p>	<p>A. Work Permit &amp; Visit Pass: Follow up with HRAD on the status of the processing.</p> <p>B. Dependants/Children without valid passport &amp; valid pass  - Follow up with HRAD on the status  - Awaiting for direction from Sabah state government and relevant authorities.  - Follow up with MPOA.</p> <p>C. Manpower requirement:  Estate to submit for the additional 50 workers before expiring of the current permit.</p>
<p><b>Root Cause Analysis:</b></p>	<p>A. Work Permit &amp; Visit Pass:</p>

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1. All these group of workers and dependants list has been sent to HRAD (Human Resource & Administration Dept at Sandakan) on the following date:

Workers list memo sent to HRAD:

- 17th April 2018 (GTJE/AAM/18/121)
- 14th Aug' 2018 (GTJE/AAM/18/08/251)
- 21st March 2017 (GLWE/MEMO/2017/13)
- 27th Jan 2018 (GLWE/MEMO/2018/01)
- 03rd April 2018 (GLWE/MEMO/2018/05)
- 29th May 2018 (GLWE/MEMO/2018/17)
- 29th May 2018 (GLWE/MEMO/2018/18)
- 29th May 2018 (GLWE/MEMO/2018/19)
- 11th Oct 2018 (GLWE/MEMO/2018/43)
- 20th June 2018 (GTOM/WR/18/017)
- 17th July 2018 (GTOM/WR/18/025)

Dependants list memo sent to HRAD for GLWE (29 dependants) & GTJE (47 dependants):

- 17th April 2018 (GTJE/AAM/18/0120)
- 17th April 2018 (GTJE/AAM/18/0121)
- 08th May 2018 (GTJE/AAM/18/05/151)
- 13th June 2018 (GTJE/AAM/18/06/180)
- 28th June 2018 (GTJE/AAM/18/06/198)
- 14th Aug' 2018 (GTJE/AAM/18/08/251)
- 6th Nov 2017 (GLWE/MEMO/2017/47)
- 27th Jan 2018 (GLWE/MEMO/2018/01)
- 03rd April 2018 (GLWE/MEMO/2018/04,05,06)
- 05th May 2018 (GLWE/MEMO/2018/11)
- 29th May 2018 (GLWE/MEMO/2018/17,18)
- 19th July 2018 (GLWE/MEMO/2018/32)
- 22nd Sept 2018 (GLWE/MEMO/2018/39,40)

This was due to delay in processing work permit by the 'appointed agent'. The delay could be due to the impediment processing procedure during the transition of the new state government.

2. No follow up & monitoring.

B. Dependants/Children without valid passport & valid pass

GLWE (111 dependants) & GTJE (87 dependants) had submitted their dependants list to HRAD to process Passport and Visit Pass (new registration)

– Emailed to Pung Seu Kin (HRAD – GPOS, Sabah), GLWE 26th October 2018 and GTJE 09th October 2018. However, this process had stopped at HRAD level due to the following reasons:

a. Awaiting for legalization quota by Immigration Dept. Summary as follows:

	GLWE	GTJE
Total number of dependant	140	134
Dependant with passport & permit/visit pass	29	47

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	Dependant for new registration (Awaiting for legalization quota)	111	87
	<p>b. No direction from Sabah state government &amp; relevant authorities despite many letters sent by MPOA (Malaysian Palm Oil Association), EMPA (East Malaysian Planters Association), ISP-Sabah (The Incorporated Society of Planters).</p> <p>** Refer MPOA letter to Sabah state government in 2016, and follow up letters dated 27th Jun'18 and 4th Dec'18.</p> <p>C. Manpower requirement: The manpower requirement was not reviewed to suit estate's needs for field maintenance work due to the expedited replanting and expanding immature areas.</p>		
<b>Corrective Actions:</b>	<p>A. Work Permit &amp; Visit Pass: - Follow up closely with HRAD and relevant agencies. - To ensure the relevant correspondence are kept properly for future reference.</p> <p>B. Dependants/Children without valid passport &amp; valid pass - To ensure follow up done with HRAD and authorities for every application sent and the relevant correspondence are kept properly for future reference.</p> <p>C. Manpower requirement: To ensure manpower requirement reviewed annually and submitted to JTK for approval.</p>		
<b>Assessment Conclusion:</b>	Correction action is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.		

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1707465-201808-N4	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.8.3 Minor
<b>Date Issued</b>	16/11/2018	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	There was no recruitment procedure to demonstrate the hiring process.		
<b>Requirement Reference:</b>	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.		
<b>Objective Evidence:</b>	Sampled the mandore's checkroll book and interviewed with the mandore confirmed that 4 of the loose fruits collectors who do not possess passport and permit are working in the field and payment of wages was under the mandore's account (Employee No.: E00212). This occurred because the workers did not register in the company's system as they do not have legal documents.		
<b>Corrections:</b>	HRAD to finalize the procedure Recruitment of Foreign Workers: SMP-GPB-33 and to distribute to all operating units once approved by the top management.		

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<b>Root Cause Analysis:</b>	This is the group of worker appointed by mandore to carry out ad-hoc afternoon work.
<b>Corrective Actions:</b>	All recruitment process for new workers in the estate to be based on the Recruitment Procedure published by the HRAD. Training to management team on the new procedure.
<b>Assessment Conclusion:</b>	Correction action is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>OFI 1</b>	Nil

<b>Positive Findings</b>	
<b>PF #</b>	<b>Description</b>
<b>PF 1</b>	Good relationship with the neighbouring stakeholders
<b>PF 2</b>	Allocation of budget for continual improvement was evident and gazetted in the annual budget and focus towards legal compliance.

**3.4.1 Status of Nonconformities Previously Identified and Observations**

<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1559908-201709-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.5.1 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	19/01/2018
<b>Statement of Nonconformity:</b>	Documentations of pay shown unfulfilment of conditions.		
<b>Requirement Reference:</b>	Documentation of pay and conditions shall be available		
<b>Objective Evidence:</b>	<p>1) The mill management obtained Permit Wanita Bekerja Malam (Night Work for Woman Permit); JTK Sabah; Serial # 05(0016)SDK; Validity period: 28/7/2017 – 27/8/2018 as required under Section 75 Labour Ordinance (Sabah Chapter 67). The conditions, amongst all stated the following:</p> <ul style="list-style-type: none"> <li>• Woman workers shall be provided with free period of rest from work for continuous 11 hours before allowed to work again</li> <li>• Woman workers shall not involve in continuous night shift works exceeding 1 month period unless agreed</li> <li>• Woman workers shall be paid with shift allowance at a rate agreed within terms and conditions of work</li> <li>• Woman workers shall be provided with free transporting facilities to and from work place</li> <li>• And etc.</li> </ul> <p>However, based on the payslip of sampled shift woman workers employee # E00087 for the pay of Aug-Oct 2017, no any shift allowance were paid despite the</p>		



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	<p>punch card record for the same Aug-Oct 2017 months shown the woman worker worked on night shifts as following:</p> <ul style="list-style-type: none"> <li>• Aug 2017: 1st - 5th; 14th – 19th; 27th – 30th .</li> <li>• Sep 2017: 4th; 10th – 12th; 13th – 15th; 22nd – 30th</li> <li>• Oct 2017: 8th – 15th; 22nd – 24th; 26th – 28th Based on the evidence, the mill was not meeting the conditions of pay as per Permit Serial # 05(0016)SDK.</li> </ul> <p>2) Sampled of harvester, mandore and bunch checker payslip and cross checked with harvesting interval book, check roll book and bunch checker’s record found that the number of days of harvesters who worked on rest day were not properly documented. Further trail in the bunch checker records, the following workers bunch count recorded as per below:</p> <ul style="list-style-type: none"> <li>i) Employee No.: AS 369872, bunch count: 422 on 16/10/17, rest day on 15/10/17</li> <li>ii) Employee No.: AT 680829, bunch count: 450 on 23/10/17, rest day on 22/10/17</li> <li>iii) Employee No.: AT 245388, bunch count: 371 on 9/10/17, rest day on 8/9/17</li> <li>iv) Employee No.: A 6778643, bunch count: 299 on 9/10/17, rest day on 8/9/17</li> <li>v) Verified with bunch counter (AT245886) payslip for October 2017, he has worked for 31 days in October 2017 inclusive of rest day and public holiday.</li> </ul> <p>Based on interview with mandore and the said workers, they have confirmed that they worked on rest day without formal instruction from management. Document checked on the bunch counters’ payslip and harvester found that there were some different where the bunch counters were paid double rate of its daily rate whereas harvesters were paid on normal rate for their piece per rate on the next day</p>
<p><b>Corrective Actions:</b></p>	<p>1) Evaluation of Compliance against all details of the requirement in the ‘Permit Wanita Kerja Malam’</p> <p>2) Revised structure of Sunday work offer to be allowed during peak crops period subject to approvals decision by GM</p>
<p><b>Assessment Conclusion:</b></p>	<p><u>ASA2 verification</u></p> <p>During the verification of documents on site,</p> <ul style="list-style-type: none"> <li>i) Phone interviewed with officer from JTK Sabah confirmed that they have issued an approval letter for the mill to be excluded from the terms and conditions stated in the permit for female workers to work at night shift. Therefore, the company has no obligation to pay the night shift allowance to the female workers.</li> <li>ii) Document reviewed on the payslip and checkroll for harvesters and interviewed with harvesters confirmed that they are paying double of normal rate if they worked on rest day.</li> </ul> <p>Thus, there was no reoccurrence of the issue and the major non-conformance was remained closed.</p>

Non-Conformity			
<p><b>NCR Ref #</b></p>	<p>1559908-201709-M2</p>	<p><b>Clause &amp; Category (Major / Minor)</b></p>	<p>Indicator 6.5.2 Major</p>
<p><b>Closed (Yes / No)</b></p>	<p>Yes</p>	<p><b>Date of nonconformity Closure</b></p>	<p>19/01/2018</p>
<p><b>Statement of Nonconformity:</b></p>	<p>Contract of employment conditions available shown substandard conditions</p>		
<p><b>Requirement Reference:</b></p>	<p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions,</p>		



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	overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.
<b>Objective Evidence:</b>	Refer to Sabah OUs "Perjanjian Pekerjaan" , Employment Contract para 10; " Pekerja harian (tidak termasuk pekerja borong/pajak) jika diberi arahan dan kelulusan bertulis oleh majikan untuk bekerja pada hari rehatnya atau hari cuti umum, pekerja berhak mendapat bayaran gaji pada kadar berikut": a) Pada hari rehat - 2 kali ganda; b) Pada hari cuti umum - 3 kali ganda.  Sample of contract checked: i) Genting Bahagia Estate (B1104118, A6778643, AS259435, AS369872, AT680829, AT680829, AT245388) ii) Genting Landworthy Estate (AT 681340, EB 5779176) iii) Genting Layang Estate (AT 681368, AT245056, AT696581)
<b>Corrective Actions:</b>	Revision and issuance revised Employment Agreement (v3.0) by HRAD effective from Jan 2018, for implementation by all OUs at Sabah and regular monitoring on compliance of Sabah Labour Ordinance by OUs management.
<b>Assessment Conclusion:</b>	<u>ASA2 verification</u> Verified the Employment Contracts, revised on 01.01.2018 in Genting Tanjung Estate and Genting Landworthy Estate where under Clause 10, all the workers under daily rated and piece rated will be paid according to Sabah Ordinance 2005 if they obtained the written approval from management to work on rest day or public holiday. Thus, there was no reoccurrence of the issue and the major non-conformance was remained closed.

Non-Conformity			
<b>NCR Ref #</b>	1559908-201709-N1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.3.3 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	16/11/2018
<b>Statement of Nonconformity:</b>	Waste management and disposal plan is not implemented effectively.		
<b>Requirement Reference:</b>	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.		
<b>Objective Evidence:</b>	Genting Bahagia Estate (GBE) Sighted traces of oil on the ground surrounding the oil trap at the division 6 (diesel storage tank).		
<b>Corrective Actions:</b>	Conduct an annually training to the storekeeper on managing pollution control devices as per SMP-GPB-31-00		
<b>Assessment Conclusion:</b>	ASA2 verification: Verified that the proposed corrective action plan been effectively implemented at mill and both estates visited. The diesel storage tank was properly maintained and verified to be in satisfactory condition with no traces of oil on the ground surrounding the diesel storage tank oil trap in the audited mill/estates. Adequate pollution control methods been implemented with training been given to personnel in-charge of waste management in each operating unit to ensure the implementation is according to the SOP, guidelines and standards. The waste management and disposal plan been effectively documented and implemented & this minor nonconformance has been effectively closed on 16/11/18.		

Opportunity for Improvement	
OFI#	Description
OFI 1	

### 3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1369435M1	2.1.1	Major	23/08/2016	Closed out on 01/09/2016
1369435M1	4.7.2	Major	23/08/2016	Closed out on 01/09/2016
1559908-201709-M1	6.5.1	Major	24/11/2017	Closed out on 19/1/2018
1559908-201709-M2	6.5.2	Major	24/11/2017	Closed out on 19/1/2018
1559908-201709-N1	5.3.3	Minor	24/11/2017	Closed out on 16/11/2018
1707465-201808-M1	6.2.1	Major	16/11/2018	Closed out on 15/02/2019
1707465-201808-M2	6.7.1	Major	16/11/2018	Closed out on 15/02/2019
1707465-201808-N1	4.7.3	Minor	16/11/2018	"Open"
1707465-201808-N2	4.1.2	Minor	16/11/2018	"Open"
1707465-201808-N3	2.1.3	Minor	16/11/2018	"Open"
1707465-201808-N4	6.8.3	Minor	16/11/2018	"Open"

### 3.5. Stakeholders Consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Genting Tanjung Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO 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 later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.



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 below.

<b>List of Stakeholders Contacted</b>	
<b>Internal Stakeholders</b> Workers representative (by nationalities) Female workers Gender committee representative Mill operators Field workers Dependants	<b>Union/Contractors/Local Communities</b> Contractors/suppliers Neighbouring Plantation & FFB Suppliers HUMANA teacher
<b>Government Departments</b> Labour Department, Sabah	<b>NGO</b>

<b>IS #</b>	<b>Description</b>
<b>1</b>	<b>Feedbacks:</b> Workers' Representatives – The workers' representatives from three sampled sites informed that they were treated equally without discrimination. They had signed on the contract agreement and understood the terms and conditions stated. They were given option to keep the passport by themselves or surrender the passport to keep by management. They understood the policies in the company.
	<b>Management Responses:</b> The management will treat the workers equally and will not base on nationality, race, gender or caste.
	<b>Audit Team Findings:</b> No further issue.
<b>2</b>	<b>Feedbacks:</b> Contractors – The contractors informed that they were paid according to the signed agreement. No issue with the management and they have good relationship.
	<b>Management Responses:</b> The management will ensure the payment was made promptly.
	<b>Audit Team Findings:</b> Document reviewed on the payment advice confirmed that payment was made according to the agreement.
<b>3</b>	<b>Feedbacks:</b> Neighbouring Plantation & FFB Suppliers – There was no land encroachment by the company. There is electrical fencing to demarcate the boundary. They supplied the FFB to the mill and payment was made promptly.
	<b>Management Responses:</b> The management will ensure the boundary is maintained well and no encroachment occur.
	<b>Audit Team Findings:</b> No other issue.
<b>4</b>	<b>Feedbacks:</b> Female Workers in GTOM – Interviewed with the female workers who worked on night shift confirmed that they are not aware of the night shift allowance payment has been terminated since March 2018.
	<b>Management Responses:</b> The management has informed that they obtained the approval from the JTK Sabah that they are exempted from complying the terms and conditions stated in the permit issued by JTK earlier.
	<b>Audit Team Findings:</b> Communication procedure has not been implemented effectively as the female workers do not know about the updated information on the night shift allowance. Refer to indicator 6.2.1.

<p><b>5</b></p>	<p><b>Feedbacks:</b>  HUMANA teachers – The teachers informed that the managements have provided assistance to them whenever they requested. For eg: the management will have provided transportation to send the children to any activities outside the estates’ compound. Management from Genting Landworthy Estate has provided free computer, tables and chairs to the HUMANA as well.</p> <p><b>Management Responses:</b>  The management will continue to provide support whenever they request.</p> <p><b>Audit Team Findings:</b>  No further issue.</p>
<p><b>6</b></p>	<p><b>Feedbacks:</b>  Teenagers below age 14 years old – Interviewed with the teenager found in Crèche and she told that she is working in the field as loose fruits collector with her mother and a friend of her who is aged 12 years old.</p> <p><b>Management Responses:</b>  The management will ensure the issue will not repeat and will monitor thoroughly on the child labour issue.</p> <p><b>Audit Team Findings:</b>  Refer to Indicator 6.7.1.</p>
<p><b>7</b></p>	<p><b>Feedbacks:</b>  JTK Sabah Officer – Phone interviewed with the officer and he informed that no issue raised for Genting Tanjung Complex. He also informed that JTK has given approval to GTOM for exemption to comply with the terms stated in the earlier permit (Serial No.: 600-1/2/13/78(05/KBN/2018-067).</p> <p><b>Management Responses:</b>  The management will ensure they comply to legal requirements whenever necessary.</p> <p><b>Audit Team Findings:</b>  Seen the approval letter for exemption with Ref. No. JTK.H.IP.600-1/2/13/9 jld.4 dated 8/3/2018 was sighted.</p>

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<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Genting Tanjung Oil Mill has complied with the RSPO P&amp;C MY-NI 2014 &amp; RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Genting Tanjung Oil Mill is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> Mohamed Hidhir Zainal Abidin	<b>Name:</b> Arunan Kandasamy
<b>Company Name:</b> BSI Services Malaysia Sdn Bhd	<b>Company Name:</b> Genting Plantations Berhad
<b>Title:</b> Lead Auditor	<b>Title:</b> Senior Vice President-Plantation (Malaysia)
<b>Signature:</b> 	<b>Signature:</b> <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i>  KAK
<b>Date:</b> 2 <sup>nd</sup> April 2019	<b>Date:</b>

**Appendix A: Summary of Findings**

Criterion / Indicator		Assessment Findings	Compliance
<b>Principle 1: Commitment to Transparency</b>			
<b>Criterion 1.1:</b> Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Genting Plantations Berhad has issued a list of documents that could be access by the stakeholders to all the stakeholders during stakeholder meeting or by posted to the stakeholders. The documents that could be access are such as all the policies, SEIA report and the management plan, complaint & grievances procedure. Interviewed with the stakeholders such as contractor, local communities and internal workers confirmed that they are aware of it and understood that they have the rights to participate in the decision making.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	Genting Plantations Berhad has implemented Procedures on Requests and Response, Doc. No. SMP-GPB-25 dated 14/8/2014 to define management responsibilities to respond constructively and promptly to the information requested by stakeholders with sufficient objective evidence. All the requests will be recorded in the Enquiry Register Book. For eg: The Hospital Assistant has requested to carry out Gotong-royong at the housing complex on 14/7/2018. The management has organized the cleaning activity on 12/8/2018 and photo evident was sighted.	Complied
<b>Criterion 1.2:</b> Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			

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Criterion / Indicator	Assessment Findings	Compliance
<p>1.2.1</p> <p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> <li>• Land titles/user rights (Criterion 2.2);</li> <li>• Occupational health and safety plans (Criterion 4.7);</li> <li>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</li> <li>• HCV documentation (Criteria 5.2 and 7.3);</li> <li>• Pollution prevention and reduction plans (Criterion 5.6);</li> <li>• Details of complaints and grievances (Criterion 6.3);</li> <li>• Negotiation procedures (Criterion 6.4);</li> <li>• Continual improvement plans (Criterion 8.1);</li> <li>• Public summary of certification assessment report;</li> <li>• Human Rights Policy (Criterion 6.13).</li> </ul> <p>- Major compliance –</p>	<p>Publicly available documents sighted available which reported in respective criterions in this checklist. Policies also made publicly available that was Established as Sustainability Management Group Policies as following:</p> <ul style="list-style-type: none"> <li>• Sustainability Policy; Rev. 00; Date: 3/8/2009</li> <li>• Environmental Policy; Rev. 00; Date: 5/10/2009</li> <li>• People Policy; Rev. 00; Date: 3/8/2009</li> <li>• Sexual Harassment Policy; Rev. 00; Date: 3/8/2009</li> <li>• Safety and Health Policy; Rev. 01; Date: 1/7/2015</li> <li>• Zero Burning Policy; Rev. 00; Date: 10/8/2011</li> <li>• Food Safety Policy; Rev. 00; Date: 2/2/2010</li> <li>• Whistleblower Policy; Rev. 00; Date: 4/4/2013</li> <li>• MSPO Policy; Rev. 00; Date: 18/3/2014</li> <li>• Policy on Ethical Conduct and Integrity; Rev. 00; Date: 22/6/2015</li> <li>• Social Policy (Incorporating Special Labour and Human Rights requirements); Rev. 00; Date: 22/6/2015</li> </ul> <p>All policies were available in dual language (BM &amp; English) and signed Genting Plantations Berhad President &amp; COO.</p>	<p>Complied</p>
<p><b>Criteria 1.3:</b>            Growers and millers commit to ethical conduct in all business operations and transactions.</p>		

Criterion / Indicator		Assessment Findings	Compliance
1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance	Genting Plantations Berhad has developed Ethical Conduct and Integrity Policy dated 22/6/2015. The company is committed to conduct its business ethically and with integrity at all times. The following values need to be followed by all the employees: <ul style="list-style-type: none"> <li>i. Respect for fair conduct of business</li> <li>ii. Refrain from all forms of corruption, bribery and fraudulent use of funds and resources</li> <li>iii. Respect and protect confidential and/ or privileged information to which we have access in the course of our duties</li> </ul> Briefing of the policy was conducted on 13/1/2018 and policy was displayed in the notice board at the office area.	Complied
<b>Principle 2: Compliance with applicable laws and regulations</b>			
<b>Criterion 2.1:</b>			
There is compliance with all applicable local, national and ratified international laws and regulations.			



<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available.          - Major compliance -</p>	<p>Genting Tanjung Oil Mill and supply base had continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. POM had obtained and renewed license and permits as required by the law.</p> <p>Genting Tanjung Oil Mill has obtained permit for overtime exceeded 104 hours from Jabatan Tenaga Kerja Sabah. The permit with Serial No.: 600-1/2/13/78(08/KBN/2018-068) which valid from 5/4/2018 – 5/4/2020 for overtime not more than 120 hours per month.</p> <p>Sample of licenses or permit viewed were :</p> <p><u>Genting Tanjung POM:</u></p> <ol style="list-style-type: none"> <li>1. Certificate of Fitness for Unfired Pressure Vessels:-             <ol style="list-style-type: none"> <li>a. (JKT15-Pin. 1/87 PMT-SB/18 017450) – SB PMT 14627 (valid till 01/11/2019).</li> <li>b. (JKT15-Pin. 1/87 PMT-SB/18 017449) – SB PMT 7177 (valid till 02/08/2018).</li> <li>c. (JKT15-Pin. 1/87 PMT-SB/18 017446) – SB PMT 12997 (valid till 1/11/2018).</li> </ol> </li> <li>2. MPOB license: 595974115000 (validity period 01/04/2018 - 31/03/2019)</li> <li>3. Diesel permit serial no: S014370, ref: PPDNKK.SDK.1/2014(SK), validity 24/06/2018 – 23/06/2019.</li> <li>4. Fire Certificate Ref. No. JBPM:SB/7/49/2018 S/N#309048, validity 6/02/2018 – 5/02/2019.</li> <li>5. DOE License/Jadual Pematuhan: 001877 (validity period 01/07/2018 - 30/06/2019) for 80 MT/hr and method of POME discharge through land application (furrow system).</li> </ol>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>6. Competent Person for Certified Environmental Professional in the Treatment of Palm Oil Mill Effluent (CePPOME), S/N# CePPOME/00007</p> <p>7. Competent Person Certified Environmental Professional in Scheduled Waste Management (CePSWaM) for 900614-12-6059 (attended training on 23/7/18-27/7/18).</p> <p><u>Genting Tanjung Estate:</u></p> <p>1. Diesel permit serial no: S014164, ref: PPDNKK.SDK.1/2011(SK), validity 7/02/2018 – 6/02/2019.</p> <p>2. Certificate of Fitness for Unfired Pressure Vessels:- (JKT15-Pin. 1/87 PMT-SB/18 15115) – SB PMT 10428 (valid till 01/11/2019).</p> <p>3. MPOB license: 502249802000 (validity period 01/09/2018 - 31/08/2019)</p> <p>4. Energy Commission license no: 2018/1054, serial: 28705 for capacity 32 kW (validity 09/05/2018 – 08/05/2019).</p> <p><u>Genting Landworthy Estate:</u></p> <p>1. Peraturan-Peraturan Pendidikan (Pendidikan Institusi Pendidikan) 1997, Registration for Pusat Bimbingan Humana Reg. No. XZ7B012 valid until 2/3/19.</p> <p>2. Certificate of Fitness for Unfired Pressure Vessels:- (JKT15-Pin. 1/87 PMT-SB/18 17010) – SB PMT 10426 (valid till 29/11/2019).</p> <p>3. Energy Commission license no: 2017/02538, serial: 24535 for capacity 108 kW (validity 14/12/2017 – 13/12/2018).</p> <p>4. Diesel permit serial no: S014402, ref: PPDNKK.SDK.1/2005(SK) BL2201809744, validity 24/06/2018 – 23/06/2019.</p>	

Criterion / Indicator		Assessment Findings	Compliance
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	Documented system including Legal Requirements Register (Doc: SMP-GPB-22; revision 06 dated 28/05/2018) is available. The content of the register as below: 1. List of local legal requirements applicable to plantation operations in Malaysia 2. List of international standards/requirements applicable to plantation operation in Malaysia: a. Part 1: Environment b. Part 2: Safety and Health c. Part 3: Social d. Part 4: Best Practices and other requirements e. Part 5: International Standards/Requirement	Complied

<p>2.1.3</p>	<p>A mechanism for ensuring compliance shall be implemented.          - Minor compliance -</p>	<p>A mechanism to ensure compliance to legal and other requirement has been documented in Procedures on Regional, National and International Laws (Doc: SMP-GPB-21; revision 01 dated 14/08/2014).</p> <p>In Genting Tanjung Oil Mill and Genting Tanjung Estate has found that workers' permits had expired and under process of renewal. Sampled of the work permits that expired as below:</p> <ul style="list-style-type: none"> <li>a. Permit No.: PD 9134067 valid until 20/8/2018 (GTJE)</li> <li>b. Permit No.: PD 9136744 valid until 8/11/2018 (GTJE)</li> <li>c. Permit No.: PD 9136739 valid until 8/11/2018 (GTJE)</li> <li>d. Permit No.: PD 9136740 valid until 8/11/2018 (GTJE)</li> <li>e. Permit No.: PD 8903693 valid until 25/7/2018 (GTJE)</li> <li>f. Permit No.: PD 9117270 valid until 20/8/2018 (GTJE)</li> <li>g. Permit No.: PD 9139441 valid until 30/10/2018 (GTOM)</li> <li>h. Permit No.: PD 9134231 valid until 28/9/2018 (GTOM)</li> <li>i. Permit No.: PD 8914820 valid until 20/8/2018 (GLWE)</li> <li>j. Permit No.: PD 7851415 valid until 6/5/2018 (GLWE)</li> <li>k. Permit No.: PD 9574534 valid until 30/10/2018 (GLWE)</li> <li>l. Permit No.: PD 7629758 valid until 6/3/2018 (GLWE)</li> <li>m. Permit No.: PD 9136429 valid until 30/8/2018 (GLWE)</li> <li>n. Permit No.: PD 7851445 valid until 5/6/2018 (GLWE)</li> </ul> <p>Besides, document reviewed found that there were dependents who were born in Indonesia who possessed passport and Visit Pass (Social). However, sampled of the Visit Pass found that the following passes below were expired:</p> <ul style="list-style-type: none"> <li>a. Permit No.: PD 6135428 valid until 20/8/2017 (GLWE)</li> <li>b. Permit No.: PD 8291832 valid until 5/6/2018 (GLWE)</li> <li>c. Permit No.: PD 8902545 valid until 18/8/2018 (GLWE)</li> <li>d. Permit No.: PD 7848969 valid until 4/6/2018 (GLWE)</li> <li>e. Permit No.: PD 6135494 valid until 18/6/2017 (GLWE)</li> </ul>	<p>Minor nonconformance</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>f. Permit No.: PD 8902008 valid until 6/7/2018 (GTJE)  g. Permit No.: PD 8902011 valid until 6/7/2018 (GTJE)  h. Permit No.: PD 7330339 valid until 3/2/2018 (GTJE)  i. Permit No.: PD 8902006 valid until 18/6/2018 (GTJE)  j. Permit No.: PD 9136467 valid until 19/7/2018 (GTJE)  k. Permit No.: PD 8291657 valid until 28/6/2018 (GTJE)</p> <p>In additional, verified the name list of dependents (without passport and visit pass) in GLWE found that total 115 children from Indonesia. Total 24 children were born in Indonesia and 91 children were born in Malaysia were without valid passport and valid pass to stay in Malaysia.</p> <p>Mechanism of ensuring compliance of legal requirement was ineffective. In the Legal Requirement Register dated 27/3/2018 has included Immigration Act 1959/63 – Act 155, Section 15 (1) subsection (c).</p> <p><u>Genting Tanjung Estate</u>  Based on permit issued by Labour Department, ref: JTK.H.KBN.600-4/1/01261/0378 validity period 28/3/18 -27/3/19, 391 Indonesian and 5 Philippines workers approved for the permit. The latest workers master list as at October 2018 reported with additional of 50 new workers (total of 441). No evidence of additional quota approval obtained for the said workers as to date. Thus, a minor NC was raised.</p>	

Criterion / Indicator		Assessment Findings	Compliance
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	Genting Plantations Berhad has established a documented Procedures on Regional, National and International Laws (Doc: SMP-GPB-21; revision 01 dated 14/08/2014) for tracking any changes in the law. For the changes of laws, the company will refer to as below: 1. Notification of changes from various source of information 2. Monitoring for changes in the Law 3. Clarification and review on the changes 4. Updating of the Legal register administered internally 5. Notification to the operating units and/or the relevant person in charge Currently, the person/team responsible for monitoring the changes and communicating in POM is the Mill Engineer.	Complied
<b>Criterion 2.2:</b> The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.			

Criterion / Indicator	Assessment Findings	Compliance
2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	<p>Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land available at all visited estates. Sample of land titles checked:</p> <p><u>Genting Tanjung Estate</u>            Hold 2 land titles (main division and sub-division)</p> <ul style="list-style-type: none"> <li>i) Title # Country Lease (CL) 095316993; 4,273.87 ha, lease period 1/1/1998– 31/12/2086 (88 years), legal use of land (cultivation of an agricultural crop of economic value), locality: Tenegang Besar (District of Kinabatangan)</li> <li>ii) Title # Country Lease (CL) 095327129; 192.40 ha, lease period 1/1/1998– 31/12/2096 (98 years lease); legal use of land (cultivation of oil palm), locality: Tenegang (District of Kinabatangan)</li> </ul> <p><u>Genting Landworthy Estate</u>            Hold 1 land title            Title # Country Lease (CL) 095316975; 4,039 ha, lease period 1/1/1985– 31/12/2083 (98 years), legal use of land (cultivation of an agricultural crop of economic value), locality: Kinabatangan (District of Kinabatangan)</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	At all visited estates, noted that boundary is visibly maintained and demarcated. Legal Observed during site visit at;  <u>Genting Tanjung Estate</u> Legal boundary (stone and marker) is clearly visible at block 4 adjacent with Hari Maju Estate. Boundary marker no. 914/912 is located at coordinate N 5° 26.439', E 118° 15.249'.  <u>Genting Landworthy Estate</u> Legal boundary (stone and marker) is clearly visible at block 18 adjacent with Hari Maju Estate. Boundary marker no. 979/518 is demarcated on site. Coordinate location N 05° 23.158' E 118° 8.807'	Complied
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified. Interviewed with the neighboring plantations confirmed that no land dispute reported. Trenches and legal boundary stones were sighted to demarcate the boundary.	Complied
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified. Interviewed with the neighboring plantations confirmed that no land dispute reported. Trenches and legal boundary stones were sighted to demarcate the boundary.	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified. Interviewed with the neighboring plantations confirmed that no land dispute reported. Trenches and legal boundary stones were sighted to demarcate the boundary.	Complied



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Criterion / Indicator		Assessment Findings	Compliance
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified. Interviewed with the neighboring plantations confirmed that no land dispute reported. Trenches and legal boundary stones were sighted to demarcate the boundary.	Complied
<b>Criterion 2.3:</b> Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified. Interviewed with the neighboring plantations confirmed that no land dispute reported. Trenches and legal boundary stones were sighted to demarcate the boundary.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>2.3.2</p> <p>Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include:</p> <p>a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making;</p> <p>b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken;</p> <p>c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	<p>There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified. Interviewed with the neighboring plantations confirmed that no land dispute reported. Trenches and legal boundary stones were sighted to demarcate the boundary.</p>	<p>Complied</p>
<p>2.3.3</p> <p>All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>-Minor compliance</p>	<p>There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified. Interviewed with the neighboring plantations confirmed that no land dispute reported. Trenches and legal boundary stones were sighted to demarcate the boundary.</p>	<p>Complied</p>
<p>2.3.4</p> <p>Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel.</p> <p>-Major compliance</p>	<p>There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified. Interviewed with the neighboring plantations confirmed that no land dispute reported. Trenches and legal boundary stones were sighted to demarcate the boundary.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 3: Commitment to long-term economic and financial viability</b>			
<b>Criterion 3.1:</b>			
There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	<p>A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders.</p> <p>- Major compliance -</p>	<p>Genting Tanjung POM has gazetted forecast budget for FY2019 to FY2023 is evident in Genting Tanjung Oil Mill projection for year 2019 to year 2023. The projection covers cop intake from own estate, from outside purchase (smallholders), total intake, processing cost and extraction rate (OER &amp; KER). Similar projection available for the estate as well.</p> <p>Example of CAPEX for 2019:</p> <p><u>Genting Tanjung POM</u></p> <ul style="list-style-type: none"> <li>i) Residential: rehabilitation of overhead cable to Danau Tay and housing area.</li> <li>ii) Plant &amp; machinery: replacement (ash conveyor no.2 and 3) and 2 units of water softener</li> <li>iii) Regulatory requirements – Effluent final discharge pump, air pollution control system @ ESP for boiler no.2 and 3, dust/opacity monitoring system</li> </ul> <p><u>Genting Tanjung Estate</u></p> <ul style="list-style-type: none"> <li>i) Residential/building: new concrete labour quarters 1x4</li> <li>ii) Roads and bridges: road resurfacing (700 chain)</li> <li>iii) Plant and machinery: Superbull 4WD and Farm Tractor 80hp</li> </ul> <p><u>Genting Landworthy Estate</u></p> <ul style="list-style-type: none"> <li>i) Residential/building: new concrete labour quarters 1x2</li> <li>ii) Roads and bridges: road gravelling (600 chain)</li> <li>iii) Plant and machinery: Farm tractor, prime mover with hook lift and backhoe.</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance								
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	Annual replanting programme projected for a minimum of five years from 2019 to 2023 and yearly review conducted at the head office level and participated by the Regional GM and Estate managers. On-going replanting programme for 2018 reported as per below: <table border="1" data-bbox="1025 523 1823 628"> <thead> <tr> <th>Estate</th> <th>Total Area</th> <th>Justification/Remark</th> </tr> </thead> <tbody> <tr> <td>Genting Tanjung</td> <td>423.75 ha</td> <td rowspan="2">Low yield/tall palm</td> </tr> <tr> <td>Genting Landworthy</td> <td>187.97 ha</td> </tr> </tbody> </table>	Estate	Total Area	Justification/Remark	Genting Tanjung	423.75 ha	Low yield/tall palm	Genting Landworthy	187.97 ha	Complied
Estate	Total Area	Justification/Remark									
Genting Tanjung	423.75 ha	Low yield/tall palm									
Genting Landworthy	187.97 ha										
<b>Principle 4: Use of appropriate best practices by growers and millers</b>											
<b>Criterion 4.1:</b> Operating procedures are appropriately documented, consistently implemented and monitored.											

<p>4.1.1</p>	<p>Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p>	<p>Genting Tanjung POM has continued implement the established procedures for operation. The documentation hierarchy consist of 3 tiers of procedure that established which were Procedure Manual, System Procedure, Sustainability Management Procedure Manual, Safe Operating Procedure and Environmental Control Procedure. There are changes and revision for;</p> <p>i) SOP for Sterilizer, GTOM-SOP-PRD-03, rev:7 dated 6/10/18 revised after occurrence of accident on 5/10/18. ii) Standard Operating Manual for mill laboratory, SOM-LAB-11, rev:05 dated 27/6/18 revised due to amendment of test method for MPD composition and oil content analysis.</p> <p>For estates, the Sustainability Management Procedure Manual, Standard Operating Procedures (SOP) and The Oil Palm Manual (latest update on 30/8/13) were established. The manual covering the activity for replanting, oil palm nursery practices, planting techniques, soil conservation and terracing, pest and diseases, weed management, manuring of oil palm, immaturity, harvesting, crop forecasting and managing fragile soils. All of the activities have been described comprehensively in the Standard operating procedure (SOP) and pictorial SOP. All the estate implemented through its daily operations.</p> <p>The procedure for Occupational Health and Safety has been established and implemented. Sighted the procedure for Accident investigation, PTW, PPE, workshop, harvesting, manuring, pest &amp; disease were available during the assessment. The procedure for mechanization was established and available at estate office. Sighted the procedure, namely Group Plantation Advisory dated 16/4/2013:</p> <ol style="list-style-type: none"> <li>1. Structured Cluster Harvesting : MECH-01</li> <li>2. Mechanically Assisted Collection (MAC): MECH-02</li> </ol>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		3. Buffalo Assisted Collection (BAC):MECH-03A 4. Buffalo Training: MECH-03B 5. Buffalo Selection and Haulage: MECH-03C	
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	<p>Genting Landworthy Estate In House Clinic:            The medicine inventory control and its ordering process mechanism found to be not fully effective. Visit to the Genting Landworthy Estate in house clinic found that the fever medicine syrups for children has no stock and currently adult paracetamol tablets are used as temporary replacement. Further verification indicate that the Internal Pre-Order Form dated 27/10/18 was yet to be processed for approval of medicine purchase.</p> <p>Agronomist from GPRD inspect and report on the operations on annual basis. There were other audits by carried out by SHO and Sustainability Team to ensure compliance against company policy and procedure with regards to operation, safety, health and welfare requirements.</p>	<p>Minor nonconformance</p>

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Criterion / Indicator		Assessment Findings	Compliance
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	<p>Annual agronomist visit was carried out last year on 18-19/4/18 by GPRC Department for Genting Tanjung Estate. A few issues identified from the visit related to manuring progress and standard, supplement of EFB, pest and disease as well as weed management. Latest visit at Genting Landworthy estate was done on 24-25/4/18. Issues related to crop production, fertilizer application and LF collection delay were reported and requires further improvement.</p> <p>Group Plantation Advisory (GPA) is scheduled once per year. For Genting Tanjung Estate, the visit is focus more on replanting area due to on-going progressive replanting programme at the estate. Refer to the last visit report dated 22/8/17. In overall, the rating is 90% (good) based on assessment at 14 replanting blocks. For this year, GPA assessment is scheduled on December 2018.</p> <p>Combined RSPO and MSPO internal audit was last carried out on 17/10/18 by Sustainability Team and SHO. No NC raised in the latest audit.</p> <p>SHO visit carried out on monthly basis by Genting Tenegang Group SHO, HQ/18/SHO/01/01533. Refer to the latest visit on 8/11/18. Noted there were some comments PPE and safety issues related to FFB transporter.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	<p>The origins of all third-party sourced Fresh Fruit Bunches (FFB) is verified via list of approved FFB supplier rev:6, dated 28/7/17.</p> <p>Legality of the FFB supplier is checked and verified. MPOB license sampled:</p> <ul style="list-style-type: none"> <li>i) Malbumi Estate Sdn Bhd, MPOB license 502782102000 valid until 30/11/18.</li> <li>ii) Tenera Eco Plantation Sdn Bhd, MPOB license 562985002000 valid until 31/07/19</li> <li>iii) Ace Foremost Sdn Bhd, MPOB license 503622702000 valid until 31/1/19</li> </ul> <p>For non-certified FFB, no traceability identification stamped in the FFB delivery note and only stamped for certified FFB under RSPO and ISCC.</p>	Complied
<p><b>Criterion 4.2:</b>            Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			



Criterion / Indicator		Assessment Findings	Compliance
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	<p>GBSE continuously implement practices good agricultural practices as guided in the SOPs [Oil Palm Manual (OPM), dated 30/8/2013]. No changes noted in the OPM as to date. OPM is the guideline to manage the soil fertility to levels ensuring optimal and sustainable yields for the estate.</p> <p>One of the SOP procedures, OPM 7: Manuring of Oil Palm is referred for managing soil fertility. It includes sections on :</p> <ul style="list-style-type: none"> <li>a) Introduction</li> <li>b) Nursery manuring</li> <li>c) Field Manuring</li> <li>d) Application of Fertiliser</li> <li>e) Fertiliser delivery and Stock Reports for estates</li> <li>f) Fertiliser sampling for analysis</li> <li>g) Manuring Schedule</li> <li>h) Method of application for younger and mature palms</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance											
4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	<p>Fertilizers are applied as per agronomist recommendation. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. 2018 Fertiliser Programme by Genting Plantations Research Centre (GPRC) dated 4/1/18 was sighted. The recommended fertilizer and total tonnage as per the following:</p> <p><u>Genting Tanjung Estate</u>            NK Mix B (AS): 261.75 mt            ERP: 75.70 mt</p> <p><u>Genting Kinavest Division</u>            NK Mix B (AS): 161.7 mt            BRP: 48.85 mt            AC: 40.50 mt            Mix MgO Bor: 42.80 mt</p> <p>For 2018, fertilizer application has been completed in September 2018. Example of application for young mature (3-7 years), division 2 (field 21-25) as per the following:</p> <table border="1"> <thead> <tr> <th>Fertilizer</th> <th>Month</th> <th>Tonnage applied</th> <th>Area applied</th> </tr> </thead> <tbody> <tr> <td>NK Mix B (AS)</td> <td>September 2018</td> <td>91.90 mt</td> <td rowspan="2">281.39 ha</td> </tr> <tr> <td>BRP</td> <td>June 2018</td> <td>64.30 mt</td> </tr> </tbody> </table>	Fertilizer	Month	Tonnage applied	Area applied	NK Mix B (AS)	September 2018	91.90 mt	281.39 ha	BRP	June 2018	64.30 mt	Complied
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4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	<p>The agronomist from GPRC will visit the estate and conduct the sampling on annual basis. Based on Soil Sampling Procedure dated 1/12/17, the frequency of analysis is every 5 years.</p> <p><u>Genting Tanjung Estate</u> The last soil sampling was carried out on June 2017, refer to report SR15/2017 dated 16/8/17. The latest foliar analysis was conducted on May 2018 and the samples were sent to GPRC Laboratory for analysis. Foliar analysis report (PR44/2018) dated 9/7/18 was sighted.</p> <p><u>Genting Landworthy Estate</u> Soil analysis was last carried out on 26/2/15 by GPRC. Report ref: SR05/2015 dated 25/4/15 was verified. Foliar analysis was done on 17/7/18 and sent to GPRC Laboratory for analysis. Foliar analysis report (PR55/2018) dated 7/8/18 was sighted.</p>	Complied											
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	<p>Based on SOP Manual, OPM 7: Manuring of Oil Palm, the nutrient strategy includes the use of Empty Fruit Bunches (EFB) distributed in the field to improve the soil structure as well as to improve the organic matter. Recommendation per round is 20 mt/ha/year (immature and mature). POME applied to selected field at Genting Tanjung Estate consist of block 10,14, 16, 17, 18 and 19 with total of 55.17 ha.</p> <table border="1"> <thead> <tr> <th>Division</th> <th>Applied tonnage</th> <th>Recommendation</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Tanjung (main)</td> <td>6,564.05 mt</td> <td>20 mt per round</td> <td rowspan="2">To date application as of October 2018</td> </tr> <tr> <td>Kinavest</td> <td>5,734.60 mt</td> <td>20 mt per round</td> </tr> </tbody> </table>	Division	Applied tonnage	Recommendation	Remarks	Tanjung (main)	6,564.05 mt	20 mt per round	To date application as of October 2018	Kinavest	5,734.60 mt	20 mt per round	Complied
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<b>Criterion 4.3:</b> Practices minimise and control erosion and degradation of soils.																																					
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	<p>Soil series map available for both estates visited. Summary of soil type as per table below:</p> <table border="1"> <thead> <tr> <th>Soil Series</th> <th>Percentage/Hectare</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>Buran</td> <td>19.19% (825.44 ha)</td> <td rowspan="8">Genting Tanjung</td> </tr> <tr> <td>Jeram 3</td> <td>3.36% (144.37 ha)</td> </tr> <tr> <td>Jeram 4</td> <td>1.79% (77.16 ha)</td> </tr> <tr> <td>Jeram 5</td> <td>1.48% (63.81 ha)</td> </tr> <tr> <td>Lundang</td> <td>10.76% (462.80 ha)</td> </tr> <tr> <td>Kumansi 3</td> <td>6.27% (281.89 ha)</td> </tr> <tr> <td>Kumansi 4</td> <td>3.19% (137 ha)</td> </tr> <tr> <td colspan="3"><i>*Refer to soil map dated 29/10/18 prepared by GPRC Sabah</i></td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Soil Series</th> <th>Percentage/Hectare</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>Bidu-bidu</td> <td>8.31% (335.47 ha)</td> <td rowspan="3">Genting Landwort</td> </tr> <tr> <td>Kretam</td> <td>78.94% (3,187.94 ha)</td> </tr> <tr> <td>Lungmanis</td> <td>515.15% (12.76 ha)</td> </tr> <tr> <td colspan="3"><i>*Refer to soil map dated 1/10/17 prepared by GPRC Sabah</i></td> </tr> </tbody> </table> <p>Based on the soil map, there is no other fragile and problem soils found at both visited estates.</p>	Soil Series	Percentage/Hectare	Estate	Buran	19.19% (825.44 ha)	Genting Tanjung	Jeram 3	3.36% (144.37 ha)	Jeram 4	1.79% (77.16 ha)	Jeram 5	1.48% (63.81 ha)	Lundang	10.76% (462.80 ha)	Kumansi 3	6.27% (281.89 ha)	Kumansi 4	3.19% (137 ha)	<i>*Refer to soil map dated 29/10/18 prepared by GPRC Sabah</i>			Soil Series	Percentage/Hectare	Estate	Bidu-bidu	8.31% (335.47 ha)	Genting Landwort	Kretam	78.94% (3,187.94 ha)	Lungmanis	515.15% (12.76 ha)	<i>*Refer to soil map dated 1/10/17 prepared by GPRC Sabah</i>			Complied
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<p>4.3.2</p>	<p>A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -</p>	<p>The estate will refer to the following procedures for guidance a) OPM 4 : Soil conservation and terracing( rev 2013 ) b) Steep land Management SMP–GPB-10, rev:0 dated 11/10/13.</p> <p><u>Genting Tanjung Estate</u></p> <table border="1"> <thead> <tr> <th>Terrain Classes</th> <th>Areas (ha)</th> <th>Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>Flat (0-2°)</td> <td>1,757.76</td> <td>39.12</td> </tr> <tr> <td>Undulating (2- 6°)</td> <td>1,733.77</td> <td>38.59</td> </tr> <tr> <td>Rolling (6-12°)</td> <td>875.31</td> <td>19.48</td> </tr> <tr> <td>Hilly (12-20°)</td> <td>120.08</td> <td>2.67</td> </tr> <tr> <td>Steep (20-25°)</td> <td>6.14</td> <td>0.14</td> </tr> <tr> <td>Very Steep, &gt;25°</td> <td>0</td> <td>0</td> </tr> <tr> <td>Total</td> <td>4,493.06</td> <td>100</td> </tr> </tbody> </table> <p><u>Genting Landworthy Estate</u></p> <table border="1"> <thead> <tr> <th>Terrain Classes</th> <th>Areas (ha)</th> <th>Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>Flat (0-2°)</td> <td>1,217.87</td> <td>30.16</td> </tr> <tr> <td>Undulating (2- 6°)</td> <td>2,095.69</td> <td>51.90</td> </tr> <tr> <td>Rolling (6-12°)</td> <td>721.18</td> <td>17.86</td> </tr> <tr> <td>Hilly (12-20°)</td> <td>3.47</td> <td>0.09</td> </tr> <tr> <td>Steep (20-25°)</td> <td>0</td> <td>0</td> </tr> <tr> <td>Very Steep, &gt;25°</td> <td>0</td> <td>0</td> </tr> <tr> <td>Total</td> <td>4,038.21</td> <td>100</td> </tr> </tbody> </table> <p>Clause 7.1 – Step Land Management Steep &gt;25° shall not be planted and consistent with environmental conditions, under clause 5.4.1 (prohibition of development of oil palm plantation), ref: JPAS/PP/17/600-1/11/1/86(61) dated 12/5/10. These areas shall be demarcated and conserved as</p>	Terrain Classes	Areas (ha)	Percentage (%)	Flat (0-2°)	1,757.76	39.12	Undulating (2- 6°)	1,733.77	38.59	Rolling (6-12°)	875.31	19.48	Hilly (12-20°)	120.08	2.67	Steep (20-25°)	6.14	0.14	Very Steep, >25°	0	0	Total	4,493.06	100	Terrain Classes	Areas (ha)	Percentage (%)	Flat (0-2°)	1,217.87	30.16	Undulating (2- 6°)	2,095.69	51.90	Rolling (6-12°)	721.18	17.86	Hilly (12-20°)	3.47	0.09	Steep (20-25°)	0	0	Very Steep, >25°	0	0	Total	4,038.21	100	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		Conservation Set Aside (CSA). LCC need to be established at terrace area to minimize soil erosion.	
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	<u>Genting Tanjung Estate</u> The road maintenance programme was established to cover the road patching/compacting and road grading activities. Latest update for to date (July 2018) road management programme checked: Road patching/compacting: 1006.95 chain Road grading: 898.96 chain	Complied
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	No peat of problematic/fragile soil at both visited estates	Complied
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	No peat of problematic/fragile soil at both visited estates	Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	No peat of problematic/fragile soil at both visited estates	Complied
<b>Criterion 4.4:</b> Practices maintain the quality and availability of surface and ground water.			

Criterion / Indicator		Assessment Findings	Compliance												
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	<p>Genting Tanjung POM: Water management plan for raw water &amp; drinking water (as per SOM-LAB-12 &amp; SOP-LAB-03) dated 30/10/2018 was established. The plan was implemented and monitored on monthly basis by the Mill Engineer.</p> <p>Genting Tanjung Estate: The water management plan dated 16/1/2018 has been established. The plan was implemented and monitored on monthly basis by the Estate Manager.</p> <p>Genting Landworthy Estate: The water management plan dated 16/10/2018 has been established. The plan was implemented and monitored on monthly basis by the Estate Manager.</p>	Complied												
4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -	<p>Documented under GPB's Sustainability Management Procedure Manual, SMP-GPB-14, rev:1 dated 14/8/14, riparian buffer zones established in lined with Sabah Water Resources Enactment 1998 as per the following:</p> <table border="1"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>&gt; 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>20 meters</td> </tr> <tr> <td>3 - 5 meters</td> <td>20 meters</td> </tr> </tbody> </table> <p>Water Sampling analysis (inlet – to estate and outlet – to Sg Tenegang Besar, tributary of Sg Kinabatangan) was conducted on 26/02/2018. Refer to report dated 9/3/18, ref:CK/CL405/0691/18. All parameter tested comply with class III of National Water Quality Standard of Malaysia (NWQSM).</p>	River width	Buffer zone	> 40 meters	50 meters	20 to 40 meters	40 meters	10 to 20 meters	20 meters	5 to 10 meters	20 meters	3 - 5 meters	20 meters	Complied
River width	Buffer zone														
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Criterion / Indicator		Assessment Findings	Compliance								
4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	<p>Based on the effluent final discharge analysis, all the parameters have been complied with. Analysis was done once and every month and submitted to the authority on quarterly basis. The following parameters (BOD, TSS, Ammonical Nitrogen, Total Nitrogen, Oil &amp; Grease, pH, COD, Total Suspended Solids) are checked by independent Lab, KL-Kepong (SABAH) Sdn. Bhd.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Oct-18</th> <th>Sept-18</th> <th>Aug-18</th> </tr> </thead> <tbody> <tr> <td>Final Discharge Results (BOD) mg/l</td> <td>17</td> <td>19</td> <td>18</td> </tr> </tbody> </table> <p>Quarterly report to DOE has been forwarded. The following record has been reviewed and report dated: 3rd quarter 30/9/2018, 2nd quarter 30/06/2018 and 1st quarter 31/03/2018 were sighted during the audit.</p>	Month	Oct-18	Sept-18	Aug-18	Final Discharge Results (BOD) mg/l	17	19	18	Complied
Month	Oct-18	Sept-18	Aug-18								
Final Discharge Results (BOD) mg/l	17	19	18								
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	<p>Water consumption per tonne of FFB is being monitored. Verified the following water consumption data:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Oct-18</th> <th>Sept-18</th> <th>Aug-18</th> </tr> </thead> <tbody> <tr> <td>m<sup>3</sup>/MT</td> <td>1.19</td> <td>1.21</td> <td>1.26</td> </tr> </tbody> </table>	Month	Oct-18	Sept-18	Aug-18	m <sup>3</sup> /MT	1.19	1.21	1.26	Complied
Month	Oct-18	Sept-18	Aug-18								
m <sup>3</sup> /MT	1.19	1.21	1.26								
<p><b>Criterion 4.5:</b>  Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>											



Criterion / Indicator		Assessment Findings	Compliance
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	<p>The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators. The estates are continue to plant beneficial plants such as Turnera subulata. IPM strategies for Genting Tanjung Estate:</p> <p>i) Beneficial plant: 6:2:2 (current planted area : 1000 chain, expected: 1200 chain) [Turnera: Cassia : Antigonon]                      ii) Barn owl box: Occupancy rate average at 45% (2<sup>nd</sup> round in August 2018) together with BOB maintenance and replacement/new box. Target on the BOB placement is 1 every 15 Ha.</p> <p><u>Genting Landworthy Estate</u>                      Progress of IPM implementation is only towards on cultivation and establishment of beneficial plant in the estate. To date, 600 chain has been planted with beneficial plant. Currently, BOB has not been practice in the estate. Survival rate is very low for Tyto Alba species.</p>	Complied
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>Training records for staff and workers on IPM implementation were available and verified to be satisfactory during on-site assessment. Latest training dated 16-17/5/18 was carried out by GPRC personnel for the Tenegang Group Estates.</p>	Complied
<p><b>Criterion 4.6:</b>                      Pesticides are used in ways that do not endanger health or the environment</p>			

Criterion / Indicator		Assessment Findings	Compliance												
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	The SOP and justification of pesticide used documented under Sustainability Management Procedure Manual, SMP-GPB-28, rev:4 dated 3 July 2018. a) Crop stage b) Application Type c) Pesticide Names d) Active Ingredient e) Class ( by Pesticide Malaysia ) f) WHO class g) Target Weed/Pest h) Justification of Use Amendment to include nursery fungicide (Dixan – Mancozeb), Arakus, Fezmet, Pestac and Kenlate.	Complied												
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	The records of pesticides used were available at Genting Tenegang Group estate. Sighted record which was update on 12/11/18. Summary of chemical usage trend for the last 3 years as follow: <table border="1" data-bbox="1025 911 1823 1018"> <thead> <tr> <th>Usage</th> <th>2016</th> <th>2017</th> <th>2018 (to date)</th> </tr> </thead> <tbody> <tr> <td>Kg/Ha</td> <td>0.60</td> <td>0.040</td> <td>0.053</td> </tr> <tr> <td>Ai/Ha</td> <td>1.321</td> <td>0.815</td> <td>0.770</td> </tr> </tbody> </table>	Usage	2016	2017	2018 (to date)	Kg/Ha	0.60	0.040	0.053	Ai/Ha	1.321	0.815	0.770	Complied
Usage	2016	2017	2018 (to date)												
Kg/Ha	0.60	0.040	0.053												
Ai/Ha	1.321	0.815	0.770												

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.3 Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines.                      - Major compliance -</p>	<p>Use of pesticide is minimized and part of the IPM programme. To reduce chemical use the following is implemented in Genting Tenegang group estates:                      a) Planting of beneficial plant                      b) Barn Owls</p> <p>Documented IPM is found in the Oil Palm Manual under 'Pest and disease' (revision June 2013) OPM 5. It identified the pest such as :                      a) bagworms                      b) nettle caterpillars                      c) Grasshopper                      d) Rhinoceros beetles                      e) Bunch moth                      f) Vertebrates such as rats                      g) Pest &amp; Diseases in nursery                      h) Ganoderma</p> <p>There is no prophylactic use of pesticides at Genting Tenegang group estates.</p>	<p>Complied</p>
<p>4.6.4 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances.                      - Minor compliance -</p>	<p>Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class II, III &amp; IV chemical used at visited estate.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance								
4.6.5	<p>Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).</p> <p>- Major compliance -</p>	<p>Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment and application equipment provided to the operators. Example of PPE provided for specific work units:</p> <table border="1"> <thead> <tr> <th>Activity/work unit</th> <th>PPE recommendation</th> </tr> </thead> <tbody> <tr> <td>Spraying</td> <td>3M Respirator with filter element Rubber nitrile gloves Chemical goggles Body apron</td> </tr> <tr> <td>Manuring/fertilizer</td> <td>Dust mask 3M 9010 N95 Rubber/cotton gloves</td> </tr> <tr> <td>Workshop</td> <td>Ventilation fan/ Natural ventilation Dusk mask 3M 9010 N95 Safety boots Welding gloves</td> </tr> </tbody> </table> <p>All precautions attached to the products explained to operators and understood by them.</p>	Activity/work unit	PPE recommendation	Spraying	3M Respirator with filter element Rubber nitrile gloves Chemical goggles Body apron	Manuring/fertilizer	Dust mask 3M 9010 N95 Rubber/cotton gloves	Workshop	Ventilation fan/ Natural ventilation Dusk mask 3M 9010 N95 Safety boots Welding gloves	Complied
Activity/work unit	PPE recommendation										
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Workshop	Ventilation fan/ Natural ventilation Dusk mask 3M 9010 N95 Safety boots Welding gloves										
4.6.6	<p>Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3).</p> <p>- Major compliance -</p>	<p>The mill and estates comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation. Containers are triple rinsed and punctured before collection by registered agent. Safety Data Sheet also made available for all the pesticides during onsite audit.</p>	Complied								

Criterion / Indicator		Assessment Findings	Compliance
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sustainability Management Procedure Manual, SMP-GPB-28, rev:4 dated 3 July 2018. The implementation in the field is consistent with the established procedure. For weeding activities, knapsack spray pump and low volume CDA spray are used for selective spraying. Mono spray is used for circle spraying.	Complied
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No aerial spray at both visited estates.	Complied
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	No associated smallholders at Genting Tenegang Group estates. Employees demonstrate knowledge and skills on pesticide handling. MSDS/SDS was displayed in local Bahasa Malaysia language at the agrochemical store for each chemical stored as well as the use of safety pictorial poster for the easy understanding of the agrochemical handlers.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	Proper waste disposal according to procedures were sighted. Annually training is conducted to raise awareness of proper waste disposal to workers as well as to the estate personnel. E.g. at POM, training for waste handling done on 11/11/18 for workers and managers.  Wastes are identified e.g. domestic waste, scheduled waste, recyclable waste and empty chemical containers. Estates have designated areas to store litter and waste, which do not create a safety or health hazard. The domestic wastes were disposed at designated landfill in the estate.	Complied
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	<u>Genting Tanjung Estate:</u> Medical Surveillance carried out on 21/04/2018 for 56 workers by DOSH Registered Doctor (Reg ref: HQ /12/DOC/00/259). The medical surveillance report sampled reviewed is within the acceptable test results.  <u>Genting Landworthy Estate:</u> Medical Surveillance carried out on 21/04/2018 for pesticide workers by DOSH Registered Doctor (Reg ref: HQ /12/DOC/00/259). The medical surveillance report sampled reviewed is within the acceptable test results.	Complied
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	The monthly check-up including pregnancy test was conducted by HA. Sampled the monthly test report for Oct-18 at Genting Tanjung Estate & Genting Landworthy estate. No pregnant women or breast-feeding women noticed working with pesticide handling activities.	Complied
<b>Criterion 4.7:</b> An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			

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<p>4.7.1</p> <p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.</p> <p>- Major compliance -</p>	<p>The Occupational Safety And Health Policy was established, signed by President &amp; Chief Operating Officer on 1/07/2018. The communication between employer and employees can be seen through briefing during morning muster and displayed the policy on the notice board. The safety and health management plan 2018 was established and prepared by Mill Engineer and approved by Mill Manager. All the activities were included in this Safety and Health Management plan.</p> <p>At Genting Tanjung POM, CHRA was conducted on 11/5/2015 by Competent Person #JKKPHIE 127/171-2(160)) from ENVOSHA Sdn Bhd. All the recommendations by assessor were included in the CHRA action plan. This plan was reviewed by Mill Manager on monthly basis.</p> <p>At Genting Tanjung Estate, CHRA was conducted on 23/06/2014 by QMSPRO Training and Consultancy, Competent Person Reg. No. (JKKP IH 127/171-2(154)). All the recommendations by assessor were included in the CHRA action plan. This plan was reviewed accordingly by the Estate Manager.</p> <p>At Genting Landworthy Estate:            CHRA was conducted on 23/06/2014 by QMSPRO Training and Consultancy, Competent Person Reg. No. (JKKP IH 127/171-2(154)). All the recommendations by assessor were included in the CHRA action plan. This plan was reviewed accordingly by the Estate Manager.</p>	<p>Complied</p>

<p>4.7.2</p>	<p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.          - Major compliance -</p>	<p>The Hazard Identification, Risk Assessment and Control Procedure was established and maintained. All the activities were register in the HIRARC register form. HIRARC was reviewed on annually basis or if there is any significant change including occurrence of incident. The latest reviewed was carried out on 6/10/2018 at Genting Tanjung POM, 8/2/2018 at Genting Tanjung Estate. At Genting Tanjung POM, HIRARC sampled the Sterilizer station, Loading ramp operations, Air compressor, Bio-polishing plant, EFB plant, Weighbridge, Security, FFB Grading.</p> <p><u>Genting Tanjung Estate:</u>          Among the HIRARC carried out covered activities like chemical mixing and spraying, chemical storage, harvesting and FFB collection and vehicle maintenance. The HIRARC for Genting Tanjung Estate was reviewed overall on 6/10/2018. Existing HIRADC has been also reviewed and maintained accordingly with changes will be done if there is a new process/any accident occurred. Verified that the HIRADC has been revised accordingly for Harvesting process due to 1 accident reported dated 22/1/18 on the Adjusting pole length and clipping.</p> <p><u>Genting Landworthy Estate:</u>          Among the HIRARC carried out covered activities like diesel store, workshop, chemical mixing and spraying, chemical storage, harvesting and FFB collection and vehicle maintenance. The HIRARC for Genting Landworthy Estate was reviewed overall on 8/2/2018.</p> <p>Health Surveillance Programme:          Genting Tanjung POM - Medical Surveillance carried out on 15/10/2017 by (OHD Reg ref: HQ /10/DOC/00/167) from Dab Oh Sdn Bhd. Test result (for Hexane) shown all workers fit for work.</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>Current Medical Surveillance for year 2018 done on 24/10/18 and pending official report from the laboratory.</p> <p>Audiometric Test:                      The audiometric test was conducted on 13/11/2017, by (OHD Reg ref: HQ /10/DOC/00/167) from Dab Oh Sdn Bhd. Based on the result, 1 worker had mild to moderate hearing impairment, those JKKP 7 was sent to DOSH accordingly by OHD on 11/12/2017.</p>	

<p>4.7.3</p>	<p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -</p>	<p>Comprehensive Safety Related training was provided to the workers. The following trainings were reviewed :</p> <p>a) Genting Tanjung POM: First Aid Kit Training dated 24/10/18, Fire Drill Training dated 9/10/18, PPE Training dated 15/8/18 and Waste Spillage Control Training dated 8/8/18, CPO Spillage Control dated 22/5/18 &amp; Usage of Bearing Heater dated 27/7/18.</p> <p>b) Genting Tanjung Estate: Fire Extinguisher Handling Training dated 28/9/18, Fire Drill Training dated 19/2/18, First Aid Training dated 6/3/18, HSE Policy Training 18/1/18, Loose Fruit Collection Training dated 7/11/18, Manuring Training dated 18/10/18, and Spraying dated 1/11/18.</p> <p>c) Genting Landworthy Estate: PPE for Sprayers dated 8/6/18, Mixing of Pesticide dated 16/10/18, Understanding of Safety Data Sheet, Fire Drill Training dated 23/8/18 &amp; First Aid Training dated 14/9/18.</p> <p>Evaluation carried out on each training programme to determine its effectiveness. The training content was revised periodically for improvement. The safety and health training on exposure to noise levels conducted by the qualified person complied with the requirements of the Factories and Machinery (Noise Exposure) Regulations. All staff and mill employees attended the training as indicated in the records maintained. The content of the training include the said provisions of the regulations, purpose and explanation of audiometric test, proper usage of ear plugs and ear mufflers, and consequence of hearing loss. Appropriate PPE had been provided to all workers at the place of work to cover all potentially hazardous operations. There are warning signs to use PPE (this includes helmet, safety boots, ear plugs, ear mufflers, etc.)</p>	<p>Minor nonconformance</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>displayed at appropriate work areas for the protection of safety and health.</p> <p>PPE compliance and its monitoring effectiveness was not fully adequate. During the Genting Landworthy Estate site visit on spraying activities, noticed that the PPE compliance for some workers on the respirator mask filters were not fully adequate.</p>	

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>- Major compliance -</p>	<p>At Genting Tanjung POM, the Safety and Health Committee organization chart was established and available, dated 12/11/2018. Quarterly Safety &amp; Health Committee meeting accordingly and chaired by Mill Manager, discussion on the all relevant Health &amp; Safety matters were done accordingly. Seen the HSE Meeting Minutes: 18/09/2018, 07/06/2018, 5/03/2018 (verified held accordingly every 3 months once). DOSH visit log book sighted visit report dated 2/8/18.</p> <p>At Genting Tanjung Estate, the Safety and Health Committee organization chart was established and available, dated 29/3/2018. Quarterly Safety &amp; Health Committee meeting accordingly and chaired by Estate Manager, discussion on the all relevant Health &amp; Safety matters were done accordingly. Seen the HSE Meeting Minutes: 26/09/2018, 26/06/2018, 15/03/2018 (verified held accordingly every 3 months once). DOSH visit log book sighted visit report dated 2/8/18.</p> <p>At Genting Landworthy Estate, the Safety and Health Committee organization chart was established and available for year 2018. Quarterly Safety &amp; Health Committee meeting accordingly and chaired by Estate Manager, discussion on the all relevant Health &amp; Safety matters were done accordingly. Seen the HSE Meeting Minutes: 12/10/2018, 6/07/2018, 6/04/2018 (verified held accordingly every 3 months once). DOSH visit log book sighted with last visit report dated 9/8/16. No further visit by DOSH since 2016.</p>	<p>Complied</p>

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<p>4.7.5</p>	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p> <p>Accident and emergency procedures had been written and briefed to staff, workers, contractors and visitors. Workers trained in First Aid were present in the mill and field operations. Records on all accidents had been verified to be maintained satisfactorily. Quarterly review on accident cases had been carried out during quarterly meeting of Safety &amp; Health (OSH).</p> <p>Fire Drill training &amp; first aid been conducted on yearly basis and covering all workers. Seen the fire drill reports &amp; first aid training records at:</p> <p>a) POM: Fire Drill done on 18/10/18. First Aid Training done by trained first aider on 24/10/18 and participated by workers and staff.</p> <p>b) Genting Tanjung Estate: Fire Extinguisher Handling Training dated 28/9/18, Fire Drill Training dated 19/2/18, First Aid Training dated 6/3/18</p> <p>c) Genting Landworthy Estate: Fire Drill Training dated 23/8/18 &amp; First Aid Training dated 14/9/18.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.7.6	All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -	<p>Medical care and accident insurance is provided to all the employees. Local workers are covered under SOCSO scheme while foreign workers are covered under foreign workers compensation scheme. Seen the foreign workers compensation scheme at mill/estates as follows:</p> <p>a) POM: LONPAC Insurance Bhd, Policy No. (S/18/WF00/013719/SDK-66), period of insurance : 1/1/18 - 31/12/18 for 102 workers.</p> <p>b) Genting Tanjung Estate: LONPAC Insurance Bhd, Policy No. (J/18/WF00/013728/SDK-0 A), period of insurance : 11/10/18 - 31/12/18 for 51 workers.</p> <p>c) Genting Landworthy Estate: LONPAC Insurance Bhd, Policy No. (S/18/WF00/013729/SDK-001-66), period of insurance : 17/5/17 - 31/12/18</p>	Complied

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4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	Records on Lost Time Accident (LTA) metrics at mill/estates had been verified to be in satisfactory trending. JKPP 8 been submitted to DOSH annually as follows:  POM: JKPP 8 submitted for year ending 2017 to DOSH on 5/1/18. For year 2018, as to date 2 incidents occurred leading to LTI. Verified that for both 2 incidents, the JKPP 6 and necessary root cause investigation, correction, corrective action, HIRADC review and necessary trainings for workers been conducted accordingly. Genting Tanjung Estate: JKPP 8 submitted for year ending 2017 to DOSH on 15/1/18. For year 2018, as to date 2 incidents without LTI occurred. Verified that for both 2 incidents, the necessary root cause investigation, correction, corrective action, HIRADC review and necessary trainings for workers been conducted accordingly. Genting Landworthy Estate: JKPP 8 submitted for year ending 2018 to DOSH on 30/1/18. For year 2018, as to date 1 incidents occurred leading to LTI. Verified that the JKPP 6 been submitted accordingly.	Complied
<b>Criterion 4.8:</b> All staff, workers, smallholders and contract workers are appropriately trained.			
4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -	Formal training program for the year 2018 available and implemented. Regular assessment of training conducted to ensure understanding among the employees. Trainings conducted include a formal training programme on all aspects of RSPO Principles and Criteria and the Supply Chain Certification System. The various trainings conducted and the training records maintained to be acceptable.	Complied
4.8.2	Records of training for each employee shall be maintained. - Minor compliance -	Records of training for each employee are available & maintained accordingly in Mill and estates. Cross refer 4.7.3.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
<p><b>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</b></p>			
<p><b>Criterion 5.1:</b>            Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>			
<p>5.1.1</p>	<p>An environmental impact assessment (EIA) shall be documented.            - Major compliance -</p>	<p>POM and Estates carried out the annual review of environmental impacts in term of Environmental Impact Evaluation. The last review was conducted in 30/6/18 at POM on water quality and water availability, contamination of oil and water and air pollution. The assessment covered different area and process in the mill such as FFB reception, loading ramp &amp; marshalling yard, sterilizer and etc.            Genting Tanjung Estate: Environment Protection Department EIA Approval Letter Ref. No. JPAS/PP/17/600-1/11/1/86(61) dated 12/5/10 &amp; Environment Protection Department EIA Approval Letter Ref. No. JPAS/PP/17/600-1/11/1/257(31) dated 9/3/17 available for the proposed replanting of oil palm plantation at Genting Tanjung Estate, Kinabatangan District, Sabah were available. The proposed replanting project covers an area of approx. 1969.7 hectares &amp; 1,885 Ha respectively. "Surat Akujanji" dated 12/05/2010 &amp; 9/3/17 signed between Genting Plantations Berhad and "Jabatan Perlindungan Alam Sekitar" were available. Sighted also the "Perjanjian Syarat-syarat Alam Sekitar" ref: JPAS/PP/06/600-1/11/1/86 dated 21/04/2010.</p> <p><u>Genting Landworthy Estate:</u>            Environmental Impact Assessment for Proposed Replanting of 3,707.23 Ha of Oil Palm Plantation at Genting Landworthy Estate in Kinabatangan District, Sabah. Final Report Ref. No. CK/EV403-4329/17, June-18. Environmental Aspect &amp; Impact Evaluation was done on 16/10/18.</p>	<p>Complied</p>



Criterion / Indicator		Assessment Findings	Compliance
5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -	The continuous implementation of the improvements activities were checked during the field and document audit. The environmental management plan has been established to monitor the identified significant activities that give impacts on environment. A specific staff and executive have been appointed to do the monitoring to ensure the plan is effectively implemented.	Complied

<p>5.1.3</p>	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. - Minor compliance -</p>	<p>An environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. Continuous awareness training programme has been carried out by the company to its workers and other stakeholders. Monitoring plan was established based on DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD, stack monitoring and boiler stack sampling.</p> <ul style="list-style-type: none"> <li>a. Stack emission monitoring report# MS/GTOM/2018/Boiler No.2 (S2) -1st Half date 20/7/18, Result for Boiler no. 2 (S2) are within permissible limit.</li> <li>b. Sampled effluent monitoring records: Monthly Effluent Analysis Test Report no. GTOM/LAB/18/0110 dated 19/10/2018 done by KDC Laboratory; parameter monitored: pH, BOD, COD, TS, SS, TN, AN, O&amp;G. Samples were taken from each point of treatment in the system consist of raw pond, acid ponds, digester tanks and final pond before field application. BOD limit for final discharge &lt;20mg/L were met as well as all parameters that were within allowable limit.</li> <li>c. Consignment note no. 2018052906E2V7YP dated 18/5/18 for SW 305 and Consignment note no. 201805300065NU93B dated 30/5/18 for SW 323.</li> </ul> <p><u>Genting Tanjung Estate:</u> Environmental monitoring &amp; compliance audit report (1<sup>st</sup> report of year 2018) AEC ref no: JPAS/PP/17/600-1/11/1/86, report no: CK/MO411/727-1/18, report no: 13, dated 1/4/2018 by Chemsain Konsultant Sdn Bhd were available.</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>Project name: Replanting of 1,885 Ha Oil Palm Plantation at Genting Tanjung Estate, Kinabatangan Districts, Sabah. Monitoring period: February – May 2018 Date of monitoring Compliance Audit visit: 21/2/18, Water Quality Sampling: 21/2/18, EIA Consultant: Chemsain Konsultant Sdn Bhd.</p> <p>Genting Landworthy Estate:</p> <p>a. Environmental Impact Assessment for Proposed Replanting of 3,707.23 Ha of Oil Palm Plantation at Genting Landworthy Estate in Kinabatangan District, Sabah. Final Report Ref. No. CK/EV403-4329/17, June-18.</p> <p>b. River Water Sampling Certificate of Analysis Report dated 3/10/18. Result is satisfactory.</p>	
<p><b>Criterion 5.2:</b>            The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p>		

Criterion / Indicator	Assessment Findings	Compliance
5.2.1 Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance -	The inventory of the HCV sites was conducted in FY2010 by Dr Yap Son Kheong which covered all the Sabah region estates of Genting Plantations. Based on the findings of the assessment, the management and monitoring plan for HCV areas report dated 10th October 2014; High Conservation Value (HCV) areas have been identified such as forested area, river buffer zone, steep terrain, wildlife sanctuary in Genting Tenegang Group Estate.  <u>Genting Tanjung Estate</u> HCV 1.1, 1.2, 1.3, 1.4 Protection area – presence of Orang Utan and nesting site for Orang Utan at residual forest at Bukit Garib named Baha Sanctuary. <u>Genting Landworthy Estate</u> HCV 4.2 present in the estate tributaries of Kinabatangan river. Establishment of appropriate riparian buffer belt in accordance with Sabah Water Resources Enactment 1998.	Complied
5.2.2 Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	Regular patrols within the operating unit estates were carried out and findings recorded by the respective Estate executives to monitor the Conservation / buffer zone areas. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented. Management and monitoring plan for HCV areas dated 13/2/18 was made available at Genting Tanjung Estate. Monthly sighting records were verified at both estates.	Complied
5.2.3 There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	The program to regularly educate the workforce and community about the status of these RTE species are also established with on-going consultation with the relevant authorities at the Kinabatangan District. There is evidence of commitment to discourage any illegal or inappropriate hunting, fishing or collecting activities via the signage erected around the affected areas which prohibit such activities. In 2017, awareness was given to workers on 7/10/18 with regards to Buffer Zone training.	Complied

Criterion / Indicator	Assessment Findings	Compliance
5.2.4 Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> <li>• The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>• Outcomes of monitoring shall be fed back into the management plan.</li> </ul> - Minor compliance -	<p>The management of the individual estates has taken action to discourage any illegal or inappropriate hunting, fishing or collecting activities. During site visit, 'no hunting' signs has erected at the different strategic location at Genting Tanjung and Landworthy Estate. Awareness training/meeting to the workers and local communities to discourage hunting and disturbance to the natural areas has been carried out at both estate. Monthly monitoring at the HCV area checklist (dated 2 November 2017) make available during onsite visit.</p> <p>Site verification to the HCV area of within Genting Tanjung and Landworthy Estate confirmed that all signage at conservation areas are well maintain. No activities had carried out in that area. Stakeholders being informed about the HCV assessment and monitoring result through meeting.</p>	<p>Complied</p>
5.2.5 Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	<p>There was no HCV set-aside that needs any negotiation process with the local communities</p>	<p>Complied</p>
<p><b>Criterion 5.3:</b>            Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p>		

Criterion / Indicator		Assessment Findings	Compliance
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	<p>Visits made to Mill together with Genting Tanjung Estate and Genting Lanworthy Estate showed that all waste products and sources of pollution were identified and documented. The documentation and identification of all the waste products such as scheduled waste, domestic waste and recyclable waste such as metal, plastic, mill waste and polluting materials e.g. EFB, POME, Stack emissions and Boiler ashes were maintained and monitored at the Mill. At the estates Scheduled Waste identified included spent hydraulic oil (SW 305), spent lubricant oil (SW306), used chemical containers/drums (SW 409), used battery (SW102) and used filters SW 410). Records on the usage and disposal e.g. inventory and consignment notes were well recorded and documented.</p> <p>E.g. Consignment note no. 2018052906E2V7YP dated 18/5/18 for SW 305 and Consignment note no. 201805300065NU93B dated 30/5/18 for SW 323 at POM, consignment note no. 2018062116WHURS3 dated 21/6/18 for SW 404 &amp; Consignment note no. 20180626121CZJWT dated 26/6/18 for SW 404 &amp; Consignment note no.2018062609LQFGPR for SW 410 at Genting Landworthy Estate. Appropriate secondary containment with necessary spill kits for the diesel skid tanks, chemical and scheduled waste storage areas was adequately maintained.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
5.3.2 All chemicals and their containers shall be disposed of responsibly. - Major compliance -	The disposal of used chemicals and containers were done in accordance with their schedule on waste management as planned. Stores for scheduled waste were inspected at audited sites i.e. Mill and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. The mill and estates also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor e.g. at POM & Estates by Legenda Bumimas Sdn Bhd.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>5.3.3</p> <p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.                      - Minor compliance -</p>	<p>Segregation of wastes i.e. general wastes and scheduled wastes including clinical waste was verified to be satisfactory in the mill/estates. Proper storage areas were identified for the storage of the recyclable wastes at the estates and mill with adequate pollution control methods been implemented e.g. disposal of non-scheduled waste (empty chemical container). Sampled at:</p> <ul style="list-style-type: none"> <li>a) POM: Consignment note no. 2018052906E2V7YP dated 18/5/18 for SW 305 and Consignment note no. 201805300065NU93B dated 30/5/18 for SW 323. Verified that the disposal done thru DOE licensed schedule waste collector - Legenda Bumimas Sdn Bhd. The waste inventory record i.e. 5th schedule for identified schedule wastes has been maintained accordingly.</li> <li>b) Genting Tanjung Estate: consignment note no. 2018062116WHURS3 dated 21/6/18 for SW 404 &amp; Consignment note no.2018051815T46POS for SW 305. Verified that the disposal done thru DOE licensed schedule waste collector - Legenda Bumimas Sdn Bhd. The waste inventory record i.e. 5th schedule for identified schedule wastes has been maintained accordingly.</li> <li>c) Genting Landworthy Estate: Consignment note no. 20180626121CZJWT dated 26/6/18 for SW 404 &amp; Consignment note no.2018062609LQFGPR for SW 410. Verified that the disposal done thru DOE licensed schedule waste collector - Legenda Bumimas Sdn Bhd. The waste inventory record i.e. 5th schedule for identified schedule wastes has been maintained accordingly.</li> </ul>	<p>Complied</p>
<p><b>Criterion 5.4:</b>                      Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		



Criterion / Indicator		Assessment Findings	Compliance
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	<p>Plan for improving efficiency of the use of fossil fuels and to optimise renewable energy in place and monitored accordingly. E.g.</p> <p>1. Diesel consumption/FFB processed: 0.48 l/tonne (October 2018).</p> <p>2. Renewable energy use (fibre): 29.15kWh/mt FFB (October 2017).</p> <p>The plan was monitored by Mill Engineer on monthly basis.</p> <p>At Genting Tanjungs Estate, there was a plan established for improving efficiency of the use of fossil fuel. Sighted the diesel consumption 2015 – 2018 (as at October 2018). Diesel consumption/FFB processed: 4.27 l/mt (Oct 2018).</p> <p>Sighted the Genting Landworthy Estate diesel consumption 2015 – 2018 (as at October 2018). Diesel consumption/FFB processed: 4.41 l/mt (Jan - Oct 2018).</p>	Complied
<p><b>Criterion 5.5:</b> Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>			

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5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	No burning policy is available and signed by Mr Yong Chee Kong (President & Chief Operating Officer) dated 10 Aug 2011 and no evidence of open burning was observed during onsite visit to the line site as well as the areas surrounding the office.  Prohibition use of fire during land preparation stage detailed out under generic agreement for land preparation. As stipulated in the contract; Para 2.3 – compliance with RSPO/MSPO/ISCC requirements related company policies (iv) Zero Burning Policy under Schedule 2; scope of works/work order guidelines. No use of fire for land preparation during replanting and verified during site review at Genting Tanjung Estate.	Complied
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	No use of fire for land preparation during replanting and verified during site review at Genting Tanjung Estate.	Complied
<b>Criterion 5.6:</b>			
Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	The operating units had reviewed the environmental impact assessment on potential pollution to water, gaseous emissions to air and contamination on land. At Mill, monitoring of mill gas emissions is being done online using the Continuous Emissions Monitoring System (CEMS) and supported by the Ringelman Smoke Chart. Stack monitoring report available with latest stack emission monitoring report# MS/GTOM/2018/Boiler No.2 (S2) -1 <sup>st</sup> Half date 20/7/18. POME treatment, monitoring and land application is monitored, maintained and adhered to DOE regulations i.e. BOD below 20mg/l.	Complied

Criterion / Indicator		Assessment Findings	Compliance
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Significant pollutants and greenhouse gas (GHG) emissions were identified includes methane from effluent, smoke and fertilizer usage have been adequately documented. It was noted that the sustainability team have established plans for implementation and monitoring of GHG emissions.	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	Tools and systems used to monitor significant pollutants includes the DOE CEMS monitoring system for air emissions, water quality at discharge points as per DOE regulations. POME is treated using anaerobic and aerobic ponds or biological treatment system.	Complied
<b>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</b>			
<b>Criterion 6.1:</b> Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Sustainability Department has carried out Social Impact Assessment (SIA) and Human Rights Impact Assessment (HRIM) on 10-12/10/2018 for Genting Tanjung Oil Mill and 17-19/10/2018 in Genting Tanjung Estate The assessment was carried out according to the RSPO P&C which covered transparency, environmental, social and OSH. Interviewed with the stakeholders such as local and foreign workers' representatives, contractors, FFB suppliers and government authorities was conducted. The areas that covered during the interview were such as channel of communication, safety & health, environment issues, pay and condition, boundary, corporate social responsibility and work force basic amenities. Human rights, child labour, working hours and freedom of association were covered during the interviewed with workers. Issues raised during the assessment were recorded in the assessment report.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Seen the List of Respondents that have been involved in the assessment such as FFB suppliers, internal workers, contractors and government authorities.	Complied
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	Social Management and Monitoring Plan was developed by the Head Office of Sustainability Department. The plan was incorporated with standard social aspect only such as Social Impact Assessment, Internal Stakeholder Consultation and Communication Meeting and List of Stakeholders.  Action Plan for the positive and negative issues raised during the SIA was developed with mitigation and promotion action in Genting Tanjung Estate. Person in charge with time frame was indicated in the action plan. For eg: Officer from <i>Jabatan Perkhidmatan Haiwan dan Perusahaan Ternak</i> has commented that the cattle integration project launched by the estate was in good condition. The management is continuing with the current operation as directed by the officer.	Complied
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The generic Social Management and Monitoring Plan was developed and reviewed on yearly basis and the last review was conducted on 30/10/2018 in Genting Tanjung Oil Mill and 5/11/2018 in Genting Tanjung Estate.  The action plan developed in Genting Tanjung Estate for SIA findings was reviewed on 31/10/2018.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	There was no scheme smallholder involved in the certification unit.	Not applicable

Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 6.2:</b> There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	<p>Consultation and communication procedures shall be documented.</p> <p>- Major compliance -</p>	<p>Genting Plantations Berhad has developed Procedure for Consultation and Communication, Doc. No. SMP-GPB-17 dated 23/2/2018 where the objective of the procedure is for the effective internal and external communication of sustainability requirements and responding to the communication from local communities and other affected parties. The consultation and communication meeting will involve all internal and external stakeholders and carried out in an open and transparent manner. The communication methods are such as meeting, complaint &amp; suggestion box, email, call and complaint &amp; grievance book. All the issues and grievances are handled by the Manager except the issues beyond jurisdiction of Manager, then the issues will be forwarded to Head Office.</p> <p>Interviewed with the female workers who worked on night shift in GTOM and seen the meeting minutes for Gender Committee dated 14/8/2018 found that the workers were asking about the night shift allowance and the Chairman of the committee informed that allowance has agreed as per the memo dated 24/11/2017 issued by top management. Interviewed with the management confirmed that they had only paid 3 months of allowance to the female workers on December 2017, January 2018 and February 2018 and stopped paying the allowance on March 2018 due to they obtained approval from JTK Sabah for exclusion to comply with the terms stated in the permit obtain earlier. However, the workers are not aware that night shift allowance has been stopped for female workers and no evidence to show that management has communicated the issue to the workers.</p>	<p>Major nonconformance</p>

Criterion / Indicator		Assessment Findings	Compliance
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	The Senior Mill Manager has been appointed by Vice President of Sabah as the Social Officer to handle ISCC, RSPO and MSPO related matters including social issues. Appointment letter dated 24/10/2017 was sighted.	Complied
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	Genting Tanjung Oil Mill and Genting Tanjung Estate has reviewed and updated the stakeholder list on October 2018. The stakeholder list has included government authorities, FFB suppliers, contractors and NGOs. There were two external stakeholder meetings conducted on 15/10/2018 and 22/10/2018 which involved the participation of stakeholders such as government authorities, contractors and suppliers for the Genting Tanjung Complex. Meeting minutes were sighted and issues were recorded in the meeting minutes. Internal Stakeholder meeting was conducted on 1/11/2018 for Genting Tenegang Group which involved Genting Tanjung Complex, contractors and internal workers. Issues were reported during the meeting by the stakeholders and immediate responses were provided by the management. For eg: Workers have requested the management to take action on the stray dogs issue in the housing complex. The management has submitted letter to Local Council regarding the issue on 25/10/2018 and waiting for response by the authority.	Complied
<b>Criterion 6.3:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			

Criterion / Indicator		Assessment Findings	Compliance
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	Genting Plantations Berhad has developed and implemented Complaints and Grievances procedure, Doc. No. SMP-GPB-19 dated 21/3/2018 where the objective of the procedure is to provide guidelines on handling complaints and grievances raised by any stakeholders. Written complaints can be delivered to management anonymously by post, email or SMS or via the complaint and suggestion box located at the muster ground and office. All written confidential complaints will be dealt with confidentially by Manager and filed securely under Private and Confidential. Time frame for action to be taken depends on the severity of the complaints. The accepted time frame to acknowledge and respond to complaints is within 1 month upon receipt.	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	Genting Plantations Berhad has implemented Complaints/ Grievances Record Book to record any of the complaints lodged by stakeholders. Besides, Enquiry Register Book was implemented as well in the company. Most of the complaints lodged in the complaint book were regarding the inspection/ visit by authorities. All the issues were solved with evidences attached in the complaint books. Interview with the workers and contractors confirmed that they are aware of the complaint procedure.  Sampled of complaint lodged in Genting Tanjung Estate as below: Issue: Worker from Block Y has lodged complaint on 26/9/2018 regarding the main switch in the house was burnt.  Action: The management has ordered insulated splitter double pole 3way on 27/9/2018 as recorded in Direct Charges Book and items have been delivered. Seen the invoice# IN1810089 dated 12/10/2018 for the item purchased and repair has been carried out. The complainant has acknowledged on the action taken.	Complied

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 6.4:</b> Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	Genting Plantations Berhad has developed Procedure on Conflict Resolution and Handling of Negotiations and Compensation within GENP Estates, Doc. No. SMO-GPB-18 dated 29/12/2017. The procedure is to provide guidelines on handling the land issues/ boundary conflicts. Initial negotiation shall be carried out by affected estate's management and the affected stakeholders. If negotiation fails, the issue will have forwarded to Legal Department and other relevant department in Head Office. Re-survey will be carried out by license surveyor for confirmation of boundary and compensation will make accordingly.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	SOP as per indicator 6.4.1.	Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	The estates and mill is surrounded by own estates and neighbouring plantations. Through interviewed with the neighbouring plantations confirmed that no encroachment of land reported by the company. Electrical fencing was installed to demarcate the boundary.	Complied



Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 6.5:</b> Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			
6.5.1	Documentation of pay and conditions shall be available. - Major compliance -	<p>Mill and estates have employed local and foreign workers. All the mill and estates workers are under direct employment. The payslip has included basic pay, allowances, working days, deduction of salary and overtime. Payslip for November 2017, July 2018 and October 2018 was sampled based on the crop summary as below:</p> <ul style="list-style-type: none"> <li>a. Employee No.: E00068 (GTOM)</li> <li>b. Employee No.: E00127 (GTOM)</li> <li>c. Employee No.: E00082 (GTOM)</li> <li>d. Employee No.: E00160 (GTOM)</li> <li>e. Employee No.: E00265 (GTOM)</li> <li>f. Employee No.: E02589 (GTJE)</li> <li>g. Employee No.: E2483 (GTJE)</li> <li>h. Employee No.: E02249 (GTJE)</li> <li>i. Employee No.: E02641 (GTJE)</li> <li>j. Employee No.: E00103 (GLWE)</li> <li>k. Employee No.: E01843 (GLWE)</li> <li>l. Employee No.: E02379 (GLWE)</li> <li>m. Employee No.: E02484 (GLWE)</li> </ul> <p>All the sampled workers have achieved the Minimum Wage Order 2016 of RM 920/ month or RM 35.38/day.</p>	Complied

<b>Criterion / Indicator</b>	<b>Assessment Findings</b>	<b>Compliance</b>
<p>6.5.2</p> <p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p>	<p>Employment contracts/ extension contracts are available and explained in language that understood by workers. The contract was signed by the workers and sampled of contracts/ offer letters as below:</p> <ul style="list-style-type: none"> <li>n. Employee No.: E00068 (GTOM)</li> <li>o. Employee No.: E00103 (GTOM)</li> <li>p. Employee No.: E00160 (GTOM)</li> <li>q. Employee No.: E00253 (GTOM)</li> <li>r. Employee No.: E00265 (GTOM)</li> <li>s. Employee No.: E02589 (GTJE)</li> <li>t. Employee No.: E00110 (GTJE)</li> <li>u. Employee No.: E00086 (GTJE)</li> <li>v. Employee No.: E02641 (GTJE)</li> <li>w. Employee No.: E02484 (GLWE)</li> <li>x. Employee No.: E02379 (GLWE)</li> <li>y. Employee No.: E01346 (GLWE)</li> <li>z. Employee No.: E02268 (GLWE)</li> </ul> <p>Interviewed with the workers confirmed that they were understood on the terms and conditions outlined in the employment contract. They were also briefed on the terms and condition during induction training.</p>	<p>Complied</p>

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6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –	<p>Linesite inspection was carried out on weekly basis by Estate Hospital Assistant and verified by Senior Mill Manager in Genting Tanjung Oil Mill. The inspection was carried out by using Housing Inspection Form. The last inspection was carried out on 12/11/2018.</p> <p>Linesite inspection was carried out by Hospital Assistant on weekly basis and the last inspection was conducted on 10/11/2018 in Genting Tanjung Estate.</p> <p>Free medical assistant and HUMAN school was established and provided to the workers and the dependents. Basic welfare amenities such as community hall, free water and electricity supply was provided to the workers.</p>	Complied
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food. - Minor compliance –	Interviewed with the workers confirmed that they are easily access to adequate and affordable foods. There are sundry shops in the estates’ compound and price was displayed at the goods and foods.	Complied
<p><b>Criterion 6.6:</b>            The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	Genting Plantations Berhad has developed and implemented Social Policy dated 22/6/2015 where the company respects the rights of the employees and workers to join or form legal trade unions of their own choosing and to bargain collectively. The policy was in bilingual, Bahasa Malaysia and English. Training was provided to the workers on 13/1/2018. Interviewed with the workers confirmed that they were briefed by management and understood on the policy. Policy was displayed at the notice board outside the office.	Complied

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6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Workers' Welfare Committee was established in Genting Tanjung Oil Mill and Genting Tanjung Estate which formed by local and foreign workers' representatives where they were elected by the workers. Meeting was conducted on 14/8/2018 with total 7 participants. Issues were raised during the meeting and recorded in the meeting minutes. Sampled issue such as workers have requested to have grass cutting in housing complex. Evidence of grass cutting has been carried out on 30/8/2018 was sighted.  Meeting among the workers' representatives were carried out on 5/4/2018 in Genting Tanjung Estate with total 15 participants. No issue was reported during the meeting.	Complied
<b>Criterion 6.7:</b> Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Social Policy dated 22/6/2015 was established by the company. The company does not use any child labour in the plantations. They respect the children's rights. Interviewed with the workers confirmed that no children have been employed and work in the plantations. Document reviewed on the master list of employees confirmed that all the employees were above the age of 18.  However, site visit to crèche and interviewed with a teenager aged 14 years old in GLWE told that she is working in the field with her mother to collect loose fruit together with another friend who aged 12 years old. She was not feeling well during the visit and rested at crèche. Field visit to the Block 21 and interviewed with the mandore and mother of the teenager confirmed that there were two teenagers working in the field with them to collect loose fruits. During field visit also found that the teenager with age of 12 years old was working in the field.	Major nonconformance

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 6.8:</b> Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	Genting Plantations Berhad has implemented Social Policy dated 22/6/2015 where the company does not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation. The policy was briefed to the workers on 13/1/2018. Policy was displayed at the notice board outside the office.	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Verified the LintraMax system and payslips found that the company has recruited male and female workers, local and foreign workers. They were treated equally without any discrimination. They were paid according to legal requirements. Interviewed with the female and male workers confirmed that they were allowed to transfer to other work stations if they found they are unfit for the job. The workers were provided with standard treatment such as free medical treatment, fair overtime offered to all the workers whoever want to work and free housing to everyone.	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	Sampled the mandore's checkroll book and interviewed with the mandore in GLWE confirmed that 4 of the loose fruits collectors who do not possess passport and permit are working in the field and payment of wages was under the mandore's account (Employee No.: E00212). This occurred because the workers did not register in the company's system as they do not have legal documents. There was no proper documented recruitment procedure which lead to the hiring of undocumented workers.	Minor nonconformance
<b>Criterion 6.9:</b> There is no harassment or abuse in the work place, and reproductive rights are protected.			

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6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	Social Policy dated 22/6/2015 was developed by Genting Plantations Berhad where the company prohibits physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation. Besides, Sexual Harassment Policy dated 3/8/2009 was implemented where the company strive for a harassment-free environment. The policy was briefed to the workers on 13/1/2018. Policy was displayed at the notice board outside the office.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	The company has developed Social Policy dated 22/6/2015 to protect the reproductive rights of employees. The policy was briefed to the workers on 13/1/2018. Policy was displayed at the notice board outside the office.	Complied
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	Gender Committee was established in Genting Tanjung Oil Mill to monitor any issues related to sexual harassment or violence reported by the women in the compound. Last meeting was conducted on 14/8/2018. Issues related to welfare of women were raised and Chairman of the Committee has responded. Interview with the female workers confirmed that no sexual harassment reported.  Genting Plantations Berhad has developed Prevention and Eradication of Sexual Harassment in workplace guidance to explain the types of sexual harassment and procedure to handle if there is any case. The complainant shall have reported within 24 hours from the date of incident happened. If the problem could not be solved within 5 days, then the issue will be forwarded to HRAD for further investigation. All the reported cases will be handled confidentially. The identity of the complainant will not be disclosed and will be protected. Grievance/ Complaint Form for Sexual Harassment was implemented to record any issues related to sexual harassment.	Complied

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 6.10:</b> Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Genting Tanjung Oil Mill has received outsider FFB crops from smallholders. The price of FFB for past three months has been displayed at the notice board at weighbridge area. Pricing mechanism for FFB follows the MPOB price structure.	Complied
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	There were total 9 independent smallholders sending FFB crops to Genting Tanjung Oil Mill. The smallholders have been briefed on the External Fresh Fruit Bunch (FFB) Procurement Policy Agreement. The pricing formula has clearly stated in the agreement where the prices is adopted from MPOB reference price. The smallholders have signed on the attendance list for the briefing on 2/10/2017 and 5/10/2018.	Complied
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	Sampled of the contract agreement as below: a. Agreement No.: GTJE/TC/2018/05 for loading and transporting of FFB and loose fruits which valid from 1/1/2018 until 31/12/2018. b. Agreement No.: GTJE/TC/2018/03 for loading and transporting of FFB and loose fruits which valid from 1/1/2018 until 31/12/2018.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	<p>For the FFB suppliers, they will receive final payment in the following month by the 12<sup>th</sup> day for the FFB supplied in the preceding month based on the month-end price computed and a progress payment recommended by the respective mill manager.</p> <p>For other contractors, the company shall pay to the contractor the amount based on FFB loading and transportation rate for the loading and transporting works within 30 days from date the loading and transportation works is carried out.</p> <p>Sampled of the payment advices for FFB suppliers as below:</p> <ul style="list-style-type: none"> <li>a. Transaction Reference# 514369610100014 dated 12/10/2018 for FFB supplier</li> <li>b. Transaction Reference# 514369610100016 dated 12/10/2018 for FFB supplier</li> <li>c. INV# MFH/IV/18/C0010 dated 30/9/2018, Transaction Reference# 514402870100054 dated 17/10/2018</li> <li>d. INV# TSB/D4/18901 dated 30/9/2018, Transaction Reference# 514402870100027 dated 17/10/2018</li> </ul>	Complied
<b>Criterion 6.11:</b>			
Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	The estates and mill management has made contribution to the workers and local communities such as provide van to send the children to schools, festival celebration by given 1kg of meat to each of the workers, vaccination to the children in the compound, and rice incentives to the most productive' s harvesters. Besides, HUMANA was established in the compound in order for the children to access to education.	Complied



Criterion / Indicator		Assessment Findings	Compliance
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	There is no scheme smallholder involved in the certification unit.	Not applicable
<b>Criterion 6.12:</b> No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	<p>The company has recruited all the employees with legal identification for local and valid passport and work permit for foreign workers and contract workers. Contract of employment was signed by the workers prior to work. Sampled of foreign workers with valid work permit as below:</p> <ul style="list-style-type: none"> <li>a. Permit No.: PE 0668860 valid until 30/7/2019 (GTOM)</li> <li>b. Permit No.: PE 0668817 valid until 18/6/2019 (GTOM)</li> <li>c. Permit No.: PE 0072719 valid until 6/3/2019 (GTOM)</li> <li>d. Permit No.: PE 0666894 valid until 29/1/2019 (GTOM)</li> <li>e. Permit No.: PE 0072429 valid until 28/3/2019 (GTJE)</li> <li>f. Permit No.: PE 0072694 valid until 22/1/2019 (GTJE)</li> <li>g. Permit No.: PE 0668365 valid until 20/7/2019 (GLWE)</li> <li>h. Permit No.: PD 9607099 valid until 22/1/2019 (GLWE)</li> <li>i. Permit No.: PD 9141961 valid until 25/12/2018 (GLWE)</li> </ul> <p>Interviewed with the foreign workers confirmed that they have freedom to go out from the compound during off day. Some of them had kept their passport by their own and some of them had voluntarily to hand out their passport to keep by the management to avoid any loss of passport.</p>	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	Interviewed with the foreign workers from Indonesia and Philippines confirmed that no contract substitution has occurred. The terms and conditions stated in the agreement they signed in home country were the same as they signed in Genting Plantations Berhad.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Genting Plantations Berhad has developed Procedures for Social Management, Doc. No. SMP-GPB-32, Rev. 0, dated 18/1/2018. The procedure has clearly outlined the practices of the company such as no contract of substitution for the foreign workers, provide reasonable and safe living condition to all the employees, post arrival orientation will be provided to brief on terms and conditions, safety & health, national and state laws and regulations and no discrimination to all the workers. Induction training has been provided to new foreign workers in Genting Tanjung Estate on 27/9/2018 for 20 new workers arrived on 18/9/2018.	Complied
<b>Criterion 6.13:</b> Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	Genting Plantations Berhad has developed Social Policy dated 22/6/2015 where the company respect and support the Universal Declaration of Human Rights. The policy has been briefed to all the workers during induction training. Interviewed with the workers confirmed that they were respected by the company. The policy was displayed at the notice board in the office area.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	HUMANA was established in the estates to provide education opportunity to the Indonesian children staying in the compound. In Genting Tanjung Estate, the HUMANA teacher has requested transportation to send the students for sport competition on 7/3/2018 and the management has approved. The management has submitted fees to HUMANA Child Aid Society Sabah on monthly basis for total 65 students in GTJE and 32 students in GTOM. Interviewed with the HUMANA teachers confirmed that the management has provided assistance whenever they requested such as donation, upkeep and maintenance of building and transportation assistance.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<b>Principle 7: Responsible development of new plantings</b>		
<b>Genting Tanjung Oil Mill</b> Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance assessment. The immature areas are replanted area.		
<b>Principle 8: Commitment to continual improvement in key areas of activity</b>		
<b>Criterion 8.1:</b> Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.		

Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of pesticides(Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);               <ul style="list-style-type: none"> <li>• Optimising the yield of the supply base.</li> </ul> </li> </ul> <p>- Major compliance -</p>	<p>Significant actions plan taken amongst all of continual improvements sighted were as following:</p> <ul style="list-style-type: none"> <li>- Installation of Electrostatic Precipitation (ESP) system in mill boiler as part of programs for compliance against revised DOE EQA (Clean Air) Regulations 2014</li> <li>- 3M-CPD programs at mill.</li> </ul> <p>Action plan for continual improvement has been implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill. On-going monitoring of management plan was sighted for the following aspects:</p> <ul style="list-style-type: none"> <li>i) Reduction in use of pesticides – cattle grazing through integrated cattle management for the estate. For example, 600 ha of area has been allocated for the project at Genting Landworthy Estate. Additional of another 200 ha will be included in 2019.</li> <li>ii)Environmental impact/pollution and GHG emission – air pollution control system @ ESP for boiler no.2 and 3, dust/opacity monitoring system before June 2019 (compliance towards Clean Air Regulation 2014)</li> <li>iii)Waste Reduction – Continuous recycling programme through 3R campaign.</li> <li>iv) Social impact – gazetted budget for community hall, futsal and replacement of wooden house to concrete house in 2019.</li> <li>v) Optimising the yield of the supply base – gazetted budget for more efficient FFB evacuation through mechanization i.e superbull 4WD, grabber etc.</li> </ul>	<p>Complied</p>

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**Appendix B: Approved Time Bound Plan**

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	Status as of 1 Feb 2019	Any unresolved non-compliances		
1	Genting Plantations (WM) Sdn Bhd & Setiamas Sdn Bhd(100%)for estates  Genting Oil Mill Sdn Bhd (100%) for mill	Genting Sri Gading Estate,	Supply base for Genting Ayer Item Oil Mill, Johor, Malaysia	Dec,2014	Certified	None	
2		Genting Sungei Rayat Estate,					
3		Genting Kulai Besar Estate,					
4		Genting Tanah Merah Estate,	Genting Sepang Estate	Dec,2015	"Extension of Scope" audit due to merger with Genting Tanah Merah Estate.		
5		Genting Tebong Estate,		July, 2015			
		Genting Cheng Estate		Jan, 2020			"Extension of Scope" audit due to merger with Genting Tebong Estate
6	Genting Plantations (WM) Sdn Bhd (100%)for estates	Genting Selama Estate, Kedah, Malaysia		July,2015 To be re-certified in July 2019	Voluntary Suspension of the Certificate w.e.f 1 Sept 2017	Land title conversion in progress	
7	Genting SDC Sdn Bhd (100%)	Genting Sabapalm Estate, Sabah, Malaysia	Supply base for Genting Sabapalm Oil Mill, Sabah, Malaysia	Aug,2015	Certified	None	
8	Genting Tanjung Bahagia Sdn Bhd ( 100%) for estates	Genting Tanjung Estate, Sabah, Malaysia	Supply base for Genting Tanjung Oil Mill, Sabah, Malaysia	Aug,2016	Certified	None	
9		Genting Tenegang Estate, Sabah, Malaysia					
10		Genting Layang Estate, Sabah, Malaysia					
11		Genting Bahagia Estate,					
12	Landworthy Sdn Bhd (84%)	Genting Landworthy Estate, Sabah, Malaysia					
13	Genting Tanjung Bahagia Sdn	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah Oil Mill, Sabah, Malaysia	July 2019	Not yet certified	The Remediation and Compensation Procedures is pending for Genting Kencana Estate. LUCA has been	
14		Genting Permai Estate, Sabah, Malaysia					

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15	Bhd ( 100%) for estates	Genting Kencana Estate, Sabah, Malaysia				passed. Concept Note (CN) for Remediation and Compensation has been submitted to RSPO. CN being revised and to be re-submitted in 1Q2019.
16	Genting SDC Sdn Bhd ( 100%) for estate and mill	Genting Jambongan Estate, Sabah, Malaysia	Supply base for Genting Jambongan Oil Mill, Sabah, Malaysia	Sept 2019	Not yet certified	Concept Note and Remediation Plan has been submitted to RSPO. RSPO allowed for Genting Jambongan to proceed with its certification programme.
17	Genting Plantations Bhd Wawasan Land Progress Sdn Bhd (100%)	Genting Sekong Estate, Sabah, Malaysia	Supply base for Genting Trushidup Oil Mill, Sabah, Malaysia	Sept,2017	Certified	None
18	Asiaticom Sdn Bhd ( 100%) Sawit Sukau Usahasama Sdn Bhd(56%)	Genting Suan Lamba Estate, Sabah, Malaysia				
19	PT Sepanjang Intisurya Mulia (70%)	Mulia 1 & 2 Mulia 3 & 4 Mulia 5 & 6	Supply base for Mulia Oil Mill, Kalimantan, Indonesia	Oct, 2017	Certified	None
20	PT Sawit Mitra Abadi (70%)	Abadi 1 & 2 Abadi 3 & 4				
21	Genting Plantations Berhad (100%)	Genting Mewah Estate, Sabah, Malaysia	Supply base for Genting Mewah Oil Mill, Sabah, Malaysia	Mar,2017	Certified	None
22	Genting Plantations (WM) Sdn Bhd (100%)	Genting Bukit Sembilan Estate, Kedah, Malaysia		July,2017	Certified	None

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23	PT Globalindo Agung Lestari (60%)	Lamunti Barat Estate Lamunti Timur Estate I &II Mengkatip Estate I & II Bakuta Estate Plasma Timur & Barat	Supply base for Globalindo Oil Mill, Kalimantan, Indonesia	Oct,2023	Not yet certified	In process of obtaining HGU
24	PT United Agro Indonesia(60 %)	PT UAI 1 & 2 UAI Plasma		Oct, 2023		NPP for PT UAI in progress. HCV report being reviewed by HCVRN.In the process of obtaining HGU for UAI.
25	PT Susantri Permai (95%)	Puroh Estate Masaha Estate Zircon Hill Estate	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia	Oct, 2022	Not yet certified	In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		SP Plasma		Oct, 2023		
26	PT Kapuas Maju Jaya (95%)	Waterfall Estate I & II Muhun Estate I & II Talawang Estate I & II	Supply bases for Golden Hill Oil Mill, Kalimantan Indonesia	Oct,2022	Not yet certified	In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		KMJ Plasma		Oct, 2023		
27	PT Dwie Warna Karya ( 95%)	Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate		Oct , 2022	Not yet certified	In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		DWK Plasma		Oct, 2023		
28	PT Citra Sawit Cemerlang (70%)	CSC Estates	Supply base for CSC Oil Mill*	Oct,2021	Not yet certified	In process of obtaining HGU.
29	PT Surya Agro Palma (70%)	SAP Estate 1&2 SAP Estate 3&4 SAP Estate 5&6	Supply base for SAP Oil Mill*	Oct, 2020	Not yet certified	In process of obtaining HGU.
30	PT Agro Abadi Cemerlang (70%)	AAC 1 & 2 AAC 3 & 4				NPP In Progress. HCV report being reviewed by HCVRN.
31	PT Palma Agro Lestari Jaya (70%)	PALJ Estates	Supply base for PALJ Oil Mill*	Aug,2023	Not yet certified	NPP In Progress.
		PALJ Plasma				
32	Knowledge One Investment Pte Ltd (	KIU 1 & 2 KIU 3 & 4	Supply base for KIU Oil Mill	July, 2019	Not yet certified	NPP in progress. HCV report being reviewed by HCVRN.

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	Status as of 1 Feb 2019	Any unresolved non-compliances
	85%)-PT Kharisma Inti Usaha ( KIU)	KIU Plasma	July 2022		

**Time bound Plan for Downstream Business (Supply Chain Certification)**

No	Subsidiaries & Ownership (%)	Name of Plant	TBP for Certification	Status as of 31 March 2018	Any unresolved non-compliances
1	Genting Musim Mas Refinery Sdn Bhd (72%)	Genting Musim Mas Refinery	Not applicable	Certified	None



**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in 2017 for Genting Tanjung Oil Mill and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in 2017 for Genting Tanjung Oil Mill and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	5.79
PK	5.79

Extraction	%
OER	20.6
KER	5.24

Production	t/yr
FFB Process	313,500.32
CPO Produced	64,581.07
PK Produced	16,427.42

Land Use	Ha
OP Planted Area	17,242.47
OP Planted on peat	151.0564
Conservation (forested)	187.84
Conservation (non-forested)	0
<b>Total</b>	<b>17,581.3664</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	143,907.78	0.46	0	0	0	0	143,907.78	0.46
CO <sub>2</sub> Emission from fertilizer	15,327.34	0.05	0	0	0	0	15,327.34	0.05
NO <sub>2</sub> Emmision	15,026.87	0.05	0	0	0	0	15,026.87	0.05
Fuel Consumption	5,266	0.02	0	0	0	0	5,266	0.02
Peat Oxidation	8,247.88	0.03	0	0	0	0	8,247.88	0.03
<b>Sink</b>								
Crop Sequestration	-76,762.76	-0.24	0	0	0	0	-76,762.76	-0.24
Conservation Sequestration	-1,722.49	-0.01	0	0	0	0	-1,722.49	-0.01

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<b>Total</b>	<b>109,290.6</b>	<b>0.35</b>	0	0	0	0	<b>109,290.6</b>	<b>0.35</b>
	<b>2</b>						<b>2</b>	

\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	421,509.07	1.12
Fuel Consumption	764.79	0
Grid Electricity Utilisation	113.06	0
<b>Credit</b>		
Export of Grid Electricity	-164.32	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>422,11222.6</b>	<b>1.12</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

Emissions	tCO <sub>2</sub> e
PK from own mill	114,077.47
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	2
Divert to anaerobic diversion (%)	98

<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

**Appendix D: General Chain of Custody Requirements for the Supply Chain**

<b>5.1 Applicability of the general chain of custody requirements for the supply chain</b>			
	<b>Requirement</b>	<b>Evidence</b> For any N/A raised, justification is required.	<b>Compliance</b> (Yes / No or N/A)
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Genting Tanjung Oil Mill takes legal ownership and physically handles its RSPO certified oil palm products such as CPO and PK.	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Genting Tanjung Oil Mill is not a trader and distributor. Therefore, no license is required and the requirement is not applicable.	Yes
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	Genting Plantations Berhad held RSPO membership number: 1-0086-06-000-00 since 14 November 2006. Genting Tanjung Oil Mill has registered in Palm Trace system as follows: Members ID: RSPO_PO1000005521 License valid until 01/10/2019 Member category : Oil Mill	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	Genting Tanjung Oil Mill is not refinery, therefore no processing aids need to be included.	Yes
<b>5.2 Supply chain model</b>			

5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	Genting Tanjung Oil Mill is using Mass Balance Supply Chain Module since the FFB suppliers are of RSPO certified estates which under Genting Tanjung Complex and other independent smallholders. Declassification of the CPO or PK was done in accordance to the correct order.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Genting Tanjung Oil Mill is Mass Balance certified and sales of the products were of MB or conventional only.	Yes
<b>5.3. Documented Procedures</b>			
5.3.1	<p>The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> </ul>	<p>Supply Chain and Traceability (Mill) Procedure, Doc. No. SMP-GPB-23 dated 24/8/2018 has been established to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. Besides, procedures that are relevant were developed as below:</p> <ol style="list-style-type: none"> <li>Incoming Inspection (Direct Material), Doc. No. PM-PRD-04 dated 2/1/2018</li> <li>Product Identification &amp; Traceability, Doc. No. PM-PRD-01 dated 2/1/2018</li> <li>Handling, Storage, Preservation and Delivery, Doc. No. PM-LAB-03 dated 2/1/2018</li> <li>Internal Audit, Doc. No. PM-IA-01 dated 2/1/2018</li> <li>Management Review, Doc. No. PM-MR-01 dated 2/1/2018</li> </ol>	Yes
	<ul style="list-style-type: none"> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>	<p>Among the records included in the procedures are:</p> <ol style="list-style-type: none"> <li>Weighbridge tickets</li> <li>Dispatch of CPO/PK delivery note</li> <li>Daily Production Report</li> <li>Mass Balance Worksheet</li> <li>Training records</li> </ol>	Yes

		<p>All the records were found to be up-to-date.</p> <p>The training record was sighted for Supply Chain and Traceability (Mill) Procedure training conducted on 27/6/2018 which involved the person responsible such as Mill Manager, Weighbridge operator and transporters. Attendance list was sighted.</p>	
	<ul style="list-style-type: none"> <li>• Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard.</li> </ul>	<p>The Senior Mill Manager has appointed Chief Clerk of Genting Tanjung Oil Mill as person-in-charge for Supply Chain, Traceability and Mass Balance requirements of RSPO, ISCC and MSPO sustainability standards. Appointment letter dated 25/1/2017 was sighted. The person-in-charge has been trained on 27/6/2018 by Sustainability Executive. Interviewed with the Chief Clerk confirmed that she was able to demonstrate the implementation of their procedures in accordance to the standard.</p>	Yes
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<p>Internal Audit Procedure, Doc. No. PM-IA-01 dated 2/1/2018 was developed and implemented in the Oil Mill. The frequency of the internal audit is not less than once a year as per the procedure. The requirements of RSPO have been addressed in the procedure.</p>	Yes
	<p>ii) effectively implements and maintains the standard requirements within its organization</p>	<p>The last internal audit was carried out on 17/10/2018 by Sustainability Executive. There was neither non-conformance nor OFI was raised during the audit through verified the internal audit checklist report.</p>	Yes
<p><b>5.4. Purchasing and goods in</b></p>			

<p>5.4.1</p>	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g. of information available in the DO is as follows:</p> <ul style="list-style-type: none"> <li>• Consignment note no.</li> <li>• Estate's names</li> <li>• Date &amp; time of delivery</li> <li>• Field No.</li> <li>• No. of bunches</li> <li>• Vehicle no.</li> <li>• Seal no.</li> </ul> <p>E.g. of information available in the mill's weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> <li>• Weighbridge ticket no.:</li> <li>• Name of estates</li> <li>• Field No.</li> <li>• Name of driver</li> <li>• Vehicle no.</li> <li>• Date &amp; time in/out</li> <li>• Total bunches</li> <li>• Seal no.</li> </ul> <p>Net weight</p>	<p>Yes</p>
	<p>Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</p>	<p>The information was available in various documents such as delivery order and weighbridge tickets.</p>	<p>Yes</p>

	<ul style="list-style-type: none"> <li>The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	The mill has a list of certified FFB suppliers which has the information about certificate number and validity period. This is applied to both second and third party FFB suppliers. The origins of all third-party sourced Fresh Fruit Bunches (FFB) is verified via list of approved FFB supplier rev:6, dated 28/7/17. Thus, no RSPO certified oil palm products and announcement made for Genting Tanjong POM.	Yes
	<ul style="list-style-type: none"> <li>A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (<a href="http://www.rspo.org">www.rspo.org</a>) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.</li> </ul>	A check of the validity of supply chain certification of supplier is done via the list of RSPO Supply Chain Certified sites on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ).	Yes
	<ul style="list-style-type: none"> <li>The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements.</li> </ul>	NA – this part is applicable for supply chain actor after refinery.	Yes
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Addressed in the SOP, Supply Chain and Traceability, SMP-GPB-23, rev:07 dated 24/8/18, clause 9.7 and 9.8 for handling of Non-conforming Products.	Yes
<b>5.5. Outsourcing activities</b>			
5.5.1	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.	The company has outsourced the transportation for CPO and PK delivery to third parties. Transporter Agreements were sighted as below: <ul style="list-style-type: none"> <li>a. Landasan Kember Sdn Bhd valid from 1/1/2018 to 31/12/2020 for CPO and PK.</li> <li>b. Chong Shu Min Trading valid from 1/1/2018 to 31/12/2020 for CPO and PK.</li> </ul>	Yes

	<p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	<p>Requirement to adhere to RSPO standard is clearly defined in the agreement and the contractors have acknowledged on the requirements to be complied.</p> <p>The transporters have been trained on the new RSPO Supply Chain and Traceability (Mill) procedure on 27/6/2018 by Sustainability Executive. Attendance list of the training was sighted.</p> <p>The management has carried out Supplier Monitoring Report – CPO Tanker Transporters on yearly basis and the last monitoring was carried out on 1/8/2018 by Mill Manager for the monitoring period from 1/8/2017 to 31/7/2018. The management has decided to continue the transporters as approved suppliers.</p>	
5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>	<p>Not applicable. No outsourcing activity.</p>	N/A
	<p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	<p>Not applicable. No outsourcing activity.</p>	N/A
	<p>c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	<p>Not applicable. No outsourcing activity.</p>	N/A
	<p>d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their</p>	<p>Not applicable. No outsourcing activity.</p>	N/A



	respective operations, systems, and any and all information, when this is announced in advance.		
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Not applicable. No outsourcing activity.	N/A
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	Not applicable. No outsourcing activity.	N/A
<b>5.6. Sales and goods out</b>			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/ delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>Genting Tanjung POM ensured the required information is available in document form. Sampled contract: SSD/0918/T01PK dated 30/8/10, quantity 900 mt</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer; XXX</li> <li>• The name and address of the seller: Genting SDC Sdn Bhd, Genting Tanjung POM</li> <li>• The loading or shipment/ delivery date; e.g. delivery month of September 2018, (12/9/18 – 30/9/18)</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Palm Kernel (PK), PK RSPO MB</li> <li>• The quantity of the products delivered; e.g. 18.82 mt</li> <li>• Any related transport documentation; e.g. Despatch note e.g. #PKMB18000290W</li> <li>• Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 652320</li> <li>• A unique identification number referred to shipping confirmation number, TR-d6a3e577-ad59 dated 13/10/18</li> </ul>	Yes

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		<p>Sample contract and delivery for crude palm oil; SSD/1018/T03CPO dated 23/9/18, quantity: 2,650 mt</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer; XXX</li> <li>• The name and address of the seller: Genting SDC Sdn Bhd, Genting Tanjung POM</li> <li>• The loading or shipment/ delivery date; e.g. delivery month of October 2018, (11/10/18 – 22/10/18)</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Palm Kernel (PK), PK RSPO MB</li> <li>• The quantity of the products delivered; e.g. 39.60 mt</li> <li>• Any related transport documentation; e.g. Despatch note e.g. #CPOMB1800075W</li> <li>• Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 652320</li> <li>• A unique identification number referred to shipping confirmation number, TR-bc2b349b-e19c dated 23/10/18</li> </ul>	
	<ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	<p>Information is complete and available in various documents such as sales contract, mill weighbridge ticket, delivery note, transporter collection order.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> <li>• For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	<p>Verified list of physical delivery and shipping confirmation for the last 12 months, November 2017 to October 2018. All transactions were registered under palm trace.</p>	<p>Yes</p>
<p><b>5.7. Registration of transactions</b></p>			

5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>are mills, traders, crushers and refineries and;</li> <li>take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	<p>The registration of Palm Trace is carried out by Genting Marketing Department, HQ. All transaction will be registered in the Palm Trace.</p>	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> <li>Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</li> <li>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</li> <li>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> <li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>	<p>Based on the announcement summary, all the registrations were found to be in order. Detailed transaction can be found under table ### of the report.</p> <p>Not applicable. Products are not sold beyond refinery.</p> <p>Based on the quarterly mass balance accounting sheet, the removal of volumes was done correctly when the products were sold as conventional.</p> <p>Based on the announcement summary, all the confirmations were found to be in order.</p>	<p>Yes</p> <p>N/A</p>
<b>5.8. Training</b>			

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5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Genting Tanjung Oil Mill has developed Training Plan 2018 which has planned for the training of weighbridge operation and supply chain & traceability.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	There was a training on the revised Supply Chain and Traceability Procedure carried out by Sustainability Executive to the mill management and transporters on 27/6/2018. Attendance list was sighted where Chief Clerk, Weighbridge Operator, Mill Manager and transporters have participated in the training.	Yes
<b>5.9. Record Keeping</b>			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	Genting Tanjung Oil Mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirement as below: <ul style="list-style-type: none"> <li>a. Internal audit reports</li> <li>b. Management review minutes</li> <li>c. Weighbridge tickets</li> <li>d. Training records</li> </ul>	Yes
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Seen the List of QESH Records confirmed that the retention period of all the records is minimum 2 years. For eg: <ul style="list-style-type: none"> <li>a. FFB Reception Inspection Checklist</li> <li>b. CPO Despatch Checklist</li> <li>c. Daily Production Report</li> <li>d. Weighbridge tickets – 3 years</li> </ul>	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	Reconciliation of inputs (FFB), stock and delivery was done on quarterly basis using mass balance sheet table. Refer to ISCC, RSPO and MSPO Sustainable Product – Monthly Movement Summary Report CPO and PK last updated 12/11/18.	Yes
<b>5.10. Conversion factors</b>			

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5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Conversion rate is based on actual yield performance. For the last review period (Nov 17 – Oct 18); OER: 20.79%, KER: 5.45 %	Yes
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	Conversion rate is based on actual yield performance. For the last review period (Nov 17 – Oct 18); OER: 20.79%, KER: 5.45 %	Yes
<b>5.11. Claims</b>			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	The company does not make any claims regarding the use of or support of RSPO certified oil palm products through verified the company website, purchase order, contract, delivery order and any other company communication method.	Yes
<b>General corporate communications</b>			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Genting Tanjung Oil Mill does not use any RSPO trademark or logo in any general corporate communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.	Yes
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address ( <a href="http://www.rspo.org">www.rspo.org</a> ) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO.	Genting Tanjung Oil Mill does not use any RSPO trademark or logo in any general corporate communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.	Yes

	e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at <a href="http://www.rsपो.org">www.rsपो.org</a> ' where the link must lead to the member's profile page.		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	No trademark has been used and therefore no statement been made for the trademark used.	Yes
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	The products, CPO and PK are not using the RSPO trademark.	Yes
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No RSPO corporate logo used as evidence during the documentation review and site visit.	Yes
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Genting Tanjung Oil Mill does not use any RSPO trademark or logo in any business to business communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.	Yes
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Genting Tanjung Oil Mill does not use any RSPO trademark or logo in any business to business communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.	Yes
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS	Genting Tanjung Oil Mill does not use any RSPO trademark or logo in any business to business communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.	Yes

	<p>certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>Genting Tanjung Oil Mill does not use any RSPO trademark or logo in any business to business communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.</p>	Yes
<b>Business to consumer communication</b>			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.</p>	<p>Genting Tanjung Oil Mill does not use any RSPO trademark or logo in any business to consumer communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.</p>	Yes
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	<p>Genting Tanjung Oil Mill does not use any RSPO trademark or logo in any business to consumer communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.</p>	Yes
6.3	<p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p>	<p>Genting Tanjung Oil Mill does not use any RSPO trademark or logo in any business to consumer communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.</p>	Yes

6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Genting Tanjung Oil Mill does not use any RSPO trademark or logo in any business to consumer communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.	Yes
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	Genting Tanjung Oil Mill does not use any RSPO trademark or logo in any business to consumer communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.	Yes
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Genting Tanjung Oil Mill does not use any RSPO trademark or logo in any business to consumer communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.	Yes
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Genting Tanjung Oil Mill does not use any RSPO trademark or logo in any business to consumer communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.	Yes
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw	Genting Tanjung Oil Mill does not use any RSPO trademark or logo in any business to consumer communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.	Yes



	permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a> .		
<b>5.12. Complaints</b>			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	The company has established Handling of Customer Feedback/ Complaints procedure, Doc. No. PM-MKT-05 dated 2/1/2018 where the procedure has defined the actions and responsibilities of the management to handle customer complaints to ensure no recurrence of the same defect. Besides, Corrective Action procedure, Doc. No. PM-MGR-02 dated 2/1/2018 to define the implementation of corrective action arising from customer complaints or complaints/ reports and QESHS non-conformities from within the organizations.	Yes
<b>5.13. Management Review</b>			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	The company has established Management Review procedure, Doc. No. PM-MR-01 dated 2/1/2018 and objective is to ensure the company's policy, QESHS management system performance continue to meet the customer requirements, legal and other requirements. The frequency of the management review was set at least once a year.	Yes
5.13.2	The input to management review shall include information on: <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> </ul>	The last management review meeting was conducted on 26/10/2018 and meeting minutes was sighted. All the inputs were covered during the meeting as verified through the meeting minutes. Agenda that has discussed such as: <ul style="list-style-type: none"> <li>a. Results of internal RSPO SCCS Audit – Conducted on 17/10/2018 and there was no non-conformance raised.</li> <li>b. Customer feedback – As per 2017 there is no complaints from the mill customer – GMMR.</li> </ul>	Yes

	<ul style="list-style-type: none"> <li>Recommendations for improvement.</li> </ul>		
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>Improvement of the effectiveness of the management system and its processes.</li> <li>Resource needs.</li> </ul>	<p>The output from management review including decisions and actions were clearly recorded in the minute of meeting dated 26/10/2018 pertaining to the improvement and resource needs.</p>	Yes

**Appendix E: CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: Mass Balance )**

E.1 Definition			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
E.1.1	<p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Genting Tanjung POM receives and process both certified and non-certified. Therefore, it uses the Mass Balance supply chain system and module. During the P&amp;C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.</p>	Yes

<b>E.2 Explanation</b>			
E.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. Refer to table A and B.	Yes
E.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim). Detail of transaction can be found under table C	Yes
<b>E.3 Documented procedures</b>			
E.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a. Complete and up to date procedures covering the implementation of all the elements in these requirements;	Supply Chain and Traceability (Mill) Procedure, Doc. No. SMP-GPB-23 dated 24/8/2018 has been established to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. Besides, procedures that are relevant were developed as below: a. Incoming Inspection (Direct Material), Doc. No. PM-PRD-04 dated 2/1/2018 b. Product Identification & Traceability, Doc. No. PM-PRD-01 dated 2/1/2018 c. Handling, Storage, Preservation and Delivery, Doc. No. PM-LAB-03 dated 2/1/2018 d. Internal Audit, Doc. No. PM-IA-01 dated 2/1/2018 e. Management Review, Doc. No. PM-MR-01 dated 2/1/2018	Yes

	<p>b. The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</p>	<p>The Senior Mill Manager has appointed Chief Clerk of Genting Tanjung Oil Mill as person-in-charge for Supply Chain, Traceability and Mass Balance requirements of RSPO, ISCC and MSPO sustainability standards. Appointment letter dated 25/1/2017 was sighted. The person-in-charge has been trained on 27/6/2018 by Sustainability Executive. Interviewed with the Chief Clerk confirmed that she was able to demonstrate the implementation of their procedures in accordance to the standard.</p>	<p>Yes</p>
<p>E.3.2</p>	<p>The site shall have documented procedures for receiving and processing certifies and non-certified FFBS.</p>	<p>Supply Chain and Traceability (Mill) Procedure, Doc. No. SMP-GPB-23 dated 24/8/2018 has been established to ensure the handling of incoming FFB and outgoing certified and uncertified CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. System available to make marking on the receiving documents to differentiate the certified and noncertified FFB received. Interviewed the weighbridge officer and confirmed that the FFB from own estates will have the stamp on the dispatch chip.</p>	<p>Yes</p>
<p><b>E.4 Purchasing and goods in</b></p>			
<p>E.4.1</p>	<p>The site shall verify and document the volumes of certified and non-certified FFBS received.</p>	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and noncertified FFB. Records verified by internal and external audit.</p> <p>The accompanying documents of incoming FFB from own estate are estate’s weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its</p>	<p>Yes</p>

		<p>weighbridge ticket as confirmation of receipt. The estate's ticket number is recorded in the mill's ticket number. For example; Genting Layang Estate, ticket no. FFB18035775W dated 16/11/18. DO no. 050283, lorry no. SD5577A, weight: 4.710 mt. ID: RSPO certified FFB, certificate no. RSPO 652320.</p> <p>For non-certified third party crop, they presents their DO to the mill and mill's issues weighbridge ticket as confirmation of receipt. All 3<sup>rd</sup> party crops will be put under non-certified portion crop.</p>	
E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The facility is aware of this procedure. There was no projected overproduction for the period under review.	Yes
<b>E.5 Record keeping</b>			
E.5.1	a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis by RSPO.	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and noncertified FFB. Computerized system in place. Records verified by internal and external audit Reconciliation of stock and delivery was done on quarterly basis using mass balance sheet table. Refer to ISCC, RSPO and MSPO Sustainable Product – Monthly Movement Summary Report CPO and PK last updated 12/11/18.	Yes
	b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated	Computerized balance sheet system in place with the delivery deducted accordingly. Based on the latest ISCC, RSPO and MSPO Sustainable Product – Monthly Movement Summary Report CPO and PK last updated 12/11/18, delivery and stock recorded as per below: <u>CSPO delivery</u> Total: 5,570.71 mt CSPO stock availability : 60,413.27 mt	Yes

		<p>Other scheme (ISCC): 52,521.96 mt Non-certified: 2,031 mt</p> <p><u>CSPK delivery</u> Total: 16,095.81 mt CSPK stock availability : 13,880.71 mt Other scheme (ISCC): Nil Non-certified: 1,200 mt</p>	
	<p>c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.) For further details refer to Module C.</p>	<p>Based on verification of MB accounting which the mill opted for three-monthly basis recording, it was found that the certified CPO/PK was always delivered from positive stock. Based on the latest ISCC, RSPO and MSPO Sustainable Product – Monthly Movement Summary Report CPO and PK last updated 12/11/18, no negative stock recorded at the end of inventory period of 3 month.</p>	<p>Yes</p>

**Supply Chain Declaration** *(Applicable For Appendix E)*

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	November 2017	30,306.48	7,744.04	38,050.52
2	December 2017	27,768.68	6,963.36	34,732.04
3	January 2018	23,999.93	5,351.45	29,351.38
4	February 2018	24,659.07	4,751.33	29,410.40
5	March 2018	25,495.07	4,693.89	30,188.96
6	April 2018	24,901.23	3,876.77	28,778.00
7	May 2018	24,806.22	3,178.00	27,984.22
8	June 2018	19,882.70	2,298.16	22,180.86
9	July 2018	19,191.87	2,569.91	21,761.78
10	August 2018	20,437.69	3,619.36	24,057.05
11	September 2018	22,461.60	5,876.94	28,338.54
12	October 2018	26,714.55	7,522.33	34,236.88
13	Total	290,625.09	58,445.54	349,070.63

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	November 2017	6,367.39	1,585.03
2	December 2017	5,850.86	1,530.05
3	January 2018	4,857.59	1,351.20
4	February 2018	5,205.53	1,432.69
5	March 2018	5,412.60	1,374.18
6	April 2018	5,259.14	1,334.71
7	May 2018	5,154.73	1,448.68
8	June 2018	4,049.78	1,133.86
9	July 2018	4,024.54	900.10
10	August 2018	4,234.69	1,105.68
11	September 2018	4,543.98	1,242.13
12	October 2018	5,452.44	1,394.50

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13	Total	60,413.27	15,832.81
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<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	XYZ	TR-af62f0f9- c0d0	2,430	500
2	XYZ	TR-2842bce4- dfdf	492.79	101.71
3	XYZ	TR-bc2b349b- e19c	2,647.92	13,279
		Total	5,570.71	13,880.71

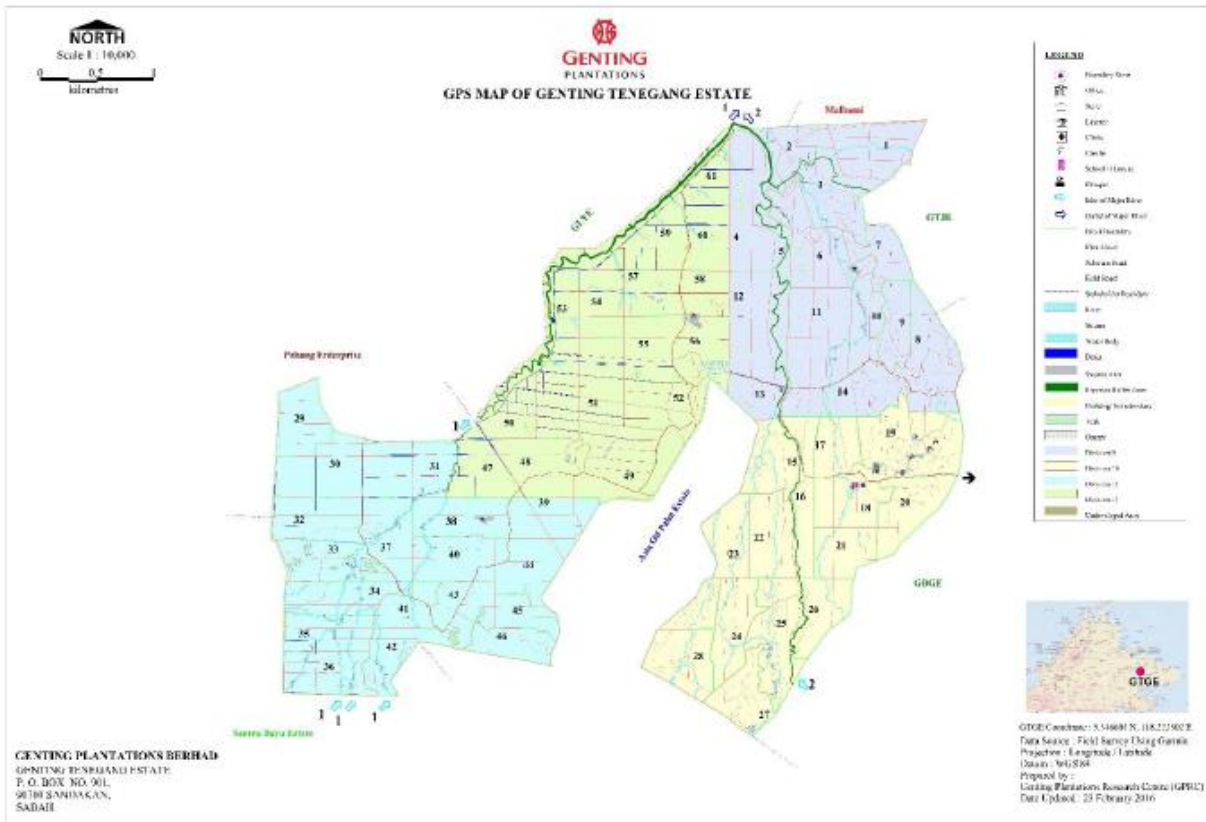
<b>D. Records of CPO &amp; PK Sold under other schemes to Buyers since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	A	ISCC EU	52,521.96	0
Total			52,521.96	0

<b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (if any)</b>				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	A	2,031	0	
2	B	0	800	
3	C	0	400	
4	Total	2,031	1,200	

<b>F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)</b>			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
Nil			

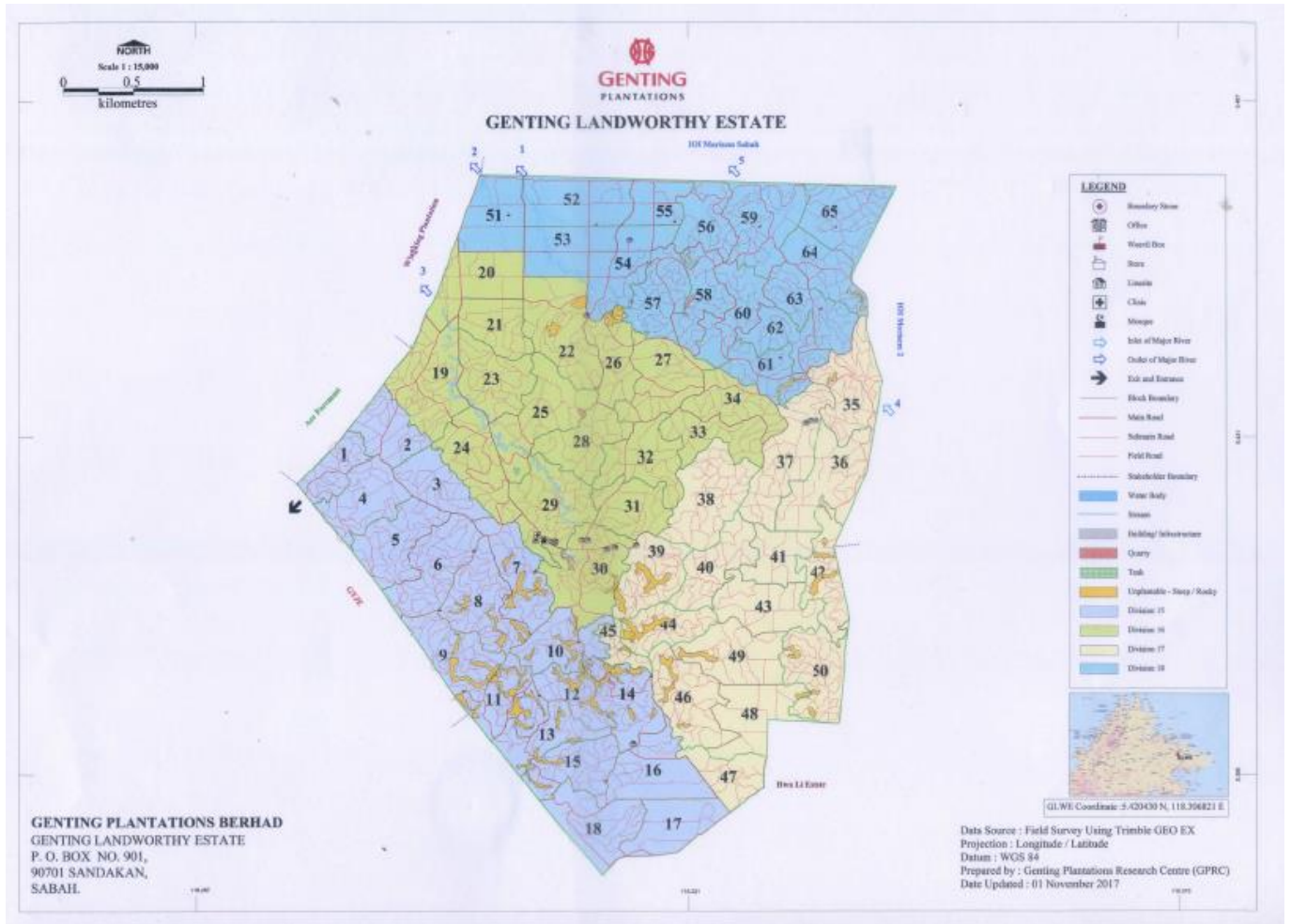


**Appendix F: Location Map of Genting Tanjung Oil Mill Certification Unit and Supply bases**





**Appendix H: Genting Landworthy Estate Field Map**



**Appendix I: List of Smallholder Sampled** *(If applicable – scheme/associated/group certification)*

Not applicable

## **Appendix J: List of Abbreviations**

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel 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
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure