

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (ASA_1)
- Recertification Assessment
- Extension of Scope

Client Company name (Parent Company): GENTING PLANTATIONS BERHAD
Client company Address: 10th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia.
Certification Unit: Genting Jambongan Oil Mill Location of Certification Unit: Jambongan Island, 90100 Beluran District, Sabah, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
Parent Company	Genting Plantations Berhad		
RSPO Membership Number	1-0086-06-000-00	Membership Approval Date	14/11/2006
Address	10 th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia.		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Genting SDC Sdn Bhd - Genting Jambongan Oil Mill		
Location / Address	Jambongan Island, 90100 Beluran District, Sabah, Malaysia		
Website	www.gentingplantations.com		
Management Representative	Mr. Arunan Kandasamy (Senior Vice President – Plantation Division)	E-mail	Arunan.kandasamy@genting.com
Telephone	+603 2333 6510 (Head Office) +607 7631 992	Facsimile	+603 2333 6575

2. Certification Information			
Certificate Number	RSPO 709622	Date of First Certification	26/8/2019
		Certificate Start Date	26/8/2019
		Certificate Expiry Date	25/8/2024
Scope of Certification	Palm Oil and Palm Kernel Production		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Applicable Standards	<input type="checkbox"/> RSPO P&C 2018 with supply chain Module <input type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 with supply chain Module <input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 715401	MSPO Supply Chain Certification Standard 2018	BSI Services (Malaysia) Sdn Bhd	26/08/2024
EU-ISCC-Cert-DE119-60194826	ISCC	ASG Cert	05/12/2020

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MSPO 709464	MS 1500:MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3	BSI Services (Malaysia) Sdn Bhd	08/08/2024
MSPO 709462	MS 1500:MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services (Malaysia) Sdn Bhd	08/08/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Genting Jambongan Oil Mill	Jambongan Island, 90100 Beluran District, Sabah, Malaysia	6°38'59.3" N	117°27'3.3" E
Genting Jambongan Estate	Jambongan Island, 90100 Beluran District, Sabah, Malaysia	6°38'59.3" N	117°27'3.3" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Jambongan	13,790.14	24.36	247.80	4,062.30	93.30
Total	3,790.14	24.36	247.80	4,062.30	93.30

Note: ¹Variance of 103.13 Ha compared to previous year due to some unplanted areas have been resurveyed and excised.

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Jambongan	434.51	62.52	3,293.11	0	0	3,355.63	434.51
Total (ha)	434.51	62.52	3,293.11	0	0	3,355.63	434.51

Note:

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7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (Aug 2019-Jul 2020)	Actual (Aug 2019-Jul 2020)		Forecast (Aug 2020-Jul 2021)
		<i>Previous license period (NA)</i>	<i>Current license period (Aug 2019-Jul 2020)</i>	
Jambongan	70,591.20	NA	56,467.06	72,369.00
Total	70,591.20	NA	56,467.06	72,369.00
Note:				

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *				
Estate	Tonnage / year			
	Estimated N/A	Actual		Forecast N/A
		<i>Previous license period</i>	<i>Current license period</i>	
Nil				
Total				
Note: -				

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable				
Independent FFB Supplier	Tonnage / year			
	Estimated (Aug 2019-Jul 2020)	Actual (Aug 2019-Jul 2020)		Forecast (Aug 2020-Jul 2021)
		<i>Previous license period (NA)</i>	<i>Current license period (Aug 2019-Jul 2020)</i>	
Bahagia Jaya	4,200.00	6,395.17	4,089.10	5,610.00
Total	4,200.00	6,395.17	4,089.10	5,610.00
Note:				

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10. Certified Tonnage				
	Estimated (Aug 2019-Jul 2020)	Actual (Aug 2019-Jul 2020)		Forecast (Aug 2020-Jul 2021)
		<i>Previous license period (NA)</i>	<i>Current license period (Aug 2019-Jul 2020)</i>	
Mill Capacity: 20 MT/hr	FFB	FFB	FFB	FFB
	70,591.20	NA	56,467.06	72,369.00
SCC Model: MB	CPO (OER: 23.00%)	CPO (OER: %)	CPO (OER: 23.38%)	CPO (OER: 24.16%)
	*20,435.93	NA	13,203.01	17,483.00
	PK (KER: 4.20%)	PK (KER: %)	PK (KER: 4.80%)	PK (KER: 4.49%)
	*3,724.82	NA	2,711.70	3,251.00

Note: -

*There is volume extension which is CSPO: 4200 mt and CSPK: 760 mt.

11. Actual Sold Volume (CPO) (Aug 2019-Jul 2020)					
Current License period (Aug 2019-Jul 2020)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	1,794.73	10,323.90	0	988.65	13,107.28
Previous License period (NA)					
CPO (MT)	NA				

12. Actual Sold Volume (PK) (Aug 2019-Jul 2020)					
Current License period (Aug 2019-Jul 2020)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	837.10	0	0	1,844.71	2,681.81
Previous License period (NA)					
PK (MT)	NA				

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	0	0
IS-CSPKO	0	0
IS-CSPKE	0	0

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
Website: 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 1st annual assessment was conducted from 24-27/08/2020. The audit programme is included in Section 2.3. 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 assessment was conducted off-site due to the movement control order by the government on 30/10/2020. The ICT used for verification of the corrective action evidence were e-mails and Microsoft team. The communication was between the Lead Auditor and three Genting's Sustainability Department personnel.

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 P&C MYNI 2019 was used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The 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 meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between

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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

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

Tentative Date of Next Visit: May 10, 2021 - May 13, 2021

Total No. of Mandays: 9.5

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Valence Shem (VSH)	Team Leader	He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. Able to communicate in Bahasa Malaysia and English.
Muhd Fadzly Masran (MFM)	Team Member	Fadzli graduated in Bachelor of Forestry Science at University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. During this assessment, he assessed on the aspects of legal, estate & mill best practices, environmental and workers consultation. He is fluent in Bahasa Malaysia and English languages.
Elzy Ovktafia Chairul	Team Member	She graduated from Universiti Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters and currently in the midst of completing the AISP level (professional certificate and recognition from the Incorporated Society of Planters). She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Audit for Social Compliance Programme (URSA, ETI) for 2 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for almost 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During this assessment, she assessed on the aspects of legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English.

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Accompanying Persons:

Name	Role
NA	

2.3 Assessment Plan

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

Date	Time	Subjects	VSH	EOC	MFM
Monday 24/8/2020	0830-0900	Opening meeting: <ul style="list-style-type: none"> • Opening presentation by audit team leader • Confirmation of assessment scope and finalize audit plan (including stakeholder’s consultation) 	✓	✓	✓
	0900-1300	Jambongan Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓
	1000 - 1300	Stakeholder consultations: Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-
	1300-1400	Lunch break			
	1400-1630	Jambongan Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓
	1630-1700	Interim closing briefing			
Tuesday 25/8/2020	0900-1230	Jambongan Estate Document review P1 – P7: (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.).	✓	✓	✓
	1230-1300	Interim closing briefing			
	1300-1400	Lunch break			
	1400-1630	Jambongan Oil Mill 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, meeting stakeholders, etc.	✓	✓	✓

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	1630-1700	Interim closing briefing			
Wednesday 26/8/2020	0900-1300	Jambongan Oil Mill Document Review P1 – P7: 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.	✓	✓	✓
	1300-1400	Lunch break			
	1400-1630	Jambongan Oil Mill Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	✓	✓	✓
	1630-1700	Interim closing briefing			
Thursday 27/8/2020	0900-1200	Jambongan Oil Mill RSPO Supply Chain Site visit: Incoming of FFB and outgoing of CSPO & CSPK – weighbridge, ramp, storage area, loading bays, etc. Documentation review: RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	✓	-	-
	1200-1230	Audit team discussion & preparation for closing meeting	✓	✓	✓
	1230-1300	Closing meeting			

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Genting Plantations Berhad Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- Malaysia National Interpretation 2019 for RSPO P&C 2018
- Independent Smallholder Standard 2019

3.2 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	All subsidiaries, estates, mills and refinery (existing operations and yet to be constructed) except those estates (landholdings) planned to be developed into property development (West Malaysia)	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	The first oil mill and its supply bases were certified in 2015. As per June 2020, the mill and estate was certified as per TBP.	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No new acquisition as of June 2020.	Yes
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No. The group's target for 100% certification of own estates and mills remains at 2023. The group is in progress to obtain HGU for the remaining concessions and will update if there is any delay on this requirement.	Yes
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No lapses however re-scheduling of the certification dates has been made.	Yes
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	None.	Yes
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	<u>Sabah</u> 1.Genting Kencana Estate – LUCA passed, Concept Note for Remediation and Compensation submitted to Panel. The concept note will be resubmitted to the Panel in 4Q 2020.	Yes

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	Indonesia 1. PT GAL – LUCA under review by RSPO.																			
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	NPP for PT PALJ, PT AAC, PT UAI, PT SMA, PT KIU are 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. <i>Note:</i> <i>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported. Please refer to BSI-RSPO Secretariat approval.</i>	No new complaint. Latest was on 2016, Based on the following: http://www.rspo.org/members/complaints/statusof-complaints/view/38 Complaints officially closed on 31 October 2016. From the update, RaCP status as per below:- <table border="1" data-bbox="699 745 1279 1301"> <thead> <tr> <th>Unit</th> <th>RaCP status</th> <th>LUCA report status</th> </tr> </thead> <tbody> <tr> <td>PT Globalindo Agung Lestari</td> <td>Ongoing</td> <td>In progress (Clarification process)</td> </tr> <tr> <td>PT Sepanjang Inti Surya Mulia</td> <td>Completed</td> <td>Completed</td> </tr> <tr> <td>PT Agro Abadi Cemerlang</td> <td>Completed</td> <td>Completed</td> </tr> <tr> <td>Genting Jambongan Estate (GJBE)</td> <td>Ongoing</td> <td>Completed</td> </tr> <tr> <td>Genting Kencana Estate (GKCE)</td> <td>Ongoing</td> <td>Completed</td> </tr> </tbody> </table>	Unit	RaCP status	LUCA report status	PT Globalindo Agung Lestari	Ongoing	In progress (Clarification process)	PT Sepanjang Inti Surya Mulia	Completed	Completed	PT Agro Abadi Cemerlang	Completed	Completed	Genting Jambongan Estate (GJBE)	Ongoing	Completed	Genting Kencana Estate (GKCE)	Ongoing	Completed	Yes
Unit	RaCP status	LUCA report status																		
PT Globalindo Agung Lestari	Ongoing	In progress (Clarification process)																		
PT Sepanjang Inti Surya Mulia	Completed	Completed																		
PT Agro Abadi Cemerlang	Completed	Completed																		
Genting Jambongan Estate (GJBE)	Ongoing	Completed																		
Genting Kencana Estate (GKCE)	Ongoing	Completed																		
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No.	Yes																		
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Based on the following: https://askrspo.force.com/Complaint/s/casetracker No legal non-compliance	Yes																		
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes, The Internal audit was conducted for uncertified units on periodical basis by Sustainability Team. Positive assurance is stated in the internal audit report.	Yes																		
Have there been any stakeholder (including NGO) consultation conducted?	To-date, no comments received from stakeholders on the TBP.	Yes																		

3.3 Progress of scheme smallholders and/or outgrowers

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? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	NA as no scheme smallholders.	NA

3.4 Details of Nonconformities

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

During this Assessment there were one (1) Major (Critical) ; five (5) Minor nonconformities and zero (0) Opportunity For Improvement raised. The Genting Jambongan Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	1946100-202008-M1	Clause & Category (Critical / Minor)	4.1.1 Critical
Date Issued	27/8/2020	Due Date	25/11/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	30/10/2020
Statement of Nonconformity:	The social policy is inadequate.		
Requirement Reference:	A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.		
Objective Evidence:	The Social Policy (incorporating the labour and human rights requirements) dated 22 June 2015 is available but not includes prohibiting retaliation against Human Rights Defenders (HRD) therefore is yet to be communicated to all levels of the workforce, operations, FFB suppliers and local communities.		

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Corrections:	The top management already approve the new revised Social Policy dated 14 September 2020. Sustainability Department will brief the policy to estate and mill management. Estate and Mill management will arrange a briefing session for this policy to be communicated to all levels of the workforce, operations, FFB suppliers and local communities.
Root Cause Analysis:	The draft policy with inclusion of HRD elements was prepared (by Sustainability Department) and available since Feb 2020. However, the approval by top management was delayed due to Covid19/MCO as unable to conduct physical meeting.
Corrective Actions:	In the event of unable to conduct any physical meeting for discussion on new company policies, SD (Sustainability Dept.) will arrange online meeting or discussion with top management.
Assessment Conclusion:	Evidence verified: i) The revised Social Policy dated 14/9/2020 that shows the inclusion of prohibiting retaliation against Human Rights Defenders (HRD) ii) Training records entitled "Briefing on New Revised Company's Social Policy" dated 23/9/2020 (GJBE) and 24/9/2020 (GJOM) Based on the evidence of correction and corrective action, the NCR is effectively closed out. Continuous implementation shall be verified in the next assessment.

Non-conformity			
NCR Ref #	1946100-202008-N1	Clause & Category (Major / Minor)	1.2.1 Minor
Date Issued	27/8/2020	Due Date	Next assessment
Closed (Yes / No)	No	Date of nonconformity Closure	NA
Statement of Nonconformity:	The code of business conduct is not implemented effectively to recruitment agency.		
Requirement Reference:	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.		
Objective Evidence:	Recruitment agency (Agensi MNK) has yet to sign the Addendum to Contract Agreement and Code of Business Conduct for Third Parties.		
Corrections:	Sustainability Dept. with the assist from HR GPOS will follow up on this matter to ensure Agensi MNK to reply the email. The email already replies by Agensi MNK on 25th September 2020, they received the policy.		
Root Cause Analysis:	Genting Plantation already sent out the email regarding Code of Business Conduct for Third Parties to Agensi MNK on 22nd July 2020. However, the email is not yet reply by the mentioned receiver.		
Corrective Actions:	Sustainability Dept. will follow up any new and revised company policy that is distributed to all Genting Plantation's vendor list and making sure it is received and replied by the recipient.		

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Assessment Conclusion:	The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.
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Non-conformity			
NCR Ref #	1946100-202008-N2	Clause & Category (Major / Minor)	2.2.2 Minor
Date Issued	27/8/2020	Due Date	Next assessment
Closed (Yes / No)	No	Date of nonconformity Closure	NA
Statement of Nonconformity:	The evidence to meet the applicable legal requirements by a contractor was not adequately demonstrated.		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
Objective Evidence:	<p>It was found that employees of contractors did not have valid work permit as the following descriptions:</p> <ol style="list-style-type: none"> 1) One of the employees of Pengangkutan Yee Kiun is holding work permit under Genting SDC Sdn Bhd 2) One of the employees of Magtron Electrical Engineering Sdn Bhd does not hold any work permit. He only holds social visit. 		
Corrections:	<ol style="list-style-type: none"> 1. The mentioned workers will be brief regarding his work permit will not be renewed under Genting Plantation once expired, and will be the responsible of his employer, Pengangkutan Yee Kiun. 2. Mill Manager will conduct a re-briefing session with Chief Clerk on this requirement stated in the SP-MGR-12. A memo to Magtron Electrical Engineering Sdn Bhd will be issue for the mentioned worker to immediately stop work on the site. The contactor must get the proper work permit for the workers before continue working in GJOM site. GJOM will re-verified the work permit before the worker resume to work. 		
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Direct instruction from the plantation GM already received by GJBE to stop renewing contractor's worker work permit who is under Genting Plantation permit. Instruction received through email from GM on 01.10.2019. However, for this mentioned contractor worker, the renewal is sent out to the HQ away before the date of instruction from GM is received, renewal sent on 16.08.2019 to HQ. Hence, the work permit is renewed and expired on 26.11.2020. 2. Mill already have the procedure to ensure all the contractor workers have valid work permit as mentioned in System procedure SP-MGR-12 clause 7.3 (7.3.1). However, no monitoring done by the Person In-Charge (Chief Clerk) in GJOM management on this requirement. 		

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Corrective Actions:	<ol style="list-style-type: none"> 1. As instructed by plantation GM, GJBE will stop to renew any contractor’s worker work permit under Genting Plantation permit. 2. CC will do the monitoring and verify all the contractor’s workers document and permit before start any work in GJOM site as mentioned in SP-MGR-12 clause 7.3 (7.3.1). <p>This matter will be further verified during the next RSPO internal audit.</p>
Assessment Conclusion:	The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.

Non-conformity			
NCR Ref #	1946100-202008-N3	Clause & Category (Major / Minor)	3.5.1 Minor
Date Issued	27/8/2020	Due Date	Next assessment
Closed (Yes / No)	No	Date of nonconformity Closure	NA
Statement of Nonconformity:	The employment procedure is not available.		
Requirement Reference:	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.		
Objective Evidence:	The employment procedures for both foreign and local workers are not available.		
Corrections:	To conduct training regarding this procedure to the estate and mill PIC		
Root Cause Analysis:	The procedure is available but due to the estate PIC was not train regarding the procedure therefore unable to explain and provide evidence. The above requirements which is clearly stated in the SMP-GPB-32 page 25, Item 3.		
Corrective Actions:	Refresh training (annually) to be conducted to ensure competency level satisfactory		
Assessment Conclusion:	The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.		

Non-conformity			
NCR Ref #	1946100-202008-N4	Clause & Category (Major / Minor)	3.5.2 Minor
Date Issued	27/8/2020	Due Date	Next assessment
Closed (Yes / No)	No	Date of nonconformity Closure	NA

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Statement of Nonconformity:	The employment procedures are not implemented effectively.
Requirement Reference:	Employment procedures are implemented, and records are maintained.
Objective Evidence:	The employment procedure is not available, therefore is yet to be implemented.
Corrections:	To conduct training regarding this procedure to the estate and mill PIC
Root Cause Analysis:	The procedure is available but due to the estate PIC was not train regarding the procedure therefore unable to explain and provide evidence. The above requirements which is clearly stated in the SMP-GPB-32 page 25, Item 3.
Corrective Actions:	Refresh training (annually) to be conducted to ensure competency level satisfactory
Assessment Conclusion:	The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.

Non-conformity			
NCR Ref #	1946100-202008-N5	Clause & Category (Major / Minor)	7.11.3 Minor
Date Issued	27/8/2020	Due Date	Next assessment
Closed (Yes / No)	No	Date of nonconformity Closure	NA
Statement of Nonconformity:	There was no evidence that the adjacent stakeholders were engaged in developing the fire prevention and control measures.		
Requirement Reference:	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.		
Objective Evidence:	Genting Jambongan has drafted its fire prevention and control measures plan. However, there was no evidence that the adjacent stakeholders were engaged in developing it.		
Corrections:	Estate to identify the relevant/adjacent stakeholder and conduct briefing regarding this procedure.		
Root Cause Analysis:	The procedure was not communicated with the relevant stakeholders during the stakeholder meeting and no follow up action taken to inform regarding this procedure.		
Corrective Actions:	To include this procedure as an agenda during the stakeholder meeting.		
Assessment Conclusion:	The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.		

Opportunity for Improvements	
OFI #	Description
	Nil

Positive Findings	
PF #	Description
PF 1	Very good commitment and cooperation of the management team given to the assessment team.
PF 2	Many noticeable efforts in implementing the RSPO standard requirements can be seen during site visits.

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1776587-201904-M1	Clause & Category (Major / Minor)	2.1.1 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	10/7/2019
Statement of Nonconformity:	Some of the legal requirements were not effectively demonstrated.		
Requirement Reference:	Evidence of compliance with relevant legal requirements shall be available.		
Objective Evidence:	1. There was no linesite inspection carried out after 27/3/2019 for GJOM. 2. At GJBE, the line site inspection has been conducted on weekly basis however the report was not reflected as per actual situation during the site visit. 3. At GJBE, there was no approval from the Labour Department on salary deduction for replacement of damage tools. Sampled as follow: <ul style="list-style-type: none"> • Employee ID: E01690 - Feb 19, Mar 19 and Apr 19 pay slip. • Employee ID: E01615 - Feb 19 and Apr 19 pay slip 4. At GJOM, there was no approval from the Labour Department on overtime limit more than 104 hours/month. Verified the overtime record in punch card for Mohxxx.Suxxxx for Nov 18 and Dec 18.		
Corrections:	1. HA will produce a new weekly line site inspection schedule that will cover all estate and mill labour quarters in weekly basis and the new appointed HA assistant will be trained to conduct this inspection. 2. HA will conduct the line site inspection specifically as per the Line Site Inspection form produced. If happen to be a same situation occur, HA will need to come back to the particular line-site on next working day and completing the inspection before produce the complete inspection report. 3. GJBE will stop do any unpermitted salary deduction.		

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	4. GJOM to ensure overtime do not exceed allowable 104 hours by monitoring on weekly basis.
Root Cause Analysis:	<p>1. Due to the distance between line site and the HA didn't have a trained assistant to help conduct the inspection, the line site inspection conducted by HA did not cover all labour quarters in weekly basis and the current practice is one division line site per week.</p> <p>2. The HA conducted the line-site inspection and produce the report, however due to an emergency call from the office in that particular day, HA have to rush back to his clinic without completing the overall inspection.</p> <p>3. Application on salary deduction for replacement of damage tools not approved by the Labour Department for the current permit, however GJBE still continue to do the deduction due to no any instruction issued by top management to stop any unpermitted salary deduction.</p> <p>4. Application for extension of overtime limit not approved by Labour Department and due to the mill genset problem occurred during the affected month, the worker which is an engine driver, need to stand by for any problem to the mill genset during the mill process.</p>
Corrective Actions:	<p>1. HA together with his assistant will conduct the weekly line site inspection based on schedule produced. With this method, all line site will be inspected every week without miss. All the inspection report will be reviewed by Estate and Mill Manager.</p> <p>2. The line site inspection SOP will be reviewed to indicate specifically that any incomplete inspection on the current day must be continue at next day working. Reviewed SOP will be brief to HA.</p> <p>3. Notification to stop all un-permitted deduction will be issued by GM and HR.</p> <p>4. GJOM will come with weekly monitoring of OT and GJOM will resubmit the application for OT extension permit to JTK.</p>
Assessment Conclusion:	During the ASA 1 visit, visited the housing area and interview the occupants on the housing conditions. Hospital Assistant has conducted the weekly housing inspection and reflected the actual satisfactory condition. No deduction made for tools based on the pay slip review at GJBE and GJOM. Overtime was controlled below 104 hours/month. Hence, the corrective action plan on the previous Critical NC is deemed effective.

Non-conformity			
NCR Ref #	1776587-201904-M2	Clause & Category (Major / Minor)	6.5.2 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	10/7/2019
Statement of Nonconformity:	The inconsistency of worker's employment contract used and salary deduction made are not effectively demonstrated.		
Requirement Reference:	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.		

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Objective Evidence:	<p>1. There were 2 different version of employment contract sighted at GJOM (version 01.08.2016) and GJBE (version 01.12.2017).</p> <p>2. The calculation for 'EPF' and 'EPF Tambahan' deduction on VLP in April 2019 were inconsistent. Sampled below:</p> <ul style="list-style-type: none"> • GJBE (Worker ID: E01679), VLP: RM 141.52, EPF Tambahan: RM 15.00. • GJOM (Worker ID: E00048), VLP: RM 424.56, EPF Tambahan: RM 46.00. • GJOM (Worker ID: E00034), VLP: RM 448.46, EPF Tambahan: RM 51.00. <p>3. The piece rate workers (GJBE - Worker ID: E01295 and Worker ID: E01459) did not aware on the annual leave entitlement as per their employment contract. In 2018, all their leaves taken are treated as absent although they were entitled for it.</p>
Corrections:	<p>1. GJOM will update all workers contract to the latest version.</p> <p>2. Training on the EPF calculation will be provided to the office clerk. Current calculation is correct.</p> <p>3. GJBE will do a refresh briefing to all workers regarding their signed worker agreement so that workers will always remember and know their privilege as stated in the agreement including the entitlement of paid annual leave.</p>
Root Cause Analysis:	<p>1. Due to miscommunication between GJOM and HR regarding the latest worker contract agreement, GJOM did not update all the workers contract to the latest version which is version 01.12.2017.</p> <p>2. The calculation is correct as per the Jadual Ketiga, Kadar Caruman Bulanan by KWSP. However, the office clerk failed to explain clearly to auditors during the audit.</p> <p>3. GJBE did not do or scheduled any refresh briefing regarding the worker's agreement to all workers. Both of sampled workers did not apply for any annual leave in 2018, based on the Genting Plantations Perjanjian Pekerjaan Clause No. 17 quoted "Masa pengambilan cuti tahunan ini adalah melalui permohonan dan kelulusan oleh pihak majikan". The workers are entitled for annual leave but they have taken their leave without any leave application and approval by the estate management, hence all their leaves taken are treated as absent.</p>
Corrective Actions:	<p>1. Renewal of worker's employment contract will be implemented to all workers regardless of their contract expiry (3 years).</p> <p>2. Briefing by the CC to all check roll clerk on the method of EPF calculation based on Jadual Ketiga, Kadar Caruman Bulanan KWSP, will be scheduled every 6 months. All briefing will be documented. This briefing also will be done to new appointed check roll clerk (if any).</p> <p>3. GJBE will include this briefing in Annual Training Plan and this briefing will be done twice a year, every 6 months and recorded.;</p>
Assessment Conclusion:	<p>During ASA 1 visit, sighted the employment contract is using the current version of 01.12.2017. EPF contribution were calculation correctly as per Jadual Ketiga and pay slip sampled in clause 6.2.2 showed correct calculation. The workers also interviewed during the housing inspection visit showed that their understand on annual leaves entitlements. Hence, the corrective action plan on the previous Critical NC is deemed effective.</p>

Non-conformity

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NCR Ref #	1776587-201904-N1	Clause & Category (Major / Minor)	2.1.3 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	27/8/2020
Statement of Nonconformity:	The mechanism for ensuring compliance was not effectively implemented		
Requirement Reference:	A mechanism for ensuring compliance shall be implemented		
Objective Evidence:	<p>The assessment done by the management for ensuring compliance was not capture the non-compliance as follow:</p> <ol style="list-style-type: none"> 1. No Boilerman 1st Grade at GJOM as commented by DOSH Officer (visit on 5/3/2019) and required by regulation. 2. No visiting engineer at Genting Jambongan Oil Mill 3. The current competency for electrical charginan (Grade: AO) was not accordance with the act. 4. Contravene of license (CL), refer to compliance schedule, LP/PUB2014/S/12/013777 validity period (13/9/18-30/6/18). For the new license period (01/07/2018-30/06/19), no evidence to show that CL has been obtained to contravene clause 16 of Jambongan Oil Mill's compliance schedule (004843) 		
Corrections:	<ol style="list-style-type: none"> 1. Current boilerman will be sent for any 1st grade Boilerman test held after 18 October 2019. 2. Obtain more contact of VEE available and negotiate to visit Jambongan Mill. 3. The current charginan will be registered for the competency course in this year. Alternatively, to advertise on the position through banner and/or online channel. 4. Apply for the CL for this year starting June 2019. 		
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Boilerman (Mohammad Subala) had obtained 2nd grade on 18 April 2018. To take the 1st grade test, he needs to go through retention period of 18 months before he can sit for the test. The retention period will end on 18 October 2019. 2. GJOM Location and security concern by VEE caused them to not willing to visit Jambongan Oil Mill. 3. Current charginan not able to find available part time course for A4 competency through Institut Latihan Perindustrian (ILP) and difficult to find Grade A4 charginan. 4. No monitoring by GJOM personnel regarding the expired CL hence no application for renewal is issued for the new CL. 		
Corrective Actions:	<ol style="list-style-type: none"> 1. To ensure the boilerman complete the 1st Boilerman Grade test and get the competency. 2. Provide good accommodation and arrange for security escort once able to confirm visit by VEE. 3. To ensure the charginan complete the full competency course until obtain competency for A4. 4. To ensure GJOM get the new CL and as DOE has approved off the construction, company will proceed for the construction of the ESP. 		
Assessment Conclusion:	<ol style="list-style-type: none"> 1) The mill has appointed new 1st grade boilerman with competency permit no. SB/14/EIS/01/5 issued 14/5/2014 as per appointment letter dated 17/7/2020 2) Visiting Electrical Engineer, IPC Engineering Sdn. Bhd. visit the estate on monthly basis. Sighted the visit records recorded in logbook dated 31/1/2020, 26/2/2020 and 10/6/2020. The VEE submit the "Perakuan Pemeriksaan, 		

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	<p>Borang I, Akta Bekalan Elektrik 1990, Peraturan 68" to Energy Commission. Sighted the submission dated 29/2/2020 and 31/1/2020.</p> <p>3) The mill have submitted the application to the Suruhanjaya Tenaga for current chargeman with AO competency to undertake the "Kursus Pejabat Jentera Terhadap Kategori A4" on 10/2/2020 and Energy Commission has replied that the application letter on 17/2/2020. However, the Energy Commission has yet to invite the chargeman to attend the course.</p> <p>4) Current CL validity period is from 11/6/2019 to 30/8/2020. Application for renewal has been done in 17/5/2020 and pending for approval from the DOE.</p>
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Opportunity for Improvement	
OFI#	Description
	Nil

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1776587-201904-M1	Major	2.1.1	16/05/2019	Closed out on 10/07/2019
1776587-201904-M2	Major	6.5.2	16/05/2019	Closed out on 10/07/2019
1776587-201904-N1	Minor	2.1.3	16/05/2019	Closed out on 27/08/2020
1946100-202008-M1	Critical	4.1.1	27/08/2020	Closed out on 30/10/2020
1946100-202008-N1	Minor	1.2.1	27/08/2020	Open
1946100-202008-N2	Minor	2.2.2	27/08/2020	Open
1946100-202008-N3	Minor	3.5.1	27/08/2020	Open
1946100-202008-N4	Minor	3.5.2	27/08/2020	Open
1946100-202008-N5	Minor	7.11.3	27/08/2020	Open

3.5 Stakeholders and previous land owner / user 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 Jambongan 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

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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.

List of Stakeholders contacted	
Internal Stakeholders Estate and mill workers Gender Committee	Union/Contractors/Communities Klinik Kesehatan Jambangan SK Jambangan Ketua Anak Negeri, Kampung Hujung Contractors/Vendors/Suppliers Bahagia Jaya Plantation Sdn Bhd
Government Departments Jambangan Island Police Officer JTK Officer, Sandakan	NGO Nil

Stakeholders comment	
IS #	Description
1	<p>Feedbacks: <u>Klinik Kesehatan Jambangan</u> Nurses has no issue with Genteng management since Genteng provide transport for nurses to go to estate for appointment with pregnant workers. Vaccination and health screening have been conducted regularly. They would like to extend their appreciation to the management for the fast action on their request for clean water supply.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No further issue.</p>
2	<p>Feedbacks: <u>SK Jambangan</u> There is no foreign worker’s children study in SK Jambangan. However, if the parents have a valid document, they can always register their children by fill in the form in school and it will be submitted to PPD for approval first. If approved, the children can register in SK Jambangan. Management also give contribution on the clean water request to school and active PIBG participation.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No further issue.</p>
3	<p>Feedbacks: <u>Jambangan Island Police Officer</u></p>

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	<p>So far, the security in Jambongan Island is under controlled. The patrolling on island was conducted continuously and they were having a good cooperation with the Royal Army Malaysian team in the island. In the past 17 years of services, there is no encroachment or major issue case in Jambongan Island.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No further issue.</p>
4	<p>Feedbacks: <u>Ketua Anak Negeri – Kampung Hujung.</u> Management has contributed on the clean water and water tanks to the villagers in Jambongan Island. Apart from that, the road maintenance, culvert installation and job opportunity also provided by both Genting Jambongan Oil Mill and Genting Jambongan Estate. No customary land within Genting Estate and they have a good relationship with the villagers.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No further issue.</p>
5	<p>Feedbacks: <u>JTK Officer-Sandakan</u> Clarification has been made to the Officer through telephone on the duration of employment for local worker is made 3 years and extendable, same with foreign workers.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No further issue.</p>
6	<p>Feedbacks: <u>Contractors/Transporters/Vendors/Suppliers</u> Agreement was signed, and payment was made within the timeframe. No complaint from the contractor worker.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No further issue.</p>
7	<p>Feedbacks: <u>Gender Committee</u> Meeting were conducted regularly together with the new mother’s need assessment. So far, there is no sexual harassment case reported.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No further issue.</p>
8	<p>Feedbacks: <u>Neighbouring Estate (Bahagia Jaya Plantation Sdn Bhd)</u> The estate border was clearly marked and no encroachment. No wildlife hunting in their estate and so far they haven’t seen any rare, threaten and endangered species within Jambongan Island.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No further issue.</p>

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List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil					
<p>Note: There are 597 land titles registered under Native Title. All the titles are registered under a name (Intan Binti Angkung). The lands were acquired by Genting through registration of sublease to Genting SDC Sdn. Bhd. in stages between 2004 to 2014.</p>					

Previous land owner / user comment	
	Feedbacks:
	Management Responses:
	Audit Team Findings: NA

3.6 Impartiality and conflict of interest

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

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides 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	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Jambongan Oil Mill and Genting Jambongan Estate has implemented Enquiry Register Book to record all the requests from the stakeholders. The company has issued a memo with a list of documents that could be requested by the stakeholders dated 4/4/2017. Among the documents and records that can be requested such as policies, SEIA reports, stakeholder meeting minutes, internal and external audit reports, management plans and procedures such as complaint and grievances, sexual harassment and negotiation and compensation. The stakeholders have been informed about their as stakeholders during the last stakeholder meeting which was conducted on 28/7/2020. Interview with the stakeholders such as contractors, local communities and workers confirmed that they are aware of and understand that they have rights to participate in the decision making. Since the last assessment, there was no request for any documents from any stakeholders.</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>The unit of certification has no restriction to provide any information according to the standard guidance. All the information is available in English or Bahasa Malaysia or both languages and will be provided by the certification unit upon request.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p><u>Jambongan Mill:</u> Sustainability Management Procedure for Consultation and Communication; SMP-GPB- 17; Rev. 02; Date: 23/02/2018.</p>	Complied

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		<p>Consultation & communication done through meetings, dialogs, engagement to both internal & external stakeholders and recorded in Genting Plantations Complaints/Grievance Record Book – Mill: GJOM. Sighted latest complaints received by external stakeholder (DOE Sandakan branch) (ref. #034). Mill to monitor the process from decanter cake and FFB shred to compost plant will not cause pollution, always maintain leachate pit no 1 and alarm at boiler.</p> <p><u>Jambongan Estate:</u> Sustainability Management Procedure for Consultation and Communication; SMP-GPB-17; Rev. 02; Date: 23/02/2018 and Sustainability Management Procedure Manual for Complaints & Grievances, Doc No: SMP-GPB-19, Rev: 03, Dated 21/03/2018 is available for complaint and grievances process available during the audit. Consultation & communication and complaint/grievance process were implemented through meetings, dialogs, engagement to both internal & external stakeholders and recorded in Genting Plantations Complaints/Grievance Record Book – Estate: GJBE. Sighted latest complaints received by internal stakeholder (ref. #020; dated 05/08/2020) on request to damage door repair at (Puan Nurlina, Puan Roseyati and Cik Saemah’s houses). No any external complaints/grievances received from external stakeholder.</p> <p>Other than that, the Sustainability Management Procedure Manual (Doc No: SMP-GPB-25 Rev 00, dated 14/08/2014) for information request is kept inside the enquiry register book.</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"> • Sustainability Policy; Rev. 00; Date: 3/8/2009 	
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		<ul style="list-style-type: none"> • Occupational Safety & Health Policy Date: 01/7/2018 • Environmental Policy; Rev. 00; Date: 5/10/2009 • People Policy; Rev. 00; Date: 3/8/2009 • Sexual Harassment Policy; Rev. 00; Date: 3/8/2009 • Zero Burning Policy; Rev. 00; Date: 10/8/2011 • Food Safety Policy; Rev. 00; Date: 2/2/2010 • Whistleblower Policy; Rev. 00; Date: 4/4/2013 • MSPO Policy; Rev. 00; Date: 18/3/2014 • Policy on Ethical Conduct and Integrity; Rev. 00; Date: 22/6/2015 • Social Policy (Incorporating Special Labour and Human Rights requirements); Rev. 00; Date: 22/6/2015 <p>All policies were available in dual language (BM & English) and signed Genting Plantations Berhad President & COO.</p>	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>The process implemented based on Sustainability Management Procedure for Consultation and Communication; SMP-GPB-17; Rev. 02; Date: 23/02/2018. Consultation & communication done through meetings, dialogs, and engagement to both internal & external stakeholders. Any complaints or grievances recorded in Genting Plantations Complaints/Grievance Record Book.</p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>GJOM & GJBE: Genting SDC Sdn Bhd: Genting Jambangan Oil Mill List of stakeholders updated on 05/08/2020 for GJOM and on 22.07.2020 for GJBE.</p> <p>Latest stakeholder meeting was conducted on 28/07/2020 attended by 22 people for stakeholders within Jambangan Island. The stakeholder meeting was conducted combined with mill and estate. Meeting attended by village representatives, school teacher, supplier's representative and suppliers.</p>	Complied

Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	The Ethical Conduct and Integrity Policy signed by President & COO dated 22/06/2015 and it was communicated to the stakeholders including contractors and third party during the stakeholder meeting on 28/07/2020 (GJBE). Other than that, contractors & labour agent have signed the Addendum to Contract Agreement Contract No: GJBE/Compost/20/06/06 and Code of Business Conduct for Third Parties as below: <ol style="list-style-type: none"> 1. GJBE: Syarikat Raihan Jaya dated 11/06/2020. 2. GJOM: Hai Heng Enterprise Sdn Bhd daed 01/05/2019. 3. GJOM: Magtron Electrical Engineering Sdn Bhd dated 25/09/2018. However, recruitment agency (Agensi MNK) has yet to sign the Addendum to Contract Agreement and Code of Business Conduct for Third Parties.	Non-compliance
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Anti-Bribery & Corruption Policy as well as Code of Business Conduct for Third Parties established were signed by both contractor & internal employees. It is also been checked in the internal audit by Sustainability Team.	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	GJBE The estate had continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Estate had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were:	Complied

		<ol style="list-style-type: none"> 1. MPOB License no. 509406502000, valid till 30/11/2020. 2. Private Installation license, no.: <ol style="list-style-type: none"> a. 2020/01343 valid till 7/7/2020 b. 2020/01344 valid till 25/7/2021 c. 2020/01346 valid till 25/7/2021 d. 2020/01800 valid till 13/8/2021 e. 2020/01345 valid till 25/7/2021 3. Certificate of fitness (CF) no. for air receiver: <ol style="list-style-type: none"> a. SB PMT 13039 valid till 4/11/2021 b. SB PMT 15087 valid till 4/11/2021 4. Diesel permit no. S002459 valid till 8/6/2021 5. Petrol permit no. S003410 valid till 13/12/2020 6. Permit to land / load goods at a place other than a valid landing place, permit no. KE.SB(05)381/02-237(07) valid till 15/10/2020 <p>GJOM</p> <p>The mill had continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Estate had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were:</p> <ol style="list-style-type: none"> 1. DOE License no. 004843 with Compliance schedule no. ASSH(B)31/152/000/185 valid till 30/6/2021 2. DOE Contradiction License no. 005162 Compliance schedule no. ASSH(B)31/152/000/185 valid till 30/8/2020 3. MPOB license no. 587904004000 valid till 31/7/2021 4. Diesel permit no. S00226 valid till 2/8/2021 	
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		<ol style="list-style-type: none"> 5. Petrol permit no. S00226 valid till 2/8/2021 6. Private Installation license, no. 2020/01131 valid till 20/5/2021 7. Permit to employ non-residence no. JTK.H.SDK.600-4/1/1/10401/0007217 valid till 17/5/2021 8. Weighbridge permit for equipment no. 193850143 and 133750576 with security sticker no. 2.1KQ.017015 and 2.1KQ017016 dated 12/11/2020 9. Competent person <ol style="list-style-type: none"> a. New appointed 1st grade engine driver with competency permit no. SB/14/EIS/01/5 issued 14/5/2014 as per appointment letter dated 17/7/2020 b. AESP for confined space - NW-AE-0001-P valid till 10/3/2021 c. Scheduled Waste Competent Person cert. no. CePSWaM/02986 	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>The relevant laws were listed in Master List of Legal Requirements and best Practices Applicable to Plantation Operation in Malaysia updated 14/7/2020 including latest laws applicable i.e Prevention and Control of Infectious Disease Act 1988.</p> <p>A mechanism for tracking changes in law is guided by SMPM Procedures on Regional, National and International Laws, document no. SMP-GPB-21, rev. 1, 14/8/2014. Generally the mechanism is by monitoring or consultation with various sources (e.g. government agencies, electronic & non-electronic media, legal firms, professional bodies, industry association/organization and NGO). The Genting's Systems, Methods, Insurance and Risk Management Department (based in KL) is the person responsible to handle the task.</p>	Complied

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2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>The Estate has maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers the estate visited confirmed that they were clearly marked and maintained.</p> <p>Sighted during site visit at the Field 71 adjacent with Kg. Melalin and Field 76 adjacent with kg. Limau Limau, the legal boundary are clearly demarcated with fire belt and 2" G.I pipe with 5 feet height colored in red.</p>	Complied
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>List of all contracted parties were maintained in the operating units' stakeholder list. The latest list was updated in July 2020.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>Based on samples of three contractors [Pengangkutan Yee Kun, Syarikat C.M., Syarikat Raihan Jaya, Sarawanan a/l Periasamy and Hai Heng Enterprise Sdn Bhd (carrier provider)], the requirements to comply with applicable laws are stipulated in the contract agreements under Clause 2 and 3. Among the applicable laws mentioned are OSHA, EQA, FMA to name a few.</p> <p>Engagement of contract works and purchasing is guided by procedures namely:</p> <ul style="list-style-type: none"> i) Procedural Instructions: Tender Procedures PLA 02, dated 15/1/2013 ii) Procedural Instructions: Contract Works PLA 04, dated 15/1/2013 <p>The procedures outlined the process of awarding contracts and the establishment of system of various contracts and set guidelines for control on the execution, processing and payment of contract works.</p>	Non-compliance

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		<p>Nonetheless, it was found that employees of contractors did not have valid work permit as the following descriptions:</p> <p>3) One of the employees of Pengangkutan Yee Kiun is holding work permit under Genting SDC Sdn Bhd</p> <p>One of the employees of Magtron Electrical Engineering Sdn Bhd does not hold any work permit. He only holds social visit.</p> <p>Thus, a non-conformity report was assigned due to this lapse.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>Clauses disallowing child, forced and trafficked labour are covered under Clause 2.5 D of the contract agreement. Based on the employee's database and interview with workers, there was no evidence of child labour, forced and trafficked labour being practiced by the operating units.</p>	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>There is only one third party FFB supplier for Jambongan POM i.e. Bahagia Jaya Plantation Sdn Bhd. The mill has</p> <ul style="list-style-type: none"> - The information about the number of land titles including the title no. and hectarage. The mill is in the process of obtaining the supporting documents for the claim from the supplier. Currently, 19 of 69 titles have been obtained. Some samples of the titles were verified i.e. #083074873, 083074668, 083074659 & 083074640. - The information about the geo-location of its office through obtaining a copy the supplier's MSPO certificate - A copy of the supplier's MPOB license 	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>There is no indirect FFB supplier supplying to Jambongan oil mill.</p>	Complied

Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The estate has established a business plan and documented in the Summary of Expenditure – Projection for Year 2021 to 2024. The business plan stated the:</p> <ul style="list-style-type: none"> a. Crop Projection b. Mature Upkeep Cost c. Manuring Cost d. Harvesting Cost e. Transport cost f. General Charges g. Capital Expenditure <p>The Mill budget component comprises of the following;</p> <ul style="list-style-type: none"> a. FFB processed / CPO/CPK production b. General Charges <ul style="list-style-type: none"> • Supervision/Office & admin expenses • Indirect labour c. Processing d. Despatch <p>The business plan comprises established for 2021-2024.</p> <ul style="list-style-type: none"> a. Crop intake. b. Processing cost RM/mt c. Extraction rates. d. CAPITAL expenditures. 	Complied
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>No replanting program has been established for the next 5 years as the oldest palm is only 16 years old planted in 2004.</p>	Complied

<p>3.1.3</p>	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -</p>	<p>Management Review procedure was established accordingly, refer to Sustainability Management Procedure Manual: Management Review. Refer document no. SMP-GPB-06, rev. 2, dated 23/7/2019. In the SOP established, the Management Review to be conducted at least once year. Latest management review meeting was conducted on 6/5/2019. The management review discussed on:</p> <ol style="list-style-type: none"> 1. Status of outstanding issues from previous meetings 2. Changes, improvement or modification of the Sustainability Management System 3. Internal and External audit findings on Sustainability management System 4. Complaints and grievances book 5. Enquiry register book 6. Stakeholder meeting reports/minutes 7. Risk Management 8. Green-house value 9. Review continual improvement status and its recommendation 10. Review on resources and training requirement 11. Review on sustainability policy and its objective status 12. Review on effectiveness in achieving quality, environmental, social, safety and health objectives 13. Compliance status on legal and other requirements 14. Any other matters 15. Preventive and corrective actions 16. Recommendation for improvement 17. Result of internal audit 18. Customer feedback 19. Follow up actions from management review 20. Changes that could affect the management system 	<p>Complied</p>
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		<p>FY 2020, the management review meeting was postponed due to Malaysian Movement Controlled Order and to be conducted in September 2020.</p>	
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -</p>	<p>Addressed in SMPM Procedures for Continual Improvement of Sustainability Management System (RSPO/MSPO/ISCC). The Continuous Improvement Plan dated 28/7/2020 was available for verification. Among the action plans established were:</p> <ol style="list-style-type: none"> 1. Minimize use of certain pesticides <ol style="list-style-type: none"> a. Mainly targeted at usage of highly toxic pesticides b. Expend IPM program 2. Environment Impacts <ol style="list-style-type: none"> a. Regular monitoring of water quality b. Minimise soil erosion c. Conserve HCV areas and riparian buffer zone 3. Waste reduction <ol style="list-style-type: none"> a. Maximizing recycling and minimizing waste or by-products generation 4. Pollution and greenhouse gas emission <ol style="list-style-type: none"> a. Pollution prevention/mitigation plan drawn up based on identified waste and pollutants b. Improve conditions of tractors 	<p>Complied</p>

		5. Social impacts a. To improve interior and exterior of workers quarters	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>There's no submission made by Genting Plantations of RSPO metrics template yet, pending its availability by RSPO secretariat. Latest submission of Annual Communications of Progress (ACOP) done for year 2019 available as in RSPO website link as following: https://document.rspo.org/Genting_Plantations_Berhad_ACOP2019.pdf</p>	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>The estate operations are guided by the following manuals.</p> <ol style="list-style-type: none"> 1. Genting Plantations Oil Palm Manual OPM issued on 9/11/99 updated August 2013. 2. Land preparation/nursery/planting/soil conservation/ 3. Pest & Disease/weeding/fertiliser application/harvesting 4. Managing difficult soils/crop forecast 5. Sustainability Management Procedure Manual 1/8/13 revised in 7/2/19. 6. OSH Manual dated 1/1/2010. 7. Environmental Control Procedure – 01/9/2018 8. Store Operating Manual – 2014 9. Standard Operating Procedure Malaysia Estates rev 2 (Dec 10) rev 3 (Oct 13) 10. Jobs description - 2012 	Complied

		<p>The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections</p> <ol style="list-style-type: none"> 1. OPM No 7. Manuring of oil palm 2. OPM no 13. Managing difficult soils <p>The procedures as documented in the manuals and SOPs were disseminated to the staff/workers through morning briefings and trainings. The manuals are kept in the main office for references of employees particularly for the supervisory personnel.</p>	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	Genting Plantations Berhad has established mechanism to monitor the implementation of their procedure by visit from Group Plantation Advisory, Agronomist and Sustainability Department.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<p>The CU visited maintained all records of visit and monitoring and available at the office for review. Sighted the sampled records as follows:</p> <p>Visit from Group Plantation Advisory (GPA) reports were made available during the visit. Noted reports observed for visit carried out on 29/11/2019. The report covered on replanting and immature area. No major issue was raised during the visit.</p> <p>Latest visit by agronomist was conducted on 11/10/2019 as per report in email dated 1/11/2019. The visit was to follow up from previous visit conducted on 5/3/2019.</p>	Complied
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected	The SIA for Genting Jambongan Estate and Genting Jambongan Oil Mill dated 31/03/2019 established by Sustainability Department.	Complied

	<p>stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Identification of environmental impact was done by having the internal environmental aspect and impact assessment and also through the Proposal for Mitigation Measure (PMM). The PMM was conducted by a licensed consultant in August 2014 for development of 496.56 Ha [report no.: CK/EV406-4022/14].</p> <p>Internally, the certification unit has also carried out the identification of environmental aspect and impact through utilisation of a format. The evaluation was last reviewed in February 2020. Among the activities covered were field maintenance, harvesting & evacuation, handling of agrochemicals, fuel, oil & lubricants, transportation, maintenance of machinery & vehicles and wastes management to name a few.</p>	
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <ul style="list-style-type: none"> - Minor Compliance - 	<p>The SIA were developed with the participation of workers, villagers, contractors and etc.</p> <p>Among the groups consulted were</p> <ul style="list-style-type: none"> - local workers - foreign workers - workers representative - old, young and middle-aged workers/residence - contractors & suppliers - villagers (e.g. Kg Limau-limau, Kg Malalin, Kg Hujung, Kg Bahanan) - smallholders - shop. school, etc. - government officers (e.g. Auxiliary Police, SK Jambangan, Pegawai Anak Negeri, Energy Commission, DOSH) <p>Key areas identified in the SIA were on economic livelihood/quality of life, environment, health & wellbeing, and community & families.</p>	<p>Complied</p>

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		<p>Based on the PMM’s agreement (“Surat Akujanji”) between Genting SDC Sdn Bhd and Environmental Protection Department [ref.: JPAS/PP/02/600-1/11/1/229, dated 11/1/2016], the estate has to conduct the Environmental Monitoring & Compliance Audit twice a year. The last audit was conducted on 14/1/2020 [report no.: CK/MO411/1035-1/20] by a licensed consultant. According the report, the estate has complied with all the criteria in compliance schedule stipulated in the agreement. Among the criteria evaluated were:</p> <ul style="list-style-type: none"> - Control of development site - Water source quality - River protection - Soil erosion and silt sedimentation - Development of oil palm plantation by phase - Grease and toxic waste - Solid and biomass wastes - Sewerage/Liquid waste - Air quality and fire control - Completion of project <p>Mill</p> <ul style="list-style-type: none"> - FFB sterilizer - Thresher - Press station - Kernel plant - CPO clarification - Boiler operation 	
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		<ul style="list-style-type: none"> - Engine room - Laboratory - CPO storage tanks - Workshop - Dispatch of CPO & PK using barge 	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The SIA monitoring plan were developed annually with on-going and continuous plan. GJOM has produced the social management and monitoring plan dated 12/08/2020 incorporated the SIA, list of stakeholders, internal stakeholder, complaints and grievances, etc.</p>	Complied
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>The employment procedures for both foreign and local workers are not available.</p>	Non-compliance
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>The employment procedure is not available, therefore is yet to be implemented.</p>	Non-compliance
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has established the SOP for risk assessment to identify H&S issue documented in the Occupational Safety and Health Manual under section Hazard Identification, Risk Assessment and Risk Control – HIRARC. Refer document no. OM-GPB-07 dated 1/1/2020.</p> <p>The risk assessment process has been describe in the SOP accordingly. As per SOP, HIRARC review to be conducted as follows:</p>	Complied

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		<p>i. Once a year for activity with accident occurrence ii. Instructed by DOSH or Safety and health Officer iii. Changes in operations GJBE</p> <p>The estate has conducted safety and health assessment for all operations and documented in Hazard Identification, Risk Assessment and Risk Control register. The HIRARC was reviewed at minimum of once a year and when necessary. Review was conducted by the Asst. Manager. FY 2020 review was conducted on 1/7/2020 for accident occur in manual manuring and 3/7/2020 for accident occur in harvesting operations.</p> <p>GJOM</p> <p>The HIRARC was reviewed at minimum of once a year and when necessary. Review was conducted by the Mill Manager and ESH Committee. Latest review was conducted on 10/8/2020 for workshop operations.</p> <p>Additionally, Genting Plantations has established HIRARC for Covid-19 dated 19/3/2020.</p> <p>Noted during site visit at the estate and mill, the mitigation plan stated in the HIRARC review has been implemented.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>GJBE</p> <p>The estate has established the H&S plan documented in Safety and Health Management Plan 2020 dated 6/1/2020. The plan cover main activity areas i.e. Agrochemicals on Plantations, Oil Palm Harvesting Operations, Machine Operator, FFB lorry drivers, vehicle driving/machine handling, workshop operation, usage of</p>	Complied

		<p>PPE and thorn prick. The estate has allocated budget for the H&S plan.</p> <p>Sighted the implementation of the management plan as follows:</p> <ul style="list-style-type: none"> i. Latest CHRA has been conducted by assessor with reg. no. HQ/07/ASS/00/236 on 8/4/2019 – 31/10/2019. Refer report no. JKPP HQ/07/ASS/00/236-2019/157. ii. The estate monitored the condition of machine/vehicles on daily basis by the machinery/tractor operator and field supervisor. Sighted the monitoring records for tractor LD-02, LD-04 and LD-19 for the month of May, June and July 2019. iii. The estate conducted medical screening for chemical handler on monthly basis by Hospital Assistant. Sighted the Summary-Check Up Spray/Manuring for the month of June and July 2020. <p>GJOM</p> <p>The mill has established the H&S plan documented in Safety and Health Management Plan 2020 dated 10/2/2020. The plan cover main activity areas i.e General, Mill Compound, Mill Operation, Power Plant, Water treatment, Compost Plant, Workshop operation, and vehicle running. The mill has allocated budget for the H&S plan.</p> <p>Sighted the implementation of the management plan as follows:</p> <ul style="list-style-type: none"> i. Latest audiometric test was conducted on 23/12/2019 by competent assessor with reg. no. HQ/18/PEB/00/00024. 16 workers were for test with 1 workers were found with hearing impairment. The JKPP 7 were submitted by the OHD on 29/12/2019. ii. Medical surveillance was conducted on annually basis. Latest surveillance was conducted on 29/11/2019 and 4/3/2020. 4 	
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		workers were send for surveillance and found fit to work as chemical handlers. iii. Latest CHRA has been conducted by assessor with reg. no. HQ/11/ASS/00/290 on 10/112/2019. Refer report no. RSSB/CHRA/2019-156.	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The mill and estate conducted training need analysis to identify training required for the employee and documented in QMS Training Plan. The analysis covers the Proposed Person to Attend, Designation, Intend Scope of Training, Rationale of Training Planned, Date and Trainer.</p> <p>The mill and estate has established training program FY 2020 base on training need analysis conducted. The training program covers operation SOP, OSH training and wellness, sustainability training and awareness and Covid-19 pandemic control.</p> <p>The program involve the executive, staff/field supervisor, workers and contractors. The identified training was programmed throughout the year.</p> <p>The mill and estate has also conducted assessment to the training attendees to assess the training efficiency.</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The mill and estate maintain the training records for all employees. Sighted the training records as follows:</p> <p>GJBE</p> <ol style="list-style-type: none"> 1. Harvesting training dated 11 – 12/2/2020, 4/5/2020 and 2/7/2020 2. Manuring training dated 11 – 15/2/2020, 1/4/2020 and 24/6/2020 	Complied

		<ol style="list-style-type: none"> 3. Spraying training dated 12 – 12/2/2020, 17/3/2020 and 4/5/2020 4. Working at height training dated 14/8/2020 5. Tractor driver training dated 19/6/2020 6. Compost application training dated 18/6/2020 7. Rat baiting training dated 21/7/2020 and 27/6/2020 8. Calibration pump and spray dated 17/3/2020 9. First aid training dated 4/5/2020 and 22/6/2020 10. Fire drill training dated 27 & 29/7/2020 and 12 & 13/8/2020 11. PPE training dated 17/3/2020 12. Triple rinse training dated 17/3/2020 13. Emergency Response Plan training dated 17/3/2020 14. Contract Agreement Awareness training dated 12/6/2020 15. Covid-19 awareness briefing dated 12/3/2020 <p>GJOM</p> <ol style="list-style-type: none"> 1. Permit to Work training dated 2/6/2020 2. HIRARC and SOP - Process refresher training dated 1/6/2020 3. HIRARC and SOP – Laboratory and Water Treatment refresher training dated 1/6/2020 4. HIRARC and SOP – Weighbridge refresher training dated 1/6/2020 5. HIRARC and SOP – Boiler and Engine Room refresher training dated 1/6/2020 6. HIRARC and SOP – Workshop refresher training dated 1/6/2020 	
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		<ul style="list-style-type: none"> 7. HIRARC and SOP – Electrical refresher training dated 1/6/2020 8. HIRARC and SOP – Compost Plant refresher training dated 1/6/2020 9. QMS/ESH Policies and Objective, Target and Program refresher training dated 22/1/2020 10. New workers Safety, ESH, Induction, RSPO and MSPO awareness training dated 17/8/2020 11. Schedule waste management training dated 6/7/2019 12. Chemical management training dated 1/8/2019 	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>There was a training on traceability and supply chain conducted on 10/7/2020 and 25/7/2020 by the Genting’s sustainability department. The training was attended by 5 key personnel such as the mill manager, mill engineer, admin clerks and weighbridge operators.</p>	Complied
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	NA	Not Applicable

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<p>3.8.2</p>	<p>Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. 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 Jambongan Oil Mill receives and process both certified and noncertified FFB (93% own estate and 7% outsider). Therefore, it uses the Mass Balance supply chain system and module. During the P&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>	<p>Complied</p>
<p>3.8.3</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification 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.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in Table 10 of this public summary report.</p>	<p>Complied</p>
<p>3.8.4</p>	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>Based on verification of transaction records extracted from RSPO Palmtrace, the registration and reporting requirements found to be met.</p>	<p>Complied</p>
<p>3.8.5</p>	<p>Documented procedures The mill 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: a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) 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</p>	<p>Supply Chain and Traceability (Mill) Procedure, Doc. No. SMP-GPB-23 dated March 2020 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: - Incoming Inspection (Direct Material), Doc. No. PM-PRD-04 dated 2/1/2018 - Product Identification & Traceability, Doc. No. PM-PRD-01 dated 2/1/2018 - Handling, Storage, Preservation and Delivery, Doc. No. PM-LAB-03 dated 2/1/2018 - Internal Audit, Doc. No. SMP-GPB-03, Rev. 04 dated</p>	<p>Complied</p>

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	<p>to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>25/5/2018</p> <ul style="list-style-type: none"> - Management Review, Doc. No. SMP-GPB-06, Rev 01 dated 25/5/2018/2018 - Production Planning & Scheduling, Doc. No. PM-PRD- 03 dated 2/1/2018 <p>The Mill Manager to appoint responsible employees to implement and maintain the Supply Chain and Traceability System. Office Clerk has been appointed as the person-in-charge for Supply Chain, Traceability and Mass Balance requirements of RSPO, ISCC and MSPO Sustainability Standards. Interview with the PIC showed that she was able to demonstrate the implementation of their procedures in accordance to the standard.</p>	
<p>3.8.6</p>	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Genting has developed Sustainability Internal Audit, Doc. No.: SMP-GPB-03, Rev. 04 dated 25/5/2018 for conducting RSPO SCCS and RSPO Rules on Market Communications and Claims internal audit.</p> <p>The last internal audit was carried out on 4-5/8/2020 by an internal auditor sourced from Genting's office in Sandakan. The coverage of internal audit has included the General Chain of Custody Requirements for the Supply Chain and Module E: Mass Balance. There was no non-conformity raised as a result of the internal audit.</p>	<p>Complied</p>
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</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, date of delivery, field number, number of bunches. Upon arrival at</p>	<p>Complied</p>

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	<ul style="list-style-type: none"> ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate's ticket number is recorded in the mill's ticket number.</p> <p>There has been no projected overproduction. Nonetheless, based on interview with the staff, the facility is aware of this requirement. The mechanism for handling non-conforming oil palm products and/or documents is addressed under Control of Non-conforming Product [PM-PRD-05, rev. 0, dated 2/1/2018] which describes the non-certified material or product shall be kept segregated from the certified ones.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The 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> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>All the information required by the standard was available in various shipping documents such as transporter's delivery order, mill's weighbridge, buyer's receiving notes, to name a few. The following contracts were verified:</p> <ul style="list-style-type: none"> i) SSD/1219/J01PK, dated 26/12/2019, commodity: RSPO MB Palm Kernel ii) SSD/1119/J02CPO, dated 13/12/2019, commodity: CPO RSPO MB 	<p>Complied</p>

3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill 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 mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>The company has outsourced the transportation for CPO and PK delivery to third parties and own company transporter. Transporter Agreements were verified as below:</p> <p>i) Hai Heng Enterprise Sdn Bhd valid for three years starting from 2/5/2019 to 30/4/2022 for CPO and PK.</p> <p>Requirement to adhere to RSPO supply chain standard is clearly defined in the agreement and the contractors have acknowledged on the requirements to be complied. There was a briefing of the RSPO SCCS requirements to the PK and CPO transporters on 28/7/2020 and attendance list was sighted.</p>	Complied
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Name and contact details of the contractor mentioned in Indicator 3.8.9 were available for verification.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The facility is aware of this requirement and there was no new contractor used since the last assessment.	Complied
3.8.12	Record keeping	The facility opted for three monthly basis record and balance. Excel format is used for the mass balance calculation. Among the	Complied

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	<ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) 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. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 	<p>information available in the format is month, FFB processed, OER, CPO amount [opening, produced and closing], dispatch of CPO & PK and balance of CPO & PK both in virtual and physical.</p> <p><u>CPO:</u> RSPO certified CPO produced in Aug 19-Jul 20 = 13,203.01 mt RSPO certified CPO sold as RSPO certified in Aug 19-Jul 20 = 1,794.73 mt RSPO certified CPO sold as ISCC certified in Aug 19-Jul 20 = 10,323.90 mt RSPO certified CPO sold as conventional in Aug 19-Jul 20 = 988.65 mt Balance of RSPO certified CPO = 95.73 mt</p> <p><u>PK:</u> RSPO certified PK produced in Aug 19-Jul 20 = 2,711.70 mt RSPO certified PK sold as RSPO certified in Aug 19-Jul 20 = 837.10 mt RSPO certified PK sold as conventional in Aug 19-Jul 20 = 1,844.71 mt Balance of RSPO certified PK = 29.89 mt</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>NA. Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER can be seen in Table 10 of this report.</p>	Not Applicable

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3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER and estimation can be seen in Table 10 of this report.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	NA. The facility opted for mass balance model.	Not Applicable
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	The actor is a palm oil mill and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. Based on the downloaded transactions register from the certification unit's PalmTrace, the company was able to demonstrate that it has been registering its transactions in the PalmTrace accordingly. Since the last assessment there were 33 announcements made.	Complied
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not in use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
General corporate communications			
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 Jambongan Oil Mill does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.	Complied
4.2	In corporate communications a member is allowed to:	Genting Jambongan Oil Mill does not use any RSPO trademark or logo in any general corporate communication. This was evident	Complied

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	<p>a. Display its RSPO membership status</p> <p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p> <p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>	through verification of the company website, invoices, letter head, contract with customers and others relevant records.	
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.	Genting Jambongan Oil Mill does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.	Complied
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.	Genting Jambongan Oil Mill does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.	Complied
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.	Genting Jambongan Oil Mill does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.	Complied
Business to business communications			
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.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. No claims have been made.	Complied
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.	Verification of shipping documents such as weighbridge tickets and delivery orders showed that the requirements of RSPO SCCS were adhered which included the information about certificate number stated.	Complied

5.3	<p>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:</p> <p>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 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>	Genting Jambongan Oil Mill is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
Business to consumer communication			
6.1	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.	No business to consumer communication on product specific claim made by Genting Jambongan Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.2	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.	No business to consumer communication on product specific claim made by Genting Jambongan Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made by Genting Jambongan Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	No business to consumer communication on product specific claim made by Genting Jambongan Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable

6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made by Genting Jambongan Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
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.	No business to consumer communication on product specific claim made by Genting Jambongan Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
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.	No business to consumer communication on product specific claim made by Genting Jambongan Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
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 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 www.rspo.org .	No business to consumer communication on product specific claim made by Genting Jambongan Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable

MODULE B – MASS BALANCE SPECIFIC RULES

Minimum Mass Balance content

	95% or above of the oil palm content must be RSPO MB-certified.	Based on the excel sheet mass balance accounting of the mill, production of certified products was calculated correctly according to fractions of FFB received from both certified and non-certified suppliers. Therefore, 100% of certified oil palm content in the products can be achieved.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Based on the excel sheet mass balance accounting of the mill, production of certified products was calculated correctly according to fractions of FFB received from both certified and non-certified suppliers. Therefore, 100% of certified oil palm content in the products can be achieved.	Complied
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> Surrounded by the text: 'Certified sustainable palm oil'. The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is 	Genting Jambongan Oil Mill is producing crude palm products and does not involve in any labelling of end product.	Complied

	provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document.		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>Genting Jambongan Oil Mill is producing crude palm products and does not involve in any labelling of end product.</p>	<p>Complied</p>
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>The Social Policy (incorporating the labour and human rights requirements) dated 22 June 2015 is available but not includes prohibiting retaliation against Human Rights Defenders (HRD) and yet to be communicated to all levels of the workforce, operations, FFB suppliers and local communities.</p>	<p>Non-compliance</p>

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4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Based on the interview with internal and external stakeholders, the certification unit is not use violence or harassment in their operations.	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Gening Plantations Berhad has the Sustainability management Procedure Manual (Doc No: SMP-GPB-18 Rev 03 dated 29/12/2017) for guidelines on the handling of land issues/boundary conflicts including related land conflicts. For other complaints, Sustainability Management Procedure Manual for Complaints & Grievances, Doc No: SMP-GPB-19, Rev: 03, Dated 21/03/2018.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	This procedure has been communicated to the external stakeholder through stakeholder meeting on 28/07/2020 while for employees is during company policy training on 30/01/2020 (GJBE) & 13/08/2020 (GJOM).	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	Based on the complaint & grievance book, the complainants have acknowledged if the issue has been solved by management. Sighted all the complaints were solved within the timeframe of 1 month.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	As per SOP Sustainability management Procedure Manual (Doc No: SMP-GPB-18 Rev 03 dated 29/12/2017) for guidelines on the handling of land issues/boundary conflicts including related land conflicts, the parties may explore the mediation process to achieve resolution in a timely and satisfactory manner if negotiations fail to find resolution.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			

4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Genting Jambongan Estate and Genting Jambongan Oil Mill has provided the contribution to the local communities based on their request through letter or during the stakeholder meeting.</p> <p>Among the contributions were:</p> <p>GJBE:</p> <ol style="list-style-type: none"> 1. Request for Backhoe service for waste dump site from Pondok Polis Jambongan dated 11/08/2020. 2. Request to supply clean water to Teacher's houses, and student hostel & surau at SK Jambongan dated 21/07/2020. <p>GJOM:</p> <ol style="list-style-type: none"> 1. Request for clean water supply to Kg. Hujung, Kg. Bahanan, Kg. Sharif and Kg. Malalin. 	Complied
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Land title was available and reviewed by the assessor. The mill was sitting on Genting Jambongan Estate land. The land title was belonging to Genting Plantation. Through interview with stakeholders, there is no evidence that the use of land diminishes the land use rights of other surrounding community.</p> <p>There were 597 land titles in Jambongan Estate. Sighted the quit rent payment:</p> <ol style="list-style-type: none"> 1. Transaction reference: 520118660100023, 520118660100002 & 5201186601000015. 2. Date: 16 July 2020. 3. Amount: RM 49.53, RM 7,656.60 & RM 53.55. 4. From: Genting SDC Sdn Bhd. 5. To: Jabatan Tanah dan Ukur Sabah. 	Complied

4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	The process established as Sustainability Management Procedure on Conflict Resolution and Handling of Negotiations and Compensations within GENP Estates, Doc no: SMP-GPB-18; Rev. 03; Date: 29/12/2017. No any disputes recorded.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of 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 unit of certification's title, concession or lease on the land. - Minor compliance -	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Genting Plantations Berhad and land ownership documents verified.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantation Berhad and land ownership documents verified. Interviewed with the smallholder confirmed that no land dispute reported. The estate is surrounded by smallholders and there is no village settlement near the area.	Complied

4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantation Berhad and land ownership documents verified. Interviewed with the smallholder confirmed that no land dispute reported. The estate is surrounded by smallholders and there is no village settlement near the area.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantation Berhad and land ownership documents verified. Interviewed with the smallholder confirmed that no land dispute reported. The estate is surrounded by smallholders and there is no village settlement near the area.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There is no land dispute in the operating units at the time of audit. The land belongs to Genting Plantation Berhad and land ownership documents verified. Interviewed with the smallholder confirmed that no land dispute reported. The estate is surrounded by smallholders and there is no village settlement near the area.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	There is no new planting on customary or user rights in Genting Jambangan Estate. Therefore, no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	Not Applicable
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	There is no new planting on customary or user rights in Genting Jambangan Estate. Therefore, no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	Not Applicable

4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>There is no new planting on customary or user rights in Genting Jambongan Estate. Therefore, no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.</p>	Not Applicable
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>There is no new planting on customary or user rights in Genting Jambongan Estate. Therefore, no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.</p>	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>There is no new planting on customary or user rights in Genting Jambongan Estate. Therefore, no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.</p>	Not Applicable
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>There is no new planting on customary or user rights in Genting Jambongan Estate. Therefore, no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.</p>	Not Applicable
4.5.7	<p>New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.</p> <p>- Minor compliance -</p>	<p>There is no new planting on customary or user rights in Genting Jambongan Estate. Therefore, no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.</p>	Not Applicable

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4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no new planting on customary or user rights in Genting Jambangan Estate. Therefore, no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	Not Applicable
Criterion 4.6: 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.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	The process established as Sustainability Management Procedure on Conflict Resolution and Handling of Negotiations and Compensations within GENP Estates, Doc no: SMP-GPB-18; Rev. 03; Date: 29/12/2017. No any disputes recorded.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	The process established as Sustainability Management Procedure on Conflict Resolution and Handling of Negotiations and Compensations within GENP Estates, Doc no: SMP-GPB-18; Rev. 03; Date: 29/12/2017. No any disputes recorded.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	The process established as Sustainability Management Procedure on Conflict Resolution and Handling of Negotiations and Compensations within GENP Estates, Doc no: SMP-GPB-18; Rev. 03; Date: 29/12/2017. No any disputes recorded.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	The process established as Sustainability Management Procedure on Conflict Resolution and Handling of Negotiations and Compensations within GENP Estates, Doc no: SMP-GPB-18; Rev. 03; Date: 29/12/2017. No any disputes recorded.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	The process established as Sustainability Management Procedure on Conflict Resolution and Handling of Negotiations and	Complied

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	- Critical (Major) compliance -	Compensations within GENP Estates, Doc no: SMP-GPB-18; Rev. 03; Date: 29/12/2017. No any disputes recorded.	
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -	The process established as Sustainability Management Procedure on Conflict Resolution and Handling of Negotiations and Compensations within GENP Estates, Doc no: SMP-GPB-18; Rev. 03; Date: 29/12/2017. No any disputes recorded.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	The process established as Sustainability Management Procedure on Conflict Resolution and Handling of Negotiations and Compensations within GENP Estates, Doc no: SMP-GPB-18; Rev. 03; Date: 29/12/2017. No any disputes recorded.	Complied
Criterion 4.8: 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.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	The process established as Sustainability Management Procedure on Conflict Resolution and Handling of Negotiations and Compensations within GENP Estates, Doc no: SMP-GPB-18; Rev. 03; Date: 29/12/2017. No any disputes recorded.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	The process established as Sustainability Management Procedure on Conflict Resolution and Handling of Negotiations and Compensations within GENP Estates, Doc no: SMP-GPB-18; Rev. 03; Date: 29/12/2017. No any disputes recorded.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations	The process established as Sustainability Management Procedure on Conflict Resolution and Handling of Negotiations and	Complied

	and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	Compensations within GENP Estates, Doc no: SMP-GPB-18; Rev. 03; Date: 29/12/2017. No any disputes recorded.	
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	The process established as Sustainability Management Procedure on Conflict Resolution and Handling of Negotiations and Compensations within GENP Estates, Doc no: SMP-GPB-18; Rev. 03; Date: 29/12/2017. No any disputes recorded.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous period prices paid for FFB are available in the agreement between the company and the third-party supplier. It is also publicly available upon request.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Mechanism of pricing is spelt out in Genting’s “Polisi Perolehan Tandan Buah Sawit (TBS)” (External FFB Procurement Policy Agreement). Explained by the Marketing Palm Product Manager (Mr. Chia Choon How) to the FFB supplier through a meeting on 10/5/2019.	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Based on interview, the third-party supplier is satisfied with the calculation formula documented in the agreement.	Complied
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	Not applicable as the mill did not receive FFB from any smallholder.	Complied

	- Critical (Major) compliance -		
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Not applicable as the mill did not receive FFB from any smallholder.	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Sampled transactions reference 5185404701000777, 518279140100001, 517974490100011 showed that the payments were made in timely manner according to the agreement.	Complied
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	GJOM has two units of weighbridge i.e. serial number 193850143 and 133750576. Both equipment has been last calibrated by a third-party metrology company on 12/11/2019 [receipt no.: B1602923 and B1602924] under Weights and Measures Act 1981, Regulations 16, 28A dan 45.	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Not applicable as the mill did not receive FFB from any smallholder.	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	The grievance mechanism for smallholders is guided by Genting's grievance procedure which details described in Criterion 4.2. So far there was no grievance raised from the third-party supplier.	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Not applicable as the mill did not receive FFB from any smallholder.	Not Applicable

5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	Not applicable as the mill did not receive FFB from any smallholder.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Not applicable as the mill did not receive FFB from any smallholder.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Not applicable as the mill did not receive FFB from any smallholder.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Not applicable as the mill did not receive FFB from any smallholder.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	A publicly available policy on equal opportunities as per People Policy; Rev. 00; Date: 3/8/2009 sighted and implemented accordingly. Based on the policy, 'we prohibit any form of violence, harassment or discrimination against race, religion, national origin, disability, pregnancy, age and gender. No one shall be denied of their rights, freedom of association and equal opportunities.	Complied
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance -	Based on the interview and recruitment agencies agreement, the recruitment fees charge to employers for administration purpose (RM 2300/worker) for Indonesian worker by PT Tekad Jaya Abadi	Complied

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		dated 03/04/2020 and (RM2,400/worker) for Indonesian Worker by Agensi MNK dated 01/07/2019.	
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	The recruitment has been based on the skill and expertise for the job related in estate and mill. Since the location is in the island, the vacancy is very less, and villagers will walk in for interview.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	The pregnancy test only conducted for female working with chemical such as pesticide sprayer, fertilizer applicator or rat bait. This is to ensure that no pregnant women are working with dangerous chemical. The pregnancy test is checked on monthly basis by Medical Assistant and results is summarized in the check-up spray/manuring.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	In GJBE, gender committee was formed, and the latest minute of meeting sighted dated 15/05/2020 (GJBE), 24/07/2020 & 25/01/2020 (GJOM). In the meeting, it was discussed the issues regarding activities and others.	Complied
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Either female or male workers, they were paid equally based on job type and skills. Further pay slip reviewed on clause 6.2.3	Complied
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	The training for contract agreement awareness were given to worker on 12/06/2020. Also, estate has showed the example of pay slip in the notice board for worker's reference.	Complied
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions,	Employment contract is signed by each worker detailing the working hours, rest days, levi, overtime, etc.	Complied

	<p>overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Sampled below workers:</p> <p>GJBE:</p> <ol style="list-style-type: none"> 1. Employee ID: E00683. 2. Employee ID: E01559. 3. Employee ID: E01639 4. Employee ID: E01376 5. Employee ID: E01443 <p>GJOM:</p> <ol style="list-style-type: none"> 1. Employee ID: E00001 2. Employee ID: E00093 3. Employee ID: E00123 4. Employee ID: E00131 5. Employee ID: E00132 	
<p>6.2.3</p>	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>No deduction been made except for advance and other lawful deduction such as EPF, SOCSO and EIS. Sighted the pay slip as below:</p> <p>GJBE:</p> <ol style="list-style-type: none"> 1. Employee ID: E00683. 2. Employee ID: E01559. 3. Employee ID: E01639 4. Employee ID: E01376 5. Employee ID: E01443 <p>GJOM:</p>	<p>Complied</p>

		<ol style="list-style-type: none"> 1. Employee ID: E00001 2. Employee ID: E00093 3. Employee ID: E00123 4. Employee ID: E00131 5. Employee ID: E00132 	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The mill and estates have provided housing facilities to the workers. They also supplied water tanks for the workers to store water. Water was treated in the mill treatment plant and found is clean. Interview with the housewives and workers found out that water and electricity was provided without charges. Clinic is in the estate compound to provide medical facilities to all the workers. Crèche is provided in the mill and estate for the kids. Hospital Assistant has conducted the weekly housing inspection.</p> <p>Based on the result of analysis for drinking water sample taken from treated water storage tank in mill, the drinking water supplied found complied to the National Standard for Drinking Water Quality, 2nd Version, January 2004 by Engineering Services Division, Ministry of Health Malaysia. Results available (not detected for e-coli and total coliforms) in Certificate of Analysis; Report Lab ref No: W200714/01; Dated: 14/07/2020 by Dynakey Laboratories Sdn Bhd. GJBE & GJOM also has the projection of housing maintenance within 5-years for all building.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Sundry shops and canteens were located next to mill. The goods and foods price list were displayed at the shop. Besides, the management has provided 3x boat trip from Jambongan Island to Paitan town for workers.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p>	<p>The DLW was established for GJBE and GJOM dated 13/12/2019.</p> <p>Housing cost/worker/moth: RM 256.76.</p> <p>Grand total in kind benefits: RM 692.32.</p>	Complied

<p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits 	<p>Prevailing wages: RM 1,977.88 (average take home pay/piece rated harvesters) & RM 1,707.32 (minimum earned wage by checkroll general workers).</p>	
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	<ul style="list-style-type: none"> There is annual progress on the implementation of living wages Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>There are no casual or temporary workers used in the certification unit. All workers are check roll and contracted workers used for all work perform.</p>	Complied
<p>Criterion 6.3: The unit of Certification 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>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The statement published as per as per People Policy; Rev. 00; Date: 3/8/2009 sighted available in local languages recognizing freedom of association.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>In GJOM, the latest meeting with workers' representative was conducted on 23/06/2020 and 10/03/2020 as per "Minit Mesyuarat Ahli Jawatankuasa Kebajikan Pekerja Pertama & Kedua Tahun 2020" attended by 8 people. The minute of meeting is available in English language.</p> <p>In GJBE, the latest meeting with workers' representative was done on 24/06/2020 as per "Minit Mesyuarat Persatuan Pekerja" attended by 17 people sighted. The minute of meeting is available in English language.</p>	Complied

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6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>The worker representatives have been elected based on majority votes by the workers or appointed by management.</p> <p>Sighted the worker representatives as below:</p> <p>GJBE:</p> <ol style="list-style-type: none"> 1. Ladis Djeen Malonasi (Div 1). 2. Adelaida Evalina Wulandari (Div 1). <p>GJOM:</p> <ol style="list-style-type: none"> 1. Junardin Ibrahim (05/01/2019). 2. Mohd Khairul Azhar (01/07/2020). 	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The Social Policy dated 22/06/2015 has mentioned the protection of children under clause 3. Children are entitled to the basic right of an education and must not be hired for full-time work before completing their compulsory education.</p> <p>Under agreement contracts, it is mentioned in the clause D (i) The contractor shall ensure no minors (below 18 years old) are employed. Sampled the contract agreement as below:</p> <p>GJBE:</p> <ol style="list-style-type: none"> 1. Syarikat C.M dated 01/01/2020. 2. Pengangkutan Yee Kiun dated 01/01/2020. 3. Sarawanan A/L Periasamy dated 11/06/2020. <p>GJOM:</p> <ol style="list-style-type: none"> 1. Hai Heng Enterprise Sdn Bhd dated 01/05/2019. 2. Magtron Electrical Engineering Sdn Bhd dated 25/09/2018. 	Complied
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above</p>	<p>Based on Workers List as of 2020 for both mill and estates, no any children being employed or exploited. During the housing inspection</p>	Complied

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	<p>company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>visit, sighted that children are sent to school and not employed or following their parents to work.</p> <p>There is also the Procedures for Social Management Doc No: SMP-GPB-32 Rev 00 dated 18/01/2018 under clause 6.8.4 child labour, young workers (under aged) and illegal workers, refer to Social Policy part 3, child labour:</p> <p>Indicators:</p> <ul style="list-style-type: none"> • The company does not employ workers less than 15 years of age for full time work and 18 years of age for hazardous work. • If the company employs minors below the age of 18 the company has a list of job functions that can safely be performed by minors. 	
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There are no young persons employed in GJBE and GJOM.</p>	<p>Complied</p>
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The communication of no child labour policy together with the Social Management were given through the stakeholder meeting on 28/07/2020 to all stakeholders.</p>	<p>Complied</p>
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has implemented a Sexual Harassment Policy dated 3/8/2009 signed by Chief Operating Officer. There is also 'Guidelines on Prevention and Eradication of Sexual Harrassment at the Workplace, version 0 (2010) by Sustainability Department.</p> <p>Training on sexual harassment in workplace has been given to the workers through briefing on policies on 30/01/2020 for workers at</p>	<p>Complied</p>

		GJBE and 13/08/2020 at GJOM. Attendant list and training material are sighted.	
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Genting Plantations Berhad has implemented a Social Policy (Incorporating the Labour and Human Rights requirements) dated 22/6/2015. In the policy statement, it mentioned that reproductive rights are protected. Briefing on policies on 30/01/2020 for workers at GJBE. Attendant list and training material is sighted.	Complied
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -	The new mothers have been consulted by Klinik Kesihatan nurse on the needs and the outcome is: 1. To provide transport for new mothers for checkup at Klinik Kesihatan with the information of 1 week earlier for logistic arrangement. 2. For others needs such as pampers, clothes, formula milk, healthy meals for pregnant mom and 'pantang' tools, the grocery is available in Jambongan Island. Also, they can obtain the needs by taking the boat to the main land.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	For grievance and complaints regarding sexual harassment or domestic violence, there is specific complaint form established and communicated in the gender committee meeting. So far, there is no sexual harassment cases reported at both GJBE & GJOM.	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All workers have entered into employment voluntarily and the following are prohibited: <ul style="list-style-type: none"> Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees. Contract substitution Involuntary overtime 	The passports were kept in estate/mill office with worker's consent and voluntarily for safekeeping. There are no recruitment fees charges to workers based on the documentation review at pay slip and interview with workers. No contract substitution as the employment contract provided by estate is similar with the terms and condition with the demand letter signed by labour agency and Indonesian Embassy.	Complied

	<ul style="list-style-type: none"> • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>There is overtime form for workers who offer work overtime which has consent between management and workers.</p> <p>Termination of employment are:</p> <ul style="list-style-type: none"> • Work with other employers. • Not comply with the law. • Irresponsible in works. • Absent for more than 2 days without valid reason. • Etc. 	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Specific labour policies i.e. People Policy and Social Policy evidently implemented where migrant workers are treated equally as per the local workers.</p>	Complied
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>GJBE</p> <p>The Estate Manager has been appointed as Person Responsible / Chairman for Safety and Health in the estate as per appointment letter signed by the Sr. Manager Operations as per appointment letter dated 13/9/2019.</p> <p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the signed Estate Manager on 1/1/2020. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, housing inspection, workplace inspection, and training. Sighted the minutes meeting records as follows:</p>	Complied

		<ol style="list-style-type: none"> 1. 13/8/2020 2. 13/5/2020 3. 13/2/2020 4. 14/11/2019 <p>Additionally, the estate conducted the meeting to for investigation of accident occur. Sighted the minutes meeting for accident investigation of accident occur in manuring operation dated 20/6/2020.</p> <p>GJOM</p> <p>Genting Plantations appointed the Mill Manager as the person responsible for workers safety and health as per appointment letter dated 1/1/2018 signed by the Vice President (Sabah) - Processing. The mill management has established Safety and Health committee Mill management consist representatives from Employer and representatives from Employee as per appointment letter by the Mill Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. Sighted the minutes meeting records as follows:</p> <ol style="list-style-type: none"> 1. 16/7/2020 2. 23/1/2020 3. 23/10/2019 4. 23/7/2019 	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained</p>	<p>Genting Plantations Berhad has established accident and emergency procedure and documented in System Procedure: Emergency Response Procedure. Refer document no. SP-MGR-04 dated 1/8/2017.</p>	Complied

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	<p>in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>GJBE</p> <p>The estate has established Emergency Response Team as per appointment letter dated 2/1/2020.</p> <p>Latest training for ERP training was conducted on:</p> <ol style="list-style-type: none"> 1. First aid training dated 4/5/2020 and 22/6/2020 2. Emergency Response Plan training dated 17/3/2020 3. Fire drill training dated 27 & 29/7/2020 and 12 & 13/8/2020 <p>Noted during site visit and interview with the workers, the awareness on the ERP was satisfactory. The field mandore were trained and equipped with first aid box for early respond and treatment during accident occur.</p> <p>GJOM</p> <p>The mill has established Emergency response team. Training has been conducted regularly to ensure the awareness on the ERP. Sighted the training records of the ERP as follows:</p> <ol style="list-style-type: none"> 1. Fire drill training dated 11/8/2020 2. 2. Spillage drill training at compost plant training dated 11/8/2020 <p>Noted during interview with workers, the workers were aware regarding the location of firefighting equipment, first aid box and the competent first aider in the mill.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The management provide appropriate PPE to the employee's base on the job type. The PPE given as per HIRARC and Standard Operating Procedure. PPE issuance was recorded in 'Borang Pemberian dan Peggantian' PPE by individual basis. Sighted the PPE issuance records for employees as follows:</p> <p>GJBE (Sprayers)</p>	Complied

		<ul style="list-style-type: none"> i. E01490 ii. E01452 iii. E01653 iv. E00124 <p>GJOM (Fireman (Boiler Station))</p> <ul style="list-style-type: none"> i. E00133 ii. E00123 	
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial).</p> <p>For workers involved in accident and eligible for medical benefit from SOCSO, the claim form was submitted to SOCSO through 'Borang 34 – Butir Notis dan Tuntutan Faedah'.</p> <p>GJBE</p> <p>Sighted the form 8A, "Jadual Caruman" for 309 workers for the month of May and June 2020 and 306 workers for the month of July 2020.</p> <p>GJOM</p> <p>Sighted the form 8A, "Jadual Caruman" for 26 workers for the month of April, May and June 2020</p>	Complied
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2019 as reported to DOSH as follows:</p>	Complied

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		Operating units	Accident Cases	LTA	
		GJBE	4	9	
		GJOM	1	2	

Principle 7: Protect, conserve and enhance ecosystems and the environment

Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -</p>	<p>Addressed in the Oil Palm Manual under section Pest and Disease. Refer document no. OPM 5, rev. June 2013. It identified the pest such as :</p> <ol style="list-style-type: none"> 1. Bagworms 2. Nettle caterpillars 3. Grasshopper 4. Rhinoceros beetles 5. Bunch moth 6. Vertebrates such as rats 7. Pest & Diseases in nursery 8. Ganoderma <p>The estate has established IPM management plan focusing on Beneficial Plant and Rat Baiting Campaign. Sighted the implementation as follows:</p>	Complied
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		<p>i. The estate continuously planting beneficial plant such as Tunera subulata. Sighted the beneficial planting along the main road. Map and records of beneficial plant was available for review.</p> <p>ii. The estate conducted 2 rat baiting campaign per year as base on rat census result. Sighted the latest rat baiting campaign conducted in July 2020 for field no. 7, 8, 62 and 69. The baiting rounds was at 3 – 4 rounds with acceptance level at below 20%.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>Genting Plantations has established ASEAN Zero Burning Policy (1999) and the Environmental Quality (Declared Activities) (Open Burning) Order 2003 signed by the President and Chief Operating Officer dated 10/8/2011.</p> <p>No evidence and records of fire usage for pest control at all estate visited.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The justification of all pesticides used in the estate were documented in Sustainability Management procedure Manual under section SOPs and Justification of Pesticides Used. Refer document no. SMP-GPB-28, rev 4 dated 3/7/2018.</p> <p>The SOP addressed on:</p> <ol style="list-style-type: none"> 1. Procedures on pesticides usage 2. Type of pesticides 3. Justification of all pesticides used <ol style="list-style-type: none"> a. Crop stage 	Complied

		<ul style="list-style-type: none"> b. Application Type c. Pesticide Name d. Active Ingredient e. Class (by Pesticide Malaysia) f. WHO class g. Target Weed/Pest 									
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate.</p> <p>Sighted the sampled records of pesticides usage per ha at estate visited as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>2018</th> <th>2019</th> <th>As at June 2020</th> </tr> </thead> <tbody> <tr> <td>GJBE</td> <td>0.056</td> <td>0.039</td> <td>0.107</td> </tr> </tbody> </table>	Month	2018	2019	As at June 2020	GJBE	0.056	0.039	0.107	Complied
Month	2018	2019	As at June 2020								
GJBE	0.056	0.039	0.107								
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Sustainability Management procedure Manual under section SOPs and Justification of Pesticides Used. Refer document no. SMP-GPB-28, rev 4 dated 3/7/2018.</p> <p>The implementation in the field is consistent with the SOP established.</p>	Complied								
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>No prophylactic use of pesticide were identified in the estates.</p>	Complied								

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7.2.5	<p>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, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>There is no usage of pesticide that are categorised as WHO Class 1A or 1B at the estate visited.</p> <p>Noted during site visit at the chemical store and document review of chemical register dated 10/1/2020, no chemical categorised as WHO Class 1A or 1B were used in the estate.</p>	Complied
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides operators has been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly medical check-up done by the Medical Assistant. Sighted the training records as follows:</p> <ol style="list-style-type: none"> 1. Spraying training dated 12 – 12/2/2020, 17/3/2020 and 4/5/2020 2. Rat baiting training dated 21/7/2020 and 27/6/2020 3. Calibration pump and spray dated 17/3/2020 4. Triple rinse training dated 17/3/2020 	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units 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</p>	Complied

		are kept in the store and securely locked and comply with regulation.	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	Empty pesticides container were identified as recycle waste. All empty pesticides containers were triple rinse, puncture and stored at designated stored before disposed to licensed contractors, G-Planter Sdn. Bhd. The estate maintain the inventory records of empty pesticides containers. Sighted the records for FY 2019 and todate 2020. Sighted the disposal records by G-Planter Sdn. Bhd. as per UPPCR Collection Form dated 13/2/2020 and 20/2/2019.	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	No evidence of aerial spray conducted at the estate visited.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	Latest CHRA has been conducted by assessor with reg. no. HQ/07/ASS/00/236 on 8/4/2019 – 31/10/2019. Refer report no. JKPP HQ/07/ASS/00/236-2019/157. As per report, the estate are required to conduct medical surveillance if the estate decided to use the organophosphate chemical as per OSHA 1994 USECHH Regulation 2000 sub-regulation 1972 in Scheduled II Chemicals. Noted during site visit at the chemical store and document review of chemical register dated 10/1/2020, no chemical listed in Scheduled II were used in the estate. The estate conducted medical check-up for pesticides operator on monthly basis by Hospital Assistant. Sighted the Summary-Check Up Spray/Manuring for the month of June and July 2020.	Complied

7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantations Berhad has established Safety and Health Manual under section USECHH regulation 2000. Refer document no. OM-GPB-10 dated 1/1/2010.</p> <p>In the SOP under section 9 – Medical Protection Removal clearly stated that the Estate manager can't allow the workers to be expose with chemical if:</p> <ol style="list-style-type: none"> 1. Under the age of 18 2. Pregnant 3. Breastfeeding women 4. Other people that have medical restrictions 	Complied
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Documented waste management plan was available at Jambongan Oil Mill and Estate. Among the types of waste identified were scheduled wastes, domestic wastes and recyclable wastes. The scheduled wastes were disposed in accordance to EQA regulations, domestic wastes were landfilled in accordance to procedure and recyclable wastes are planned to be delivered to recycle wastes vendors.</p> <p>With regards to scheduled wastes disposal, the visited operating units have satisfactorily maintained the regulated documents such as notification, inventory records and consignment notes through e-swiss. Among the scheduled wastes generated by the operating units were spent lubricants, spent batteries, contaminated filters & rags, contaminated PPE and clinical wastes to name a few.</p> <p>Sampled consignment notes verified:</p> <p>2020082410Z5QFVK, dated 12/8/2020 for SW404</p> <p>2020080414KUP7NA, dated 29/7/2020 for SW410 (used PPE)</p> <p>2020073013GMVF61, dated 29/7/2020 for SW305 (spent lubricant)</p>	Complied

		2020073013PFBYD3, dated 29/7/2020 for SW410 (rags)	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	Ref.: Sustainability Management Procedure Manual, SMP-GPB-12, rev. 1, dated 1/12/2014. Based on interview and site verification, it was noted that the proper disposal of wastes was understood by the workers and management.	Complied
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	VSH Based on site verification and interview with employees at all the sampled operating units, there was no use of fire in wastes disposal observed. Domestic and household wastes were landfilled and based on site visit, it was observed that the majority of the wastes were of organic wastes.	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	GJBE practices good agricultural practices as contained in their SOPs (Oil Palm Manual, dated 30/8/2013). They are followed to manage the soil fertility to levels ensuring optimal and sustainable yields. One of the SOP procedures, OPM 7: Manuring of Oil Palm is referred for managing soil fertility. It includes sections on: a. Introduction b. Nursery manuring c. Field Manuring d. Application of Fertiliser e. Fertiliser delivery and Stock Reports for estates f. Fertiliser sampling for analysis g. Manuring Schedule	Complied

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		h. Method of application for younger and mature palms					
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	Genting Plantations Berhad has established SOP for Soil Sampling. Refer SOP no. GPRC/SOP/FS/02 rev. 1, dated 26/3/2019. As per SOP, soil sampling to be conducted every 10 years. Latest soil sampling analysis was carried out on 24/9/2018. Refer report no. SR21/2018 dated 25/10/2018. Latest leaf sampling was conducted on 3/7/2020. Refer report no. PR35/2020 dated 13/8/2020.	Complied				
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	The EFB and POME produce were used as raw material for bio composting plant. The bio compost produced were applied back to the field as nutrient cycle strategy. Compost application was carried out in at 80kg/palm. The latest application was done on August 2020, total 3910.	Complied				
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	The estate maintain the records of manuring application as per recommendation by the agronomist. Observed application records as per agronomist recommendation: <table border="1" data-bbox="1137 1050 1926 1385"> <tr> <td>Month program: Feb 2020 Field: 1/4 Type: NK Mix B (AS) Month completed: 28/1/2020</td> <td>Month program: Apr 2020 Field: 3/64 Type: AC Month completed: 19/6/2020</td> </tr> <tr> <td>Month program: Feb 2020 Field: 1/12</td> <td>Month program: May/Jun 2020 Field: 1/2</td> </tr> </table>	Month program: Feb 2020 Field: 1/4 Type: NK Mix B (AS) Month completed: 28/1/2020	Month program: Apr 2020 Field: 3/64 Type: AC Month completed: 19/6/2020	Month program: Feb 2020 Field: 1/12	Month program: May/Jun 2020 Field: 1/2	Complied
Month program: Feb 2020 Field: 1/4 Type: NK Mix B (AS) Month completed: 28/1/2020	Month program: Apr 2020 Field: 3/64 Type: AC Month completed: 19/6/2020						
Month program: Feb 2020 Field: 1/12	Month program: May/Jun 2020 Field: 1/2						

		Type: NK Mix B (AS) Month completed: 16/1/2020	Type: Kieserite Month completed: 28/7/2020				
Criterion 7.5: Practices minimise and control erosion and degradation of soils.							
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	Soil series map available for both estates visited.		Complied			
		<table border="1"> <thead> <tr> <th>Estate</th> <th>Soil Series</th> </tr> </thead> <tbody> <tr> <td>GJBE</td> <td>Maliau (40.77%), Dalit (27.77%), Brantian (19.62%), Sook (6.76%), Weston (4.04%), Kapayan (1.04%)</td> </tr> </tbody> </table>	Estate		Soil Series	GJBE	Maliau (40.77%), Dalit (27.77%), Brantian (19.62%), Sook (6.76%), Weston (4.04%), Kapayan (1.04%)
Estate	Soil Series						
GJBE	Maliau (40.77%), Dalit (27.77%), Brantian (19.62%), Sook (6.76%), Weston (4.04%), Kapayan (1.04%)						
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Planting terraces had been constructed where slope >10°. Fields are established with cover crops such as mucuna and soft grasses and ferns.</p> <p>The estate will refer to the following procedures for guidance</p> <p>a) OPM 4 : Soil conservation and terracing (rev 2013)</p> <p>b) Steep land Management SMP –GPB-10</p> <p>The estate also has a file known as File 56: Estate Maps & Satellite Images where the following are identified for reference :</p> <p>a) Soil Map</p> <p>b) Slope class map</p> <p>c) Blocking map</p>		Complied			

		d) Riparian buffer zone map Soil maps and slope maps were sighted at GJBE.															
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting conducted at Jambongan Estate.	Complied														
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.																	
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Soil series map available for both estates visited. No fragile soil categorized in the estates visited as per soil map issued by Genting Plant Research Center. The Genting Plantation Research Centre conducted assessment and provided the estates with topography maps. Topography information at estate visited as follows: <table border="1" data-bbox="1137 890 1731 1241"> <thead> <tr> <th></th> <th>GJBE</th> </tr> </thead> <tbody> <tr> <td>0° - 2°</td> <td>38.73 %</td> </tr> <tr> <td>2° - 6°</td> <td>45.82 %</td> </tr> <tr> <td>6° - 12°</td> <td>13.54 %</td> </tr> <tr> <td>12° - 20°</td> <td>1.90 %</td> </tr> <tr> <td>20° - 25°</td> <td>0.01 %</td> </tr> <tr> <td>> 25°</td> <td>0.00 %</td> </tr> </tbody> </table>		GJBE	0° - 2°	38.73 %	2° - 6°	45.82 %	6° - 12°	13.54 %	12° - 20°	1.90 %	20° - 25°	0.01 %	> 25°	0.00 %	Complied
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7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	No fragile soil categorized in the estates visited as per soil map issued by Genting Plant Research Centre.	Complied														
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	<p>The Genting Plantation Research Centre conducted assessment and provided the estates with topography maps. Topography information at estate visited as follows:</p> <table border="1" data-bbox="1137 679 1731 1027"> <thead> <tr> <th></th> <th>GJBE</th> </tr> </thead> <tbody> <tr> <td>0° - 2°</td> <td>38.73 %</td> </tr> <tr> <td>2° - 6°</td> <td>45.82 %</td> </tr> <tr> <td>6° - 12°</td> <td>13.54 %</td> </tr> <tr> <td>12° - 20°</td> <td>1.90 %</td> </tr> <tr> <td>20° - 25°</td> <td>0.01 %</td> </tr> <tr> <td>> 25°</td> <td>0.00 %</td> </tr> </tbody> </table>		GJBE	0° - 2°	38.73 %	2° - 6°	45.82 %	6° - 12°	13.54 %	12° - 20°	1.90 %	20° - 25°	0.01 %	> 25°	0.00 %	Complied
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Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.																	
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	No peat soil identified in estate visited. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable														
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	No peat soil identified in estate visited. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable														

	<p>PROCEDURAL NOTE:</p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>		
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	No peat soil identified in estate visited. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	No peat soil identified in estate visited. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	No peat soil identified in estate visited. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p>	No peat soil identified in estate visited. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable

	- Critical (Major) compliance -		
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	No peat soil identified in estate visited. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	Genting Jambangan Estate has established its water management plan dated 5/5/2020. The objective of the plan is to conserve the potable water. Apart from that, in order to maintain the availability of surface and ground water, pollution prevention through establishment of riparian zones was also in place.	Complied
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with ‘RSPO Manual on BMPs for the management and rehabilitation of riparian reserves’ (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	The potable water for workers is provided at the houses through pipelines. The water is sourced from water catchment ponds and treated at the water treatment plants. The clean water quality is tested quarterly to ensure safety. For example, the latest three analysis reports for workers housing at Division 1 were available for verification [ref. lab report no.: 20190311/05 (11/3/2019), 20190717/01/1 (18/6/2019), W190923/02 (23/9/2019) and 20191213/01/1 (8/12/2019)]. The analysis was done by an accredited lab (SAMM no. 576).	Complied

7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -	BOD of effluent is not regulated for Jambongan mill. The mill is practicing zero discharge with conditions stipulated in its DOE license. Mill effluent is processed with EFB in a plant to produce compost where eventually applied in the field as fertiliser.	Complied
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Mill has maintained monitoring of water usage for processing FFB which recorded every month. Water for processing is abstracted from a water catchment pond. The average consumption in 2019 was 1.45 m ³ /mt FFB while as at July 2020, the average consumption was 2.43 m ³ /mt FFB.	Complied
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	<p>Plan for improving efficiency of fossil fuel was spelt out in "Management Plan to Improve Efficiency of Diesel Usage". Among the plans established by the operating units were:</p> <p><u>Estate</u></p> <ul style="list-style-type: none"> regular service of tractors for efficient running of engines to educate tractor drivers on diesel saving <p><u>Mill</u></p> <p>Fossil fuel was most consumed at the engine room. The overall average consumption reported for the year 2019 is 4.11 lt/mt FFB. The data is documented in the mill's monthly diesel consumption record.</p> <p>Monitoring of diesel fuel consumption was done by all the visited operating units. The data was then used for GHG calculating by using the RSPO GHG Calculator.</p>	Complied
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			

<p>7.10.1</p>	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Identification of greenhouse gas (GHG) emissions has been done through the environmental aspect & impact assessment. Among the source of GHG emissions were effluent treatment plant, diesel consumption and fertiliser consumption to name a few. The plan to reduce or minimise the GHG emission has been established and implemented. In general, among the action plans were:</p> <ul style="list-style-type: none"> - To optimise the usage of diesel through regular maintenance of farm tractors, replacement of old tractors and organise harvesting operation to minimise the movement of FFB transporters - To apply more organic fertiliser such as mill compost therefore reducing inorganic fertiliser dependency <p>RSPO GHG Calculator version 4 is used. The consumption of fertilisers and diesel were verified through</p> <p>Estate:</p> <ul style="list-style-type: none"> • Lintramax Store Report • Bin card • store requisition & issuance note <p>Mill:</p> <ul style="list-style-type: none"> • Stock Issue Summary (Lintramax) • Diesel Store Record • store requisition & issuance note • Effluent Treatment Plant Log sheet <p>Based on the verification of the above records, all the sampled issuance was traceable.</p>	<p>Complied</p>
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7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>Not applicable since no new development by the certification unit after 15/11/2018. The last new land development was completed in 2016 and has undergone the NPP.</p>	Not Applicable
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Other significant pollutant identified is the smoke emission from boiler operation. The mill currently is using multi-stage dust cyclone to minimise the pollutant. Monitoring of quality is done through regular stack sampling. Verification of the stack sampling reports [ref.: report # RT003/2020/012 (13/2/2020), MS/GJOM/2019/BOILER NO. 1(S1) (31/10/2019), MS/GJOM/2019/BOILER NO. 2(S2) (1/11/2019), showed that the mill did not comply with the regulated limit which is 150 mg/m³. Nonetheless, the mill has been granted with contravene license [license no. 005162, validity 30/8/2019 to 30/8/2020] by the DOE. In order to comply the regulated limit, the mill is in the process of having its electrostatic precipitation (ESP) to be commenced which is expected to be at the end of the year.</p>	Complied
<p>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</p>			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>There is no replanting at Jambongan Estate. All the palms are at first generation and the oldest palms were planted in 2004. There is no evidence that open burning is being practiced and this is also monitored through the Environmental Monitoring & Compliance Report.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>The Genting Sustainability Department is in the midst of finalising the fire prevention and control measures and draft is already available for viewing. The document will be disseminated to all the Genting's operating units once approved.</p>	Complied

7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Although its fire prevention and control measures is in the draft stage, there was no evidence that the adjacent stakeholders were engaged in developing it. The adjacent stakeholders consist of among others a neighbouring estate, Kg Limau-Limau, Kg Malalin, Kg Hujung and Kg Bahanan. Thus, a non-conformity report was assigned due to this lapse.</p>	Non-compliance
<p>Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>A comprehensive and independent High Conservation Value (HCV) Assessment for on-site assessment done from 4-8 August 2014 which included participation internal and external stakeholders were completed by an assessment team from S.K. Yap Forestry and Landscape Advisory Services, led by Dr. Yap Son Kheong. The report was finalized on October 2014. There was only one HCV area identified in the proposed new planting area, i.e. HCV 4.1 which is a stream utilized by the villagers at Kg Limau Limau which flows from Block E and Sg Ginday in Block D. Based on the report, it was confirmed that no primary forest or peat present in any of these land parcels.</p>	Complied
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p>	<p>The last new land development was completed in 2016 and has undergone the NPP. There is no new land clearing after 15/11/2018 at Jambongan certification unit. Nonetheless, HCV assessment had been done as described in Indicator 7.12.1.</p>	Complied

	<p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -</p>												
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable.	Not Applicable										
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -</p>	<p>The last new land development was completed in 2016 and has undergone the NPP. Not applicable as there is no new land clearing after 15/11/2018.</p> <p>Nonetheless, there is an HCV management plan established based on the result of the assessment mentioned in Indicator 7.12.1. Verification on-site confirmed that the plan was satisfactorily implemented. Among the management plans were:</p> <table border="1"> <thead> <tr> <th>HCV</th> <th>Management Plan</th> </tr> </thead> <tbody> <tr> <td>1.2 and 1.3</td> <td>To protect existing vegetation and erection of signage Fauna species found False Gharial and Proboscis Monkeys – maintain 30m buffer belt with the residual forest area</td> </tr> <tr> <td>4.2</td> <td>Protection of steep area by prescribing no disturbance to the vegetation and no planting for the next cycle.</td> </tr> <tr> <td>5</td> <td>Continuous consultation with the local communities so as to discourage further activities within estate. Any illegal harvesting should be reported to the authority.</td> </tr> <tr> <td>4.1</td> <td>Establish buffer zone as per Sabah Water Resource Enactment 1998. With the proposed riparian reserve of 5 m and 20 m width along each river bank. Sq Limau, the approx. total area is 1.55</td> </tr> </tbody> </table>	HCV	Management Plan	1.2 and 1.3	To protect existing vegetation and erection of signage Fauna species found False Gharial and Proboscis Monkeys – maintain 30m buffer belt with the residual forest area	4.2	Protection of steep area by prescribing no disturbance to the vegetation and no planting for the next cycle.	5	Continuous consultation with the local communities so as to discourage further activities within estate. Any illegal harvesting should be reported to the authority.	4.1	Establish buffer zone as per Sabah Water Resource Enactment 1998. With the proposed riparian reserve of 5 m and 20 m width along each river bank. Sq Limau, the approx. total area is 1.55	Complied
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		<p>hectares. Sg Ginday, the approx. total area is 0.93 hectares.</p> <p>To map important water resource areas, and to place signboards, to provide protection/buffer to the location.</p> <p>To inform stakeholders on importance of watershed protection.</p> <p>To install poles in red and white paint to show distance of buffer zone.</p> <p>To include the buffer zone and potential erosion area in the map</p> <p>Land or vegetation cover in the high potential erosion area should be well maintained, or should be improved if necessary.</p> <p>To avoid any weeding or manuring activities on palms within the buffer zone.</p> <p>To place signages informing stakeholders on HCV area</p> <p>To socialize the importance of conservation of buffer zone to sprayers and general workers</p>		
		<p>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.</p>		

7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>The last new land development was completed in 2016 and has undergone the NPP. Not applicable as there is no new land clearing after 15/11/2018.</p>	Not Applicable
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>Based on the HCV assessment report mentioned in Indicator 7.12.1, there was no RTE species presence in the plantation area (Clause 8.4.1 of the report). Nonetheless, signage about the restriction to capture RTE and the information about disciplinary measures were erected at many strategic places in the estate to educate the employees.</p>	Complied
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The last new land development was completed in 2016 and has undergone the NPP. There is no new land clearing after 15/11/2018. Nonetheless, monitoring of HCV was done once in two months by utilising a checklist. Among the criteria outlined in the checklist were cleanliness, safety, signage, intrusion, restricted activities and others.</p>	Not Applicable
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Jambangan Estate has established its remediation plan with an objective to restore the areas with environmental impact as identified in the land use change analysis.</p> <p>According to the Land Use Change Analysis Verification Result, prepared by RSPO's Independent Reviewer (Aksenta) in February 2016, the areas that required remediation is the buffer zones of Sungai Segempa (a.k.a Sg. Guntur) The total area required for remediation action amounts to 15.98 Ha. The restoration has been completed and ongoing monitoring is being carried out. Water</p>	Not Applicable

		analysis was also done at a selected point of Sg Guntur twice a year incorporated with the Environmental Monitoring & Compliance Audit.	
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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 October 2020	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,		Dec,2015		
5		Genting Tebong Estate,		July, 2015		
		Genting Sepang Estate		Feb, 2020		
	Genting Cheng Estate					
6	Genting Plantations (WM) Sdn Bhd (100%)for estates	Genting Selama Estate, Kedah, Malaysia		July 2019	Certified	None
7	Genting SDC Sdn Bhd (100%)	Genting Sabapalm Estate, Sabah, Malaysia	Supply base for Genting Sabapalm Oil Mill, Sabah, Malaysia	Aug,2015	Certified	None

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of October 2020	Any unresolved non-compliances
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 Bhd (100%) for estates	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah Oil Mill, Sabah, Malaysia	2020		Concept Note for RACP re-submitted to RSPO.
14		Genting Permai Estate, Sabah, Malaysia				
15		Genting Kencana Estate, Sabah, Malaysia				
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	Certified	None
17	Genting Plantations Bhd	Genting Sekong Estate, Sabah, Malaysia	Supply base for Genting Trushidup	Sept,2017	Certified	None

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of October 2020	Any unresolved non-compliances
	Wawasan Land Progress Sdn Bhd (100%)		Oil Mill, Sabah, Malaysia			
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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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of October 2020	Any unresolved non-compliances
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		In process of obtaining HGU NPP for PT UAI in progress. In the process of obtaining HGU for UAI.
24	PT United Agro Indonesia(60%)	PT UAI 1 & 2 UAI Plasma		Oct, 2023		
25	PT Susantri Permai (95%)	Puroh Estate Masaha Estate Zircon Hill Estate	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia	Oct, 2022		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		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		KMJ Plasma		Oct, 2023		

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of October 2020	Any unresolved non-compliances
27	PT Dwie Warna Karya (95%)	Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate		Oct , 2022		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		In process of obtaining HGU. HCSA report completed review
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		In process of obtaining HGU. HCSA report completed review
30	PT Agro Abadi Cemerlang (70%)	AAC 1 & 2 AAC 3 & 4				In process of obtaining HGU HCSA report under review by HCSA.
31	PT Palma Agro Lestari Jaya (70%)	PALJ Estates	Supply base for PALJ Oil Mill*	Aug,2023		In process of obtaining HGU. HCSA report completed review
		PALJ Plasma				

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of October 2020	Any unresolved non-compliances
32	Knowledge One Investment Pte Ltd (85%)-PT Kharisma Inti Usaha (KIU)	KIU 1 & 2	Supply base for KIU Oil Mill	July,2020		NPP in progress. HCV report being reviewed by HCVRN. HCSA report to be reviewed by HCSA.
		KIU 3 & 4		July 2022		
		KIU Plasma				

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2019 for Genting Jambangan Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. 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 data 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 2019 for Genting Jambangan Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.38
PKO	0.38

Extraction	%
OER	22.34
KER	4.42

Production	t/yr
FFB Processed	77,981.31
CPO Produced	17,422.92
PKO Produced	3,448.34

Land Use	Ha
OP Planted Area	3,790.14
OP Planted on peat	0
Conservation (forested)	24.36
Conservation (non-forested)	0
Total	3,814.50

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	26977.21	0.36	0	0	0	0	26977.21	0.36
CO ₂ Emission from fertilizer	3607.12	0.05	0	0	0	0	3607.12	0.05
NO ₂ Emission from peat	0	0	0	0	0	0	0	0
NO ₂ Emission from fertilizer	2604.76	0.04	0	0	0	0	2604.76	0.04
Fuel Consumption	1358.34	0.02	0	0	0	0	1358.34	0.02
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-35482.28	-9.36	0	0	0	0	-35482.28	-9.36

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Conservation Sequestration	-223.38	-0.06	0	0	0	0	-223.38	-0.06
Total	-1158.24	-0.31	0	0	1403.26	0	245.03	

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	6719.49	0.09
Fuel Consumption	1000.80	0.01
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	-35.19	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	7685.10	0.10

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	-
PK from other source	-
Fuel Consumptions	-
Total Crusher emissions	-

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	100
Divert to anaerobic diversion (%)	0

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

Appendix D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	Aug-19	1,448.40	126.50	1,574.90
2	Sep-19	6,311.15	492.24	6,803.39
3	Oct-19	7,669.78	355.20	8,024.98
4	Nov-19	6,729.68	342.44	7,072.12
5	Dec-19	6,571.59	256.82	6,828.41
6	Jan-20	3,500.50	150.62	3,651.12
7	Feb-20	2,098.33	200.95	2,299.28
8	Mar-20	2,048.33	234.77	2,283.10
9	Apr-20	3,196.68	468.37	3,665.05
10	May-20	4,393.95	443.07	4,837.02
11	Jun-20	5,958.22	541.62	6,499.84
12	Jul-20	6,540.45	476.50	7,016.95
	Total	56,467.06	4,089.10	60,556.16
Note:				

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Aug-19	393.56	69.29
2	Sep-19	1,555.36	338.27
3	Oct-19	1,813.37	426.68
4	Nov-19	1,633.05	358.23
5	Dec-19	1,393.13	295.83
6	Jan-20	770.08	133.25
7	Feb-20	483.91	77.14
8	Mar-20	503.92	93.40
9	Apr-20	793.47	169.24
10	May-20	975.58	211.73
11	Jun-20	1,407.38	265.28
12	Jul-20	1,480.19	273.36

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Total	13,203.01	2,711.70
Note:		

C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Undisclosed 1	-	1,794.73	
2	Undisclosed 2	-		665.49
3	Undisclosed 3	-		171.61
Total			1,794.73	837.10
Note:				

D. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Undisclosed 4	ISCC	10,323.90	-
Total			10,323.90	-
Note:				

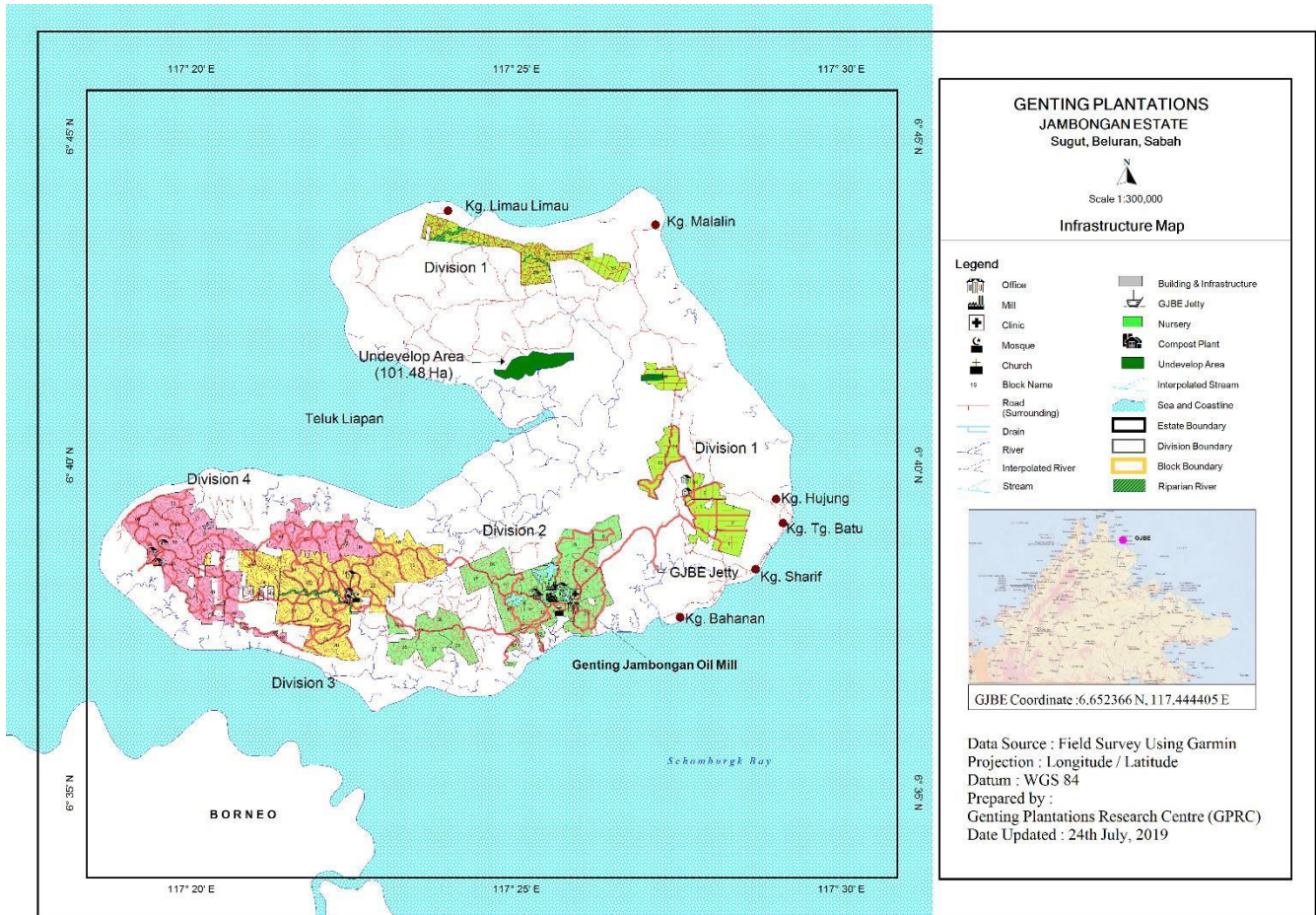
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E. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Undisclosed 5	988.65	
2	Undisclosed 6		937.35
3	Undisclosed 7		907.36
Total		988.65	1,844.71
Note:			

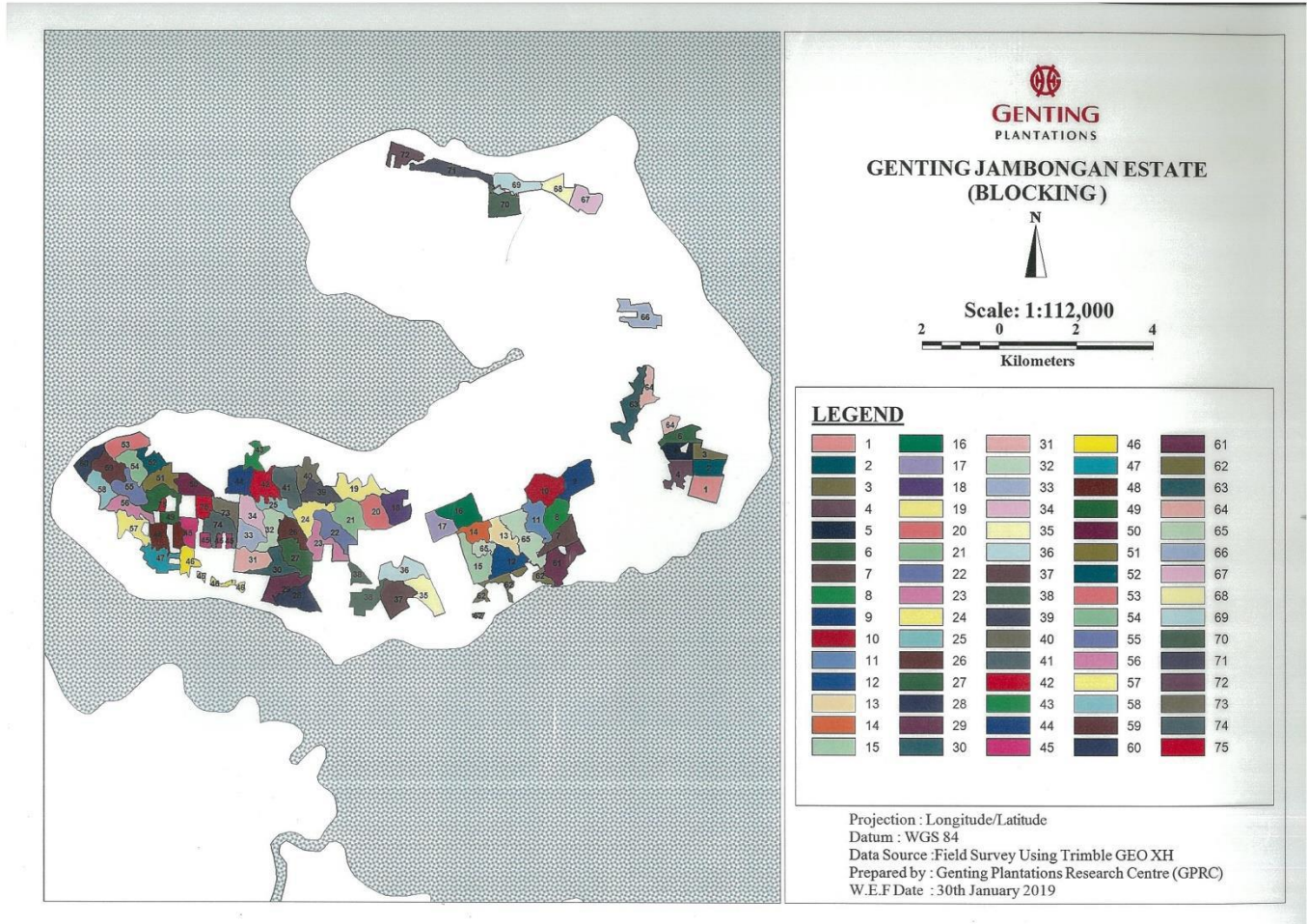
F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil		
Note:			

Appendix E: Location Map of Certification Unit and Supply bases

Genting Jambongan Oil Mill and Genting Jambongan Estate



Appendix F: Jambongan Estate Field Map



Appendix G: List of Smallholder Sampled

Not applicable

Appendix H: 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