

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (ASA1)**
- Recertification Assessment
- Extension of Scope

Client Company name (Parent Company): Genting Plantations Berhad
Client company Address: 10 th Floor, Wisma Genting, Jalan Sultan Ismail 50250 Kuala Lumpur, Malaysia
Certification Unit: Genting Selama Estate Location of Certification Unit: KM6, Jalan Serdang – Selama 09800 Serdang, Kedah, 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 Selama Estate		
Location / Address	KM6, Jalan Serdang – Selama, 09800 Serdang, Kedah, Malaysia.		
Website	http://www.gentingplantations.com		
Management Representative	Mr. Arunan Kandasamy	E-mail	arunan.kandasamy@genting.com
Telephone	+603 2333 6401	Facsimile	N/A

2. Certification Information			
Certificate Number	RSPO 709623	Date of First Certification	22/10/2019
		Certificate Start Date	22/10/2019
		Certificate Expiry Date	21/10/2024
Scope of Certification	Production of Fresh Fruit Bunches		
Visit Objectives	The objective of the assessment is to conduct Annual surveillance Audit 1 to confirm that the elements of the proposed scope of registration and the management system are conforming the requirements of the assessment criteria. The assessment is also to confirm that the organization has effectively implemented and addressed the management system and has the ability to meet applicable statutory and regulatory, contractual requirements, organization policies and wherever are applicable.		
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 checked="" type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE119-60203936	ISCC EU	ASG Cert GmbH	05/06/2021
MSPO 709624	MSPO – Part 3 of MS2530	BSI Services Malaysia Sdn Bhd	09/10/2024

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4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Genting Selama Estate	KM6, Jalan Serdang – Selama, Serdang 09800, Kedah, Malaysia	5° 13' 19.82" N	100° 39' 25.16" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Genting Selama Estate	1,774.32	9.97	46.55	1,830.84	96.91%
Total	1,774.32	9.97	46.55	1,830.84	96.91%

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Genting Selama Estate	242.61	165.04	398.59	129.28	838.80	1531.71	242.61
Total (ha)	242.61	165.04	398.59	129.28	838.80	1531.71	242.61

Note:
**Only Mature area is considered as production area
For planting age 26-30, there is 317.60ha due for replanting

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (Oct 19 – Sep 20)	Actual (Oct 19 – Jun 20)		Forecast (Oct 20 – Sep 21)
		<i>Previous license period (N/A)</i>	<i>Current license period (Oct 19 – Jun 20)</i>	
Selama Estate	35,600.00	N/A	23,957.95	34,443.00
Total	35,600.00	23,957.95		34,443.00

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8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *				
Estate	Tonnage / year			
	Estimated (Oct 19 – Sep 20)	Actual (Oct 19 – Jun 20)		Forecast (Oct 20 – Sep 21)
	N/A	<i>Previous license period</i> (N/A)	<i>Current license period</i> (Oct 19 – Jun 20)	N/A
Non Applicable				
Total				

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable				
Independent FFB Supplier	Tonnage / year			
	Estimated (Oct 19 – Sep 20)	Actual (Oct 19 – Jun 20)		Forecast (Oct 20 – Sep 21)
		<i>Previous license period</i> (N/A)	<i>Current license period</i> (Oct 19 – Jun 20)	
Not Applicable				
Total				

10. Certified Tonnage				
	Estimated (Oct 19 – Sep 20)	Actual (Oct 19 – Jun 20)		Forecast (Oct 20 – Sep 21)
	FFB	FFB		FFB
Mill Capacity: Not Applicable	35,600.00	<i>Previous license period</i> (N/A)	<i>Current license period</i> (Oct 19 – Jun 20)	34,443.00
		N/A	23,957.95	
SCC Model: IP	CPO (OER: 20.0%)	CPO (OER: 20.5%)		CPO (OER: 20.5%)
	7,120.00	N/A	4,911.38	7,060.82
	PK (KER: 5.0%)	PK (KER: 5.5 %)		PK (KER: 5.5 %)
	1,780.00	N/A	1,317.69	1,894.37

Note: OER and KER is industry default value

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11. Actual Sold Volume (CPO)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	N/A	N/A	N/A	N/A	N/A
Previous License period					
CPO (MT)	N/A	N/A	N/A	N/A	N/A

12. Actual Sold Volume (PK)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	N/A	N/A	N/A	N/A	N/A
Previous License period					
PK (MT)	N/A	N/A	N/A	N/A	N/A

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

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.
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Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
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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 assessment was conducted from 16/07/2020 – 17/07/2020. 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 offsite due to reducing the risk of the current Covid-19 Pandemic.

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. Malaysia National Interpretation 2019 for RSPO Principles & Criteria 2018 for the Production of Sustainable Palm Oil were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

This is a single estate certification. No sampling is required for this assessment.

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 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.

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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)
Selama Estate	√	√	√	√	√

Tentative Date of Next Visit: July 1, 2021- July 2, 2021

Total No. of Mandays: 4.5

2.2 BSI Assessment Team:

Team Member Name	Role	Qualifications
Nicholas Cheong	Team Leader	Holds a Master of Environmental Management from the University Putra Malaysia and Bachelor of Science (Food Science) from Charles Sturt University Australia. He has more than 7 years of working experience in sustainability auditing for palm oil industry and hydropower plant. He is also an expert in Greenhouse Gas emissions accounting. He has also 2 years of working experience in wastewater treatment and operations. He has completed the ISO9001, ISO14001, RSPO P&C Lead Auditor course, RSPO Supply Chain Lead Auditor Course, RBA Labor & Ethic Lead Auditor Course and MSPO Awareness Training. In his previous certification body, he was a Lead Assessor for Clean Development Mechanism, World Commission of Dam and ISCC. He had been involved in Sustainable Palm Oil auditing for more than 5 years. In this assessment, the focus element includes legal requirements, social and workers welfare, workers health and safety and supply chain. He is fluent in Bahasa Malaysia and English.
Muhamad Naqiuddin Mazeli	Team Member	Holds a Bachelor of Science Horticulture at University Putra Malaysia. He started his career in 2009 as Researcher at Sime Darby Research Seed Centre and manage for Quality control for seed production for paddy, chilli and corn with collaboration with Malaysian Agricultural Research and Development Institute (MARDI) for 4 years. During the period, he was also involved with Nestle project on Red Rice production. He later joins the Sime Darby Plantation Berhad Sustainability Team in 2013 as Sustainability Executive. Joining the sustainability team, he managed, implemented and monitored the

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		RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training and internal audits related to RSPO, MSPO and other certifications where applicable to the operations within Sime Darby Plantation. He is a trained Safety Officer and he managed the Occupation Safety and Health of Northern Region Sime Darby Plantation Berhad operations. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health and workers consultation.
Ragu Samy A/L Erulappan	Team Member	Holds a Bachelor Degree in Civil Engineering from University Technology Malaysia. He has more than 5 years working experience as environmental and occupational health safety engineer. He has more than 5 years of auditing experience in ISO 9001:2008, ISO 14001, IS 45001, C-TPAT (Supply Chain Security), SCAN, EICC/RBA, RSPO and GDPMD (Good Distribution Practice for Medical Devices). He has completed ISO 9001:2008 Quality Management System Lead Auditor Course, ISO 14001 Lead Auditor Course, ISO 45001 Lead Auditor Training and Endorsed RSPO P&C Lead Auditor Course. In this assessment he assessed the mill and estate OSH, Legal, and Environment aspects. He is fluent in Bahasa Malaysia, English and Tamil.

Accompanying Persons:

Name	Role
Hu Ning Shing	Qualifying Reviewer for Nicholas Cheong

2.3 Assessment Plan

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

Date	Time	Subjects	(NC)	(MN)	(RS)	(NS)
Wednesday, 15/07/2020	pm	Travel from Genting Bukit Sembilan to Ritz Garden Hotel Parit Buntar	√	√	√	√
Thursday, 15/07/2020	0730 – 0830	Travel from hotel to Genting Selama Estate	√	√	√	√
	0830 – 0900	Genting Selama Estate: Opening Meeting: <ul style="list-style-type: none"> • Safety briefing and presentation by Genting Team (if any) • Presentation by BSI – introduction of team member and assessment agenda • Confirmation of assessment scope and finalized stakeholders list for interview 	√	√	√	√

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Date	Time	Subjects	(NC)	(MN)	(RS)	(NS)
	0900 – 1230	Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, SEIA requirement, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management, housing compound.	√	√	√	√
	1230 – 1330	Lunch				
	1300 – 1700	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/ workers representatives, new planting, CIP and implementation etc).	√	√	√	√
	1700 – 1730	Interim closing	√	√	√	√
Friday 16/07/2020	0730 – 0830	Travel from hotel to Genting Selama Estate	√	√	√	√
	0830 – 1100	Continue documentation review and outstanding issues	√	√	√	√
	0930 – 1000	Stakeholder consultation	√			√
	1100 – 1200	Preparation of closing meeting	√	√	√	√
	1200 – 1230	Closing Meeting	√	√	√	√
	1230	End of assessment				

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?	The time bound plan has included all the subsidiaries of Genting Plantations Berhad. The TBP includes all units in Malaysia and Indonesia. The detail of the subsidiaries and the management units is as per Appendix B.	Complied
Have all the estates and mills certified within five years after obtaining RSPO membership?	The last management units that are planned to be certified will be in Oct 2023. As per the TBP in Appendix B, those management units that are expected to be certified in 2023 are having HGU issues. Hence despite the plan is more than 5 years from 2017 (where the current RSPO P&C Certification System 2017), the assessment team deem it is acceptable due to the expected delay in HGU issuance. The details of expected certifying timeline and reason of the timeline is provided in Appendix B.	Complied
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.	There is no new acquisition as of June 2020	Complied
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?	The changes are for: <ol style="list-style-type: none"> 1. Delay in Genting Indah Oil Mill due to pending on RaCP process. 2. Delay in KUI Oil mill due to HCSA progress. 3. Delay in Agro Abadi oil mill due to HGU in progress and new mill construction. 4. Advance in Globalindo oil mill. 5. Advance in UAI oil mill. 6. Delay in Golden Hill Oil mill due to HGU issuance. 7. Delay in KMJ Oil mill due to HGU issuance. 8. Delay in CSC Oil mill due to HGU issuance. 	Complied

Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	There is no isolated lapses in implementing the plan. The delays are mainly due to RaCP progress, HGU issuance and completing HCSA.	Complied
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	There is no fundamental failure in implementing the plan. The delays are mainly due to RaCP progress, HGU issuance and completing HCSA. At the time of the assessment the Genting Plantations Bhd is still complying with the RSPO P&C Certification System 2017.	Complied
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. 	The RSPO RaCP was evaluated. Resolution on land conflicts with RSPO are deemed actively. As per RSPO Secretariat latest information, there is only 4 sites that requires resolution. The details are as below: i) PT Globalindo Agung Lestari – non corporate clearing category, LUCA under review ii) PT Sepanjang Inti Surya Mulia – Remediation only. Remediation Approved. iii) Genting Jambangan – Remediation only. Remediation Approved. iv) Genting Kencana – RaCP – on going. The concept note re-submitted to the Panel. v) Genting Permai – not applicable since the liability under Genting Kencana	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	2 NPP was submitted – PT Sawit Mitra Abadi (additional planting area) and PT Agro Abadi Cemerlang. Both NPP commenting period has ended without any comment. Other uncertified unit that requires NPP includes KIU management unit and UAI management unit.	Complied
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.	The RSPO RaCP was evaluated. Resolution on land conflicts with RSPO are deemed actively. As per RSPO Secretariat latest information, there is only 4 sites that requires resolution. The details are as below: i) PT Globalindo Agung Lestari – non corporate clearing category, LUCA under review ii) PT Sepanjang Inti Surya Mulia – Remediation only. Remediation Approved. iii) Genting Jambangan – Remediation only. Remediation Approved. iv) Genting Kencana – RaCP – on going. The concept note re-submitted to the Panel. v) Genting Permai – not applicable since the liability under Genting Kencana	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labor dispute that has been noticed by the assessment team.	Complied

Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance that has been noticed by the assessment team.	Complied
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Internal audit has been conducted at operating units that is not certified. Positive assurance statement was issued for Genting Permai Estate, Genting Indah Estate, Genting Kencana Estate, PT Palma Agro Lestari Jaya, PT Surya Agro Palma, PT Agro Abadi Cemerlang, PT Citra Sawit Cemerlang, PT Globalindo Agung Lestari, PT United Agro Indonesia, PT Kharisma Inti Usaha, PT Dwie Warna Karya, PT Kapuas Maju Jaya and PT Susanti Permai	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Stakeholder has been conducted accordingly especially those uncertified unit that has undergone HCSA assessment.	Complied

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.	Not applicable to the certification unit	N/A

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 two (2) Critical nonconformities; four (4) Minor nonconformities and four (4) Opportunity For Improvement raised. The Genting Selama Estate Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	1935878-202007-M1	Clause & Category (Major / Minor)	3.6.2 (Critical)

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Date Issued	17/07/2020	Due Date	15/10/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	13/10/2020
Statement of Nonconformity:	Health and safety mitigation measures was not adequately implemented.		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	<p>Genting Selama Estate:</p> <ol style="list-style-type: none"> 1. Tractor (plate no. KCF 5858) was operating at the nursery with malfunction horn & rear light. 2. Workshop: Machine safeguarding (engineering control) for car wash sprayer pump was not fully adequate. Only one angle of exposed rotating belt was provided secured fencing. There are rotating angles which are still exposed and at risk. 		
Corrections:	<ol style="list-style-type: none"> 1. Repairs to the tractor had been completed by the foreman. 2. The exposed rotating belt were installed with protective guard fencing. 		
Root Cause Analysis:	Inadequate awareness and competency by the Workplace Inspection Team, which caused lack of checking and verification by the team on the appropriate mitigations measures.		
Corrective Actions:	Training was conducted for the Workplace Inspection Team to improve the competency to identify issues and appropriate mitigations measures.		
Assessment Conclusion:	<p>The training records was verified by the audit team. The corrective action taken should be able to eliminate the competency issue of the Workplace Inspection Team. Training schedule was developed to manage the required training to continuously improve the awareness and competency.</p> <p>Due to the current Covid-19 pandemic which had restricted travelling, the closure was conducted offsite by document review. The continuous effective implementation will be evaluated in the next assessment.</p>		

Non-conformity			
NCR Ref #	1935878-202007-M2	Clause & Category (Major / Minor)	4.1.1 (Critical)
Date Issued	17/07/2020	Due Date	15/10/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	13/10/2020
Statement of Nonconformity:	The policy is not yet finalized.		
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.		

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Objective Evidence:	The policy on prohibiting retaliation against Human Rights Defenders (HRD) is not yet established and implemented.
Corrections:	Liaise with top management to get the policy approved by 31 st Aug 2020.
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 unable to conduct physical meeting, SD (Sustainability Department) to arrange online meeting/discussion with top management for discussion on new company policies.
Assessment Conclusion:	Genting Plantations Berhad has revised the Social Policy and undersigned by the CEO on 14/09/2020. The policy clearly commit that Genting Plantations Berhad prohibits retaliation against human rights defenders. The policy briefing records provided confirms the policy has been communicated at operations site. Due to the current Covid-19 pandemic which had restricted travelling, the closure was conducted offsite by document review. The continuous effective implementation will be evaluated in the next assessment.

Non-conformity			
NCR Ref #	1935878-202007-N1	Clause & Category (Major / Minor)	1.1.5 (Minor)
Date Issued	17/07/2020	Due Date	Next Surveillance audit
Closed (Yes / No)	No	Date of nonconformity Closure	Next Surveillance audit
Statement of Nonconformity:	The stakeholders details and nomination is not complete as per the operation scope of Genting Selama.		
Requirement Reference:	There is a current list of contact and details of stakeholders and their nominated representatives.		
Objective Evidence:	The operation of Genting Selama is located at Kedah and Perak. The stakeholder list does not include stakeholders from both states (e.g. JTK for Kedah, MAPA for Kedah, DOSH for Perak, DOE for Perak, Lands Department of Perak).		
Corrections:	The stakeholder list has updated to include the government officials from both Kedah & Perak.		
Root Cause Analysis:	Inadequate awareness on 'Identification and Verification of Stakeholders' procedure dated 18 Jan 2018. Misunderstood that stakeholders of government officials are applicable to main division only (which is located at Kedah).		
Corrective Actions:	Management personnel to be trained on the 'Identification and Verification of Stakeholder' based on SMP-GPB-32 The stakeholder lists to be verified during Internal Audit.		

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Assessment Conclusion:	The correction is verified and include the relevant stakeholders. The implementation of corrective actions will be evaluated during the next surveillance assessment.
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Non-conformity			
NCR Ref #	1935878-202007-N2	Clause & Category (Major / Minor)	3.4.2 (Minor)
Date Issued	17/07/2020	Due Date	Next Surveillance audit
Closed (Yes / No)	No	Date of nonconformity Closure	Next Surveillance audit
Statement of Nonconformity:	The management plan is not implemented effectively.		
Requirement Reference:	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.		
Objective Evidence:	Grievance received from the shopkeeper regarding rental; debt left behind by the absconded workers and transporting workers after completing of work visa is not found in any action plan with proper resolution timeline, monitoring and responsible person.		
Corrections:	The issues accordingly (for timeline, monitoring and PIC) is updated in management plan.		
Root Cause Analysis:	Improper updating/monitoring system by the management due to misunderstanding/ confusion (on timeline, monitoring & PIC) between the Social Management Plan, SIA report, Complaint Book& Stakeholder Meeting.		
Corrective Actions:	Training by Sustainability Department on the social management plan system at all relevant areas ie SIA report, Complaint Book& Stakeholder Meeting.		
Assessment Conclusion:	The correction is verified and include the missing social issues. The implementation of corrective actions will be evaluated during the next surveillance assessment.		

Non-conformity			
NCR Ref #	1935878-202007-N3	Clause & Category (Major / Minor)	3.5.1 (Minor)
Date Issued	17/07/2020	Due Date	Next Surveillance audit
Closed (Yes / No)	No	Date of nonconformity Closure	Next Surveillance audit
Statement of Nonconformity:	Employment recruitment procedure is not available.		

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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 procedure for Foreign labour is not yet finalized and available. This resulted that there no clear procedure how Genting Plantations will manage the employment of Indian workers through 2 local agents Adaama Services and Chumylee Enterprise especially the local Malaysia agents that have sub-agent at sourcing country the workers – MRS Air Travel Private Limited and Airciti Tours & Travel (India) Pvt Ltd.
Corrections:	Liaise with top management to get the procedure approved by 31 st Aug 2020.
Root Cause Analysis:	The draft procedure which was initially prepared in 2018, was updated again in early 2020 to include some latest requirements as per MYNI 2019. However, the approval by top management was delayed due to Covid19/MCO as unable to conduct physical meeting.
Corrective Actions:	In the event unable to conduct physical meeting, SD (Sustainability Department) to arrange online meeting/discussion with top management for discussion on new/amended company procedures.
Assessment Conclusion:	The implementation of corrective actions will be evaluated during the next surveillance assessment.

Non-conformity			
NCR Ref #	1935878-202007-N4	Clause & Category (Major / Minor)	7.3.2 (Minor)
Date Issued	17/07/2020	Due Date	Next Surveillance audit
Closed (Yes / No)	No	Date of nonconformity Closure	Next Surveillance audit
Statement of Nonconformity:	Found the disposal of waste inadequately demonstrated.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<p>The below actions were not followed according to Scheduled waste management procedure (SMP-GPB-11);Rev 01; dated 11/6/2018.</p> <ul style="list-style-type: none"> • Sighted CU stored scheduled waste (SW 404) more than 180 days as per disposal record (SW 404) was on 21/4/2020 and previously disposal was on 13/7/2019. • Found paint container and lubricant container in landfill (Field OP98) during site verification. 		
Corrections:	<ol style="list-style-type: none"> 1. Write to DOE requesting for 'extension of storage' from 13/01/2020 until next collection (which done on 21/04/2020). 2. Dedicated workers were used to segregate the scheduled wastes from domestic wastes. The scheduled wastes were stored at SW store, and recorded accordingly. 		

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Root Cause Analysis:	<ol style="list-style-type: none"> 1. Inadequate procedure on waste management. 2. Inadequate training on waste management to the PIC & residents at the division.
Corrective Actions:	<ol style="list-style-type: none"> 1. Amend scheduled waste procedure to include the element on requesting for 'extension of storage from DOE'. 2. To retrain all staff, workers and residents at the division on SW Management and awareness.
Assessment Conclusion:	<p>The corrections has been implemented.</p> <p>The implementation of corrective actions will be evaluated during the next surveillance assessment.</p>

Opportunity for Improvements	
OFI #	Description
OFI 1	6.5.3 – There is no new mother identified in this assessment. Hence no consultation was required. However, the mechanism for the consultation can be improved.
OFI 2	6.6.1 – During the field assessment, the assessment team was informed regarding overtime disputes. Verification of the check roll book shows that the worker has only 8 hours of Overtime. Further verification with the management indicated that the overtime usually require Estate manager approval but the current practice is offered and accepted base on verbal. Implementation on overtime management could be improved to ensure proper hours is approved by estate manager and proper acceptance of workers.
OFI 3	6.7.2. – First Aid Kit location at the Workshop could be further improved.
OFI 4	7.12.4 – The management plan to protect and/or enhance HCVs, HCS forests and identification of the RTE species in estate need to be improve.

Positive Findings	
PF #	Description
PF 1	Positive stakeholders engagement
PF 2	GAP implementation – water slit pit implementation

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1804958-201905-N1	Clause & Category (Major / Minor)	6.1.4 (Minor)
Closed (Yes / No)	23/07/2019	Date of nonconformity Closure	17/07/2020
Statement of Nonconformity:	The plan was not fully updated and reviewed as necessary		

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Requirement Reference:	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties
Objective Evidence:	The latest established Social Management and Monitoring Plan of Genting Selama Estate (GSLE) were updates on 21/03/2019 which includes the procedures and responsibilities for implementation. However the plan does not synchronize with the external stakeholder which was conducted on 28/03/2019 and external stakeholder briefing conducted on 11/04/2019. The plan too did not incorporate the recommendation from SIA study conducted by Genting HQ Sustainability personnel on 24-25/04/2019 as per RSPO & MSPO Social Impact Assessment (SIA) and Human Rights Impact Assessment (HRIM) Report, Genting Selama Estate (GSLE) report prepares by Sustainability Department dated 30/04/2019
Corrections	Immediately update the Social Management & Monitoring Plan and to include current issues arise during Internal/External Stakeholder Meeting & SIA report.
Root cause analysis	Improper updating system by management on Social Management & Monitoring Plan.
Corrective Actions:	Briefing on Social Management and Monitoring Plan to review and updates as necessary once receive of any related social matters.
Assessment Conclusion:	<p>The overall social management plan is updated once every 2 years through the Social Impact Assessment & Human Rights Impact Assessment. The results of the stakeholder interview is the basis to developed the management and monitoring plan. The implementation of the 2019 recommended management plan was sighted and reviewed annually.</p> <p>However, the management plan did not include all comments received from stakeholder such as grievance received from the store keeper regarding rental; debt left behind by the absconded workers and transporting workers after completing of work visa is not found in any action plan with proper resolution timeline, monitoring and responsible person. Hence non-compliance has be re-raised in indicator 3.4.2.</p>

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1804958-201905-N1	Minor	6.1.4 (P&C 2013)	23/07/2019	Open and raised in indicator 3.4.2
1935878-202007-M1	Critical	3.6.2	17/07/2020	Closed
1935878-202007-M2	Critical	4.1.1	17/07/2020	Closed

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1935878-202007-N1	Minor	1.1.5	17/07/2020	Next Surveillance
1935878-202007-N2	Minor	3.4.2	17/07/2020	Next Surveillance
1935878-202007-N3	Minor	3.5.1	17/07/2020	Next Surveillance
1935878-202007-N4	Minor	7.3.2	17/07/2020	Next Surveillance

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 Selama Estate Certification Unit’s environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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

List of Stakeholders contacted	
Internal Stakeholders Gender leader Foreign workers Local workers Auxiliary police Female staff	Union/Contractors/Communities NUPW – Kedah/Perak State Branch Cattle owners / surrounding smallholders Seribu Relong Village communities Sungai Salleh Village communities Contractors
Government Departments -	NGO -

Stakeholders comment	
1	Feedbacks: NUPW Kedah Branch There were no negative comment received from the NUPW Secretariat of Kedah Branch. They have received good operation from the certificate holder. There were no reports that the certificate holder is preventing workers from joining the union.
	Management Responses: No further comments from the management team
	Audit Team Findings:



	No comments from the assessment team
2	Feedbacks: Seribu Relong village communities There were no negative comment received from the village representative. The villagers has no issue on access.
	Management Responses: No further comments from the management team
	Audit Team Findings: No comments from the assessment team
3	Feedbacks: Seribu Relong village communities There were no negative comment received from the village representative. The villagers has no issue on access.
	Management Responses: No further comments from the management team
	Audit Team Findings: No comments from the assessment team
4	Feedbacks: Surrounding smallholders Smallholders are pleased that for any complaint raised, it has been managed appropriately by the estate manager.
	Management Responses: No further comments from the management team
	Audit Team Findings: No comments from the assessment team
5	Feedbacks: Contractors There were no negative comment received from the contractors. The working arrangement and cooperation with the estate is good.
	Management Responses: No further comments from the management team
	Audit Team Findings: No comments from the assessment team

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
N/A					
Not applicable as the land has been developed since 1980s and had entered into replanting.					

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

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.

Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Genting Selama Estate has complied with the RSPO P&C Malaysia National Interpretation 2019 for RSPO Principles and Criteria 2018 for Sustainable Palm Oil and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Genting Selama Estate is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Nicholas Cheong	Name: Arunan Kandasamy
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: Genting Plantations Bhd
Title: Lead Auditor	Title: SVP-Plantation (Malaysia)
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 24/11/2020	Date: 27/11/2020

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>	Genting Plantations has established the Procedures on Request and Responses rev 0 dated 14/08/2014 to manage respond to the information requested by stakeholders. The information that can be requested includes – Company annual report; Group policies; Report related to EAI, EIA; External audit reports; Pollution prevention plan; continuous improvement plan; negotiation and compensation procedure; and sexual harassment procedure.	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	There was no such request recorded since the last assessment. There was 1 request in 2017 from nearby community requested for the estate’s land title to verify the land area.	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	There was no such request recorded since the last assessment.	Complied
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 Procedure for Consultation and Communication rev 02 dated 23/02/2018 was developed for effective internal and external communication and responding to communications from local communities and other affected or interested parties.</p> <p>The nominated representative of Bukit Sembilan estate is Mr Izuddin, Estate Manager dated 01/01/2020.</p> <p>Interview stakeholders demonstrate that there is 2 way communication either formal or informal with estate management.</p>	Complied

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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>The current stakeholder list includes stakeholders of the nearby communities, authorities department, trade union and suppliers.</p> <p>The operation of Genting Selama is located at Kedah and Perak. The stakeholder list does not include stakeholders especially governmental department from both states.</p>	Non-compliance
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>The Ethical Conduct and Integrity Policy established on 22/06/2015 was replaced with Code of Conduct and Ethics for Employees and Directors dated 01/06/2020. All employee within Genting Plantations Group is adhere to follow the policy.</p> <p>The code of conduct is operated in conjunction with Whistle-blower policy revised on 01/06/2020 and Anti-Bribery & Corruption System Policy dated 01/06/2020.</p>	Complied
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>Internal audit for RSPO requirements and financial implementation is conducted annually to ensure the business practices is implemented. The last RSPO internal audit was conducted on 01-02/07/2020 while the finance internal audit was conducted on 16/10/2019.</p> <p>Sample of ramp repairing work dated 11/05/2020 was verified. The contract was awarded base on quotation.</p>	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	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>Genting Selama Estate had continued to comply with the legal requirements applicable to its operation as identified in the Legal Requirements Register, Doc. No. SMP-GPB-22 last approved on 16/03/2020. Compliance to each applicable law and regulation is monitored by the operating units and the sustainability team.</p>	Complied

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		<p>Genting Selama Estate had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were:</p> <ul style="list-style-type: none"> a) MPOB license No. 50875650200 valid until 31/05/2021 for "Menjual dan Mengalih" FFB. b) MPOB license No. 524812011000 valid until 30/11/2020 for "Menghasilkan, mejual dan megalith, menyimpan biji (seedling)- Nursery. c) Diesel Storage Permit, S/N P: K018916, Diesel Quantity:8100 Litre, permit valid until 23/10/2020 d) Certificate of Fitness for Air Receiver, KD PMT 5021, valid until 18/09/2020. e) Certificate of Fitness for Air Receiver, KD PMT 5022, valid until 18/09/2020. f) f) Certificate of Fitness for Air Receiver, KD PMT 4674, valid until 04/09/2021 	
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>Genting Selama Estate continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that are applicable to the CU operation. Details of compliance were evaluated once a year as per in Legal Requirements Register, Doc. No. SMP-GPB-22 last approved on 16/03/2020.</p> <p>The Legal Register includes Occupational Safety and Health Act 1994, Pesticide Act 1974, Environmental Quality Act 1974, Occupational Safety and Health (Noise Exposure) Regulations 2019 and other related legal requirements.</p> <p>Tracking system to identify changes in the relevant regulations is available through the head office, website information and is communicated. On the site verification, interviews with office</p>	Complied

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		personnel and records indicate that the system is appropriate to the operation. Tracking system on any changes in the law had been well implemented.	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	Legal or authorised boundaries are clearly demarcated and visibly maintained sampling in field OP2019D the boundaries between Genting Selama estate (Chong Meng Div) and Hj Abdul Hamid B. Utuh was clearly demarcated and visibly maintained using trench as the boundary.	Complied
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	List of contractors including foreign labour agency are available. Copies of agreement are retained. The list of contractors are maintained according to the stakeholders list.	Complied
2.2.2	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. - Minor compliance -	This certification is a single estate certification. There is no purchase of FFB. Sample contract of Kamala Devi A/P Krishnan dated 01/01/2020 was sighted and clause related to meeting Malaysian Legal requirements are available in the terms and conditions.	Complied
2.2.3	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. - Minor compliance -	Sample contract with Kamala Devi A/P Krishnan dated 01/01/2020 was sighted and it has included clause of no minor below 18 years old shall be hired; workers have to be provided with fair legal contracts; and shall not practice any kind of discrimination or forced labour.	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	(C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> Information on geo-location of FFB origins 	Not applicable as this is a single estate certification.	Not Applicable

	<ul style="list-style-type: none"> 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>														
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>	Not applicable as this is a single estate certification.	Not Applicable												
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>	Business plan is documented in a form of annual budget which has information on FFB projection and operation cost. For the estates, the average production cost per mt FFB is around RM200/mt. The expenses of the operating units are reported monthly to GPB HQ through "Plantation Report" as a monitoring mechanism	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>Annual replanting programme was available at each visited estates which included the 5 years projection. The programme are as follows:-</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Area (Ha)</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>83.02</td> </tr> <tr> <td>2022</td> <td>0</td> </tr> <tr> <td>2023</td> <td>222.17</td> </tr> <tr> <td>2024</td> <td>96.46</td> </tr> <tr> <td>2025</td> <td>0</td> </tr> </tbody> </table>	Year	Area (Ha)	2021	83.02	2022	0	2023	222.17	2024	96.46	2025	0	Complied
Year	Area (Ha)														
2021	83.02														
2022	0														
2023	222.17														
2024	96.46														
2025	0														

		2026	41.36	
		2027	122.32	
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Management review was last conducted on 06/02/2020 at Genting Selama estate attended by 5 key personnel from the operating units. Based on the minutes of meeting, among the agenda discussed were:</p> <ul style="list-style-type: none"> • Minutes/actions of previous meeting • RSPO & MSPO audit schedule and certification status • Changes and improvement on sustainability management system • Results of internal audits • Complaints and grievances • Enquiry register • Stakeholder meeting/minutes • Greenhouse gasses • Resource and training requirements • Sustainability policies • Review of effectiveness in achieving quality, environmental, social, safety and health objectives • Compliance with legal requirements • Supply chain and traceability • Preventive and corrective actions • Recommendations for improvement 		Complied
<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>				

3.2.1	<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.</p> <p>- Critical (Major) compliance -</p>	<p>Among the continuous improvement plan verified against budget at GSLE (Genting Selama Estate) certification unit are:</p> <ul style="list-style-type: none"> • To minimise environmental impact on availability of ground water by minimise soil erosion and maintain riparian reserve • Waste reduction by recycling activity • Improving the machinery efficiency therefore fossil fuel usage is optimised • To improve the understanding of complaint procedure amongst stakeholders through stakeholders meeting • Maximising yield of crop 	Complied
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>The RSPO metrics is no yet finalized. Hence the certificate holder has not report to the Secretariat.</p>	Not Applicable
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
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 GSLE has documented and maintained its own operational procedure covering all work stations from Field operation until FFB sent out. It is a three tier documentation level: Procedure Manual, System Procedure, Standard Operating Manual, Safe Operating Procedure and Environmental Control Procedure.</p>	Complied

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		<p>On the estates front three sets of manual had been developed and used daily in their operations, namely:</p> <ul style="list-style-type: none"> • Sustainability Management Procedure Manual enumerating 32 topics, latest update on 11/02/2019. • OSH Manual covers accident notification, PPE, health and safety programme, Emergency Response Plan, safety signage, OSH committee, HIRARC, and • Oil Palm Manual consisting of SOP describing activities at estate, example: <ul style="list-style-type: none"> - OPM 1: Land clearing, preparation, planting and legume covers establishment - OPM 2: Oil palm nursery practices - OPM 3: Planting density and planting technique - OPM 4: Soil conservation and terracing - OPM 5: Pest and disease - OPM 6: Weeding-weed management - OPM 7: Manuring of oil palm - OPM11: Harvesting - OPM 13: Managing difficult soils 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>The mechanism to check consistent implementation for all activities carried out in the estate was through internal audit. Verified the internal audit report at GSLE. Additionally, Assistant Managers and Field Supervisors of the Operating Unit during field rounds do ensure Safe Work Practices (By SHO) and Standard Operating Procedures are followed.</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p>	<p>All records related to Internal Audit, Agronomist and Estate Inspector visit was maintained and available at estate offices.</p>	Complied

	- Minor Compliance -		
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.			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>The baseline SIA was conducted from 11/05/2009 – 11/06/2009 by University Kebangsaan Malaysia’s student engaged by Genting Plantations.</p> <p>Subsequent to the baseline an updated SIA and Human Rights Impact Assessment was conducted from 24-25/04/2019. The update assessments are conducted internally by Genting Plantations Group Sustainability team. The purpose of the assessment is to evaluate the current impact to the workers and surrounding communities. A list of interviewed parties is provided in the report.</p>	Complied
3.4.2	<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> <p>- Minor Compliance -</p>	<p>The broader management plan is developed following to the findings of the impact assessment. The broader management plan includes workers’ agreement; pay and conditions; maintaining of housing facility; stakeholder engagement; management of grievances; monitoring of sexual harassment and continuous monitoring of the estate’s social performance by conducting independent assessment by the Sustainability Department.</p> <p>The management plan is not implemented effectively. Example, grievance received from the store keeper regarding rental; debt left behind by the absconded workers and transporting workers after completing of work visa is not found in any action plan with proper resolution timeline, monitoring and responsible person.</p>	Non-compliance
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 overall social management plan is updated once every 2 years through the Social Impact Assessment & Human Rights Impact Assessment. The results of the stakeholder interview is the basis to developed the management and monitoring plan. The</p>	Complied

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		implementation of the 2019 recommended management plan was sighted and reviewed annually. The last reviewed was on 01/07/2020. Please refer to 3.4.2 for more details.	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	For local workers employment, the hiring procedure is as per the Procedure for Social Management rev 0 dated 18/01/2018. The procedure has highlighted that workers shall receive an employment contract; recruitment and promotion shall be based on merit and skills; and no discrimination using medical/pregnancy test results. Worker sample enrolled on 27/02/2020 was reviewed to verify that no discrimination in employment. However, the procedure for Foreign labour is not yet finalized and available. Genting Plantations is employing Indian workers through 2 local agents ADAMA and Chimylee. However the local agent sourcing the workers is MRS Air Travel Private Limited and Airciti Tours & Travel (India) Pvt Ltd. There is not contract established between Genting Plantations and the local sourcing agent.	Non-compliance
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Local employments' contract have been reviewed. Employment contract are retained. During the field assessment, it was observed that workers with hearing-impairment were hired for nursery operation. The employment of such worker demonstrated that there is no discrimination due health was in practiced.	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	Genting Selama Estate had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment.	Complied

		<p>At the estate, among the HIRARC carried out covered activities like chemical mixing and spraying, manuring, chemical storage, harvesting, diesel filling, FFB collection and vehicle maintenance.</p> <p>Latest overall HIRARC was reviewed and approved by the Estate Manager on 01/04/2020.</p>	
<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>Genting Selama Estate has maintained an approved Health and Safety Policy dated 21/12/2009 that is displayed prominently on notice boards in English/Bahasa Malaysia.</p> <p>Safety & Health Management Plan was available accordingly for year 2020.</p> <p>CHRA was conducted on 14/03/2017-30/04/2017 by registered assessor Reg. No. JKPP HIE 127/171-2 (154). This followed with Supplementary CHRA Report No. JKPP HQ/03/ASS/00/154-2020/023 for the assessment for intended introduce use of G-Met pesticide by G-Planter Sdn Bhd.</p> <p>Health Surveillance Program:</p> <p>Genting Selama Estate Annual Medical Surveillance has been conducted accordingly for all workers exposed to pesticide which includes woman and man. No pregnant/nursing workers were involved in pesticide handling works. Sampled the Medical Surveillance Report dated 26/10/2019 conducted for 14 workers by DOSH Reg. OHD No. HQ/12/DOC/00/262. Results indicates all 14 workers were fit to work.</p> <p>The following non-compliance was identified:</p> <p>Health and safety mitigation measures was not adequately implemented.</p> <p>Genting Selama Estate:</p>	<p>Non-compliance</p>

		<ul style="list-style-type: none"> a) A tractor (plate no. KCF 5858) was operating at the nursery with malfunction horn & rear light. b) Workshop: Machine safeguarding (engineering control) for car wash sprayer pump was not fully adequate. Only one angle of exposed rotating belt was provided secured fencing. There are rotating angles which are still exposed and at risk. 	
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>Genting Selama Estate has established an annual training program with latest training program for year 2020 that covers all aspects of the RSPO Principles and Criteria. The training need and program was made available for verification at all visited sites. Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE.</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Training records for employees available and maintained at the office. Records are verified on a sampling basis which covers all aspect of training and RSPO P&C requirement as follows:</p> <ul style="list-style-type: none"> a) Manuring Training dated 11/07/2020 b) Buffer Zone Training dated 7/07/2020 c) Harvesting Training dated 27/06/2020 d) Pesticide Container Management - Triple Rinsing and Puncturing dated 26/06/2020 e) Training on Social Management dated 19/06/2020 f) Training on Complaints & Grievances, Request & Response, Negotiations and Compensations dated 19/06/2020 	Complied

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		<p>g) Scheduled Waste Management, Domestic Waste and Recyclable Waste dated 18/06/2020</p> <p>h) Spraying and Manuring Training on January 2020</p> <p>i) Training on RSPO, MSPO & ISCC and Group Polices dated 18/06/20</p> <p>j) Fire Drill and ERT Team Training dated 05/12/2019</p> <p>k) First Aid Kit Training dated 05/10/2019</p>	
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>This is single estate certification. Hence supply chain elements are not applicable.</p>	Not Applicable
<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>	<p>This is single estate certification. Hence supply chain elements are not applicable.</p>	Not Applicable
3.8.2	<p>Mass Balance Module</p>	<p>This is single estate certification. Hence supply chain elements are not applicable.</p>	Not Applicable

	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.		
3.8.3	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.	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
3.8.5	<p>Documented procedures</p> <p>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:</p> <ul style="list-style-type: none"> 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 to demonstrate awareness of the mill's procedures for the implementation of this standard. 	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable

	d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.		
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <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>	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
3.8.7	<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>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
3.8.8	<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</p>	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable

	<p>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>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> 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 ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 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>This is single estate certification. Hence supply chain elements are not applicable.</p>	<p>Not Applicable</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>		
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.	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
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.	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
3.8.12	<p>Record keeping</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>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.</p>	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable

	<p>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.</p> <p>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>		
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>	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
3.8.15	<p>Processing</p> <p>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.</p>	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
3.8.16	<p>Registration of Transactions</p> <p>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.</p>	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable

	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.		
3.8.17	<p>Claims</p> <p>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.</p>	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
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 Plantations has not made any corporate communication.	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. <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>	Genting Plantations has not made any corporate communication.	Complied
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 Plantations has not made any corporate communication.	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 Plantations has not made any corporate communication.	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 Plantations has not made any corporate communication.	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.	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
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.	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS 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. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	This is single estate certification. Hence supply chain elements are 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	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable

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	products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.		
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.	This is single estate certification. Hence supply chain elements are not applicable.	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.	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	This is single estate certification. Hence supply chain elements are not applicable.	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.	This is single estate certification. Hence supply chain elements are not applicable.	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.	This is single estate certification. Hence supply chain elements are not applicable.	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	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable

	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 .		
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
	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 volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
Labelling and trademark (IP)			
	Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a 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 4pt (1.4 mm or 0.06 inch). In on- 	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable

	pack communications, the RSPO trademark can be printed anywhere on the pack.		
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	This is single estate certification. Hence supply chain elements are not applicable.	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.	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
	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	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable

	requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.		
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 provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable
Messaging (MB)			
	Messaging ALLOWED in storytelling in product-related communications includes:	This is single estate certification. Hence supply chain elements are not applicable.	Not Applicable

	<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>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
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 dated 22/06/2015 is established to demonstrate respect and support the Universal Declaration of Human Rights. However the policy does not include the prohibiting retaliation against Human Rights Defenders (HRD).</p>	<p>Non-compliance</p>
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Interview with workers demonstrated no harassment and abusing was observed.</p>	<p>Complied</p>
<p>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</p>			

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4.2.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>The Whistle-Blower policy dated 01/06/2020 provides a system for anonymity grievance.</p> <p>Other than the policy, the Complaints and Grievance Procedure rev 4 dated March 2020 documented the procedure to handle complaints and grievance related to estate/mill workers, external stakeholders and native customary rights.</p> <p>Document review and interview with workers and relevant stakeholders did not identify any grievances other than those request for house fixing. However please refer to 4.1.1 regarding HRD policy.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The Complaints and Grievance Procedure rev 4 dated March 2020 documented the procedure to handle complaints and grievance related to estate/mill workers, external stakeholders and native customary rights. The procedure is available in both English and Bahasa Malaysia.</p>	Complied
4.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>The grievance book was reviewed and mainly complaints are regarding house fixing. Dates of complaint and date of completing the fixing has been documented.</p>	Complied
4.2.4	<p>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.</p> <p>- Minor compliance -</p>	<p>The Complaints and Grievance Procedure rev 4 dated March 2020 documented the complainant shall be given the option of access to independent legal and technical advice, to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator in clause 2.1.10.</p>	Complied
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p>	<p>There were no community development identified. However constantly there are request from the community for assistance</p>	Complied

	- Minor compliance -	such as grass cutting and donation for festive. The certification unit has documented the request and provide where it was appropriate.	
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>Evidence of legal ownership over the estate land is available in the form of land titles. Genting Selama Estate consists of 35 land titles with total land area 1,830.14 ha. The legal use of land was confirmed without any restriction. It is now used for the cultivation of oil palm. Sampled during the audit are the following registered land titles:</p> <ul style="list-style-type: none"> • Land Grant no. 99094 No Lot 1234 (465.59 ha) owned by Genting Plantations (WM) Sdn Bhd registered on 13/05/2007. • Land Grant no. 100095 No Lot 2 (183.9072 ha) owned by Genting Plantations (WM) Sdn Bhd registered on 12/10/2005 	Complied
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>The land for carrying out oil palm plantation activities are within the area on its valid legal titles. Based on documentation review, interviews with local communities from Smallholder that there is no evidence of any legal, customary or user rights of other users on any of the estates within Genting Selama estate . Therefore, no agreement-making process and negotiated agreements detailing FPIC process is necessary.</p>	Complied
4.4.2a	<p>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.</p> <p>- Minor compliance -</p>	<p>The plantation was developed since 1980s. The land developed is government grant land. As per the SIA, there is no customary land within the plantation. Although there is no customary land, other land user such as surrounding smallholders remains to have their access. This was confirmed during stakeholders interview. Since there is no customary land, consultation is not necessary.</p>	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 -	The plantation is not within customary land. The lands of this plantation is governmental land and being granted to Genting Plantations. Furthermore, there is no new development in this certification unit Hence this requirements is not necessary.	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 -	The plantation is not within customary land. The lands of this plantation is governmental land and being granted to Genting Plantations. Furthermore, there is no new development in this certification unit Hence this requirements is not necessary.	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 -	The plantation is not within customary land. The lands of this plantation is governmental land and being granted to Genting Plantations. Hence this requirements is not necessary. However, estate mapping at appropriate scale is available to show the boundaries of the estate with surrounding smallholders.	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 -	The plantation is not within customary land. The lands of this plantation is governmental land and being granted to Genting Plantations. Furthermore, there is no new development in this certification unit Hence this requirements is not necessary.	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 -	The plantation is not within customary land. The lands of this plantation is governmental land and being granted to Genting Plantations. Furthermore, there is no new development in this certification unit Hence this requirements is not necessary.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	The plantation is not within customary land. The lands of this plantation is governmental land and being granted to Genting Plantations. Furthermore, there is no new development in this certification unit Hence this requirements is not necessary.	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	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the SIA, there is no customary land present in this certification unit. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers.</p>	Complied
4.5.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>The plantation was established since 1980s. Hence FPIC should not be applicable.</p> <p>Genting Plantations has also established the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.</p>	Complied
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>The plantation was established since 1980s. Hence FPIC should not be applicable.</p> <p>However, Genting Plantations has established the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.</p>	Complied
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>The plantation was established since 1980s. Hence FPIC should not be applicable.</p> <p>However, Genting Plantations has established the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020. The</p>	Complied

		procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.	
4.5.5	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. - Minor compliance -	The plantation was established since 1980s. Hence FPIC should not be applicable. However, Genting Plantations has established the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.	Complied
4.5.6	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. - Minor compliance -	The plantation was established since 1980s. Hence FPIC should not be applicable. However, Genting Plantations has established the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.	Complied
4.5.7	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. - Minor compliance -	The plantation was established since 1980s. Hence FPIC should not be applicable. However, Genting Plantations has established the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The	Complied

		procedures has also including the mechanism to calculate and distribute fair compensation.	
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	The plantation was established since 1980s and no new land development took place for this certification unit.	Complied
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 -	Based on the SIA, there is no customary land present in this certification unit. The estate has been developed in the 1980s and it located at a surrounding by smallholders and villagers. Through stakeholder interviews, there was no land dispute identified. However, if there is any land disputes, it will be managed following the Procedure on Conflict Resolution and Handling of Negotiations and Compensations within Genting Plantations Estates rev 3 dated 29/12/2017.	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 Procedure on Conflict Resolution and Handling of Negotiations and Compensations within Genting Plantations Estates rev 3 dated 29/12/2017 is established to manage any compensation needed.	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 -	There is no scheme small holdings involved in this certification. Furthermore the estate has been established since 1980s and the surrounding land has been well established by villagers.	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 Procedure on Conflict Resolution and Handling of Negotiations and Compensations within Genting Plantations Estates rev 3 dated 29/12/2017 is established to manage any compensation needed. There was no land dispute recorded since last assessment.	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	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the SIA, there is no customary land present in this certification unit. The estate has been developed in the 1980s. Since then there were no new development. Hence the FPIC negotiation is not applicable.</p> <p>However, the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020 is in place. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.7.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the SIA, there is no customary land present in this certification unit. The estate has been developed in the 1980s. Since then there were no new development. Hence the FPIC negotiation is not applicable.</p> <p>However, the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020 is in place. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.</p>	Complied
4.7.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Although this certification does not involved in land acquisition that may FPIC and land use right access, however, Genting Plantation had maintained all existing user rights and it is confirmed during interview with stakeholders and villagers.</p>	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	<p>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.</p> <p>- Minor compliance -</p>	<p>The estate has been developed in the 1980s and since then there were no new development. Although the this indicator may not be applicable to this certification unit, Genting Plantation has maintained the Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.</p> <p>Although this certification does not involved in land acquisition that may FPIC and land use right access, however, Genting Plantation had maintained all existing user rights and it is confirmed during interview with stakeholders and villagers.</p>	Complied
4.8.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Plantation had maintained all existing user rights and it is confirmed during interview with stakeholders and villagers.</p>	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations 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)</p> <p>- Minor compliance -</p>	<p>The estate has been developed in the 1980s and since then there were no new development.</p>	Complied

4.8.4	<p>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).</p> <p>- Minor compliance -</p>	<p>The Procedure for Compliance to Sustainability Requirements for Land Acquisition, New Planting and New Development rev 2 dated 20/01/2020 is in place. The procedure defines the Free, Prior & Informed Consent (FPIC) process and the rights of the communities to withhold consent. The procedures has also including the mechanism to calculate and distribute fair compensation.</p> <p>There was no conflict or dispute recorded since last assessment.</p>	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	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>This is a single estate certification. No purchasing of smallholders' FFB is within the scope.</p>	Not Applicable
5.1.2	<p>(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).</p> <p>- Critical (Major) compliance -</p>	<p>This is a single estate certification. No purchasing of smallholders' FFB is within the scope.</p>	Not Applicable
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>This is a single estate certification. No purchasing of smallholders' FFB is within the scope.</p>	Not Applicable
5.1.4	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>This is a single estate certification. No purchasing of smallholders' FFB is within the scope.</p>	Not Applicable

5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	This is a single estate certification. No purchasing of smallholders' FFB is within the scope. However, other businesses has been entered fairly, legally and the payment on the agreed timeframe was paid.	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 -	This is a single estate certification. No purchasing of smallholders' FFB is within the scope.	Not Applicable
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 -	This is a single estate certification. No purchasing of smallholders' FFB is within the scope.	Not Applicable
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 -	The certification unit does not directly supports independent smallholders with certification. Furthermore this certification unit is a single estate certification that does not involved in purchasing smallholders FFBS.	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 -	There is no smallholders involved in this certification. However if there is complaint it will be managed following the Complaints and Grievance Procedure rev 4 dated March 2020.	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 -	The certification is a single estate certification. It does not involved purchasing of smallholders FFBS. Hence this requirement is not applicable.	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 -	The certification is a single estate certification. It does not involved purchasing of smallholders FFBS. Hence this requirement is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	The certification is a single estate certification. It does not involved purchasing of smallholders FFBS. Hence this requirement is not applicable.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	The certification is a single estate certification. It does not involved purchasing of smallholders FFBS. Hence this requirement is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	The certification is a single estate certification. It does not involved purchasing of smallholders FFBS. Hence this requirement is not applicable.	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 -	The People Policy dated 03/08/2009 documented Genting Plantation's commitment towards non-discrimination and equal opportunity. During workers' interview, it was found that Genting had hired workers with impairment and all religion are hired. There were no discrimination found.	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.	Interview with foreign workers confirmed that Genting Plantations pay for fees including air tickets, levies and medical fees. There is not charge to the workers.	Complied

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	- Critical (Major) compliance -	Interview with female workers confirms that there were no discrimination against them. Equal opportunity and overtime has been offered to the workers.	
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 hiring of workers are based on fitness of the task. There are no discrimination recorded. The clerk hiring process was sampled and the decision to hire was based on skills and qualifications. The medical fitness test was not the deciding factor of hiring.	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 -	As per the Procedure for Social Management rev 0 dated 18/01/2018. The procedure has highlighted that workers shall receive an employment contract; recruitment and promotion shall be based on merit and skills; and no discrimination using medical/pregnancy test results. Worker sample enrolled on 27/02/2020 was reviewed to verify that no discrimination in employment.	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 -	Gender committee is setup and lead by Mdm Poongulai. The last gender committee meeting was held on 07/07/2020. In the meeting, the policy regarding new mother was discussed. Interview with female workers confirmed they are aware about this committee and the function of this committee.	Complied
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Pay slips of sampled female workers and foreigners verified that pays are equal for the same scope of work. Overtime offered to these groups of workers was not discriminated.	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.	Samples of 18 workers from all operations type was reviewed. The work contract has referenced to the applicable Malaysian Law. Pay and conditions are stated in the contract and the MAPA/NUPW	Complied

	- Critical (Major) compliance -	agreement was referenced. The contract are available in the language understood by the workers.	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, 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>The contracts reviewed have include terms such as termination of contract, renewal of contracts, work hours, overtime, leave, sick leave, maternity leave entitlement.</p> <p>Interview with workers especially foreign workers confirmed that they have sign the work agreement at the home country prior departure to Malaysia.</p>	Complied
6.2.3	<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>Payslips of 18 workers for April 2020, Dec 2019 and July 2019 where verified to confirm that works hours are deducted correctly and over time are paid correctly.</p>	Complied
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>Housing facilities provided by the CH is deemed sufficient. Cleanliness of the facilities are maintained.</p> <p>Each house are provided with electricity and clean water.</p> <p>Interview with workers confirms that each house are usually for 2-4 people and it is not over crowded.</p> <p>Housing inspections are conducted by periodically and any damages are requested through the grievance mechanism and attended by the CH.</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>The CH has allocated land at the housing area for workers to do some vegetable farming. Additional to these, the estate is located at urban. Hence affordable food is easily accessible.</p>	Complied

<p>6.2.6</p>	<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>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>The decent living wage benchmark is not available. Until the benchmark is available for Malaysia a Prevailing wage is required to be demonstrated by the certification unit. The Prevailing wage has been determined to be RM1,844.70 for harvester and RM1,249.32 for general workers with in kind benefit of RM149.32.</p>	<p>Complied</p>
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	<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 • 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 workers hired for core and temporary work. All estate operations' workers are fulltime employee that have contract with Genting Plantations. Working permits were verified</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 People Policy dated 03/09/2009 stated that "no one shall be denied of their rights, freedom of association and equal opportunities". The policy is available in both English and Bahasa Malaysia.</p> <p>The list of Trade Union workers was observed. Interview with Kedah State NUPW Secretariat confirmed that there is no such restriction observed in Selama Estate.</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>There is no meeting held with NUPW. However the workers' committee meetings are being held on quarterly. The last meeting was held on 08/10/2019. There was no meeting after October 2019</p>	Complied

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	- Minor compliance -	due to Covid-19 Pandemic. All mining meetings are retained by the estate management.	
6.3.3	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. - Minor compliance -	Workers representatives are elected by workers usually during morning muster. There is no management interference in this process.	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	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. - Minor compliance -	The People Policy dated 03/08/2009 stated that Genting Plantations will not employ nor exploit under aged children to work in their operating unit. The terms of contract with contractors has stated similar that no under age children shall be employed by the contractors for any activities at the certification unit.	Complied
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -	The age screening mechanism has been built in to the Litramax system. The system does not allow to register any workers that is below 18 years old. The workers list was further verified to confirm there is not workers below the age of 18.	Complied
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	There is no young worker employed at Genting Selama Estate. Details of compliance been identified as per Sustainability Management Procedure Manual – Legal Requirement Register Part 3: Social, Doc. No. SMP-GPB-22 under part 11. Children and Young Persons (Employment) Act 1966, Children & Young Persons (Employment) (Amendment) 2018. Verified during the field visit, no young persons were employed.	Complied

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 People Policy dated 03/08/2009 stated that Genting Plantations will not employ nor exploit under aged children to work in their operating unit.</p> <p>The terms of contract with contractors has stated similar that no under age children shall be employed by the contractors for any activities at the certification unit.</p> <p>The policy is explained to the workers usually during the morning briefing. The policy is also published at locations such as housing area and master ground to make it easy for workers' access.</p> <p>Interview with contractors confirm they understood the no child labour policy implemented by Genting Plantations.</p>	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
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>The Sexual Harassment Policy dated 03/08/2009 is established. The policy is communicated through morning briefing and publicizing the policy on notice boards.</p> <p>Interviewed with workers confirms they are aware about no sexual harassment.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The Social Policy dated 22/06/2015 is established. The policy has been briefed to all the workers during induction training and morning briefing. Workers records shown that there are cases of pregnancy and workers still maintained their work but in a location that that is suitable.</p>	Complied
6.5.3	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no new mother identified since last assessment. Hence no consultation was required. However, the mechanism for the consultation can be improved.</p>	OFI

6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The Procedure on Prevention and Eradication of Sexual Harassment at the Workplace rev 2 dated 11/10/2013 was established to describe what is sexual harassment and how to launch a grievance/complaint if such event took place.</p>	Complied
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <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 • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>During the field assessment, the assessment team was informed regarding overtime disputes. Verification of the checkroll book shows that the worker has only 8 hours of Overtime. Further verification with the management indicated that the overtime usually require Estate manager approval but the current practice is offered and accepted base on verbal. Implementation on overtime management could be improved to ensure proper hours is approved by estate manager and proper acceptance of workers.</p>	OFI
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>Genting Plantations has developed Procedures for Social Management, Doc. No. SMP-GPB-32, Rev. 0, dated 18/01/2018. The procedure has outlined the practices of the company such as no contract of substitution for the foreign workers, provide reasonable and safe living condition to all the employees, post arrival orientation will be provided to brief on terms and conditions, safety & health, national and state laws and regulations and no discrimination to all the workers.</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>			

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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>The OSH policy is well briefed to all workers. Interview with workers reveal that they understand the policy and the importance of safety at work at Genting Selama Estate.</p> <p>Genting Selama Estate:</p> <p>OSH meeting conducted on quarterly basis. For year 2020/2019 sampled the meeting minutes dated 26/09/2019, 12/12/2019, 12/03/2020 & 07/07/2020. The OSH discussion agenda was adequately addressed.</p> <p>OSH Committee Chart for year 2020 was available accordingly with adequate representatives from employee and employer. Appointed letter for OSH Committee members available with latest issuance for year 2020/2021. Verified also that appointment letters for Chairman, Employees Representative and Employer Representative has been issued accordingly with the respective roles & responsibilities clearly stated in the appointment letters.</p>	Complied
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 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>Accident and emergency procedures have been communicated to employees, contractors and visitors.</p> <p>Fire Evacuation drill was conducted annually. The latest Fire evacuation drill at Genting Selama Estate was conducted on 05/12/2019 to test the state of readiness during emergency situation.</p> <p>Accident and emergency procedures are in English/Bahasa Malaysia and this is understood by the responsible workers, staff or executives involved in the operation. Good understanding level observed among the workers.</p> <p>Training for First Aid is conducted on annual basis. Adequate first aiders trained available. Latest First Aid Training done dated 05/10/2019.</p>	OFI

		<p>First aid equipment is available at worksites. During the site visit there is evident that First Aid Box is available at the relevant area.</p> <p>Fire extinguisher (ABC Powder) assessed during the site observation are available and within the expiry date.</p> <p>Portable emergency eye wash & shower facility available at chemical store, workshop and mixing area</p> <p>Verified that there were no incidents with JKPP 6 submission (MC>4 days) for year 2020. Verified also there was no Lost Time Incidents (LTI) as to date for year 2020. DOSH visit been recorded in the DOSH log book. Seen the latest DOSH visit recorded dated 2/05/2019 and comments highlighted by DOSH was actioned and replied to DOSH officer via letter dated 17/05/2019.</p> <p>The following OFI has been raised: First Aid Kit location at the Workshop could be further improved.</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>1) PPE issuance record sampled for sprayers: -</p> <ul style="list-style-type: none"> a) Apron dated 16/06/2020 b) Nitrile Glove dated 15/07/2020 c) Rubber Boot dated 12/5/2020 d) Respirator mask dated 16/06/2020 e) Goggle dated 03/04/2020 <p>2) PPE issuance record sampled for harvester: -</p> <ul style="list-style-type: none"> a) Rubber Boot dated 24/06/2020 b) Goggle dated 13/07/2020 c) Sickle Cover dated 13/07/2020 d) Safety Helmet dated 13/07/2020 	Complied

		3) PPE Issuance record sampled for welder: a) Safety Helmet dated 11/7/20 b) Cotton Glove dated 28/01/20 c) Goggle dated 29/01/20	
6.7.4	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. - Minor compliance -	Medical care and accident insurance is provided to all the employees. Workers are covered under SOCSO scheme. Seen the SOCSO scheme payment schedule at GSLE for April 2020, May 2020 & June 2020. Above Sosco submission were done using the Form 8A. Details of the Employer and worker’s details been available accordingly.	Complied
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Records on Lost Time Accident (LTA) metrics at Genting Selama Estate had been verified. JKPP 8 been submitted to DOSH annually with latest done Ref No. JKPP 8/55319/2020 submitted for year ending 2019 to DOSH on 29/01/2020.	Complied
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	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	The IPM Plan dated 10/07/2020 is available. The plan include identification on potential pest in estate and action to be taken. Sample on implementation of Barn Owl Box (BOB) to increase ration from 1:25 into 1:23. From the monitoring of occupancy of BOB dated 19/04/2020 was 76%. The training conducted to person in charge on 14/01/2020.	Complied
7.1.2	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. - Minor compliance -	No record of species of Global invasive database ad CABI.Org in Genting Selama estate.	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>No fire sanitation was observed. The practice is according to the Zero Burning Policy; Rev 01; 10/08/2011. As per the policy there shall be no open burning of any kind at operating units, except where deemed necessary with the prior approval of the relevant authorities.</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>Justification of pesticides applied is available in the Sustainability Management Procedure, SMP-GPB-28 dated 21/07/2015. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non- target species.</p>	Complied
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 LD50, area treated, amount of active ingredients applied per ha and number of applications) were made available. Ai/Ha as follows: Ai/Ha – 2018 (1.34), 2019 (0.708), 2020 (0.38)</p>	Complied
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 GENP Sustainability Management Procedure Manual, SMP-GPB-28 Rev04, dated 03/07/2018. The implementation in the field is consistent with the manual.</p> <p>Management views the use of agrochemicals in its daily operation as essential but not at the expense of its existing IPM programme. All pesticides application is carried out as per the Oil Palm Manual and SOP.</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>The quantity of agrochemicals required for various field conditions are documented and justified in GENP Sustainability Management Procedure Manual, SMP-GPB-28 Rev04, dated 03/07/2018. The implementation in the field is consistent with the manual. Genting</p>	Complied

		Management views the use of agrochemicals in its daily operation as essential but not at the expense of its existing IPM programme. All pesticides application is carried out as per the Oil Palm Manual and SOP. There is no prophylactic use of pesticides.	
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>	Sighting of the Chemical Register dated 12/02/2020 showed that class II, III & IV chemicals were used at the estate visited. During the site visit to the chemical store it was justified that there were class II, III and IV chemicals being used. Class II chemicals were Ken-Amine 600 & CYPERACT16.0EC. No class I chemicals used. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead.	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>Pesticides operators have been given training on the safety handling and application of pesticides. The training have been provided by Asst. Manager, Medical Assistant and suppliers of Spraying Equipment/ Pesticides who are knowledgeable on pesticides handling and application. Sighted the training records as follows:</p> <ul style="list-style-type: none"> a) Manuring Training dated 11/07/2020 b) Buffer Zone Training dated 07/07/2020 c) Pesticide Container Management - Triple Rinsing and Puncturing dated 26/06/2020 	Complied

		<p>d) Scheduled Waste Management, Domestic Waste and Recyclable Waste dated 18/06/2020</p> <p>e) Spraying and Manuring Training on January 2020</p>	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Sighted the unused empty chemical containers that were triple rinsed, pierced 3 holes at the bottom and kept at Scheduled Waste Store. They are disposed via G-Planter Sdn Bhd. as non-scheduled waste. The approval of G-Planter to collect the containers was verified and found in order. Latest record verified during site visit, dated 17/06/2020 by G-planter Lorry (JNR 1008). Latest record for empty container that been store was 90 pieces as per record and site verification.</p>	Complied
7.2.9	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>No Aerial spraying in Genting Selama Estate verified as per record and interview.</p>	Complied

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7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Selama Estate Annual Medical Surveillance has been conducted accordingly for all workers exposed to pesticide which includes woman and man. No pregnant/nursing workers were involved in pesticide handling works. Sampled the Medical Surveillance Report dated 26/10/2019 conducted for 14 workers by DOSH Reg. OHD No. HQ/12/DOC/00/262. Results indicates all 14 workers were fit to work.</p>	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>No person under the age of 18, pregnant/nursing workers were involved in pesticide handling works. This was verified during the field visit.</p>	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>The most recent Waste management plan is dated 18/03/2020.</p> <p>The training on waste management conducted on 18/06/2020. The training have included handling of general waste, scheduled waste and recycle waste.</p>	Complied
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Based on interview and site verification, it was noted that the proper wastes disposal are understood by the workers and according to the Sustainability Management Procedure Manual, SMP-GPB-12, rev. 1, dated 01/12/2014.</p> <p>Sampling on Scheduled waste in Selama Estate: - Inventory: K95/130/100/042 dated May 2020.</p> <p>Consignment note (0144839) dated 24/06/2020 for SW 102 and previously disposal was on November 2019.</p> <p>Last disposal of empty container at G-Planter on 17/06/2020 with total 587 container.</p>	Non-compliance

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		<ul style="list-style-type: none"> Sighted CU kept scheduled waste (SW 404) more than 180 days as per disposal record (SW 404) was on 21/04/2020 and previously disposal was on 13/07/2019. Found paint container and lubricant container was found in landfill in Field (OP98) during site verification. <p>This action was not followed according to Scheduled waste management procedure (SMP-GPB-11);Rev 01; dated 11/06/2018 Thus Minor NC been raised</p>	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	No Sighted of unit using fire as waste disposal.	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 -	<p>The good agriculture practices for estates and mills are guided by the following manuals:</p> <ul style="list-style-type: none"> a) Genting Plantations Oil Palm Manual OPM issued on 09/11/1999 b) Sustainability Management Procedure Manual 81/88/2013 revised in 07/02/2019. c) OSH Manual dated 01/01/2010. d) Environmental Control Procedure – 01/09/2018 e) Store Operating Manual – 2014 f) Standard Operating Procedure West Malaysia Estates 170/1/2011. g) Jobs description – 2012 <p>The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections:-</p> <ul style="list-style-type: none"> a) OPM No 7. Manuring of oil palm 	Complied

		b) OPM no 13. Managing difficult soils							
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 -	The Soil sampling was conducted on 30/04/2020 by Genting Plantations Research Berhad. Soil series in estate includes Telemong-Akob-Local Alluvium and Serdang-Bungor-Munchong. The estate follow the recommendation of the Group Agronomist to maintained the crop health. The Agronomist conducts a yearly visit to monitor the crop conditions. The last visit was conducted on April 2019. Due to the current Pandemic, the year 2020 visit was delayed to August 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 -	Based on site visit at all of the sampled estates, EFB application were seen especially on the immature palms. EFB application recorded:- <table border="1" data-bbox="1137 799 1926 951"> <thead> <tr> <th>Year</th> <th>EFB record/ Target</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>3905 mt</td> </tr> <tr> <td>2020</td> <td>8850 mt</td> </tr> </tbody> </table>	Year	EFB record/ Target	2019	3905 mt	2020	8850 mt	Complied
Year	EFB record/ Target								
2019	3905 mt								
2020	8850 mt								
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	The application records were maintained. Sampling on application on AC was on 09/03/2020 in OP93A (38.13ha) with dosage 1.53kg/Ha. All records are recorded in the Costing book and the application is according to the agronomist recommendation.	Complied						
Criterion 7.5: Practices minimise and control erosion and degradation of soils.									
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	The steep slope map record for Main Division was sighted and details as below:- Data source: SRTM90 Relative vertical accuracy : 1cm :200 Meter GIS processed: 18/06/2013	Complied						

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		Slope classes (degree)	Area (ha)		
		0 – 6	642.73		
		6 -10	15.35		
		10 -15	0.06		
		15 – 20	0		
		20 – 25	0		
		More than 25	0		
		As per soil analysis test report no SR08/2014 dated 13/02/2014, there is no peat area in Genting Selama estate. As per soil analysis the Organic matter around 0.67 – 2.68 %.			
7.5.2	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. - Minor compliance -	Oil palm Manual under Topic Soil conservation and Terracing dated June 2013. All the three estates had also implemented prevention of soil erosion measures such as construction of moisture conservation pits (MCP) in steep slope areas. In SMP –GPB-10; Rev 01; March 2020 stated no replanting in 25° area and management was aware regarding this matter.		Complied	
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	The estate had implemented prevention of soil erosion measures such as construction of moisture conservation pits (MCP) in steep slope areas according to Oil palm Manual - Soil Conservation and Terracing dated June 2013. In SMP –GPB-10; Rev 01; March 2020 stated no replanting in 25° area and management was aware regarding this matter.		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	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting was observed. Soil survey was conducted to identifying marginal and fragile soil in estate. From the record no fragile soil in all estate bee visit, example soil sampling as per below detail:-</p> <table border="1" data-bbox="1137 507 1917 740"> <thead> <tr> <th>Soil Type</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Telemong-Akob-Local Alluvium</td> <td>94%</td> </tr> <tr> <td>Serdang-Bungor-Muchong</td> <td>6%</td> </tr> <tr> <td>Total</td> <td>100%</td> </tr> </tbody> </table>	Soil Type	Percentage	Telemong-Akob-Local Alluvium	94%	Serdang-Bungor-Muchong	6%	Total	100%	Complied
Soil Type	Percentage										
Telemong-Akob-Local Alluvium	94%										
Serdang-Bungor-Muchong	6%										
Total	100%										
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>There is no extensive planting on marginal and fragile soil. However standard operating procedure Oil Palm Manual (OPM 13: Managing Difficult Soils) was established. This SOP including peat soils, acid sulphate soils, Saline soils, Shallow lateritic soils, podzol or similar soils and Sandy soil management.</p>	Complied								
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>The estate had implemented prevention of soil erosion measures such as construction of moisture conservation pits (MCP) in steep slope areas. Cover crops were observed to be in place as the CU management had encouraged the establishment of soft growth. Visits to the field found that significant areas of the ground were covered with <i>Neprolepis biserrata</i>. Most slopes had well established <i>Mucuna bracteata</i>.</p> <table border="1" data-bbox="1137 1182 1917 1378"> <thead> <tr> <th>Slope classes (degree)</th> <th>Area (ha)</th> </tr> </thead> <tbody> <tr> <td>0 – 6</td> <td>642.73</td> </tr> <tr> <td>6 -10</td> <td>15.35</td> </tr> <tr> <td>10 -15</td> <td>0.06</td> </tr> </tbody> </table>	Slope classes (degree)	Area (ha)	0 – 6	642.73	6 -10	15.35	10 -15	0.06	Complied
Slope classes (degree)	Area (ha)										
0 – 6	642.73										
6 -10	15.35										
10 -15	0.06										

		15 – 20	0	
		20 – 25	0	
		More than 25	0	
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 in Genting Selama estate. Peat management 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. PROCEDURAL NOTE: 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). - Minor compliance -	No Peat Soil in Genting Selama estate. Peat management is not applicable.		Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	No Peat Soil in Genting Selama estate. Peat management is not applicable.		Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	No Peat Soil in Genting Selama estate. Peat management is not applicable.		Not Applicable
7.7.5	(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	No Peat Soil in Genting Selama estate. Peat management is not applicable.		Not Applicable

	<p>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>		
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> <p>- Critical (Major) compliance -</p>	No Peat Soil in Genting Selama estate. Peat management is not applicable.	Not Applicable
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 in Genting Selama estate. Peat management is not applicable.	Not Applicable
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
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>The water management plan dated 08/07/2020 has established the plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan include:</p> <p>i) Two water source been declared from water government (SADA) and (LAP).</p> <p>ii) The monitoring of outgoing water been twice a year, latest record was on 16/03/2020. From the monitoring Selama estate</p>	Complied

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	- Minor compliance -	<p>have 8 inlet and 6 outlet. The result showed inclined with INWQS(National Water Quality Standards. Previous record was on Sept 2019.</p> <p>iii) To optimize the water and nutrient usage to reduce wastage, management to monitoring the pipe leakage in residential area, ensure no leakage of spraying pumps and educate the workers regarding to promotes water conservation.</p> <p>iv) For protection of water courses, site visit at area OP16 sighted no chemical activity trace in buffer zone area.</p> <p>v) No trace of natural vegetation in riparian areas has been removed. All in good condition.</p> <p>vi) No bore well is being use for water supply, GBSE using SADA (Syarikat Air Darul Aman) and LAP (Lembaga Air Perak) as water supply.</p>	
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>	<p>Management of riparian zone is guided by the Riparian Buffer Zone Management, doc. No. SMP-GPB-14, rev. 1, dated 14/08/2014. The width of riparian zone has been defined in the procedure. The allocated zones shall be demarcated and left to the nature. Application of agrochemicals such as fertilisers and herbicides is prohibited. Interview with workers had confirmed their understanding of prohibition of chemical applications in riparian zone.</p>	Complied
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>This is a single estate certification. Indicator not applicable.</p>	Not Applicable
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>This is a single estate certification. Indicator not applicable.</p>	Not Applicable

Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised									
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>Selama estates continuously monitor the fossil fuel consumption and kept records. Among the management plans to improve efficiency generally were:</p> <ul style="list-style-type: none"> - Carry out preventive maintenance of machinery in order to prevent high breakdown hours and making the machines more efficient - Continuous education to operators who handle the machinery so that the unnecessary running hours can be minimised <p>The Diesel usage record was available for review:-</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Year</th> <th>Liter</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>48,187</td> </tr> <tr> <td>2020</td> <td>21,190</td> </tr> </tbody> </table>	Year	Liter	2019	48,187	2020	21,190	Complied
Year	Liter								
2019	48,187								
2020	21,190								
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.									
7.10.1	<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 includes diesel consumption and fertiliser consumption. 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 - To apply more organic fertiliser to reduce dependency of inorganic fertiliser. 	Complied						

		The GHG emission are identified and assess for the GSLE. The data was accurate as per verification on diesel data and fertiliser used.	
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>	Not applicable since there is no new development in this certification unit.	Complied
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>No Other significant pollutants are identified in Selama estate. 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 - To apply more organic fertiliser to reduce dependency of inorganic fertiliser. 	Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	As per Zero Burning Policy dated 10 August 2011, there shall be no open burning of any kind at operating unit except where deemed necessary with prior approval of the relevant parties or authorities.	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>	The management already establish regarding to fire prevention standard operating procedure and control the measure such as warning signs at land clearing area and scheduled for patrolling of replanting area, estate boundary area during prolong dry season and also install stop off to retain water at 50 cm to 60 cm in the field for keep the soil moisture and prevent fire outbreak occurred.	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	Due to fire prevention and control measure, during stakeholder meeting management inform the stakeholder regarding to zero	Complied

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		burning policy. This meeting involve the interested parties such as smallholder, authorities, contractor, and others.	
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.			
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>	There is no land clearing after November 2005. As per RSPO RaCP, there is no outstanding liabilities of this certification unit.	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>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>The HCV assessment contained information of both planted area and relevant wider landscape-level, and result of HCV was obtained. There was 1 report prepared by the HCV assessors (conducted in Feb-Mar 2010) covering the estates audited. The report of assessment contained in "High Conservation Value (HCV) Final Report (Northern Region).The following aspects were assessed:</p> <ul style="list-style-type: none"> - Area of HCV-Shared management of forest reserve and boundary areas/buffer zones - The presence of large mammals and birds and how they are protected from poaches. - IPM: use of plants to attract parasitoids to control bagworms & barn owls for rats management and success <p>Drainage and the conditions. Determining the presence of fishes as a bio-indicator of water health</p>	Complied
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).</p> <p>- Critical (Major) compliance -</p>	<p>The Inventory of HCV Sites within Genting Plantations Berhad Group of Estates (Northern Region) was conducted on 27/3/2010 by Dr Yap Son Kheong.</p> <p>Identification of HCV in Selama estate include 3 HCV; HCV 4.1 (Water Shed Protection) at OP 2019D, HCV 4.2 (erosion control) in field OP 94,OP95 and OP08 and HCV 6 (Temple and Cemetery area) with total 9.97 ha.</p>	Complied
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 estate was developed since 1980s. And since 15/11/2018, there is no new development.</p>	Complied
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>The assessment contained information of both planted area and relevant wider landscape-level, and result of HCV was obtained. Continuous HCV and Biodiversity training was conducted on 12/01/2020.</p> <p>Daily morning briefing includes reminder to workers regarding the HCV and species protection.</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 latest HCV monitoring program is dated Jan 2020. This management plan will be reviewed annually by management. The last review was conducting in December 2019. Monitoring is</p>	Complied

		conducted once every 4 month and the latest monitoring was conducted on 10/04/2020	
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>	The estate was developed since 1980s. And since 15/11/2018, there is no new development.	Complied

Appendix B: Approved Time Bound Plan

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of January 2020	Remarks
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		
6		Genting Sepang Estate		Feb, 2020		
7		Genting Cheng Estate				
8	Genting Plantations (WM) Sdn Bhd (100%) for estates	Genting Selama Estate, Kedah, Malaysia	Single estate certification	July, 2019	Certified	None
9	Genting SDC Sdn Bhd (100%)	Genting Sabapalm Estate, Sabah, Malaysia	Supply base for Genting Sabapalm Oil Mill, Sabah, Malaysia	Aug, 2015	Certified	None
10	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
11		Genting Tenegang Estate, Sabah, Malaysia				
12		Genting Layang Estate, Sabah, Malaysia				
13		Genting Bahagia Estate,				

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	Status as of January 2020	Remarks	
14	Landworthy Sdn Bhd (84%)	Genting Landworthy Estate, Sabah, Malaysia				
15	Genting Tanjung Bahagia Sdn Bhd (100%) for estates	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah Oil Mill, Sabah, Malaysia	July, 2021	Not certified	Concept Note for RACP to be re-submitted to RSPO.
16		Genting Permai Estate, Sabah, Malaysia				
17		Genting Kencana Estate, Sabah, Malaysia				
18	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
19	Genting Plantations Bhd Wawasan Land Progress Sdn Bhd (100%)	Genting Sekong Estate, Sabah, Malaysia	Supply base for Genting Trushidup Oil Mill, Sabah, Malaysia	Sept, 2017	Certified	None
20	Asiaticom Sdn Bhd (100%) Sawit Sukau Usahasama Sdn Bhd (56%)	Genting Suan Lamba Estate, Sabah, Malaysia				
21	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 PT SMA (1k) – NPP submitted for 30 days public notification (30 April 2020)
		SISM Plasma				
22	PT Sawit Mitra Abadi (70%)	Abadi 1 & 2 Abadi 3 & 4				
		SMA Plasma				

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	Status as of January 2020	Remarks	
23	Genting Plantations Berhad (100%)	Genting Mewah Estate, Sabah, Malaysia Supply base for Genting Mewah Oil Mill, Sabah, Malaysia	Mar, 2017	Certified	None	
24	Genting Plantations (WM) Sdn Bhd (100%)	Genting Bukit Sembilan Estate, Kedah, Malaysia Single estate certification	July, 2017	Certified	None	
25	Knowledge One Investment Pte Ltd (85%) – PT Kharisma Inti Usaha (KIU)	KIU 1 KIU 2 KIU 3 KIU 4	Supply base for KIU Oil Mill July, 2021 July, 2022 (Plasma)	Not certified	NPP in progress. HCV report being reviewed by HCVRN. HCSA report to be reviewed by HCSA	
		KIU Plasma				
26	PT Agro Abadi Cemerlang (70%)	AAC 1 & 2 AAC 3 & 4	Supply base for AAC Oil Mill (mill planned for construction)	Oct, 2021	Not certified	
		AAC Plasma				
27	PT Surya Agro Palma (70%)	SAP Estate 1 SAP Estate 2,3 & 4 SAP Estate 5 & 6			HCSA report under review by HCSA. NPP completed	
		SAP Plasma				
27					In process of obtaining HGU. HCSA report in progress.	
28	PT Globalindo Agung Lestari (60%)	Lamunti Barat Estate Lamunti Timur Estate I & II Mengkatip Estate I & II Bakuta Estate Plasma Timur & Barat	Supply base for Globalindo Oil Mill, Kalimantan, Indonesia	Oct, 2023	Not certified	In process of obtaining HGU HCSA report in progress.
29	PT United Agro Indonesia (60%)	PT UAI 1 & 2	Supply base for UAI Oil Mill, Kalimantan, Indonesia	Oct, 2023	Not certified	In process of obtaining HGU NPP for PT UAI in progress.

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No	Subsidiaries & Ownership (%)	Name of the Estate and Mills	TBP for certification	Status as of January 2020	Remarks	
		UAI Plasma			HCSA report in progress.	
30	PT Susantri Permai (95%)	Puroh Estate Masaha Estate Zircon Hill Estate	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia	Oct, 2022	Not certified	In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		SP Plasma		Oct, 2023		
31	PT Dwie Warna Karya (95%)	Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate	Supply bases for Golden Hill Oil Mill, Kalimantan Indonesia	Oct, 2022	Not certified	In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		DWK Plasma		Oct, 2023 (plasma)		
32	PT Kapuas Maju Jaya (95%)	Waterfall Estate I & II Muhun Estate I & II Talawang Estate I & II	Supply bases for KMJ Oil Mill, Kalimantan Indonesia	Oct, 2022	Not certified	In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		KMJ Plasma		Oct, 2023 (plasma)		
33	PT Citra Sawit Cemerlang (70%)	Cemerlang Estates	Supply base for CSC Oil Mill (mill planned for construction)	Oct, 2021	Not certified	In process of obtaining HGU. HCSA report under review by HCSA.
		CSC Plasma				
34	PT Palma Agro Lestari Jaya (70%)	PALJ Estates	Supply base for PALJ Oil Mill (mill planned for construction)	Aug, 2023	Not certified	In process of obtaining HGU. HCSA report under review by HCSA. NPP completed.
		PALJ Plasma				

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2019 for Genting Selama Estate 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 datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted 2019 for Genting Selama Estate are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0
PKO	0

Extraction	%
OER	0
KER	0

Production	t/yr
FFB Process	0
CPO Produced	0
PKO Produced	0

Land Use	Ha
OP Planted Area	1,774.32
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	14.73
Total	1,789.05

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	16,266	0.54	0	0	0	0	16,266	0.54
CO ₂ Emission from fertilizer	-12,781	-0.42	0	0	0	0	-12,781	-0.42
NO ₂ Emission	1,687.09	0.06	0	0	0	0	1,687.09	0.06
Fuel Consumption	0	0	0	0	0	0	0	0
Peat Oxidation	1,243.03	0.04	0	0	0	0	1,243.03	0.04
Sink								
Crop Sequestration	0	0	0	0	0	0	0	0
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	6,602.76	0.23	0	0	0	0	6,602.76	0.23

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0.00	0.00
Fuel Consumption	0.00	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	0.00	0.00

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

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

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0
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	Oct 2019	2,304.23		2,304.23
2	Nov 2019	2,233.94		2,233.94
3	Dec 2019	2,372.25		2,372.25
4	Jan 2020	2,202.23		2,202.23
5	Feb 2020	3,075.53		3,075.53
6	Mac 2020	2,832.88		2,832.88
7	Apr 2020	3,066.63		3,066.63
8	May 2020	2,863.95		2,863.95
9	Jun 2020	3,006.31		3,006.31
	TOTAL	23,957.95		23,957.95

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
	N/A		

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)
	N/A			

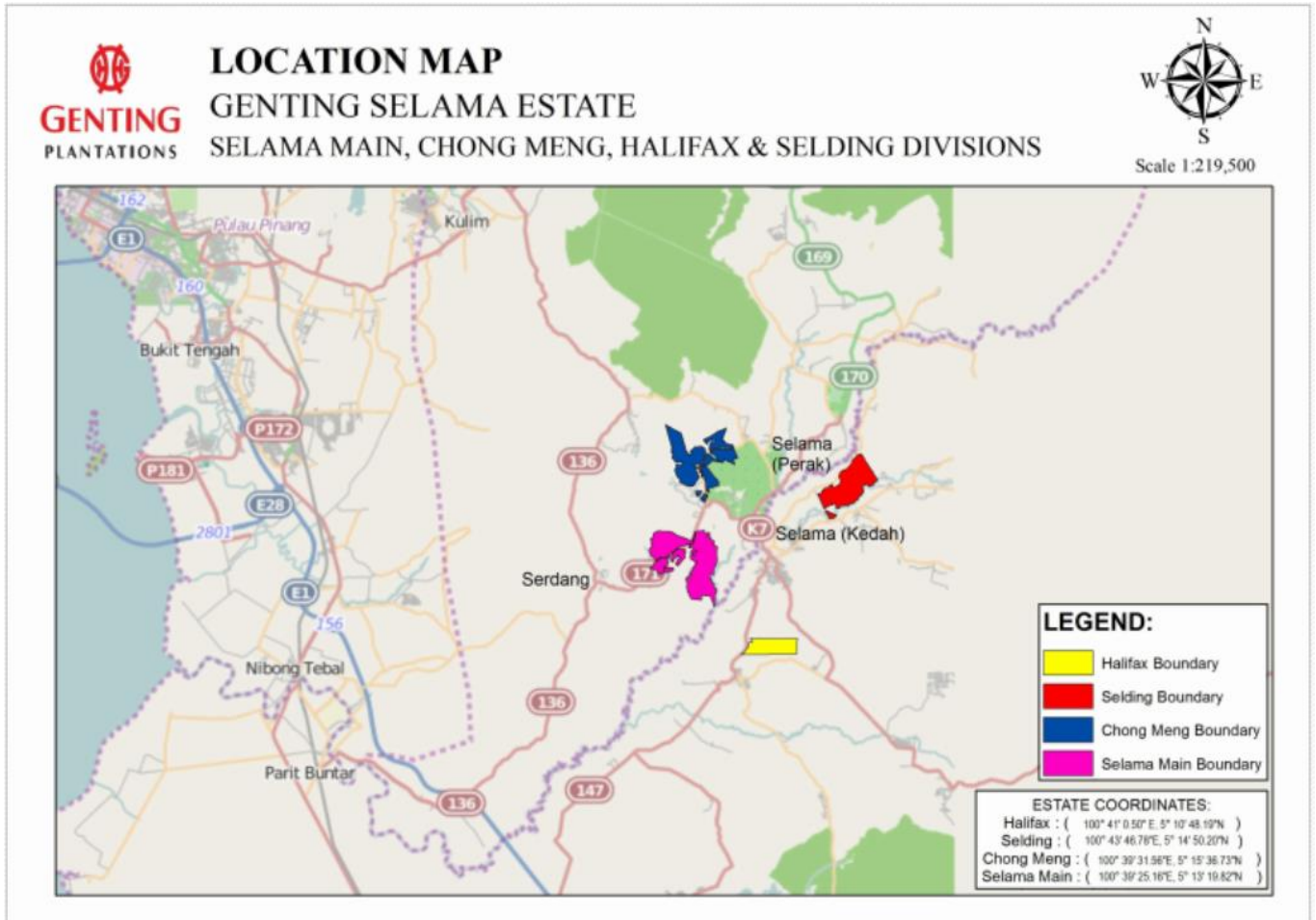
D. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	N/A			

E. Records of CPO & PK Sold as conventional since the last audit (if any)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
	N/A			

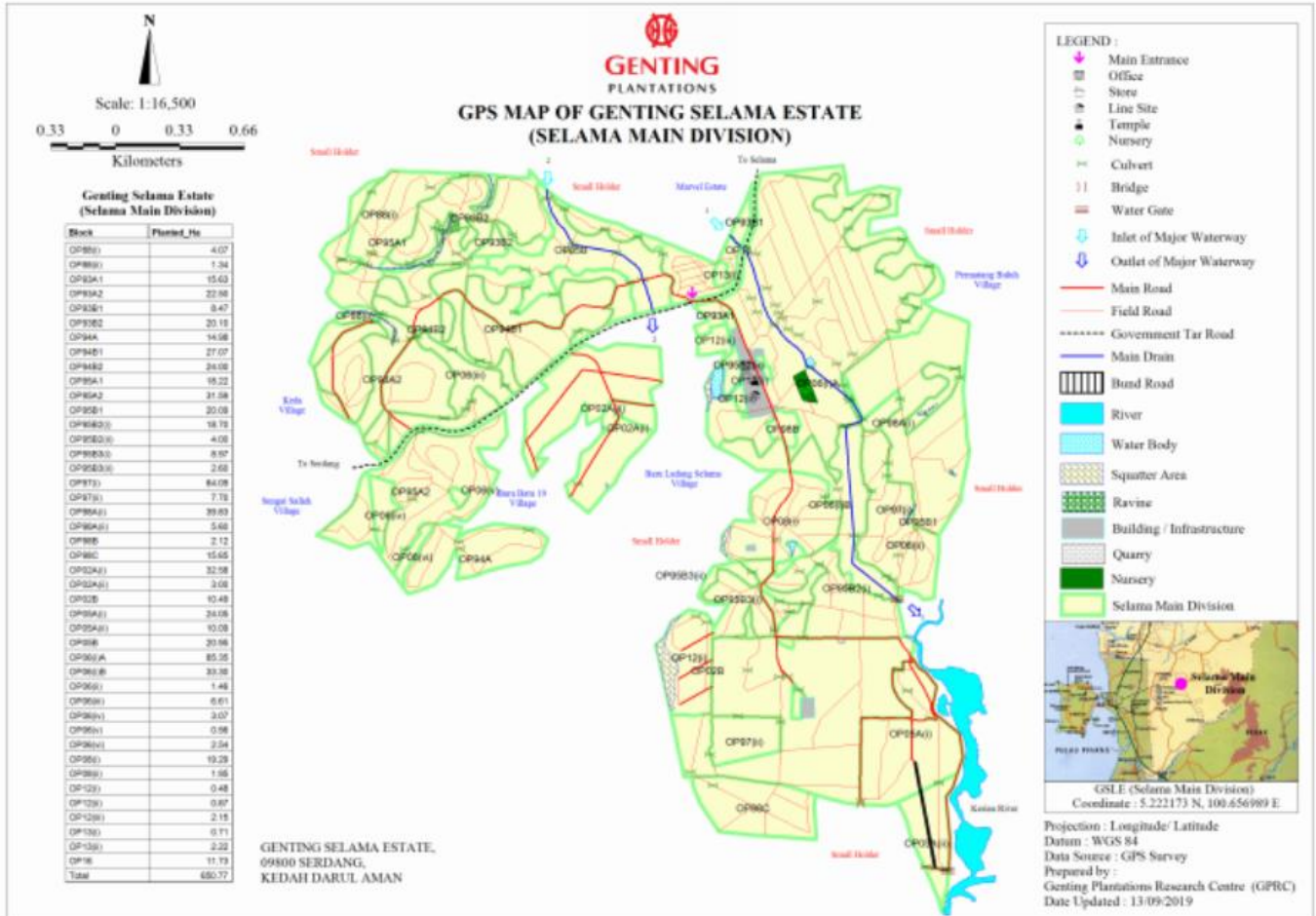
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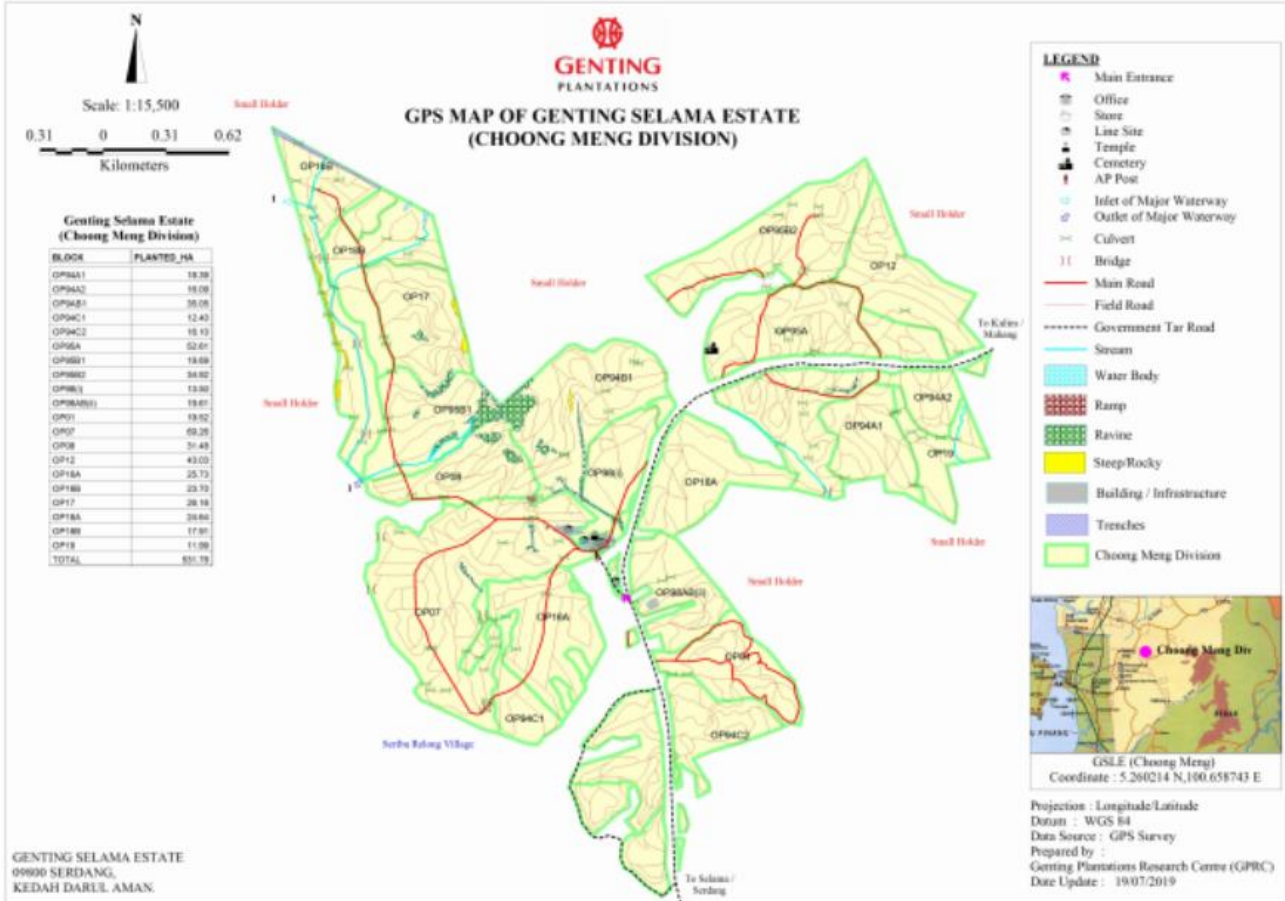
F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	N/A		

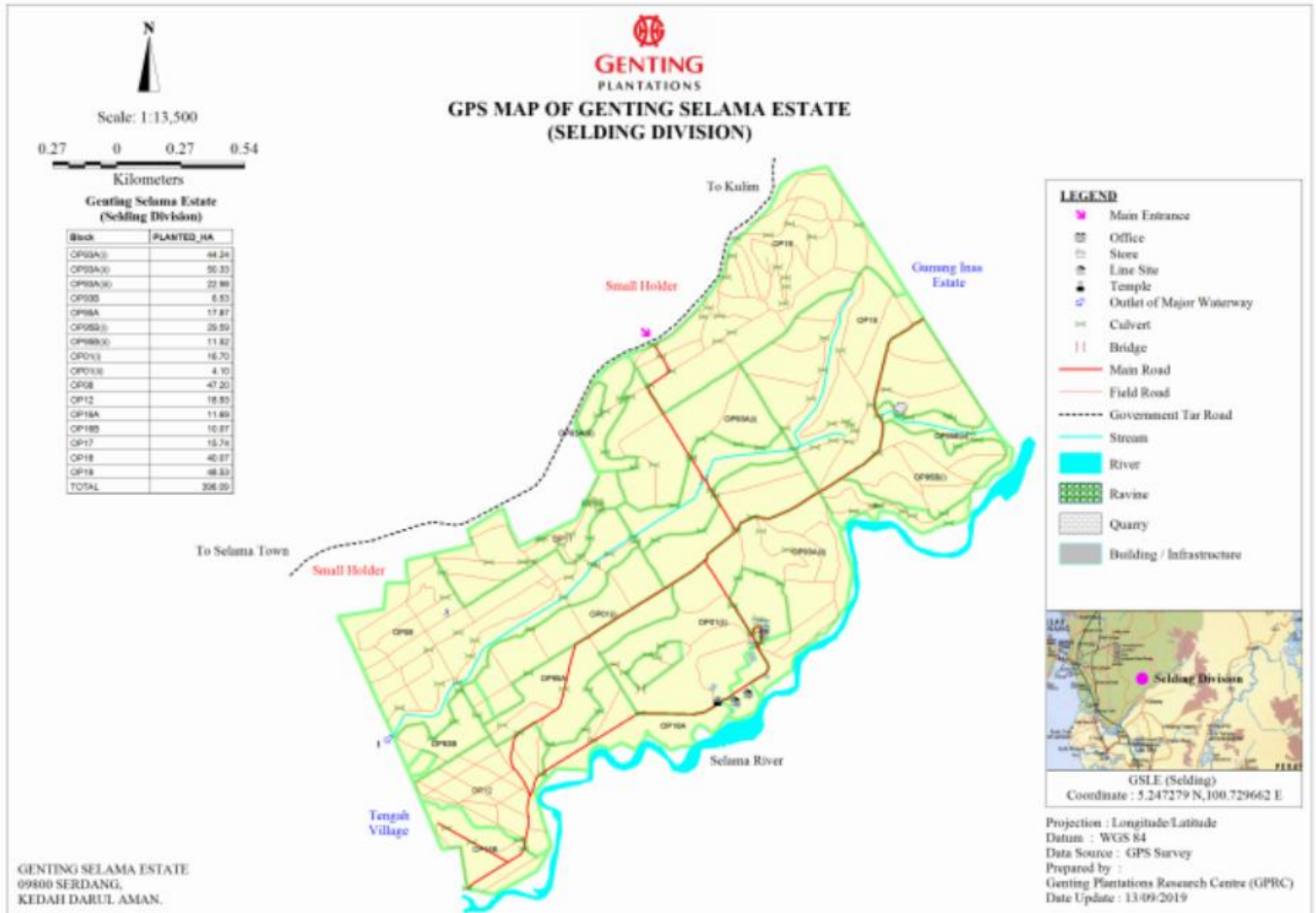
Appendix E: Location Map of Certification Unit and Supply bases



Appendix F: 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
GSLE	Genting Selama Estate
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