

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (ASA4)**
- Recertification Assessment
- Extension of Scope

<b>Client Company name (Parent Company): GENTING PLANTATIONS BERHAD</b>
Client company Address: 10th Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia.
Certification Unit: <b>Genting Sabapalm Oil Mill</b>  Location of Certification Unit: KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia.

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>Parent Company</b>	Genting Plantations Berhad		
<b>RSPO Membership Number</b>	1-0086-06-000-00	<b>Membership Approval Date</b>	14/11/2006
<b>Address</b>	10 <sup>th</sup> Floor, Wisma Genting, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia.		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Genting Sabapalm Oil Mill		
<b>Location / Address</b>	KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia.		
<b>Website</b>	<a href="http://www.gentingplantations.com">www.gentingplantations.com</a>		
<b>Management Representative</b>	Mr. Arunan Kandasamy (Senior Vice President –Plantation Division)	<b>E-mail</b>	Arunan.kandasamy@genting.com
<b>Telephone</b>	+603 2333 6510 (Head Office) +607 7631 992	<b>Facsimile</b>	+603 2333 6575

2. Certification Information			
<b>Certificate Number</b>	RSPO 653477	<b>Date of First Certification</b>	09/06/2016
		<b>Certificate Start Date</b>	09/06/2016
		<b>Certificate Expiry Date</b>	08/06/2021
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production		
<b>Visit Objectives</b>	<ul style="list-style-type: none"> <li>• Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> <li>• Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</li> </ul>		
<b>Applicable Standards</b>	<input type="checkbox"/> RSPO P&C 2018 with supply chain Module <input type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 with supply chain Module <input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MPOB/Cop/MF/0024-2	Code of Good Milling Practice for Palm Oil Mills	MPOB	20/12/2020
MSPO 689067 Genting Sabapalm Oil Mill	MSPO Part 4 for Palm Oil	BSI Services (M) Sdn Bhd	03/07/2024

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MSPO 689068 Genting Sabapalm Estate	MSPO Part 3 for Plantations	BSI Services (M) Sdn Bhd	03/07/2024
EU-ISCC-Cert-DE119-60203799	ISCC EU	ASG Cert GmbH	12/01/2021

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Genting Sabapalm Oil Mill	KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia.	5° 57' 54.3" N	117° 22' 26.8" E
Genting Sabapalm Estate	KM 25, Down Sg. Labuk, Mukim Tagas-Tagas, 90000 Beluran, Sandakan, Sabah, Malaysia.	5° 57' 54.3" N	117° 22' 26.8" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Sabapalm	3,954.23	8.95	395.40	4,358.58	87.96
<b>Total</b>	3,954.23	8.95	395.40	4,358.58	87.96

*Note: The difference in total area compared to previous report was due to reconfirmation of hectarage by Genting's internal surveyor department especially those fields which has undergone replanting. The total area, 4,358.58 Ha is to match the figure stated in the land title.*

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Sabapalm	71.95	789.00	1,744.15	1,052.22	296.91	3,882.28	71.95
<b>Total (ha)</b>	71.95	789.00	1,744.15	1,052.22	296.91	3,882.28	71.95

**Note:**

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<b>7. Certified Tonnage of FFB (Own Certified Scope)</b>				
Estate	Tonnage / year			
	Estimated (Jun 2019-May 2020)	Actual (Mar 2019-May 2020)		Forecast (Jun 2020-May 2021)
		Previous license period (Mar 2019-May 2019)	Current license period (Jun 2019-May 2020)	
Sabapalm	96,308.10	18,565.27	91,726.32	94,359.00
<b>Total</b>	96,308.10	18,565.27	91,726.32	94,359.00

**Note:**  
For the following license period i.e. Jun 2020-May 2021, the CU has produced 8,098.10 mt of FFB in Jun 2020.

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

**Note: -**

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b>				
Independent FFB Supplier	Tonnage / year			
	Estimated (Jun 2019-May 2020)	Actual (Mar 2019-May 2020)		Forecast (Jun 2020-May 2021)
		Previous license period (Mar 2019-May 2019)	Current license period (Jun 2019-May 2020)	
Smallholders	-	6,395.17	33,189.76	-
<b>Total</b>	-	6,395.17	33,189.76	-

**Note:**  
For the following license period i.e. Jun 2020-May 2021, the CU has received 2,874.15 mt of FFB in Jun 2020.

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10. Certified Tonnage				
	Estimated (Jun 2019-May 2020)	Actual (Mar 2019-May 2020)		Forecast (Jun 2020-May 2021)
		Previous license period (Mar 2019-May 2019)	Current license period (Jun 2019-May 2020)	
<b>Mill Capacity: 20 MT/hr</b>	<b>FFB</b>	<b>FFB</b>	<b>FFB</b>	<b>FFB</b>
	96,308.10	18,565.27	91,726.32	94,359.00
<b>SCC Model: MB</b>	<b>CPO (OER: 21.50%)</b>	<b>CPO (OER: 21.92%)</b>	<b>CPO (OER: 20.86%)</b>	<b>CPO (OER: 21.68%)</b>
	25,506.00	4,070.06	19,135.29	20,457.00
	<b>PK (KER: 4.30%)</b>	<b>PK (KER: 4.23%)</b>	<b>PK (KER: 3.89%)</b>	<b>PK (KER: 4.19%)</b>
	4,921.00	786.17	3,565.77	3,954.00
<b>Note: -</b>				

11. Actual Sold Volume (CPO) (Mar 2019-May 2020)					
Current License period (Jun 2019-May 2020)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	2,109.08	16,073.27	0	327.71	18,510.06
Previous License period (Mar 2019-May 2019)					
<b>CPO (MT)</b>	0	3,302.30	0	717.66	4,019.96
<b>Total</b>	2,109.08	19,375.57	0	1,045.37	22,530.02

12. Actual Sold Volume (PK) (Mar 2019-May 2020)					
Current License period (Jun 2019-May 2020)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>PK (MT)</b>	2,284.06	0	0	1,035.76	3,319.82
Previous License period (Mar 2019-May 2019)					
<b>PK (MT)</b>	660.18	0	0	204.04	1,864.22
<b>Total</b>	2,944.24	0	0	1,239.81	4,184.05

Note: <sup>1</sup>The sale is more than production (Table 10) due to there was 205.17 mt being brought forward from Feb 2019 production.

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



## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)  
Suite 29.01 Level 29, The Gardens North Tower,  
Mid Valley City, Lingkaran Syed Putra,  
59200 Kuala Lumpur, Malaysia.  
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639  
Representative: Nicholas Cheong ([Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com))  
Website: [www.bsigroup.com](http://www.bsigroup.com)

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

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site initial assessment was conducted from 6-9 July 2020. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out assessment was conducted off-site due to the movement control order by the government on 5 October 2020.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO P&C MYNI 2019 was used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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

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Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

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

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

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

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

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

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

**Tentative Date of Next Visit:** March 1, 2021 - March 4, 2021

**Total No. of Mandays:** 9.5

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**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Valence Shem (VSH)	Team Leader	He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. Able to communicate in Bahasa Malaysia and English. During the assessment, he covered the aspects of legal, environmental, smallholders and contractors engagement.
Muhamad Naqiuddin Mazeli (MNM)	Team Member	He holds Bachelor of Science Horticulture at University Putra Malaysia. He has 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company. He is a trained as Safety and Health Officer, Food Safety System (FSSC and ISO 22000) for Mill and refineries, ISO 9001, ISO 45001 and already attend HCV training with Proforest. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation.
Rahayu Zulkifli (RHZ)	Team Member	Rahayu graduated with a Law Degree from John Moores University, Liverpool, United Kingdom in 1988. She was a practicing lawyer before she joined several public listed companies as Head of Legal Department. In 2003 she joined an environmental NGO as a turtle conservationist, and in 2014 joined RSPO as Dispute Settlement Facility Manager. Rahayu is now a freelance auditor specializing in social aspects of the RSPO and MSPO standards, with audit experiences in Malaysia, Indonesia and Ghana. Rahayu successfully attended the RSPO-endorsed Lead Auditor course in 2014, ISO 14001 Lead Auditor course in 2016, the MSPO Awareness Training in 2016, and RSPO-endorsed Lead Auditor Refresher course in 2018. Additionally, Rahayu also assists in HCV assessments (in particular HCV 5 & 6), as well as carry out Social Impact Assessments. Rahayu is also a trained and certified Mediator. During this assessment, she assessed on the aspects of legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English.

**Accompanying Persons:**

<b>Name</b>	<b>Role</b>
NA	

### 2.3 Assessment Plan

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

Date	Time	Subjects	VSH	RHZ	MNM
Monday 6/7/2020	0830-0900	Opening meeting: <ul style="list-style-type: none"> <li>Opening presentation by audit team leader</li> <li>Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation)</li> </ul>	✓	✓	✓
	0900-1300	<b>Sabapalm Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓
	1000 - 1300	<b>Stakeholder consultations:</b> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-
	1300-1400	Lunch break			
	1400-1630	<b>Sabapalm Estate</b> Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓
	1630-1700	Interim closing briefing			
Tuesday 7/7/2020	0900-1230	<b>Sabapalm Estate</b> Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓
	1230-1300	Interim closing briefing			
	1300-1400	Lunch break			
	1400-1630	<b>Sabapalm Oil Mill</b> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	✓	✓	✓
	1630-1700	Interim closing briefing			

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Wednesday 8/7/2020	0900-1300	<b>Sabapalm Oil Mill</b> Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	✓	✓	✓
	1300-1400	Lunch break			
	1400-1630	<b>Sabapalm Oil Mill</b> Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	✓	✓	✓
	1630-1700	Interim closing briefing			
Thursday 9/7/2020	0900-1200	<b>Sabapalm Oil Mill</b> <b>RSPO Supply Chain</b> Site visit: Incoming of FFB and outgoing of CSPO & CSPK – weighbridge, ramp, storage area, loading bays, etc. Documentation review: RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	✓	-	-
	1200-1230	Audit team discussion & preparation for closing meeting	✓	✓	✓
	1230-1300	Closing meeting			

### Section 3: Assessment Findings

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

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

#### 3.2 Multiple Management Units and Time Bound Plan

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

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7.3.	Indonesia 1. PT GAL – LUCA under review by RSPO.																			
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	NPP for PT PALJ, PT AAC, PT UAI, PT SMA, PT KIU are in progress.	Complied																		
<p>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&amp;C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p><i>Note:</i>  <i>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>. The progress on the Liabilities shall be verified and reported. Please refer to BSI-RSPO Secretariat approval.</i></p>	<p>No new complaint. Latest was on 2016, Based on the following:  <a href="http://www.rspo.org/members/complaints/statusof-complaints/view/38">http://www.rspo.org/members/complaints/statusof-complaints/view/38</a>            Complaints officially closed on 31 October 2016.            From the update, RaCP status as per below:-</p> <table border="1" data-bbox="699 745 1278 1301"> <thead> <tr> <th>Unit</th> <th>RaCP status</th> <th>LUCA report status</th> </tr> </thead> <tbody> <tr> <td>PT Globalindo Agung Lestari</td> <td>Ongoing</td> <td>In progress (Clarification process)</td> </tr> <tr> <td>PT Sepanjang Inti Surya Mulia</td> <td>Completed</td> <td>Completed</td> </tr> <tr> <td>PT Agro Abadi Cemerlang</td> <td>Completed</td> <td>Completed</td> </tr> <tr> <td>Genting Jambongan Estate (GJBE)</td> <td>Ongoing</td> <td>Completed</td> </tr> <tr> <td>Genting Kencana Estate (GKCE)</td> <td>Ongoing</td> <td>Completed</td> </tr> </tbody> </table>	Unit	RaCP status	LUCA report status	PT Globalindo Agung Lestari	Ongoing	In progress (Clarification process)	PT Sepanjang Inti Surya Mulia	Completed	Completed	PT Agro Abadi Cemerlang	Completed	Completed	Genting Jambongan Estate (GJBE)	Ongoing	Completed	Genting Kencana Estate (GKCE)	Ongoing	Completed	Complied
Unit	RaCP status	LUCA report status																		
PT Globalindo Agung Lestari	Ongoing	In progress (Clarification process)																		
PT Sepanjang Inti Surya Mulia	Completed	Completed																		
PT Agro Abadi Cemerlang	Completed	Completed																		
Genting Jambongan Estate (GJBE)	Ongoing	Completed																		
Genting Kencana Estate (GKCE)	Ongoing	Completed																		
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labor dispute.	Complied																		
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Based on the following: <a href="https://askrspo.force.com/Complaint/s/casetracker">https://askrspo.force.com/Complaint/s/casetracker</a> No legal non-compliance	Complied																		
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes, The Internal audit was conducted for uncertified units on periodical basis by Sustainability Team. Positive assurance is stated in the internal audit report.	Complied																		
Have there been any stakeholder (including NGO) consultation conducted?	To-date, no comments received from stakeholders on the TBP.	Complied																		

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

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?  OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	NA as no scheme smallholders.	NA

**3.4 Details of Nonconformities**

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

During this Assessment there were four (4) Critical (Major); seven (7) Minor nonconformities and two (2) Opportunity For Improvement raised. The Genting Sabapalm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
<b>NCR Ref #</b>	1929260-202007-M1	<b>Clause &amp; Category (Critical / Minor)</b>	2.3.1 RSPO P&C MYNI-2018 Critical
<b>Date Issued</b>	9/7/2020	<b>Due Date</b>	6/10/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	5/10/2020
<b>Statement of Nonconformity:</b>	Evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder were not available.		
<b>Requirement Reference:</b>	(C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul>		
<b>Objective Evidence:</b>	The supporting document(s) to show the status of the third party FFB suppliers land ownership such as Land Application (LA); letter from Land & Survey		



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	<p>Department; Surat Tuai Rumah/ Ketua Kampung; letter from Jabatan Kemajuan Orang Asli (JAKOA) (for Peninsular); Temporary Occupation Lease (TOL); Provisional Lease; Alienated Land was not available for verification.</p> <p>Apart from that, some of the MPOB licenses of the third party FFB suppliers have yet to be obtained by the mill.</p>
<b>Corrections:</b>	<p>Mill to update the stakeholder list.</p> <p>To send memo to the FFB supplier requesting them to submit their copy of land title, LA/PT and other related documents for mill filling.</p>
<b>Root Cause Analysis:</b>	<p>Supporting document such as copy of land title, LA/PT and other related document was not requested previously because management thought that the PORLA license is sufficient as an evidence of ownership by the smallholders.</p>
<b>Corrective Actions:</b>	<p>Learning form this finding, the mill to update the stakeholder list which also serve as a checklist to guide the management on requesting the necessary documents required by the standard.</p>
<b>Assessment Conclusion:</b>	<p>The following evidences were verified:</p> <ol style="list-style-type: none"> <li>1) The updated stakeholder list which has the information about names of supplier, geo-location of FFB origin, land title and MPOB license</li> <li>2) A copy of the memo sent to the FFB suppliers requesting them to submit their copy of land title, etc.</li> <li>3) Some examples of copy of land title of the FFB suppliers &amp; the related MPOB license</li> <li>4) A copy of the Mill's FFB receiving procedure/supplier management procedure that shows the amendment has been done</li> </ol> <p>Based on the evidence of correction and corrective action, the NCR is effectively closed out. Continuous implementation shall be verified in the next assessment.</p>

Non-conformity			
<b>NCR Ref #</b>	1929260-202007-M2	<b>Clause &amp; Category (Critical / Minor)</b>	4.1.1 RSPO P&C MYNI-2018 Critical
<b>Date Issued</b>	9/7/2020	<b>Due Date</b>	6/10/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	5/10/2020
<b>Statement of Nonconformity:</b>	Policy to protect retaliation against Human Rights Defenders is not documented and communicated to all levels of workforce, operations, supply chain and local communities		
<b>Requirement Reference:</b>	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, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.		
<b>Objective Evidence:</b>	Genting Sabapalm Certification Unit is not able to demonstrate a documented Policy that: - Prohibits retaliation against Human Rights Defenders,		

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	- Prohibits intimidation and harassment by unit of certification and contracted services including contracted security forces. Consequently, it could not demonstrate that the above have been communicated to all levels of workforce, operations, supply chain and local communities.
<b>Corrections:</b>	To liaise with top management to get the policy approved by 31st Aug 2020.
<b>Root Cause Analysis:</b>	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.
<b>Corrective Actions:</b>	In the event unable to conduct physical meeting, SD (Sustainability Dept) to arrange online meeting/discussion with top management for discussion on new company policies.
<b>Assessment Conclusion:</b>	The following evidences were verified: 1) A copy of internal communication with top management on the approval of the Policy 2) A copy of the approved Policy dated 14/9/2020 3) Pictures that show the policy has been communicated to the employees through display on notice boards at several strategic locations  Based on the evidence of correction and corrective action, the NCR is effectively closed out. Continuous implementation shall be verified in the next assessment.

Non-conformity					
<b>NCR Ref #</b>	1929260-202007-M3	<b>Clause &amp; Category (Critical / Minor)</b>	6.2.3 RSPO P&C MYNI-2018 Critical		
<b>Date Issued</b>	9/7/2020	<b>Due Date</b>	6/10/2020		
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	5/10/2020		
<b>Statement of Nonconformity:</b>	1. GSPE: Workers' salary deductions were made without complying with the condition imposed by the Sabah Labour Office. 2. GSOM: Workers' overtime exceeding 104 hours were carried out without complying with the condition imposed by the Sabah Labour Office.				
<b>Requirement Reference:</b>	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.				
<b>Objective Evidence:</b>	1. Salary deductions for the following GSPE workers were made without complying with paragraph 2.2 of the Permit issued by the Sabah Labour Office dated 31 December 2019 (Serial No. 600-1/2/8/229 (11/SDK/2019-0339). Paragraph 2.2. requires that a written consent from the workers to be obtained for the salary deductions. However, for the following workers, no written consent was obtained:				
	<b>Estate</b>	<b>Workers'No</b>	<b>Month/Year</b>	<b>Travelling documents(RM)</b>	<b>Electricity (RM)</b>

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	Sabapalm Estate	E10936	May 2020	-	8.35																					
		E00813	May 2020	-	51.50																					
		E10155	Jan 2020	200.00	-																					
		E00663	May 2020	-	14.74																					
		E10847	May 2020	-	10.98																					
		E00005	May 2020	-	18.32																					
		E11276	May 2020	-	50.00																					
		<p>2. Overtime for the following GSOM workers were carried out without complying with paragraph 1.2 of the Permit issued by the Sabah Labour Office dated 18 May 2018 (Serial No. 600-1/2/13/9 (08/SDK/2018-0172). Paragraph 1.2 of the permit states that written consent from the worker is needed if they are required to do overtime exceeding 104 hours. However, for the following workers, no written consent was obtained:</p> <table border="1"> <thead> <tr> <th>Worker No</th> <th>Maximum hours per month</th> <th>Month/Year</th> </tr> </thead> <tbody> <tr> <td>E00011</td> <td>106 hours</td> <td>March 2020</td> </tr> <tr> <td>E00027</td> <td>112.5 hours</td> <td>March 2020</td> </tr> <tr> <td>E00230</td> <td>118.5 hours</td> <td>March 2020</td> </tr> <tr> <td>E00286</td> <td>111.5 hours</td> <td>June 2020</td> </tr> <tr> <td>E00294</td> <td>104.5 hours</td> <td>Oct 2019</td> </tr> <tr> <td>E00309</td> <td>105 hours</td> <td>Oct 2019</td> </tr> </tbody> </table>					Worker No	Maximum hours per month	Month/Year	E00011	106 hours	March 2020	E00027	112.5 hours	March 2020	E00230	118.5 hours	March 2020	E00286	111.5 hours	June 2020	E00294	104.5 hours	Oct 2019	E00309	105 hours
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E00286	111.5 hours	June 2020																								
E00294	104.5 hours	Oct 2019																								
E00309	105 hours	Oct 2019																								
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- Immediately get written approval from all workers concerned for the deductions made as per permits requirements from the date of permits.</li> <li>- Standard workers consent letter will be attached together with the employment agreement, which will be briefed during the Induction Training before signed by the workers.</li> </ul>																									
<b>Root Cause Analysis:</b>	There is no monitoring on the compliance of the <i>syarat-syarat pematuhan</i> as per permits requirement conducted by estate and mill management.																									
<b>Corrective Actions:</b>	To conduct training to estate and mill PIC on the Licence and permits compliance monitoring.																									
<b>Assessment Conclusion:</b>	<p>The following evidences were verified:</p> <p><u>Estate:</u></p> <ol style="list-style-type: none"> <li>1) A copy of signed consent letters from the sampled workers for the salary deductions</li> <li>2) training records on the Licence and permits compliance monitoring to estate and mill persons in-charge dated 15/9/2020</li> <li>3) attendance list dated 10/7/2020 at muster ground that shows workers have been briefed about the salary deductions</li> </ol> <p><u>Mill:</u></p> <ol style="list-style-type: none"> <li>1) attendance list dated 10/7/2020 at muster ground that shows workers have been briefed about the overtime work exceeding 104 hours/month</li> </ol>																									

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	<p>2) A copy of signed consent document from the mill workers that shows they agreed to carry out overtime work exceeding 104 hours/month if the management requires</p> <p>Based on the evidence of correction and corrective action, the NCR is effectively closed out. Continuous implementation shall be verified in the next assessment.</p>
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Non-conformity			
<b>NCR Ref #</b>	1929260-202007-M4	<b>Clause &amp; Category (Critical / Minor)</b>	6.5.2 RSPO P&C MYNI-2018 Critical
<b>Date Issued</b>	9/7/2020	<b>Due Date</b>	6/10/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	5/10/2020
<b>Statement of Nonconformity:</b>	Policy on reproductive rights has not been communicated to all levels of workforce.		
<b>Requirement Reference:</b>	A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.		
<b>Objective Evidence:</b>	A Social Policy dated 22 June 2015 was developed in which the Genting Plantations Berhad commits to respect and protect reproductive rights. However, there is no evidence this was communicated to all levels of workforce both GSPE and GSOM.		
<b>Corrections:</b>	Estate and mill to redo the policy briefing and the reproductive right must be highlighted to the workers and to be documented accordingly.		
<b>Root Cause Analysis:</b>	In adequate content in the policy and procedure training report.		
<b>Corrective Actions:</b>	Sustainability Department Sabah will organized training to OU's PIC on the method of policy briefing, documentation and record keeping in order improve their competency.		
<b>Assessment Conclusion:</b>	<p>The following evidences were verified:</p> <ol style="list-style-type: none"> <li>1) Attendance list dated 19/9/2020 that shows the workers of estate and mill have been explained about the policy on reproductive rights. The event took place at muster ground.</li> <li>2) Morning muster report that shows the explanation about reproductive rights was one of the briefing itinerary</li> <li>3) Attendance list dated 15/9/2020 that shows the operating unit's persons in-charge have been trained about documentation and record keeping</li> </ol> <p>Based on the evidence of correction and corrective action, the NCR is effectively closed out. Continuous implementation shall be verified in the next assessment.</p>		

Non-conformity			
<b>NCR Ref #</b>	1929260-202007-N1	<b>Clause &amp; Category (Critical / Minor)</b>	1.1.5 RSPO P&C MYNI-2018 Minor

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<b>Date Issued</b>	9/7/2020	<b>Due Date</b>	Next assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	NA
<b>Statement of Nonconformity:</b>	Stakeholders lists are incomplete and not updated.		
<b>Requirement Reference:</b>	There is a current list of contact and details of stakeholders and their nominated representatives.		
<b>Objective Evidence:</b>	<p>1) Timbalan Pengarah Pegawai Imigresen, AG Mohd Yusof who was named as the nominated representative of the Sandakan Immigration Office has retired, and this change has not been updated in the Stakeholder Lists of both GSPE and GSOM.</p> <p>2) GSPE employs 391 Indonesian workers and 2 Philippines nationals. GSOM employs 18 Indonesian workers. However, the Indonesian Consulate in Kota Kinabalu and the Philippines Embassy in Kuala Lumpur are not listed as stakeholders in both stakeholder lists.</p>		
<b>Corrections:</b>	To update the stakeholder list accordingly to include latest Timbalan Pengarah Pegawai Imigresen, Indonesian Consulate in Kota Kinabalu and the Philippines Embassy in Kuala Lumpur.		
<b>Root Cause Analysis:</b>	<p>1. Changes on the Immigration Dept director was not inform by HR-GPOS to the OU's, because OUs has no direct contact/deal with the Immigration Dept since any issue related to this department is handled by HRAD at GPOS.</p> <p>2. The Indonesia Konsulat Jeneral in Kota Kinabalu and Philippines Embassy in Kuala Lumpur was not included in the GSOM and GSPE stakeholder list because Sustainability Department Sabah misunderstood that they are irrelevant since GSOM and GSPE have no direct contact with them.</p> <p>* HRAD – Human Resources &amp; Administration Dept * GPOS – Genting Plantations Office Sabah, Sandakan.</p>		
<b>Corrective Actions:</b>	<p>OUs shall update and verify the stakeholder list at least once a year and/or before the internal sustainability audit and external certification audits – as per Social Management Procedure SMP-GPB-32, clause 6.2</p> <p>To update the social procedure to include the job responsibility of HR department to notify Operating unit of any changes.</p> <p>Trainings to the OUs and HR.</p>		
<b>Assessment Conclusion:</b>	The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.		

Non-conformity			
<b>NCR Ref #</b>	1929260-202007-N2	<b>Clause &amp; Category (Critical / Minor)</b>	3.3.2 RSPO P&C MYNI-2018 Minor
<b>Date Issued</b>	9/7/2020	<b>Due Date</b>	Next assessment

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<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	NA
<b>Statement of Nonconformity:</b>	Standard Operating Procedures are not consistently implemented.		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures is in place.		
<b>Objective Evidence:</b>	<p>1. Section 6.8.2 Procedure of Social Management (Doc. No. SMP-GPB-32, Rev. 00 dated 18 Jan 2018 states that Workers Committee Meetings shall be conducted at least quarterly or whenever necessary. However, records show that the Workers' Committee Meetings were held as follows:</p> <p>At GSPE: 18 June 2019 and 14 Feb 2020.</p> <p>At GSOM: 6 March 2020 and 8 Oct 2019.</p> <p>2. Clause 3 (ii) of SOP Revision 3 dated 11 October 2013 - Langkah-Langkah Perlu Dipatuhi di Kawasan Perumahan, Pusat Asuhan Kanak-Kanak dan Sekolah effective Januari 2011 states that all animal coups ("pondok binatang") must be at least 50 meters away from the housing. At the linesite in Bangkawat Division and Kpg Bahagia 1, chicken coups were placed approximately 10m - 15m from the workers' houses. In addition, housing inspection reports have also identified the issue of chicken coups locations in weekly inspection reports dated 7 Feb 2020, 11 Feb 2020, 20 April 2020, 18 May 2020, 4 June 2020, 22 June 2020.</p> <p>3. Harvester (Workers id: E11280, E11276 &amp; E11307) was not provided with the safety shoes, verified as per interview and issuance record. This does not comply with Standard Operating Procedure (SOP) revision 3 dated 11 Oct 2013.</p> <p>4. No health declaration was conducted before entering confined space as verified from PTW dated 4/5/2019 and 2/5/2019. This was not followed as per Safe Operating Procedure for Confined space (GSOM-SOP-MGR-03) dated 3 Jan 2010. Last health declaration conducted was on 2017</p>		
<b>Corrections:</b>	<p>1. GSPE and GSOM to prepare committee meeting schedule for the year 2020 and the schedule to be verified by Mill Manager and Estate Senior Manager. The Sustainability Department will conduct checking on the schedule compliance during monthly follow up visit.</p> <p>2. Estate to carry out SOP briefing to the Bangkawat workers and any animal coups must be kept away from housing as per SOP.</p> <p>3. PPE checklist during morning muster need to be conducted on a weekly basis to ensure all workers are provide with correct and proper PPE condition.</p> <p>4. i) Amend SOP for Confined space (GSOM-SOP-MGR-03)  ii) Conduct training to all workers on revised SOP for Confined space  iii) Health declaration form shall be attached with the PTW as a complete set</p>		

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	iii). Health declaration must be done prior to working in confine space
<b>Root Cause Analysis:</b>	<p>1. Frequency of meeting for GSPE Workers Committee (JCC) was not following the procedure requirements due to the PIC was never read the procedure and there is no checking by estate sustainability coordinator.</p> <p>2. The SOP clause 3(ii) and HA weekly housing inspection report regarding the chicken coops was not effectively implemented due to shortage of staff and increase work load in paper work</p> <p>3. No monitoring on PPE issuance conducted by the divisional staff and assistant.</p> <p>4. No proper checking by the mill manager/engineer and the SOP for confine space (GSOM-SOP-MGR-03) was not updated.</p>
<b>Corrective Actions:</b>	<p>1. GSOM and GSPE to schedule its committee meeting to be the same date with OSH Committee meeting. OSH committee meeting was conducted at least once in three month as per OSHA 1994 requirements.</p> <p>2. Estate to fully utilized the HA weekly housing inspection report and VMO monthly visiting book as source of information regarding this issue as well as other issue and prompt action to be taken and documented.</p> <p>3. Senior Assistant and assistant to verify the checklist and PPE stock must be adequate in the estate store.</p> <p>4. i) In October 2020, Person in-charge will be attended NIOSH course for Confined Space competent person ie Authorized Gas Tester, Entry Supervisor, Authorized Entry and Standby Person. Health Declaration form must be prepared for all confine space work by engineer and verified by mill manager. The health declaration must be checked by SHO during safety visit.</p>
<b>Assessment Conclusion:</b>	The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.

<b>Non-conformity</b>			
<b>NCR Ref #</b>	1929260-202007-N3	<b>Clause &amp; Category (Critical / Minor)</b>	3.4.2 RSPO P&C MYNI-2018 Minor
<b>Date Issued</b>	9/7/2020	<b>Due Date</b>	Next assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	NA
<b>Statement of Nonconformity:</b>	The activity of contractors keeping spare parts and maintenance at labour quarters have yet to be addressed.		



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<b>Requirement Reference:</b>	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.
<b>Objective Evidence:</b>	Based on the environmental aspect and impact assessment, the activity of contractors keeping spare parts and maintenance at the labour quarters have yet to be evaluated. It was found that trace of oil spillage at Block H, Kg Bahagia 1 where workers of a contractor (CM Enterprise).
<b>Corrections:</b>	Estate to assess the operation/activity and if the impact is significant, procedure/SOP must be prepared to mitigate the impact.
<b>Root Cause Analysis:</b>	The activity was not assessed by the estate, therefore no SOP available to mitigate the environmental impact
<b>Corrective Actions:</b>	Estate to review the current EAI to ensure all operation/activity are assessed. Training record to the estate Sustainability coordinator.
<b>Assessment Conclusion:</b>	The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.

Non-conformity			
<b>NCR Ref #</b>	1929260-202007-N4	<b>Clause &amp; Category (Critical / Minor)</b>	3.5.1 RSPO P&C MYNI-2018 Minor
<b>Date Issued</b>	9/7/2020	<b>Due Date</b>	Next assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	NA
<b>Statement of Nonconformity:</b>	There is no documented procedure for recruitment, selection, hiring, and promotion of workers.		
<b>Requirement Reference:</b>	Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination are documented and made available to the workers and their representatives where applicable.		
<b>Objective Evidence:</b>	The existing procedure Doc No. GEN-13 Rev 01 Issue Date 2017 entitled Procedural Instruction Foreign Workers Employment, Payment and Recoverable only covers procedures for employment and selection of foreign workers. The Genting Sabapalm certification unit therefore could not demonstrate the availability of documented procedures for <ul style="list-style-type: none"> <li>- Recruitment and selection of local workers; and</li> <li>- Promotion of foreign and local workers.</li> </ul>		
<b>Corrections:</b>	To conduct training regarding this procedure to the estate and mill PIC		
<b>Root Cause Analysis:</b>	There is mis-communication between RSPO auditor and estate PIC regarding the 2 requirements which is clearly stated in the SMP-GPB-32 page 25, Item 3. The procedure is available but due to the estate PIC was not train regarding the procedure therefore unable to explain and provide evidence.		
<b>Corrective Actions:</b>	Refresh training (annually) to be conducted to ensure competency level satisfactory.		



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<b>Assessment Conclusion:</b>	The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.
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Non-conformity			
<b>NCR Ref #</b>	1929260-202007-N5	<b>Clause &amp; Category (Critical / Minor)</b>	5.2.2 RSPO P&C MYNI-2018 Minor
<b>Date Issued</b>	9/7/2020	<b>Due Date</b>	Next assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	NA
<b>Statement of Nonconformity:</b>	The livelihood improvement programmes for smallholders supplying FFB has yet to be developed.		
<b>Requirement Reference:</b>	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder or RSIS).		
<b>Objective Evidence:</b>	There is no evidence that the livelihood improvement programmes for smallholders supplying FFB has been developed by the certification unit.		
<b>Corrections:</b>	Sustainability Department Sabah to conduct training to GSOM and GSPE on the programmes for smallholders. GSOM & GSPE to carry out consultation with the smallholders, assess their needs & develop a support programme.		
<b>Root Cause Analysis:</b>	The programmes was not available yes as this is new requirements under RSPO P&C 2019. However, there are some efforts done by the estate and mill to fulfil this criteria, but it was not recorded/ documented accordingly such as Fertilizer credit and FFB quality awareness conducted with MPOB personnel.		
<b>Corrective Actions:</b>	All initiative related to supporting livelihood of the smallholders to be programme and documented accordingly. Training to be conducted to the estate and mill PIC.		
<b>Assessment Conclusion:</b>	The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.		

Non-conformity			
<b>NCR Ref #</b>	1929260-202007-N6	<b>Clause &amp; Category (Critical / Minor)</b>	6.5.3 RSPO P&C MYNI-2018 Minor
<b>Date Issued</b>	9/7/2020	<b>Due Date</b>	Next assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	NA

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<b>Statement of Nonconformity:</b>	A new mother was not consulted on her needs by the Management.
<b>Requirement Reference:</b>	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.
<b>Objective Evidence:</b>	Employee No: 80001613 gave birth to her first child on 8 October 2019. However, Management has not been able to demonstrate that she was consulted on her needs as a new mother.
<b>Corrections:</b>	SD to conduct training/briefing to the estate and mill PIC regarding this requirements as well as to provide the documented assessment on the new mother needs.
<b>Root Cause Analysis:</b>	This is new requirements as per RSPO P&C 2019 and estate/mill PIC had not understand the requirements.
<b>Corrective Actions:</b>	Sustainability Department will conduct proper training in future on any new certification standard requirements.
<b>Assessment Conclusion:</b>	The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.

Non-conformity			
<b>NCR Ref #</b>	1929260-202007-N7	<b>Clause &amp; Category (Critical / Minor)</b>	7.11.3 RSPO P&C MYNI-2018 Minor
<b>Date Issued</b>	9/7/2020	<b>Due Date</b>	Next assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	NA
<b>Statement of Nonconformity:</b>	There was no evidence that the adjacent stakeholders were engaged in developing the fire prevention and control measures.		
<b>Requirement Reference:</b>	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.		
<b>Objective Evidence:</b>	Genting Sabapalm has drafted its fire prevention and control measures plan. However, there was no evidence that the adjacent stakeholders were engaged in developing it.		
<b>Corrections:</b>	Estate to identify the relevant/adjacent stakeholder and conduct briefing regarding this procedure.		
<b>Root Cause Analysis:</b>	The procedure was not communicated with the relevant stakeholders during the stakeholder meeting and no follow up action taken to inform regarding this procedure.		
<b>Corrective Actions:</b>	To include this procedure as an agenda during the stakeholder meeting.		
<b>Assessment Conclusion:</b>	The corrections and corrective action plans are accepted. The effective implementation shall be verified in the next assessment visit.		

Opportunity for Improvements	
OFI #	Description
OFI 1	1929260-202007-I1 Indicator 2.1.1 To ensure all workers that expose to noise (85-89dB or >90dB) are send for audiometric test as per recommendation (Report on Positive Initial Employee Noise Exposure Monitoring With Additional Areas dated 9 Oct 2012).
OFI 2	1929260-202007-I2 Indicator 5.1.4 The terms of fertilizer loan to the smallholders supplying FFB can be further improved by making the payment schedule more transparent and confidential.

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

### 3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1751086-201903-M1	Clause & Category (Major / Minor)	RSPO P&C MYNI-2014, Indicator 6.5.2 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	10/6/2019
Statement of Nonconformity:	Agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) was not available for the contractors' workers.		
Requirement Reference:	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.		
Objective Evidence:	GSPE: The employment contract for all contractors' workers was not available in GSPE.		
Corrections:	Estate (GSPE) to issue the latest Employment Agreement to the workers. To ensure the agreement is signed by the workers after briefed on the contents.		

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<b>Root Cause Analysis:</b>	The `contractors` workers` belong to estate (GSPE), but managed by contractor. Therefore, GSPE didn't issue the Employment Agreement to the workers.
<b>Corrective Actions:</b>	All workers with GENP work permit (recruited by GENP) shall be issued with Employment Agreement and pay slip by GSPE. All these workers shall be included into the estate's workers master list as well.
<b>Assessment Conclusion:</b>	<p>It was verified during the audit that the corrective action has been effectively implemented. The following contract workers' employment contracts and payslips (Oct 2019, Jan 2020 and June 2020) were sampled and verified during the audit:</p> <p>GSPE:</p> <p>Worker Nos. E11280 employment contract dated 10 July 2019          Worker No. E11313 employment contract dated 25 May 2019          Worker No. E11285 employment contract dated 2 Aug 2019          Worker No. E10155 employment contract dated 17 April 2017          Worker No. E11140 employment contract dated 2 Jan 2018</p> <p>Thus, the major NCR remains closed.</p>

Non-conformity			
<b>NCR Ref #</b>	1751086-201903-N1	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI-2014, Indicator 4.1.2 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	9/7/2020
<b>Statement of Nonconformity:</b>	Mechanism to check consistent implementation of procedures was not effectively implemented.		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures shall be in place.		
<b>Objective Evidence:</b>	<p>GSOM &amp; GSPE:            According to the Procedure of Social Management, Doc. No. SMP-GPB-32, Rev. 00 dated 18/1/2018, Section 6.8.2, Workers' Committee meeting shall be conducted at least quarterly or whenever necessary. However, the last meetings were conducted on 25/1/2019 and 24/3/2018 in GSOM and 12/2/2019 and 26/1/2018 in GSPE.</p> <p>GSOM:            According to the Procedure of Social Management, Doc. No. SMP-GPB-32, Rev. 00 dated 18/1/2018, Section 6.6.5, Gender Committee meeting shall be conducted at least 6 months once or whenever necessary. However, meeting was conducted on yearly basis and the last meeting for Year 2018 was held on 10/1/2018 and 14/2/2019 for Year 2019 in GSOM.</p> <p>GSPE: 1 (Employee No.: E11010) out of 22 workers sampled who is a FFB Checker found that she did not carry out her work as per the Procedure "Tugas Checker", Rev. 1 dated 2018 where she was supposed to ensure the FFBs were checked properly according to the quality of FFB and those off-grade FFB shall not be sent</p>		

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	to the oil mill. However, there were some unripe FFBs were sent to oil mill on November 2018 and February 2019 by verified through the payslip where deduction has been made according to the procedure.
<b>Corrections:</b>	A) To conduct the meeting as per procedure of Social Management, Doc. No. SMPGPB-32 and to included the requirements as per procedure into the Mill Schedule Master list. B) To conduct training to all estate checker as per SOP requirements.
<b>Root Cause Analysis:</b>	A) Failure to comply with the procedure requirements due to there is no monitoring on the meeting schedule. B) The estate FFB checker failure to comply/execute the task as per SOP due to the awareness and competency level was not adequate and there is no continuous training conducted to them.
<b>Corrective Actions:</b>	A) To conduct Workers & gender Committee meeting together with Osh Meeting and. B) The checker training and awareness to be included into the estate annual training plan.
<b>Assessment Conclusion:</b>	As of the date of the audit, the corrective actions for A) have not been implemented. Records show that Workers' Committee Meetings were held on 18.6.2019 and 14.2.2020 (at GSPE) and on 6.3.2020 and 8.10.2019 at GSOM. This is not in accordance with Section 6.8.2 Procedure of Social Management (Doc. No. SMP-GPB-32, Rev. 00 dated 18 Jan 2018 states that Workers Committee Meetings shall be conducted at least quarterly or whenever necessary.  For B), it was verified that the corrective action has been implemented and the FFB checker has been included in the estate annual training plan.  Thus, the NCR is closed

Non-conformity			
<b>NCR Ref #</b>	1751086-201903-N2	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI-2014, Indicator 6.10.4 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	9/7/2020
<b>Statement of Nonconformity:</b>	Agreed payments for the smallholders were not made in the agreed timeline as per in the Policy of Purchase of FFB.		
<b>Requirement Reference:</b>	Agreed payments shall be made in a timely manner.		
<b>Objective Evidence:</b>	GSOM: Sampled of the payment advices for FFB suppliers as below: a. Transaction Reference# 514939110100149 dated 13/12/2018 for FFB supplier. b. Transaction Reference# 515216800100204 dated 14/1/2019 for FFB supplier c. Transaction Reference# 515492970100014 dated 13/2/2019 for FFB supplier d. Transaction Reference# 514939110100307 dated 13/12/2018 for FFB supplier		

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	Verified from the Marketing Department confirmed that they have delayed in sending the invoice to the Finance Department for payment. Therefore, the payment was made after the agreed timeline which is before 12th of the following month.
<b>Corrections:</b>	Marketing Department to communicate the agreement with finance department on the payment condition to FFB supplier.
<b>Root Cause Analysis:</b>	The agreement details regarding the payment date for smallholders was not communicate by marketing with finance department.
<b>Corrective Actions:</b>	Marketing department to provide the invoice details to the Finance department within the timeline agreed to ensure finance department could process the payment to the FFB supplier.
<b>Assessment Conclusion:</b>	Based on sampled payment vouchers of the third party FFB suppliers, all payments were made in timely manner. Thus, the NCR is closed.

Non-conformity			
<b>NCR Ref #</b>	1751086-201903-N3	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI-2014, Indicator 2.1.3 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	9/7/2020
<b>Statement of Nonconformity:</b>	Mechanism for ensuring compliance was not implemented effectively.		
<b>Requirement Reference:</b>	A mechanism for ensuring compliance shall be implemented.		
<b>Objective Evidence:</b>	GSOM: The mill operates under MPOB license no 5000-280-0000 issued for period of 01/11/17-31/10/18. The license provides therein; a) Entitlement of menjual and mengalih FFB b) The total processed allowed is 96000 mt The mechanism for the monitoring the approved quantity is ineffective as the total FFB processed during (1/11/17 – 31/10/18) is 115793.57mt exceeding 19793.57mt equivalent to 20.61% of the approved quantity.		
<b>Corrections:</b>	Monitor year to-date FFB process by monthly basis.		
<b>Root Cause Analysis:</b>	There is no monitoring on the actual FFB process against the MPOB license.		
<b>Corrective Actions:</b>	Divert the FFB to other Genting oil mill for processing if projected to be over capacity by the year end or as per MPOB license validity period.		
<b>Assessment Conclusion:</b>	GSOM has look into other alternative since reducing its infeed FFB from third party suppliers especially the smallholders would cause significant impact on their socio-economic. Thus, the top management has made an effort to meet and consult with the MPOB Director on dd/mm/yyyy on how to go about this.		

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Non-conformity			
<b>NCR Ref #</b>	1751086-201903-N4	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI-2014, Indicator 4.8.2 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	9/7/2020
<b>Statement of Nonconformity:</b>	No training made in relation to peat soil management.		
<b>Requirement Reference:</b>	Records of training for each employee shall be maintained.		
<b>Objective Evidence:</b>	GSPE: During the field visit at Block 67 P2010 peat area, the accompanying team was unable to explain the procedure of the following; a) Water level reading b) Subsidence level recording		
<b>Corrections:</b>	A) To get new SOP/Guideline on Peat Soil Management B) To conduct simplified awareness training on Whistle Blowing Policy		
<b>Root Cause Analysis:</b>	A) No SOP/ Guideline and training on peat soil management. B) Level of understandings among the workers are low even with training provided.		
<b>Corrective Actions:</b>	A) SOP/Guideline training on Peat Area Management will be held at Genting Suan Lamba Estate on 10th April 2019. B ) Policy training including Whistle Blowing to be explained during the Induction course for new workers and simplified Whistle Blowing Policy flow chart to be displayed at prominent sites.		
<b>Assessment Conclusion:</b>	The peat area in field 2010 block 67 verified during site verification, interview with pic showed they understand regarding to water level and piezometer. The latest monitoring conducted on 2 June 2020 and subsidence was on 27 June 2020 thus minor NCR was close accordingly. Latest training was done on Sept 2019.		

Non-conformity			
<b>NCR Ref #</b>	1751086-201903-N5	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI-2014, Indicator 4.4.1 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	9/7/2020
<b>Statement of Nonconformity:</b>	Water Management Plan were not effectively implemented.		
<b>Requirement Reference:</b>	An implemented water management plan shall be in place.		
<b>Objective Evidence:</b>	GSOM: Drinking water analysis should be conducted on quarterly basis as per Sustainability Management Procedure Manual. Refer document no. SMP-GPB-15. Noted during the document review, the mill conducted the drinking water analysis only once for FY2018. Refer certificate of analysis no. 20180222-09- 0.		



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<b>Corrections:</b>	Prepare the Quarterly basis schedule to send out the sample of drinking water for analysis.
<b>Root Cause Analysis:</b>	Drinking water analysis sample, no send out for testing by 3rd party.
<b>Corrective Actions:</b>	Monthly review on the schedule master list to avoid any miss out sample send for analysis.
<b>Assessment Conclusion:</b>	Based on drinking water analysis report [W200129/04B (29/1/2020), W190926/01 (24/9/2019) and 20190214/02A (14/2/2019)], it showed that the frequency of testing is done accordingly. Nonetheless, slight delay is expected for the next sampling test due to the Covid-19 movement control order. Thus, the NCR is satisfactorily closed out.

Non-conformity			
<b>NCR Ref #</b>	1751086-201903-N6	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI-2014, Indicator 5.3.3 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	9/7/2020
<b>Statement of Nonconformity:</b>	Waste management plan was not effectively implemented.		
<b>Requirement Reference:</b>	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.		
<b>Objective Evidence:</b>	<p>GSOM: Used PPE were identified as Scheduled Waste in the Identification, Segregation and Storage of Waste. Noted during interview with the storekeeper, as per mill practice, workers who requested to replace used PPE have to return the old PPE to be stored in the Scheduled Waste Store before disposed by licensed contractors. However, no evidence of used PPE inventory and disposal. This indicates the waste management plan is not effectively implemented.</p> <p>GSPE: As per waste management plan, domestic waste schedule to be collected on weekly basis. Noted during document review in Landfill monitoring record book, the domestic waste for the month of December 2018, January and February 2019 were not collected as per scheduled. Used PPE were identified as Scheduled Waste in the Identification, Segregation and Storage of Waste. Noted during interview with the storekeeper, as per estate practice, workers who requested to replace used PPE have to return the old PPE to be stored in the Scheduled Waste Store before disposed by licensed contractors. However, no evidence of used PPE disposal.</p>		
<b>Corrections:</b>	<p>GSPE: A) To appoint dedicated drivers for rubbish collection based on rubbish collection schedule and weekly monitoring by person in charge. B) To conduct proper training for the person in charge and Assistant Manager on monitoring and documentation record of disposal SW 410 (used PPE). To dispose SW 410(used PPE) through Lagenda Bumi Mas Sdn.Bhd</p> <p>GSOM: Retrain store attendant and all workers on the Scheduled Waste Management System.</p>		



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<b>Root Cause Analysis:</b>	<p>GSPE: A) There was no dedicated driver to collect rubbish as per collection schedule and no monitoring from the person in charge.</p> <p>B) Ineffective training and monitoring for the person in charge on disposal and recording of SW 410 (used PPE).</p> <p>GSOM: No used PPE disposal in Schedule waste store.</p>
<b>Corrective Actions:</b>	<p>GSPE: A )1) Inspection will be done by the person in charge on weekly basis. Respective Estate Housing Ketua Kampung to inform person in charge regarding any delay on Rubbish collection.</p> <p>B ) 1) To conduct training for Storekeeper &amp; Assistant Manager annually 2) To include Scheduled Waste Training in Estate Training Matrix 3) To dispose SW410(used PPE) together with other Scheduled waste materials.</p> <p>GSOM To conduct training and check on the month disposal schedule waste inventory record for any schedule waste not recorded.</p>
<b>Assessment Conclusion:</b>	Based on landfill monitoring records book, the wastes collection was done on schedule. Used PPE has been categorized as SW and disposed through Lagenda Bumimas. Records of consignment notes were available for verification. Thus, the minor NCR is closed.

<b>Opportunity for Improvement</b>	
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)
Minor 1 – (previous CB)	Minor	6.5.3	20/08/2015	Closed out on 23/05/2017
1463422-201704-M1	Major	6.1.3	12/04/2017	Closed out on 23/05/2017
1463422-201704-M2	Major	6.5.2	12/04/2017	Closed out on 23/05/2017
1463422-201704-M3	Major	6.10.2	12/04/2017	Closed out on 23/05/2017
1463422-201704-N1	Minor	6.2.3	12/04/2017	Closed out on 18/04/2018
1463422-201704-N2	Minor	4.7.3	12/04/2017	Closed out on 18/04/2018
1463422-201704-N3	Minor	4.7.5	12/04/2017	Closed out on 18/04/2018
1621036-201803-M1	Major	SC 5.3.1	19/04/2018	Closed out on 15/06/2018
1621036-201803-M2	Major	SC 5.3.2	19/04/2018	Closed out on 15/06/2018

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1621036-201803-M3	Major	SC 5.13.1	19/04/2018	Closed out on 15/06/2018
1621036-201803-M4	Major	SC 5.13.2	19/04/2018	Closed out on 15/06/2018
1621036-201803-M5	Major	SC 5.13.3	19/04/2018	Closed out on 15/06/2018
1621036-201803-M6	Major	5.6.1	19/04/2018	Closed out on 15/06/2018
1621036-201803-N1	Minor	2.2.3	19/04/2018	Closed out on 12/03/2019
1751086-201903-M1	Major	6.5.2	12/03/2019	Closed out on 10/06/2019
1751086-201903-N1	Minor	4.1.2	12/03/2019	Closed out on 09/07/2020
1751086-201903-N2	Minor	6.10.4	12/03/2019	Closed out on 09/07/2020
1751086-201903-N3	Minor	2.1.3	12/03/2019	Closed out on 09/07/2020
1751086-201903-N4	Minor	4.8.2	12/03/2019	Closed out on 09/07/2020
1751086-201903-N5	Minor	4.4.1	12/03/2019	Closed out on 09/07/2020
1751086-201903-N6	Minor	5.3.3	12/03/2019	Closed out on 09/07/2020
1929260-202007-M1	Critical	2.3.1	09/07/2020	Closed out on 05/10/2020
1929260-202007-M2	Critical	4.1.1	09/07/2020	Closed out on 05/10/2020
1929260-202007-M3	Critical	6.2.3	09/07/2020	Closed out on 05/10/2020
1929260-202007-M4	Critical	6.5.2	09/07/2020	Closed out on 05/10/2020
1929260-202007-N1	Minor	1.1.5	09/07/2020	Open
1929260-202007-N2	Minor	3.3.2	09/07/2020	Open
1929260-202007-N3	Minor	3.4.2	09/07/2020	Open
1929260-202007-N4	Minor	3.5.1	09/07/2020	Open
1929260-202007-N5	Minor	5.5.2	09/07/2020	Open
1929260-202007-N6	Minor	6.5.3	09/07/2020	Open
1929260-202007-N7	Minor	7.11.3	09/07/2020	Open

**3.5 Stakeholders and previous land owner / user consultation**

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

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

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

<b>List of Stakeholders contacted</b>	
<b>Internal Stakeholders</b> Workers of estate and mill Store clerk Administration clerks	<b>Union/Contractors/Communities</b> Gender committee representative Estate’s grocery SK Ladang Sabapalm Kampung Tagas Tagas CPO & PK transport contractor Neighbouring estate Smallholders
<b>Government Departments</b> Immigration Dept., Kota Kinabalu	<b>NGO</b> Nil

<b>Stakeholders comment</b>	
<b>IS #</b>	<b>Description</b>
<b>1</b>	<p><b>Feedbacks:</b>                      Local communities and smallholders from Kg Tagas Tagas confirmed good relationship with GSOM. They confirmed that there is no land claims against GSOM. The smallholders are grateful for the assistance GSOM renders in the purchase of fertilizer for their crop, which is repayable in 6 monthly instalments.</p> <p><b>Management Responses:</b>                      Noted the local communities’ and smallholders’ comments.</p> <p><b>Audit Team Findings:</b>                      No further issue.</p>

<p><b>2</b></p>	<p><b>Feedbacks:</b></p> <p>SK Ladang Sabapalm is a primary school where its pupils comprise mainly estate workers’ children and some pupils from Kg Tagas Tagas. The Headmaster of SK Ladang Sabapalm informed that because the estate premises in located within the land lease of GSPE, the school is no longer entitled to financial assistance/budget allocation from the government. Therefore, it is now relying on the contributions in cash and in kind from GSOM and GSPE, for which they are grateful. Among the contributions received included paint, wood for repairs, tables and chair, free electricity and treated water, repair works, housing for teachers, etc.</p> <p><b>Management Responses:</b></p> <p>Contributions to SK Ladang Sabapalm will continue as part of its CSR programme.</p> <p><b>Audit Team Findings:</b></p> <p>Sighted evidence of cash and in-kind contributions from GSPE to SK Ladang Sabapalm which include repairs, supply of treated water, maintenance work, tables and chairs, etc. Visit to the linesite also shows that the houses occupied by the teachers have not been earmarked for demolition. No further issue.</p>
<p><b>3</b></p>	<p><b>Feedbacks:</b></p> <p>Contractors confirmed that business relationship with GSOM is good. Payments are received in a timely manner. Contracts are clear and fair. They receive invitations from GSOM to attend stakeholder meetings where awareness briefings were given on MSPO, RSPO, ISCC requirements.</p> <p><b>Management Responses:</b></p> <p>Comments are noted.</p> <p><b>Audit Team Findings:</b></p> <p>Sighted contracts between GSOM and transporters which have been verified as fair, legal and transparent. Invoices and payment vouchers were also sighted and confirmed that payments are being made in a timely manner.</p>



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
NA					
Note: Genting Sabapalm Estate was acquired from Kwong Borneo in 1967. The crop during acquisition was Oil Palm. As of to date, there have been two cycles of oil palm planting done.					

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

### 3.6 Impartiality and conflict of interest

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

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<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Genting Sabapalm Oil Mill Certification Unit has complied with the RSPO P&amp;C MYNI 2019 Standard 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 Sabapalm Oil Mill Certification Unit is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> Valence Shem	<b>Name:</b> Arunan Kandasamy
<b>Company Name:</b> BSI Services Malaysia Sdn Bhd	<b>Company Name:</b> Genting Plantations Berhad
<b>Title:</b> Lead Auditor	<b>Title:</b> SVP Plantation (Malaysia)
<b>Signature:</b> 	<b>Signature:</b> (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.) 
<b>Date:</b> 30/10/2020	<b>Date:</b> 06/11/2020

**Appendix A: Summary of Findings**

Criterion / Indicator		Assessment Findings	Compliance
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1:</b> 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><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Genting Sabapalm Oil Mill and Genting Sabapalm Estate has implemented Enquiry Register Book to record all the requests from the stakeholders. The company has issued a memo with a list of documents that could be requested by the stakeholders dated 4/4/2017. Among the documents and records that can be requested such as policies, SEIA reports, stakeholder meeting minutes, internal and external audit reports, management plans and procedures such as complaint and grievances, sexual harassment and negotiation and compensation. The stakeholders have been informed about their as stakeholders during the last stakeholder meeting which was conducted on 10/3/2020. Interview with the stakeholders such as contractors, local communities and workers confirmed that they are aware of and understand that they have rights to participate in the decision making. Since the last assessment, the was only one request dated 16/4/2019 from a neighbouring estate on biodiversity report. The request was approved accordingly.</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>The unit of certification has no restriction to provide any information according to the standard guidance. All the information is available in English or Bahasa Malaysia or both languages and will be provided by the certification unit upon request.</p>	Complied
1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.</p>	<p>Both the GSPE and GSOM maintain an Enquiry Register Book each which is used by stakeholders when requesting for information.</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>Sighting of the book at GSPE showed that the last request was entered on 16 April 2019 for a request of the Biodiversity Report. The response to the request was duly marked in the Enquiry Register Book. As of the date of this audit there has been no further requests for information from third parties at either GSPE or GSOM.</p> <p>Apart from the above, evidence is available that GSPE provided information to MPOB via letter dated 4 June 2020 related to monthly FFB output, information on total hectarage, average OER and estate labour force were provided.</p> <p>At the GSOM, requests for information from the Sabah Department of Environment and the response provided by GSOM were duly maintained. This was evidenced via GSOM's letter dated 13 May 2020 to the Sabah Department of Environment which provided relevant documents to support its application for licence renewal. Sighted also was a letter from the Sabah Dept of Environment dated 6 July 2020 informing that the information provided was incomplete and detailed out the required information.</p>	
<p>1.1.4</p>	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.          - Critical (Major) compliance -</p>	<p>Consultation and communication procedures are available via document No. SMP-GPB-17 Latest Revision 02 dated 23 Feb 2018. This procedure is disclosed and made available to all stakeholders during a joint stakeholder meeting as evidenced via Stakeholder Meeting minutes dated 10 March 2020. The briefing was conducted by the nominated management official, i.e. the Sustainability Manager.</p> <p>Implementation of this procedure was seen during the said Stakeholder Meeting where stakeholders were engaged in two-way communication and discussion with GSPE and GSOM. Among the issues discussed with stakeholders were requests for road repairs,</p>	<p>Complied</p>



		<p>smallholder’s request to send FFB up to 5PM instead of 3PM, request for repairs on school premises, and complaint by teacher about underaged children riding motorbike dangerously.</p>	
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 Stakeholder Lists for both GSPE and GSOM Mill were updated up to June 2020, contain stakeholders such as contractors, suppliers, smallholders, neighbouring estates and businesses, government agencies, clinics, schools, local communities, NGO, etc. The list also contains details of the stakeholder such as their names, nominated representatives and their designation, addresses and contact numbers.</p> <p>However, the Timbalan Pengarah Pegawai Imigresen who was named as the nominated representative of the Sandakan Immigration Office has retired, and this change has not been updated.</p> <p>Additionally, as of June 2020, a total of 391 Indonesian migrant workers are being employed by GSPE. GSPE also employs 2 migrant workers from the Philippines. However, the Indonesian Consulate office and Philippines Embassy are not listed as stakeholders in both Stakeholders lists.</p> <p>Therefore, a Minor Non-Compliance was issued.</p>	Non-compliance
<p><b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
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>GSPE and GSOM subscribe to Genting Plantations’ Ethical Conduct and Integrity Policy dated 22 June 2015 which was signed by the President &amp; Chief Operating Officer of Genting Plantations. The Policy states that all employees of the Group are expected to adhere to the following values:</p>	Complied

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		<ul style="list-style-type: none"> <li>- respect for refrain from all forms of corruption, bribery and fraudulent use of funds and resources;</li> <li>- fair conduct of business;</li> <li>- full, fair and accurate disclosure of relevant facts in all reports and documents dealing with applicable rules and regulations;</li> <li>- respect for and protect confidential and privileged information to which they have access to in their course of business.</li> </ul> <p>There is evidence that the ethical conduct is being implemented in the sampled business operations. This was confirmed during interviews with stakeholders. Telephone interview with GSPE's FFB transporter, Syarikat Tan Hong Transport, confirmed that he was briefed and is aware of the estate's ethical policy.</p>	
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>The system that has been put in place to monitor compliance and implementation of the Group's Ethical Conduct and Integrity Policy include:</p> <ul style="list-style-type: none"> <li>- Signing of conflict of interest declarations for executive and staff. Sighted during the audit was the declaration signed by one GSPE's Estate Assistant Manager.</li> <li>- Annual internal audit of company business practices is also carried out with the last audit done in October 2019 by Sandakan Regional Office Internal Audit Department.</li> <li>- To ensure minimal interface and handling of cash at estate/mill levels, all payments are made out from the Sandakan Regional Office. This was confirmed by contractor Juita Baru Sdn Bhd and Syarikat Tan Hong Transport during the audit.</li> </ul>	Complied

		- Contractors are required to sign an Addendum document which confirmed their awareness of the Ethical & Integrity Policy. Sighted during the audit were Addendums signed by CPO and PK transporters, Juita Baru Sdn Bhd and Landasan Kembar Sdn Bhd.	
<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<b>(C)</b> The Unit of Certification complies with legal requirements - Critical (Major) compliance -	<p>All legal requirement has documented in Legal Requirement Register. Refer doc no. SMP-GPB-22 rev. 08 dated March 2020. The latest review included the Ethical Business Conduct.</p> <p>Compliance to each applicable law and regulation is monitored by the operating units through List of License, Permits and Approval Certificates. Refer document no. SP-MGR-03-F02-01. Latest review was conducted on Jan 2020.</p> <p>Sighted the sampled evidence of compliancy to the regulation as follows: Genting Sabapalm Estate</p> <ol style="list-style-type: none"> <li>1. MPOB license 523495002000 valid until 30/09/2020</li> <li>2. License for Pemasangan Persendirian (2018/00242) valid until 28/04/2021</li> <li>3. License for Air compressor PMT-SB 1926579 valid until 28 Nov 2020</li> <li>4. License for Air compressor PMT-SB 1928043 valid until 16 Jan 2021</li> <li>5. JTK license for wages deduction (600-1/2/13/9(11/SDK/2020/8-0380) valid until 9 Dec 2020.</li> </ol>	Complied

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		<p>6. License for Petrol keeping (KPDNHEP.SDK.12/2012/(SK)(S002409) valid until 12/9/2020</p> <p>Genting Sabapalm POM</p> <ol style="list-style-type: none"> <li>1. Weighbridge certificate by Metrology Corporation Malaysia under no B1200052 and B1200051 valid until dated 14/7/2020</li> <li>2. Power Generation License 2019/03201 valid until 31/12/2020</li> <li>3. MPOB license 500002-804000 valid until 31/10/2020</li> <li>4. Jadual Pematuhan (001878) ASSH(B)31/152000/014 valid from 29/3/2019 until 30/6/2020.</li> <li>5. PPDNKK.SDK&gt;198/1979(SK) license S000600 for Diesel, valid until 14 March 2021</li> <li>6. Fire certificate renewal still in progress as per letter JBPM/SB/ZSD:700-3/1/7-36(54) dated 27 May 2020, this Bomba permission was valid until 26 may 2021 (JBPM: SB/7/55/2020</li> <li>7. Medical surveillance was done annually as per recommendation by CHRA assessor, latest record was on 15 August 2019 with total 12workers attend by DR Sanjay (HQ/18/DOC/00/00201) DAB OH Sdn Bhd. The result showed all workers who underwent MS fit to work in work unit handling chemicals.</li> <li>8. Hearing conservation training conducted on 1 April 2019 by manager mill Mr Yee Chee Fui. To ensure all workers that expose to noise (85-89dB or &gt;90dB) are send for audiometric test as per recommendation (Report on Positive Initial Employee Noise Exposure Monitoring With Additional Areas dated 9 Oct 2012) (OFI)</li> </ol>	
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		<p>9. Boundary Noise monitoring report in Sabapalm Mill by Sherman Services &amp; Supply dated of monitoring 18-19 Feb 2019. The result was meet the requirement as specific by the Planning Guidelines for Environmental Noise Limits and Control 2004.</p> <p>10. Air receiver SB PMT9418 (license no. PMT-SB/19 25797) valid until 5/8/2020</p>	
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>All legal requirement has documented in Legal Requirement Register.</p> <p>Refer doc no. SMP-GPB-22 rev. 06 dated 31 Jan 2019. The latest review included the Minimum Wages Order 2018.</p> <p>Compliance to each applicable law and regulation is monitored by the operating units through List of License, Permits and Approval Certificates. Refer document no. SP-MGR-03-F02-01. Latest review was conducted on Jan 2020.</p>	Complied
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Legal boundaries at estates visited were clearly demarcated with red and white colour concrete pole/ wooden stick. Sighted during site visit at the estates boundaries. Sampling at site visit – Field 36 and Mokterudin Buyong</p>	Complied
<p><b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>List of all contracted parties were maintained in the operating unit's stakeholder list. The latest list was last updated in June 2020.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p>	<p><u>Sabapalm Estate</u></p> <p>Based on samples of three contractors (Qwek Enterprise, Syarikat C.M and Syarikat Tan Hong Transport), the requirements to comply with applicable laws are stipulated in the contract agreements under Clause 2 and 3. Among the applicable laws mentioned are OSHA, EQA, FMA to name a few.</p>	Complied

	- Minor compliance -		
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 -	Clauses disallowing child, forced and trafficked labour are covered under Clause 2.5 D of the contract agreement. Based on the employee’s database and interview with workers, there was no evidence of child labour, forced and trafficked labour being practiced by the operating units.	Complied
<b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<b>(C)</b> For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> - Critical (Major) compliance -	A list of all directly sourced FFB is available. It has the information about names of the suppliers, MPOB License number, geo-location, address, hectarage and MSPO/RSPO/ISCC certification status. So far there were 141 suppliers were registered. There are approximately 117 suppliers in progress to be registered. The supporting document(s) to show the status of the third party FFB suppliers land ownership such as Land Application (LA); letter from Land & Survey Department; Surat Tuai Rumah/ Ketua Kampung; letter from Jabatan Kemajuan Orang Asli (JAKOA) (for Peninsular); Temporary Occupation Lease (TOL); Provisional Lease; Alienated Land was not available for verification.  Apart from that, some of the MPOB licenses of the third party FFB suppliers have yet to be obtained by the mill. Thus a non-conformity report was assigned due to this lapse.	Non-compliance
2.3.2	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. - Minor compliance -	There is only one indirect FFB supplier i.e. PL Sawit Sdn Bhd. GSPOM is in the process of obtaining the information mentioned in Indicator 2.3.1 and expected to be completed within the timeframe.	Complied
<b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b>			
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.			

<p>3.1.1</p>	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.          - Critical (Major) compliance -</p>	<p>The business plan comprises established for financial from 2020-2023.          a) Crop intake.          b) Processing cost RM/mt          c) Extraction rates.          d) CAPITAL expenditures.</p> <p>Similarly, the Sabapalm estate possessed a similar budget format. Inclusive there is also a 5-year budget/forecast financial plan 2020-2025 allocating categories among others such as:-          a) Crop yielding area          b) Mature cost          - Weeding/drainage/pest/          - Supplying/roads/bridges/paths/TAS Road/          - Terracing/pruning/sanitation          c) Manuring/harvesting &amp; Collection/Weeding          d) Transportation /depreciation/General Charges          e) Cost/ha &amp; cost /mt FFB          f) CAPEX          For Sabapalm Palm oil Mill;-          a) FFB processed / CPO/CPK production          b) General Charges          - Supervision/Office &amp; admin expenses          - Indirect labour          c) Processing          d) Despatch</p>	<p>Complied</p>						
<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.          - Minor compliance -</p>	<p>The replanting programme was available for review in Sabapalm estate as per detail below:-</p> <table border="1" data-bbox="1137 1278 1809 1375"> <thead> <tr> <th>Years</th> <th>Replanting (Ha)</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>290.99 (29A,23,12,13,16,17,18,29,9)</td> </tr> <tr> <td>2022</td> <td>200.79 (11,10,14,15,K5,K6)</td> </tr> </tbody> </table>	Years	Replanting (Ha)	2020	290.99 (29A,23,12,13,16,17,18,29,9)	2022	200.79 (11,10,14,15,K5,K6)	<p>Complied</p>
Years	Replanting (Ha)								
2020	290.99 (29A,23,12,13,16,17,18,29,9)								
2022	200.79 (11,10,14,15,K5,K6)								

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		<table border="1"> <tr> <td>2023</td> <td>174.74 (103A,22,24,30,31)</td> </tr> <tr> <td>2024</td> <td>119.89 (28,42,38B,43,44)</td> </tr> <tr> <td>2025</td> <td>105.46 (72,73,74,75,45)</td> </tr> <tr> <td>Total</td> <td>891.87</td> </tr> </table>	2023	174.74 (103A,22,24,30,31)	2024	119.89 (28,42,38B,43,44)	2025	105.46 (72,73,74,75,45)	Total	891.87	
2023	174.74 (103A,22,24,30,31)										
2024	119.89 (28,42,38B,43,44)										
2025	105.46 (72,73,74,75,45)										
Total	891.87										
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>The management review was done periodically based, latest record was on 25 June 2020. The discussion was include the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO. Procedure Manual under section Management Review refer document no SMP-GPB-06 rev 1 dated 25/5/2018.</p>	Complied								
<p><b>Criterion 3.2:</b> 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><b>(C)</b> 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>The continuous improvement plan covered Environmental, Safety and Social as per below:-</p> <ol style="list-style-type: none"> <li>1. Waste reduction</li> <li>2. Pollution and greenhouse gas</li> <li>3. Social</li> <li>4. Encourage optimizing the yield of the supply base</li> <li>5. Water consumption and water quality and</li> <li>6. Safety and health performance</li> </ol>	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><b>PROCEDURAL NOTE:</b></p>	<p>The management already send the latest ACOP 2019. Verified as per record ACOP in web page.</p>	Complied								



	<p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>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><b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
<p>3.3.1</p>	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>The estates and mills are guided by the following manuals</p> <p>a) Genting Plantations Oil Palm Manual OPM issued on 9/11/99 updated 30 August 2013.</p> <ul style="list-style-type: none"> <li>- Land preparation/nursery/planting/soil conservation/</li> <li>- Pest &amp; Disease/weeding/fertiliser application/harvesting</li> <li>- Managing difficult soils/crop forecast</li> </ul> <p>b) Sustainability Management Procedure Manual 1/8/13 revised in 19 May 2020:- To revised Steep land management, Riparia Buffer Zone, Complaints and Grievances, Legal requirement register, Supply chain and procedure New planting.</p> <p>c) OSH Manual dated 1/1/2010.</p> <p>d) Environmental Control Procedure – 01/9/2018</p> <p>e) Store Operating Manual – 2014</p> <p>f) Standard Operating Procedure Malaysia Estates rev 2 Dec10 rev 3 Oct 13.</p> <p>g) Jobs description - 2012</p> <p>The soil fertility and yield enhancement are described in details in the Oil Palm Manual under the following sections</p> <ul style="list-style-type: none"> <li>a) OPM No 7. Manuring of oil palm</li> <li>b) OPM no 13. Managing difficult soils</li> </ul> <p>Another SOP was from Group Plantation Advisory (Standard Operation Procedure: Buffalo Assisted Carrier establish on May 2013</p>	<p>Complied</p>

<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place.          - Minor Compliance -</p>	<p>The mechanisms to check the implementation of procedures were made among others through;</p> <ul style="list-style-type: none"> <li>a) internal audit, safety and health meeting</li> <li>b) Routine inspection (workplace inspection) by Assist Manager, staff and hospital assistant.</li> <li>c) Inspection and advisory visits by Sustainability and Safety department from HQ/Regional Office</li> </ul> <p>Sampling on Agronomist Visit, last on 12 April-13 April 2019. As per report verification the completion implementation of fertiliser recommendation done for 2019 was 73%.          Another sampling was internal audit conducted on 25 Sept 2019 by Audit department from HQ.</p> <p>Audiometric test report done periodically, the record available for review. Conducted by DAB OH Sdn Bhd (HQ/10/DOC/00/167). The result recorded 2 hearing impairment and no Standard threshold. In Sabapalm POM, the Audiometric test conducted on 22/3/2019. License for competent person for confined space as per below:-</p> <ul style="list-style-type: none"> <li>a). Authorized Gas Tester was available AGT014459 valid until 20/9/2020. However found health declaration for enter confined space was not been conducted by management (as per Industry Code of Practice for safe working in a confined space 2010; under 11.4 the authorised entrant shall declare that he is fit to enter the confined space in writing prior to each entry) Verified as per PTW dated 4/5/2019 and 2/5/2019.</li> </ul> <p>However sighted harvester (Workers id: E11280, E11276 &amp; E11307) was not been provide the safety shoe according to Standard Operating Procedure (SOP) revision 3 dated 11 Oct 2013. As per OSH manual (OM-GPB-12) Rev 00 dated 27/8/2015 stated PPE will be giver during workers start their work.</p>	<p>Non-compliance</p>
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		<p>E11276: start working on 25/5/2019 E11280: start working on 10/7/2019 E11307: start working on Jan 2019</p> <p>For below workers their last issue on safety shoes was on Sept 2018:- E11039, E11039, E10178</p> <p>GSPE and GSOM have not been able to demonstrate that Standard Operating Procedures are consistently implemented.</p> <ol style="list-style-type: none"> <li>1. Section 6.8.2 Procedure of Social Management (Doc. No. SMP-GPB-32, Rev. 00 dated 18 Jan 2018 states that Workers Committee Meetings shall be conducted at least quarterly or whenever necessary. However, records show that the Workers' Committee Meetings were held as follows:             <ul style="list-style-type: none"> <li>o At GSPE: 18 June 2019 and 14 Feb 2020.</li> <li>o At GSOM: 6 March 2020 and 8 Oct 2019.</li> </ul> </li> <li>2. Clause 3 (ii) of SOP Revision 3 dated 11 October 2013 - <i>Langkah-Langkah Perlu Dipatuhi di Kawasan Perumahan, Pusat Asuhan Kanak-Kanak dan Sekolah</i> effective Januari 2011 states that all animal coups ("pondok binatang") must be at least 50 meters away from the housing. At the linesite in Bangkawat Division and Kpg Bahagia 1, chicken coups were placed approximately 10m to 15m from the workers' houses. In addition, housing inspection reports have identified the issue of chicken coups locations in weekly inspection reports dated 7 Feb 2020, 11 Feb 2020, 20 April 2020, 18 May 2020, 4 June 2020, 22 June 2020.</li> </ol>	
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		<b>Therefore, a Minor Non-Compliance was issued.</b>	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	The monitoring of the SOP implementation was closely made by the all levels of the supervisory personnel with records maintained and Checked. Among others the records are;  a) Daily production/work records for the core activities at the estates/mill b) field cost book, c) chemical consumption record d) mature/immature field work program	Complied
<b>Criterion 3.4:</b> 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	<b>(C)</b> 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. - Critical (Major) compliance -	There is no new planting at Genting Sabapalm estate and mill. Therefore this indicator is not applicable.	Not Applicable
3.4.2	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. - Minor Compliance -	The Genting Sabapalm unit of certification has carried out a Social Impact Assessment & Human Rights Impact Assessment. The findings are contained in Report for Genting Sabapalm Estate and Genting Sabapalm Oil Mill 19th – 21st June 2019 3 <sup>rd</sup> revision. This report was prepared by the Sustainability Department dated August 2019. There is evidence that the SIA and Human Rights Impact Assessments were carried out with the participation of affected stakeholders as evidenced from pictorial evidence, report contents, and confirmed by stakeholders during audit interviews. Those consulted were both foreign and local workers, contractors,	Non-compliance

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		<p>villagers, and government officers. The findings were tabulated and contain both positive and negative comments.</p> <p>Among the positive comments include good relationship and continuous communications between the estate and mill with SK Tagas Tagas, supply of treated water during the draught season, patching of common road leading to the school, supply of water to the school and nearby villages, transparent FFB prices, clear border demarcation and no land disputes with the local community, and job opportunities to the nearby villagers.</p> <p>Among the negative comments include speeding motorists in front of the school, foreign workers refusing to go for medical check-ups during pregnancy, unsatisfactory attendance at HUMANA school, attendance not satisfactory, and issue of speeding motorists in front of school.</p> <p>The SIA has also identified the issue of undocumented dependants among estate and mill foreign workers, and foreign workers' lack of understanding of the process/procedure for applying birth certificates for foreign children. Among the action plan identified include providing clear information to the workers' representatives on the procedures of registering foreign workers' dependants.</p> <p><b>Therefore, a Minor Non-Compliance was issued.</b></p>	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.          - Critical (Major) compliance -</p>	<p>The Social Impact Assessment &amp; Human Rights Impact Assessment and the findings are contained in Report for Genting Sabapalm Estate and Genting Sabapalm Oil Mill 19th – 21st June 2019 3rd revision. This report was prepared by the Sustainability Department dated August 2019 and as of the date of this audit, is not yet due for an update. Management is planning for an update by August 2021.</p>	Complied

<b>Criterion 3.5:</b> A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>The existing procedure Doc No. GEN-13 Rev 01 Issue Date 2017 entitled Procedural Instruction Foreign Workers Employment, Payment and Recoverable only covers procedures for employment and selection of foreign workers. GSPE and GSOM therefore could not demonstrate the availability of documented procedures for</p> <ul style="list-style-type: none"> <li>- Recruitment and selection of local workers; and</li> <li>- Promotion of foreign and local workers.</li> </ul> <p>Issues related to retirement and/or termination, is provided for in the employment contracts (for foreign workers) and letter of appointment (for local workers), and these are made available to the workers. Sighted was letter of appointment dated 25 Sept 2015.</p> <p>Therefore, a Minor Non-Compliance was issued.</p>	<p>Non-compliance</p>
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Employment procedures are implemented and records duly maintained. This was based on the employment files sighted which contain employment contracts, personal details of the employees, copies of their passports, IC, and passport retention approval. Sighted during the audit were files of the following workers:</p> <p><u>GSPE:</u></p> <p>Worker Nos. E11280 employment contract dated 10 July 2019            Worker No. E11313 employment contract dated 25 May 2019            Worker No. E11285 employment contract dated 2 Aug 2019            Worker No. E10155 employment contract dated 17 April 2017            Worker No. E11140 employment contract dated 2 Jan 2018</p>	<p>Complied</p>

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		<p><u>GSOM:</u></p> <p>Workers No. E00285 employment contract dated 3 Dec 2019</p> <p>Worker No: E00214 employment contract dated 3 Dec 2019</p> <p>Worker No: E00288 employment contract dated 3 Dec 2019</p> <p>Worker No: E00170 dated employment contract 3 Dec 2019</p> <p>Worker No: E00254 employment contract dated 3 Dec 2019</p> <p>Worker No. E00306 employment contract dated 3 Dec 2019</p>									
<b>Criterion 3.6:</b> An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.											
3.6.1	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The risk assessment for chemical (CHRA) already been conducted by QMSPRO Snd Bhd (HQ/07/ASS/00/236) on 31 Oct 2019 and some amended on 30 Jan 2020 (HQ/03/ASS/00/154) for G-Planter Sdn Bhd.</p> <p>For all operation in estate, the risk and hazard already been assess and recorded under HIRARC. Latest was done on August 2019 on Harvesting area. No new activity in estate the assessment was updated accordingly.</p>	Complied								
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The Safety &amp; Health Management plan available for year 2020 in Sabapalm estate. The monitoring was done by management as per document no. 1101. Monitoring record showed:-</p> <table border="1" style="width: 100%;"> <thead> <tr> <th>Dated</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>13 Jan 2020</td> <td>Medical surveillance</td> </tr> <tr> <td>28 Feb 2020</td> <td>Workplace Inspection</td> </tr> <tr> <td>March 2020</td> <td>Audiometric test</td> </tr> </tbody> </table>	Dated	Remarks	13 Jan 2020	Medical surveillance	28 Feb 2020	Workplace Inspection	March 2020	Audiometric test	Complied
Dated	Remarks										
13 Jan 2020	Medical surveillance										
28 Feb 2020	Workplace Inspection										
March 2020	Audiometric test										

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		As per incident report JKKP 8(JKKP 8/43086/2019) dated 7/1/2020, 6 incident recorded.																											
<b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.																													
3.7.1	<p><b>(C)</b> 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&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	In Sabapalm estate, the staff and workers training need analysis was conducted to determined type of training needed. The record dated 7 Jan 2020 analysis was include sprayer, harvester and manuring.	Complied																										
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The training record as per below:-</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Date</th> <th>Training</th> </tr> </thead> <tbody> <tr> <td>Estate</td> <td></td> </tr> <tr> <td>11/3/2020</td> <td>Training on HIRARC, PPE, premix SOP and Buffer zone to contractor</td> </tr> <tr> <td>4/2/2020</td> <td>Training for sprayer in mature and immature.</td> </tr> <tr> <td>2/6/2020</td> <td>Spill kit training</td> </tr> <tr> <td>13/2/2020</td> <td>Manuring training</td> </tr> <tr> <td>9/4/2020</td> <td>ERP training</td> </tr> <tr> <td>23/3/2020</td> <td>Harvesting training</td> </tr> <tr> <td>7/5/2020</td> <td>Grading FFB training</td> </tr> <tr> <td>19/3/2020</td> <td>Water treatment training</td> </tr> <tr> <td>Mill</td> <td></td> </tr> <tr> <td>18/11/2019</td> <td>Handling of Tools &amp; equipment/PTW Training</td> </tr> <tr> <td>1/11/2019</td> <td>Training Fire Drill, Fire hydrant and First aid</td> </tr> </tbody> </table>	Date	Training	Estate		11/3/2020	Training on HIRARC, PPE, premix SOP and Buffer zone to contractor	4/2/2020	Training for sprayer in mature and immature.	2/6/2020	Spill kit training	13/2/2020	Manuring training	9/4/2020	ERP training	23/3/2020	Harvesting training	7/5/2020	Grading FFB training	19/3/2020	Water treatment training	Mill		18/11/2019	Handling of Tools & equipment/PTW Training	1/11/2019	Training Fire Drill, Fire hydrant and First aid	Complied
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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>There was a training on traceability and supply chain conducted on 3/7/2020 by the Genting’s sustainability department. The training was attended by 10 key personnel such as the mill manager, mill engineer, admin clerks and weighbridge operators.</p>	Complied														
<p><b>Criterion 3.8:</b> Supply chain requirement for mills          (note: All supply chain requirements are considered as <b>Critical (C)</b>. 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&amp;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</p>	NA	Not Applicable														

	without physically separating them, then only Mass Balance Module is applicable.		
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	Genting Sabapalm Oil Mill receives and process both certified and noncertified FFB (Own estate -75% and outsider (25%)). Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO Certified Products.	Complied
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.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in Table 10 of this public summary report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Based on verification of transaction records extracted from RSPO Palmtrace, the registration and reporting requirements found to be met.	Complied
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> <ol style="list-style-type: none"> <li>Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ol>	<p>Supply Chain and Traceability (Mill) Procedure, Doc. No. SMP-GPB-23 dated March 2020 has been established to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. Besides, procedures that are relevant were developed as below:</p> <ul style="list-style-type: none"> <li>- Incoming Inspection (Direct Material), Doc. No. PM-PRD-04 dated 2/1/2018</li> <li>- Product Identification &amp; Traceability, Doc. No. PM-PRD-01 dated 2/1/2018</li> <li>- Handling, Storage, Preservation and Delivery, Doc. No. PM-</li> </ul>	Complied

	<p>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.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>LAB-03 dated 2/1/2018</p> <ul style="list-style-type: none"> <li>- Internal Audit, Doc. No. SMP-GPB-03, Rev. 04 dated 25/5/2018</li> <li>- Management Review, Doc. No. SMP-GPB-06, Rev 01 dated 25/5/2018/2018</li> <li>- Production Planning &amp; Scheduling, Doc. No. PM-PRD- 03 dated 2/1/2018</li> </ul> <p>The Mill Manager to appoint responsible employees to implement and maintain the Supply Chain and Traceability System. Office Clerk has been appointed as the person-in-charge for Supply Chain, Traceability and Mass Balance requirements of RSPO, ISCC and MSPO Sustainability Standards. Interview with the PIC showed that she was able to demonstrate the implementation of their procedures in accordance to the standard.</p>	
<p>3.8.6</p>	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <ul style="list-style-type: none"> <li>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b. Effectively implements and maintains the standard requirements within its organisation.</li> </ul> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Genting has developed Sustainability Internal Audit, Doc. No.: SMP-GPB-03, Rev. 04 dated 25/5/2018 for conducting RSPO SCCS and RSPO Rules on Market Communications and Claims internal audit.</p> <p>The last internal audit was carried out on 21/5/2020 by an internal auditor sourced from Genting's office in Sandakan. The coverage of internal audit has included the General Chain of Custody Requirements for the Supply Chain and Mass Balance module. There was no non-conformity raised as a result of the internal audit.</p>	<p>Complied</p>
<p>3.8.7</p>	<p>Purchasing and Goods In</p>	<p>The accompanying documents of incoming FFB from own estate are estate's weighing bridge tickets which has the info about name</p>	<p>Complied</p>

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	<ul style="list-style-type: none"> <li>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul>	<p>of estate, RSPO certificate number, weighbridge ticket number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate's ticket number is recorded in the mill's ticket number.</p> <p>There has been no projected overproduction. Nonetheless, based on interview with the staff, the facility is aware of this requirement. The mechanism for handling non-conforming oil palm products and/or documents is addressed under Control of Non-conforming Product [PM-PRD-05, rev. 0, dated 2/1/2018] which describes the non-certified material or product shall be kept segregated from the certified ones.</p>	
<p>3.8.8</p>	<p><b>Sales and Goods Out</b></p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> </ul>	<p>All the information required by the standard was available in various shipping documents such as transporter's delivery order, mill's weighbridge, buyer's receiving notes, to name a few. The following contracts were verified:</p> <ul style="list-style-type: none"> <li>i) SSD/0520/S03PK, dated 20/5/2020, commodity: RSPO MB Palm Kernel</li> <li>ii) SSD/0620/S03CPO, dated 23/6/2020, commodity: CPO RSPO MB</li> </ul>	<p>Complied</p>

	i) A unique identification number.		
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>The company has outsourced the transportation for CPO and PK delivery to third parties and own company transporter. Transporter Agreements were verified as below:</p> <p>i) Landasan Kembar Sdn Bhd valid from 1/6/2018 to 31/5/2021 for CPO and PK.</p> <p>ii) Juita Baru Sdn Bhd valid from 1/6/2018 to 31/5/2021 for CPO and PK.</p> <p>Requirement to adhere to RSPO supply chain standard is clearly defined in the agreement and the contractors have acknowledged on the requirements to be complied. There was a briefing of the RSPO SCCS requirements to the PK and CPO transporters on 25/2/2019 and attendance list was sighted.</p>	Complied
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	NA as process is not done by any outsourced contractors.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	NA as process is not done by any outsourced contractors.	Complied

<p>3.8.12</p>	<p>Record keeping</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>iv) For Mass Balance Module, the mill:             <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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).</li> </ul> </li> </ul>	<p>Sabapalm Oil Mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p> <p>Sampled records of FFB weighbridge tickets, daily production records and mass balance accounting for last 2 years were still in place for verification.</p> <p>The facility opted for three monthly basis record and balance. Excel format is used for the mass balance calculation. Among the information available in the format is month, FFB processed, OER, CPO amount [opening, produced and closing], dispatch of CPO &amp; PK and balance of CPO &amp; PK both in virtual and physical.</p> <p><u>CPO:</u>          RSPO certified CPO produced in Mar 19-Jun 20 = 24,840.51 mt          RSPO certified CPO sold as RSPO certified in in Mar 19-Jun 20 = 2,898.89 mt          RSPO certified CPO sold as ISCC certified in Mar 19-Jun 20 = 20,844.10 mt          RSPO certified CPO sold as conventional in Mar 19-Jun 20 = 9,809.47 mt          Balance of RSPO certified CPO = -8,711.95 mt</p> <p><u>PK:</u>          RSPO certified PK produced in Mar 19-Jun 20 = 4,659.78 mt          RSPO certified PK sold as RSPO certified in in Mar 19-Jun 20 = 3,075.76 mt          RSPO certified PK sold as conventional in Mar 19-Jun 20 = 3,073.67 mt          Balance of RSPO certified PK = -1,489.65 mt</p>	<p>Complied</p>
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		There were several occasions that the facility had sold short of its products. Based on verification of the mass balance accounting, movements, the short sales were adequately recovered within three-month period.	
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>	NA. Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER can be seen in Table 10 of this report.	Not Applicable
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	NA. Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER & KER can be seen in Table 10 of this report. Thus, periodic update is not necessary.	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>	NA. The facility opted for mass balance model.	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> <p>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.</p>	The actor is a palm oil mill and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. Based on the downloaded transactions register from the certification unit's PalmTrace, the company was able to demonstrate that it has been registering its transactions in the PalmTrace accordingly. Since the last assessment there were 33 announcements made.	Complied

3.8.17	<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>	<p>RSPO trademark was not in use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied
<b>General corporate communications</b>			
4.1	<p>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.</p>	<p>Genting Sabapalm Oil Mill does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>a. Display its RSPO membership status</li> <li>b. Display the RSPO web address (www.rspo.org)</li> <li>c. State that the member supports the work of the RSPO</li> <li>d. State the member's history with regard to the RSPO.</li> <li>e. Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> <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>	<p>Genting Sabapalm Oil Mill does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.</p>	Complied
4.3	<p>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.</p>	<p>Genting Sabapalm Oil Mill does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.</p>	Complied
4.4	<p>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.</p>	<p>Genting Sabapalm Oil Mill does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.</p>	Complied



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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 Sabapalm Oil Mill does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.	Complied
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. No claims have been made.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Verification of shipping documents such as weighbridge tickets and delivery orders showed that the requirements of RSPO SCCS were adhered which included the information about certificate number stated.	Complied
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Genting Sabapalm Oil Mill is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
<b>Business to consumer communication</b>			

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6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	No business to consumer communication on product specific claim made by Genting Sabapalm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	No business to consumer communication on product specific claim made by Genting Sabapalm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made by Genting Sabapalm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made by Genting Sabapalm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made by Genting Sabapalm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made by Genting Sabapalm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made by Genting Sabapalm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use	No business to consumer communication on product specific claim made by Genting Sabapalm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable

	<p>of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a>.</p>		
<p><b>MODULE B – MASS BALANCE SPECIFIC RULES</b></p>			
<p><b>Minimum Mass Balance content</b></p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>Based on the excel sheet mass balance accounting of the mill, production of certified products was calculated correctly according to fractions of FFB received from both certified and non-certified suppliers. Therefore, 100% of certified oil palm content in the products can be achieved.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>Based on the excel sheet mass balance accounting of the mill, production of certified products was calculated correctly according to fractions of FFB received from both certified and non-certified suppliers. Therefore, 100% of certified oil palm content in the products can be achieved.</p>	<p>Complied</p>
<p><b>Labelling and trademark (MB)</b></p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>• 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</li> </ul>	<p>Genting Sabapalm Oil Mill is producing crude palm products and does not involve in any labelling of end product.</p>	<p>Complied</p>

	<p>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.</p> <ul style="list-style-type: none"> <li>• The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>• 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).</li> <li>• 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 &amp; Claims document.</li> </ul>		
<b>Messaging (MB)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>• [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.</li> <li>• 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.</li> </ul> <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>	<p>Genting Sabapalm Oil Mill is producing crude palm products and does not involve in any labelling of end product.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> <li>Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</li> </ul>		
<b>Principle 4: Respect community and human rights and deliver benefits</b>			
<b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p><b>(C)</b> 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>Both GSPE and GSOM subscribe to the Genting Plantations Berhad’s Social Policy dated 22 June 2015. However, this Policy does not contain:</p> <ul style="list-style-type: none"> <li>A provision that prohibits retaliation against Human Rights Defenders;</li> <li>A provision that prohibit intimidation and harassment by unit of certification and contracted services including contracted security forces.</li> </ul> <p>Consequently, GSPE and GSOM could not demonstrate that the above requirements have been documented and communicated to all levels of workforce, operations, supply chain and local communities.</p> <p>Therefore, a Major Non-Compliance was issued.</p>	Non-compliance
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>Based on documents, field observations and interviews conducted with workers (local and foreign, harvesters, general workers, mill workers, security personnel including auxiliary police), contractors and suppliers, and local communities from Kg Tagas-Tagas that there is no evidence that the Sabapalm Oil Mill and its supply base have instigated any violence or use any form of harassment in their operations.</p>	Complied
<b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring</p>	<p>A complaints and grievance procedure is available and is contained in Doc No. SMP-GPB-19 Rev 04 issue date March 2020. This</p>	Complied

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	<p>anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>procedure was briefed and mutually agreed by stakeholders during stakeholder meeting held on 10 March 2020. The Procedure states that written complaints can be done anonymously via post, email, SMS or complainants and suggestion box, or through appointed representatives, and that all written complaints will be treated confidentially. The Policy also states that the time frame for resolving the complaint would depend on the seriousness of the said grievance or complaint, and that the accepted timeframe to respond is within one month of receipt of the complaint or grievance.</p> <p>Additional protection for complainants is also available in the Whistleblower Policy dated 1 June 2020.</p>	
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 procedure practised is for the management to explain to all affected parties in a clear and easy to understand manner, include flowcharts and explanations in both in English and Bahasa Malaysia. Briefing on the procedure was given also during stakeholder meeting on 10 March 2020 where stakeholders were informed of where the complaints form could be found throughout the Estate and Mill premises. (i.e. at Warung Makan Aling, GPSE office, and Nuryani shop).</p> <p>No illiteracy among the sampled workers were found during the audit. However, the procedure in place would be to seek assistance from someone who could explain to the illiterate workers to ensure understanding.</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 Genting Sabapalm certification unit is able to demonstrate that parties to a grievance are were kept informed of the progress and outcome of the grievance. Sighted at GSOM was a letter of complaint dated 22 Feb 2020 received from Majlis Pengurusan Komuniti Kampong, Kampong Bambang Telupid related to dangerous speeding of FFB lorries and CPO tankers along the main</p>	Complied

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		road. GSOM kept the complainant informed of the progress in a written response dated 29 Feb 2020, enclosing copies of WhatsApp messages sent by GSOM to transporters to reduce the lorry speed.	
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	Paragraph 2.1.10 of Doc No. SMP-GPB-19 Rev 04 issue date March 2020 include provisions allowing parties to a grievance or dispute to have access to independent legal and technical advice and third-party mediator.	Complied
<b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Evidence is available that contributions to community development are based on consultation with the local community. Among the contributions were: <ul style="list-style-type: none"> <li>- Letter dated 3 March 2020 from Manager of Styland Estate (neighbouring estate) requesting for potable water for its workers during the drought season;</li> <li>- Letter dated 25 June 2020 from Kg Lumantik for supply of potable water;</li> <li>- Letter dated 13 Jan 2020 from the Headmaster of SK Ladang Sabapalm requesting to replace tables and chairs which were already old and unsafe. Sabapalm Estate replied on 15 June 2020 agreeing to provide 30 chairs and 6 cans of paint;</li> <li>- Provide general maintenance and repair services to SK Ladang Sabapalm;</li> <li>- Providing free electricity and treated water to SK Ladang Sabapalm;</li> <li>- Providing estate accommodation to 7 teachers from SK Ladang Sabapalm;</li> <li>- Providing job opportunities to the local community.</li> </ul>	Complied

<b>Criterion 4.4:</b> 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.																						
<p>4.4.1</p>	<p><b>(C)</b> 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 lease documents. Sampled during the audit were the following documents:</p> <p>Issuance of leases by the Director of Land and Surveys was done on behalf of the Government of Sabah to Sabah Devt Co Sdn Bhd specified for the purpose of oil palm cultivation as follows:</p> <table border="1" data-bbox="1243 667 1870 1098"> <thead> <tr> <th>Title Lease</th> <th>No.</th> <th>Hectarage</th> <th>Period of lease</th> </tr> </thead> <tbody> <tr> <td>08510997</td> <td></td> <td>2118.12</td> <td>999 years from 10.07.1888 – 10.07.2887</td> </tr> <tr> <td>08510996</td> <td></td> <td>1957.46</td> <td>999 years from 10.07.1888 – 10.07.2887</td> </tr> <tr> <td>085319231</td> <td></td> <td>283</td> <td>98 years from 01.01.1987 – 31.12.2085</td> </tr> <tr> <td>Total hectarage</td> <td></td> <td>4358.58</td> <td></td> </tr> </tbody> </table> <p>The GSOM has a total area of 13.62 ha comprising mill site, labour quarters, and ponds, all of which are located within the GSPE lease title no 085319231.</p>	Title Lease	No.	Hectarage	Period of lease	08510997		2118.12	999 years from 10.07.1888 – 10.07.2887	08510996		1957.46	999 years from 10.07.1888 – 10.07.2887	085319231		283	98 years from 01.01.1987 – 31.12.2085	Total hectarage		4358.58	
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<p>4.4.2</p>	<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 and milling activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities, there is no evidence of any legal, customary or user rights of other users on</p>																				



		GSPE or GSOM. Therefore, no agreement-making process and negotiated agreements detailing FPIC process is necessary and available.	
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	The land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities, there is no evidence of any legal, customary or user rights of other users on GSPE and GSOM. Therefore, no agreement-making process and negotiated agreements detailing FPIC process is necessary and available.	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 land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities, there is no evidence of any legal, customary or user rights of other users on GSPE and GSOM. Therefore, no agreement-making process and negotiated agreements detailing FPIC process is necessary and available.	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 land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities, there is no evidence of any legal, customary or user rights of other users on GSPE and GSOM. Therefore, no agreement-making process and negotiated agreements detailing FPIC process is necessary and available.	Complied
4.4.3	<b>(C)</b> 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 land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities, there is no evidence of any legal, customary or user rights of other users on GSPE and GSOM. Therefore, no maps of an appropriate scale	Complied

		showing extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties is necessary and available.	
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 land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities, there is no evidence of any legal, customary or user rights of other users on GSPE and GSOM. Therefore, no assessment of impacts, proposed benefits sharing and legal agreements is necessary and available.	Complied
4.4.5	<b>(C)</b> 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 land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities, there is no evidence of any legal, customary or user rights of other users on GSPE and GSOM. Therefore, no representations through institutions or representatives of their own choosing or legal counsel is necessary and available.	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 land for carrying out oil palm plantation and milling activities have been made within the area on its valid legal titles. Based on documentation review, interviews with local communities, there is no evidence of any legal, customary or user rights of other users on GSPE and GSOM. Therefore, no negotiated agreements through FPIC process is necessary and available for annual review.	Complied
<b>Criterion 4.5:</b> 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	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	There is no evidence of any new planting within any of the Genting Sabapalm certification unit and therefore this indicator is not applicable.	Not Applicable

4.5.2	<p><b>(C)</b> 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>There is no evidence of any new planting within any of the Genting Sabapalm certification unit and therefore this indicator is not applicable.</p>	<p>Not Applicable</p>
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>There is no evidence of any new planting within any of the Genting Sabapalm certification unit and therefore this indicator is not applicable.</p>	<p>Not Applicable</p>
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>There is no evidence of any new planting within any of the Genting Sabapalm certification unit and therefore this indicator is not applicable.</p>	<p>Not Applicable</p>
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>There is no evidence of any new planting within any of the Genting Sabapalm certification unit and therefore this indicator is not applicable.</p>	<p>Not Applicable</p>

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 -	There is no evidence of any new planting within any of the Genting Sabapalm certification unit and therefore this indicator is not applicable.	Not Applicable
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 -	There is no evidence of any new planting within any of the Genting Sabapalm certification unit and therefore this indicator is not applicable.	Not Applicable
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no evidence of any new planting within any of the Genting Sabapalm certification unit and therefore this indicator is not applicable.	Not Applicable
<b>Criterion 4.6:</b> Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	The procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation is in place. This is evident from document entitled Procedure on Conflict Resolution and Handling of Negotiations and Compensations Document No. SMP-GPB-18; Rev. No. 03, issued on 29 Dec 2017.	Complied
4.6.2	<b>(C)</b> 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 for calculating and identifying legal, customary or user rights, and for distributing fair and gender-equal compensation is in place as evident under document entitled Conflict Resolution and Handling of Negotiations and Compensations Document No. SMP-GPB-18; Rev. No. 03, issued on 29 Dec 2017. As of the date of this audit, there has been no evidence of any compensation paid to any party. Therefore, its implementation, evaluation and corrective actions taken could not be verified.	Complied

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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 -	Smallholding units are held by smallholders via family landholdings. The Genting Sabapalm certification unit does not have any say in allocating land titles to any party, and therefore this indicator is not applicable.	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 -	There has been no evidence of negotiated agreements, compensation and payments made and therefore the efficacy of the procedure could not be verified during this audit.	Complied
<b>Criterion 4.7:</b> 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	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	The procedure for identifying people entitled to compensation is in place as evidenced by the document entitled Conflict Resolution and Handling of Negotiations and Compensations Within GENP Estates; Doc. No. SMP-GPB-18; Rev. No. 03 issued on 29 December 2017.	Complied
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -	The procedure for calculating and identifying legal, customary or user rights, and for distributing fair and gender-equal compensation is in place as evident under document entitled Conflict Resolution and Handling of Negotiations and Compensations Document No. SMP-GPB-18; Rev. No. 03, issued on 29 Dec 2017. This document is available for review by stakeholders.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	As of the date of this audit, there is no evidence of any communities who have lost access and rights to land for plantation expansion of any of the units within the Genting Sabapalm certification unit.  Therefore, this Indicator is not applicable.	Not Applicable
<b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			

4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	As of the date of this audit, there is no evidence of any land dispute. This was also confirmed during audit interviews with the local community from Kg Tagas Tagas.	Not Applicable
4.8.2	<b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	As of the date of this audit, there is no evidence of any land dispute. This was also confirmed during audit interviews with the local community from Kg Tagas Tagas.	Not Applicable
4.8.3	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) - Minor compliance -	As of the date of this audit, there is no evidence of any land dispute. This was also confirmed during audit interviews with the local community from Kg Tagas Tagas.	Not Applicable
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	As of the date of this audit, there is no evidence of any land dispute. This was also confirmed during audit interviews with the local community from Kg Tagas Tagas.	Not Applicable
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			

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5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous period prices paid for FFB are available in the agreement between the company and the smallholders. It is also publicly available upon request.	Complied
5.1.2	<b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Mechanism of pricing is spelt out in Genting's " <i>Polisi Perolehan Tandan Buah Sawit (TBS)</i> " (External FFB Procurement Policy Agreement). Explained by the Marketing Palm Product Manager (Mr. Chia Choon How) to the FFB suppliers through a meeting which was conducted on 6/7/2017 [ref.: minutes of meeting]. After the date, the policy agreement is signed by both parties (Genting & FFB supplier) individually.	Complied
5.1.3	<b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Based on interview, smallholders are satisfied with the calculation formula documented in the agreement.	Complied
5.1.4	<b>(C)</b> 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. - Critical (Major) compliance -	Genting is offering a credit facility for purchasing of fertilisers to the smallholders supplying FFB to Sabapalm mill. The repayment is done through deduction of FFB sales payment. There is an agreement for this transaction, however the terms of repayment can be further improved by providing clearer details especially with regards to schedule of repayment. In the terms, it was only stated, " <i>Pemotongan akan dibuat selepas baja tersebut sampai ke store walaupun pekebun kecil belum mengambil dari store</i> " (Deduction will be made after the fertilisers have been delivered at the store, although the debtors have yet taken them) (OFI).	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Contracts between the third party FFB suppliers and Genting were signed by both parties. Based on interview with the sampled suppliers, there was no issue raised related to fair contract.	Complied
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Based on sampled transaction [ref.: #519802870100292], the payment was made on 11/6/2020 for FFB sales made in May 2020.	Complied

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	- Critical (Major) compliance -	This is in-line with the agreement i.e. "not later than 12 <sup>th</sup> of every subsequent month".	
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 -	GSPOM has two units of weighbridge i.e. serial number 162150256 and 113650108. Both equipment has been last calibrated by a third-party metrology company on 15/7/2019 [receipt no.: B1503734 and B1503733] under Weights and Measures Act 1981, Regulations 16, 28A dan 45.	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Currently, there are some MSPO certified smallholders who send their FFB to GSPOM. None of them is RSPO certified. Nonetheless, the CU has encouraged them to go for certification during stakeholder consultation meeting.	Complied
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	The grievance mechanism for smallholders is guided by Genting's grievance procedure which details described in Criterion 4.2. So far there was no grievance raised from the smallholders.	Complied
<b>Criterion 5.2:</b> 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 -	Although the certification unit had conducted a stakeholders meeting which includes the smallholders supplying FFB to the mill, the unit has yet to assess the needs for support to improve the their livelihoods and their interest in RSPO certification. See NCR under Indicator 5.2.2.	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).	There is no evidence that the livelihood improvement programmes for smallholders supplying FFB has been developed by the certification unit. Thus, a non-conformity report was assigned due to this lapse.	Non-compliance



	- Minor compliance -		
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	It is yet to know whether or not this indicator is applicable as assessment under Indicator 5.2.1 has yet to be conducted. See NCR under Indicator 5.2.2.	Not Applicable
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Not applicable as no scheme smallholders associated with the certification unit.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Not applicable as assessment under Indicator 5.2.1 has yet to be conducted. See NCR under Indicator 5.2.2.	Not Applicable
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> 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 -	Both GSPE and GSOM subscribe to Genting Plantations Berhad's Social Policy signed by President/Chief Operating Officer dated 22 June 2015 and People Policy dated 3 August 2009 which states the Group's commitment to not discriminate in terms of hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, union membership or political affiliation.  The People Policy dated 3 August 2009 also states that no one shall be denied their rights to equal opportunities. These Policies are publicly displayed at all main notice boards within the premises.  Interviews conducted with workers also confirmed that there is no form of discrimination practiced within GSPE and GSOM.	Complied

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6.1.2	<p><b>(C)</b> 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.</p> <p>- Critical (Major) compliance -</p>	<p>Observations made and confirmed during interviews held with local and foreign workers (men and women) confirmed that no incidence of discrimination in any form (racial, gender, caste, national origin, marital status, etc) is present within the GSPE and GSOM.</p> <p>Sighted during the audit was the agreement between Genting Plantation Berhad (GPB) and Agensi Pekerjaan MNK Sdn Bhd &amp; its partner in Indonesia, P.T. Primadaya Patama Pandukarya dated 1 Oct 2019. This Agreement is valid until 30 Sept 2020 and states that GPB shall pay the agent RM2600 per worker as payment for recruitment services (recruitment fees). Indonesian migrant workers who were employed via recruitment agents also confirmed that they have not been charged any recruitment fee.</p>	Complied
6.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>The Genting Sabapalm certification unit is able to demonstrate that recruitment selection and hiring as well as access to training and promotion are based on skills, capabilities, and medical fitness.</p> <p>Sighted during the audit was the hiring of a Potential Auxiliary Police (AP) who was appraised for his suitability as an AP. He was also appraised for suitability to attend training at the Pusat Latihan Polis (PULPOL). The reviews were conducted on 30 Nov 2018 and 4 Dec 2019. His appointment as AP was made after being issued with Basic Certificate Auxiliary Police No. PB98598 by the Pusat Latihan Polis Sabah on 18 December 2019.</p>	Complied
6.1.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Interview with HA and Gender Committee confirmed that no discriminatory pregnancy test is being carried out. This was confirmed during interviews carried out with Employee No: 80001613 (admin staff) and worker Passport No. AT705497 (manuring worker), both have since given birth.</p> <p>For the manuring worker, once she was confirmed pregnant, the Klinik Sabapalm Health Assistant on 1 Dec 2019 immediately issued</p>	Complied

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		a Medical Removal Protection Record, signed by the Estate Health Assistant and advised to rest at home. The worker was interviewed during the audit and confirmed that she had voluntarily requested to rest at home once her pregnancy was confirmed as she did not want to endanger the baby.	
6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	A Gender Committee is in place at both GSPE and GSOM. Meetings for the committee members were held at GSPE on 12 July 2019 and 18 Feb 2020. Among the topics discussed included blood donation campaign, Family Planning campaign, awareness that pregnant mothers are to register at nearest government clinic, pregnant mothers are to give birth at government hospital or clinic (as opposed to at home), that all costs related to the pregnancy and birth will be fully borne by the workers. At GSOM, the Gender Committee meetings were held on 20 Sept 2019 and 25 Feb 2020. Among the topics discussed were awareness of what constitutes sexual harassment, domestic and child abuses. The Gender Committee also raised concern that many workers' children do not have birth certificates. This issue was brought up and have been included in the GSPE's and GSOM's SIA Action Plan.	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	Genting Sabapalm certification unit is able to demonstrate that workers receive equal pay for the same work scope. Payslips and employment contracts of a male mandore (Worker No. E00813) and a female mandore (Worker No. 10988) show that they both receive the same amount of daily wage i.e. RM42.31 per day. Similarly, at the Mill, based on payslips sighted, male (Worker No. E00307) and female (Worker No. E00154) laboratory analysts receive the same daily rate of RM42.31.	Complied
<p><b>Criterion 6.2:</b> 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).</p>			

<p>6.2.1</p>	<p><b>(C)</b> 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.</p> <p>- Critical (Major) compliance -</p>	<p>Documentation of pay and conditions are available in employment contracts issued to all workers (local and foreigners). The employment contracts are prepared in Bahasa Malaysia which is the language all workers are familiar with. Documentation of pay is in the form of pay slips which are issued out to every employee at the end of the month. Both the employment contracts and payslips are available to the workers.</p> <p>The following workers' employment contracts and payslips (Oct 2019, January 2020 and June 2020) were sampled and verified. The employment contracts too were verified to be valid and current and signed by both GSPE and GSOM and their respective sampled workers:</p> <p><u>GSPE:</u></p> <p>Worker Nos. E11280 employment contract dated 10 July 2019          Worker No. E11313 employment contract dated 25 May 2019          Worker No. E11285 employment contract dated 2 Aug 2019          Worker No. E10155 employment contract dated 17 April 2017          Worker No. E11140 employment contract dated 2 Jan 2018</p> <p><u>GSOM:</u></p> <p>Workers No. E00285 employment contract dated 3 Dec 2019          Worker No: E00214 employment contract dated 3 Dec 2019          Worker No: E00288 employment contract dated 3 Dec 2019</p>	<p>Complied</p>
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		<p>Worker No: E00170 dated employment contract 3 Dec 2019</p> <p>Worker No: E00254 employment contract dated 3 Dec 2019</p> <p>Worker No. E00306 employment contract dated 3 Dec 2019</p>	
<p>6.2.2</p>	<p><b>(C)</b> 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>Employment contracts Revised on 1 Dec 2019 were used. The same version is used for both foreign and local workers. The document is in Bahasa Malaysia which is the language all workers are familiar with. It contains clauses related to job description, duration of contract, probation period, (6 months for Malaysians and not applicable to foreign workers), retirement age, place of work, workers' obligations, wages, time and working hours, overtime, rest day, annual leave, public holidays, housing facilities, medical leave, maternity leave, insurance coverage, notice of termination, and reasons for termination.</p> <p>Payslips contain information that detail out payments such as period of wages, name, worker's number, IC/Passport, Geng, Job Position, breakdown if income received (monthly pay, overtime), employer's statutory contribution (SOCSO, EPF, SIP), and deductions (e.g. deductions), and acknowledgement by respective worker. Sampled payslips reviewed give accurate information on compensation for work done. None of the workers' was assisted by their family members.</p> <p>The following employment contracts and payslips (Oct 2019, Jan 2020 and June 2020) were sampled and verified during the audit:</p> <p><u>GSPE:</u></p> <p>Worker Nos. E11280 employment contract dated 10 July 2019</p> <p>Worker No. E11313 employment contract dated 25 May 2019</p>	<p>Complied</p>

		<p>Worker No. E11285 employment contract dated 2 Aug 2019          Worker No. E10155 employment contract dated 17 April 2017          Worker No. E11140 employment contract dated 2 Jan 2018</p> <p><u>GSOM:</u>          Workers No. E00285 employment contract dated 3 Dec 2019          Worker No: E00214 employment contract dated 3 Dec 2019          Worker No: E00288 employment contract dated 3 Dec 2019          Worker No: E00170 dated employment contract 3 Dec 2019          Worker No: E00254 employment contract dated 3 Dec 2019          Worker No. E00306 employment contract dated 3 Dec 2019</p>	
<p>6.2.3</p>	<p><b>(C)</b> 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.          - Critical (Major) compliance -</p>	<p>Except for the non-compliance detailed out below, GSPE and GSOM generally comply with the legal compliance related to working hours, sickness and holiday entitlement, maternity leave, and other legal labour requirements.          Should GSPE or GSOM decide to offer work on rest day, a memo would be issued offering work on rest day at double the normal rate. Overtime or work on rest day are voluntary. Sighted was a memo dated 7 July 2020 offering work on rest day which stated that pay rate would be double as per the Sabah Labour Ordinance. However, GSPE and GSOM were not able to demonstrate legal compliance for salary deductions and working more than 104 hours per month.          Salary deductions for the following GSPE workers were made without complying with the conditions under paragraph 2.2 of the Permit issued by the Sabah Labour Office dated 31 December 2019</p>	<p>Non-compliance</p>

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(Serial No. 600-1/2/8/229 (11/SDK/2019-0339). Paragraph 2.2. requires that a written consent from the workers to be obtained for the salary deductions.

Estate	Workers No	Month/Year	Travelling documents(RM)	Electricity (RM)
Sabapalm Estate	E10936	May 2020	-	8.35
	E00813	May 2020	-	51.50
	E10155	Jan 2020	200.00	-
	E00663	May 2020	-	14.74
	E10847	May 2020	-	10.98
	E00005	May 2020	-	18.32
	E11276	May 2020	-	50.00

Overtime for the following GSOM workers were carried out without complying with the conditions under paragraph 1.2 of the Permit issued by the Sabah Labour Office dated 18 May 2018 (Serial No. 600-1/2/13/9 (08/SDK/2018-0172). Paragraph 1.2 of the permit states that written consent from the worker is needed if they are required to do overtime exceeding 104 hours. However, for the following workers, no written consent was obtained:

Worker No	Maximum hours per month	Month/Year
E00011	106 hours	March 2020
E00027	112.5 hours	March 2020

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		<table border="1"> <tr> <td>E00230</td> <td>118.5 hours</td> <td>March 2020</td> </tr> <tr> <td>E00286</td> <td>111.5 hours</td> <td>June 2020</td> </tr> <tr> <td>E00294</td> <td>104.5 hours</td> <td>Oct 2019</td> </tr> <tr> <td>E00309</td> <td>105 hours</td> <td>Oct 2019</td> </tr> </table>	E00230	118.5 hours	March 2020	E00286	111.5 hours	June 2020	E00294	104.5 hours	Oct 2019	E00309	105 hours	Oct 2019	
E00230	118.5 hours	March 2020													
E00286	111.5 hours	June 2020													
E00294	104.5 hours	Oct 2019													
E00309	105 hours	Oct 2019													
		Therefore, a Major Non-Compliance was issued.													
6.2.4	<p><b>(C)</b> 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>GSPE and GSOM were able to demonstrate that adequate housing and sanitation facilities were provided for employees who live within the premises. Each house has 3 rooms, and occupied by between 3 to 5 workers. For houses which are connected to the Sabah Electricity Board (SEB) grid, the occupants receive subsidised electricity, and for those not connected receive free electricity. All houses receive free treated water. Among the facilities available include grocery shops, places of worship (<i>surau</i>, chapel and a Buddhist temple), football field, volleyball and badminton court, HUMANA school, creche, community hall, and free medical facilities at the estate clinic. A Visiting Medical Officer visits the estate clinic once a month. Weekly housing inspections are carried out by the Health Assistant. Records show the inspections carried out on 3 July 2020, 22 June 2020, 12 June 2020, 4 June 2020, 18 May 2020, 13 May 2020, 5 May 2020.</p> <p>The Housing Master Plan 2017 – 2021 have identified the repair, upgrade and replacement needs of existing houses. Budget is available as sighted in Summary of General Charges for Fiscal Year 2020, V01 (1 /1/2020 – 31/12/2020) where RM8295 is allocated per month (RM100,000 p/a).</p>	Complied												
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	Evidence is available that efforts were made to improve workers’ access to adequate, sufficient an affordable food. There are two grocery shops located within the GSPE and GSOM premises, namely,	Complied												



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	<p>- Minor compliance -</p>	<p>Warung Aling and Kedai Nuryani. Occasionally, outside traders are also allowed in to sell fresh vegetables and fish. Additionally, both grocery stores were required to list down the prices of items sold before their tender is renewed for the year. Sighted were price listings from Warung Aling and Kedai Nuryani dated 9 July 2020.</p>	
<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><b>PROCEDURAL NOTE:</b> 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</i></p>	<p>All sampled workers receive at least minimum wages. In addition, the certification unit also have carried out the calculation of prevailing wages and in-kind benefits. The calculation took into account housing costs, productivity incentives, price bonus, meals at work, food ration, transport to and from work, creche facilities, school for workers' children, health care, sports facilities, welfare.</p> <p>The prevailing wage calculated for both GSPE and GSOM were as follows:</p> <p>Harvesters: RM1974.58 per month; and for general workers: RM1704.02 per month.</p> <p>Based on the breakdown of the calculation, the prevailing wages calculated were fair and reasonable.</p>	<p>Complied</p>

	<p><i>all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• 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</li> <li>• 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.</li> </ul> <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>As evidenced from the checkroll list, all employees hired by GSPE and GSOM are full time employees. As of the date of this audit, there was no casual, temporary and day labour.</p>	Complied
<p><b>Criterion 6.3:</b> 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><b>(C)</b> 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>Genting Plantations Berhad’s People Policy dated 3 Aug 2009 states that the Company does not prohibit employees to join any trade union of their choice. Additionally, the Social Policy dated 22 June 2015 states allows freedom of association and the right to collective bargaining. These Policies were prepared in English and Bahasa Malaysia, displayed on main notice boards and explained to the</p>	Complied

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		workers as evidenced from the minutes of the Workers' Committee Meeting dated 14 Feb 2020.	
6.3.2	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. - Minor compliance -	Workers Welfare Committee meetings which comprise freely elected worker representatives from various ethnicity, were held twice a year at both GSPE (18 June 2019, 14 Feb 2020) and GSOM (8 Oct 2019 and 6 March 2020). The meetings were attended by workers' representatives from Klagan, Bangkawat, Sapi, Kwan Divisions where among others, management reiterated that workers are not prohibited from joining any trade unions, informed that any complaints can be made using the Complaints and Grievance Book placed at the office, and any complaints can be lodged also via email or sms.	Complied
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 -	GSPE and GSOM were able to demonstrate that worker representatives were elected at muster by the workers themselves, as they confirmed to the auditor during audit interview.	Complied
<b>Criterion 6.4: Children are not employed or exploited.</b>			
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 -	GSPE and GSOM subscribe to Genting Plantations Berhad's Social Policy dated 22 June 2015 and People Policy dated 3 Aug 2009 which states that the company does not employ any child labour.  All contracts entered into with third parties contain a clause which states that the contractor shall ensure no minors (below 18 years old) are employed. Sighted were contracts entered into with Syarikat Tan Hong Transport, Landasan Kembar Sdn Bhd and Juita Baru Sdn Bhd. Briefing on the same manner were also given during stakeholder meetings, verified via Stakeholder Meeting Minutes of 10 March 2020.	Complied

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6.4.2	<p><b>(C)</b> 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.</p> <p>- Critical (Major) compliance -</p>	Based on documentation review, interview of workers and field observations, evidence is available that minimum age requirements are met. This was further verified by looking at the checkroll list where records show that all workers employed are above 18 years old.	Complied
6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	Based on documentation review, interview of workers and field observations, no young persons are employed within the unit of certification.	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>	Communication of Genting Plantations Berhad's Social Policy dated 22 June 2015 and People Policy dated 3 Aug 2009 which state that the company does not employ any child labour was made during stakeholder meetings on 10 March 2020, Policy briefings to workers on 3 Feb 2020, and during induction trainings for new workers.	Complied
<p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> 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>	Genting Plantations Berhad has developed a Sexual Harassment Policy dated 3 Aug 2009 where the company commits to a harassment-free environment and avoid behaviour that may create an atmosphere of hostility and intimidation of any kind at the workplace. The policy has been briefed to all the workers during induction training, Policy training on 3 Feb 2020, muster briefings, Gender Committee meetings at GSPE (12 July 2019 & 18 Feb 2020) and at GSOM (20 Sept 2019 & 25 Feb 2020). Additionally, the GSPE Gender Committee also briefed the workers sexual harassment and other forms of harassment during muster briefing.	Complied
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p>	A Social Policy dated 22 June 2015 was developed in which the Genting Plantations Berhad commits to respect and protect reproductive rights. However, there is no evidence that any	Non-compliance

	- Critical (Major) compliance -	awareness or briefings on reproductive rights has been given to all levels of workforce both GSPE and GSOM. Therefore, a Major Non-Compliance was raised.	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -	Employee No: 80001613 is a new mother giving birth to her first child on 8 October 2019. Management of GSPE has not been able to demonstrate that the needs of this new mother has been assessed in consultation with her. Therefore, a Major Non-Compliance was raised.	Non-compliance
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	GSPE and GSOM subscribe to the Genting Plantations Berhad's Procedure on Prevention and Eradication of Sexual Harassment at the Workplace, Doc. No. SMP-GPB-20, Rev. 0 dated 11 Oct 2013. This procedure states the forms of sexual harassment such as verbal, non-verbal, visual, psychological and physical harassment. This grievance mechanism was briefed by the Gender Committee during meetings at GSPE (12 July 2019 & 18 Feb 2020) and at GSOM (20 Sept 2019 & 25 Feb 2020), and during muster briefing.	Complied
<b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited: <ul style="list-style-type: none"> <li>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>Charging the workers for recruitment fees.</li> <li>Contract substitution</li> <li>Involuntary overtime</li> <li>Lack of freedom of workers to resign</li> <li>Penalty for termination of employment</li> </ul>	Based on interviews conducted with local and foreign workers, there is evidence that workers' passports are kept in locked pigeon holes with one key each kept by the worker, and one by the office. Workers have full access to their own passports and have given written confirmation of their agreement to keep their passports with the office.  The GSPE and GSOM do not charge their workers any form of recruitment fee as evidenced by the contract between Genting Plantation Berhad (GPB) and Agensi Pekerjaan MNK Sdn Bhd & its partner in Indonesia, P.T. Primadaya Patama Pandukarya dated 1 Oct 2019. This Agreement is valid until 30 Sept 2020 and states that	Complied

	<ul style="list-style-type: none"> <li>• Debt bondage</li> <li>• Withholding of wages</li> <li>- Critical (Major) compliance -</li> </ul>	<p>GPB shall pay the agent RM2600 per worker as payment for recruitment services (recruitment fees). Indonesian migrant workers who were employed via recruitment agents also confirmed that they have not been charged any recruitment fee. This was also confirmed by migrant workers from Indonesia who were interviewed during the audit. Among the salient points of the contract include:</p> <ul style="list-style-type: none"> <li>- Employer shall not bear cost and expenses for transportation and travel document</li> <li>- Employer shall reimburse agent for expenses incurred for return air ticket and accommodation for employer representative</li> <li>- Agent shall bear cost of transportation of foreign workers from port of entry to designated work places. Employer shall pay costs of sending back worker to country of origin. For new recruitments, GSPE and GSOM agree to pay as follows:</li> </ul> <ol style="list-style-type: none"> <li>a. For male Indonesian: Agency fee (recruitment, levy, workpass, visa, immigration processing fee, GST), total RM3795.</li> <li>b. Harvester mandores (male) from Sulawesi: recruitment, charges at one stop centre, mandore commission, levy, workpass, visa, immigration processing fee, GST, total RM3205.</li> <li>c. Harvester mandores (male) from NTT &amp; NTB RM3405.</li> <li>d. Male non-harvester RM3205.</li> <li>e. Female non-harvester RM3035</li> </ol>	
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		<p>There is no form of contract substitution. All foreign workers interviewed confirmed that while still in their home countries, they were briefed by the recruitment agents and representatives of Genting Plantations Berhad of the types of job they would be doing in Malaysia.</p> <p>There is no evidence of involuntary overtime and all overtime work is done on a mutual basis, as confirmed by Auxiliary Policemen and GSOM workers interviewed.</p> <p>Based on clause 23 of the workers employment contract, workers are able to submit a one-month termination notice. There is no provision in the employment contract of penalty being imposed for termination of employment.</p> <p>Based on interviews and documentation review, there is no evidence of any form of debt bondage or withholding of wages among the workers.</p>	
6.6.2	<p><b>(C)</b> 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>There are migrant workers employed in GSPE and GSOM. A special labour policy and procedures are contained in Sustainability Management Procedure Manual Doc No. SMP-GPB-32 issued on 18 January 2018. This document is entitled Procedure for Social Management which stipulates post arrival trainings/induction on employee terms and conditions, sustainability, safety and health and national laws. It also assures equality and fairness, and mentions living conditions, statutory fee payable and no contract substitution. Based on observations, field visits, worker interviews,</p>	Complied

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		interview with the Health Assistant, and documentation review of induction training records, GSPE and GSOM were able to demonstrate that the Procedure for Social Management has been implemented.	
<b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;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>Responsible person for safety and health already identified as per OSH organization chart. Manager was the one that responsible as safety and health.</p> <p>OSH Meeting was done periodically, latest record 28/2/2020 and previously was on 10/12/2019. The management already arrangement for next meeting will be conduct on 24 July 2020.</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>The accident and emergency procedures establish on Oct 2007 (Doc No. OM-GPB-12 dated 27/8/2015).</p> <p>The first aid training conducted on 8 Feb 2019, trained by HA to all first aider. As verification at site mandore (workers id E10699, and E00287) was aware regarding to First aid.</p>	Complied
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The workers was been issue with the 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. The issuance record available under personal file for review, sampling on workers id (E10017) latest PPE issuance was on 4 July 2020.</p>	Complied



6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>As per accident happen in estate on year 2019, February 2019 accident in Harvesting with LTI 2 days. The management bare the cost for the treatment and 2days MC was pay by employer verified as per March payslip for workers id (E10909). All workers was provided with medical care under SOCSO, latest SOCSO payment was done on June 2020.</p>	Complied
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>The record of Occupational injuries was recorded under JKPP 8 and JKPP 6. Sampling on the LTA record was 12.96 for mill.</p>	Complied
<p><b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b></p>			
<p><b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
7.1.1	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>All the estates in the CU continued to implement Integrated Pest Management (IPM). The estates continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Oil Palm Manual OPM No 5 –Pest And Diseases The IPM program among others involved the following practices;</p> <p>a) Includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma.</p> <p>b) In order to minimize use of pesticides and bagworm control the estates had planted beneficial plants mainly Tunera subulata, cassia cobanensis and Antigonon leptopus with maps indicating areas planted.</p> <p>c) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per</p>	Complied

		year. Baiting was continued until bait acceptance fell below 20%. Barn Owl boxes are erected at ratio of 1: 10 ha to 1: 20 ha.			
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 Sabapalm and Supply base.	Complied		
7.1.3	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. - Minor compliance -	The management not use fire as pest control. No record as per interview and document verification.	Complied		
<b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.					
7.2.1	<b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II class III & class IV pesticides.  a) No illegal agrochemicals (stated by local and international laws) paraquat was used in their estates. b) The usage of the agrochemicals was based on the Sustainability Management Procedure doc no SMP-GPB-28 titled Justification of Pesticides Used revised on 17/3/15. SOP and in the Pictorial Safety Standard Book where written justifications had been provided for various fields operations. The Manual has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs. The chemicals used in the estate among others as shown below; <table border="1" data-bbox="1137 1311 1921 1359"> <tr> <td>Estate</td> <td>Ai/Ha</td> </tr> </table>	Estate	Ai/Ha	Complied
Estate	Ai/Ha				

		Sabapalm estate	1.91	
7.2.2	<p><b>(C)</b> 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>Sabapalm Estate had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available and verified. All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II, class III &amp; class IV pesticides. No illegal agrochemicals (stated by local and international laws) in particular paraquat were used in their estates.</p>		Complied
7.2.3	<p><b>(C)</b> 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>Sabapalm Estate is committed to minimize the usage of agrochemicals through the implementation of IPM practices among others;</p> <ol style="list-style-type: none"> <li>1) Trial using Barn Owl Box to reduce usage on ebor bait</li> <li>2) To increase beneficial planting to reduce pesticide usage.</li> </ol>		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>Sabapalm Estate had not used prophylactic pesticide as per interview and record verification.</p>		Complied
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>	<p>In Genting Sabapalm estate, sighted no record of using Paraquat in estate. The highest class pesticide using was class II, no record using 1A and 1B been sighted from record and site observation.</p>		Complied

	<p>a) Judgment of the threat and verify why this is a major threat</p> <p>b) Why there is no other alternative which can be used</p> <p>c) Which process was applied to verify why there is no other less hazardous alternative</p> <p>d) What is the process to limit the negative impacts of the application</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>		
7.2.6	<p><b>(C)</b> 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 were handled, used or applied by trained workers in accordance with the product label. The Pesticide operators were given training on the safe handling and application of the pesticides. All precautions attached to the products were explained to operators and noted during the interview with workers that they understood and properly observed them. Agrochemical Sprayers, Pre-Mixer and Mandore's understanding on precautions attached to the products and wearing of the required PPE were checked in the field by the auditor. They were found understood during the interview and further confirmed by observing when they work.</p>	Complied
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>The storage of pesticides selected for use was in accordance with recognized best practices, namely, as per Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations.</p> <p>Their chemical stores were inspected and the following were noted.</p> <ul style="list-style-type: none"> <li>- All stores were secured under lock and key with restricted access.</li> <li>- Provision of ventilation fan.</li> <li>- Display of Safety Pictorial poster, namely the required PPE and chemical Safety hazards pictogram.</li> <li>- Pesticides were separated by class.</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- Daily balance of remaining solution after completing pre-mixing were kept in the store under lock and key.</li> <li>- Concrete cemented floor, bund wall and provision of sump pond.</li> <li>- Store keeper was trained in the handling of all pesticides.</li> <li>- SDS leaflets were available at all pesticide stores.</li> </ul> <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.</p>	
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>The empty container will be triple rinsing and store as industrial waste. The management dispose as recycle waste to G-Planter. Sighted record of disposal on 3 July 2020 with total 462 empty containers. The training on triple rinsing and PPE conducted on 12 Feb 2019.</p>	Complied
7.2.9	<p><b>(C)</b> 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 conducted in Sabapalm estate.</p>	Complied
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Medical surveillance conducted on 13 Jan 2020 with total 32 workers included Nursery workers, mandore sprayer, sprayer, driver sprayer, storekeeper, store attendant and fogging operator by Klinik Elopura Sdn Bhd (HQ/12/DOC/00/259).</p>	Complied
7.2.11	<p><b>(C)</b> 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 work on pesticides has been undertaken by pregnant or breastfeeding female worker. Monthly medical check-up was done by HA for women work with chemical. The record was available for reviewed.</p>	Complied

<b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Documented waste management plan was available at Sabapalm Oil Mill and Estate. Among the types of waste identified were scheduled wastes, domestic wastes and recyclable wastes. The scheduled wastes were disposed in accordance to EQA regulations, domestic wastes were landfilled in accordance to procedure and recyclable wastes were delivered to recycle wastes vendors.</p> <p>Receipts of recyclable wastes disposal were available for verification, e.g.</p> <ul style="list-style-type: none"> <li>disposal of empty chemical containers [ref.: used plastic pesticides container recycling (UPPCR) Collection Form by G-Planter dated 3/7/2020] at Sabapalm Estate</li> <li>disposal of recyclable wastes i.e. carton box [ref.: City Express Recycling Sdn Bhd weighbridge receipt #014391, dated 13/3/2020]</li> </ul> <p>With regards to scheduled wastes disposal, the visited operating units have satisfactorily maintained the regulated documents such as notification, inventory records and consignment notes through e-swiss. Among the scheduled wastes generated by the operating units were spent lubricants, spent batteries, contaminated filters &amp; rags, contaminated PPE and clinical wastes to name a few.</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>Ref.: Sustainability Management Procedure Manual, SMP-GPB-12, rev. 1, dated 1/12/2014. Based on interview and site verification, it was noted that the proper disposal of wastes was understood by the workers and management.</p>	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Based on site verification and interview with employees at all the sampled operating units, there was no use of fire in wastes disposal observed. Domestic and household wastes were landfilled and</p>	Complied

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		based on site visit, it was observed that the majority of the wastes were of organic wastes.																
<b>Criterion 7.4:</b> 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 -	Genting Plantation Berhad establish manual for Best Practice for mill and estate. Document referred Procedure Manual (Doc No. PM-MR-01 until PM-MGR-03) dated 2 January 2018 to manage soil fertility to optimise yield and minimise environmental impacts	Complied															
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 periodic tissue sampling was done once a year, latest was on 5-6/3/2020. The Soil sampling conducted on 2018 and result available for reviewed. Research centre will provide the manuring recommendation to ensure the soil always fertile.	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 -	<p>The nutrient recycling strategy was available for review, in Sabapalm estate implementation was using EFB and decanter cake as mulching in estate. As per EFB application record on June 2020 refer detail below:-</p> <table border="1"> <thead> <tr> <th>Division</th> <th>Volume implemented (Tonnage)</th> <th>Hectarage implementation (Ha)</th> </tr> </thead> <tbody> <tr> <td>Sapi</td> <td>3418</td> <td>170.9</td> </tr> <tr> <td>Bangkawat</td> <td>11649.6</td> <td>582.48</td> </tr> <tr> <td>Klagan</td> <td>4398.2</td> <td>219.91</td> </tr> <tr> <td>Total</td> <td>19,465.8</td> <td>973.29</td> </tr> </tbody> </table> <p>For Decanter cake application record as per below:-</p>	Division	Volume implemented (Tonnage)	Hectarage implementation (Ha)	Sapi	3418	170.9	Bangkawat	11649.6	582.48	Klagan	4398.2	219.91	Total	19,465.8	973.29	Complied
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		Division	Volume implemented (Tonnage)	Hectarage implementation (Ha)	
		Sapi	3,257.76	407.22	
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	The latest agronomist report dated 5-6 March 2020. Previously was on 12 – 13 April 2019. As per verification in field 62A, the BRP (Bayovar Rock Phosphate). Have apply 124 bags dated 12/6/2020 as per recommendation from agronomist. The record was maintained in Programme Manuring Bangkawat.			Complied
<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.					
7.5.1	<b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	No fragile soil in Sabapalm estate.			Complied
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 -	No replanting for year 2019, the replanting for year 2020 is planned to start Sept 2020.			Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting of oil palm on steep terrain in Sabapalm estate, as per record the highest terrain only 12 degree as per Slope map (analysis based on SRTM90) dated 10 Oct 2018 by GPRCS (Genting Plantation Research Centre Sabah). Detail can be referred indicator 7.6.3.			Complied



<b>Criterion 7.6:</b> 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><b>(C)</b> 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>	The Soil maps or soil survey available for Sabapalm Estate dated 18 May 2020. The plans and operation followed as per procedure establish by management to sustain suitability of land for palm oil cultivation.	Complied																			
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>	As per site visit verification sighted no marginal and fragile soils in Sabapalm estate.	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>As per Slope map (analysis based on SRTM90) dated 10 Oct 2018 by GPRCS (Genting Plantation Research Centre Sabah) showed:-</p> <table border="1" data-bbox="1137 880 1899 1129"> <thead> <tr> <th>Terrain Clasess</th> <th>Area(Ha)</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Flat (0°-2°)</td> <td>3504.01</td> <td>80.43%</td> </tr> <tr> <td>Undulating (2°-6°)</td> <td>780.22</td> <td>17.91%</td> </tr> <tr> <td>Rolling (6°-12°)</td> <td>72.59</td> <td>1.67%</td> </tr> <tr> <td>Total</td> <td>4356.82</td> <td>100%</td> </tr> </tbody> </table> <p>For soil survey map (Field survey using Garmin) by DOA dated 18 May 2020 as per below detail:-</p> <table border="1" data-bbox="1137 1260 1899 1359"> <thead> <tr> <th>Soil Type</th> <th>Area (Ha)</th> </tr> </thead> <tbody> <tr> <td>Lokan</td> <td>282.14</td> </tr> </tbody> </table>	Terrain Clasess	Area(Ha)	Percentage	Flat (0°-2°)	3504.01	80.43%	Undulating (2°-6°)	780.22	17.91%	Rolling (6°-12°)	72.59	1.67%	Total	4356.82	100%	Soil Type	Area (Ha)	Lokan	282.14	Complied
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<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.																					
7.7.1	<p><b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	No new Planting on peat area in Sabapalm estate.	Complied																		
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	No new Planting on peat area in Sabapalm estate.	Complied																		

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7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.          - Critical (Major) compliance -</p>	<p>The subsidence soil monitoring was done 1 years once. Latest monitoring conducted on 27/7/2019. No movement from the previous record for subsidence soil.</p>	Complied
7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.          - Critical (Major) compliance -</p>	<p>The monitoring of water table using piezometer, conducted by weekly monitoring dated 2 June 2020. The water table was between 75 cm and 60 cm.</p>	Complied
7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.           This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.           Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.          - Critical (Major) compliance -</p>	<p>No replanting within 5 years for peat area in Sabapalm estate. The field of peat area with total 1334.3 ha in Sabapalm will start replanting around year 2030. Not applicable.</p>	Complied
7.7.6	<p><b>(C)</b> 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.          - Critical (Major) compliance -</p>	<p>The existing planting on peat area are managed according to the RSPO manual on Best Management Practices such as water table management, piezometer motoring and etc.</p>	Complied
7.7.7	<p><b>(C)</b> 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</p>	<p>Not applicable because no unplanted and set-aside peatlands in the managed area.</p>	Not Applicable

	<p>'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>		
<p><b>Criterion 7.8:</b> 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>- Minor compliance -</p>	<p>Genting Sabapalm Estate has established its water management plan dated 25/2/2020. The objective of the plan is to conserve the potable water. Apart from that, in order to maintain the availability of surface and ground water, water management plan for peat area, flooded area, protection of water courses &amp; wetlands, pollution prevention through establishment of riparian zones and management of water table through installation of water gates.</p>	Complied
7.8.2	<p><b>(C)</b> 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>The potable water for workers is provided at the houses through pipelines. The water is sourced from water catchment ponds and treated at the water treatment plants. The clean water quality is tested quarterly to ensure safety. For example, the latest three analysis reports for workers housing at Bangkawat Division were available for verification [ref.: W200129/04B (29/1/2020), W190926/01 (24/9/2019) and 20190214/02A (14/2/2019)].</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>Based on site visit, it was observed that 50 m of riparian zone was allocated along Labuk River adjacent to Sabapalm Estate. The existing palms in the zone were not felled during replanting. They were left to nature. This can be seen at Field #7 [5°56'60" N 117°21'35" E].</p>	Complied
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p>	<p>The mill applies the biological system with 16 ponds in series for its treatment of effluent. The mill is disposing its effluent through land</p>	Complied

	<p>- Minor compliance -</p>	<p>irrigation in the field. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&amp;G, AN and TN. Last 12 months results were verified where highest BOD=315 ppm while lowest was 109 ppm. This is in compliance with the regulated limit i.e. 500 ppm.</p> <p>Competent Person as required by legal was also verified. Currently, the responsibility is held by the mill manager, Certificate No. CePPOME/196434, validity 4/2/2019-4/2/2020.</p>	
<p><b>Criterion 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised</p>			
<p>7.9.1</p>	<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>Plan for improving efficiency of fossil fuel was spelt out in "Management Plan to Improve Efficiency of Diesel Usage". Among the plans established by the operating units were:</p> <p><u>Estate</u></p> <ul style="list-style-type: none"> <li>• regular service of tractors for efficient running of engines</li> <li>• to educate tractor drivers on diesel saving</li> <li>• to replace the electricity supply from generator set to national grid (SESB)</li> </ul> <p><u>Mill</u></p> <p>Fossil fuel was most consumed at the engine room where the average consumption is 2.24 lt/mt FFB. Since May 2020, the mill has been using electricity supplied by SESB. Thereafter, the average consumption as at June 2020 has declined to 0.196 lt/mt FFB. The data is documented in the mill's monthly diesel consumption record.</p> <p>Monitoring of diesel fuel consumption was done by all the visited operating units. The data was then used for GHG calculating by using the RSPO GHG Calculator.</p>	<p>Complied</p>

<b>Criterion 7.10:</b> 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><b>(C)</b> 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 &amp; impact assessment. Among the source of GHG emissions were effluent treatment plant, diesel consumption and fertiliser consumption to name a few. The plan to reduce or minimise the GHG emission has been established and implemented. In general, among the action plans were:</p> <ul style="list-style-type: none"> <li>- To optimise the usage of diesel through regular maintenance of farm tractors, replacement of old tractors and effective</li> <li>- To apply more organic fertiliser such as bunch ash, EFB therefore reducing inorganic fertiliser dependency</li> </ul> <p>RSPO GHG Calculator version 4 is used. The consumption of fertilisers and diesel were verified through</p> <p>Estate:</p> <ul style="list-style-type: none"> <li>• Lintramax Store Report</li> <li>• Bin card</li> <li>• store requisition &amp; issuance note</li> </ul> <p>Mill:</p> <ul style="list-style-type: none"> <li>• Stock Issue Summary (Lintramax)</li> <li>• Diesel Store Record</li> <li>• store requisition &amp; issuance note</li> <li>• Effluent Treatment Plant Log sheet</li> </ul> <p>Based on the verification of the above records, all the sampled issuance was traceable.</p>

Complied

7.10.2	<p><b>(C)</b> 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 no new development by the certification unit.	Not Applicable
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Other significant pollutant identified is the smoke emission from boiler operation. The mill currently is using multi-stage dust cyclone to minimise the pollutant. Monitoring of quality is done through regular stack sampling. Verification of the stack sampling reports [ref.: report # MS/GSOM/2019/BOILER NO. 3(S3)-2<sup>ND</sup> HALF, dated 15/9/2019 and RT003/2020/010, dated 10/3/2020 showed that the mill did not comply with the regulated limit which is 150 mg/m<sup>3</sup>. Nonetheless, the mill has been granted with contravene license [license no. 005230, validity 3/9/2019 to 3/9/2020] by the DOE. In order to comply the regulated limit, the mill is in the midst of getting its electrostatic precipitation (ESP) to be commenced which is expected to be at the end of the year.</p>	Complied
<b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the site visit of the replanting area at the estate (Field #9), there was no evidence that fire had been used for land preparation. Oil palms were felled, chipped and windrowed.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>The Genting Sustainability Department is in the midst of finalising the fire prevention and control measures and draft is already available for viewing. The document will be disseminated to all the Genting's operating units once approved.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p>	<p>Although its fire prevention and control measures is in the draft stage, there was no evidence that the adjacent stakeholders were engaged in developing it. The adjacent stakeholders consist of</p>	Non-compliance

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	- Minor compliance -	among others approximately 20 smallholders, Kg Tagas, Kg Tembidong-bidong, and Masih Jaya Estate.	
<b>Criterion 7.12:</b> 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><b>(C)</b> 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>	Not applicable as no new development by the certification unit.	Not Applicable
7.12.2	<p><b>(C)</b> 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><b>PROCEDURAL NOTE:</b> 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>Genting Plantation has conducted HCV assessment for Genting Sabapalm POM and Genting Sabapalm Estate and documented in Inventory on HCV sites within Genting Plantation Bhd group estates (Sabah Region 1) by S.K. Yap Forestry and Landscape Advisory Services on Oct 2009 – July 2010.</p> <p>Only HCV 4.2, Labuk River and Bengkawat River and HCV 6, burial grounds for local communities within were identified in GSPE during the assessment.</p>	Complied
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable.	Not Applicable



7.12.4	<p><b>(C)</b> 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>	Not applicable as no new development by the certification unit.	Not Applicable
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>	Not applicable as no new development by the certification unit.	Not Applicable
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>There is no RTE or high biodiversity value at GSPE except for estuarine crocodiles found at Labuk River.</p> <p>The HCV management plan has been established. Latest review was conducted on 1/3/2019.</p> <p>Sighted the river riparian buffer zone at Labuk and Bengkawat River were clearly demarcated with red ring to show the distance of the buffer zone. Sighted the signage of prohibition for chemical spraying, manuring, slashing, swimming and fishing erected at the riparian buffer zone. No evidence of chemical application activity along the buffer zone.</p> <p>RTE signage erected at the estate entrance.</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>	Not applicable as no new development by the certification unit.	Not Applicable
7.12.8	<p><b>(C)</b> 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>	Not applicable as no new development by the certification unit.	Not Applicable

**Appendix B: Approved Time Bound Plan**

No	Subsidiaries & Ownership (%)	Name of the Estate and Mills		TBP for certification	Status as of October 2020	Any unresolved non-compliances
1	Genting Plantations (WM) Sdn Bhd & Setiamas Sdn Bhd(100%)for estates  Genting Oil Mill Sdn Bhd (100%) for mill	Genting Sri Gading Estate,	Supply base for Genting Ayer Item Oil Mill, Johor, Malaysia	Dec,2014	Certified	None
		Genting Sungei Rayat Estate,				
		Genting Kulai Besar Estate,				
		Genting Tanah Merah Estate,		Dec,2015		
		Genting Tebong Estate,		July, 2015		
		Genting Sepang Estate		Feb, 2020		
		Genting Cheng Estate				
2	Genting Plantations (WM) Sdn Bhd (100%)for estates	Genting Selama Estate, Kedah, Malaysia		July 2019	Certified	None
3	Genting SDC Sdn Bhd (100%)	Genting Sabapalm Estate, Sabah, Malaysia	Supply base for Genting Sabapalm Oil Mill, Sabah, Malaysia	Aug,2015	Certified	None

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4	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
		Genting Tenegang Estate, Sabah, Malaysia				
		Genting Layang Estate, Sabah, Malaysia				
		Genting Bahagia Estate,				
	Landworthy Sdn Bhd (84%)	Genting Landworthy Estate, Sabah, Malaysia				
5	Genting Tanjung Bahagia Sdn Bhd ( 100%) for estates	Genting Indah Estate, Sabah, Malaysia	Supply base for Genting Indah Oil Mill, Sabah, Malaysia	2020		Concept Note for RACP re-submitted to RSPO.
		Genting Permai Estate, Sabah, Malaysia				
		Genting Kencana Estate, Sabah, Malaysia				
6	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
7	Genting Plantations Bhd	Genting Sekong Estate, Sabah, Malaysia	Supply base for Genting Trushidup	Sept,2017	Certified	None

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	Wawasan Land Progress Sdn Bhd (100%)		Oil Mill, Sabah, Malaysia			
	Asiaticom Sdn Bhd (100%)	Genting Suan Lamba Estate, Sabah, Malaysia				
	Sawit Sukau Usahasama Sdn Bhd(56%)					
8	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 Sawit Mitra Abadi (70%)	Abadi 1 & 2 Abadi 3 & 4				
9	Genting Plantations Berhad (100%)	Genting Mewah Estate, Sabah, Malaysia	Supply base for Genting Mewah Oil Mill, Sabah, Malaysia	Mar, 2017	Certified	None
10	Genting Plantations (WM) Sdn Bhd (100%)	Genting Bukit Sembilan Estate, Kedah, Malaysia		July, 2017	Certified	None

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11	PT Globalindo Agung Lestari (60%)	Lamunti Barat Estate Lamunti Timur Estate I & II Mangkatip Estate I & II Bakuta Estate Plasma Timur & Barat	Supply base for Globalindo Oil Mill, Kalimantan, Indonesia	Oct,2023		In process of obtaining HGU  NPP for PT UAI in progress. In the process of obtaining HGU for UAI.
	PT United Agro Indonesia(60%)	PT UAI 1 & 2 UAI Plasma		Oct, 2023		
12	PT Susantri Permai (95%)	Puroh Estate Masaha Estate Zircon Hill Estate	Supply base for Golden Hill Oil Mill, Kalimantan, Indonesia	Oct, 2022		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		SP Plasma		Oct, 2023		
13	PT Kapuas Maju Jaya (95%)	Waterfall Estate I & II Muhun Estate I & II Talawang Estate I & II	Supply bases for Golden Hill Oil Mill, Kalimantan Indonesia	Oct,2022		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		KMJ Plasma		Oct, 2023		

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	PT Dwie Warna Karya ( 95%)	Golden Hill Estate I Golden Hill Estate II Diamond Hill Estate		Oct , 2022		In the process of obtaining Forest Release and Forest Exchange prior to HGU application.
		DWK Plasma		Oct, 2023		
14	PT Citra Sawit Cemerlang (70%)	CSC Estates	Supply base for CSC Oil Mill*	Oct,2021		In process of obtaining HGU. HCSA report completed review
15	PT Surya Agro Palma (70%)	SAP Estate 1&2 SAP Estate 3&4 SAP Estate 5&6	Supply base for SAP Oil Mill*	Oct, 2020		In process of obtaining HGU. HCSA report completed review
	PT Agro Abadi Cemerlang (70%)	AAC 1 & 2 AAC 3 & 4				
16	PT Palma Agro Lestari Jaya (70%)	PALJ Estates	Supply base for PALJ Oil Mill*	Aug,2023		In process of obtaining HGU. HCSA report completed review
		PALJ Plasma				

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17	Knowledge One Investment Pte Ltd ( 85%)-PT Kharisma Inti Usaha ( KIU)	KIU 1 & 2	Supply base for KIU Oil Mill	July,2020		NPP in progress. HCV report being reviewed by HCVRN.  HCSA report to be reviewed by HCSA.
		KIU 3 & 4		July 2022		
		KIU Plasma				



**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in 2019 for Genting Sabapalm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2018 for Genting Sabapalm Oil Mill and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	3.37
PKO	3.37

Extraction	%
OER	21.14
KER	4.04

Production	t/yr
FFB Processed	120,490.44
CPO Produced	25,468.571
PKO Produced	4,873.461

Land Use	Ha
OP Planted Area	2,619.54
OP Planted on peat	1,334.69
Conservation (forested)	0
Conservation (non-forested)	17.39
<b>Total</b>	<b>3,954.23</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	39054.46	0.43	0	0	0	0	39054.46	0.43
CO <sub>2</sub> Emission from fertilizer	3132.10	0.03	0	0	0	0	3132.10	0.03
NO <sub>2</sub> Emission from peat	9991.09	0.11	0	0	0	0	9991.09	0.11
NO <sub>2</sub> Emission from fertilizer	2133.84	0.02	0	0	0	0	2133.84	0.02
Fuel Consumption	1023.77	0.01	0	0	0	0	1023.77	0.01
Peat Oxidation	72873.51	0.80	0	0	0	0	72873.51	0.80
<b>Sink</b>								
Crop Sequestration	-37018.46	-0.41	0	0	0	0	-37018.46	-0.41

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Conservation Sequestration	0	0	0	0	0	0		
<b>Total</b>	<b>91190.31</b>	<b>1.00</b>			<b>3246.88</b>		<b>94437.18</b>	

\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	7329.93	0.06
Fuel Consumption	527.03	0
Grid Electricity Utilization	0	0
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>7856.97</b>	<b>0.07</b>

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

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

\*This mill has no kernel crusher operation.

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

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

**Appendix D: Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	Mar-19	6,798.44	2,278.08	9,076.52
2	Apr-19	6,372.68	2,193.64	8,566.32
3	May-19	5,394.15	1,923.45	7,317.60
4	Jun-19	6,179.03	2,242.35	8,421.38
5	Jul-19	6,122.30	2,127.13	8,249.43
6	Aug-19	8,612.88	2,710.94	11,323.82
7	Sep-19	10,312.70	3,381.70	13,694.40
8	Oct-19	10,618.31	3,769.58	14,387.89
9	Nov-19	7,960.28	3,137.21	11,097.49
10	Dec-19	8,057.10	2,350.15	10,407.25
11	Jan-20	5,070.36	1,924.04	6,994.40
12	Feb-20	5,427.29	2,079.35	7,506.64
13	Mar-20	6,963.67	2,715.48	9,679.15
14	Apr-20	7,945.77	3,484.74	11,430.51
15	May-20	8,456.63	3,267.09	11,723.72
	<b>Total</b>	<b>110,291.59</b>	<b>39,584.93</b>	<b>149,876.52</b>
<b>Note:</b>				

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	Mar-19	1,481.70	288.07
2	Apr-19	1,416.25	269.73
3	May-19	1,172.11	228.37
4	Jun-19	1,292.44	259.13
5	Jul-19	1,226.79	240.49
6	Aug-19	1,871.27	320.47
7	Sep-19	2,235.81	380.16
8	Oct-19	2,384.33	422.18
9	Nov-19	1,688.15	321.79

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10	Dec-19		1,525.67	320.80
11	Jan-20		998.30	200.48
12	Feb-20		1,048.60	210.14
13	Mar-20		1,415.94	265.60
14	Apr-20		1,621.96	296.78
15	May-20		1,826.04	327.77
Total			23,205.35	4,351.94
<b>Note:</b>				

<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Undisclosed 1	-	201.12	
3	Undisclosed 3	-	1,907.96	
4	Undisclosed 4	-		2,354.51
5	Undisclosed 5	-		589.73
Total			2,109.08	2,944.24
<b>Note:</b>				

<b>D. Records of CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Undisclosed 6	ISCC EU	19,095.41	-
2	Undisclosed 7	ISCC EU	280.16	-
Total			19,375.57	-
<b>Note:</b>				

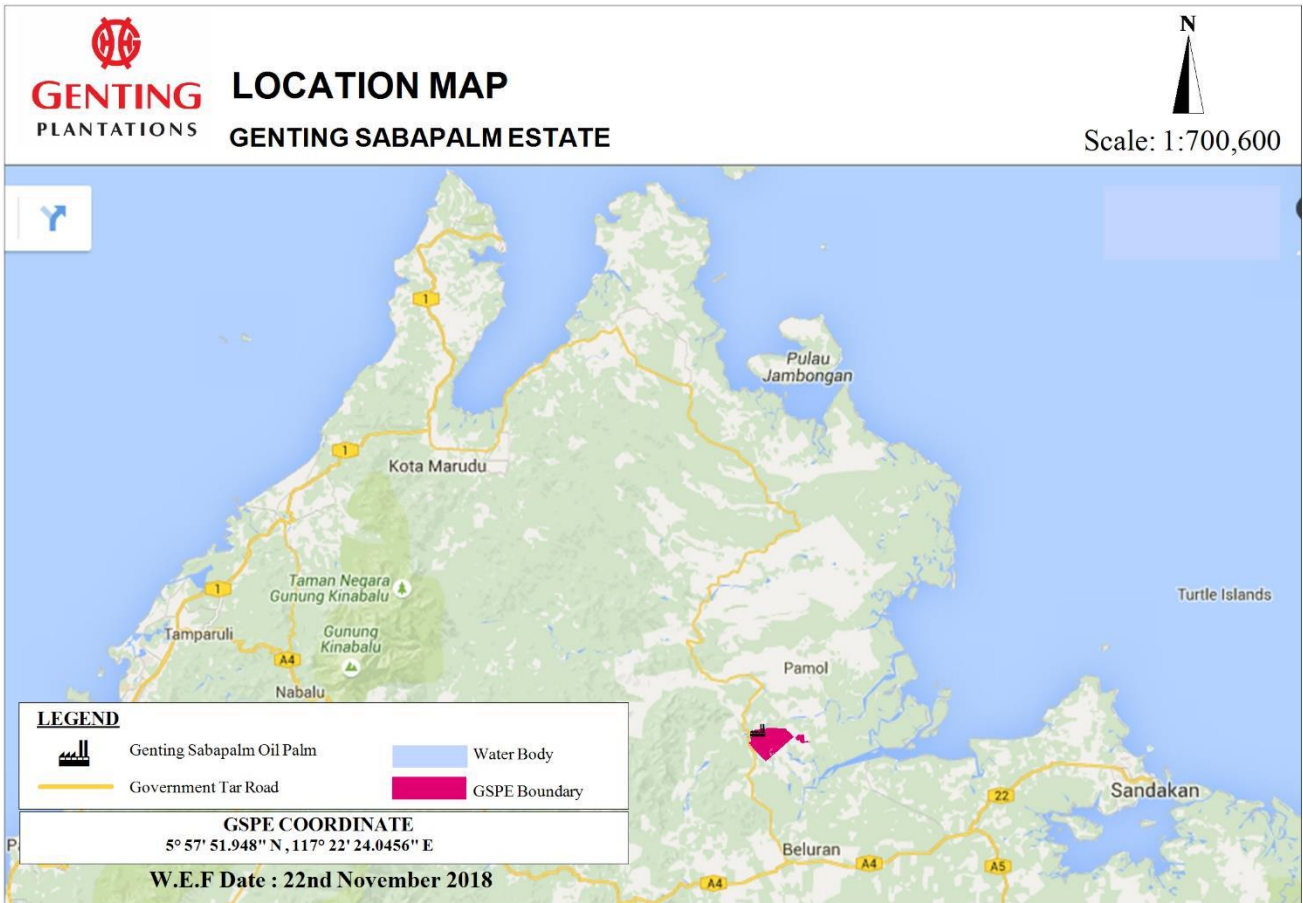
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<b>E. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>
1	Undisclosed 8	874.49	
2	Undisclosed 9	55.96	210.25
3	Undisclosed 10	114.92	1,029.56
Total		1,045.37	1,239.81
<b>Note:</b>			

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

**Appendix E: Location Map of Certification Unit and Supply bases**

**Genting Sabapalm Oil Mill and Genting Sabapalm Estate**



**Appendix F: Estate Field Map**

- Included in Appendix E.

**Appendix G: List of Smallholder Sampled**

Not applicable



## Appendix H: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
GSPE	Genting Sabapalm Estate
GSOM	Genting Sabapalm Oil Mill
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